
Supporting Statement for the State Energy Program

Part A: Justification

OMB No. 1910-5126

DOE Form 540.6

June 2020

U.S. Department of Energy
Washington, DC 20585

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A.1. Legal Justification

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the information collection.

The Department of Energy (DOE) requires collection of information for the State Energy Program as included in the Energy Policy Conservation Act of 1975 (EPCA), the Energy Independence and Security Act of 2007 (EISA), SEP 2020 Administrative and Legal Requirements Document (ALRD), Program Year 2020 State Energy Program Grant Guidance 20-01, and the OMB requirements for grant and financial administration. DOE provides Federal financial assistance and technical support to States, five U.S. Territories, and the District of Columbia. Information gathered provides the current status of grants required to respond to OMB, Congressional and consumer requests, and budget preparation. In order to adequately monitor, report, and ensure transparency and accountability, the SEP requires quarterly reporting. In Fiscal Year 2020, SEP will disburse \$56 million to its grantees. This collection also includes quarterly status reporting for the 37 grantees with active financing programs funded under the American Recovery and Reinvestment Act (ARRA).

A.2. Needs and Uses of Data

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection

All SEP information is used by DOE to determine program outcomes and answer Congressional, budget, and public inquiries. Program staff utilize the information collected to track the recipients' activities, their progress in achieving scheduled milestones, and funds expended (including expenditure rates). It is also used to determine program compliance and set program goals and objectives as required in 10 CFR 420. The information is also used to align DOE recourses with grantee activities for the purpose of developing and aligning technical assistance and best practices. Below is the DOE form that the agency plans to use under this collection.

1. **SEP Quarterly Program Report (DOE F 540.6):** The SEP Quarterly Program Report (QPR) is designed to gather outcome and expenditure data to provide metrics showing how the grant recipient is implementing their respective DOE funded state plans. This information is used to track outcomes and to respond to Congressional and other inquiries regarding progress on grantees' SEP activities.

A.3. Use of Technology

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.

The DOE developed a web-based system called Performance and Accountability for Grants in Energy (PAGE), which allows DOE to administer the SEP grants online and provide all network users access to current program records. PAGE reduces data redundancy and paperwork and provides a single access point for providing all requested reporting. All Grantees have PAGE access and can enter quarterly reports directly into the system, and sign and submit them electronically to the DOE. Electronic submission of reports will result in greater efficiency, timely reporting and a reduced paperwork burden for grantees and DOE program staff. All records entered or updated are forwarded to a national database at DOE Headquarters.

A.4. Efforts to Identify Duplication

Describe efforts to identify duplication.

The SEP is a unique, flexible and diverse program that provides funding to states to promote the conservation of energy, reduce the rate of growth in energy demand and reduce the dependence on imported oil through the development and implementation of a comprehensive State Energy Program. The collection of the information has been standardized to capture information on financial expenditures and obligations, progress on project implementation, and estimated impacts. The information collected is unique to the DOE therefore this collection is not duplicative.

A.5. Provisions for Reducing Burden on Small Businesses

If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Small Businesses nor other small entities are impacted.

A.6. Consequences of Less-Frequent Reporting

Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The SEP requires quarterly reporting to effectively monitor performance of the grant. Annual reporting would not allow Project Officers to effectively determine if the grants' funds are being used in a timely, appropriate manner, and would prevent SEP leadership from effectively updating budgetary performance and future budgetary requirements to Congress and the Office of Management and Budget (OMB). The quarterly report form has been simplified and reduced to capture specific SEP information according to 10 CFR 420, and to minimize the burden to award recipients.

A.7. Compliance with 5 CFR 1320.5

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines. (a) requiring respondents to report information to the agency more often than quarterly; (b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; (c) requiring respondents to submit more than an original and two copies of any document; (d) requiring respondents to retain records, other than health, medical government contract, grant-in-aid, or tax records, for more than three years; (e) in connection with a

statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study; (f) requiring the use of statistical data classification that has not been reviewed and approved by OMB; (g) that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; (h) requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

The information collection is not being conducted in a manner inconsistent with OMB guidelines.

A.8. Summary of Consultations Outside of the Agency

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5CFR 320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken in response to the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside DOE to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or report.

The Department published a 60-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on November 4th, 2019, volume 84, number 213, and page numbers 59367 and 59368. No comments on the information collection were received.

The Department also published a 30-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on February 11th, 2020, volume 85, number 28 and page numbers 7758 and 7759. No comments on the information collection were received.

Pursuant to 5 CFR 1320.8(d)(1), DOE furthermore consulted with SEP grantees at trainings, conferences and other past events with regards to the amount of time it takes them to complete the required forms, the availability of data, the frequency of collection, the clarity of instructions, and the data elements to be reported. In addition, DOE provides national formal training forums every other year, on-site monitoring to state energy offices, webinars on relevant topics, and distributes SEP Program Notices so Grantees understand the forms and have the necessary information to fill them out.

A.9. Payments or Gifts to Respondents

Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payment or gift is being provided to the respondents.

A.10. Provisions for Protection of Information

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

There is no identifiable confidential information being requested. The information is collected at the state level, and individual identifiable information is not requested.

A.11. Justification for Sensitive Questions

Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why DOE considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No questions of a sensitive, personal or private nature are being asked.

A.12A. Estimate of Respondent Burden Hours

Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, DOE should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample fewer than 10 potential respondents is desirable.

All SEP grantees are required to report information about financial expenditures and the outcomes of expending SEP funds. In addition, SEP grantees who are managing financial programs funded with ARRA funds are still required to report on the financial status and outcomes of those programs as they have been deemed federal in perpetuity.

The Grantee's burden is calculated as follows.

SEP Annual Formula Grants w/o ARRA-Funded Financial Programs

(1) 19 grantees x 20 hours = 380 hours per quarter

(2) 380 hours x 4 quarterly periods = **1,520 hours annually**

SEP Annual Formula Grants w/ ARRA-Funded Financial Programs

(1) 37 grantees x 40 hours = 1,480 hours per quarter

(2) 1,480 hours x 4 quarterly periods = **5,920 hours annually**

Total SEP Annual SEP Reporting Burden by Year

(1) Year 1: **7,440 hours**

(2) Subsequent Years: **7,456 hours**

Total number of unduplicated respondents: **56**

Reports filed per person: **4 reports annually per applicant**

Total Annual responses: **224 reports annually**

Total annual burden hours: **7,456 hours**

The average burden estimated by hours per collection and applicant are below.

Per Collection: **33.3 hours**

Per Applicant: **133.1 hours (Annual total)**

Table A1. Estimated Respondent Hour Burden

Form Number/Title (and/or other Collection Instrument name)	Type of Respondents	Number of Respondents	Annual Number of Responses	Burden Hours Per Response	Annual Burden Hours	Annual Reporting Frequency
Quarterly Performance Report	State	56	224	33.3	7,456	4
TOTAL		56	224		7,456	

A.12B. Estimate of Annual Cost to Respondent for Burden Hours

Financial Personnel at the State level will fill out and submit the reports. The average hourly wage rate published by the U.S. Department of Labor for this personnel type is \$42.37.¹ DOE estimated the fully-burdened wage rate for ($\$42.37 * 1.6 = \67.79) by using data from the BLS news release USDL-19-1649, September 17, 2019 which imply a 1.6 multiplier for government employees (see <http://www.bls.gov/news.release/ecec.nr0.htm>). By multiplying this fully-burdened wage rate by the total annual burden hours that respondents will incur in, we calculate that the total respondent cost amounts to \$505,442.

Table A2. Estimated Respondent Cost Burden

Type of Respondents	Total Annual Burden Hours	Hourly Wage Rate	Total Respondent Costs
State	7,456	\$67.79 (1.6* \$42.37)	\$505,442
TOTAL	7,456		\$505,442

A.13. Other Estimated Annual Cost to Respondents

Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.

No additional costs to respondents.

¹ The Department of Labor's Bureau of Labor Statistics periodically updates the National Occupational Employment and Wage Estimates for the United States. Personal Financial Advisors at the State/Territory level fill out and submit this report. See U.S. Bureau of Labor Statistics, U.S. Department of Labor National Occupational Employment and Wage Estimates, https://www.bls.gov/oes/current/oes_nat.htm#13-0000_.

A.14. Annual Cost to the Federal Government

Provide estimates of annualized cost to the Federal government.

The estimated time required for DOE staff to review each response is 4 hours, for a total of 896 hours yearly.

Annual Cost to the Federal Government: 4 hours x \$116.45 (fully loaded hourly wage rate) x 224 (reports/yr.) = \$104,339.20

Table A3. Changes in Burden

EIA Form Number/Title	Annual Reporting Frequency	Number of Respondents (Previously Approved)	Number of Respondents (Requested)	Annual Number of Responses (Previously Approved)	Annual Number of Responses (Requested)	Burden Hours Per Response (Previously Approved)	Burden Hours Per Response (Requested)	Annual Burden Hours (Previously Approved)	Annual Burden Hours (Requested)	Annual Number of Responses			Annual Burden Hours		
										Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Adjustment	Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Adjustment
SEP Quarterly Performance Report	4	56	56	224	224	34.0	33.3	7,616	7,455	0		0	-161		-161
				0	0			0	0	0		0	0		0
				0	0			0	0	0		0	0		0
				0	0			0	0	0		0	0		0
				0	0			0	0	0		0	0		0
				0	0			0	0	0		0	0		0
TOTAL		56	56	224	224			7,616	7,455	0	0	0	-161	0	-161

A.15. Reasons for Changes in Burden

Explain the reasons for any program changes or adjustments reported in Items 13 (or 14) of OMB Form 83-I.

The changes in “Total Time Burden” due to adjustment in agency discretion is a result of two grantees who no longer have ARRA funded finance programs and are solely reporting on their annual formula funded grants.

Table A4. ICR Summary of Burden

	Requested	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Previously Approved
Total Number of Responses	224	0	0	224
Total Time Burden (Hr)	7,456	-161	0	7,616

A.16. Collection, Tabulation, and Publication Plans

For collections whose results will be published, outline the plans for tabulation and publication.

The information collected is not intended to be published at this time. No complex analytical techniques will be employed.

A.17. OMB Number and Expiration Date

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

DOE is not seeking approval to not display the expiration date for OMB approval of this information collection contained in this package.

A.18. Certification Statement

Explain each exception to the certification statement identified in Item 19 of OMB Form 83-I.

There are no exceptions to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions” of OMB form 83-I.