**Information Collection Request: CWA and SDWA Data Collection of Resource Needs for Utilities During the COVID-19 National Emergency (OMB Control Number 2040-0301; EPA ICR Number 2625.02)**

**Justification for No Material/Nonsubstantive Change**

The United States Environmental Protection Agency (EPA) requested an emergency information collection request (ICR) under the Clean Water Act (CWA) and the Safe Drinking Water Act (SDWA) that will enable us to rapidly obtain information from drinking water and wastewater systems (the water sector) to identify coronavirus disease (COVID-19) related obstacles and to ensure the water sector is prepared as the pandemic continues. As a result of COVID-19, the water sector is facing potential supply chain, workforce, financial, analytical support and cybersecurity impacts that could adversely affect a utility’s ability to maintain operations and compliance with SDWA and CWA requirements. The EPA needs to collect data quickly to assess whether water sector utilities have sufficient resources to continue their operations and provide safe drinking water and wastewater treatment during the COVID-19 pandemic. Ensuring that drinking water and wastewater services are fully operational is critical to combating COVID-19 and protecting Americans from other public health risks. The information collected will ensure that EPA and other key decision makers from the local to the federal level have an accurate understanding of operational and financial challenges and enable us to better tailor technical assistance that could be valuable to the water sector over the coming months.

EPA determined the most efficient way to collect the system information is to administer a voluntary on-line survey. In the interest of expediency, the collection instrument was not available at the time the initial emergency ICR was submitted. Therefore, EPA is updating the ICR to include the survey, which is consistent with OMB’s existing approval.

For those water sector utilities that do not have an email address or internet connection to access the survey instrument, a phone survey will be conducted and responses will be coded into the on-line software on behalf of the utility. Survey respondents will include community water systems (CWSs) and publicly owned treatment works (POTWs) of all sizes. The CWS and POTWs selected to participate in the survey were based on a statistically representative sample. Systems were divided into categories and a random sample was selected from each category. Categories include CWSs, POTWs, Alaska Native Villages, and American Indian utilities each stratified by population. A precision target of a 95 percent confidence interval plus or minus five percentage points was set for each category. This design builds the sample in such a way as to ensure that each category, as well as the national sample overall, will hit the prescribed precision target.