

**Supporting Statement
Health Resources and Services Administration
Environmental Information and Documentation (EID)**

0915-0324- Revision

JUSTIFICATION

1. Circumstances of Information Collection

The Health Resources and Services Administration (HRSA) is requesting Office of Management and Budget (OMB) approval of a revision of a currently approved data collection: OMB # 0915-0324, the Environmental Information and Documentation (EID) form. HRSA is making minor revisions to better align the form with 45 C.F.R. Part 75. The EID consists of information HRSA is required to obtain to comply with the National Environmental Policy Act of 1969 (NEPA). HRSA uses the information collected to make a determination as to NEPA compliance, and the EID becomes part of the administrative record for grantees to meet their assurances requirements for receiving a grant. A completed EID is required from all applicants requesting HRSA program funding that supports capital improvements with the potential to significantly affect the human environment, such as construction/expansion or alteration/renovation activities as defined in the associated HRSA program guidance, or installation of fixed equipment. This form is designed to minimize hourly burden on grant applicants while still meeting the current minimum requirements for NEPA.

HRSA is proposing minor revisions to better align the form with 45 C.F.R. Part 75. Please see the attached EID form with track changes.

2. Purpose and Use of Information

HRSA uses the information collected to make a determination as to NEPA compliance. Applicants provide the information requested in the EID in order to qualify to receive benefits in the form of grants for purposes outlined in the applicable law.

The EID collects specific project and site related information not collected in other application forms. HRSA uses this information along with overall program applications to determine eligibility and the level of environmental review required under NEPA and related laws for construction related awards. For example, information submitted on the EID may show that the proposed project impact is minimal and therefore the project requires no further review under NEPA and other related laws. Alternatively, the results of the EID may also identify that the proposed project does require further review and evaluation such as: 1) the preparation and public notice of an Environmental Assessment under NEPA; 2) consultation under Section 106 of the National Historic Preservation Act (NHPA); 3) site testing for the presence of hazardous materials such as asbestos or lead; or 4) further consultation and coordination with other federal agencies on issues such as endangered species, floodplain management, or wetland permits.

The questions provide information relevant to the following laws:

- 42 U.S.C. § 4321 et seq., National Environmental Policy Act
- Patient Protection and Affordable Care Act (111-148)
- Health Center Consolidation Act 1996, Section II, Subpart I, (e)(2) and (3)
- Department of Health and Human Services General Administration Manual Part 30, Environmental Protection
- 16 U.S.C. § 470, National Historic Preservation Act, Section 106, as amended
- Executive Order 12699 Seismic Safety of Federal and Federally Assisted or Regulated New Building Construction
- 45 CFR Part 15, Uniform relocation assistance and real property acquisition for Federal and federally assisted programs. Implements 42 U.S.C. 4601, et seq.
- 42 U.S.C. 4001 et seq., National Flood Insurance Act and National Flood Disaster Protection Act, as amended
- Executive Order 11990, Protection of Wetlands
- Executive Order 11988, Floodplain Management
- Executive Order 12898, Environmental Justice
- Executive Order 13287, Preserve America
- 16 U.S.C. § 1531 et seq., Endangered Species Act
- 16 U.S.C. § 3501 et seq., Coastal Barrier Resources Act
- 16 U.S.C. § 1451 et seq., Coastal Zone Management Act
- 33 U.S.C. § 1251 et seq., Federal Water Pollution Control Act, as amended. (Known as the Clean Water Act)
- 42 USC 7401, et seq., Clean Air Act
- 42 U.S.C. § 300f et seq., Safe Drinking Water Act, as amended
- 45 CFR § 74.16, 42 U.S.C. § 6901 et seq., Resource Conservation and Recovery Act (RCRA)
- 42 U.S.C. § 9601 et seq., Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended
- 16 U.S.C. §1271 et seq., Wild and Scenic Rivers Act

3. Use of Improved Information Technology

Applications and supporting documentation can be submitted electronically through HRSA's Electronic Handbooks system (EHBs).

4. Efforts to Identify Duplication

The information requested is specific to the requirements of NEPA and is not available elsewhere.

5. Involvement of Small Entities

This activity does not have a significant impact on small entities.

6. Consequences if Information Collected Less Frequently

Applicants requesting funds for construction must submit the EID to determine review and compliance requirements under NEPA and related laws in order for HRSA to administer funds responsibly. If such information is not submitted, HRSA will be unable to award funds as mandated under authorizing legislation.

7. Consistency with Guidelines in 5 CFR 1320.5(d) (2)

The data are collected in a manner consistent with guidelines contained in 5 CFR 1320.5(d)(2).

8. Consultation Outside the Agency

A 60-day Federal Register Notice was published in the *Federal Register* on December 27, 2018, vol. 83, No. 247; pg. 66718. There were no public comments.

In addition, HRSA consulted several outside users of the form on the proposed revisions and burden. Overall, the consultants agreed with the proposed revisions and the estimated burden.

Ms. Shirley Ellis-Stampley, BS, MBA
Chief Executive Officer
Jefferson Comprehensive Health Center INC.
405 Main Street
P.O. Box 98
Fayette, MS 39069
Email address: sellis2020@aol.com

Ms. Eileen Chang
Chief Financial Officer
Family Health Center
117 W. Paterson ST.
Kalamazoo, MI 49007
Email address: Eileen.Chiang@fhckzoo.com

Mr. Robert Tucker
Project Director
South Central Primary Care Center INC.
406 W 5th ST P.O Box 749

Ocilla, GA 31774-1421
 Email address: RTucker@scpccga.org
 Ms. Brenda Autry
 Finance Director
 Goshen Medical Center, INC
 P.O. Box 187
 Faison, NC 28341
 Email address: bautry@goshenmed.com

Ms. Ellie Tinto Poitier, MHA
 Health Center Employee
 Health Center Partners of South Carolina, INC.
 1708 OAK ST.
 Conway, SC 29526-3806
 Email: etintopoitier@gmail.com

9. Remuneration of Respondents

Respondents will not receive any payments or gifts.

10. Assurance of Confidentiality

This request does not involve the collection of individual level or personally identifiable information.

11. Questions of a Sensitive Nature

There are no questions of a sensitive nature.

12. Estimates of Annualized Hour Burden

HRSA estimates that approximately 1,500 grantees per year will apply for grants that are related to construction requiring an estimated burden of 1 hour per response to respond to the questions regarding compliance with NEPA.

The annual estimate of burden is as follows:

Form Name	Number of Respondents	Average Burden per Response (in hours)	Total Burden Hours	Total Wage Rate	Total Cost Burden Hours
EID Checklist	1,500	1	1,500	\$43.83*	\$65,745
Total	1,500		1,500		\$65,745

* The wage rate shown are based upon the current Bureau of Labor Statistics data for the hourly mean wage rate of an Environmental Engineer at <http://www.bls.gov/oes/current/oes172081.htm>

13. Estimates of Annualized Cost Burden to Respondents

There is no capital or startup cost for this activity.

14. Estimated Cost to the Federal Government

HRSA's Grants Policy office has determined that the estimated annual cost to the federal government for this activity is approximately \$500,000 for review of applicant information regarding compliance with NEPA.

15. Changes in Burden

The current burden inventory is 1,350 hours. This revision request is for 1,500 hours, an increase of 150 hours. This increase due to an estimated increase in the number of responses.

16. Time Schedule, Publication and Analysis Plans

There will be no statistical analysis done on the information received from EID. In addition, there will be no publication of the information reported.

17. Exemption for Display of Expiration Date

The expiration date will be displayed.

18. Certifications

There are no exceptions to the certification.