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# Supporting Statement for Energy Efficiency and Conservation Block Grant Information Collection Request

## **Part A: Justification**

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*Collection Instruments for each recipient are one Annual Report for each financing program, Historic Preservation Act and Davis Bacon Act reports*

**OMB No. 1910-5150**

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9/30/2021

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.**

DOE requires the collection of information for the *EECBG*, as set forth in Funding Opportunity Announcement DE-FOA-0000013 (Attachment C), the Energy Independence and Security Act of 2007 (EISA) (P.L. 110-140). This collection also meets OMB requirements for: (1) administration of American Recovery and Reinvestment Act of 2009 (ARRA or Recovery Act) (Pub. L. No. 111-5) Financing programs created as part of the *EECBG* formula and competitive grants; and (2) ARRA funds. The *EECBG* is authorized under the Energy Policy and Conservation Act (EPCA), as amended (42 U.S.C. § 6321 *et seq.*).

DOE provides Federal financial assistance and technical support to state, local, and tribal governments under the EISA. Information gathered under this IC provides current data required to respond to OMB, congressional and consumer requests, and for budget preparation.

As part of ARRA funds starting in 2009, the *EECBG* program was allocated \$3.2 billion, \$2.7 billion of which was apportioned to 3,200 grants to states, territories, tribes, and units of local government through a distribution formula based on population. These funds were intended to help expand local energy efficiency efforts and reduce energy use in the transportation, building, and other appropriate sectors. Grant recipients were allowed to select activities from a list of approved activities, one of which was development of financing programs. While all grants under the *EECBG* program have been retired, the revolving loan activities will continue until the funds have been fully exhausted or the grantee decides to re-purpose the funds to other energy efficiency projects. The funds remaining in financing programs retain their federal character and continue to require reporting and oversight by federal regulations. The same grantees report on their programs each year, unless they exhaust their federal funds and are no longer required to report.

## 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**

When the ARRA grants retired, the recipients continued to manage their financing programs which continued to provide funds for energy efficiency financing purposes. A grants manager or other staff member of the recipient provides information annually on the use of funds, performance and status of the financing programs. The information collected is used by DOE program staff to track the recipients' activities, monitor their progress, and provide oversight for financing program expenditures and the repurposing of funds. The collected information also enables program staff to provide required or requested information on program activities to OMB, Congress, and the public. This is an important component to demonstrating the impact and success of the *EECBG* formula Financing programs.

## 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.**

All *EECBG* Financing programs created in either formula or competitive grants are administered by the Weatherization and Intergovernmental Office (*WIP*) and report through the *Performance and Accountability for Grants in Energy (PAGE)* online database. *PAGE* provides all *EECBG* recipients with the ability to electronically submit and manage financing program performance and repurposing information. This online system allows DOE to administer the *EECBG* financing programs and provides all network users with access to current program records. *PAGE* reduces data redundancy and paperwork, offering universal and complementary data collection via electronic forms that enable program-wide data mining and analysis. The *PAGE* electronic reporting system also prevents data redundancy by allowing information to be transposed into multiple fields without having to be re-entered. It ensures accurate calculations, since they are performed automatically by the system, therefore reducing user error and time.

*PAGE* sends reminders of reporting due dates when users sign-in to the system. *PAGE* automatically terminates reminders and changes program counts as users retire their financing programs.

#### **A.4. Efforts to Identify Duplication**

**Describe efforts to identify duplication.**

The information collected by DOE from the *EECBG* Financing programs is specific to the use of funds in revolving loan, loan loss reserve, and interest rate buy-down programs. The information collected is for the management of the Financing programs and is not duplicated by other agencies or programs. General and broad questions are avoided to prevent crossovers between this and other programs.

#### **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 are not impacted by these requirements. Only local and state governments and tribal entities are subject to the reporting requirements. The web-based system, utilized since 2014, has not posed a problem for state and local governments, or tribal entities. DOE has provided technical assistance to all Financing program managers. The *EECBG* Finance program manager also conducts one-on-one phone calls with Financing program participants on an as-needed basis.

#### **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.**

All programs funded through ARRA were subject to increased attention and scrutiny from OMB, Congress, the General Accountability Office (GAO), the DOE Office of the Inspector General (OIG), the media, and the public. If this information is not collected, DOE will be unable to provide substantive reports to DOE management, or respond to requests for information on loan performance, repurposed activities, and expenditures. Annual reporting creates accountability for Financing program managers to highlight problems, barriers, risks, and successful implementation to ensure successful stewardship of the *EECBG* loan programs. Annual reporting facilitates DOE's ability to monitor conformance of the management of Federal funds with financing program guidance. If this information collection is not conducted, DOE's ability to oversee the *EECBG* loan programs will be restricted, including the capacity to provide relevant information to stakeholder constituents. Furthermore, DOE will be unable to scrutinize the loan programs for potential waste, fraud, or abuse of Federal funds.

## **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 product 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 stature of 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; or**
- (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.**

There are no special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines. The information collection is being conducted in a manner that is consistent with OMB guidelines. The latest information collection was completed in October, 2020, within the deadline of November 30, 2020. The next collection is due to be conducted in October, 2021.

## **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.**

DOE corresponds directly with all EECBG Financing program managers via email and also through the online reporting tool that provides comment and response capability for DOE and the recipient. DOE published a 60-day *Federal Register Notice* and Request for Comments concerning this collection in the

*Federal Register* on June 7, 2021(Vol. 86; No. 107; Page 30311). No comments were received to the 60-day notice. The 30-day notice is pending.

### **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 has been, or will be, provided to 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.**

No identifiable confidential information is requested, simply the number of and the dollar amounts of loans, repayments, and interest rate buydowns issued.

Financing program managers may collect some forms of confidential information for their own fiduciary purposes; for example, borrower names, addresses and credit information are critical to the lenders. This information is not reported to DOE and is controlled by the lenders, the state or tribal organization or their contractors, not by Federal regulation.

### **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.**

The ICR asks no questions of a sensitive, personal, or private nature.

### **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.**

The EECBG burden below reflects the financing programs that were developed in the EECBG grant program. The total burden calculation is provided for all remaining financing programs. The reporting form and instructions are the same for all programs.

#### *EECBG Formula Program Burden Estimates*

The estimates below reflect Financing programs that continue indefinitely. These programs are generally in the form of loan loss reserve, rebate, and revolving loan programs.

*EECBG Formula - Annual Reporting burden for reporting entities*

As of the reporting period ending September 30, 2020, there were 54 reporting entities that file 101 Annual Reports on their financing programs. They are required to report annually for as long as the financing programs continue to operate with Federal funds. Each financing program manager will submit data for their Annual Report to PAGE, the electronic reporting system. After consulting with recipient financing program managers, program management has determined that it will take 3 hours for financing program managers to complete an Annual Report.

- 101 Financing program reports x 3 hours x 1 annual report = 303 hours annually

**Table A1. Estimated Respondent Hour Burden**

1910-5150 EECBG Annual Report	Type of Respondents	Number of Respondents	Annual Number of Responses	Burden Hours Per Response	Annual Burden Hours	Annual Reporting Frequency
EECBG Annual Reports	Staff	54	101	3	303	1
<b>TOTAL</b>		<b>54</b>	<b>101</b>		<b>303</b>	

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

**Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under ‘Annual Cost to Federal Government’.**

DOE estimates annualized cost to respondents for burden hours per report is \$160. Per the Bureau of Labor Statistics, state and local government employer costs averaged \$53.47 per hour worked. Wages and salaries averaged \$33.08 per hour worked and represented 61.9 percent of total compensation costs, while benefit costs averaged \$20.39 and accounted for the remaining 38.1 percent.<sup>i</sup>

**Table A2. Estimated Respondent Cost Burden**

Type of Respondents	Total Annual Burden Hours	Hourly Wage Rate	Total Respondent Costs
Staff	303	\$53.47	\$16,201
<b>TOTAL</b>	<b>303</b>		<b>\$16,201</b>

**A.13. Other Estimated Annual Cost to Respondents**

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

There are no other estimated annual costs resulting from this information collection.



## A.14. Annual Cost to the Federal Government

Provide estimates of annualized cost to the Federal government.

The development, hosting, and maintenance costs associated with the PAGE system are shared among three separate programs – EECBG, Weatherization Assistance Program, (WAP), and State Energy Program (SEP). Both WAP and SEP use PAGE for their active and retired grants, but only EECBG uses the portion of PAGE where the financing programs are housed. Strict security allows any user of PAGE to access only their own records. Currently, PAGE system maintenance and operational costs are estimated at \$137,000/month, or \$1,650,000/year; EECBG’s portion is approximately \$183,000/year. This is based on one ninth of the annual PAGE costs, because SEP and WAP each require four quarterly reports, for a total of eight reports, along with one annual report.

The estimated federal burden for 2021 is based on the total number of hours it would take to complete desktop reviews of reports and verify information that is unclear. The estimate for a fully burdened, average full time equivalent (FTE) person is approximately \$89.00/hour. The fully burdened rate estimates used a fully burdened labor rate of \$68/hour. This included a \$66/hour base rate for a GS 14 Step 5, which was based on current staffing, and 36% for fringe benefits, which was rounded down from the 36.25% fringe benefit factor included in OMB Circular A-76. DOE approximates 2 hours to review each report.

- 101 reports/year x 2 hours/report x \$89.00/hour = \$17,978

Thus, the total cost to the federal government for these reports is \$183,000 + \$17,978 = \$200,978

## 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.

Since 2017, the reporting burden was reduced by six reporting entities because they completely exhausted use of federal funds and retired their financing programs. Please note that the total cost burden change in the second row of the table below represents total time burden and does not include PAGE system costs.

**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	101	74		175
Total Time Burden (Hr)	303	222		525
Total Cost Burden	\$16,201	\$179,999		\$196,200

## A.16. Collection, Tabulation, and Publication Plans

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

DOE has no plans to publish the data from the Annual Reports.

### **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.**

Currently, OMB control numbers, expiration dates, and burden statements are displayed in *PAGE*. Therefore, DOE is not seeking approval to not display the expiration date.

### **A.18. Certification Statement**

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

There are no exceptions being requested.

<sup>i</sup> [Employer Costs for Employee Compensation Summary \(bls.gov\)](https://www.bls.gov/news.release/comp.ttl.htm)