

**SUPPORTING STATEMENT FOR
AN INFORMATION COLLECTION REQUEST (ICR)**

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) School Integrated Pest Management Awards Program

EPA ICR No.: 2531.02

OMB Control No.: 2070-0200

Docket ID No.: EPA-HQ-OPP-2019-0356

1(b) Short Characterization

This is a renewal information collection request (ICR) that will cover the paperwork activities associated with the U.S. Environmental Protection Agency's new program to encourage the use of Integrated Pest Management (IPM) as the preferred approach to pest control in the nation's schools. IPM is a smart, sensible, and sustainable approach to pest control that emphasizes the remediation of pest conducive conditions. IPM combines a variety of pest management practices to provide effective, economical pest control with the least possible hazard to people, property, and the environment. These practices involve exclusion of pests, maintenance of sanitation, and the judicious use of pesticides.

The EPA's vision is that all students in the U.S. will experience the benefits provided by an IPM program in their school districts. The Agency's IPM implementation efforts are based on a wholesale approach aimed at kindergarten through 12th grade public and Tribal schools. The Agency intends to use the information collected through this ICR to encourage school districts to implement IPM programs and to recognize those that have attained a notable level of success. Since IPM implementation occurs along a continuum, the School IPM (SIPM) Awards program will recognize each milestone step a school district must take to begin, grow, and sustain an IPM program.

This program has five award categories - *Great Start*, *Leadership*, *Excellence*, *Sustained Excellence*, and *Connector*. The first four categories are stepwise levels that are reflective of the effort, experience, and, ultimately, success that results from implementing EPA-recommended IPM tactics that protect human health and the environment. Schools with pest infestations are not only exposed to potential harm to health and property, but also to stigmatization. The School IPM recognition program will give districts across the nation the opportunity to receive positive reinforcement through public recognition of their efforts in implementing pest prevention and management strategies.

After this information collection request was initially sought in 2016, the School IPM awards program was not launched due to a change in focus for IPM efforts to include agriculture, vector management, and additional structural areas. However, with this renewal, the Agency is working to implement the School IPM Awards Program. The program follows the model of the Agency's *Indoor Air Quality Tools for Schools* program that recognized schools for achievements in improving indoor air quality. The highly successful *Tools for Schools* program was active for ten years and employed the same tiered approach as the SIPM awards program. The SIPM awards program will connect the Agency with school districts to encourage

IPM and foster models for other districts to utilize when implementing a sustainable IPM program.

The awards program provides incentives for sustainable IPM practices in school districts, as well as recognizing individuals and non-school entities for their support of initiating and sustaining successful IPM programs in schools. School districts and other participating entities seeking recognition for their IPM programs will need to maintain detailed records on a variety of activities and send completed applications to EPA for each award to which they aspire. As part of their activities, participants will need to develop an IPM policy and update their IPM plans annually. Applicants will provide information describing how they have met the requirements for the award category to which they are applying. There are four progressive levels of award for school districts (i.e., *Great Start, Leadership, Excellence, and Sustained Excellence*); the *Connector* award is open to non-school entities and individuals.

Comprehensive school IPM programs create safer and healthier learning environments by helping to effectively manage pests, reduce children's unnecessary exposure to pests and pesticides, and reduce pest complaints. A relatively small percentage of U.S. K-12 schools currently have verifiable IPM programs. The information collected will substantiate the implementation of the actions required along the IPM continuum from program initiation to robust, sustained implementation.

The SIPM awards program will initially place more focus on school districts rather than individual schools. This is primarily due to the resource requirements to process applications from individual schools on a national scale.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

Section 13101(b) of the Pollution Prevention Act of 1990, 42 U.S.C. sets forth "the national policy of the United States that pollution should be prevented or reduced at the source whenever feasible." Section 13102(4) defines source reduction as any practice that "reduces the amount of any hazardous substance ... released into the environment" and "reduces the hazards to public health and the environment associated with the release of such substances." To implement this policy, Section 13103(b)(5) of the Act directs the Administrator of EPA to, among other things; "facilitate the adoption of source reduction techniques by business" (see **Attachment A**).

Section 3 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), 7 U.S.C. 136a, requires EPA to regulate pesticides to prevent "unreasonable adverse effects" on human health and the environment (**Attachment B**). IPM strategies, such as removing sources of food, water, and shelter for pests, reduce pest problems and the unnecessary use of pesticides.

The Food Quality Protection Act (FQPA) of 1996 (7 USC 136r-1) requires the U.S. Department of Agriculture and EPA to implement programs in research, demonstration, and education to support the adoption of IPM, make information on IPM widely available to pesticide users, use IPM techniques in carrying out pest management activities, as well as

promote IPM through procurement, regulatory policies and other activities (**Attachment C**). The SIPM awards program is a non-regulatory approach to meet the goals of the Pollution Prevention Act, FIFRA and FQPA to reduce pesticide risks in non-agricultural settings.

The collection of information that documents and measures applicant accomplishments enables EPA to fairly and accurately assess program effectiveness and benefits of awards. Completed applications, including contact information, are preliminary to EPA's formal recognition. The applications will allow EPA to understand and promote each school district's efforts. In addition, this program will measure individual and collective program progress in School IPM implementation.

2(b) Practical Utility/Users of the Data

The information collected by the SIPM awards program is not designed or intended to support EPA regulatory decision-making. EPA intends to use the information collected through award program applications to:

- Determine applicant eligibility for award recognition.
- Identify school districts' commitment to promoting and implementing IPM practices.
- Verify participation in promoting and implementing IPM practices.
- Define the existing landscape and implementation status of IPM practices in school districts nationally.
- Measure environmental outcomes.

The Agency will use this data to:

- Develop case studies that demonstrate the importance of IPM implementation in school districts.
- Encourage replication of best practices for adopting, implementing and sustaining comprehensive school IPM programs.
- Share information on IPM practices that school districts can incorporate into other environmental health initiatives (for example, indoor air quality management, asthma management, etc.) Provide a better understanding of how schools can effectively manage environmental issues when faced with budgetary and personnel challenges.

In addition, EPA will analyze the data, to the extent possible, to look for environmental trends and highlight program successes by posting information on the Agency's IPM website.¹

As will be discussed in Section 3(f) of this ICR, the EPA will not publish business information reported by award program applicants. Data will only be shared publicly in aggregate form unless otherwise specified and agreed to by the affected school district or awardee.

3. NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Non-Duplication

¹ <http://www2.epa.gov/managing-pests-schools> (accessed July X, 2019)

The information to be collected by EPA's SIPM awards program is unique and is not duplicative of other collections. For example, data submitted through the award applications are specific to the tasks required to implement an IPM programs in schools. Applicants will not be asked to provide information that has been, or is currently being collected by EPA, other federal or state agencies, or proprietary sources. While some state and local government agencies may require pesticide users to maintain records of pesticide use and IPM, they may not require it to be reported. As detailed below, in those instances when a government or private entity collects pesticide use and IPM data, it is not of the scope or detail needed to operate the SIPM awards program. The EPA consulted with trade associations, nonprofit groups, school districts, and other potential participants to confirm that the information being collected by the SIPM awards program does not exist elsewhere.

While developing the IPM measures, the Agency consulted with the Pesticide Program Dialogue Committee (PPDC), a Federal Advisory Committee Act advisory board to the Agency's Office of Pesticide Programs. The PPDC is a cross-section of entities with interest in pesticide-related matters, including IPM, with representatives from the private sector, nongovernmental entities, and the federal government. Within the PPDC, there was a workgroup focused on IPM. While EPA did not provide the PPDC with details on the information being requested from award program applicants, the committee provided advice on long-term program goals. (Link at the bottom of page 3.)

The level of detailed information required for the SIPM awards program is not available through other organizations. Some states collect pesticide use information. Of these, California's data collection is one of the most comprehensive. Even so, its scope is too limited for the purpose of this award program because: 1) the reporting is not focused on school IPM; and 2) the reporting only applies to California while the Agency's award program is a nationwide program.

State governments' pest management reports may also not be consistently available due to changes in reporting requirements or states' priorities. An example of a state government pesticide data collection program with such limitations is Oregon.² In 2009, Oregon canceled its pesticide use reporting requirements because budgetary constraints limited the state's ability to use the data to develop and publish reports.

Some states currently have school IPM requirements based on legislation. These laws vary in breadth and rigor but all deal with some element of pesticide application in or around schools, for example pesticide use notification requirements. Alabama, Louisiana, North Carolina, and Texas have regulations on restricted spray zones that impact schools. Some states require IPM training for those applying pesticides in schools, others define the type of pesticide products that can be used in schools, while others require detailed IPM programs for all schools. The variety of School IPM-related requirements and pesticide data collection mechanisms across all states make it difficult for the EPA to access and use these data. Furthermore, the EPA SIPM awards applications are designed to assess only those activities required to implement an IPM program in a school district. No governmental entity is collecting the data the Agency needs to assess IPM implementation in school districts across the nation. Thus, the EPA believes that the information requested through the ICR is not duplicative.

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

² [Pesticide Use Reporting System \(PURS\)](#)

Pursuant to 5 CFR 1320.8(d), the EPA published a Federal Register Notice announcing this proposed information collection activity and provided a 60-day public comment period. EPA did not receive any comments in response to the previously provided public review opportunity issued in the **Federal Register** on September 9, 2019 (84 FR 47285).

3(c) Consultations

In addition to the initial survey for SIPM, under 5 CFR 1320.8(d)(1), agencies are required to consult with respondents about specific aspects of information collection before submitting approval requests to OMB. In accordance with this regulation, EPA staff contacted representatives from a cross section of stakeholders to seek feedback on the burden estimates in this ICR, and on the clarity of the information collection process. The following four stakeholders were contacted and agreed to receive consultations questions for their responses:

Peggy Caruso
Katy Independent School District, TX

John Bailey
Chesapeake Public Schools, VA

Dawn Gouge
University of Arizona Extension Service, AZ

Janet Hurley
Texas A&M, Extension Service, TX

A summary of these consultations is provided in the supporting statement. (**Attachment D**).

3(d) Effects of Less Frequent Collection

The EPA requests that School IPM awardees submit applications at least every two years to maintain their award status level. Because of the intended high visibility of the program, less frequent resubmission could compromise program integrity. It will also take time for a school district to implement their IPM program and report on its results. The Agency believes that the two-year timeframe gives schools the flexibility needed to complete a School IPM award application and, subsequently begin or further develop their IPM program.

3(e) General Guidelines

The information collection activities discussed in this ICR comply with all regulatory guidelines under 5 CFR 1320.5(d) (2). School IPM award program applicants will not need to retain records for this program for more than one year with the exception if the applications are committed to maintain awardee status or to move to the next award in the program. SIPM awards program participants may resubmit applications every two years to maintain awardee status or to move to the next level in the program.

3(f) Confidentiality

EPA has implemented procedures to protect any confidential, trade secret or proprietary

information from disclosure that provide strict instructions regarding access to and contact with documents confidential business information (CBI). These procedures comply with EPA’s CBI regulations at 40 CFR Part 2, Subpart B. The reporting method and system prevents access to and distribution of business information reported by School IPM awardees. Data will only be shared publicly in aggregate form unless otherwise specified and agreed to by the affected awardee.

3(g) Sensitive Questions

This information collection activity complies with the provisions of the Privacy Act of 1974 and OMB Circular A-108, as amended, “Responsibilities for the Maintenance of Records about Individuals by Federal Agencies.” No information of a sensitive or private nature is requested in conjunction with this information collection activity. EPA aggregates data before sharing it with any party outside of the Agency. School IPM data sharing activities protect an organization’s data by presenting them in a general and unidentifiable manner unless otherwise specified and agreed to by the affected awardee.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents and NAICS codes

School districts, or entities that represent them, are the target applicant pool for the SIPM awards program.

Below is a list of North American Industry Classification System (NAICS) codes and associated industries that may be affected by information collection requirements covered under this ICR. This list is intended to be illustrative; entities from other industries may elect to apply for recognition through the SIPM awards program. However, EPA expects that most applications will come from public kindergarten through 12th grade schools.

NAICS Code	Affected Industry
6111	Elementary and Secondary Schools
6244	Child Day Care Services
56172	Janitorial Services
56173	Landscaping Services
56171	Exterminating and Pest Control Services
5617	Services to Buildings and Dwellings

4(b) Information Requested

School districts seeking recognition in the EPA SIPM awards program must fill out one or more of five award applications (**Attachment E**). These applications are:

- The *Great Start* application is required for the *Great Start* award. This award recognizes districts that are starting an IPM program.

- The *Leadership* award application is required for the *Leadership* award. This award requires a school district to demonstrate how its IPM program was implemented to include staff education and the definition of roles and responsibilities.
- The *Excellence* award application is required for the *Excellence* award. This is the middle tier of the award program. For this award, applicants must show how employees have received IPM education, how IPM-related maintenance is performed, and pest monitoring is being tracked.
- The *Sustained Excellence* award application is required for the *Sustained Excellence* award. This level builds on the *Excellence* award by requiring school districts to provide documentation of pest proofing or pest prevention by design. This is in addition to documenting how employees are educated on IPM, how pest proofing repairs are made, and that pest monitoring is being conducted and tracked.
- The *Connector* award application is required for the *Connector* award. This award is reserved for the individual or organization that can demonstrate playing a key role in implementing an IPM program in a school district.

The time and effort to complete the application form for each type of data collection varies. For example, the *Great Start* award only requires applicants to complete a narrative for an IPM plan and commit to appointing an IPM coordinator. It does not require the specific measures and progress tracking elements present in the *Excellence* award. Consequently, completing the application for the *Great Start* award is less burdensome than completing the application for the *Excellence* award.

The School IPM information collection instrument assumes that a number of different employees or contractors can complete the data collection task for the school district. These could include the IPM coordinator, health and safety coordinator, quality assurance specialist, pest management professional, campus facility supervisor, custodian, groundskeeper, and food service personnel. Each award has a different information collection demand.

The EPA assumes that all the paperwork burden incurred by individual schools as well as by their districts to maintain records and to report (apply) for the incentive program are included in the burden estimates provided in the survey responses submitted by the school districts. This assumption is since many schools are already positioned for such school-to-district reporting either because of existing pesticide, IPM, or school environmental health reporting requirements. In such cases, information reported by individual schools are already compiled and maintained at the district level.

The School IPM awards allow for rolling applications, i.e., applications can be submitted at any time during the year. EPA will process each application within 60 days of submission. EPA will make award presentations to awardees monthly as applications are approved.

The standard threshold for the four-tiered awards that recognize school districts increases as an applicant seeks higher levels of recognition. The exception is for the *Connector* award which recognizes an organization or individual for “connecting” school districts to help

implement an IPM program. This award program recognizes the incremental steps it takes to implement IPM in a school district. Each award category and its requirements are explained in section 4(c) of this ICR.

4(c) Incentive Program Conditions and Criteria

The School IPM Awards conditions and criteria, which are summarized below, are detailed in **Attachment F**.

Great Start Award

The ***Great Start*** award is presented to school districts that are in the initial stages of implementing an effective IPM program. Applicants must have selected an IPM coordinator for the district and created a written IPM policy to receive this award.

Leadership Award

The ***Leadership*** award is presented to school districts with a senior-level commitment to establish and maintain an IPM program as well as to relate their IPM strategies to the framework for effective school IPM programs (i.e., Organize, Assess, Plan, Act, Evaluate, and Communicate).

Excellence Award

To merit an ***Excellence*** award, applicants need to tell the story of their IPM program in a way that demonstrates the program is comprehensive, effective, and moving towards being institutionalized as part of a comprehensive environmental health program in the district. Specifically, the EPA will look for evidence that:

- The critical components of the framework for effective school IPM programs (i.e., Organize, Assess, Plan, Act, Evaluate, and Communicate) are embodied in the school environmental health management program;
- An established system exists to ensure consistent and sustained action to identify, address and prevent pest problems; and
- Evidence that the program is achieving results.

Sustained Excellence Award

To merit a ***Sustained Excellence*** award, applicants must meet the requirements of the previous levels of award criteria for at least two years after receiving ***Excellence*** award recognition. Applicants must demonstrate that its IPM program is sustainable by providing documentation for pest reduction, health improvements, and financial benefits. Lastly, ***Sustained Excellence*** award applicants must show how the school district communicates about its IPM program, both to its internal community (students, parents, employees) and to the external community (other districts, surrounding neighborhood, and community leaders).

Connector Award

The *Connector* award is designed to give national recognition to individuals and organizations whose actions and initiatives support improved school environmental health in their community, region, state, or even nationally, with a special focus on actions and initiatives that reflect the spirit of the award. Examples include the following:

- Development of innovative initiatives, approaches, tools, or resources that have contributed to improved school IPM and indoor environments;
- Outstanding individuals and groups who have played a coordinating function to bring people or IPM programs together to provide mutual assistance and support in school IPM implementation;
- Leadership/mentorship of school or school district's IPM program;
- Technical assistance in IPM program implementation;
- Increasing student involvement in IPM, such as integration of science clubs; and
- Other actions and initiatives that foster interconnectedness and mutual support and demonstrate results as part of these efforts.

5. THE INFORMATION COLLECTED – AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

Under the School IPM award program, the EPA engages in the following activities:

Award Application Processing

- Organize applications by EPA region as they are submitted. Track applicants in detailed tracking spreadsheet.
- Print each application with scoring sheet with evaluation criteria. Create large binder for reviewers that contains all the applications and scoring sheets.
- Determine who will be participating on the review panel. Preferably an odd number of people. Depending on number of applications, provide lead time of two weeks for reviewers to read and score each application.
- Provide EPA Regional staff with PDF versions of applications for their review and weigh-in as personnel that may have worked with the districts specifically.
- In two weeks, assimilate reviewers' scores and hold a half-day consensus meeting to determine which school districts are worthy of awards. During this meeting, each applicant is discussed, and the strengths and weaknesses of their application documented. This information will be used in follow-up communications with unsuccessful applicants to help them improve future applications.
- Provide a list of recommended awardees to EPA Regional and Headquarters' senior management for approval.
- Send an internal announcement email to EPA staff about award-winning applicants. Contact all the applicants being recognized and offer to hold teleconferences with

those applicants not chosen to share consensus meeting feedback about strengths and areas of improvement for future applications.

- If there is an event designated for highlighting the award-winning school districts and invitational travel is involved, convey the logistics to the selected applicants.
- Using award-winning applications, create communications materials to showcase these programs. Initiate comprehensive outreach communications plan (develop press release, secure senior-level Agency official quote, Facebook postings, and Twitter postings). If necessary, assist applicants with promoting their award using approved EPA messaging about the awards program and showcasing SIPM success stories.

In addition to the above listed activities, the Agency also performs an environmental and criminal compliance screening to ensure that all awardees have no outstanding compliance issues. The EPA performs this task by checking Agency databases both at headquarters and the regions.

5(b) Collection Methodology and Management

Prospective applicants can obtain the SIPM awards application forms upon request from the Agency. The Agency is currently designing a website where the SIPM awards application forms will be available online (**Attachment H**). The application forms were designed to have a minimum burden on the user.

Once complete, the form is submitted online through email to EPA. Application processing can take up to 60 days because of compliance screening. The EPA will review each applicant's environmental compliance history. To receive recognition, school districts must pass the compliance screening and criteria set forth by the award level.

In collecting and analyzing the information associated with this ICR, the EPA will use a telephone system, personal computers, email and applicable PDF-generating software.

5(c) Small Entity Flexibility

The EPA expects to receive applications to the SIPM program from a variety of school districts and organizations. Award applications are designed to minimize respondent burden while obtaining enough and accurate information. The Agency will review members' applications, making allowances on a case-by-case basis for the inapplicability of certain elements and the applicants' abilities to provide the information.

Since membership in the SIPM awards program is voluntary, applicants may also elect to withdraw from the program, at any time, if they do not wish to submit applications needed to maintain their award status. The EPA requires that all awardees submit applications every two years to maintain recognition status.

5(d) Collection Schedule

Organizations may submit application forms at any time. The SIPM program is a rolling admission program. The EPA will approve or reject all applications within 60 days of submission.

School districts may submit the *Great Start, Leadership, Excellence, Sustained Excellence*, and *Connector* award at any time of the year. The EPA will seek to hold an annual recognition ceremony for awardees at a conference that attracts school districts and key stakeholders' leadership.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

Respondent paperwork burden of participating in the SIPM awards program consists primarily of the administrative burden associated with applying for the different types of awards. This involves preparation, submission, and recordkeeping of an application form.

To estimate average annual paperwork burden on respondents, estimated cost per respondent is multiplied by the total number of respondents, which are projected based on past data. However, since this is a new program there are no past data on the number of applicants to develop such projections. Therefore, as a proxy for the SIPM awards program, the Agency used the data on the number of applicants from its Indoor Air Quality (IAQ) project. As discussed in previous sections of this ICR, the Agency modeled the SIPM awards program after the IAQ *Tools for Schools* program and believes the initial level of participation may be similar.

Annual Respondent Numbers (Data from EPA's IAQ Tools for Schools Awards Program)

Year	Great Start Applicants	Leadership Applicants	Excellence Applicants	Model of Sustained Applicants	Special Achievement Applicants*	Total Applications Received
2009	18	12	13	3	5	51
2008	14	12	6	4	3	39
2007	42	6	8	6	8	70
Annual Average	25	10	9	4	5	53

* IAQ Connector Award started in 2009

Burden estimates were prepared for the average time necessary to perform each activity in preparation, submission, and recordkeeping of an application for each award type. Burden estimates are based on interviews conducted with representative respondents. Each of the three school districts surveyed and the non-profit organization were provided detailed instructions on how to obtain each requested burden estimate through both phone conversations and written correspondence. Respondents were allowed 30 days to acquire the requested information and provide comments and/or suggestions on program improvement when interacting with potential school districts.

As shown in Section 6(b), Tables 1 – 5, the total annual burden hours associated with applying for an award are 90, 362, 248, 134, and 72 for the *Great Start, Leadership, Excellence, Sustained Excellence*, and *Connector* awards, respectively.

The EPA estimates that, on average, a total of 53 entities per year would participate in the SIPM during a three-year period. Since the past data from the EPA's IAQ project (2000-2010)

show high variability without an increasing or decreasing trend, and the data for 2010 is not complete, the three-year average data over 2007-2009 are used as the projected annual number of applicants for the three-year ICR period. For respondents, the EPA estimates an average of 924 hours for all award categories combined, at a total cost of approximately \$86,000 annually (see Table 11).

6(b) Estimating Respondent Costs

Consistent with recent ICR submissions, the EPA is using labor cost estimates from Agency economists with respect to wages, benefits and overhead for all labor categories for affected industries, state government, and EPA employees. This approach uses a transparent and consistent methodology and current publicly available data to provide more accurate estimates and allow easy replication of the estimates.

Methodology: The calculation of the wage rate uses base wage data for each sector and labor type for an *Unloaded wage rate* (hourly wage rate) and calculates the *Loaded wage rate* (unloaded wage rate + benefits) and the *Fully loaded wage rate* (loaded wage rate + overhead) based on that data. Fully loaded wage rates are used to calculate respondent costs. Cost estimates are based on 2018 wage data.

Unloaded Wage Rate: Wages are estimated for labor types (management, technical, and clerical) within applicable sectors. The Agency uses average wage data for the relevant sectors available in the National Industry-Specific Occupational Employment and Wage Estimates from the Bureau of Labor Statistics (BLS) at <http://www.bls.gov/oes/current/oesrci.htm>.

Sectors: The specific NAICS code and website for each sector is included in that sector's wage rate table in **Attachment G**. Within each sector, the wage data are provided by Standard Occupational Classification (SOC). The SOC system is used by Federal statistical agencies to classify workers into occupational categories for the purpose of collecting, calculating, or disseminating data (see http://www.bls.gov/oes/current/oes_stru.htm). The managerial labor rate is based on the SOC for management occupations, and the clerical labor rate is based on the SOC for office and administrative support occupations. The technical labor rate is based on the SOC for life, physical and social science occupations. For school IPM, the technical rate is based on first-line supervisors/managers of landscaping, lawn service, and grounds keeping workers.

Loaded Wage Rate: Benefits represent approximately 45.8% of unloaded wage rates, based on total benefits for all civilian non-farm workers from <http://www.bls.gov/news.release/ecec.t01.htm>

Fully Loaded Wage Rate: The loaded wage rate is multiplied by 50% (EPA guidelines 20-70%) to get overhead costs.

A copy of the formula work sheets used to estimate the labor rates based on 2018 wage data and to derive the fully loaded rates and overhead costs for this new ICR are provided in **Attachment G**.

Tables 1 - 5 below provide average annual respondent burden and cost estimates by award type.

Table 1. Average Annual Respondent Burden and Cost Estimates - Great Start Award

Collection Activities	Burden Hours			Total	
	Management	Technical	Clerical	Hours	Costs
	\$97.61 per hour	\$71.49 per hour	\$44.46 per hour		
Average time to read instructions	0.2	0.0	0.0	0.2	\$20
Average time to plan activities	0.5	0.0	0.0	0.5	\$49
Average time to gather information	1.0	0.0	0.0	1.0	\$98
Average time to compile and review	1.0	0.0	0.0	1.0	\$98
Average time to complete and submit paperwork	0.8	0.0	0.0	0.8	\$78
Average time to store/maintain data	0.3	0.0	0.0	0.3	\$30
Total per applicant	3.8	0.0	0.0	3.8	\$373
# of applicants/year (3-yr avg. over 2007-2009)	25			95	
Total annual cost					\$9,325

Burden hours are from representative school districts that applied for this award in the past.
Wages rates are from BLS for NAICS 999300 – Local Government. May 2018 data.
Average number of applicants per year and total burden hours are rounded.

In Table 1, the cost to apply for the *Great Start* award is estimated to be \$373 per applicant. Based on the data on the number of applicants from the Agency’s Indoor Air Quality (IAQ) project, 25 entities are estimated to apply for this award annually for the three-year ICR period. The estimated total burden hours are 95 hours and total cost is \$9,325.

Table 2. Average Annual Respondent Burden and Cost Estimates - Leadership Award

Collection Activities	Burden Hours			Total	
	Management	Technical	Clerical	Hours	Costs
	\$97.61 per hour	\$71.49 per hour	\$44.46 per hour		
Average time to read instructions	1.0	0.0	0.0	1.0	\$98
Average time to plan activities	1.5	0.0	0.0	1.5	\$146
Average time to gather information	5.0	0.0	0.0	5.0	\$488
Average time to compile and review	14.0	0.0	0.0	14.0	\$1,366
Average time to complete and submit paperwork	14.0	0.0	0.0	14.0	\$1,366
Average time to store/maintain data	2.0	0.0	0.0	2.0	\$195
Total per applicant	37.5	0.0	0.0	37.5	\$3,659
# of applicants/year (3-yr avg. over 2007-2009)	10			362	
Total annual cost					\$36,602

Burden hours are from representative school districts that applied for this award in the past.
Wages rates are from BLS for NAICS 999300 – Local Government. May 2018 data.
Average number of applicants per year and total burden hours are rounded.

In Table 2, the cost to apply for the *Leadership* award is estimated to be \$3,659 per applicant. Based on the data on the number of applicants from the Agency’s Indoor Air Quality (IAQ) project, 10 entities are estimated to apply for this award annually for the three-year ICR period. The estimated total burden hours are 362 hours and total cost is \$36,602.

Table 3. Average Annual Respondent Burden and Cost Estimates - Excellence Award

Collection Activities	Burden Hours			Total	
	Management	Technical	Clerical	Hours	Costs
	\$97.61 per hour	\$71.49 per hour	\$44.46 per hour		
Average time to read instructions	0.5	0	0	0.5	\$49
Average time to plan activities	2.0	2.0	0	4.0	\$338
Average time to gather information	8.0	8.0	0	16.0	\$1,353
Average time to compile and review	3.0	0	0	3.0	\$293
Average time to complete and submit paperwork	3.0	0	0	3.0	\$293
Average time to store/maintain data	1.0	0	0	1.0	\$98
Total per applicant	17.5	10	0	27.5	\$2,424
# of applicants/year (3-yr avg. over 2007-2009)	9			247.5	
Total annual cost					\$21,816

Burden hours are from representative school districts that applied for this award in the past.

Wages rates are from BLS for NAICS 999300 – Local Government. May 2018 data.

Average number of applicants per year and total burden hours are rounded.

In Table 3, the cost to apply for the *Excellence* award is estimated to be \$2,424 per applicant. Based on the data on the number of applicants from the Agency’s Indoor Air Quality (IAQ) project, 9 entities are estimated to apply for this award annually for the three-year ICR period. The estimated total burden hours are 247.5 hours and total cost is \$21,816.

Table 4. Average Annual Respondent Burden and Cost Estimates - Sustained Excellence Award

Collection Activities	Burden Hours			Total	
	Management	Technical	Clerical	Hours	Costs
	\$97.61 per hour	\$71.49 per hour	\$44.46 per hour		
Average time to read instructions	2.0	0.0	0.0	2.0	\$195
Average time to plan activities	4.0	4.0	0.0	8.0	\$676
Average time to gather information	4.0	4.0	0.0	8.0	\$676
Average time to compile and review	4.0	4.0	0.0	8.0	\$676
Average time to complete and submit paperwork	2.0	2.0	0.0	4.0	\$338
Average time to store/maintain data	1.0	0.0	0.0	1.0	\$98
Total per applicant	17	14	0	31	\$2,659
# of applicants/year (3-yr avg. over 2007-2009)	4			124	
Total annual cost					\$10,636

Burden hours are from representative school districts that applied for this award in the past.

Wages rates are from BLS for NAICS 999300 – Local Government. May 2018 data.

Average number of applicants per year and total burden hours are rounded.

In Table 4, the cost to apply for the *Sustained Excellence* award is estimated to be \$2,659 per applicant. Based on the data on the number of applicants from the Agency’s Indoor Air Quality (IAQ) project, 4 entities are estimated to apply for this award annually for the three-year ICR period. The estimated total burden hours are 124 hours and total cost is \$10,636.

Table 5. Average Annual Respondent Burden and Cost Estimates - Connector Award

Collection Activities	Burden Hours			Total	
	Management	Technical	Clerical	Hours	Costs
	\$97.61 per hour	\$71.49 per hour	\$44.46 per hour		
Average time to read instructions	0.5			0.5	\$49
Average time to plan activities	0.5			0.5	\$49
Average time to gather information	2.0			2.0	\$195
Average time to compile and review	6.5			6.5	\$634
Average time to complete and submit paperwork	4.5			4.5	\$439
Average time to store/maintain data	0.4			0.4	\$39
Total per applicant	13.9	0	0	14	\$1,405
# of applicants/year (3-yr avg. over 2007-2009)	5			69.5	
Total annual cost					\$7,025

Burden hours are from representative school districts that applied for this award in the past.

Wages rates are from BLS for NAICS 999300 – Local Government. May 2018 data.

Average number of applicants per year and total burden hours are rounded.

In Table 5, the cost to apply for the *Sustained Excellence* award is estimated to be \$1,405 per applicant. Based on the data on the number of applicants from the Agency’s Indoor Air Quality (IAQ) project, 5 entities are estimated to apply for this award annually for the three-year ICR period. The estimated total burden hours are 69.5 hours and total cost is \$7,025.

6(c) Estimating Agency Burden and Cost

As in the case of respondents, the burden hour data from the EPA’s Indoor Air Quality program is used to estimate the Agency burden and cost.

To determine Agency costs, the EPA used the Bureau of Labor Statistics estimates of labor rates for 2018 for the NAICS code for the Federal Executive Branch (NAICS 999100). The managerial labor rate is based on the Standard Occupational Classification (SOC) for management occupations; the technical labor rate is based on the SOC for life, physical and social science occupations; and the clerical labor rate is based on the SOC for office and administrative support occupations. The labor rates are fully loaded and include benefits and overhead. Detailed labor costs for agency labor is included in **Attachment G**.

Tables 6 to 10 summarize the Agency’s burden hours and costs for the different award categories.

Table 6. Average Annual Agency Burden and Cost Estimates - Great Start Award

Collection Activities	Burden Hours			Total	
	Management	Technical	Clerical	Hours	Costs
	\$132.14 per hour	\$87.24 per hour	\$48.84 per hour		
Average time to read application and determine if applicant met requirements.	0.00	0.13	0.00	0.13	\$11
Average time to accept/deny, create a form letter and print paper certificate. Division Director signature.	0.05	0.08	0.00	0.13	\$14
Average time to create mailing label, track applicant in the awards tracking spreadsheet, mail certificate and letter to applicant.	0.00	0.03	0.00	0.03	\$3
Total per applicant	0.05	0.24	0.00	0.29	\$28
# of applicants/year (3-yr average over 2007-2009)	25			7	
Total annual cost					\$700

Burden hours are from the EPA OAR's Indoor Air Quality program.

Wages rates are from BLS for NAICS 999100 – Federal Government. May 2018 data.

In Table 6, the Agency cost per applicant (\$28) is estimated first and multiplied by the average annual total number of applicants (25) to obtain an estimate (\$700) of the total Agency cost for the *Great Start* award. The per-applicant Agency cost is obtained by summing the products of wage rates (managerial, technical, and clerical) and the per-applicant burden hours for each labor type (0.05 hours of managerial labor, 0.24 hours of technical labor, and zero hours of clerical labor). Note that the total number of applications reviewed by the Agency includes those applications that are not chosen for award as well.

Table 7. Average Annual Agency Burden and Cost Estimates - Leadership Award.

Collection Activities	Burden Hours			Total	
	Management	Technical	Clerical	Hours	Costs
	\$132.14 per hour	\$87.24 per hour	\$48.84 per hour		
Average time to read application and determine if applicant met requirements.	0.0	0.17	0.0	0.17	\$15
Average time to accept/deny, create a form letter and print paper certificate. Division Director signature.	0.05	0.08	0.0	0.13	\$14
Average time to create mailing label, track applicant in the awards tracking spreadsheet, mail certificate and letter to applicant.	0.0	0.03	0.0	0.03	\$3
Total per applicant	0.05	0.28	0.00	0.33	\$31
# of applicants/year (3-yr average over 2007-2009)	10			3	
Total annual cost					\$313

Burden hours are from the EPA OAR's Indoor Air Quality program.

Wages rates are from BLS for NAICS 999100 – Federal Government. May 2018 data.

In Table 7, the Agency cost per applicant (\$31) is estimated first and multiplied by the average annual total number of applicants (10) to obtain an estimate (\$313) of the total Agency cost for the *Leadership* award. The per-applicant Agency cost is obtained by summing the products of wage rates (managerial, technical, and clerical) and the per-applicant burden hours for each labor type (0.05 hours of managerial labor, 0.28 hours of technical labor, and zero hours of clerical labor). Note that the total number of applications reviewed by the Agency includes those applications that are not chosen for award as well.

Table 8. Average Annual Agency Burden and Cost Estimates - Excellence Award

Collection Activities	Burden Hours			Total	
	Management	Technical	Clerical	Hours	Costs
	\$132.14 per hour	\$87.24 per hour	\$48.84 per hour		
Organize applications by region as they are submitted. Track applicants in detailed tracking spreadsheet.	0.00	0.08	0.00	0.08	\$7
Print each application with scoring sheet with evaluation criteria. Create large binder for reviewers that contains all the applications and scoring sheets.	0.00	0.08	0.00	0.08	\$7
Determine who will be participating on the review panel. Preferably odd number of people. Depending on number of applications, provide lead time of two weeks for reviewers to read and score each application.	0.25	0.25	0.00	0.50	\$55
Provide regional staff PDFs of their applicants for their review and weigh-in as personnel that may have worked with districts specifically.	0.00	0.08	0.00	0.08	\$7
In two weeks assimilate all score and hold half day consensus meeting to determine what school districts are awards. During this meeting each applicant is discussed, and strength and weaknesses of the application documented. This information is used in follow up communications (both winners and those not chosen) with the applicants for them to improve their next year's application if they were not chosen this year.	0.00	5.00	0.00	5.00	\$436
Provide a list of selected applicants to recognize; submit to EPA regions and senior management for approval.	0.50	0.50	0.00	1.00	\$110
Conduct compliance scans on school districts and reconcile any issues that may arise.	0.00	0.50	0.00	0.50	\$44
Send an announcement email to internal EPA staff about award winning applicants. Contact via phone all the applicants being recognized and set up phone meetings with those applicants not chosen to share consensus meeting feedback about strengths and areas of improvement of the application.	0.00	0.50	0.00	0.50	\$44
If there is an event designated for highlighting the award-winning school districts and invitational travel involved, convey logistics to selected applicants.	0.00	0.17	0.00	0.17	\$15
Using award winning applications create communications materials to showcase these award-winning programs. Initiate comprehensive outreach communications plan. If necessary, assist applicants with promoting their award using approved EPA messaging about the awards program and showcasing school IPM success stories.	0.50	1.00	0.00	1.50	\$153
Total per applicant	1.25	8.17	0.00	9.42	\$878
# of applicants/year (3-yr average over 2007-2009)	9			85	
Total annual cost					\$7,905

Burden hours are from the EPA OAR's Indoor Air Quality program.
Wages rates are from BLS for NAICS 999100 – Federal Government. May 2018 data.

In Table 8, the Agency cost per applicant (\$878) is estimated first and multiplied by the average annual total number of applicants (9) to obtain an estimate (\$7,905) of the total Agency cost for the *Excellence* award. The per-applicant Agency cost is obtained by summing the products of wage rates (managerial, technical, and clerical) and the per-applicant burden hours for each labor type (1.25 hours of managerial labor, 8.17 hours of technical labor, and zero hours of clerical labor). Note that the total number of applications reviewed by the Agency includes those applications that are not chosen for award as well.

Table 9. Average Annual Agency Burden and Cost Estimates - Sustained Excellence Award

Collection Activities	Burden Hours			Total	
	Management	Technical	Clerical	Hours	Costs
	\$132.14 per hour	\$87.24 per hour	\$48.84 per hour		
Organize applications by region as they are submitted. Track applicants in detailed tracking spreadsheet.	0.00	0.08	0.00	0.08	\$7
Print each application with scoring sheet with evaluation criteria. Create large binder for reviewers that contains all the applications and scoring sheets.	0.00	0.08	0.00	0.08	\$7
Determine who will be participating on the review panel. Preferably odd number of people. Depending on number of applications, provide lead time of two weeks for reviewers to read and score each application.	0.25	0.25	0.00	0.50	\$55
Provide regional staff PDFs of their applicants for their review and weigh-in as personnel that may have worked with a district specifically.	0.00	0.08	0.00	0.08	\$7
In two weeks assimilate all score and hold half day consensus meeting to determine what school districts are awards. During this meeting each applicant is discussed, and strength and weaknesses of the application documented. This information is used in follow up communications (both winners and those not chosen) with the applicants for them to improve their next year's application if they were not chosen this year.	0.00	5.00	0.00	5.00	\$436
Provide a list of selected applicants to recognize; submit to EPA regions and senior management for approval.	0.50	0.50	0.00	1.00	\$110
Conduct compliance scans on school districts and reconcile any issues that may arise.	0.00	0.50	0.00	0.50	\$44
Send an announcement email to internal EPA staff about award winning applicants. Contact via phone all the applicants being recognized and set up phone meetings with those applicants not chosen to share consensus meeting feedback about strengths and areas of improvement of the application.	0.00	0.50	0.00	0.50	\$44
If there is an event for highlighting the award-winning school districts and invitational travel involved, convey logistics to selected applicants.	0.00	0.17	0.00	0.17	\$15
Using award winning applications create communications materials to showcase these award-winning programs. Initiate comprehensive outreach communications plan). If necessary, assist applicants with promoting their award using approved EPA messaging about the awards program and showcasing school IPM success stories.	0.50	1.00	0.00	1.50	\$153
Total per applicant	1.25	8.16	0.00	9.41	\$878
# of applicants/year (3-yr average over 2007-2009)	4			41	
Total annual cost					\$3,512

Burden hours are from the EPA OAR's Indoor Air Quality program.
Wages rates are from BLS for NAICS 999100 – Federal Government. May 2018 data.

In Table 9, the Agency cost per applicant (\$878) is estimated first and multiplied by the average annual total number of applicants (4) to obtain an estimate (\$3,512) of the total Agency cost for the *Sustained Excellence* award. The per-applicant Agency cost is obtained by summing the products of wage rates (managerial, technical, and clerical) and the per-applicant burden hours for each labor type (1.25 hours of managerial labor, 8.16 hours of technical labor, and zero hours of clerical labor). Note that the total number of applications reviewed by the Agency includes those applications that are not chosen for award as well.

Table 10. Average Annual Agency Burden and Cost Estimates - Connector Award

Collection Activities	Burden Hours			Total	
	Management	Technical	Clerical	Hours	Costs
	\$132.14 per hour	\$87.24 per hour	\$48.84 per hour		
Organize applications by region as they are submitted. Track applicants in detailed tracking spreadsheet.	0.00	0.08	0.00	0.08	\$7
Print each application with scoring sheet with evaluation criteria. Create large binder for reviewers that contains all the applications and scoring sheets.	0.00	0.08	0.00	0.08	\$7
Determine who will be participating on the review panel. Preferably odd number of people. Depending on number of applications, provide lead time of two weeks for reviewers to read and score each application.	0.25	0.25	0.00	0.50	\$55
Provide regional staff PDFs of their applicants for their review and weigh-in as personnel that may have worked with a district specifically.	0.00	0.08	0.00	0.08	\$7
In two weeks assimilate all score and hold half day consensus meeting to determine what school districts are awards. During this meeting each applicant is discussed, and strength and weaknesses of the application documented. This information is used in follow up communications (both winners and those not chosen) with the applicants for them to improve their next year's application if they were not chosen this year.	0.00	4.50	0.00	4.50	\$393
Provide list of selected applicants to recognize to regions and senior management for approval.	0.50	0.50	0.00	1.00	\$110
Conduct compliance scans on school districts and reconcile any issues that may arise.	0.00	0.50	0.00	0.50	\$44
Send an announcement email to internal EPA staff about award winning applicants. Contact via phone all the applicants being recognized and set up phone meetings with those applicants not chosen to share consensus meeting feedback about strengths and areas of improvement of the application.	0.00	0.50	0.00	0.50	\$44
If there is an event for highlighting the award-winning school districts and invitational travel involved, convey logistics to selected applicants.	0.00	0.17	0.00	0.17	\$15
Using award winning applications create communications materials to showcase these award-winning programs. Initiate comprehensive outreach communications plan. If necessary, assist applicants with promoting their award using approved EPA messaging about the awards program and showcasing school IPM success stories.	0.50	1.00	0.00	1.50	\$153
Total per applicant	1.25	7.67	0.00	8.92	\$835
# of applicants/year (3-yr average over 2007-2009)	5			48	
Total annual cost					\$4,175

Burden hours are from the EPA OAR's Indoor Air Quality program.

Wages rates are from BLS for NAICS 999100 – Federal Government. May 2018 data.

In Table 10, the Agency cost per applicant (\$835) is estimated first and multiplied by the average annual total number of applicants (5) to obtain an estimate (\$4,175) of the total Agency cost for the *Connector* award. The per-applicant Agency cost is obtained by summing the products of wage rates (managerial, technical, and clerical) and the per-applicant burden hours for each labor type (1.25 hours of managerial labor, 7.67 hours of technical labor, and zero hours of clerical labor). Note that the total number of applications reviewed by the Agency includes those applications that are not chosen for award as well.

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

In this section, the total respondent and Agency burden hours and costs over all award types are summarized (Table 11).

Table 11: Total Annual Burden and Cost Summary

	Total burden hours	Total cost
Respondents	911	\$ 85,404
Great Start Award	90	\$ 8,828
Leadership Award	362	\$ 36,602
Excellence Award	248	\$ 21,807
Sustained Excellence Award	134	\$ 11,528
Connector Award	77	\$ 7,505
Agency	184	\$ 16,605
Great Start Award	7	\$ 700
Leadership Award	3	\$ 313
Excellence Award	85	\$ 7,905
Sustained Excellence Award	41	\$ 3,512
Connector Award	48	\$ 4,175

Source: Tables 1-10 in this document.

For the respondents across all categories of awards, the total annual cost of applying for the School IPM recognition program is estimated at 911burden hours and \$85,404. These costs consist of preparing, submitting, and recordkeeping of applications. For the EPA, the total cost of administering this recognition program is estimated at 184 hours and \$16,605 annually, most of which is the cost of reviewing the applications for awards (Table 11).

6(e) Bottom Line Burden Hours and Cost Tables

The costs associated with information collection increased for both the respondents and the Agency due to the increases in the wage rates since the creation of the ICR. We note that in the creation of the ICR, the benefits (46.3 percent of the unloaded wage) was mistakenly excluded from the calculation of the fully loaded wages for the Agency, resulting in the latter being much lower than the actual values. This led to the cost increase for the Agency disproportionately larger than the cost increase for the respondents.

6(f) Reasons for Change in Burden

The respondent burden for applying for the Excellence Award (Table 3) increased by 50 hours over the previous (2015) renewal cycle. This increase is due to the updates to the times to conduct some of the activities related to the application process: average time to compile and review; average time to complete and submit paperwork; and average time to store/maintain data. The updates were based on relevant comments received from the Katy Independent School District on the first FRN.

The current renewal estimates the respondent burden for applying to the Connector Award as 77 hours (Table 5) compared to 72 hours estimated in the 2015 renewal cycle. This difference is due to an error in estimating the 2015 estimate. In the 2015 renewal cycle, the 2009 value (single year value) of five applicants per year was used instead of the 3-year average value of 5.333 applicants per year by mistake, which resulted in the 5-hour difference in the total burden hours. In other words, this difference is spurious and there is actually no difference in the burden hours for the Connector Award application between the current and previous renewal cycles. For exactly same reason, there is a spurious difference of 3 hours in the total Agency burden between the current (184 hours) and 2015 renewal cycles (181 hours).

Thus, the change in total (the respondent and Agency combined) burden over the previous renewal cycle is an increase of 50 hours due to the changes in the respondent burden to apply for the Excellence Award as explained above.

6(g) Burden Statement

The annual respondent burden for this ICR is estimated to average 911 hours. This includes average times to carry out activities in Tables 1 – 5 in the section 6(b) above.

The Agency has established a public docket for this ICR under Docket ID No. EPA-HQ-OPP-2019-0356, which is available for online viewing at <http://www.regulations.gov>, or in person viewing at the EPA Docket Center Public Reading Room, EPA West Building, Room 3334, 1301 Constitution Avenue, NW, Washington, DC 20004. The EPA Docket Center is open from 8:30 a.m. to 4 p.m., Monday through Friday, excluding federal holidays. The docket telephone number is (202) 566-1744.

You may submit comments regarding 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. Submit your comments, referencing Docket ID No. EPA-HQ- OPP-2019-0356, to EPA as follows:

To EPA online using <http://www.regulations.gov> (our preferred method,) or by mail to: EPA Docket Center, Environmental Protection Agency Docket Center (EPA/DC), Mail Code 28221T, 1200 Pennsylvania Ave., NW., Washington, DC 20460

This address is for your comments - do not submit the information requested in this ICR to these addresses.

7. Attachments List: Supporting Statement (EPA-HQ-OPP-2019-0356)

All the attachments listed below can be found in the docket for this ICR or via the hyperlink provided for the source documentation. The docket is accessible electronically through <http://www.regulations.gov> using the docket identifier EPA-HQ-OPP-2019-0356.

ATTACHMENT A: 42 UCS 133 Pollution Prevention Act of 1990, available at <http://www.gpo.gov/fdsys/pkg/USCODE-2009-title42/pdf/USCODE-2009-title42-chap133.pdf>

ATTACHMENT B: 7 USC 136a, Registration of Pesticides, available at <http://www.gpo.gov/fdsys/pkg/USCODE-2010-title7/pdf/USCODE-2010-title7-chap6-subchapII-sec136a.pdf>

ATTACHMENT C: 7 USC 136r-1, Integrated Pest Management, available at <http://www.gpo.gov/fdsys/pkg/USCODE-2010-title7/pdf/USCODE-2010-title7-chap6-subchapII-sec136r-1.pdf>.

ATTACHMENT D: 2531.02 Consultation & Stakeholder Responses

ATTACHMENT E: SIPM Awards Program Conditions and Criteria
file:///C:/Users/csiu/Desktop/ICR/IPM%202019/2019%20Documents/2531.01_ss_Attachment%20G%20-%20Program%20Conditions%20and%20Criteria%20-%20SIPM.pdf

ATTACHMENT F: SIPM Awards Program Application Guide and Forms

ATTACHMENT G: Wage Rates Worksheet

ATTACHMENT H: Screenshots of draft Online SIPM Awards Program Applications