

1 ICR SUPPORTING STATEMENT

1. Identification of the Information Collection

1(a) Title of the Information Collection

CEQ-EPA Presidential Innovation Award for Environmental Educators Application (Renewal)

EPA ICR Number 2524.02, OMB Control Number 2090-0031

1(b) Short Characterization/Abstract

The purpose of this information collection request is to collect applications for the Presidential Innovation Award for Environmental Educators program. The U.S. Environmental Protection Agency (EPA or the Agency), in conjunction with the White House Council on Environmental Quality (CEQ), established the award program to meet the requirements of Section 8(e) of the National Environmental Education Act (20 U.S.C. § 5507(e)).

Agency officials developed the “Application for the Presidential Innovation Award for Environmental Educators” as a tool for selecting awardees. Teachers can participate by visiting <http://www2.epa.gov/education/piaee-application> and completing and submitting the application form. Application forms can be filled electronically and submitted by email or printed and mailed. Information collected includes background about the teacher and his/her experience, completed essay responses, sample teaching materials, and recommendations from a student, principal, and fellow teacher. EPA anticipates that the number of respondents completing the form during the period of this ICR will average 75 per year.

Information gathered under the application form will be collected and stored in electronic format at Agency headquarters, on a secured drive. The information collected from this ICR will continuously help EPA and CEQ to select the top awardees for the Presidential Innovation Award for Environmental Educators (PIAEE). The selected winners will benefit from small cash prizes, which will help them to continue their mission of advancing innovative approaches to environmental education to grades K-12.

2. Need For and Use of the Collection

2(a) Need/Authority for Collection

The National Environmental Education Act Section 8(e) (20 U.S.C. § 5507(e)) dictates that EPA and CEQ provide cash awards for elementary and secondary education teachers and local education agencies. Specifically:

- (1) The Chairman of the Council on Environmental Quality, on behalf of the President, is authorized to develop and administer an awards program to recognize elementary and secondary education teachers and their local educational agencies who demonstrate excellence in advancing environmental education through innovative approaches. One teacher, and the local education agency employing such teacher, from each State, including the District of Columbia and the Commonwealth of Puerto Rico, are eligible to be selected for an award pursuant to this subsection.
- (2) The Chairman is authorized to provide a cash award of up to \$2,500 to each teacher selected to receive an award pursuant to this section, which shall be used to further the recipient's professional development in environmental education.
- (3) The Chairman is also authorized to provide a cash award of up to \$2,500 to the local education agency employing any teacher selected to receive an award pursuant to this section, which shall be used to fund environmental educational activities and programs. Such awards may not be used for construction costs, general expenses, salaries, bonuses, or other administrative expenses.

The application form is completed by candidates for consideration as awardees under the PIAEE. The application form is completed as part of the awardee selection process. The application form is reviewed by the program manager and a panel of EPA and CEQ officials to determine eligibility and fulfillment of selection criteria. Using the application form benefits EPA by allowing for the selection of qualified awardees.

2(b) Practical Utility/Users of the Data

Information gathered under the application form will continuously help EPA and CEQ select the top awardees for the Presidential Innovation Award for Environmental Educators. Using this form enables program managers and reviewers to select viable candidates for the awards.

3. Non-duplication, Consultations, and Other Collection Criteria

3(a) Non-duplication

Almost all information requested from respondents under this ICR is personal in nature, and in most cases, is not available from other sources.

3(b) Public Notice Required Prior to ICR submission to OMB

Public notice on the renewal of this ICR was published in the *Federal Register* on December 31, 2018 under 83 FR 65668. This notice indicates that the ICR is up for renewal and that public comments on the previous burden estimates and any proposed

changes are being sought by the EPA Office of Public Engagement and Environmental Education (OPEEE). There were no comments received.

3(c) Consultations

In the preparation of this ICR renewal, the EPA OEE provided past respondents the opportunity to comment on the burden associated with the standard. The respondents reported that on average it takes 10 hours to complete the application form, which was not found to be overly burdensome.

- Daniel Delcher
Essex County School of Technology
2017 Presidential Innovation Award for Environmental Educators Winner
ddelcher@essextech.org
- Laura Poidomani
Sax Middle School
2017 Presidential Innovation Award for Environmental Educators Winner
Laura.poidomani@ncps-k12.org

3(d) Effects of Less Frequent Collection

The award program is conducted on an annual basis. The form is required to be completed once a year in order to select each year's awardees. The form allows government officials to select qualified awardees for the program, as required by the National Environmental Education Act (See Section 2 (a)). EPA would not be able to fulfill the requirements of the Act if the frequency of the collection period decreased.

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, Section 1320.5.

3(f) Confidentiality

The primary use of the information collected on this form is to allow EPA to review and select awardees in accordance with the National Environmental Education Act. Some information reported on the form is confidential, which includes name, address and phone number. This information is required to be withheld from the public pursuant to Section 107(a) of the Ethics in Government Act of 1978. Agency personnel shall not publicly release the information contained therein.

3(g) Sensitive Questions

This information collection does not include questions concerning sexual behavior or attitudes, religious beliefs, or other matters usually considered private and none of the

information collected by this action results in or requests sensitive information of any nature.

4. The Respondents and the Information Requested

4(a) Respondents/NAICS Codes

The respondents are K-12 teachers who teach on a full-time basis in a public school that is operated by a local education agency, including schools funded by the Bureau of Indian Affairs. For this program, a local education agency is one as defined by section 198 of the Elementary and Secondary Education Act of 1965 (now codified at 20 U.S.C. 7801(26)). The NAICS code is 561311.

4(b) Information Requested

A copy of the application form is attached as Attachment A.

(i) Data items, including record keeping requirements

The Agency will maintain an Excel spreadsheet of the names of the respondents, their email address, and associated reviewer scores for selection purposes. This spreadsheet is for internal use only and not available to the public. Additionally, EPA will retain a hard copy of each completed application form and store according to Agency guidelines. Completed applications that are distributed to reviewers will have any confidential information redacted. The Agency does not anticipate any record keeping activities on the part of the respondents under this ICR.

(ii) Respondent Activities

Respondents will be asked to complete the application form. Forms may be downloaded from EPA's education website. Respondents can fill in the form electronically and may either print and mail a copy or they may attach the completed form by email. Each form will require the applicant to read the instructions, complete the application, write the essay responses and sample materials, and gather letters of recommendation. The form will take approximately 10 hours to complete.

5. The Information Collected—Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

Agency (EPA) activities associated with the collection of information include:

Program Manager:

- Internal development, review and approval of Application Form (updated 2017)
- Taking actions to review the form, ascertain improvements, and revise periodically (approximately 2-year intervals or more if needed)

- Providing copies of the application form
- Answering any respondent questions, follow-up
- Gathering respondents' completed forms
- Screening respondents' completed forms
- Recordkeeping/storing the completed form
- Forwarding form to EPA's Reviewers

Reviewers:

- Review of respondents' completed forms
- Ranking awardee selections

To respond to this ICR, we estimate that the Program Manager will spend 3.5 hours per respondent screening applications and answering respondent questions.

Each application is required to be reviewed by a minimum of 3 reviewers. EPA estimates that each reviewer spends 2 hours reviewing each application form, including completing a written evaluation of the application package and discussing winner selections.

5(b) Collection Methodology and Management

In collecting and analyzing the information associated with this ICR, EPA will use computers, e-mail, and websites. Respondents can obtain a blank application form from the EPA website. They may fill out the application form either electronically or in hard copy. The respondents can type essays in a Word document and attached them to the application form. Respondents can either print and mail in the application form and essay responses or send them as an email attachment. While respondents may type their information on the form, they must complete the signature page. In this case, respondents are allowed to print the signature page, sign, and scan the page as an attachment.

EPA will ensure the accuracy and completeness of collected information by reviewing each submittal and screening for missing components. EPA will enter basic contact information from the completed application form (name, school, email address) into an Excel Database that will only be accessible by the Program Manager. Each application form and essay responses are reviewed by a minimum of two EPA reviewers. Each reviewer submits the score to the Program Manager and the Program Manager will enter the score in to the Excel Database. This information is aggregated to select the respondents with the highest average scores from each EPA region as awardee finalists. This information is not available to the public.

5(c) Small Entity Flexibility

The respondents are small entities (i.e., teachers). The impact of small entities was taken into consideration during the development of the PIAEE application. The amount of questions asked was the minimum amount of information needed in order to make a decision on the awards.

5(d) Collection Schedule

EPA anticipates having the following annual collection schedule.

- January– Application period opens. Respondents can download the application form from the EPA website and submit the completed form and essay responses via hard copy or email.
- March 30 – Application period closes.
- May 1 – May 30 – EPA screens and reviews applications.
- June 1 – EPA aggregates reviewer scores and submits selected finalists to CEQ.
- June 1-30 – CEQ reviews and screens finalists’ applications.
- Second week of July – EPA announces award winners.

After the initial completion of the application form, respondents who are selected as finalists may be asked to provide additional information, including proof of the number of years teaching and may undergo screening by CEQ.

6. Estimating the Burden and Cost of the Collection

6(a) Estimating Respondent Burden

Elementary and secondary schools mean hourly wage: \$26.67.

<https://www.bls.gov/oes/current/oes250000.htm>

To respond to this ICR, we estimated that each respondent will take 10 hours to complete the application form. The estimated labor cost for elementary and secondary school employees is \$27.00, which including the standard overhead factor of 1.6, produces a loaded wage rate of \$43.20 (rounded to \$43). We estimate that approximately 75 teachers will respond to this request each year. Multiplying the estimated number of respondents (75) by the estimated respondent labor cost (\$43) by the number of hours (10), we estimate the annual average dollar burden estimate for this ICR to be \$32,251. The grand total for all 3 years is estimated at \$96,753.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

Annual Cost for Teacher Award Respondents

Respondent Activities to Complete Form	Burden Hours Per Respondent	Burden for Respondent (\$26.67 per labor hour multiplied by 1.6 for overhead equals \$43)	Number of Respondents Per Year	Total Respondent Cost Per Year
Read instructions	0.5	\$43	75	\$1,613
Fill out form	1	\$43	75	\$3,225
Write essays	4.5	\$43	75	\$14,513
Gather recommendations	1	\$43	75	\$3,225
Written sample	2	\$43	75	\$6,450

Respondent Activities to Complete Form	Burden Hours Per Respondent	Burden for Respondent (\$26.67 per labor hour multiplied by 1.6 for overhead equals \$43)	Number of Respondents Per Year	Total Respondent Cost Per Year
materials				
Submit application package	1	\$43	75	\$3,225
TOTAL	10 hours	\$43	75	\$32,251

(ii) Estimating Capital and Operations and Maintenance Costs

There are no capital or operations and maintenance costs.

(iii) Capital/Start-up Operating and Maintenance (O&M) Costs

There are no capital/startup operating and maintenance costs.

(iv) Annualizing Capital Costs

There are no capital costs.

6(c) Estimating Agency Burden and Cost

The Program Manager’s labor cost is estimated to be a GS 13 Step 5. For Year 1, that is \$52.66 per hour, \$54.21 for Year 2, and \$55.76 for Year 3, according to the Office of Personnel Management’s 2018 Salary table

<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2018/general-schedule/>. This ICR uses the average wage of \$54 in cost calculations for Program Managers.

The reviewer labor cost is estimated to be a GS 13 Step 1. For Year 1 that is \$46.46 per hour \$48.01 per hour for Year 2, and \$49.56 per hour for Year 3, according to the Office of Personnel Management’s 2018 Salary Table

<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2018/general-schedule/>. This ICR uses the average wage of \$48 in cost calculations for reviewers.

The Program Manager and Review Panel total labor rates below include a factor of 1.6 (60%) for overhead costs.

Annual Agency Burden and Cost

	Agency Hours Per Respondent	Total No. Respondents Per Year	Labor Cost Per Year	Overhead Cost Per Year	Total Labor Cost
Program Manager Activities	\$54 per hour			(60 percent of labor cost)	

	Agency Hours Per Respondent	Total No. Respondents Per Year	Labor Cost Per Year	Overhead Cost Per Year	Total Labor Cost
Distribute form to respondents and answer their questions	60 minutes (1 hour)	75	\$4,050	\$2,430	\$6,480
Recordkeeping	30 minutes (0.5 hours)	75	\$2,025	\$1,215	\$3,254
Screening of applications	60 minutes (1 hour)	75	\$4,050	\$2,430	\$6,480
Distribution of applications for review	20 minutes (0.33 hours)	75	\$1,350	\$810	\$2,160
Forwarding awardee selections to CEQ for vetting	20 minutes (0.33 hours)	75	\$1,350	\$810	\$2,160
Announcing winners	20 minutes (0.33 hours)	75	\$1,350	\$810	\$2,160
<i>Program Manager Subtotal</i>	<i>3.5 hours</i>	<i>75</i>	<i>\$14,175</i>	<i>\$8,505</i>	<i>\$22,680</i>
Reviewer Activities	\$48 per hour				
Reviewing applications	1.5 hours	75	\$5,184	\$3,110	\$8,294
Discuss and rank winners	0.5 hours	75	\$1,800	\$1,080	\$2,880
<i>Reviewer Subtotal</i>	<i>2 hours</i>	<i>75</i>	<i>\$6,984</i>	<i>\$4,190</i>	<i>\$11,520</i>
<i>Subtotal for 3 Reviewers</i>	<i>6 hours</i>		<i>\$20,952</i>	<i>\$12,750</i>	<i>\$33,702</i>
EPA Grand Total (Program Manager & Reviewers)	9.5 hours	712.5 hours for 75 respondents	\$35,127	\$21,255	\$56,382

6(d) Estimating the Respondent Universe and Total Burden and Costs

See 6(a) and (b).

6(e) Bottom Line Burden Hours and Cost Tables

(i) Respondent Tally

Bottom-Line Annual Burden and Cost for PIAEE Respondents

PIAEE Respondent Activities to Complete Application Form	Burden Hours/Respondent	Burden for Respondent (\$26.67 per labor hour multiplied by 1.6 for overhead equals \$43)	Number of Respondents Per Year	Total Annual Burden Hours	Total Cost Per Year
Total Per Year	10 hours	\$43	75	430	\$32,250

(ii) The Agency Tally

Bottom-Line Annual Agency Burden and Cost

	Agency Hours for Each Respondent	Number of Hours Per Year	Labor Cost Per Year	Overhead Cost Per Year	Total Agency Cost Per year
Agency Total (Program Manager & Reviewers) for 75 Respondents	9.5 hours	712.5	\$35,127	\$21,255	\$56,382

(iii) Variations in the Annual Bottom Line

We do not anticipate major variations in the annual bottom line burden hours and costs for the respondents or the Agency.

6(f) Reasons for Change in Burden

There has been no change in the number of respondents or respondent burden hours since the original ICR was issued in 2016. The individual cost per respondent has risen, due to increases in the hourly wage estimates.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 10 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purpose of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjusting the existing ways to comply with any previously applicable applications and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit, or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control number for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this OCR under Docket Number EPA-HQ-OA-2018-0553, which is available for online viewing at www.regulations.gov, or in person viewing at the Office of Environmental Information Docket in the EPA Docket Center (EPA/DC), EPA William Jefferson Clinton West Building, Room 3334, 1301 Constitution Avenue, NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. – 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Office of Environmental Information Docket is (202) 566-9744. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OA-2015-0553 and OMB Control No. 2090-0031 in any correspondence.