

**SUPPORTING STATEMENT FOR
EPA INFORMATION COLLECTION REQUEST NUMBER 1698.10
“REPORTING AND RECORDKEEPING REQUIREMENTS UNDER EPA’S WASTEWISE
PROGRAM”**

JUNE 2019

Table of Contents

Contents

Table of Contents.....	2
Table of Figures.....	5
I. IDENTIFICATION OF THE INFORMATION COLLECTION REQUEST.....	6
A. Title.....	6
B. Short Characterization.....	6
C. Data Management and Reporting System.....	6
D. WasteWise Overview.....	7
1. WasteWise Partners.....	8
2. WasteWise Endorsers.....	9
E. Overview of Challenges.....	10
1. Food Recovery Challenge (FRC) Overview.....	11
2. Electronics Challenge (EC) Overview.....	13
3. State Measurement Program (SMP) Overview.....	14
F. Existing Terms of Clearance.....	16
G. EPA’s Actions to Comply with Terms of Clearance.....	16
II. NEED FOR AND USE OF THE COLLECTION.....	17
A. Need and Authority for the Collection.....	17
1. WasteWise and Challenges Need:.....	18
2. State Measurement Program Need:.....	19
B. Practical Utility/Users of the Data.....	20
1. Practical Utility/Users of the WasteWise and Challenges Data.....	20
2. Practical Utility/Users of the State Measurement Program (SMP) Data.....	21
III. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA.....	22
A. Non-duplication.....	22
B. Public Notice Required Prior to ICR Submission to OMB.....	22
C. Consultations for WasteWise and Challenges.....	22
D. Consultations for SMP.....	23
E. Effects of Less Frequent Collection.....	23
F. General Guidelines.....	24

G.	Confidentiality.....	24
H.	Sensitive Questions.....	24
IV.	RESPONDENTS AND THE INFORMATION REQUESTED.....	24
A.	WasteWise Respondents.....	24
1.	Information Requested from WasteWise Partners.....	25
2.	Information Requested from WasteWise Endorsers.....	30
B.	FRC Respondents.....	34
1.	Information Requested from Food Recovery Challenge (FRC) Respondents.....	34
2.	Information Requested from FRC Endorsers.....	40
C.	Electronics Challenge (EC) Respondents.....	44
1.	Information Requested from Electronics Challenge (EC) Respondents.....	44
D.	State Measurement Program Participants.....	47
1.	Information Requested from SMP Template.....	47
2.	Information Requested from Resource Module.....	47
3.	Information Requested from Feedback Form.....	47
4.	Information Requested from Census.....	47
V.	THE INFORMATION COLLECTED — AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT.....	48
A.	Agency Activities.....	48
1.	Consensus and Collaboration Efforts -.....	48
2.	Quality Assurance/Quality Control -.....	48
B.	Collection Methodology and Management.....	48
C.	Small Entity Flexibility.....	48
D.	Collection Schedule.....	48
VI.	ESTIMATING THE BURDEN AND COST OF COLLECTION.....	48
A.	Burden Estimates.....	49
1.	Agency Justification.....	49
2.	Reasons for Change in Burden for WasteWise.....	49
B.	Cost Estimates.....	50
1.	Private Sector.....	50
2.	Public Sector.....	51
C.	Estimating Respondent Burden and Costs for WasteWise.....	52
1.	WasteWise Partners.....	52

2.	WasteWise Endorsers.....	55
3.	Estimating Respondent Costs for WasteWise.....	57
D.	Estimating Respondent Burden and Costs for the Food Recovery Challenge (FRC).....	60
1.	Estimating Respondent Costs for the FRC.....	60
2.	Reasons for Change in Burden for the FRC.....	61
E.	Estimating Respondent Burden and Costs for the Electronics Challenge (EC).....	62
1.	Estimating Respondent Costs for the EC.....	62
2.	Reasons for Change in Burden for Electronics Challenge (EC).....	63
F.	Estimating Burden and Costs for the State Measurement Program.....	63
1.	Estimating Burden Hours of the State Measurement Program.....	64
2.	Estimating Respondent Costs of the State Measurement Program.....	65
3.	Reasons for Change in Burden for State Measurement.....	65
G.	Estimating Agency Burden and Costs for WasteWise and related Challenges.....	65
1.	Estimating Agency Burden and Costs for the Challenges.....	66
2.	Estimating Agency Burden and Costs for State Measurement Program.....	69
H.	Estimating Respondent Universe and Total Burden and Costs for Waste Wise and related challenges.....	69
VII.	Appendix I.....	72
VIII.	Appendix II.....	74

Table of Figures

Table 1: Hourly Labor Rates (Private Sector).....	51
Table 2: Hourly Labor Rates (Public Sector).....	51
Table 3: Burden and Cost to Partners.....	54
Table 4: Burden and Cost for Endorsers.....	56
Table 5: WasteWise Membership.....	57
Table 6: Estimated WasteWise Partner Burden and Cost.....	58
Table 7: Estimated WasteWise Endorser Burden and Cost.....	59
Table 8: FRC Partners and Endorsers.....	60
Table 9: Estimated FRC Cost and Burden.....	61
Table 10: Burden and Cost for EC Partners.....	62
Table 11: Estimated Burden and Cost for the Electronics Challenge.....	63
Table 12: Estimated hours to complete SMP.....	65
Table 13: EPA and Contractor Proportional Cost.....	66
Table 14: Agency Costs and Burden.....	68
Table 15: Estimated Agency Cost of the SMP.....	69
Table 16: Total Burden Hours of WasteWise, Challenges and SMP.....	70
Table 17: Total Respondents in WasteWise, Challenges and SMP.....	70
Table 18: Exclusive Costs of SMM Programs.....	70
Table 19: Hosting and Maintenance Fees.....	70
Table 20: Summarized Agency Costs.....	70
Table 21: Aggregated Total Cost of WasteWise, Challenges and SMP.....	71
Table 22: State Government Burden.....	71
Table 23: Private Sector Summary.....	71
Table 24: Surveyed Cost and Burden from SMP Participants.....	72
Table 25: Estimated SMP Commitment from Regional Response.....	74

I. IDENTIFICATION OF THE INFORMATION COLLECTION REQUEST

A. Title

The Environmental Protection Agency (EPA) requests renewal of control number 2050-0139 (ICR 1698.10): *EPA's WasteWise Program*.

B. Short Characterization

This submission is intended to request renewal and amendment of an ICR for the WasteWise Program which includes several waste reduction challenges that target specific materials or sectors previously included under approved WasteWise-related ICRs, as described in this document. The Environmental Protection Agency's (EPA or the Agency) existing ICR submitted on June 23, 2011 and approved on June 21, 2016, with Terms of Clearance, for a three-year period. The existing ICR encompassed WasteWise and multiple Challenges and is set to expire on June 30, 2019. EPA's efforts to comply with the Terms of Clearance are discussed below.

WasteWise is a program to minimize waste by encouraging participants to consume less and reuse more. Challenges are a component of the WasteWise program and target a particular sector or material. The existing ICR was approved for Waste Wise and two challenges which include a Food Recovery Challenge (FRC) and an Electronics Challenge (EC). This renewal also requests approval for another challenge focused on state governments called the State Measurement Program (SMP). As noted in previous renewals, EPA uses an integrated online web-based data management system to collect, manage and report data. A description of all the program elements are described below. The system is considered as one data base with multiple platforms for the separate program elements to ensure accurate, complete and comprehensive reporting in an effective and efficient manner.

C. Data Management and Reporting System

Over the years EPA has realized a need to collect and manage data in a more accurate, fluid and efficient manner both for its own purposes and in response to participants enrolled in its voluntary partnership. Prior efforts to use static lists or spreadsheets of exported data did not serve the need organizations had to access systems for collecting and managing raw data.

EPA began investigating the use of an automated database system for its WasteWise program over a decade ago after identifying a need to streamline data collection, report on participant achievements efficiently, and provide additional support to participants. This work included testing designs and system platforms to host the collection of data points approved under the existing ICR. In 2008, EPA began developing a customized portal in Re-TRAC Connect™ a commercial waste management database platform. The system was designed to collect data points previously approved under EPA's existing ICR. The system was launched in 2010, and since then, EPA has collected and stored all relevant data in the online data management and reporting system, in accordance with control number 2050-0139. EPA uses the information collected to track the activities of individual organizations participating in WasteWise and the challenges, recognize partner accomplishments, and identify effective waste reduction strategies to share with the other organizations. ICR forms previously approved were translated into a

user-friendly online format. For example, the online system walks WasteWise Partners through the Partner Annual Data Forms page-by-page until all data is entered. Also, users can select from convenient drop-down menus that are populated with the most commonly observed data and “other” options as needed (e.g., most commonly recycled materials). Users can access Re-TRAC Connect™ at their convenience, at any time, and at no charge. Participants can save information and return to it later for editing. Data can be saved and edited until it is submitted for Agency review during the formal reporting seasons for each program.

D. In addition to collecting information from participants, Re-TRAC Connect™ also provides members with internal tracking and customized reporting functions. It also uses EPA’s Waste Reduction Model (WARM) to quantify the environmental benefits of partner actions. EPA staff have various administrative rights and reporting functions as well for improved data quality, reporting and program management. Consideration has been given to adopting life-cycle modeling to help quantify broader system environmental and job creation benefits, but no concrete plans exist to expand existing analytics to include these types of factors. [WasteWise Overview](#)

WasteWise is an EPA partnership effort that encourages companies, non-profit organizations, state/local/tribal/federal governments, schools, colleges, and universities to engage in waste reduction activities. WasteWise activities focus on waste prevention, materials management, recycling collection, composting, donation, reuse, and purchasing or manufacturing recycled-content products. WasteWise was developed and is managed by EPA’s Office of Resource Conservation and Recovery (ORCR), Resource Conservation and Sustainability Division (RCSD).

WasteWise began in 1994 and since then has helped more than 4,000 organizations, including small, medium, and large businesses; local and state governments; federal agencies and other public and private sector organizations plan, develop, and implement cutting-edge waste reduction programs and measure their results. It was one of the first programs developed to specifically focus on waste prevention and recycling to bring about waste reduction and provide environmental benefits, while at the same time reducing overall organizational costs. WasteWise provides one-on-one technical assistance, tools, and resources to assist member organizations in designing waste reduction programs that are flexible yet tailored to their individual needs. WasteWise offers a program-specific online web-based data management and reporting system to track and report partner progress in the program. Mentoring opportunities are also available to allow like-sector organizations the benefit of implementing waste reduction program elements that are proven to work.

For twenty-five years, WasteWise has been viewed nationally, as well as internationally, as a model to help organizations bring about waste reduction in a cost-effective manner. Many States and major cities promote the use of WasteWise to help organizations in their State achieve greater waste reduction. Over the years, several international government agencies have consulted with EPA and tailored their national partnership programs after the WasteWise model. It has become apparent over the years that

WasteWise provides a cadre of resources and technical assistance that are unique in promoting waste reduction and obtaining measurable results.

In return for their participation in the program, active WasteWise Partners and Endorsers receive:

- A well-developed program design approach to assist document results that can be implemented within a variety of organizations;
- Recognition opportunities through annual awards, the WasteWise website and other WasteWise outreach materials;
- Opportunities to network with individuals implementing waste reduction activities in a variety of industry sectors;
- Access to an online web-based data management and reporting system to facilitate internal tracking and allow for better waste and materials management;
- Technical assistance through a Helpline, program representative, and listserv services and electronic media that assist with the identification of waste reduction opportunities, setting measurable goals, and researching technical questions;
- Access to a library and website of technical assistance resources to assist in achieving waste reduction goals; and
- A climate benefits profile which provides a summary of the amount of equivalent greenhouse gas (GHG) reductions that results from a partner's waste prevention and recycling efforts.

1. WasteWise Partners

Partner participation begins when an organization submits an online Partner Registration Form (Section A.a) that provides general information. Partners submit a Partnership Agreement Form committing them to identify specific goals, make continuous waste reduction improvements, and report data to remain an active Partner in the program (Section A.b). Organizations that fulfill their partnership commitments are considered "active" partners and receive benefits including access to the online data management system, name in the Partner listing on the WasteWise Website, and ability to use the WasteWise logo to show they are enrolled in WasteWise. Organizations that do not meet their commitments become "inactive" have their access to the online data management system revoked; names removed from the Partner listing on the WasteWise Website and are not allowed to use the WasteWise logo. Partners can regain "active" status by fulfilling all data management and reporting requirements.

Partners can establish reporting protocols as a single entity or for multiple facilities within their organization. Partners are allowed up to 90 days to provide baseline data and baseline goals in the areas of waste prevention; recycling; buy-recycled and/or manufacturing products with recycled content via the Partner Baseline Data and Partner Baseline Goal Forms (Section A.c). The first year of membership is the only time during which partners are asked to submit baseline data and baseline goals. Partners use the Partner Annual Data form (Section A.e)) to submit annual data every year that they are active in WasteWise. They also submit Partner Annual Goal Forms (Section A.d) each year to set quantities and methods of established waste reduction goals. By comparing the baseline data to subsequent annual data, EPA can determine a partner's waste reduction achievements over time. In addition, partners applying for annual awards notify EPA by submitting through awards form (Section A.g).

WasteWise currently has 880 active partners (as of October 2018). EPA expects WasteWise membership to increase by 50 active partners during each year of this ICR. While there is no cost to join as a

WasteWise Partner, the information collection activities are estimated on average to cost each partner organization approximately \$3,553 the first year they are in the program and \$3,052 each subsequent year. However, EPA also expects that for many of the organizations, these costs will be off-set to realize substantial cost savings through implementation of their waste reduction initiatives reported under WasteWise..

2. WasteWise Endorsers

WasteWise also includes another enrollment status called “Endorsers.” Various organizations, including non-profit organizations, and federal, state, and local governments, become WasteWise Endorsers and commit to recruiting their members and other constituents to become WasteWise Partners. Many WasteWise Endorsers go on to provide ongoing promotional and/or technical waste reduction information.

Joining WasteWise as an Endorser involves submitting an online Endorser Registration Form (Section A.a), which provides general contact information, the number of business members the organization has, the primary business sectors represented, and the activities that the endorser will conduct. Endorsers are required to submit an Endorser Agreement Form (Section A.b) which commits them to identify specific actions they are required to take to remain an active participant in WasteWise. Endorsers are also required to submit goals for their first year of participation using the Endorser First Year Goals Form (Section A.c). After the first year of enrollment and for every subsequent year, Endorsers are required to report annual results from their endorser activities using the Endorser Annual Data Forms (Section A.d). Annual data should represent a quantification of Endorser activities undertaken during the previous calendar year, capturing the number and type of promotional events held and number of people for which promotional information was presented or provided during the prior 12-month period. Endorsers are also required to submit an Endorser Annual Goals Form (Section A.e) establishing goals for endorser activities for the upcoming calendar year. Both the annual data and goals forms are to be submitted by March 31 of each year. Organizations that fulfill their Endorser commitments are considered active Endorsers and receive benefits including access to the online data management system, name in the Endorser listing on the WasteWise Website, and the ability to use the WasteWise logo. Organizations that do not submit annual data and goals become inactive and have their access to the online data management system revoked; names removed from the Endorser listing on the WasteWise Website; and are not allowed to use the WasteWise logo. Endorsers can regain “active” status by fulfilling all data management and reporting requirements.

EPA will track the reported data from the Endorser forms to better understand the activities being undertaken by each endorser and identify opportunities to assist them in their efforts (e.g., providing promotional materials, answering technical questions, or clarifying participant requirements, etc.) Some WasteWise Partners may also choose to enroll Endorsers. In these instances, the organization must submit separate registration forms, agreement forms, and all related reporting and goal forms required for both Partners and Endorsers. In addition, Endorsers applying for annual awards notify EPA by submitting through awards form (Section A.f) and submit a short narrative describing their activities.

WasteWise currently has 425 active Endorsers (as of October 2018). EPA expects Endorser enrollment to increase by 10 active Endorsers during each year of this ICR. While there is no cost to join WasteWise as an Endorser, the information collection activities are estimated on average to cost each endorser organization approximately \$185 in their first year in the program and \$218 each subsequent year.

While Endorsers are unlikely to realize cost savings from their WasteWise activities, Partners that join WasteWise because of WasteWise Endorser activities are expected to realize cost savings from reducing their consumption of resources and reusing materials.

WasteWise also allows Endorsers who have members to create a WasteWise Affiliate Network. Through the Affiliate Network, Endorsers can use WasteWise to track their members' progress in waste reduction. Affiliate organizations' members join WasteWise as Partners and the Endorser is then given access to the member organizations reported data. This allows the Endorser to better organize and track their members' waste reductions efforts. The number of organizations involved in Affiliate Networks and their costs per year to participate in WasteWise is captured in the number of Partners and Endorsers discussed above.

E. Overview of Challenges

According to EPA's Facts and Figures report, materials like food and electronics have become a growing concern due to their resource implications and change in the material streams. In response, EPA has targeted these materials for action and developed program initiatives to address these concerns. While WasteWise is broad focused (all types of organizations and all materials), the challenges offer participants a streamlined opportunity to target selected materials or sectors. The three challenges include the Food Recovery Challenge (FRC), the Electronics Challenge (EC), and the Federal Green Challenge (FGC). All challenges will use EPA's data management and reporting system platforms to collect data and information specific to the individual Challenges as discussed below. Since the Federal Green Challenge will only be accessible to federal agencies and does not require ICR approval, that Challenge is not discussed further in this ICR renewal.

1. Food Recovery Challenge (FRC) Overview

The FRC promotes reducing food waste by encouraging participants to reduce the amount of food purchased and prepared for serving; composting food waste and scraps; and donating leftover food. Although any organization can join the Challenge, the FRC targets specific large-quantity food waste generators, which include: colleges and universities; sports and entertainment venues; and grocers. Other sectors that have been solicited to join the Challenge, include the hospitality sector, grocers, restaurants and hospitals.

a) FRC Participants

Organizations become FRC Participants by submitting an online Partner Registration Form (Section B.b) that provides general information. Participant's submit a Partnership Agreement Form (Section B.c) committing them to identify specific goals, make continuous waste reduction improvements, and report data to remain an active Participant the Challenge. Organizations that fulfill their partnership commitments are considered "active" participants and receive benefits including their access to the online data management system and their name listed on the FRC website. Organizations that do not meet the requirements of the Challenge become "inactive" and have their access to the online data management system revoked and names removed from the participant list on the FRC website. Participants can regain "active" status by fulfilling all data management and reporting requirements.

Participants in the FRC Challenge can establish reporting protocols as a single entity or for multiple facilities within their organization. Participants are allowed up to 90 days to provide baseline data and baseline goals in the areas of waste prevention; composting or food donation via the Baseline Goals and

Baseline Data Forms (Sections A.c)A.d). Baseline data represents the amount of waste reduction a participant achieved over the twelve-month period prior to joining the FRC Challenge. The baseline goals represent the incremental increase in waste reduction (above the baseline year) that the participant plans to achieve in the first full year after joining the Challenge. Baseline Data and Baseline Goals can be reported for either “summary activities” or “detailed activities” (but not both) depending on the level of specificity the participant wants to report. The first year of membership is the only time during which participants are asked to submit baseline data and baseline goals. Participants use Annual Data Forms (Section B.f) and Annual Goals Forms (Section B.g) to report data after their first year of involvement in the Challenge and for all subsequent years. Again, participants may choose to enter and report data for “summary activities” or “detailed activities” (but not both) depending on the level of specificity they choose. By comparing the baseline data to subsequent annual data, EPA can determine a participant’s increase in waste reduction, both on an annual basis and over time. Participants that do not submit the requisite data within prescribed timeframes are moved to an “inactive” status until they comply with all reporting requirements. All FRC participants are considered for “data driven” awards annually based upon the data submitted to the in the data management and reporting system, so no formal award application is required. In addition, participants and endorsers can apply for “narrative” awards through an online application process (Section B.h).

The FRC currently has 593 active participants (as of October 2018). EPA expects FRC to increase by 40 active partners during each year of this ICR. While there is no cost to join as an FRC participant, the information collection activities are estimated on average to cost each partner organization approximately \$3,679 the first year they are in the program and \$3,160 each subsequent year. However, also expects that for many of the organizations, these costs will be off-set through cost savings by implementation of their waste reduction initiatives undertaken as part of their participation in the FRC.

b) FRC Endorsers

FRC also includes another enrollment status called “Endorsers.” Various organizations can choose to become FRC Endorsers and commit to recruiting other organizations to become FRC participants. Endorsers can also provide ongoing promotional and/or technical waste reduction information as it pertains to food waste.

Joining the Food Recovery Challenge (FRC) as an Endorser involves submitting an online Endorser Registration Form (Section B.a), which provides general contact information, the number of business members the organization has, the primary business sectors represented, and the activities that the endorser will conduct. Endorsers are required to submit an Endorser Agreement Form (Section B.b) which commits them to identify specific actions they are required to take to remain an active Endorser in the FRC. Endorsers are also required to submit goals for their first year of participation using the Endorser First Year Goals Form (Section B.c). After the first year of enrollment and for every subsequent year thereafter, Endorsers are required to report annual results from their endorser activities using the Endorser Annual Data Forms (Section B.d). Annual data should represent a quantification of Endorser activities undertaken during the previous calendar year, capturing the number and type of promotional events held and number of people for which promotional information was presented or provided during the prior 12-month period. Endorsers are also required to submit an Endorser Annual Goals Form

(Section B.e) establishing goals for endorser activities for the upcoming calendar year. Both the annual data and goals forms are to be submitted by March 31 of each year. Endorsers that meet their reporting and goal setting requirements will be in an “active status” and receive benefits including access to the online data management system and name in the Endorser listing on the FRC website. Endorsers that do not submit all requisite data and goals are moved into “inactive status,” and will have their access to the online data management system revoked and their names removed from the Endorser listing on the FRC website. Endorsers can regain “active” status by fulfilling all data management and reporting requirements. Endorsers can apply for annual “narrative” awards by submitting the online FRC awards form (Section B.f).

EPA will track the reported data from the Endorser forms to better understand the activities being undertaken by each Endorser and identify opportunities to assist them in their efforts (e.g., providing promotional materials, answering technical questions, or clarifying participant requirements, etc.). Some FRC participants may also choose to enroll as FRC Endorsers. In these instances, the organization must submit separate registration forms, agreement forms, and all related reporting and goal forms required for both Participants and Endorsers.

The FRC currently has 54 active Endorsers (as of October 2018). EPA expects Endorser enrollment to increase by five active Endorsers during each year of this ICR. While there is no cost to join the FRC as an Endorser, the information collection activities are estimated on average to cost each endorser organization approximately \$322 in their first year in the program and \$173 each subsequent year. While Endorsers are unlikely to realize cost savings from their FRC activities, organizations that join the FRC because of FRC Endorser activities are expected to realize cost savings from reducing their consumption of resources and reusing materials.

2. Electronics Challenge (EC) Overview

The EC was designed to advance the responsible management of used electronics by challenging participants (limited to electronics manufacturers and retailers) to voluntarily commit to taking specific actions. Organizations capable of joining the EC include manufacturers and retailers of electronic equipment. Participants are required to commit to sending 100% of used electronics collected for reuse and recycling to third-party certified recyclers, increasing the total amount of used electronics collected for reuse and recycling, and publicly posting information and data about their EC efforts.

Participants can enroll in the Challenge at various levels of commitment, which include: bronze; silver; or gold memberships. The specific participatory requirements increase from the lowest (bronze) level to the highest (gold) level.

a) EC Participants

The EC targets major manufacturers and retailers of electronics equipment. As of October 1, 2018, the EC had a total of 11 participants and this number is not expected to increase. EPA has no plans to increase participation in this Challenge above the current members during the period for which this ICR would be approved.

Organizations become EC Participants by submitting an online Partner Registration Form (Section C.a) that provides general information. Participant’s submit a Partnership Agreement Form identifying their

level of enrollment (Bronze, Silver or Gold) and committing to provide all requisite data and information associated with their chosen enrollment level. Each level has varying requirements, with the Gold level requiring the most involvement by the participant. Like the other Challenges, EC participants submit Baseline Data Forms and Annual Data Forms for their specified level of enrollment. In addition, EC participants can submit an Annual Participation Level Form identifying at what enrollment level they plan to participate in for the following reporting year. This form would be used, for example, by a participant who enrolled at the Silver membership level and then wanted to increase their activities and move to the Gold level. Finally, the EC has developed an online Electronics Challenge Award Application that can be submitted by any participant who wants to be considered for an annual award. As previously mentioned, participants in the EC can opt to participate at either a Bronze, Silver or Gold level. For this ICR, all EC participants are assumed to be enrolled and to already be participating at the Gold level. This means that, for the purposes of estimating cost burden, all EC participants will only be required to submit annual data (i.e., they will not need to register, submit participation agreements, or submit one-time baseline data, etc.).

Organizations that fulfill their partnership commitments are considered “active” participants and receive benefits including access to the online data management system and by having their name listed on the EC website. Organizations that do not meet the requirements of the Challenge become “inactive” and have their access to the online data management system revoked and names removed from the participant list on the EC website. Participants can regain “active” status by fulfilling all data management and reporting requirements.

This ICR assumes that all 11 EC enrollees are already participating at the Gold level and while there is no cost to join as an EC participant, the information collection activities are estimated on average to cost each participating organization approximately \$8,382 per year. As previously mentioned, all participants in the EC have already been enrolled and have submitted baseline data so no costs for those activities will be accrued during year one of this ICR. Only annual costs are identified in this ICR.

As discussed earlier, the WasteWise, Food Recovery Challenge and Electronics Challenge data management platforms were included in the previous ICR. At the time of the previous ICR submittal, the FRC and EC platforms were developmental and burden estimates were based on prospective program enrollment. This renewal includes data elements and cost estimates for the FRC and EC platforms that are fully developed and is also adding the State Measurement Program (SMP) platform.

3. State Measurement Program (SMP) Overview

State Measurement Program (SMP) is designed for a voluntary collaboration of state governments to develop a common template of solid waste management data (regarding waste, recycling, composting, other waste diversion, waste to energy, disposal, and materials management). State participants will enter data once annually. Following the annual reporting period, state have access to analytic reports for their own data as well as data across all participating states. The common framework will help align state information and data to allow them to better understand what is happening across states and identify best practices. .

There are four parts of the SMP: Annual State Measurement Template for the quantitative data; Resource Module for the qualitative data; State Demographic Template and a State Feedback Form.

a) State Measurement Template

The State Measurement Template (Section III.1.) involves 15 questions on six webpages with instructions and links to documents including a Data Dictionary, Material flow Diagram, and implementation team.

Each question is designed to allow each state the maximum flexibility on the type, amount and character of the data shared with other states. Each question provides for a Yes (I have detailed numbers), No (I only have total numbers) or I don't have this information. Each question also provides for comment boxes for each state to provide additional clarifying and distinguishing information. States wanted to be able to make quality comparisons which is afforded with consensus definitions and explanations of differences.

Template begins with an opportunity for states to highlight major changes, success stories, new ideas or items of note with a comment box. This is followed by the 15 questions and their broad and detailed subparts covering solid waste disposal by destination, material type and tons; waste imports and exports; recycling; other waste diversion activities like composting, reuse and beneficial use; recycling collection systems; recycling system types; pay as you throw programs; organics management systems; disposal system types; hauler information statistics; remaining landfill capacity; tipping fee gates charges; some state qualitative information on budgets and fiscal years; state staffing; program funding; and local government funding.

b) State Resource Module

State Resource Module (Section III.2.) provides qualitative program information for each state covering planning; key policy drivers (goals, solid waste management hierarchy, mandated recycling and other); and key governmental material and waste management strategies (source reduction, life-cycle based approaches, product stewardship, recycling market development, State government Environmentally Preferable Purchasing (EPP), Pay as You Throw (PAYT), material or product-specific waste prevention or recycling strategies).

c) State Feedback Form

The purpose of the State Feedback Form (Section III.3.) is to identify common grounds and gain feedback to ensure that there is integrity in the data collection and reporting process. Questions deal with terms, definitions, any missing topics along with requesting state definitions of Municipal Solid Waste (MSW) and recycling and how states calculate State Recycling and Diversion Rates. This information is used to facilitate comparisons and understandings of each states programs, data and approaches with emphasis on program and system enhancements and improvements.

d) State Demographic Information

Each year the database prepopulates template forms with current state demographic information from the U.S. state population census. A few states prefer to use their own numbers, so this template provides states the opportunity to review the prepopulated numbers and adjust to their own needs (Section III.4.).

[Existing Terms of Clearance](#)

EPA received ICR renewal approval for WasteWise and its challenges on June 21, 2016, with Terms of Clearance, for a three-year period. (ICR Reference number 201106-2050-001.) The existing ICR encompassed WasteWise and challenges is set to expire on June 30, 2019. EPA's efforts to comply with the Terms of Clearance are discussed below. Under the ICR's Terms of Clearance, EPA was required to evaluate the statistical methods from published literature to quantify the contribution of voluntary program's impact on partner behavior using randomized control trials (RCTs) and subject the methodology to participant actions. The terms specifically direct EPA's National Center for Environmental Economics (/NCEE) to undertake one to three case studies to examine the potential role that voluntary programs play in participant actions. EPA is expected to report progress on these efforts as part of this ICR renewal request.

F. EPA's Actions to Comply with Terms of Clearance

To improve its ability to meaningfully evaluate the contributions of voluntary programs in the absence of readily available, high quality, or detailed data, particularly on non-participants, the EPA (NCEE) has initiated a project to investigate the potential role that voluntary programs have played in participant actions. EPA's empirical literature to-date has mainly focused on evaluating the effectiveness of large, multi-sector, voluntary environmental programs with explicit environmental goals (e.g., Green Lights, Energy STAR, 33/50) where panel data on participants and non-participants are available. Evidence regarding their causal effectiveness is mixed. Some research find they have no effect on the emission reductions of participating firms relative to non-participants. Others studies find that, while some emission reductions are attributable to the voluntary program in question, these are often lower than originally estimated. Relatively little is known about the impacts of many voluntary environmental programs due in part to limited data on non-participants.

The EPA's efforts to comply with the Terms of Clearance are designed to illustrate what types of empirical analyses may be feasible for different types of programs given data currently available. EPA (NCEE) analysts seek to answer questions such as: Do participants significantly reduce waste or emissions after joining the program? Do reductions systematically differ by sector or region? Do participants that joined earlier report baseline information, submit data to the program more regularly, or make greater reductions in waste or emissions over time after joining the program? Do participants that had previously been doing more to reduce waste continue to make greater reductions in waste or emissions after joining the voluntary program?

To determine the case studies to analyze, EPA (NCEE) analysts identified about 30 voluntary programs via web search and meetings with all the program offices currently administering one or more of these programs. The initial list of 30 was narrowed to ten based on several criteria: EPA involvement (vs. third party), currently active, requires Information Collection Request (ICR) approval from OMB, systematically collects data from partners, has explicit facility/company partners, and is not already relatively well-studied.¹

¹ The ten voluntary programs are Landfill Methane Outreach Program (LMOP), Natural Gas STAR, GreenChill, Combined Heat and Power (CHP) Partnership, SmartWay, Safe Choice, WasteWise, Green Power Partnership, Responsible Appliance Disposal (RAD), and Sustainable Materials Management (SMM) Electronics Challenge.

EPA analysts next surveyed the literature to identify possible frameworks for assessing voluntary programs that might aid in identifying the best candidates from the shorter list to serve as case studies. In general, studies characterize voluntary programs as taking one or more of the following approaches (Brouhle, et al 2005; Boyd & Mason 2011):

- Set explicit voluntary environmental goal to account for cost of pollution
- Provide “signaling features” – awards, logos, labels - to address information asymmetry
- Offer technical assistance to address underinvestment in R&D
- Promote profit-enhancing, emission-reducing strategies to address behavioral anomalies (e.g., when firms fail to act in own self-interest)

In addition, Brouhle, et al. (2005) notes that single sector programs often focus on narrower environmental objectives and have fewer participants than multi-sector programs.

Using these frameworks, EPA analysts characterized each of the ten programs already identified by their goal(s), size, sectoral coverage, technical assistance, and signaling features.

To date, EPA (NCEE) has identified two voluntary programs as case studies and has begun to collect and clean data, assess the types of questions to evaluate empirically, and run some initial specifications. NCEE is still undergoing its evaluation and analysis. The EPA anticipates that they will be completed in late Summer 2019. The case studies selected are: WasteWise, which encourages firms across a wide variety of sectors to reduce, recycle and reuse industrial waste; and GreenChill, which encourages food retailers to reduce refrigerant emissions. Both programs ask partners to set explicit environmental goals and offer some form of technical assistance. WasteWise is relatively large – approximately 1,900 partners (active and archived) – while GreenChill counts about 60 firms as partners and certifies over 200 individual stores that meet explicit criteria.

NEED FOR AND USE OF THE COLLECTION

G. Need and Authority for the Collection

As stated by Congress (42 U.S.C. #13101-13103. 1990) and EPA (The Solid Waste Dilemma: An Agenda for Action. 1989 530-SW-89-019. pp. 16-21), there are significant opportunities to reduce or prevent source pollution at the source through cost-effective changes in production, operation, and raw material use. The Agency has developed a hierarchy asserting that waste should be prevented or reduced at the source whenever feasible and waste that cannot be prevented should be recycled where possible. The Resource Conservation and Recovery Act (RCRA) directs EPA to “...promote the protection of human health and the environment and to conserve valuable materials and energy resources ...” (42 section 6902(a)) and “...promote the demonstration, construction, and application of solid waste management, resource recovery, and resource conservation systems which preserve and enhance the quality of air, water, and land resources ...” (“...” (42 section 6902(a)(10)). In addition, “The Congress finds that (1) significant savings could be realized by conserving materials to reduce the volume or quantity of material which ultimately becomes wastes; (2) solid waste contains valuable energy and material resources which can be recovered and used thereby conserving increasingly scarce and expensive fossil fuels and virgin materials...” (Section 4001(a)).

Information activities associated with WasteWise and its challenges will assist the EPA in meeting RCRA objectives to better track the generation and recovery of materials by facilitating data collection and sharing among program participants.

Section 8001(a) and Section 8003(c) of the RCRA provide for broad authority to provide information and assistance. “The Administrator, shall conduct, encourage, cooperate with, and render financial and other assistance on research, investigations, experiments, training, demonstrations, surveys, public education programs, and studies relating to resource conservation systems, among other issues.” “The Administrator shall implement a program for the rapid dissemination of information on topics that include resource conservation, and methods and information on any other technical, managerial, financial, or market aspect of resource conservation and recovery facilities.

“The Administrator shall develop and implement educational programs to promote citizen understanding of the need for practices that include resource conservation.”

Section 8001(b) of the RCRA states, “In carrying out functions pursuant to this Act, and any other Federal legislation respecting solid waste or discarded material research, development, and demonstrations, the Administrator shall establish a management program or system to insure the coordination of all such activities.”

1. WasteWise and Challenges Need:

Information activities associated with WasteWise and the Challenges will assist EPA in meeting the objectives of RCRA by facilitating the prevention and recycling of wastes at participating organizations and promote the reuse of materials in the manufacture of new products.

EPA uses forms to collect initial information from participants that formally establish participation in WasteWise and the Challenges. Participants also commit to take certain actions to remain in “active status.” General information about new WasteWise and Challenge participants is obtained through the use of the forms to include: the facilities committed to implementing the requisite initiatives relating to waste prevention, recycling, and buy/manufacture recycled-content products; and insight on new participants’ areas of interests and/or priorities.

EPA also needs to collect information pertaining to each participant’s annual results and specific goals for the upcoming year to better understand and assist each participant’s waste reduction efforts, to check their progress on reducing waste, and to identify effective waste reduction strategies to share anonymously with other participants. Furthermore, as mentioned earlier, by compiling partners’ baseline waste reduction data, WasteWise and the Challenges will be able to more accurately determine the long-term progress made by its participants in their waste reduction efforts. Participants can also submit forms to apply for annual awards.

For the participants that are Endorsers in either WasteWise or the FRC, EPA needs to collect initial information to establish participation as an Endorser and to obtain general contact and membership information, as applicable. EPA also needs to ensure that Endorsers have actionable requirements that can be forecast, completed and measured, just like other participants. Once Endorsers are registered and sign their agreement form, they must complete and submit first year goals that identify activities they plan to execute during the first year of involvement. Endorsers are required to report on annual achievements and set annual goals for the upcoming year.

All information and data collected under WasteWise and the Challenges undergo quality assurance and quality control (QA/QC) by assigned database management administrators who have access to all forms and records submitted by participants. All data undergoes a thorough review using quantitative and qualitative analysis prescribed in a standard QA/QC protocol. Questionable or inconsistent data is referred to the participant for explanation and clarification. Only after the data has been vetted and reconciled is the data verified and locked in the system. Further access to the data by participants is prohibited unless the access is provided and monitored by a highly skilled and trained system administrator.

2. State Measurement Program Need:

The annual Facts and Figures Report (formerly the MSW Characterization Report) report is one of the most cited documents for the Office of Resource Conservation and Recovery. There have been extensive efforts to expand, enhance and improve the underlying data, methodology and analysis provided. This report only provides a national snap shot of municipal solid waste generation and their pathways in the U.S. economy. It does not provide local, state or regional perspectives. Comments submitted on [Federal Register Notice Docket # EPA-HQ-RCRA-2011-1078](#) back in 2011 focused on “soliciting stakeholder input regarding the efficacy and scope of the MSW Characterization Report called “Municipal Solid Waste in the United States” as part of a broader discussion about sustainable materials management. “This information will be used to develop new measurement definitions and protocols for measurement of these materials, as well as the possible addition of construction and demolition (C&D) materials and non-hazardous industrial materials to the list of materials addressed in future efforts. This effort could lead to the creation of a new measurement report that the U.S. Environmental Protection Agency will make publicly available.”

EPA received 159 submittals from diverse stakeholders of 137 individuals and organizations, including: 30 individuals; 28 non-government organizations; 22 corporations; 20 trade associations; 10 states; 9 local governments, 9 consultants; 5 colleges and universities; 2 Federal agencies; 1 Tribe and 1 Press. There was major support to continue with the existing measurement report with enhancements, expansions and improvements plus a significant desire to get more regional, state, local data that the national snapshot in our report fails to provide. This long-term effort by the states, EPA regional and headquarters staff finally brings this specific request to reality. The Facts and Figures Report provides a national snapshot of resource conservation of non-hazardous waste, specifically Municipal Solid Waste (MSW) from a top down (mass balance and material flow basis). The SMP provides ground up data at the state level. Each provides different and unique perspectives and measurements. To bring about better metrics, models for success and overall national improvement, the ground up data should fill in some of the gaps in understanding and provide greater opportunities to improve data quality. It provides opportunities to enhance, improve and expand the existing Facts and Figures Report; fulfill numerous requests that the agency has been getting for years for more state data and trends while creating new metrics for success at the state level.

H. Practical Utility/Users of the Data

1. Practical Utility/Users of the WasteWise and Challenges Data

The information and data collected for WasteWise and the Challenges is not required for regulatory purposes by ORCR or any other EPA office. These data are reported by individual participants as a condition of their enrollment and to remain in an “active status.” The data represents participant’s

progress they make towards waste reduction goals, including waste prevention, recycling collection, and buying or manufacturing recycled-content products activities (optional data field). EPA does not conduct facility audits of WasteWise or Challenge participants; however, a quality assurance quality assurance (QA/QC) process is in place to review participant data for accuracy and verify all submitted data. Details of this process are discussed in Section 2a. EPA provides tools, technical assistance, and mentoring opportunities to assist members in planning, developing, and implementing their waste reduction goals and activities. Often this assistance allows participants to set higher waste reduction goals and achieve greater results than originally anticipated.

Specifically, EPA uses the information collected in the Registration and Participant Agreement Forms to set up and edit online accounts in the database system as requested by the participating organization. EPA uses the information collected in the Annual Data and Annual Goals Forms to track the participant's activities and progress in the data management and reporting system; identify, develop, and disseminate case studies and other materials on key waste reduction practices; identify areas where additional technical assistance or information would be useful for individual participants or more generally for program participants (e.g., high recycling figures for corrugated containers might indicate an opportunity for transport packaging reductions); recognize organizations with significant waste reduction accomplishments; evaluate opportunities for improving WasteWise and the Challenges, and measure participant progress as well as progress towards sustainable materials management goals. Data collected on forms also allows EPA to ensure that all participants are fulfilling the requirements to remain in an "active status." ***EPA used to publish WasteWise participant results in an annual report, however, this report has not been published since 2008 and there are no plans to publish future reports of this nature.***

EPA uses the general information collected in the **Endorser Registration Form** to set up and edit online accounts in the database system as requested by the participating organization.

EPA uses information collected in the Endorser Annual Data and Annual Goals Forms to track activities, progress and to ensure the Endorser is fulfilling all requirements for participation in either the WasteWise or any of the Challenges.

Data collected by WasteWise or any of the Challenges is referred to as "reported data." EPA does not portray any such data as being directly attributable to a participant's involvement in an EPA program or EPA's influence on participant behavior.

2. Practical Utility/Users of the State Measurement Program (SMP) Data

The information and data collected is not required for regulatory purposes by ORCR or the other EPA offices. The data system was built by the states, for the states and reported by the individual states to share with each other, EPA and the stakeholders and the public. EPA provides facilitation, mentoring and technical assistance to the states to maintain, expand, improve and enhance the effort each year. EPA provides an annual quality assurance process to provide accurate up to date data collection. Now that a robust ground up data system is in place, there are opportunities to create more metrics and comparisons of success in various material management programs.

William Thompson aka Lord Kelvin in 1883 said it best, "What gets measured gets managed." Speedometers, compasses, the economy, stock markets all have metrics and trend lines that facilitate people knowing where they are and where they are going. In the waste and material management world, the measurements that states want, and need are generally found in this program.

Specifically, EPA uses the information collected in the Module to provide summaries on state programs for conferences, blogs, PowerPoints and answering stakeholder and public inquiries regarding material and waste management in the United States. EPA uses selected information collected in the State Measurement Template to facilitate the broader measurement improvement efforts with the annual *Advancing Sustainable Materials Management: Facts and Figures* report and in the underpinnings of selective data assumptions and methodologies used in that report. EPA also uses this information to provide summaries on state programs for conferences, blogs, PowerPoints and answering stakeholder and public inquiries regarding material and waste management in the United States. However, when doing this EPA does not assert any direct correlation or attribution between EPA efforts to promote waste prevention, recycling, source reduction, materials management activities and reported results. **EPA does not portray any such data results as being directly attributable to EPA's influence on participant behavior.**

The vision and end goal are to have a fully public available data from the ground up that helps communities, states, regions, federal government and all the stakeholders and public have useable comparative metrics and best management practices to guide proper investments in infrastructure, program enhancements or elimination.

II. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

A. Non-duplication

The information obtained under this ICR is not duplicative nor is it currently collected by EPA or any other federal agency except for the state demographic template. Here the third-party contractor simply imports the U.S. state population census data used for normalized data analytics with the reporting functions of the program. Because there is no one central source of solid waste, recycling, composting data built from the ground up, ORCR works regularly with industry, stakeholders and states to facilitate their efforts of information sharing.

B. Public Notice Required Prior to ICR Submission to OMB

In compliance with the Paperwork Reduction Act of 1995, EPA issued a public notice in the *Federal Register* on April 3, 2019 (84 FR 13040) and provided a 60-day comment period for this ICR. One comment was received from the Utility Solid Waste Activities Group. They were in support of the collection.

C. Consultations for WasteWise and Challenges

As discussed above, since the last ICR approval, EPA has implemented an online data management and reporting system for use by Partners and Endorsers in WasteWise and the Challenges. Prior to launching this new system, EPA consulted with long-standing WasteWise members to beta-test the online system. EPA staff also conducted personal interviews with specific program members to discuss the utility of the

registration forms, annual data and goal forms, and other online features. Discussions were conducted with the following WasteWise and Challenge participants:

Name	Organization	E-Mail Address
Kirby Kraft	Anheuser-Bush	kirby.kraft@anheuser-busch.com
Bruce Norton	Constellation Energy	bruce.a.norton@constellation.com
John Bradburn	General Motors	john.bradburn@gm.com
Tom Costantino	PSEG	thomas.costantino@pseg.com
Charlie Vidich	USPS	charles.vidich@usps.gov
Don Curran	Virco Mfg	doncurran@virco.com
Vicki Bushnell	Kitsap County, WA	vbushnel@co.kitsap.wa.us
Kathleen Tobin	Verizon	kathleen.tobin@verizon.com
Kinley Deller	King County, WA	kinley.deller@kingcounty.gov

The EPA also conducted webinars to allow members to test the system. Test accounts were created so members could input data and trial the system. The EPA evaluated time, functionality of the system, utility, ease of use, and maneuverability within the system. The feedback received allowed us to make key enhancements to the automated system to improve access and facilitate data entry. These tests also allowed us to identify time demands for database system use which was used to help develop the economic burden and costs discussed in Section V.: ESTIMATING THE BURDEN AND COST OF COLLECTION of this ICR. In addition, EPA headquarters consulted with EPA Regional offices to identify types of reports needed to improve participant support as well as meet EPA data needs. EPA is continuing to build the necessary capabilities within the database system to satisfy all data demands and report formats. Data points included in the database system mirror data points approved in previous ICR's. Data collection forms were converted from hard copy to electronic format.

Once EPA launched the new online system, the Agency held a series of webinars for existing and potential WasteWise and Challenge participants. EPA has taken great care to make the transition to the on-line automated system as seamless and workable as possible for our participants.

According to unsolicited feedback that we have received from both WasteWise and Challenge participants, the on-line data management and reporting system has had a positive effect on the programs. Many participants use the on-line system for internal tracking and reporting purposes and appreciate the ability to sort their data and run customized reports. Of benefit is the system's ability to allow participants to track and report data for individual reporting locations within their organization.

D. Consultations for SMP

Eight EPA Region 4 states came together for their annual States Manager's meeting. During this meeting Georgia, South Carolina, and Tennessee talked about sharing data from their shared online provider. Georgia shared this idea with the group. All eight states were interested in exploring this new concept. These states continued to discuss areas of overlap the states could share like reporting questions, data reports, and raw data. Through these discussions, the states agreed to share basic data that would aid them in program management and to streamline sharing data. The States asked and worked with EPA Region 4 to provide Quality Control on data for uniformity. This effort demonstrated that measurement was important to the states across the country and that there was a need to share data. However, all agreed the states desired to maintain control and "own" their data. These dialogues led to the development of the State Measurement Program.

Effects of Less Frequent Collection

The Registration Forms and Partnership Agreement Forms are one-time submissions for all organizations wishing to participate in WasteWise or the Challenges. The forms identify organizational users of the database system. Additional users can be added by EPA system administrators.

Within 90 days of registering, participants submit the online Baseline Data and Baseline Goals Forms. These forms report the participant's activities in waste reduction prior to joining WasteWise or the Challenges. The Baseline Goals Form provides the participants first year goals for waste reduction or endorser activities. Baseline data and goals forms are one-time submissions by all participants. Once baseline data and baseline goals are collected, participants submit annual waste reduction data and goals for the upcoming year using the Annual Data Form and Annual Goals Form. The Annual Data Form reports the waste reduction achievements of a participant for the previous calendar year. The Annual Goals Form provides targeted waste reduction goals for the new calendar year. Both the Annual Data Form and Annual Goals Form are required each year for as long as a participant remains active in the program(s).

Endorsers are also required to submit a Registration Form, Participant Agreement Form, Baseline Goals Form, Annual Data Form, and Annual Goals Form. These forms provide details of what recruitment and/or promotional activities the Endorser has/will participate in throughout the year and sets goals for future Endorser activities in the upcoming year. Endorsers are required to submit Annual Data Forms and Annual Goals Forms each year for as long as they remain active in the program(s).

EPA believes that the frequency of data collection for WasteWise and the Challenges is appropriate and mirrors existing organization's internal annual reporting. Less frequent collection of annual reports would hinder any of EPA's efforts to:

- Analyze collected data to develop timely and successful strategies for engaging with participants to achieve greater waste reductions and cost savings;
- Review participant activities to publicly recognize significant waste reduction activities; and
- Generate relevant and timely results that can be used to augment technical assistance that can be provided to all participants.

Annual data collection provides regular baselines and consistent trend lines and up to date information for all the states. Less collection would create the previous norm of little or no information available to the states until there was a crisis.

E. General Guidelines

All collection activities described within this ICR do not meet or exceed any of the provisions requiring special justification per 5 CFR 1320.5(d)(2).

F. Confidentiality

No information collected by EPA under WasteWise or the Challenges comprises confidential business information.

G. Sensitive Questions

No information collected by EPA under WasteWise or the Challenges are of a sensitive nature.

III. RESPONDENTS AND THE INFORMATION REQUESTED

A. WasteWise Respondents

WasteWise targets a broad audience, including small, medium, and large size businesses, nonprofit organizations, schools, colleges, universities, and federal, state, local, and tribal governments to enroll as Partners. Partners report quantities of waste reduced through waste prevention and recycling programs. WasteWise also enrolls organizations as Endorsers. Endorsers involved in WasteWise generally represent trade associations; membership organizations; federal, state, local, and tribal organizations; or any organization interested in promoting and recruiting others to enroll in WasteWise as participants. The types of information and data requested from WasteWise Partners and Endorsers is detailed below.

1. Information Requested from WasteWise Partners

When an organization joins WasteWise as a Partner, they register via an online Registration Form and submit a Partnership Agreement Form. Partners in WasteWise are required to provide baseline waste reduction data using the Baseline Data Form and set first year waste reduction goals using the Baseline Goals Form. By March 31 of each year, all WasteWise members must report on the waste reduction progress made in the previous calendar year using the Annual Data Forms and set waste reduction goals for the preceding year using the Annual Goals Form. Partners can add additional users to their online account by contacting an EPA system administrator. Partners can apply for annual awards through annual awards form.

- Waste Wise Partner Registration Form
- Waste Wise Participation Agreement Form
- Waste Wise Partner Baseline Data Form
- Waste Wise Partner Baseline Goals Form
- Waste Wise Partner Annual Data Form
- Waste Wise Partner Annual Goals Form
- WasteWise Partner of the Year Award Application Form

All WasteWise Partner related forms are shown in Attachment 1.

a) WasteWise Partner Registration Form

Partners complete and submit to EPA an online Registration Form that provides the basic registration and identifying information:

Data items:

- Organization name, parent organization name (if applicable), and industry sector;
- Organization contact information including address, and website;
- Names and location of participating facilities;
- Aggregate number of employees for participating facilities;
- How the member heard about WasteWise;
- Organization's primary contact's name; title; address, phone, fax and alternate number; and email address;
- Goals and activities; and
- Affiliate Networks, if any.

Respondent activities:

- Review the WasteWise materials and requirements online;
- Select a primary contact person for WasteWise;
- Create a password for access to the database system; and
- Log onto the database to activate the WasteWise account.

b) Participation Agreement Form – WasteWise

Participants submit to EPA an online Participation Agreement Form that provides the following information:

- Whether the organization is registering as a Partner or Endorser; and
- Verification that the person submitting the form is an authorized representative of the organization that is joining WasteWise.

c) Partner Baseline Data Form - WasteWise

WasteWise Partners are required to submit baseline waste reduction data one time via the online Partner Baseline Data Form within 90 days of submitting their Partnership Agreement Form. The Baseline Data Form provides quantitative data showing the Partner's waste reduction program achievements for a 12-month period prior to enrolling in WasteWise.

Data items:

- Municipal Solid Waste Disposed
 - o Weight of waste disposed via landfill and/or incineration (pounds and/or tons)
- Waste Prevention; Recycling; and Donation and Recycling
 - o Type of material; and
 - o Weight of waste prevented and/or material recycled or composted (pounds and/or tons)
- Buying or Manufacturing Recycled-Content Products – Optional
 - o Type of product purchased or manufactured;
 - o Current and previous recycled content percentages;
 - o Amount purchased or manufactured (pounds and/or tons); and
 - o Comments
- Cost Savings and/or Revenue – Optional
 - o Dates for cost savings and/or revenue;
 - o Total waste prevention revenue generated;
 - o Total recycling revenue generated;
 - o Total avoided purchasing costs due to waste prevention; and
 - o Total avoided disposal costs due to recycling and waste prevention.
- Comments- A partner may provide additional information on its waste reduction activities (e.g., external promotion of WasteWise, employee education, etc.) or comments about WasteWise.

Respondent Activities:

- Consolidate waste management data to develop a baseline of waste reduction activities;
- Log onto database and complete Baseline Data Forms; and
- Comments – Partner may provide baseline data-related comments in an open text box

EPA expects that the information needed for the Partner Baseline Data Form is kept as a common business practice by companies implementing waste reduction programs. Therefore, recordkeeping activities associated with reporting are not included in this ICR.

d) Partner Baseline Goals Form - WasteWise

WasteWise Partners are required to submit baseline goals (one time) for the first year of participation in the WasteWise via the online Partner Baseline Goals Form within 90 days of submitting their Participation Agreement Form. The Baseline Goals Form allows partners to set quantitative goals for waste diversion activities for the first year of participation in WasteWise. Baseline goals must represent at least a 5% increase in waste diversion as compared to the Partners baseline year.

Data items:

- Identify aggregate or material goal(s) for an increase in waste prevention, donation, recycling, composting and/or combined activities in tons or percentage increase over baseline year quantities; and
- Comments – Partner may provide baseline goal-related comments in an open text box

Respondent Activities:

- Log onto the database – complete and submit baseline goals form
- Respond to EPA's questions about submitted baseline goals
- Comments – Partner may provide baseline goals-related comments in an open text box

EPA expects that the information needed for the Partner Baseline Goals Form is kept as a common business practice by companies implementing waste reduction programs. Therefore, recordkeeping activities associated with reporting are not included in this ICR.

e) Partner Annual Data Form - WasteWise

After Partners have been enrolled in WasteWise for one full year, they are required to submit online Partner Annual Data Forms by March 31 of each year. These forms contain both qualitative and quantitative data for all waste reduction activity results during the previous calendar year.

Data items:

- Municipal Solid Waste Disposed - Optional
 - o Weight of waste disposed via landfill and/or incineration (pounds and/or tons)
- Waste Diversion - Waste Prevention; Donation; Recycling; and Composting
 - o Type of material; and
 - o Weight of waste prevented and/or material recycled or composted (pounds and/or tons)
- Buying or Manufacturing Recycled-Content Products – Optional

- o Type of product purchased or manufactured;
- o Current and previous recycled content percentages;
- o Amount purchased or manufactured (pounds and/or tons); and
- o Comments
- Cost Savings and/or Revenue – Optional
 - o Dates for cost savings and/or revenue;
 - o Total waste prevention revenue generated;
 - o Total recycling revenue generated;
 - o Total avoided purchasing costs due to waste prevention; and
 - o Total avoided disposal costs due to recycling and waste prevention.
- Comments
 - o A partner may provide additional information on its waste reduction activities (e.g., external promotion of WasteWise, employee education, etc.) or comments about WasteWise.

EPA expects that the data and information needed for the WasteWise Partner Annual Data Form is kept as a common business practice by companies implementing waste reduction programs. Therefore, recordkeeping activities associated with reporting are not included in this ICR.

Respondent activities:

- Conduct a waste assessment or account for annual waste reduction efforts;
- Review waste management records to assess progress during the reporting year;
- Set new self-identified waste reduction goals;
- Complete and submit the online Annual Data Form; and
- Respond to EPA’s questions about reported data

f) Partner Annual Goals Form - WasteWise

After Partners have been enrolled in WasteWise for one full year, they are required to submit online Partner Annual Goals Forms by March 31 of each year. These forms contain both qualitative and quantitative waste reduction goals for the upcoming calendar year.

Data items:

- Goals for incremental increase in tons reduced via the following activities: Waste Prevention; Donation; Recycling; Composting and Combined Activities
 - o Quantity of waste reduced per each activity; and
 - o Weight of waste reduced via each activity (tons or percentage)
- Comments
 - o A partner may provide additional information on its waste reduction goals

EPA expects that the data and information needed for the WasteWise Partner Annual Goals Form is kept as a common business practice by companies implementing waste reduction programs. Therefore, recordkeeping activities associated with reporting are not included in this ICR.

Respondent activities:

- Conduct a waste assessment or account for annual waste reduction efforts;
- Review waste management records to assess progress during the reporting year;
- Set new self-identified waste reduction goals;
- Complete and submit the online Partner Annual Goals Form; and
- Respond to EPA's questions about reported data

**g) Partner of the Year Award Application Form -
WasteWise**

Each year, Partners who have submitted their requisite annual data and annual goals can apply for a WW award in specific sectors which include: business; government; educational institutions; and non-profits. Awards are given for categories within each sector (e.g., large business; small business; etc.) Award applications are due April of each year, shortly after all annual data and annual goals are submitted.

Data items:

- Selection of award category
- Contact information of the individual submitting the application

Once EPA receives an online award application, the Agency uses the data already provided by the applicant in the database system to evaluate each applicant's incremental waste diversion rate during the reporting period. The agency ranks the applicants by incremental diversion rate as a basis for award consideration.

2. Information Requested from WasteWise Endorsers

When an organization joins WasteWise as an Endorser, they register via an online Registration Form and submit a Participation Agreement Form. Endorsers in WW are required to set first year Endorser activity goals using the Endorser First Year Goals Form and submit that form no later than 90 days after submitting their Participation Agreement Form. By March 31 of each year, all WW Endorsers must also report on the Endorser activities undertaken during the previous calendar year using the Endorser Annual Data Form and set goals for Endorser activities for the upcoming year and report those goals on an Endorser Annual Goals Form. These forms are required for enrollment and participation in WasteWise as an Endorser. Endorsers have the option to apply for an annual Endorser of the Year award based on their Endorser activities during the reporting year. To apply for an award, WW Endorsers can submit an online Endorser of the Year Award Application form and submit a narrative description of their activities, not to exceed five (5) pages in length.

The forms used by WW Endorsers are as follows:

WasteWise Registration Form

WasteWise Participation Agreement Form

WasteWise Endorser First Year Goals Form

Waste Wise Endorser Annual Data Form

WasteWise Endorser Annual Goals Form

WasteWise Endorser of the Year Award Application Form

All WasteWise Endorser related forms are shown in Attachment 1.

a) WW Endorser Registration Form

Endorsers must complete and submit an online Registration Form that provides basic information about the enrolling organization.

Data items:

- Organization name;
- Member Type;
- Name, title, address, phone number, fax number, and email address;

Respondent activities:

- Review the WW Endorser information;
- Select a primary contact person for the WW Endorser organization; and
- Complete and submit the online Endorser Registration Form.

b) WW Endorser Participation Agreement Form

WW Endorsers must complete and submit to EPA an online Participation Agreement Form that provides the following information:

- Whether the organization is registering as a Partner or Endorser; and
- Certification that the individual submitting the form is an authorized representative of the organization that is joining WW.

c) WW Endorser First Year Goals Form

WW Endorsers must establish and submit first year Endorser goals to EPA using the Endorser First Year Goals Form.

Data items:

- Promotional Activities Planned
 - Identify activities planned to promote food waste reduction and the WW;
 - Quantify number of publications to be distributed; recognition events to be held; and/or organizations you plan to help with technical assistance; and
 - Quantify number of WW presentations expected to be given.
- Promotional Results
 - Number of organizations and/or people reached with promotional efforts; and
 - New organizations joining WasteWise following promotional efforts.
- Other Activities
 - WasteWise Endorsers may provide any additional information on its recruitment and promotional activities and promotional goals for the upcoming year via an open text box.

Respondent activities:

- Identify recruitment and promotional activities for the upcoming year;
- Set new recruiting and promotional goals;
- Complete and submit the online Endorser First Year Goals Form; and
- Respond to EPA's questions about reported data

WW Endorsers can use the online data management and reporting system as the sole method to record, track, and report their endorsement activities. Therefore, no separate "recordkeeping" activities will be required. As a result, activities associated with separate recordkeeping, beyond data entry into the system, are not included in this ICR.

d) WW Endorser Annual Data Form

WW Endorsers are required to submit their online Endorser Annual Data Form by March 31 of each year reporting the results of their Endorser activities for the previous calendar year.

Data items:

- Promotional Activities Completed
 - o Identify activities completed to promote waste prevention and recycling and WW;
 - o Quantify number of publications to distributed; recognition events held; and/or number of organizations helped with technical assistance; and
 - o Quantify the number of WW presentations held.

- Promotional Results
 - o Number of organizations and/or people reached with promotional efforts; and
 - o Number of new organizations joining WW following promotional efforts.

- Other Activities
 - o WW Endorsers may provide any additional information on its recruitment and promotional activities for the year via an open text box.

WW Endorsers can use the online data management and reporting system as the sole method to record, track, and report their endorsement activities. Therefore, no separate “recordkeeping” activities will be required. As a result, activities associated with separate recordkeeping, beyond data entry into the system, are not included in this ICR.

Respondent activities:

- Review recruitment and promotional activities undertaken during the reporting year;
- Record all recruiting and promotional efforts during the calendar year;
- Complete and submit the online Endorser Annual Data Form; and
- Respond to EPA’s questions about reported data

e) WW Endorser Annual Goals Form

WW Endorsers must establish and submit annual goals for the upcoming reporting year using the Endorser Annual Goals Form.

Data items:

- Promotional Activities Planned
 - o Identify activities to be taken in the upcoming reporting year to promote waste prevention and recycling and WW;
 - o Quantify number of publications to be distributed; recognition events to be held; and/or

- o organizations you plan to help with technical assistance; and
- o Quantify number of FRC presentations expected to be given in the upcoming reporting year.
- Promotional Results
 - o Number of organizations and/or people reached with promotional efforts; and
 - o New organizations joining WW following promotional efforts.
- Other Activities
 - o WW Endorsers may provide any additional information on its recruitment activities and promotional goals for the upcoming reporting year via an open text box.

Respondent activities:

- Identify recruitment and promotional activities for the upcoming reporting year;
- Set new recruiting and promotional goals;
- Complete and submit the online Endorser Annual Goals Form; and
- Respond to EPA's questions about reported data

WW Endorsers can use the online data management and reporting system as the sole method to record, track, and report their endorsement activities. Therefore, no separate "recordkeeping" activities will be required. As a result, activities associated with separate recordkeeping, beyond data entry into the system, are not included in this ICR.

f) Endorser of the Year Award Application Form - WasteWise

Endorsers have the option to apply for an annual Endorser of the Year award based on their Endorser activities during the reporting year.

Data items:

- Organizational information (e.g., name, address, etc.)
- Contact information of the individual submitting the application
- Award category (e.g., large business, State government, non-profit, etc.)

To apply for an award, WW Endorsers must complete an online Endorser of the Year Award Application form and submit a narrative description of their activities, via email, not to exceed five (5) pages in length.

B. FRC Respondents_

1. Information Requested from Food Recovery Challenge (FRC) Respondents

Although any type of organization can enroll in the FRC, the Challenge targets organizations that historically have generated a large quantity of food wastes. Specifically, the FRC targets grocers, colleges and universities, public venues and the hospitality industry. Organizations can join the FRC as Participants or Endorsers. Participant's track and report food waste reduction activities and their results. Endorsers promote and recruit other organizations to enroll in the FRC and report the results of their endorsement activities. Endorsers generally represent trade associations; membership organizations; or any organization interested in promoting and recruiting others to enroll in the FRC as participants.

a) Information Requested from FRC Participants

When an organization joins the FRC as a Participant, they register via an online Registration Form and submit a Partnership Agreement Form. Partners in WasteWise are required to provide baseline waste reduction data using the Baseline Data Form and set first year waste reduction goals using the Baseline Goals Form. By March 31 of each year, all FRC participants must report on the waste reduction progress made in the previous calendar year using the Annual Data Form and set waste reduction goals for the following year using the Annual Goals Form. These forms are all required to be submitted by FRC Participants to remain in "active status." FRC Participants are automatically considered for "data awards" based on their incremental annual waste diversion achievements as reported in the database system. Therefore, there are no additional data collection of forms required for FRC Data Awards. FRC Participants can apply for "narrative awards" by completing and submitting an online FRC Awards Form.

All forms available to FRC Participants are listed below:

FRC Registration Form

FRC Participation Agreement Form

FRC Partner Baseline Data Form

FRC First Year Goal Form

FRC Participant Annual Data Form

FRC Participant Annual Goals Form

FRC Narrative Award Application Form

All FRC Participant forms are shown in Attachment 2.

b) FRC Participant Registration Form

Participants complete and submit to EPA an online Registration Form that provides the following information:

Data items

- Organization name, parent organization name (if applicable), and industry sector;
- Names and location of participating facilities;
- Aggregate number of employees at participating facilities;
- How the member heard about the FRC;
- Organization's primary contact's name; title; address, phone, fax and alternate number; and email address; and
- Goals and activities.

Respondent activities:

- Review the FRC materials and requirements online;
- Select a primary contact person for the FRC;
- Create a password for access to the database system; and
- Log onto database to activate FRC account.

c) FRC Participation Agreement Form

Participants submit to EPA an online Participation Agreement Form that provides the following information:

- Whether the organization is registering as a Partner or Endorser; and
- Name, address and other contact information for the organization and verification that the person submitting the form is an authorized representative of the organization that is joining the FRC.

d) FRC Participant Baseline Data Form

FRC Participants are required to submit baseline food waste reduction data one time via the online Participant Baseline Data Form within 90 days of submitting their Participation Agreement Form. The Baseline Data Form provides quantitative data showing the Participant's food waste reduction program achievements for a 12-month period prior to enrolling in the FRC. Participants have the choice to submit data for "summary activities" or "detailed activities." Summary activities represent broad categories of activities and include: food waste prevention; food donation; and food recycling. Detailed activities represent more specific actions such as: food donation for people; food donation for animals; composting mixed organics; composting food; anaerobic digestion, etc. In filling out this form, participants identify the baseline year and whether they will be reporting on summary activities or detailed activities.

Data items:

- Food Waste Prevention and Recycling – Summary Activities
 - o Summary activities taken in baseline year; and
 - o Weight of food waste diverted (pounds and/or tons) from prevention, donation and/or recycling during the baseline year.

- Food Waste Prevention and Recycling – Detailed Activities
 - Detailed activities taken in baseline year; and
 - Weight of food waste diverted (pound and/or tons) from: source reduction through purchasing, storage, handling, over-preparation and plate waste; donation to feed people/animals; food or mixed organics composting; anaerobic digestion; and/or other recycling during the baseline year
- Food Waste Disposal – Optional
 - Weight of food wastes landfilled during the baseline year (pounds and/or tons)
- Comments
 - A participant may provide additional information on its food waste diversion efforts during the baseline year.

Respondent activities:

- Conduct a waste assessment or account for annual food waste reduction efforts;
- Review waste management records to assess progress during the reporting year;
- Set new self-identified waste reduction goals;
- Complete and submit the online Baseline Data Form; and
- Respond to EPA’s questions about reported data

EPA expects that the information needed for the FRC Participant Baseline Data Form is kept as a common business practice by companies implementing food waste reduction programs. Therefore, recordkeeping activities associated with reporting are not included in this ICR.

e) FRC Participant Baseline Goals Form

FRC Participants are required to submit baseline goals (one time) for the first year of participation in the FRC via the online Participant Baseline Goals Form within 90 days of submitting their Participation Agreement Form. The Baseline Goals Form allows participants to set quantitative goals for food waste diversion activities for the first year of participation in the FRC. Baseline goals can be self-directed but must show improvement in food waste diversion over the baseline year. Goals can be set for summary activities or detailed activities.

Data items:

- Food Waste Prevention and Recycling – Summary Activities
 - Food waste diversion goals for summary activities such as food waste prevention, donation, and/or recycling (pounds and/or tons)
- Food Waste Prevention and Recycling- Detailed Activities

Food waste diversion goals (pounds and/or tons) for detailed activities such as food waste diverted from: source reduction through purchasing, storage, handling, over-preparation and plate waste; donation to feed people/animals; food or mixed organics composting; anaerobic digestion; and/or other recycling

- Comments
 - A participant may provide additional information on its food waste diversion goals

Respondent activities:

- Review food waste management records and assess activities to increase food waste diversion;
- Set new self-identified food waste reduction goals for first year of enrollment;
- Complete and submit the online Baseline Goals Form; and
- Respond to EPA’s questions about reported data

EPA expects that the information needed for the FRC Participant Baseline Goals Form is kept as a common business practice by companies implementing food waste reduction programs. Therefore, recordkeeping activities associated with reporting are not included in this ICR.

Data items:

- Identify aggregate or material goal(s) for an increase in waste prevention, donation, recycling, composting, and/or combined activities in pounds and/or tons or percentage increase over baseline year quantities; and
- Comments – Partner may provide baseline goal-related comments in an open text box

f) FRC Participant Annual Data Form

After participants have been enrolled in the FRC for one full year, they are required to submit online **Participant Annual Data Forms** by March 31 of each year. These forms contain both qualitative and quantitative data for all food waste reduction activity results during the previous calendar year. Participants have the choice to submit data for “summary activities” or “detailed activities.” Summary activities represent broad categories of activities and include: food waste prevention; food donation; and food recycling. Detailed activities represent more specific actions such as: food donation for people; food donation for animals; composting mixed organics; composting food; anaerobic digestion, etc.

Data items:

- Food Waste Prevention and Recycling – Summary Activities
 - Date range for the annual data;
 - Summary activities taken during the year for which data is being reported;
 - Weight of food waste diverted (pounds and/or tons) from prevention, donation and/or recycling during the year for which data is being reported.
- Food Waste Prevention and Recycling – Detailed Activities
 - Detailed activities taken during the year for which data is being reported and weight of

food waste diverted (pounds and/or tons) from: detailed activities such as food waste diverted from: source reduction through purchasing, storage, handling, over-preparation and plate waste; donation to feed people/animals; food or mixed organics composting; anaerobic digestion; and/or other recycling

- Food Waste Disposal – Optional
 - Weight of food wastes landfilled during the year for which data is being reported (pounds and/or tons).
- Comments
 - A participant may provide additional information on its food waste diversion efforts during the year for which data is being reported.

Respondent activities:

- Review waste management records to assess progress in waste diversion during the reporting year;
- Complete and submit the online Annual Data Form; and
- Respond to EPA's questions about reported data

EPA expects that the information needed for the FRC Participant Annual Data Form is kept as a common business practice by companies implementing food waste reduction programs. Therefore, recordkeeping activities associated with reporting are not included in this ICR.

g) FRC Participant Annual Goals Form

FRC Participants are required to submit annual goals for the upcoming reporting year by March 31 of each year. All goals are self-directed and must be submitted via the online Annual Goals Form. Goals can be set for summary activities or detailed activities.

Data items:

- Food Waste Prevention and Recycling – Summary Activities
 - Food waste diversion goals for summary activities such as food waste prevention; donation; and/or recycling (pounds and/or tons)
- Food Waste Prevention and Recycling – Detailed Activities
 - Detailed activities taken during the year for which data is being reported and weight of food waste diverted (pounds and/or tons) from detailed activities such as food waste diverted from: source reduction through purchasing, storage, handling, over-preparation and plate waste; donation to feed people/animals; food or mixed organics composting; anaerobic digestion; and/or other recycling
- Comments
 - A participant may provide additional information on its annual food waste diversion goals

Respondent activities:

- Review food waste management records and assess activities to increase food waste diversion for the upcoming calendar year;
- Set new self-identified food waste reduction goals for the following year;
- Complete and submit the online Annual Goals Form; and
- Respond to EPA’s questions about reported data

EPA expects that the information needed for the FRC Participant Annual Goals Form is kept as a common business practice by companies implementing food waste reduction programs. Therefore, recordkeeping activities associated with reporting are not included in this ICR.

h) FRC Participant Awards Form

FRC Participants may choose to apply for “Narrative Awards” which are given out annually. To apply for a narrative award, Participants complete and submit an online Participant Awards Form by April 30 of each year.

Data items:

- Choose from five (5) award categories
- Each category contains drop-down text boxes for narrative descriptions. The Participant provides a brief summary of activities undertaken in the reporting year for the award category(ies) chosen.

Respondent activities:

- Complete and submit the online FRC Awards Form; and
- Respond to EPA’s questions about narrative provided.

EPA expects that the information needed for the FRC Awards Form is kept as a common business practice by companies implementing food waste reduction programs. Therefore, recordkeeping activities associated with reporting are not included in this ICR.

2. Information Requested from FRC Endorsers

When an organization joins the FRC as an Endorser, they register via an online Registration Form and submit a Participation Agreement Form. Endorsers in the FRC are required to set first year Endorser activity goals using the Endorser First Year Goals Form and submit that form no later than 90 days after submitting their Participation Agreement Form. By March 31 of each year, all FRC Endorsers must also report on the Endorser activities undertaken during the previous calendar year using the Endorser Annual Data Form and set goals for Endorser activities for the upcoming year and report those goals on an Endorser Annual Goals Form. FRC Endorsers can choose to apply for “narrative awards” by completing and submitting an online FRC Awards Form.

All forms available to FRC Endorsers are listed below:

- FRC Registration Form
- FRC Participation Agreement Form
- FRC Endorser First Year Goal Form
- FRC Endorser Annual Data Form
- FRC Endorser Annual Goals Form
- FRC Narrative Award Application Form

All FRC Endorsers forms are shown in Attachment 2.

a) FRC Endorser Registration Form

Endorsers must complete and submit an online Registration Form that provides basic information about the enrolling organization.

Data items:

- Organization name;
- Principal contact person's name;
- Name, title, address, phone number, fax number, and email address;
- Approximate number of business members in the organization;
- List of primary business sectors represented by the organization (e.g., NAICS codes); and
- Description of proposed recruitment campaign to encourage the organization's members (e.g., local businesses) to enroll as Participants in the FRC.

Respondent activities:

- Review the FRC Endorser information;
- Identify promotional and support activities;
- Select a primary contact person for the FRC Endorser organization; and
- Complete and submit the online Endorser Registration Form.

b) FRC Endorser Participation Agreement Form

FRC Endorsers must complete and submit to EPA an online Participation Agreement Form that provides the following information:

- Whether the organization is registering as a Participant or Endorser; and
- Name, address and other contact information for the organization and verification that the person submitting the form is an authorized representative of the organization that is joining the FRC.

c) FRC Endorser First Year Goals Form

FRC Endorsers must establish and submit first year Endorser goals to EPA using the Endorser First Year Goals Form.

Data items:

- Promotional Activities Planned
 - Identify activities planned to promote food waste reduction and the FRC;
 - Quantify number of publications to be distributed; recognition events to be held; and/or organizations you plan to help with technical assistance; and
 - Quantify number of FRC presentations expected to be given.
- Promotional Results
 - Number of organizations and/or people reached with promotional efforts; and
 - New organizations joining WasteWise following promotional efforts.
- Other Activities
 - FRC Endorsers may provide any additional information on its recruitment and promotional activities and promotional goals for the upcoming year via an open text box.

Respondent activities:

- Identify recruitment and promotional activities for the upcoming year;
- Set new recruiting and promotional goals;
- Complete and submit the online Endorser First Year Goals Form; and
- Respond to EPA's questions about reported data

FRC Endorsers can use the online data management and reporting system as the sole method to record, track, and report their endorsement activities. Therefore, no separate "recordkeeping" activities will be required. As a result, activities associated with separate recordkeeping, beyond data entry into the system, are not included in this ICR.

d) FRC Endorser Annual Data Form

FRC Endorsers are required to submit their online Endorser Annual Data Form by March 31 of each year reporting the results of their Endorser activities for the previous calendar year.

Data items:

- Promotional Activities Completed
 - Identify activities completed to promote food waste reduction and the FRC;
 - Quantify number of publications to distributed; recognition events held; and/or number of organizations helped with technical assistance; and
 - Quantify the number of FRC presentation held.
- Promotional Results
 - Number of organizations and/or people reached with promotional efforts; and
 - Number of new organizations joining the FRC following promotional efforts.

- Other Activities
 - FRC Endorsers may provide any additional information on its recruitment and promotional activities for the year via an open text box.

Endorsers can use the online data management and reporting system as the sole method to record, track, and report their endorsement activities. Therefore, no separate “recordkeeping” activities will be required. As a result, activities associated with separate recordkeeping, beyond data entry into the system, are not included in this ICR.

Respondent activities:

- Review recruitment and promotional activities undertaken during the reporting year;
- Record all recruiting and promotional efforts during the calendar year;
- Complete and submit the online Endorser Annual Data Form; and
- Respond to EPA’s questions about reported data

e) FRC Endorser Annual Goals Form

FRC Endorsers must establish and submit annual goals for the upcoming reporting year using the Endorser Annual Goals Form.

Data items:

- Promotional Activities Planned
 - Identify activities to be taken in the upcoming reporting year to promote food waste reduction and the FRC;
 - Quantify number of publications to be distributed; recognition events to be held; and/or organizations you plan to help with technical assistance; and
 - Quantify number of FRC presentations expected to be given in the upcoming reporting year.

- Promotional Results
 - Number of organizations and/or people reached with promotional efforts; and
 - New organizations joining the FRC following promotional efforts.

- Other Activities
 - FRC Endorsers may provide any additional information on its recruitment activities and promotional goals for the upcoming reporting year via an open text box.

Respondent activities:

- Identify recruitment and promotional activities for the upcoming reporting year;

- Set new recruiting and promotional goals;
- Complete and submit the online Endorser Annual Goals Form; and
- Respond to EPA's questions about reported data

FRC Endorsers can use the online data management and reporting system as the sole method to record, track, and report their endorsement activities. Therefore, no separate "recordkeeping" activities will be required. As a result, activities associated with separate recordkeeping, beyond data entry into the system, are not included in this ICR.

f) FRC Endorser Awards Form

FRC Endorsers may choose to apply for a "Narrative Award" which is given out annually to Endorser. To apply for an narrative award, Endorsers complete and submit an online FRC Awards Form by April 30 of each year.

Data items:

- Choose Award category - Endorser
- Drop-down text boxes for narrative description of Endorser activities for the reporting year

Respondent activities:

- Complete and submit the online FRC Awards Form; and
- Respond to EPA's questions about narrative provided.

EPA expects that the information needed for the FRC Awards Form is kept as a common business practice by companies. Therefore, recordkeeping activities associated with reporting are not included in this ICR.

C. Electronics Challenge (EC) Respondents

1. Information Requested from Electronics Challenge (EC) Respondents

EPA's Electronics Challenge (EC) promotes responsible management of used electronics by challenging manufacturers and retailers of electronics to voluntarily commit to sending 100 percent of used electronics collected for reuse and recycling to third-party certified recyclers, increasing the total amount of used electronics collected for reuse and recycling, and publicly posting information and data. In general, participants are asked to track and report used electronic equipment collection; recycling data; use of certified recyclers; and educational/outreach efforts to promote electronics reuse and recycling. Organizations can enroll in the EC at three distinct membership tiers, which include: bronze, silver and gold. Each membership tier has varying degrees of data requirements with the bronze tier requiring the least data and the gold tier the most. The EC was designed as a progressive Challenge in which participants would be required to progress from the lower tier (Bronze) to the highest tier (Gold) in successive years.

Participation in the EC has been limited to only 11 organizations nationwide. The focus is upon improving overall resource implications by going to the organizations that make or sell a majority of the electronics equipment in the U.S. There are no concrete plans to expand this Challenge beyond the existing participants. Of the current 11 participants, nine (9) are enrolled at the Gold tier and two (2) are enrolled at the Silver tier. EPA anticipates that the EC participants that are enrolled at the Silver Tier will advance to the Gold Tier and will eventually submit data associated with the Gold Tier. Therefore, for the purposes of this ICR and for calculating respondent burden and cost of data collection, EPA presumes that all EC participants will be submitting annual data associated with the Gold Tier of enrollment. All data forms available for the Bronze, Silver and Gold enrollment tiers are shown in Appendix 27. Since all participants are already enrolled in the EC, the description detailed below includes only the annual data collected from Gold Tier enrollees since it is presumed that all EC Participants will be enrolled at the Gold Tier level for the vast majority of the time they are participating in the Electronics Challenge. In addition, this presumption reflects not only a realistic view of enrollee participation, but also a “worst case” scenario for estimating respondent burden and costs.

a) Gold Tier Enrollment

When an organization joins the Electronics Challenge (EC), they register via an online Registration Form and submit a Participation Agreement Form. Participants in the EC are required to provide baseline data on how they manage used electronics via a Baseline Data Form and report annual data using Annual Data Forms. By June 30 of each year, all EC participants must report on the results of their activities in the previous calendar year using the Annual Data Forms. Since no additional EC participants will be joining the Challenge under the time period for this ICR, no participants will need to complete or submit a Registration Form, Participation Agreement, or Baseline Data Form. For content, these forms are shown in Appendices 24-28. EPA presumes that, for the purpose of estimating cost burdens for this ICR, all 11 EC participants will be submitting Annual Data Forms for Gold Tier participation each of the three years covered by this ICR. All forms available to EC Gold Tier Participants are listed below and shown Attachment 3.

Electronics Challenge (EC) Participant Registration Form (Gold Tier)

Electronics Challenge (EC) Participant Agreement Form (Gold Tier)

Electronics Challenge (EC) Participant Baseline Data Form (Gold Tier)

Electronics Challenge (EC) Participant Annual Data Form (Gold Tier)

Electronics Challenge (EC) Electronics Challenge Award (Gold Tier)

(1) *EC Participant Annual Data Form – Gold Tier*

After Participants have been enrolled in the EC for one full year, they are required to submit online Participant Annual Data Forms by June 30 of each year. These forms contain both qualitative and

quantitative data for all used electronics recycling and reuse activity results achieved during the previous calendar year. Information and data elements contained in the Annual Data Forms are shown below.

Data items:

- Used electronics collection data (all in tons – reporting in number of electronic units is optional);
 - Total electronics collected for reuse and recycling from all streams (tons and/or units);

 - Total collected for reuse & recycling from all streams;
 - Equipment (tons and/or units);
 - Cell phones and other mobile devices (tons and/or units); and
 - Accessories (tons and/or units);
 - Sub-total;

- Reuse and Recycling Data;
 - Total tons and/or units sent to third-party certified recyclers from all streams;
 - Percentage (of total sent to third-party certified recyclers);

- State Data (tons);
 - Weight of electronics collected in two states with take-back laws explicitly to meet these laws;
 - Weight of electronics collected in two states that exceeds state tack-back laws, collected in states with take-back laws;
 - Total units collected in states with take-back laws (optional);
 - Weight of electronics collected in states without take-back laws;
 - Total units collected in states without take-back laws (optional);
 - Weight of electronics collected but not attributable to a specific state;
 - Total units collected but not attributable to a specific state (optional); and
 - Textbox to explain participant’s approach to arriving at state data or company-specific factors that contributed to collection totals.

Other reporting requirements;

- Due Diligence: Verification that participant exercises due diligence to ensure all initial and “downstream” recyclers are third-party certified (yes/no);
- Certified Recyclers and Programs;
 - Declaration that participant includes information on certified recyclers in publicly-posted reports (yes/no);
 - Textbox to list names of certified recyclers used and certification programs;
- Education & Outreach;
 - Textbox to explain public education and outreach activities to explain the safe management of used electronics and available collection opportunities;
 - Textbox to insert website address where education and outreach activities can be

- found (optional);
- o Company Policy Favoring Recycling and Reuse;
 - Textbox to list and describe company policies that favor recycling and reuse of electronic equipment and components;
- o Website; and
 - Textbox to list company website where data provided to EPA for the Electronics Challenge is publicly posted.

Respondent activities:

- Review existing records to determine collection and recycling data for used electronic equipment and accessories;
- Complete and submit the online Annual Data Form; and
- Respond to EPA's questions about reported data

EPA expects that the information and data needed for the EC participant Annual Data Form are kept as a common business practice by companies implementing electronics recycling and reuse programs. Recordkeeping activities associated with reporting are not the result of participating in the EC and therefore are not included in this ICR.

D. State Measurement Program Participants

State Measurement Program participants are primarily comprised of state agency officials. Presently there are participating contacts for all 50 states and the District of Columbia except for Wyoming and Alaska.

1. Information Requested from SMP Template

Supplementary appendices contain a PDF of the State Measurement Template of 15 questions while Attachment F provides actual screenshots of the Template to provide a complete look at the web-based system owned and operated by Emerge Knowledge and called the Re-TRAC Connect system.

2. Information Requested from Resource Module

Supplementary appendices contain a PDF of the State Resource Module for an easy to read summary of the materials requested and provides the screenshots of the Resource Module.

3. Information Requested from Feedback Form

Supplementary appendices contain a PDF of the State Feedback Form while and provides the screenshots of the Feedback Form.

4. Information Requested from Census

Each year the third-party holder of the data (Presently Emerge Knowledge's Re-TRAC Connection system) pulls the census data for each state into the system to provide analytics on a per capita and per household basis. This normalizing of the data provides opportunities to compare, contrast and develop baselines, trend lines and potential metrics of success. Some states requested flexibility to use their own numbers since there can be disagreements between the states and census regarding population numbers, so a form was created to allow for this.

IV. THE INFORMATION COLLECTED — AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

A. Agency Activities

1. Consensus and Collaboration Efforts –

Each spring, states review the previous year's results and converse on potential improvements, enhancements, clarifications to the state measurement platform, which is then submitted to EPA for review

2. Quality Assurance/Quality Control –

For SMP, EPA program managers from each region and/or headquarters review state submittals and cross check with previous submittals and existing state website information to identify any possible confusion or mistakes in the information and data provided. State participants are encouraged to note their definitions and data collection differences in their notes to facilitate better understanding of the information they share.

All information and data collected under WasteWise and the Challenges undergo quality assurance and quality control (QA/QC) by assigned database management administrators who have access to all forms and records submitted by participants. See Section III.:RESPONDENTS AND THE INFORMATION REQUESTED for details.

B. Collection Methodology and Management

For WasteWise and the Challenges, all data is collected on a third-party internet-based data management platform. All participants are provided private and secure accounts with credentials to enter and submit their data. EPA provides frequent online training and technical assistance for account maintenance. Data submitted undergoes standard QA/QC protocols for verification.

C. Small Entity Flexibility

For WasteWise and the Challenges, enrollment efforts include promoting to entities in the small business category. Training and technical assistance is offered and provided to small entities, as well as all other categories of participants. One on one consultations are not just provided but encouraged. For the SMP, is available to all states and territories no matter the size and includes peer mentoring to assist and encourage the involvement of smaller states.

D. Collection Schedule

WasteWise and FRC collect data by March 30th of each year and the EC collect data by June 30th of each year for previous year activity. For the SMP, data is collected each fall for the previous year.

V. ESTIMATING THE BURDEN AND COST OF COLLECTION

The burden and costs of data collection for WasteWise and the Challenges, in general, are associated with activities related to program enrollment and data submission (participants) and activities for maintaining the database and QA/QC of submitted data (EPA and/or its Contractors). Burden and cost

estimates for data collection for WasteWise (Section C.), the Food Recovery Challenge (FRC) (Section D.), the Electronics Challenge (EC) (Section E.) and State Measurement Program (SMP) (Section F.) are discussed separately below.

A. Burden Estimates

Burden means the total time, effort, and financial resources expended by persons to generate, maintain, retain, 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 purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions 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. Burden estimates for specific challenges are listed in their respective sections.

1. Agency Justification

2. Reasons for Change in Burden for WasteWise

Since the last clearance, EPA has made the following changes to the WasteWise program that affect information collection activities:

- Online Data Management and Reporting System: WasteWise's new online data management and reporting system reduced burden of WasteWise members and program administrators by automating tasks;
- Changes in Wage Rates: EPA changed the burden costs for private respondents to reflect the updated rates in the May 2009 Occupational Employment Statistics (OES) Survey from the Bureau of Labor Statistics, Department of Labor. EPA also changed the burden costs to state, local and federal respondents, as well as the Agency to reflect the 2015 GS rates. This only impacted burden costs; it did not impact burden hours; and
- Variation in Number of Participants: For this ICR, the Agency updated the Partner numbers to reflect current WasteWise membership trends. EPA expects that 50 new active Partners will join and report as active Partners during each year covered by this ICR. Additionally, EPA expects the WasteWise program to bring in 10 new active reporting Endorsers each year. Active members include Partners and Endorsers that register and report.

B. Cost Estimates

1. Private Sector

Table 1 describes the estimated hourly labor rates for private sector employment relevant to the activities. Each task or form associated with each of the activities requires input from Management and Technical staff. EPA used the May 2017 Occupational Employment Statistics (OES) Survey from the Bureau of Labor Statistics, Department of Labor to estimate average hourly private respondent labor ². This survey provides unloaded labor rates for job categories in various sectors. EPA believes (based on 25 years of program experience) that responses will require time from one manager and one technical

² <https://www.bls.gov/oes/>. Retrieved February 7, 2019. Associated Standard Occupation Code: 000001.

staff person. EPA utilized OES Survey labor category 11-9199 for managers (Managers, All Others) and technical staff 19-2041 (Environmental Scientists). These hourly rates were multiplied by the overhead factor rate of 1.55 (incorporating 55% overhead) to obtain the loaded labor rates for private sector respondents. Hourly rates for relevant staff and their loaded labor rates are shown in Table 1. All final rates (base plus overhead) have been rounded up to the nearest dollar. No capital or operations and management costs are incurred by respondents under this ICR.

Table 1: Hourly Labor Rates (Private Sector)

Labor Category	Industry Type	Mean Hourly Rate	Median Hourly Rate	Mean Hourly Rate Plus Overhead	Median Hourly Rate Plus Overhead
Management	Private Ownership	\$59.17	\$50.02	\$91.71	\$77.53
Management	Cross-Industry	\$57.65	\$49.32	\$89.36	\$76.45
Technical	Private Ownership	\$43.20	\$36.94	\$66.96	\$57.26
Technical	Cross-Industry	\$40.33	\$35.51	\$62.51	\$55.04

2. Public Sector

For federal, state, and local respondents, EPA used the General Schedule Salary Tables for 2017 issued by the Office of Personnel Management (OPM) to estimate hourly labor rates. EPA believes (based on program experience) that responses will require time from one manager (GS 14, Step 3) and one technical staff person (GS 11, Step 10). For federal employees, pay scales and structure vary between headquarters and regional offices. To account for this difference, a range of +/-1 pay grade (GS) was applied to the original staff designations (e.g. GS 13, Step 3 – GS 15, Step 3). Mean and median wage estimates were taken from the top end of the range for headquarters employees and the lower end was used for regional offices.

In 2017, OPM estimated 2,087,747 full-time federal employees nationally, with approximately 21% working in the Washington, DC area headquarters. It is estimated that the weighted ratio of state to local respondents is 2:3. Unloaded hourly rates were weighted to represent the ratio of headquarters to regional employees and their subsequent pay structure. The “weighted state/local” statistic represents this ratio. EPA multiplied these basic hourly rates by the standard government overhead factor of 1.55 to obtain the loaded labor rates shown in Table 2. All figures have been rounded up to the next full dollar. For estimated respondent burden and cost, median hourly wage rates were considered as to minimize influence from the high and low extremes.

Table 2: Hourly Labor Rates (Public Sector)

Labor Category	Mean Wage	Median Wage	Mean rate with overhead	Median rate with overhead
Management				
Regional Federal	\$48.45	\$48.45	\$75	\$75
Headquarters Federal	\$67.35	\$67.35	\$104	\$104
Total Federal	\$59.10	\$59.25	\$92	\$81
Weighted Federal Management	\$52.42	\$52.42	\$81	\$81
State	\$47.46	\$40.85	\$74	\$63
Local	\$46.47	\$44.62	\$72	\$69
Weighted State/Local Management	\$47.13	42.11	\$73	\$65
Technical				

Regional Federal	\$37.71	\$37.71	\$58	\$58
Headquarters Federal	\$49.66	\$49.66	\$77	\$77
Total Federal	\$36.23	\$34.16	\$56	\$53
<i>Weighted Federal Technical</i>	<i>\$40.22</i>	<i>\$40.22</i>	<i>\$62</i>	<i>\$62</i>
State	\$32.69	\$31.06	\$51	\$48
Local	\$35.29	\$33.70	\$55	\$52
<i>Weighted State/Local Technical</i>	<i>\$33.56</i>	<i>\$31.94</i>	<i>\$52</i>	<i>\$51</i>

Italicized items are used in later calculations

Each of the activities requires different forms for joining the program, as well as maintaining participation. Additionally, there is a different number of participants for each of the described programs. The subsequent sections outline the burden of the required activities in terms of hours dedicated to each task, and overall impact due to participant count.

C. Estimating Respondent Burden and Costs for WasteWise

WasteWise participants can choose to engage in the program in two ways, as Partners or Endorsers. WasteWise partners have more rigorous standards to meet to maintain membership in the program. The subsequent section presents the burden hours, costs per respondent, and total for all respondents during each of the three years covered under this ICR. WasteWise members are divided into three sectors representing: Private, State/Local, and Federal.

1. WasteWise Partners

a) Partner Registration Form

The Partner Registration Form contains basic questions, and thus the burden is expected to be minimal. The overall burden, as shown in the tables, is estimated to be **one hour** per participant. This burden level is an estimate based upon on Partners consultations and 25 years of WasteWise experience. The burden estimate for the Partner Registration Form is for completing and submitting the electronic form. This form is submitted only once.

b) Participation Agreement Form

The Participation Agreement Form contains basic information for review by each Partner, and thus the burden is expected to be minimal. The overall burden, as shown in the tables, is estimated to be **one-half hour** per participant. This burden level is an estimate based upon on Partners consultations and 25 years of WasteWise experience. The burden estimate for the Partnership Agreement Form is for completing and submitting the electronic form. This form is only submitted once.

c) Partner Baseline Data Form

Completing the Partner Baseline Data Form entails assessment, reporting, and recordkeeping activities associated with quantifiable data that represents waste management activities prior to the Partner enrolling in WasteWise. The labor burden for Partners is expected to average **40 hours** per participant; this estimate is based upon on Partners consultations and 25 years of WasteWise experience. Burden hours for the Partner Baseline Data Form are for conducting a waste assessment, collecting data, entering data into the online data management and reporting system, and reporting activities. Partners are required to submit the Partner Baseline Data Form only once after enrolling in WasteWise. This form is not completed annually.

d) Partner Baseline Goals Form

Completing the Partner Baseline Goals Form entails assessment, reporting, and recordkeeping activities associated with setting quantifiable waste reduction goals for the first year of a Partner's enrollment in WasteWise. The labor burden for Partners is expected to average **eight (8) hours** per participant; this estimate is based upon on Partners consultations and 25 years of WasteWise experience. Burden hours for the Partner Baseline Goals Data Form are for assessing plans to increase waste reduction activities, estimating quantifiable goals, and entering data into the online data management and reporting system. Partners are required to submit the Partner Baseline Goals Form only once after enrolling in WasteWise. This form is not completed annually.

e) Partner Annual Data Form

Completing the Partner Annual Data Form entails assessment, reporting, and recordkeeping activities. The overall annual labor burden for Partners is expected to average **34.5 hours** per participant; this estimate is based upon on Partners consultations and 25 years of WasteWise experience. Burden hours for the Partner Annual Data Form are for conducting a waste assessment, collecting data, and entering data into the online data management and reporting system. Partners are required to submit the Partner Annual Data Form after their first full year in WasteWise. Therefore, the burden and costs of preparing and submitting the Partner Annual Data Form are incurred annually after year 1. There are no costs associated with this form during year 1.

f) Partner Annual Data Form

Completing the Partner Annual Goals Form entails assessment and reporting activities associated with setting quantifiable waste reduction goals for the upcoming year. The labor burden for Partners is expected to average **eight (8) hours** per participant; this estimate is based on Partners consultations and 25 years of WasteWise experience. Burden hours for the Partner Annual Goals Form are for assessing plans to increase waste reduction activities, estimating quantifiable goals, and entering data into the online data management and reporting system. Partners are required to submit the Partner Annual Goals Form each year after their first full year of enrollment (i.e., starting in year 2 of their enrollment).

g) Partner of the Year Award Application

Completing the Partner of the Year Award Application entails completing and submitting an online form. This form notifies EPA to evaluate existing data in the data management system for consideration of an award in a specified category. Award applicants are estimated to spend a total of **0.5 hours** to review, complete and submit the form. Since the number of applicants and award categories vary from year to year (different sectors, public and private), based on previous average of applicants in the past three years, EPA assumes 35 applicants will apply each year.

Table 3: Burden and Cost to Partners

	Time Burden			Cost Per Activity Across Sectors		
	Management	Technical	Total Hours	Private Sector Participants: Management (\$92/hr) Technical (\$67/hr)	State/Local Participants: Management (\$73/hr) Technical (\$52/hr)	Federal Participants: Management (\$81/hr) Technical (\$62/hr)
Registration Form						
Review Form	0.25	0.5	0.75	\$56.50	\$44.25	\$51.25
Complete/Transmit Form	0	0.25	0.25	\$16.75	\$13.00	\$15.50
<i>Subtotal</i>	0.25	0.75	1	\$73.25	\$57.25	\$66.75
Participation Agreement Form						
Complete/Transmit Form	0.25	0.25	0.5	\$39.75	\$31.25	\$35.75
<i>Subtotal</i>	0.25	0.25	0.5	\$39.75	\$31.25	\$35.75
Baseline Goals Form						
Establish targets and methodology to meet goals	2	5	7	\$519.00	\$406.00	\$472.00
Complete/Transmit Form	0.25	0.75	1	\$73.25	\$57.25	\$66.75
<i>Subtotal</i>	2.25	5.75	8	\$592.25	\$463.25	\$538.75
Baseline Data Form						
Collect records and conduct a waste assessment OR account for annual efforts	9	19	28	\$2,101.00	\$1,645.00	\$1,907.00
Set goals	2.5	7.5	10	\$732.50	\$572.50	\$667.50
Complete/Transmit Form	0.25	1.75	2	\$140.25	\$109.25	\$128.75
<i>Subtotal</i>	11.75	28.25	40	\$2,973.75	\$2,326.75	\$2,703.25
Annual Data Form						
Collect records and conduct a waste assessment OR account for annual efforts	7	14	21	\$1,582.00	\$1,239.00	\$1,435.00
Assess progress	0.25	0.25	0.5	\$39.75	\$31.25	\$35.75
Set Goals	2.5	7.5	10	\$732.50	\$572.50	\$667.50
Complete/Transmit Form	0.25	1.75	2	\$140.25	\$109.25	\$128.75
Respond to EPA Questions	0.25	0.75	1	\$73.25	\$57.25	\$66.75
<i>Subtotal</i>	10.25	24.25	34.5	\$2,567.75	\$2,009.25	\$2,333.75
Annual Goals Form						
Establish targets and methodology to meet annual goals	2	4	6	\$452.00	\$354.00	\$410.00
Complete/Transmit Form	0.25	1.75	2	\$140.25	\$109.25	\$128.75
<i>Subtotal</i>	2.25	5.75	8	\$592.25	\$463.25	\$538.75
<i>Total Cost to All Partners</i>	27	65	92	\$6,839.00	\$5,351.00	\$6,217.00

In the first year of membership, new Partners are estimated to spend a **total of 49.5 hours** (one hour on the Partner Registration Form; 0.5 hours on the Participation Agreement Form; 8 hours on Partner

Baseline Goals Form and 40 hours on the Partner Baseline Data Form). It is estimated that Partners spend 42.5 hours (34.5 hours on the Partner Annual Data Form and 8 hours on the Partner Annual Goals Form) for each subsequent year of enrollment in WasteWise. It is also estimated that each year 35 applicants will spend 0.5 hours submitting Partner of the Year Award Application forms.

2. WasteWise Endorsers

a) Endorser Registration Form

The Endorser Registration Form contains basic questions, and thus the burden is expected to be minimal. The overall burden, as shown in the tables, is estimated to be **one (1) hour** per participant. This burden level is an estimate based upon on Partners consultations and 25 years of WasteWise experience. The burden estimate for the Endorser Registration Form is for completing and submitting the electronic form. This form is only submitted once.

b) Endorser Agreement Form

The Endorser Agreement Form contains basic information for review by each Endorser, and thus the burden is expected to be minimal. The overall burden, as shown in the tables, is estimated to be **one-half hour** per participant. This burden level is an estimate based upon on Partners consultations and 25 years of WasteWise experience. The burden estimate for the Endorser Agreement Form is for completing and submitting the electronic form.

c) Endorser First Year Goals Form

Completing the Endorser First Year Goals Form entails assessment and reporting activities associated with setting goals for specific activities that promote WasteWise during the Endorser's first year of enrollment. The labor burden for Endorsers is expected to average **one (1) hour** per participant; this estimate is based upon on Partners consultations and 25 years of WasteWise experience. Burden hours for the Endorser First Year Goals Form are for assessing organizational plans to promote WasteWise through various media, quantifying actions, and entering data into the online data management and reporting system. Endorsers are required to submit the Endorser First Year Goals Form only once after enrolling in WasteWise. This form is submitted only during year one of enrollment.

d) Endorser Annual Data Form

Completing the Endorser Annual Data Form entails assessment and reporting activities. The overall annual labor burden for Endorsers is expected to average **two (2) hours** per participant. Burden hours for the Endorser Annual Data Forms are for documenting annual Endorser activities, assessing progress and entering data into the online data management and reporting system.

e) Endorser Annual Goals Form

Completing the Endorser Annual Goals Form entails assessment of activities the Endorser plans to achieve in the upcoming year. The labor burden for Endorsers is expected to average **eight (8) hours** per participant; this estimate is based upon on Endorser consultations and 25 years of WasteWise experience. Burden hours for the Endorser Annual Goals Form are for assessing organizational plans to promote WasteWise through various media, quantifying actions, and entering data into the online data management and reporting system. Endorsers are required to submit the Endorser Annual Goals Form each year after their first full year of enrollment (i.e., starting in year 2 of their enrollment).

f) Endorser of the Year Award Application

Endorsers can submit an Endorser of the Year Award Application which entails completing and submitting an online form. In addition, Endorsers must also submit a narrative of no longer than five pages in length explaining their Endorser activities for the reporting year. Historically, EPA receives few, if any, Endorser of the Year Award applications therefore the purposes of this ICR, EPA has not included any costs or burden for the Endorser of the Year Award Applications.

Table 4: Burden and Cost for Endorsers

	Time Burden			Cost Per Activity Across Sectors		
	Management	Technical	Total Hours	Private Sector Participants: Management (\$92/hr) Technical (\$67/hr)	State/Local Participants: Management (\$73/hr) Technical (\$52/hr)	Federal Participants: Management (\$81/hr) Technical (\$62/hr)
Registration Form						
Review Form	0.25	0.5	0.75	\$56.50	\$44.25	\$51.25
Complete/Transmit Form	0	0.25	0.25	\$16.75	\$13.00	\$15.50
Subtotal	0.25	0.75	1	\$73.25	\$57.25	\$66.75
Participation Agreement Form						
Complete/Transmit Form	0.25	0.25	0.5	\$39.75	\$31.25	\$35.75
Subtotal	0.25	0.25	0.5	\$39.75	\$31.25	\$35.75
First Year Goal Form						
Complete/Transmit Form	0.25	0.75	1	\$73.25	\$57.25	\$66.75
Subtotal	0.25	0.75	1	\$73.25	\$57.25	\$66.75
Annual Data Form						
Assess progress	0.25	0.75	1	\$73.25	\$57.25	\$66.75
Complete/Transmit Form	0.25	0.75	1	\$73.25	\$57.25	\$66.75
Subtotal	0.5	1.5	2	\$146.50	\$114.50	\$133.50
Annual Goals Form						
Set Goals	0.25	0.5	0.75	\$56.50	\$44.25	\$51.25
Complete/Transmit Form	0	0.25	0.25	\$16.75	\$13.00	\$15.50
Subtotal	0.25	0.75	1	\$73.25	\$57.25	\$66.75
Total Cost to All Endorsers	1.5	4	5.5	\$406.00	\$317.50	\$369.50

3. Estimating Respondent Costs for WasteWise

As of October 1, 2018, WasteWise had an enrollment of 880 active Partners and 425 active Endorsers. WasteWise anticipates receiving 100 new Partner Registration Forms and 50 new Endorser Registration Forms each year under this ICR. Of these new registrants, WasteWise anticipates 50 Partners and 10 Endorsers will fulfill their membership requirements and submit Annual Data Forms and Annual Goal Forms each year. In addition, 50 partners will submit the Partner of the Year Award Application each year. For the purposes of the ICR, it is assumed that the costs for these partners reflect private sector

rates as a worst-case scenario. As previously mentioned, no Endorser award applications are included in these estimates.

Table 5: WasteWise Membership

WasteWise Partners (by category)				
	Federal	State/Local	Private	Total
Current	26	128	726	880
Year 1	29	134	767	930
Year 2	32	140	808	980
Year 3	35	146	849	1030
WasteWise Endorsers (by category)				
	Federal	State/Local	Private	Total
Current	2	16	407	425
Year 1	1	17	417	435
Year 2	1	19	425	445
Year 3	1	21	433	455

Table 6: Estimated WasteWise Partner Burden and Cost

	Cost per member		Year 1		Year 2		Year 3	
	Year 1	Year 1+	Participants	Yearly cost	Participants	Yearly cost	Participants	Yearly cost
Registration Form								
Private	\$73.25	\$0.00	767	\$56,182.75	808	\$0.00	849	\$0.00
State/Local	\$57.25	\$0.00	134	\$7,671.50	140	\$0.00	146	\$0.00
Federal	\$66.75	\$0.00	29	\$1,935.75	32	\$0.00	35	\$0.00
Participation Agreement Form								
Private	\$39.75	\$0.00	767	\$30,488.25	808	\$0.00	849	\$0.00
State/Local	\$31.25	\$0.00	134	\$4,187.50	140	\$0.00	146	\$0.00
Federal	\$35.75	\$0.00	29	\$1,036.75	32	\$0.00	35	\$0.00
Baseline Goals Form								
Private	\$592.25	\$0.00	767	\$454,255.75	808	\$0.00	849	\$0.00
State/Local	\$463.25	\$0.00	134	\$62,075.50	140	\$0.00	146	\$0.00
Federal	\$538.75	\$0.00	29	\$15,623.75	32	\$0.00	35	\$0.00
Baseline Data Forms								
Private	\$2,973.75	\$0.00	767	\$2,280,866.25	808	\$0.00	849	\$0.00
State/Local	\$2,326.75	\$0.00	134	\$311,784.50	140	\$0.00	146	\$0.00
Federal	\$2,703.25	\$0.00	29	\$78,394.25	32	\$0.00	35	\$0.00
Annual Data Form								
Private	\$0.00	\$2,567.75	767	\$0.00	808	\$2,074,742.00	849	\$2,180,019.75
State/Local	\$0.00	\$2,009.25	134	\$0.00	140	\$281,295.00	146	\$293,350.50
Federal	\$0.00	\$2,333.75	29	\$0.00	32	\$74,680.00	35	\$81,681.25
Annual Goals Form								
Private	\$0.00	\$592.25	767	\$0.00	808	\$478,538.00	849	\$502,820.25
State/Local	\$0.00	\$463.25	134	\$0.00	140	\$64,855.00	146	\$67,634.50
Federal	\$0.00	\$538.75	29	\$0.00	32	\$17,240.00	35	\$18,856.25
Participant Totals			930	\$3,304,502.50	980	\$2,991,350.00	1030	\$3,144,362.50

Table 7: Estimated WasteWise Endorser Burden and Cost

	Cost per member		Year 1		Year 2		Year 3	
	Year 1	Year 1+	Participants	Yearly cost	Participants	Yearly cost	Participants	Yearly cost
Registration Form								
Private	\$73.25	\$0.00	417	\$30,545.25	425	\$0.00	433	\$0.00
State/Local	\$57.25	\$0.00	17	\$973.25	19	\$0.00	21	\$0.00
Federal	\$66.75	\$0.00	1	\$66.75	1	\$0.00	1	\$0.00
Participation Agreement Form								
Private	\$39.75	\$0.00	417	\$16,575.75	425	\$0.00	433	\$0.00
State/Local	\$31.25	\$0.00	17	\$531.25	19	\$0.00	21	\$0.00
Federal	\$35.75	\$0.00	1	\$35.75	1	\$0.00	1	\$0.00
First Year Goals Form								
Private	\$73.25	\$0.00	417	\$30,545.25	425	\$0.00	433	\$0.00
State/Local	\$57.25	\$0.00	17	\$973.25	19	\$0.00	21	\$0.00
Federal	\$66.75	\$0.00	1	\$66.75	1	\$0.00	1	\$0.00
Annual Data Form								
Private	\$0.00	\$146.50	417	\$0.00	425	\$62,262.50	433	\$63,434.50
State/Local	\$0.00	\$114.50	17	\$0.00	19	\$2,175.50	21	\$2,404.50
Federal	\$0.00	\$133.50	1	\$0.00	1	\$133.50	1	\$133.50
Annual Goals Form								
Private	\$0.00	\$73.25	417	\$0.00	425	\$31,131.25	433	\$31,717.25
State/Local	\$0.00	\$57.25	17	\$0.00	19	\$1,087.75	21	\$1,202.25
Federal	\$0.00	\$66.75	1	\$0.00	1	\$66.75	1	\$66.75
Endorser Totals			435	\$80,313.25	445	\$96,857.25	455	\$98,958.75
Partner Total (Table 6)			930	\$3,304,502.50	980	\$2,991,350.00	1030	\$3,144,362.50
WasteWise Total			1365	\$3,384,815.75	1425	\$3,088,207.25	1485	\$3,243,321.25

D. Estimating Respondent Burden and Costs for the Food Recovery Challenge (FRC)

As of October 1, 2018, the Food Recovery Challenge (FRC) had an active enrollment of 593 Participants and 54 Endorsers. FRC anticipates receiving 100 new Participant Registration Forms and 35 new Endorser Registration Forms each year under this ICR. Each registrant will also be submitting a Participation Agreement Form. Of these new registrants, EPA anticipates 40 Participants and 5 Endorsers will fulfill their membership requirements and submit Annual Data and Annual Goal Forms each year.

Table 8: FRC Partners and Endorsers

	Current	Year 1	Year 2	Year 3
Partners	593	633	673	713
Endorsers	54	59	64	69

1. Estimating Respondent Costs for the FRC

FRC membership has almost exclusively been made up of private sector participants and endorsers. Less than 10 members have been from the public sector (i.e., Federal/State/local government). Based on this fact, EPA has used private sector rates in performing respondent burden and cost estimates for the FRC. In addition, since the FRC uses a similar database platform as WasteWise and the online forms are similar in length, detail and accessibility, EPA has used the same private sector labor categories, rates and level of effort hours to review and fill out forms as shown in the WasteWise discussion in [Section C. Estimating Respondent Burden and Costs for WasteWise](#), above.

Table 9: Estimated FRC Cost and Burden

	Cost per member		Year 1		Year 2		Year 3	
	Year 1	Year 1+	Participants	Yearly cost	Participants	Yearly cost	Participants	Yearly cost
Partners								
Registration Form	\$73.25	\$0.00	633	\$46,367.25	673	\$0.00	713	\$0.00
Participation Agreement Form	\$39.75	\$0.00	633	\$25,161.75	673	\$0.00	713	\$0.00
Baseline Goals Form	\$592.25	\$0.00	633	\$374,894.25	673	\$0.00	713	\$0.00
Baseline Data Forms	\$2,973.75	\$0.00	633	\$1,882,383.75	673	\$0.00	713	\$0.00
Annual Data Form	\$0.00	\$2,567.75	633	\$0.00	673	\$1,728,095.75	713	\$1,830,805.75
Annual Goals Form	\$0.00	\$592.25	633	\$0.00	673	\$398,584.25	713	\$422,274.25
Participant Totals			633	\$2,328,807.00	673	\$2,126,680.00	713	\$2,253,080.00

Endorsers								
Registration Form	\$57.75	\$0.00	59	\$3,407.25	64	\$0.00	69	\$0.00
Participation Agreement Form	\$33.25	\$0.00	59	\$1,961.75	64	\$0.00	69	\$0.00
First Year Goals Form	\$57.75	\$0.00	59	\$3,407.25	64	\$0.00	69	\$0.00
Annual Data Form	\$115.50	\$115.50	59	\$6,814.50	64	\$7,392.00	69	\$7,969.50
Annual Goals Form	\$57.75	\$57.75	59	\$3,407.25	64	\$3,696.00	69	\$3,984.75
Endorser Totals			59	\$18,998.00	64	\$11,088.00	69	\$11,954.25
FRC Total			692	\$2,347,805.00	737	\$2,137,768.00	782	\$2,265,034.25

2. Reasons for Change in Burden for the FRC

Since the last clearance, EPA has made the following changes to the Food Recovery Challenge (FRC) program that affect information collection activities:

- **Changes in Wage Rates:** EPA changed the burden costs for private respondents to reflect the updated rates in the May 2009 Occupational Employment Statistics (OES) Survey from the Bureau of Labor Statistics, Department of Labor. EPA also changed the burden costs to state, local and federal respondents, as well as the Agency to reflect the 2015 GS rates. This only impacted burden costs; it did not impact burden hours; and
- **Variation in Number of Participants and Endorsers:** For this ICR, the Agency updated the Partner numbers to reflect current FRC membership trends. EPA expects that 54 new Participants will join and report as active Participants during each year covered by this ICR. Additionally, EPA expects the FRC program to bring in 5 new active reporting Endorsers each year. Active members include Participants and Endorsers that register and report each year.

Under the previous ICR, the projected FRC participation rate was lower than currently experienced.

E. Estimating Respondent Burden and Costs for the Electronics Challenge (EC)

Participation in the EC has been limited to only 11 organizations nationwide and for the purposes of this ICR all have registered for the Gold Tier and will be submitting only annual data forms during the period covered by this ICR.

1. Estimating Respondent Costs for the EC

EC Partners are required to complete and submit an annual data form and respond to any EPA inquiries regarding their submittals. This work entails reviewing existing company records to determine collection and recycling data for used electronic equipment and accessories and inputting the data.

EPA expects that the information and data needed for the EC participant Annual Data Form are kept as a common business practice by companies implementing electronics recycling and reuse programs. Recordkeeping activities associated with reporting are not the result of participating in the EC and therefore are not included in this ICR.

EPA estimates that the time necessary to provide annual data is 11 hours. This includes 10 hours to complete and submit EC annual data forms and one hour to address EPA inquiries and comments.

Table 10: Burden and Cost for EC Partners

	Management	Technical	Total Hours	Cost per Activity *
Annual Data Form	0.0	8.0	8.0	\$536
Complete/Transmit Form	0.5	1.5	2.0	\$147
Respond to EPA Questions	0.5	0.5	1.0	\$80
Total	1.0	10.0	11.0	\$762

*From Table 1: Hourly Labor Rates (Private Sector) , \$92/hr Management, \$67/hr Technical

EPA estimates that each year of the EC will have the same number of participants, routinely completing the same annual form. Estimates of these activities appear in Table 11.

Table 11: Estimated Burden and Cost for the Electronics Challenge

	Cost per member	Year 1		Year 2		Year 3	
	Year 1+	Participants	Yearly cost	Participants	Yearly cost	Participants	Yearly cost
Annual Data Form	\$536	11	\$5,896	11	\$5,896	11	\$5,896
Complete/Transmit Form	\$147	11	\$1,612	11	\$1,612	11	\$1,612
Respond to EPA Questions	\$80	11	\$875	11	\$875	11	\$875
Participant Totals	\$762	11	\$8,382	11	\$8,382	11	\$8,382

2. Reasons for Change in Burden for Electronics Challenge (EC)

Since the last clearance, EPA has made the following changes to the Electronics Challenge.

- The Electronics Challenge (EC) was in its formative stages as discussed in the last ICR.
- EC data collection using an online data management and reporting system allows Partners to provide data more efficiently through automating tasks through a web based electronic platform;
- Data points requested have been more clearly defined and articulated in the Electronics Challenge. For this ICR, the Agency updated the Partner numbers to reflect current EC membership trends. EPA expects that the current level of participation (11 Partners) will remain the number of respondents during each year covered by this ICR.

F. Estimating Burden and Costs for the State Measurement Program

Participating states already collect data under their own legislative and administrative authorities. The burden cost assessed here is the time needed to pool state information from multiple sources and inputting the data into the web-based data management system. The subsequent sections present the estimated burden hours, Census Salary data, costs per state, and total for all respondents.

Actual costs presented by several states. All states were estimated by using the US Census State Government Employment and Payroll Survey March 2016 and assessed the average per hour cost for a Full Time Equivalent (FTE) Natural Resource Government Employee multiplying the hourly rate (including overhead benefits estimated at 55%) times estimated hours to provide the information to determine State Participants costs.

Like the other challenges, the SMP requires data base hosting, maintenance, QA/QC and associated efforts. GSA Schedule Contract Number GS-35F-0589V shows an annual base level of \$80,000 for a subscription service for a national state data management system. Requests for additional information or changes to the template and the resource average \$20,000 to \$70,000 per year. There are no Capital/Start-Up Annualizing Capital Costs associated with the State Measurement Program.

1. Estimating Burden Hours of the State Measurement Program

The program potentially involves the 50 states and the District of Columbia. Initial respondents reported twelve hours total to needed complete all forms. Detailed responses can be found in Appendix I. Table 12 provides the estimated hours to complete data logging. Time to review the instructions and the questions are estimated to be **one hour** per respondent.

Descriptions of each form from the State Measurement Program can be found in Section D. State Measurement Program Participants.

a) State Measurement Program Annual Template

The reporting burden for information collection requirements associated with completing the State Measurement Program Annual Template are estimated to be **two to eight hours** per respondent. The burden estimate includes time to review SMP program information and requirements and to complete and submit the form(s) online.

b) State Measurement Program Resource Module

The reporting burden for information collection requirements associated with updating the State Measurement Program Resource Module are estimated to be **one to four hours** per respondent. The burden estimate includes time to review SMP program information, requirements, and to complete and submit the form(s).

c) State Demographic Template

The reporting burden for information collection requirements associated with completing the State Demographic Template is less than **ten minutes**. The demographic information is automatically updated by US Census data every year; however, states wanted the flexibility to put in their own population estimates between the decennial US population census. Based on activities over the past three years, none have made changes.

d) State Feedback Form

The reporting burden for information collection requirements associated with completing the State Feedback Form is one to two hours per respondent.

Total estimated average time per respondent is 6.15 to 14.15 hours, with a range of 0 to 32 hours reported. California was the outlier reporting 32 hours. Burden costs are estimated to be at the higher average number of **14 hours**.

2. Estimating Respondent Costs of the State Measurement Program

Table 12: Estimated hours to complete SMP

	Management	Technical	Total Hours	Cost per Activity *
Review Forms and Instructions	0.0	1.0	1.0	48.00
Annual Template				
Review Forms and Instructions	0.25	0.5	0.75	\$39.75
Collect Data/ Complete/Transmit Form	0.00	7.00	7.00	\$336.00
<i>Subtotal</i>	0.25	7.50	7.75	\$375.75
Resource Module				
Review Forms and Instructions	0.25	0.5	0.75	\$39.75
Collect Data/ Complete/Transmit Form	0.50	2.75	3.25	\$163.50
<i>Subtotal</i>	0.75	3.25	4.00	\$203.25
State Demographic Template				
Review Forms and Instructions	0.05	0.1	0.10	\$5.55
Collect Data/ Complete/Transmit Form	0.00	0.05	0.05	\$2.40
<i>Subtotal</i>	0.05	0.10	0.15	\$7.95
State Feedback Form				
Review Forms and Instructions	0.25	0.7	0.95	\$49.35
Collect Data/ Complete/Transmit Form	0.00	0.05	0.05	\$2.40
<i>Subtotal</i>	0.25	0.75	1.00	\$51.75
<i>SMP Task Total</i>	1.30	12.60	13.90	\$686.70
<i>37 Participants in SMP</i>				\$25,407.90

* From Table 2: Hourly Labor Rates (Public Sector), \$63/hr Management, \$48/hr Technical)

3. Reasons for Change in Burden for State Measurement

State measurement represents a challenge under WasteWise that had not been specifically identified in the previous ICR.

G. Estimating Agency Burden and Costs for WasteWise and related Challenges

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 numbers 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 ICR under Docket ID No. EPA-HQ-RCRA-2010-0832, which is available for online viewing at www.regulations.gov, or in person viewing at the RCRA Docket in EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW,

Washington, DC. EPA/DC Public Reading Room is open from 8 a.m. to 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 RCRA Docket is (202) 566-0270.

Use www.regulations.gov to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. Once in the system, select “search,” then key in the docket ID number identified in this document.

Some burden and costs for these challenges falls to the federal headquarters and direct contractors. Table 13 and Table 14 present the estimated Agency burden hours and costs associated with the information collection activities under this ICR. Other direct costs (copying, printing, telephone, and mailing expenses) are also included. EPA based its burden estimates on 25 years of experience managing the WasteWise program and interacting with partners. The level of detail in the table represents key activities that support the program. Since a clear majority of the costs and burden are associated with database system itself, no effort has been made to differentiate between the various program forms and any individual costs associated with those forms.

WasteWise and the Challenges require data base hosting, maintenance, QA/QC and associated efforts. GSA Schedule Contract Number GS-35F-0589V shows an annual base level of \$84,000 for a subscription service for a data management and reporting system, as well as system maintenance. There are no Capital/Start-Up Annualizing Capital Costs associated with WasteWise and the Challenges.

1. Estimating Agency Burden and Costs for the Challenges

Costs shown below focus on the data base hosting, monthly maintenance fee for all forms in the database system, QA/QC of data submitted by participants, EPA and contractor efforts to support the program through inquiries to clarify data submittals.

EPA still expects to have contractor support for various activities associated with the information collection under this ICR and has included contractor costs in the estimates. Contractor hourly rates are estimated based on the rates for the current contractor are \$169.80 for managerial staff (Project Manager) and \$91.44 for technical staff (Program Analyst 2) so the average hourly rates are proportional to the percentage of contractor support on a given task.

Table 13: EPA and Contractor Proportional Cost

EPA/ Contractor Share	Management Rate	Technical Rate	Management %	Technical %	Average Rate
100% EPA	\$81	\$62	25%	75%	\$67
0% Contractor	\$0	\$0	0%	0%	\$0
<i>Total</i>					\$67
25% EPA	\$20	\$16	25%	75%	\$17
75% Contractor	\$127	\$69	25%	75%	\$83
<i>Total</i>					\$100
0% EPA	\$0	\$0	0%	0%	\$0
100% Contractor	\$170	\$91	25%	75%	\$111
<i>Total</i>					\$111

For federal, state, and local respondents, EPA used the General Schedule Salary Tables for 2017 issued by the Office of Personnel Management (OPM) to estimate hourly labor rates as described in Section
Error: Reference source not found

Error: Reference source not found. All figures have been rounded up to the next full dollar. For estimated respondent burden and cost, median hourly wage rates were considered as to minimize influence from the high and low extremes.

For ease of presentation, the burden and costs presented the tables are consolidated for agency efforts and a final total burden table is provided below. To accomplish this, the administrative costs associated with all the programs and all work related to database platforms have been consolidated. All similar forms used for the different challenges and initiatives have been combined and displayed in the table. As an example, the line item for registration and participation agreements includes those specific forms for all programs and data base platforms. The costs below represent the agency administrative costs for maintaining and operating the programs; including cost associated with database hosting, regular storage and maintenance of the forms and related data, contractor support for technical assistance to the participants.

Table 14: Agency Costs and Burden

	Avg. Hourly Rate	Year 1				Year 2				Year 3			
		Labor		Other Direct Costs	Total Costs	Labor		Other Direct Costs	Total Costs	Labor		Other Direct Costs	Total Costs
		Hours	Costs			Hours	Costs			Hours	Costs		
Partner Registration Form													
Maintain Online Form and Database	\$111	0	\$0	\$10,000	\$10,000	0	\$0	\$11,000	\$11,000	0	\$0	\$12,000	\$12,000
Answer Questions	\$111	350	\$38,850	\$1,400	\$40,250	350	\$38,850	\$1,400	\$40,250	350	\$38,850	\$1,400	\$40,250
Subtotal		350	\$38,850	\$11,400	\$50,250	350	\$38,850	\$12,400	\$51,250	350	\$38,850	\$13,400	\$52,250
Partner Annual Assessment Form													
Maintain Online Form and Database	\$111	0	\$0	\$10,000	\$10,000	0	\$0	\$11,000	\$11,000	0	\$0	\$12,000	\$12,000
Answer Questions	\$111	1,300	\$144,300	\$5,200	\$149,500	1,450	\$160,950	\$5,800	\$166,750	1,600	\$177,600	\$6,400	\$184,000
QA/QC Data	\$67	1,300	\$124,800	\$5,200	\$130,000	1,450	\$97,150	\$5,800	\$102,950	1,600	\$107,200	\$6,400	\$113,600
Subtotal		2,600	\$269,100	\$20,400	\$289,500	2,900	\$258,100	\$22,600	\$280,700	3,200	\$284,800	\$24,800	\$309,600
Endorser Registration Form													
Maintain Online Form and Database	\$111	0	\$0	\$10,000	\$10,000	0	\$0	\$11,000	\$11,000	0	\$0	\$12,000	\$12,000
Answer Questions	\$111	50	\$5,550	\$200	\$5,750	50	\$5,550	\$200	\$5,750	50	\$5,550	\$200	\$5,750
Subtotal		50	\$5,550	\$10,200	\$15,750	50	\$5,550	\$11,200	\$16,750	50	\$5,550	\$12,200	\$17,750
Endorser Annual Assessment Form													
Maintain Online Form and Database	\$111	0	\$0	\$10,000	\$10,000	0	\$0	\$11,000	\$11,000	0	\$0	\$12,000	\$12,000
Answer Questions	\$111	200	\$22,200	\$800	\$23,000	225	\$24,975	\$900	\$25,875	250	\$27,750	\$1,000	\$28,750
QA/QC Data	\$67	200	\$13,400	\$800	\$14,200	225	\$15,075	\$900	\$15,975	250	\$16,750	\$1,000	\$17,750
Subtotal		400	\$35,600	\$11,600	\$47,200	450	\$40,050	\$12,800	\$52,850	500	\$44,500	\$14,000	\$58,500
Cost to EPA													
Total Cost		3,400	\$349,100	\$53,600	\$402,700	3,750	\$342,550	\$59,000	\$401,550	4,100	\$373,700	\$64,400	\$438,100

2. Estimating Agency Burden and Costs for State Measurement Program

The State Measurement Program team is comprised of regional and headquarters staff with some manager level participation. Headquarters has one staff member (.5 FTE) along with some administrative and managerial support. The measurement team is a working group of **two staff level** co-leads (headquarters staff and Region 4), several management co-leads (**one each from headquarters, Region 4 and Region 5**) and at least **one staff person** for each of EPA ten regions. Since activities surrounding the SMP require regular commitment from EPA staff, the burden is estimated to be a percentage of FTE. The average participation was approximately 2.5%. Several provided actual time and expense, described in Appendix 1. GS Pay levels were derived from the OPM GS Pay Scales for 2018. The program potentially could involve all 50 states and the District of Columbia.

EPA believes (based on program experience) that responses will require time from one manager (GS 14, Step 3) and one technical staff person (GS 11, Step 10).

Table 15: Estimated Agency Cost of the SMP

Region	Management Salary*	Technical Salary*	Management Count	Technical Count	Average Cost at 2.5% of FTE
1		\$ 80,041.00	0	1	\$ 2,001.03
2		\$ 82,960.00	0	1	\$ 2,074.00
3		\$ 78,226.00	0	1	\$ 1,955.65
4	\$ 97,740.00	\$ 76,073.00	1	1	\$ 4,345.33
5	\$ 102,830.00	\$ 80,035.00	1	1	\$ 4,571.63
6		\$ 77,479.00	0	1	\$ 1,936.98
7		\$ 73,128.00	0	1	\$ 1,828.20
8		\$ 78,779.00	0	1	\$ 1,969.48
9		\$ 87,450.00	0	1	\$ 2,186.25
10		\$ 78,553.00	0	1	\$ 1,963.83
HQ	\$ 143,774.00	\$ 106,012.00	1	2	\$ 8,894.95
Total					\$33,727.30

*Regional: Management (GS 13, Step 3) and Technical (GS 10, Step 10); Headquarters: (GS 15, Step 3) and Technical (GS 12, Step 10)

H. Estimating Respondent Universe and Total Burden and Costs for Waste Wise and related challenges

Adding the subsequent estimates from WasteWise, the Food Recovery Challenge, Electronics Challenge, and the State Measurement Program with the agency costs provides the estimated universal burden and costs for all challenges and initiatives. Burden estimates across the challenges vary in methodologies, so only costs are illustrated below.

Table 16: Total Burden Hours of WasteWise, Challenges and SMP

	Year 1	Year 2	Year 3	Average
WasteWise	87,953	92,608	97,263	92,608
Food Recovery Challenge	58,561	62,268	65,976	62,268
Electronics Challenge	121	121	121	121
State Measurement Program	532	532	532	532
Total Hours	147,166	155,529	163,891	155,529

Table 17: Total Respondents in WasteWise, Challenges and SMP

	Year 1	Year 2	Year 3
WasteWise	1,365	1,425	1,485
Food Recovery Challenge	692	737	782
Electronics Challenge	11	11	11
State Measurement Program	51	51	51
Total Respondents	2,119	2,224	2,329

Table 18: Exclusive Costs of WasteWise and Challenges

	Year 1	Year 2	Year 3
WasteWise	\$3,384,815.75	\$3,088,207.25	\$3,243,321.25
Food Recovery Challenge	\$2,347,805.00	\$2,137,768.00	\$2,265,034.25
Electronics Challenge	\$8,382.00	\$8,382.00	\$8,382.00
State Measurement Program	\$25,407.90	\$25,407.90	\$25,407.90
Total Cost	\$5,766,410.65	\$5,259,765.15	\$5,542,145.40

Table 19: Hosting and Maintenance Fees

	Year 1	Year 2	Year 3
WasteWise hosting and maintenance fee	\$84,000.00	\$84,000.00	\$84,000.00
State Measurement Program hosting and maintenance fee	\$80,000.00	\$80,000.00	\$80,000.00
Total Hosting Costs	\$164,000.00	\$164,000.00	\$164,000.00

Table 20: Summarized Agency Costs

	Year 1	Year 2	Year 3
Agency Cost from SMM Challenges	\$402,700.00	\$401,550.00	\$438,100.00
Agency Cost from SMP	\$33,727.30	\$33,727.30	\$33,727.30
Total Agency Costs	\$436,427.30	\$435,277.30	\$471,827.30

Table 21: Aggregated Total Cost of WasteWise, Challenges and SMP

	Year 1	Year 2	Year 3

WasteWise	\$3,384,815.75	\$3,088,207.25	\$3,243,321.25
WasteWise and Challenge hosting and maintenance fee	\$84,000.00	\$84,000.00	\$84,000.00
Food Recovery Challenge	\$2,347,805.00	\$2,137,768.00	\$2,265,034.25
Electronics Challenge	\$8,382.00	\$8,382.00	\$8,382.00
State Measurement Program	\$25,407.90	\$25,407.90	\$25,407.90
State Measurement Program hosting and maintenance fee	\$80,000.00	\$80,000.00	\$80,000.00
Total Cost	\$5930410.65	\$5,423,765.15	\$5706145.4

Table 22: State Government Burden

Hours per response:	10
Cost per response:	\$1,569

Table 23: Private Sector Summary

Total Respondents	673
Total Responses	2,173
Hours per Response	39
Annual Time Burden Hours	154,997

VI. Appendix I

Table 24: Surveyed Cost and Burden from SMP Participants

EPA Region	State	Estimated hours	\$/staff*	Estimated Costs	Notes
4	Alabama	<u>14</u>	<u>\$42.78</u>	\$605	
10	Alaska	<u>14</u>	<u>\$36.39</u>	\$515	NO DATA
9	Arizona	<u>3</u>	<u>\$53.99</u>	\$162	Actual costs
6	Arkansas	<u>14</u>	<u>\$39.30</u>	\$556	
9	California	<u>32</u>	<u>\$56.37</u>	\$1,804	Actual costs
8	Colorado	<u>14</u>	<u>\$49.86</u>	\$706	
1	Connecticut	<u>14</u>	<u>\$55.44</u>	\$784	Has data
1	Delaware	<u>14</u>	<u>\$36.13</u>	\$511	
4	Florida	<u>14</u>	<u>\$31.76</u>	\$449	
4	Georgia	<u>14</u>	<u>\$33.63</u>	\$476	
9	Hawaii	<u>14</u>	<u>\$42.61</u>	\$603	
10	Idaho	<u>14</u>	<u>\$51.82</u>	\$733	NO DATA
5	Illinois	<u>14</u>	<u>\$47.78</u>	\$676	
5	Indiana	<u>14</u>	<u>\$33.30</u>	\$471	
7	Iowa	<u>3</u>	<u>\$49.72</u>	\$149	Actual costs
7	Kansas	<u>12</u>	<u>\$39.17</u>	\$470	Actual costs
4	Kentucky	<u>10</u>	<u>\$34.22</u>	\$342	Actual costs
6	Louisiana	<u>14</u>	<u>\$42.06</u>	\$595	Looking to participate
1	Maine	<u>12</u>	<u>\$40.79</u>	\$490	Actual costs
3	Maryland	<u>14</u>	<u>\$48.88</u>	\$692	
1	Massachusetts	<u>14</u>	<u>\$58.96</u>	\$825	
5	Michigan	<u>14</u>	<u>\$47.17</u>	\$667	
5	Minnesota	<u>14</u>	<u>\$48.64</u>	\$688	Has Data
4	Mississippi	<u>14</u>	<u>\$30.51</u>	\$432	
7	Missouri	<u>3</u>	<u>\$32.84</u>	\$99	Actual costs
8	Montana	<u>14</u>	<u>\$40.66</u>	\$575	
7	Nebraska	<u>12</u>	<u>\$35.20</u>	\$422	Actual costs
9	Nevada	<u>12</u>	<u>\$43.07</u>	\$517	
1	New Hampshire	<u>14</u>	<u>\$46.02</u>	\$651	New staff
2	New Jersey	<u>14</u>	<u>\$55.47</u>	\$785	
6	New Mexico	<u>14</u>	<u>\$40.83</u>	\$578	
2	New York	<u>14</u>	<u>\$51.26</u>	\$725	In system for electronics
4	North Carolina	<u>14</u>	<u>\$34.40</u>	\$487	
8	North Dakota	<u>14</u>	<u>\$40.53</u>	\$573	
5	Ohio	<u>14</u>	<u>\$42.63</u>	\$603	
6	Oklahoma	<u>14</u>	<u>\$34.14</u>	\$483	Has data

10	Oregon	<u>14</u>	<u>\$42.71</u>	\$604	<u>Has data</u>
3	Pennsylvania	<u>14</u>	<u>\$44.30</u>	\$627	<u>Has data</u>
1	Rhode Island	<u>14</u>	<u>\$55.99</u>	\$792	<u>Has data</u>
4	South Carolina	<u>14</u>	<u>\$30.69</u>	\$434	
8	South Dakota	<u>14</u>	<u>\$38.27</u>	\$542	
4	Tennessee	<u>14</u>	<u>\$39.36</u>	\$557	<u>Actual costs</u>
6	Texas	<u>14</u>	<u>\$41.65</u>	\$589	
8	Utah	<u>14</u>	<u>\$37.45</u>	\$530	
1	Vermont	<u>14</u>	<u>\$48.05</u>	\$680	
3	Virginia	<u>14</u>	<u>\$48.16</u>	\$681	
10	Washington	<u>14</u>	<u>\$42.46</u>	\$601	<u>Has Data</u>
3	West Virginia	<u>14</u>	<u>\$33.01</u>	\$467	<u>Has some data</u>
5	Wisconsin	<u>12</u>	<u>\$43.03</u>	\$516	
8	Wyoming	<u>14</u>	<u>\$42.69</u>	\$604	<u>NO DATA</u>
3	District of Columbia	14	<u>\$42.55</u>	\$511	
	<i>Total</i>			\$29,637.56	

* Assumptions:

Bolded hours are actual hours specific states said it took to participate in the SMP. All other hours are the estimated 14.15 hours to complete the SMP (see Table 24) times average state salary plus 55% overhead. Actual burden costs are assumed to be based upon these 14.15 hours or the actual hours submitted by states. Specific state salary came from the US Census State Government Employment and Payroll Survey, March 2016 released on October 19, 2017 with the average per hour cost for [a Full Time Equivalent \(FTE\) Natural Resource Government Employee](#). * D.C. was placed at the national average cost since there was no D.C. data provided.

Highlighted states have not participated in the program and Alaska, Idaho and Wyoming do not have any data to share, now. However, burden costs are figured at 100% participation since that is the goal of this voluntary program.

None of the territories are participating or expected to in the foreseeable future. Only District of Columbia has participated.

Column (\$per staff) comes from analysis of Census State Hourly Wages for each state plus 55% benefits.

VII. Appendix II

Table 25: Estimated SMP Commitment from Regional Response

Region	# of States	Ave Salary	FTE Commitment	Average
1	6	\$120,187	2.5%	\$3,004.68
2*	4	\$124,037	2.5%	\$3,100.93
3*	6	\$99,282	2.5%	\$2,482.05
4	8	\$114,802	20%	\$23,852.00
5	6	\$135,006	5.0%	\$7,244.00
6	5	\$107,263	2.5%	\$2,681.58
7	4	\$109,915	5.0%	\$5,495.75
8	6	\$108,938	1.0%	\$1,089.38
9	4	\$126,983	2.5%	\$3,174.58
10	4	\$96,171	2.5%	\$2,404.28
<i>Total</i>	53	\$1,142,584	2.5%	\$54,529.21
<i>Average</i>		\$114,258.40		
<i>EPA HQ</i>				\$62,933
				\$117,462

Assumptions:

Regional administrative work involves twenty plus one hour calls a year, ongoing work with the states, follow up work from several calls and webinars, and annual QAQC work with state submittals. Some attend the annual Measurement Matters meeting (four hours) at the annual Resource Recycling Conference. Assume 5% FTE maximum time. Most average is 2.5%. Region 4, as the originators and co-leads provide extensive support which is documented to be at least 20% time while Region 5 as the co-lead has provided more staff with their hours included. Region 7 documented 5% time while Region 8 staffing issues limited their participation. Salary Source: <https://www.fedsdatacenter.com/federal-pay-rates/> for 2015/6. EPA multiplied basic hourly rates by the standard overhead factor of 1.55 to obtain the loaded labor rates shown in Table 25.

Attachment 1 - WasteWise Forms

WasteWise Registration Form

Waste Wise Participation Agreement Form

WasteWise Partner Baseline Data Form

WasteWise Partner Baseline Goals Form

WasteWise Partner Annual Data Form

Waste Wise Partner Annual Goals Form

WasteWise Endorser Registration Form

Waste Wise Endorser Agreement Form

WasteWise Endorser First Year Goals

Waste Wise Endorser Annual Data Forms

Waste Wise Endorser Annual Goals Form

Attachment 2 - Food Recovery Challenge Forms

Food Recovery Challenge (FRC) Participant Registration Form

Food Recovery Challenge (FRC) Participant Agreement Form

Food Recovery Challenge (FRC) Participant Baseline Data Form

Food Recovery Challenge (FRC) Participant Baseline Goals Form

Food Recovery Challenge (FRC) Participant Annual Data Form

Food Recovery Challenge (FRC) Participant Annual Goals Form

Food Recovery Challenge (FRC) Endorser Registration Form

Food Recovery Challenge (FRC) Endorser Agreement Form

Food Recovery Challenge (FRC) Endorser First Year Goals Form

Food Recovery Challenge (FRC) Endorser Annual Data Forms

Food Recovery Challenge (FRC) Endorser Annual Goals Form

Attachment 3 - Electronics Challenge Forms

Electronics Challenge (EC) Participant Registration Form

Electronics Challenge (EC) Participant Agreement Form

Electronics Challenge (EC) Participant Baseline Data Form

Electronics Challenge (EC) Participant Annual Data Form

Electronics Challenge (EC) SMM Electronics Challenge Award

Attachment 4 - State Measurement Forms

State Measurement Template

Resource Module

Feedback Form

Demographics Form