

ATTACHMENT J

Detailed Burden and Cost Calculations

Wage Rates

Respondents

ICR Category	BLS Category	Overall Hourly	Wage	Fringe Benefit	Total Compensation	Overhead % of Total Compensation ^c	Overhead	Hourly Loaded Wages	Rounded
General civilian	All workers (average civilian worker) ^a	\$38.26	\$26.25	\$12.01	\$38.26	20%	\$7.65	\$45.91	\$46
Management	Management, business and financial ^b	\$74.94	\$52.01	\$22.93	\$74.94	20%	\$14.99	\$89.93	\$90
Technical	Professional and related ^b	\$69.80	\$46.57	\$23.23	\$69.80	20%	\$13.96	\$83.76	\$84
Clerical	Office and administrative support ^b	\$29.87	\$20.39	\$9.48	\$29.87	20%	\$5.97	\$35.84	\$36

^a Source: Bureau of Labor Statistics, 2020 (<https://www.bls.gov/news.release/pdf/ecec.pdf>)

^b Source: Bureau of Labor Statistics, 2020 (<https://www.bls.gov/web/ecec/ecsuhst.pdf>)

^c An overhead rate of 20% is used based on assumptions in *Handbook on Valuing Changes in Time Use Induced by Regulatory Requirements and Other U.S. EPA Actions* (EPA 2020).

Note: the loaded wage is only used when considering burden for technical materials, thereby excluding the POY Awards and redesign consultations.

Agency

ICR Category	OPM Category	Overall Hourly	Loading Factor ^a	Loaded Wages	Rounded
Management	GS-13 Step 5	\$56.31	1.639	\$92.29	\$92
Technical	GS-10 Step 10	\$41.25	1.639	\$67.61	\$68
Clerical	GS-5 Step 1	\$19.01	1.639	\$31.16	\$31

Source: Office of Personnel Management, 2021 (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/21Tables/html/DCB_h.aspx)

^a Source: Falk, J. 2012. "Comparing Benefits and Total Compensation in the Federal Government and the Private Sector." Congressional Budget Office Working Paper Series. (<https://www.cbo.gov/sites/default/files/112th-congress-2011-2012/workingpaper/2012-04fedbenefitswp0.pdf>)

IC #1: Safer Choice product recognition program applications

Respondents

Collection Activity	Hours and Costs Per Respondent							Total Hours and Costs		
	Mgr.	Tech.	Cler.	Response Hours/Yr	Labor Cost/Year	Capital Cost	O & M Cost*	Number of Respon.**	Total Hours/Yr	Total Cost/Yr
Partnership Agreements										
Review program information	1	1	0	2	\$174.00	\$0	\$0	44	88	\$7,656
Fill out and submit third-party information request form	0	5	1	6	\$456.00	\$0	\$0	44	264	\$20,064
Establish agreement with third-party profiler	1	1	1	3	\$210.00	\$0	\$12,400	44	132	\$554,840
Submit summary report to Safer Choice	1	1	0	2	\$174.00	\$0	\$0	44	88	\$7,656
Negotiate / establish Partnership Agreement w/ Safer Choice	1	2	0	3	\$258.00	\$0	\$0	44	132	\$11,352
<i>Subtotal</i>	<i>4</i>	<i>10</i>	<i>2</i>	<i>16</i>	<i>\$1,272.00</i>	<i>\$0</i>	<i>\$12,400</i>	<i>44</i>	<i>704</i>	<i>\$601,568</i>
Renewals and Audits										
Renew partnership, with no changes needed	0	3	1	4	\$288.00	\$0	\$0	36	144	\$10,368
Desk audit	0	2	2	4	\$240.00	\$0	\$0	24	96	\$5,760
Site audit	0	2	1	3	\$204.00	\$0	\$0	12	36	\$2,448
<i>Subtotal</i>	<i>0</i>	<i>7</i>	<i>4</i>	<i>11</i>	<i>\$732</i>	<i>\$0</i>	<i>\$0</i>	<i>36</i>	<i>276</i>	<i>\$18,576</i>
Adding Private Label Partners and Products										
Review program information	1	1	0	2	\$174.00	\$0	\$0	77	154	\$13,398
Fill out and submit online Private Label submission	0	4.5	1.5	6	\$432.00	\$0	\$0	77	462	\$33,264
<i>Subtotal</i>	<i>1</i>	<i>5.5</i>	<i>1.5</i>	<i>8</i>	<i>\$606</i>	<i>\$0</i>	<i>\$0</i>	<i>77</i>	<i>616</i>	<i>\$46,662</i>
TOTAL								157	1,596	\$666,806

* The cost for third-party profiler review and verification assumes that the typical application submitted by a cleaning product manufacturer will contain four products, each with 2 ingredients (\$650 each), 1 proprietary ingredient (\$1,300), and a \$500 administrative fee. The total cost per product is \$3,100. The total will be \$12,400 per company per application.

**This column reports the number of annual respondents after accounting for the partnership renewal process. Assumes that one in ten formulators over the three-year period will need to make changes to their formulations and go through a new partnership process which includes same collection steps. On an annual basis, this translates to 4 product formulators (for a total of 44 partnership agreements). Also assumes that about 33% of the remaining product formulators will be

subject to site audits each year (i.e., 12) and that about 66% (i.e., 24) will be subject to desk audits each year. Assumes that 77 partners will fill out Private Label submissions based on historical data.

Agency

Collection Activity	Hours and Costs Per Respondent						Total Hours and Costs		
	Mgr. Hours/Yr	Tech. Hours/Yr	Agency Hours/Yr	Labor Cost/Year	Capital / Startup Cost	O & M Cost	Number of Respon.*	Total Hours/Yr	Total Cost/Yr
Cleaning and Non-Cleaning Products									
Review program application forms	0	1	1	\$68	\$0	\$0	44	44	\$2,992
Review third-party profiler summary	0	5	5	\$340	\$0	\$0	44	220	\$14,960
Negotiate / establish Partnership Agreement with formulator	1	2	3	\$228	\$0	\$0	44	132	\$10,032
Review partnership renewal, with no changes needed	1	1	2	\$160	\$0	\$0	36	72	\$5,760
Review audit summaries	0	1	1	\$68	\$0	\$0	36	36	\$2,448
<i>Subtotal</i>	2	10	12	\$864	\$0	\$0	80	504	\$36,192
Adding Private Label Partners and Products									
Review Private Label submissions	0	2	2	\$136	\$0	\$0	77	154	\$10,472
<i>Subtotal</i>	0	2	2	\$136	\$0	\$0	77	154	\$10,472
TOTAL							157	658	\$46,664

*This column reports the number of respondents after accounting for the partnership renewal process. Assumes that one in ten formulators will need to make changes to their formulations and go through a new partnership process which includes same collection steps, i.e. 4, for a total of 44 annually. Assumes that 77 partners will fill out Private Label submissions based on historical data.

IC #2: Safer Choice label consultations

Respondents

Collection Activity	Number of Respondents	Frequency of Response	Hours Per Response	Total Burden Hours	Total Cost
Screening for Consumer Focus Groups	300	1	0.17	51	\$2,346
Consumer Focus Group Interviews	30	1	2	60	\$2,760
Consumer Online Survey	2,000	1	0.5	1,000	\$46,000
TOTAL	2,330	--	--	1,111	\$51,106

Note: No capital or operating and maintenance costs are incurred by respondents under this component of the ICR.

Agency

Collection Activity	EPA Burden Hours			EPA Costs	
	Mgr. Hours	Tech. Hours	Total EPA Hours	Contractor Cost*	EPA Cost
Consumer Focus Groups					
Prepare focus group materials	0.5	2	2.5	\$35,750 for ten focus groups	\$182
Prepare screener questionnaires	0.5	2	2.5		\$182
Organize and conduct focus groups	0	0	0		\$0
Review focus group results	5	20	25		\$1,820
<i>Subtotal</i>	6	24	30	\$35,750	\$2,184
Consumer Online Surveys					
Prepare consumer online surveys	1	4	5	\$23,625 for four consumer online surveys	\$364
Review consumer online survey results	2	8	10		\$728
<i>Subtotal</i>	3	12	15	\$23,625	\$1,092
TOTAL	9	36	45	\$59,375	\$3,276

Note: Due to the contractor costs, these figures represent the total agency burden across the three-year period of the ICR.

Note: No capital or operating and maintenance costs are incurred by the Agency under this component of the ICR.

* Contractor cost for consumer focus groups includes facility rental, recruiting, honorariums, transcription, and reimbursement to focus group participants for their travel and time (assumed \$100 per participant). Contractor cost for consumer online surveys includes questionnaire development, programming, online fielding and results reporting.

IC #3: Safer Choice Partner of the Year Awards program**Respondents**

Collection Activity	Estimated # of Applicants	Estimated Response Time (Hours)			Total Burden (Hours)				Total Cost
		Mgr.	Tech.	Cler.	Mgr.	Tech.	Cler.	Total	
Formulators/Product Manufacturers									
Review application and program information		0	1	0	0	19	0	19	\$1,326
Obtain senior approval		1	1	1	19	19	19	57	\$3,318
Complete and submit package		0	10	1	0	190	19	209	\$13,830
Subtotal	19	1	12	2	19	228	38	285	\$18,473.32
Innovators									
Review application and program information		0	1	0	0	5	0	5	\$349
Obtain senior approval		1	1	1	5	5	5	15	\$873
Complete and submit package ¹		0	10	1	0	50	5	55	\$3,639
Subtotal	5	1	12	2	5	60	10	75	\$4,861.40
Retailers									
Review application and program information		0	1	0	0	3	0	3	\$209
Obtain senior approval		1	1	1	3	3	3	9	\$524
Complete and submit package		0	10	1	0	30	3	33	\$2,184
Subtotal	3	1	12	2	3	36	6	45	\$2,916.84
Supporters									
Review application and program information		0	1	0	0	6	0	6	\$419
Obtain senior approval		1	1	1	6	6	6	18	\$1,048
Complete and submit package		0	10	1	0	60	6	66	\$4,367
Subtotal	6	1	12	2	6	72	12	90	\$5,833.68
Purchasers and Distributors									
Review application and program information		0	1	0	0	2	0	2	\$140

Obtain senior approval		1	1	1	2	2	2	6	\$349
Complete and submit package		0	10	1	0	20	2	22	\$1,456
Subtotal	2	1	12	2	2	24	4	30	\$1,944.56
TOTAL	35							525	\$34,030

Note: All respondents are from the private sector, other than potential respondents in the "Purchasers and Distributors" and "Supporters" categories which may include local and state governments.

Agency

Activities	Hours per Labor Category		Total Cost per Activity		Total Hours and Cost	
	Mgr. Hours	Tech. Hours	Mgr. Hours	Tech. Hours	Total Hours per Activity	Total Cost per Activity
Distribute forms	2	8	\$184	\$544	10	\$728
Answer questions	2	8	\$184	\$544	10	\$728
Record / enter forms	3	10	\$276	\$680	13	\$956
Verify information; Make awards selection	4	13	\$368	\$884	17	\$1,252
Notify applicants of decision	1	3	\$92	\$204	4	\$296
TOTAL	12	42	\$1,104	\$2,856	54	\$3,960