

**Supporting Statement for an Information Collection Request (ICR)  
Under the Paperwork Reduction Act (PRA)**

**EXECUTIVE SUMMARY**

**Identification of the Information Collection – Title and Numbers**

**Title:** Pesticide Environmental Stewardship Program Annual Measures Reporting

**ICR Numbers:** EPA ICR No.: 2415.04, OMB Control No.: 2070-0188

**Docket ID No.:** EPA-HQ-OPP-2020-0692

**Abstract**

This information collection request (ICR) is a renewal of an ICR that is currently approved by OMB, ICR No. 2415.03; OMB Control No. 2070-0188; entitled “the Pesticide Environmental Stewardship Program (PESP) (Renewal) <sup>1</sup>.”; approved through October 31, 2021.

The program uses the information collected to establish partner membership, develop stewardship strategies, measure progress towards stewardship goals, and award incentives. PESP is an EPA partnership program that encourages the use of integrated pest management (IPM) strategies to reduce pests and pesticide risks. IPM is an approach that involves making the best choices from among a series of pest management practices that are both economical and pose the least possible hazard to people, property, and the environment.

PESP members include pesticide end-users and organizations which focus on training, educating, and/or influencing pesticide users. To become a PESP member, an organization submits an application and a five-year strategy outlining how environmental and human health risk reduction goals will be achieved through IPM implementation and/or education. The program encourages PESP members to track progress towards IPM goals such as: reductions in unnecessary use of pesticides, cost reductions, and knowledge shared about IPM methodologies. Entities participating in PESP also benefit from technical assistance, and through incentives for achievements at different levels.

The incentive structure of PESP is dependent upon members’ demonstration of successful IPM implementation resulting in desired environmental outcomes. For example, members may qualify to advance to one of three progressively higher membership tiers (bronze, silver, and gold) based on sustained reduction of pesticide risks and an independent measure of IPM implementation.<sup>2</sup> The data needed to qualify is collected through the annual PESP reports that members submit to EPA. In addition, annual progress reports (also referred to as ‘surveys’ in the program) enable EPA and PESP members to track and measure the progress being made by

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<sup>1</sup> The Pesticide Environmental Stewardship Program website can be found at <http://www.epa.gov/pestp>

<sup>2</sup> PESP Member Performance Measures website details how members can receive recognition for their achievements by qualifying for Bronze, Silver, and Gold tiers: <https://www.epa.gov/pestp/membership-eligibility-and-performance-measures-pestp#performance>

adopting IPM activities resulting in reductions in risks to human health and the environment. **Attachment A** is a flow chart that demonstrates PESP membership level advancement process.

## **SUPPORTING STATEMENT**

### **1. Explain the circumstances that make the collection of information necessary.**

PESP is EPA's non-regulatory approach to meeting the goals of the Pollution Prevention Act (PPA), the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and the Food Quality Protection Act (FQPA) to reduce pesticide risks in agricultural and non-agricultural settings. Section 2(b) of the PPA of 1990, 42 U.S.C. 13101(b), sets forth "the national policy of the United States that pollution should be prevented or reduced at the source whenever feasible." Section 3 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 4(b) of the Act directs the Administrator of EPA to, among other things, "facilitate the adoption of source reduction techniques by business" (**Attachment B-1**).

Section 3 of FIFRA requires EPA to regulate pesticides to prevent "unreasonable adverse effects" on human health and the environment (**Attachment B-2**). IPM strategies, such as decreasing pesticide use and targeted pesticide treatment, reduce the likelihood of pesticides causing unreasonable adverse effects. 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 B-3**).

EPA collects information about PESP member accomplishments and measures to fairly and accurately assess program effectiveness and award benefits. Completed PESP applications, including contact information, are preliminary to EPA's formal acceptance of members. Annual progress reports allow EPA to understand and assist each member's efforts. In addition, such reports track and measure individual and overall program progress in adopting IPM, and the resulting reductions in risks to human health and the environment.

### **2. 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.**

The information collected by PESP is not designed or intended to support EPA regulatory decision-making. EPA intends to use the information collected in PESP Membership Application and the Strategy/Reporting Form to:

- (1) Identify the member's commitment to promoting and implementing IPM practices;
- (2) Verify the member's involvement in promoting and implementing IPM practices;
- (3) Measure environmental outcomes resulting from the member's activities toward promotion and implementation of IPM, and

(4) Determine the member's eligibility for award or recognition under PESP.

In addition, to the extent possible, EPA will analyze the data to look for environmental trends and highlight program successes by posting information on PESP website (<http://www.epa.gov/pesp>).

**3. 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.**

Prospective members will be able to obtain PESP Membership Application and PESP Strategy/Progress Reporting Forms online located at: <https://www.epa.gov/pestp/pestp-application-form>. In collecting and analyzing the information associated with this ICR, EPA will use a telephone system, personal computers, and applicable database software.

All forms were designed to have a minimum burden on the user. The technology in PESP Strategy/Progress Reporting Forms provides users with the option of partially completing a form, saving the unfinished form, then returning later to complete the form. Once complete, the form is submitted online. Upon submission, the measurement data are transmitted into an EPA-managed Customer Relationship Management system. This technology can aggregate measures and display data in a variety of graphical and tabular forms. The Agency will leverage this data and technology to achieve the following key goals:

1. Develop case studies to demonstrate the economic value of implementing IPM.
2. Reduce burden on members who are promoting IPM to users and collecting IPM implementation data (especially those collecting data on pesticide usage). EPA maintains a list of registered products. To analyze the pesticide usage one must have the capacity to assess a constantly changing list of registered pesticides for a particular industry. It is easier for EPA to provide this service because the Agency already maintains this information.
3. Provide growers and grower associations with informational resources on effective IPM techniques and safe pesticide usage (IPM best practices such as pest identification, threshold setting, prevention and control).
4. Prevent access to and distribution of business information reported by PESP members. Data will only be shared publicly in aggregate form unless otherwise specified and agreed to by the affected PESP member(s).

**4. Describe efforts to identify duplication.**

Respondents 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. The information collected by PESP is unique and is not duplicative of previous ICRs. EPA consulted with trade associations and potential partners to confirm that the information being collected by PESP does not exist elsewhere.

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

EPA expects that many of the members in PESP will be small entities. The Agency has designed its forms to minimize respondent burden while obtaining sufficient and accurate information. PESP is a flexible program, particularly with regard to each member's strategy. Although a comprehensive strategy outline is provided to prospective members, not all of the points in this outline will apply to every prospective member. For example, prospective members who are primarily educational organizations would not complete the portion of the Strategy/Progress Reporting Form having to do with pesticide use. Likewise, some members will elect to not address every point in PESP strategy outline due to a lack of resources to collect the necessary information. For these reasons, EPA will review members' annual progress reports, making allowances on a case-by-case basis for the inapplicability of certain elements and the members' abilities to provide the information. Since participation in PESP is voluntary, members may also elect to withdraw from the program at any time if they do not wish to submit the annual reporting data needed to maintain membership in the voluntary program and assess eligibility for membership tier.

**6. 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.**

EPA requests that PESP members each submit an annual progress report on certain environmental performance measures. EPA estimates that it will take the Agency one year to develop a good understanding of each member's progress over time. The Agency also believes that less frequent reporting would place a greater burden on members. This is because PESP members would then have to track their pesticide usage and other data over a longer period of time and compile a larger overall report to EPA. It would also delay recognition of members' accomplishments, potentially excluding them from qualifying for participation in PESP.

**7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.**

The information collection activities discussed in this ICR comply with all regulatory guidelines under 5 CFR 1320.5(d)(2). PESP progress reports will be submitted annually. PESP members will not need to retain records for this program for more than one year.

**8. If applicable, provide a copy and identify the date and page number of publications in the Federal Register of the agency's notice, required by 5 CFR 1320.8(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 EPA 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.**

In addition to the public notice that EPA published in the Federal Register on March 31, 2021 (86 FR 16720), concerning the proposal to renew this ICR, the Agency consulted with stakeholders who actively interact with the Agency through the use of this data collection. There were no public comments received and the Agency contacted four relevant stakeholders and received a response from one.

The following stakeholders were contacted:

- 1) University of Wisconsin Center for Integrated Agricultural Systems
- 2) The Buzz Fuzz
- 3) Mosquito Squad of Cincinnati and Northern Kentucky
- 4) Cape Cod Mosquito Control on behalf of the American Mosquito Control Association  
**(Responded)**

The response submitted to the Agency by the stakeholder provided a minor contrast of burden between the currently approved information collection and the stakeholder's calculation. The Agency has determined that the minor difference does not require any further changes to the burden of the currently proposed information collection. An overview of the consultation response is provided in **Attachment C**.

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

This question is not applicable to this Information Collection Request renewal.

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

EPA has implemented procedures to protect any confidential, trade secret or proprietary information from disclosure by providing strict instructions regarding access to confidential business information (CBI). These procedures comply with EPA's CBI regulations at 40 CFR Part 2, Subpart B.

**11. 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 information collection activity complies with the provisions of the Privacy Act of 1974 and OMB Circular A-108. 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. PESP data sharing activities protect an organization's data by presenting them in a general and unidentifiable manner.

**12. Provide estimates of the hour burden of the collection of information.**

A prospective member completes two forms:

1. The PESP Membership Application Form (EPA Form 9600-02, **Attachment D**), and
2. A list of one of the IPM measures that the member has selected to commit to and track over time using one of the following two PESP Strategy/Progress Reporting forms, as applicable:
  - Non-commercial or residential pest control service providers use the Strategy/Progress Reporting Form for PESP Members that are Not Commercial/Residential Pest Control Services (EPA Form No. 9600-01, **Attachment F**);
  - Commercial/Residential Pest Control companies use the Strategy/Progress Reporting Form for Residential/Commercial Pest Control Service Providers (EPA Form No. 9600-03, **Attachment G**).

PESP Strategy/Progress Reporting Forms are multi-purposed. Members use whichever form applies to them (either **Attachment F or G**) for submitting their initial PESP member strategy, the annual IPM performance report, or the five-year IPM strategy update.

By January 1st of each year, each member reports on a common set of measures to document progress towards their goals. The set of measures any member reports on is determined by the program category into which the member belongs (Live, Work, Play, or Farm) and whether the member is a commercial/residential pest control company. The PESP strategy process is intended to keep all members and EPA focused on the goal of pesticide risk reduction. Only those members who submit annual PESP Strategy/Progress Reporting Forms will be eligible for PESP Champion awards.

(i) Data Items

The following data items may be reported:

- Organization name

- Name, title, address, phone number, and email address of primary and secondary contacts
- Member group for which the candidate is applying (Live, Work, Play, or Farm)
- Type of organization (e.g. grower, pest management professional, promotional organization)
- If a membership organization, such as a trade association, the approximate number of members
- PESP strategy, which is a description of actions taken to qualify for membership, as well as selection of the IPM measures on which the candidate plans to report
- Annual report of progress with regard to certain measures of IPM implementation such as pesticide use and risk reduction, and organizational profile

(ii) Respondent Activities

Candidates conduct the following activities to apply for PESP membership:

- Review PESP material, including criteria for membership tiers (Member Handbook<sup>3</sup>, PESP website)
- Select a primary and secondary contact person for the program
- Complete PESP Membership Application, including affirming the endorsement of a company authority (e.g., CEO or vice president for health and environment)
- Complete the member's strategy in PESP Strategy/Progress Reporting form describing actions taken to qualify for membership, as well as a selection of the IPM measures which are anticipated for a span of five years, and on which the applicant plans to report
- Submit completed form to EPA through PESP Website or by mail or e-mail

Candidates must conduct the following activities to continue PESP membership, to advance in membership levels, to pass mandatory Agency environmental and criminal compliance screening, and to qualify for awards:

1) Submission of Annual Survey (Reporting):

- Provide an annual progress report on the selected IPM measures using the appropriate PESP Strategy/Progress Reporting Form
- Upon request, provide relevant documentation to EPA

2) Strategy Update:

- Every five years submit an updated IPM strategy reflecting the organization's current business practices and IPM strategy. The Agency does not require special or additional standards with strategy updates to continue participating in PESP program. However, to receive incentives and awards, a PESP member may need to sustain their own performance and stay competitive with pesticide environmental stewardship achievements.

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<sup>3</sup> Pesticide Environmental Stewardship Program: Member Handbook (April, 2011)  
<https://www.epa.gov/sites/production/files/2016-01/documents/pesp-handbook.pdf>

The PESP participation paperwork burden consists primarily of the administrative activities associated with filling in and submitting a Membership Application, preparing and submitting a strategy (using the PESP Strategy/Progress Reporting Form), as well as preparing and submitting an annual progress report (using the PESP Strategy/Progress Reporting Form). Only new members fill out and submit the Membership Application; this is a one-time activity. All members prepare and submit annual progress reports using PESP Strategy/Progress Reporting Form. Each member's IPM strategy is updated once every five years.

Burden estimates were prepared for the average time necessary to perform each activity for each member category. For internal purposes, member categories are IPM promoters, IPM users, and national IPM users. An example of an IPM promoter would be a trade or research organization. IPM users are those PESP members that would have their pesticide use records centrally located, and national IPM users are those PESP members that would have their pesticide use records spread across several company sites, regionally and/or nationally, and thus have a larger burden associated with annual reporting. Burden estimates are based on interviews conducted with current PESP members and Agency experience interacting with PESP members.

As shown in Tables 2 through 4, EPA estimates the paperwork burden to prepare and submit the five-year strategy (using the applicable PESP Strategy/Progress Reporting Form) to be 10 managerial hours; the burden to prepare and submit PESP Membership Application for all members is estimated to be 2 managerial hours.

The burden hours for the annual progress report, however, vary by type of member. This activity also represents the majority of burden hours for all types of members. The total annual burden hours to prepare and submit the annual progress report (or annual survey) for both current and joining members are 25, 100, and 300 for IPM promoters, IPM users, and national IPM users respectively, as shown in Table 1 below. In the first year, these hours are used to plan, prepare, and setup to submit the annual PESP surveys. For subsequent years, the paperwork burden estimates are to prepare and submit the annual survey.

**Table 1:** Total Burden Hours for Submitting Annual PESP Surveys

|                    | Management<br>20% | Technical<br>70% | Clerical<br>10% | Total<br>Hours |
|--------------------|-------------------|------------------|-----------------|----------------|
| IPM Promoters      | 5                 | 17.5             | 2.5             | 25             |
| IPM Users          | 20                | 70               | 10              | 100            |
| National IPM Users | 60                | 210              | 30              | 300            |

As shown below in Table 5, EPA estimates that an average of 461 entities will participate in PESP per year during the next three-year ICR period. This estimate is based on the current number of existing members and the average number of new members joining during the last three years. As of October 2020, PESP had 425 existing members. On average, 12 new members joined each year during the previous three years in all membership categories, combined. The number 461 is based on the assumption that each year, for the next three years, 12 new members will join for a total of 36 new members over the 3-year period. Based on existing PESP data, 97 members are IPM



promoters, 272 are IPM users, and 56 are national IPM users. EPA estimates an average of 50,093 annual hours for all members at a cost of \$3.5 million per year.

Consistent with recent ICR renewals, OPP 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 methodology uses data on 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). Fully loaded wage rates are used to calculate respondent costs.

**Unloaded Wage Rate:** Wages are estimated for occupations (management, technical, and clerical) within applicable sectors. The Agency updated this final version of the ICR using the average wage data for 2019 (published in May 2020). This data is available 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. 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](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 IPM promoters and National IPM users. For IPM users the technical rate is based on first-line supervisors/managers of landscaping, lawn service, and grounds keeping workers.

**Loaded Wage Rate:** Benefits represent 46% of unloaded wage rates, based on 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 2019 data and to derive the fully loaded rates and overhead costs for this new ICR are listed in **Attachment G. Tables 2, 3, and 4** below provide member burden and cost estimates by activity for IPM promoters, IPM users, and national IPM users, respectively.

**Table 2:** Average Annual Burden and Cost Estimates for IPM Promoters

| Collection Activities<br>per Promoter | Burden Hours |           |          | Total |       |
|---------------------------------------|--------------|-----------|----------|-------|-------|
|                                       | Management   | Technical | Clerical | Hours | Costs |

|  | \$160.73<br>per hour  | \$82.48<br>per hour   | \$46.23<br>per hour |                      |            |
|--|-----------------------|-----------------------|---------------------|----------------------|------------|
| <b>Activities for current participants</b>       |                       |                       |                     |                      |            |
| Prepare and submit PESP strategy                 | 2                     | 0                     | 0                   | 2                    | \$312      |
| Prepare and submit PESP annual Survey            | 5                     | 17.5                  | 2.5                 | 25                   | \$2,363    |
| TOTAL BURDEN                                     | 7                     | 17.5                  | 2.5                 | 27                   | \$2,2,684  |
| <b>Activities for new participants</b>           |                       |                       |                     |                      |            |
| Fill out and submit application form             | 2                     | 0                     | 0                   | 2                    | \$321      |
| Prepare and submit PESP strategy                 | 10                    | 0                     | 0                   | 10                   | \$1,607    |
| Plan, prepare, and setup for annual PESP surveys | 5                     | 17.5                  | 2.5                 | 25                   | \$2,363    |
| TOTAL BURDEN                                     | 17                    | 17.5                  | 2.5                 | 37                   | \$4,291    |
| Current participants                             | 97                    |                       |                     |                      |            |
| Participants joining per year                    | 1                     |                       |                     |                      |            |
| <b>All Promoters</b>                             | Existing participants | Hours per participant | Total hours         | Cost per participant | Total cost |
| Current participants - 3 years average           | 98                    | 27                    | 2,646               | \$2,684              | \$263,041  |
| New participants per year                        | 1                     | 37                    | 37                  | \$4,291              | \$4,291    |
| Total - 3 year average                           | 99                    |                       | 2,683               |                      | \$276,332  |

\*Estimates may not add due to rounding

Data Source: BLS [http://www.bls.gov/oes/current/naics4\\_541600.htm](http://www.bls.gov/oes/current/naics4_541600.htm),

May 2019 data wage rate source: BLS for NAICS 541600 - Management, Scientific, and Technical Consulting Services. Only new members fill out and submit a PESP Membership Application.

2. All members prepare and submit a PESP strategy once every five years. For current members: 10 hours per strategy / 5 years = 2 hours per year.

3. New members plan, prepare, and setup for PESP survey during the first year. After the first year, current members submit the annual PESP survey each year.

**Table 3: Average Annual Burden and Cost Estimates for IPM Users**

| Collection Activities<br>per IPM User            | Burden Hours         |                     |                     | Total |         |
|--|----------------------|---------------------|---------------------|-------|---------|
|  | Management           | 1st Line Supervisor | Clerical            | Hours | Costs   |
|  | \$104.29<br>per hour | \$55.69<br>per hour | \$37.74<br>per hour |       |         |
| <b>Activities for current participants</b>       |                      |                     |                     |       |         |
| Prepare and submit PESP strategy                 | 2                    | 0                   | 0                   | 2     | \$209   |
| Prepare and submit PESP annual Survey            | 20                   | 70                  | 10                  | 100   | \$6,362 |
| TOTAL BURDEN                                     | 22                   | 70                  | 10                  | 102   | \$6,570 |
| <b>Activities for new participants</b>           |                      |                     |                     |       |         |
| Fill out and submit application form             | 2                    | 0                   | 0                   | 2     | \$209   |
| Prepare and submit PESP strategy                 | 10                   | 0                   | 0                   | 10    | \$1,043 |
| Plan, prepare, and setup for annual PESP surveys | 20                   | 70                  | 10                  | 100   | \$6,362 |
| TOTAL BURDEN                                     | 32                   | 70                  | 10                  | 112   | \$7,613 |
| Current participants                             | 272                  |                     |                     |       |         |
| Participants joining per year                    | 10                   |                     |                     |       |         |

| All IPM Users                          | Existing participants | Hours per participant | Total hours | Cost per participant | Total cost  |
|--|-----------------------|-----------------------|-------------|----------------------|-------------|
| Current participants - 3 years average | 282                   | 102                   | 28,764      | \$6,570              | \$1,852,852 |
| New participants per year              | 10                    | 112                   | 1,120       | \$7,613              | \$76,133    |
| Total – 3-year average                 | 292                   |                       | 29,884      |                      | \$1,928,985 |

\*Estimates may not add due to rounding

Data Source: BLS [http://www.bls.gov/oes/current/naics5\\_561710.htm](http://www.bls.gov/oes/current/naics5_561710.htm), May 2019 data

Wage rate source: BLS for NAICS 561710 - Exterminating and Pest Control Services.

1. Only new members fill out and submit a PESP Membership Application.

2. All members prepare and submit PESP strategy once every five years. For current members: 10 hours per strategy / 5 years = 2 hours per year.

3. New members plan, prepare, and setup for PESP survey during the first year. After the first year, current members submit the annual PESP survey.

**Table 4: Average Annual Burden and Cost Estimates for National IPM Users.**

| Collection Activities<br>per National IPM User   | Burden Hours          |                       |             | Total                |                 |
|--|-----------------------|-----------------------|-------------|----------------------|-----------------|
|  | Management            | Technical             | Clerical    | Hours                | Costs           |
|  | \$128.21              | \$63.14               | \$42.44     |                      |                 |
|  | per hour              | per hour              | per hour    |                      |                 |
| <b>Activities for current participants</b>       |                       |                       |             |                      |                 |
| Prepare and submit PESP strategy                 | 2                     | 0                     | 0           | 2                    | \$256           |
| Prepare and submit PESP annual Survey            | 60                    | 210                   | 30          | 300                  | \$22,225        |
| <b>TOTAL BURDEN</b>                              | <b>62</b>             | <b>210</b>            | <b>30</b>   | <b>302</b>           | <b>\$22,482</b> |
| <b>Activities for new participants</b>           |                       |                       |             |                      |                 |
| Fill out and submit application form             | 2                     | 0                     | 0           | 2                    | \$256           |
| Prepare and submit PESP strategy                 | 10                    | 0                     | 0           | 10                   | \$1,282         |
| Plan, prepare, and setup for annual PESP surveys | 60                    | 210                   | 30          | 300                  | \$22,225        |
| <b>TOTAL BURDEN</b>                              | <b>72</b>             | <b>210</b>            | <b>30</b>   | <b>312</b>           | <b>\$23,764</b> |
| Current participants                             | 56                    |                       |             |                      |                 |
| Participants joining per year                    | 1                     |                       |             |                      |                 |
| All National IPM Users                           | Existing participants | Hours per participant | Total hours | Cost per participant | Total cost      |
| Current participants - 3 years average           | 57                    | 302                   | 17,214      | \$22,482             | \$1,281,463     |
| New participants per year                        | 1                     | 312                   | 312         | \$23,764             | \$23,764        |
| Total - 3 years average                          | 58                    |                       | 17,526      |                      | \$1,305,227     |

\*Estimates may not add due to rounding

Data Source: BLS: [http://www.bls.gov/oes/current/naics3\\_311000.htm](http://www.bls.gov/oes/current/naics3_311000.htm), May 2019 data

Wage rate source: BLS for NAICS 311000 - Food Manufacturing.

1. Only new members fill out and submit a PESP Membership Application.

2. All members prepare and submit PESP strategy once every five years. For current members: 10 hours per strategy / 5 years = 2 hours per year.

3. New members plan, prepare, and setup for PESP survey during the first year. After the first year current members submit the annual PESP survey.

Table 5 summarizes the number of members and the average annual burden and cost over a three-year period for both existing and new members.

**Table 5: Three-year Average Total Annual Burden Hours and Cost for all Members**

|                    | <b>Members</b> | <b>Total hours</b> | <b>Total cost</b> |
|--------------------|----------------|--------------------|-------------------|
| IPM Promoters      | 97             | 2,683              | \$267,332         |
| IPM Users          | 272            | 29,884             | \$1,928,985       |
| National IPM Users | 56             | 17,526             | \$1,305,227       |
| Annual New Members | 12             | 1,469              | \$104,018         |
| All Members        | 425            | 51,562             | \$3,605,562       |

**13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information.**

There are no operational and/or maintenance costs.

**14. Provide estimates of annualized cost to the Federal government.**

For this ICR, the Agency is using internal data from OPP Divisions that provide significant support and analysis for PESP. These data are taken from the Time and Attendance Information System (TAIS) and PeoplePlus, which archives the Agency's Full Time Equivalents (FTEs) for most OPP program activities. The ICR contains appropriate FTE activity data from the Antimicrobials Division (AD), Biological and Economic Analysis Division (BEAD), Biopesticide and Pollution Prevention Division (BPPD), Environmental Fate and Effects Division (EFED), Health Effects Division (HED), Registration Division (RD), and the Pesticide Reevaluation Division (PRD). The Agency believes that using data from the TAIS reflects internal operations for implementing and administering PESP activities.

Table 6 shows the FTEs by division and type of labor and summarizes the total burden hours and cost.

**Table 6: Average Annual Agency Burden and Cost**

| Division     | FTEs (full time equivalent person years) |             |             |             |             |             |             |             | Total burden hours | Wage per hour | Total Cost \$1000s |
|--------------|--|-------------|-------------|-------------|-------------|-------------|-------------|-------------|--------------------|---------------|--------------------|
|              | BEAD                                     | RD          | EFED        | PRD         | HED         | AD          | BPPD        | Total       |                    |               |                    |
| Managerial   | 0.00                                     | 0.00        | 0.00        | 0.00        | 0.00        | 0.00        | 0.11        | <b>0.11</b> | 235                | \$132.92      | \$31               |
| Technical    | 0.01                                     | 0.00        | 0.00        | 0.01        | 0.00        | 0.00        | 1.00        | <b>1.02</b> | 2,122              | \$93.50       | \$198              |
| Clerical     | 0.00                                     | 0.00        | 0.00        | 0.00        | 0.00        | 0.00        | 0.04        | <b>0.04</b> | 93                 | \$49.06       | \$5                |
| <b>Total</b> | <b>0.01</b>                              | <b>0.00</b> | <b>0.00</b> | <b>0.01</b> | <b>0.00</b> | <b>0.00</b> | <b>1.15</b> | <b>1.18</b> | <b>2,450</b>       |               | <b>\$234</b>       |

Annual Agency burden hours, 2,450, were calculated by multiplying the number of hours per FTE (2,080) by the number of FTE's (1.18). The annual Agency costs, \$234,000, were calculated

by multiplying the burden hours for each type of labor by their loaded wage rates and summing the costs for all types of labor.

To determine Agency costs, the Agency used the Bureau of Labor Statistics estimates of labor rates for 2019 for the NAICS code for the Federal Executive Branch (NAICS 999100). The managerial labor rate is based on the SOC (Standard Occupational Classification) 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.

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

There is an increase of 3,897 hours in the total estimated respondent burden compared with that identified in the ICR currently approved by OMB. This increase reflects EPA's updating of burden estimates for this collection based upon historical information on the number of PESP members. Members are classified as IMP Promoters, IPM Users, and National IMP Users. Based on revised estimates, the number of IPM Promoters has decreased, while the number of IPM users has increased, and the number of National IPM users has decreased since the last ICR renewal. Although the estimated burden per response has not changed for any category, the shift in membership types has resulted in a net increase in the overall burden.

There is a decrease of 11,267 hours in the total estimated agency burden compared with that identified in the ICR currently approved by OMB. The decrease in agency burden hours reflects the reduced processing time associated with the online version of the IPM forms.

In addition, OMB has requested that EPA move towards using the 18-question format for ICR Supporting Statements used by other federal agencies and departments and is based on the submission instructions established by OMB in 1995, replacing the alternate format developed by EPA and OMB prior to 1995.

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

Organizations may submit the one-time PESP Application Form and PESP strategy package at any time. The progress reports are due to the Agency by October 1st of each year.

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

This question not applicable to this ICR.

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

EPA does not request an exception to the certification of this information collection.

**SUPPLEMENTAL INFORMATION**

The annual public burden for this collection of information is estimated to average approximately 109 hours annually per respondent over the three-year period. According to the Paperwork Reduction Act, “burden” means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. For this collection it includes the time needed to review and understand instructions; prepare and submit reports (including searching data sources); complete and review the collection of information; transmit the information; and keep records.

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 Number EPA-HQ-OPP-2020-0692, which is available at <http://www.regulations.gov>. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the Docket ID Number identified above.

You can also provide comments to the Office of Information and Regulatory Affairs, Office of Management and Budget via <http://www.reginfo.gov/public/do/PRAMain>. Find this particular information collection by selecting “Currently under 30-day Review—Open for Public Comments” or by using the search function.

All comments received by EPA will be included in the docket without change, including any personal information provided, unless the comment includes profanity, threats, information claimed to be Confidential Business Information (CBI), or other information whose disclosure is restricted by statute. Do not submit electronically any information you consider to be CBI or other information whose disclosure is restricted by statute.

**LIST OF ATTACHMENTS**

All of the attachments listed below can be found in the docket for this ICR or using the hyperlink provided. The docket for the action is accessible electronically through <http://www.regulations.gov> using the docket identifier EPA-HQ-OPP-2020-0692.

ATTACHMENT A: PESP Membership Levels Flow Chart

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ATTACHMENT B-1: 42 USC 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-2: 7 USC 136a\_Registration of Pesticides

ATTACHMENT B-3: USC 136r-1, The Food Quality Protection Act, available at <http://www.gpo.gov/fdsys/pkg/USCODE-2010-title7/pdf/USCODE-2010-title7-chap6-subchapII-sec136r-1.pdf>.

ATTACHMENT C: Consultation Summary

ATTACHMENT D: PESP Membership Application (EPA Form No. 9600-02)

ATTACHMENT E: Strategy/Reporting Form for PESP Members that are Not Commercial/Residential Pest Control Services (EPA Form No. 9600-01).

ATTACHMENT F: PESP Strategy/Progress Reporting Form for Residential/Commercial Pest Control Service Providers (EPA Form No. 9600-03)

ATTACHMENT G: Worksheets Used to Calculate Labor Costs for IPM Promoters, IPM Users, National IPM Users, and EPA