

SUPPORTING STATEMENT

Title: Brownfields Program – Accomplishment Reporting (OMB Control Number 2050-0192; EPA ICR No. 2104.09).

1. Necessity of Collection

This is a request to renew an existing Information Collection Request (ICR). This ICR covers the collection of information from those organizations that receive cooperative agreements and contract funding from EPA under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) as amended by the Brownfields Utilization, Investment, and Local Development (BUILD) Act (P.L. 115-141). Subtitle A of CERCLA, as amended, authorizes EPA to award grants or cooperative agreements to states, tribes, local governments, and other eligible entities to support the assessment and cleanup of brownfields properties. Contract funds can be awarded for training, technical assistance, and research related to brownfields. Subtitle C authorizes a noncompetitive \$50 million program to establish and enhance state and tribal response programs. The authority for these financial assistance programs is codified at CERCLA 104(k) and CERCLA 128(a) respectively. Congress appropriates specific amounts of funding for both programs in EPA's State and Tribal Assistance Grant account.

With this ICR, EPA's Office of Brownfields and Land Revitalization (OBLR) seeks authorization to collect information from contract and cooperative agreement recipients (recipients) using several standard forms that will streamline the data collection effort and improve the quality of information collected. The information collected under this ICR supplements the minimum reporting and record keeping requirements that cooperative agreement recipients are subject to under 2 CFR Part 200 and 2 CFR Part 1500. EPA estimates that all respondents who voluntarily respond to this information collection by electing to participate in the Brownfields program have determined that the expected benefits of participation outweigh any burden associated with preparing the response.

2. How, By Whom, and For What Information is Collected

Under CERCLA 104(k) states, tribes, local governments, and other eligible entities may receive cooperative agreements to:

- (1) inventory, characterize, assess, and conduct planning and community involvement related to brownfields sites;
- (2) carry out cleanup activities at brownfields sites;
- (3) capitalize revolving loan funds and provide subawards for cleanup activities; and
- (4) support the research, technical assistance, and training including the creation and implementation of environmental job training and placement programs.

CERCLA 104(k) also authorizes contract funding to provide training, technical assistance, and research related to brownfields.

Under CERCLA 128(a) States and tribes may receive cooperative agreements to:

- (1) establish or enhance a response program that includes elements such as:
 - a. Surveys and inventories of brownfield sites.
 - b. Oversight and enforcement authorities including legislation, regulations, procedures, or guidance that would establish or enhance the legal structure of the program.
 - c. Opportunities for public participation in the process of developing a public record for cleanup decisions and other site activities.
 - d. Approval of cleanup plans and verifications that response actions are complete.
 - e. Site-specific assessment and cleanup activities at brownfield sites.
- (2) capitalize a revolving loan fund for brownfields remediation under CERCLA 104(k) (3); and
- (3) purchase environmental insurance, develop a risk sharing or indemnity pool, or other insurance mechanisms for the response program.

Under CERCLA 101(39), a brownfields site means real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. Brownfields sites may also include property contaminated with petroleum. For funding purposes, EPA uses the term “brownfields property(ies)” synonymously with the term “brownfields site(s).”

While the Agency collects basic cooperative agreement information as part of its federal stewardship responsibilities to manage and oversee recipient activities and expenditures under 2 CFR Part 200, OBLR needs additional information from recipients to be reported in a consistent manner to evaluate the effectiveness of the program and to report on program activities and accomplishments to Congress and other program stakeholders. Grantees and contractors are given access to the Assessment Cleanup and Redevelopment Exchange System (ACRES) to electronically enter form information for immediate submission to the Brownfields Program. OBLR has used and will continue to use the information collected from recipients to oversee the activities carried out using Brownfields’ funds, to evaluate program implementation and effectiveness, and to meet the Agency’s responsibilities under the Government Performance and Results Act to report on OBLR’s accomplishments. The information collection activities covered by this renewed ICR are intended to: (1) continue to improve the alignment of reporting

requirements with programmatic performance measures; and (2) simplify and standardize reporting requirements to reduce uncertainty and burden imposed on recipients. Without the information collection, OBLR would have limited access to information needed to effectively assess the relationship between those activities funded by EPA’s Brownfields cooperative agreements and the intent of Congress with the passage of the Brownfields Amendments.

3. Electronic Submission

For ease, recipients enter the information into the Agency’s ACRES Database. ACRES was developed to fulfill the requirements under the Government Paperwork Elimination Act (Public Law 105-277). This electronic reporting process is integrated with EPA’s Enterprise Architecture to further streamline the Agency’s data management and reporting responsibilities. EPA released the electronic reporting process in January 2007 and all Brownfields recipients starting from FY 2003 have been given access. EPA has modified its reporting guidance and provides training on the electronic reporting process. The database is consistently updated, with the latest interface overhaul occurring in 2022. EPA has achieved positive returns in user acceptance of the electronic reporting process since its release and the electronic reporting process reduces the burden placed on recipients.

4. Non-duplication, Consultations, and Other Collection Criteria

There is no other known source for the information that EPA seeks under this ICR. Moreover, this ICR supplements, and does not duplicate, the information that EPA collects as part of its reporting and record keeping provisions under the Agency’s general assistance regulations at UGG 2 CFR Part 200 which became effective December 26, 2014. **Exhibit 1** identifies the tasks and burdens of recipients that are covered under other OMB-approved ICRs. This ICR addresses the burden imposed on recipients and EPA associated with the reporting requirements that are unique to cooperative agreements awarded by EPA under authority of CERCLA 104k and CERCLA 128(a).

Exhibit 1: Grant Burdens Covered Under Other Agency ICRs

Task/Burden	Authority	Agency Approved ICR
Preliminary Grant Proposal	2 CFR Part 200	OMB 2030-0020
Final Grant Proposal	2 CFR Part 200	OMB 2030-0020
Budget Sheets	2 CFR Part 200	OMB 2030-0020
Quarterly Progress Reports	2 CFR Part 200	OMB 2030-0020
Notification of Significant Developments	2 CFR Part 200	OMB 2030-0020
Procurement Reports	2 CFR Part 200	OMB 2030-0020
Financial Reports	2 CFR Part 200	OMB 2030-0020
Project Records	2 CFR Part 200	OMB 2030-0020

5. Impact on Small Businesses

This information collection request is expected to affect small governmental jurisdictions, which are defined as governments of cities, counties, towns, townships, villages, school districts, or special districts with populations of less than 50,000. This definition may also include Indian Tribes, in keeping with the President's Federal Indian Policy. EPA has considered whether to establish different reporting requirements for small entities and has determined that: (1) different reporting requirements among recipients will result in inconsistent data that may lessen the Agency's ability to oversee and report on program activities and accomplishments; (2) the burden imposed by this information collection is relatively small and small entities should not be unduly burdened by the reporting requirement; and (3) the Brownfields program is voluntary and respondents who elect to participate in this program have determined that the expected benefits of participation outweigh any burden associated with preparing the response.

6. Consequences of Non-Collection or Less Frequent Collection

The information collection schedule is consistent with the Agency's reporting schedule for general assistance agreements. Less frequent collection may not enable EPA to oversee and manage Brownfields cooperative agreements effectively and would lessen OBLR's ability to report up-to-date and accurate information on program activities and accomplishments. In consideration of the burden imposed on recipients, EPA has adopted less frequent reporting for the Property Profile Form in which recipients are required to update and submit the form as notable activities or changes occur at a particular property. EPA anticipates that recipients of CERCLA 104(k) assessment, cleanup, revolving loan fund, and multipurpose cooperative agreements will submit an updated Property Profile Form to EPA at least twice but not more than four times over the life of the cooperative agreement. For CERCLA 128(a) state and tribal response program cooperative agreements, EPA anticipates that recipients will submit a Property Profile Form to EPA twice a year in line with the bi-annual reporting guidelines. 128(a) recipients will also submit the PALs form once a year in line with their end-of-year reporting. For Job Training Recipients, EPA anticipates recipients will submit the form no more than twice annually. EPA anticipates technical assistance grantees and contractors will submit forms quarterly, in line with their terms and conditions.

7. Special Reporting Requirements

The information collection is consistent with the guidelines set forth in 5 CFR 1320.6 of the Paperwork Reduction Act Guidelines. There are no known special circumstances that would require reporting on an alternative timeline or methodology.

8. 60-Day FR Notice and Efforts to Consult with Grantees

60-Day FR Notice: Published March 25, 2022. No comments were received. This was the first notification of the Agency's request for the renewal of this ICR.

Consultations: EPA has more than 25 years of experience managing Brownfields cooperative agreement programs that awarded more than 6,000 cooperative agreements to state, local, and tribal governments to address brownfields properties. For these Brownfields cooperative agreements, EPA staff has worked closely with the recipients to help them participate in the program and address their brownfields properties. As such, EPA has a detailed understanding of the activities that recipients undertake and the burden they incur for voluntarily participating in EPA's cooperative agreement programs. In addition, during the preparation of the initial ICR in 2003 and the reporting forms that are included, EPA contacted eight Brownfields recipients to ask them specific questions about the burden associated with completing the draft forms included in this ICR. Recipient responses form the basis of EPA's initial calculations of the burden hours and costs.

Since the initial ICR, there have been several revisions to help improve the original Property Profile and Job Training Reporting Forms to ensure they are as efficient as possible for cooperative agreement recipients. For the first renewal in 2006, the ICR was expanded to include reporting from CERCLA 128(a) recipients. To do so, EPA consulted with several State and Tribal representatives when working on modifications to the Property Profile Form. For the second renewal in 2009, EPA added additional fields to the Property Profile Form. EPA contacted eight Brownfields recipients to ask them specific questions about the burden associated with completing the draft new fields for the Property Profile Form included in the renewal. In 2012, EPA made no changes to the Property Profile Form and Job Training Reporting Form. In 2015, EPA made changes to streamline some questions on the Property Profile Form, including making it easier to identify the correct geographical location of a property, and avoid duplicate property records in ACRES. Additionally, EPA created a new form for the Area-Wide Planning recipients to make it easier for them to report their accomplishments to EPA.

For the 2019 renewal of the ICR, EPA shortened the Property Profile Form, eliminating questions that were not resulting in regular responses from recipients, while also clarifying past questions that caused confusion. EPA also added the Program Activity Levels (PALs) Form, a new form for CERCLA 128(a) recipients to update annually. This will allow a much more streamlined approach for 128(a) recipients than the current technique for gathering the needed information. No changes were made to the Job Training Reporting Form and Area-Wide Planning Reporting Form. For the 2020 renewal, no changes were made.

For the current renewal, questions were added to the Property Profile Form to capture site-specific activities addressing climate change. The Form also added a census tract question to track work being done in disadvantaged communities. Questions specific to revolving loan fund recipients were clarified to better track program income and post-closeout status. Nine different cooperative agreement recipients were contacted to discuss the clarity, format and increased burden estimate from the additional questions. The PALs form was updated to clarify questions, as this is the first full ICR update since its initial implementation in 2019. Four current grantees were contacted regarding the PALs changes. The Job Training Form added a question to clarify the number of training cycles offered by grantees; four current grantees were consulted on this change. As a result of increased funding from the Bipartisan Infrastructure Law, two additional reporting forms are being submitted in this ICR package to capture work done by technical assistance grantees and contractors. Technical assistance activities have not previously been

captured in ACRES. The addition of these reporting forms will help the Brownfields Program demonstrate its impact through activities that are not site-specific. Five different grantees and contractors collaborated on the creation of these forms to ensure they accurately capture the outputs and outcomes of such projects.

9. Payment or Gift to Respondents

No payment or gift is given to respondents.

10. Assurance of Confidentiality

No confidentiality is provided, and no sensitive information is collected under this ICR.

11. Questions of Sensitive Nature

Sensitive questions are not associated with the information collection activities performed under Public Law 107-118.

12. Hour Burden

Total Hour Burden Estimate: 3,808

Methodology:

Estimating respondent burden - A “unit” burden is the burden incurred by a respondent for performing a specific activity that is not covered by another ICR (such as 2 CFR Part 200). The estimated burden is incurred by the following activities:

- Initial completion of the Brownfields Property Profile Form
- Periodic updating of the Brownfields Property Profile Form (PALs) to report progress on specific properties undergoing assessment, cleanup, or redevelopment
- Completion of the Job Training Reporting Form
- Completion of the Program Activity Levels form
- Initial completion of the Technical Assistance to Brownfields Form (TA) Form
- Periodic updates of the TA Form to report progress on cooperative agreement deliverables
- Initial completion of the Grantee Reported Technical Assistance to Brownfields (TAB) Form
- Periodic updates to the TAB form to report progress on cooperative agreement deliverables
- Completion of RLF Program Income Form

The estimated burden for respondents is presented in Exhibit 2.

If any burdens were found to be imposed in the ICR by a rule that supersedes CERCLA, as amended, those burdens, or a percentage of those burdens, were removed from the overall burden calculation in this ICR (see Exhibit 1).

Exhibit 2 - Annual Respondent Burden and Cost

Activity	Unit Burden	Unit Labor	Total Unit Cost	Average Number of	Total Burden Hours/Year**	Total Cost/Year
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	(Hours)	Cost (Dollars) *	(Dollars)*	Responses/Year**		(Dollars)**
Initial Completion of Property Profile Form (Subtitle A)	0.5	\$126.24	\$63.12	2,150	1,075	\$135,706
Initial Completion of Property Profile Form (Subtitle C)	0.5	\$126.24	\$63.12	1,632	816	\$103,010
Update of Property Profile Form (Subtitle A)	0.5	\$126.24	\$63.12	1,505	753	\$94,994
Update of Property Profile Form (Subtitle C)	0.5	\$126.24	\$63.12	816	408	\$51,505
Job Training Reporting Form	3	\$129.04	\$387.13	25	75	\$9,678
Program Activity Levels form	2	\$129.39	\$258.79	200	400	\$51,757
Initial Completion of TA Form	1.33	\$120.52	\$160.29	40	53	\$6,412
Update of TA Form	0.66	\$120.52	\$79.54	120	79	\$9,545
Initial Completion of TAB Form	3.66	\$119.48	\$437.30	11	40	\$4,810
Update of TAB Form	2.6	\$119.48	\$310.65	33	86	\$10,252
RLF Program Income Form	0.75	\$126.24	\$94.68	30	23	\$2,840
TOTAL				6,562	3,808	\$480,509
AVERAGE TOTAL COST PER BURDEN HOUR					\$126.18	

* Unit Labor Cost in Dollars reflects a “loaded” rate for benefits and overhead.

** Figures may not sum due to rounding.

Estimating respondent costs - To estimate the unit burden (hours) and hourly rate for this information collection activity, EPA relied on its extensive experience working closely with Brownfields recipients, as well as in-depth interviews with nine current or former cooperative agreement recipients submitting the Property Profile Form, four job training recipients submitting the Job Training Form, four 128(a) recipients submitting the PALs form, five CERCLA 104(k) technical assistance recipients submitting the TA and/or TAB form, and four revolving loan fund recipients completing the RLF Program Income Form. Those interviewed were shown draft copies of all forms and accompanying instructions and guidance that would be used for reporting and asked to estimate: (1) the number of hours that would be required to perform each task; and (2) the labor mix required to perform each task (e.g., percentage of management, technical, clerical). The data gathered from these interviews were then analyzed to estimate the unit burden and labor mix. For all form types, the unit labor cost (dollars) for this burden estimate is a weighted hourly rate based upon the estimated labor mix and wage rates gathered from the U.S. Bureau of Labor Statistics (BLS).

On the Property Profile Form, consultations indicate that the average recipient will incur 34 percent of its burden with executive/managerial staff labor, 50 percent with professional specialty staff labor, and 17 percent with program participants and partners. This labor mix was applied to BLS, National Compensation Survey (NCS) data issued in Dec 2021 for a weighted hourly rate of \$60.11 and an estimated fully loaded rate of \$ \$126.24.

On the Job Training Reporting Form, consultations indicate that the average recipient will incur 50 percent of its burden with executive/managerial staff labor, 22 percent with professional specialty staff labor, 22 percent with finance labor, or clerical labor, and 6 percent with program participants and partners. This labor mix was applied to BLS, National Compensation Survey (NCS) data issued in Dec 2021 for a weighted hourly rate of \$61.45 and an estimated fully loaded rate of \$129.04.

On the Program Activity Level Form, consultations indicate that the average recipient will incur 84 percent of its burden with executive/managerial staff labor, and 17 percent with program participants and partners. This labor mix was applied to BLS, National Compensation Survey (NCS) data issued in Dec 2021 for a weighted hourly rate of \$61.62 and an estimated fully loaded rate of \$129.39.

On the Technical Assistance to Brownfields Form, consultations indicate that the average recipient will incur 42 percent of its burden with the executive/managerial staff labor, 50 percent with technical labor, 8 percent with administrative support or clerical labor. The labor mix was applied to the BLS, National Compensation Survey (NCS) data issued in Dec 2021 for a weighted hourly rate of \$57.39 and an estimated loaded rate of \$120.52.

On the Grantee Reported Technical Assistance to Brownfields Form, consultants indicate the average recipient will incur 64 percent of its burden with executive/managerial staff labor, 24 percent with technical labor, and 13 percent with administrative or clerical labor, The labor mix was applied to the BLA, National Compensation Survey (NCS) data issued in Dec 2021 for a weighted hourly rate of \$56.90 and an estimated fully loaded rate of \$119.48.

On the RLF Program Income Form, consultations indicate that the average recipient will incur 33 percent of its burden with executive/managerial staff labor, 33 percent with professional specialty staff labor, and 33 percent with finance labor. This labor mix was applied to BLS, National Compensation Survey (NCS) data issued in Dec 2021 for a weighted hourly rate of \$60.11 and an estimated fully loaded rate of \$126.24.

CERCLA 104(k) assessment, cleanup, revolving loan fund and multipurpose recipients, and CERCLA 128(a) recipients that conduct property specific activities will be required to report progress with the “Brownfields Property Profile Form.” EPA anticipates that the initial completion of this form will require approximately .5 hours for a unit burden of \$63.12. Recipients will be required to update this form as milestones are achieved, though not more frequently than quarterly. It is estimated that each update will require approximately 0.5 hours for a unit burden of \$63.12. It is estimated that each form will be updated an average of twice per

year. Revolving loan fund recipients also report on the RLF Program Income Form annually. It is estimated this annual update will require 0.75 hours for a unit burden of \$ \$94.68.

Job Training recipients will be required to report progress on a quarterly basis using EPA's "Job Training Reporting Form." Recipients will be required to report progress on a quarterly basis, with each update requiring approximately 3 hours for a unit burden of \$ \$387.13. Most of this burden stems from the activities associated with the collection of salary or wage information from Environmental Workforce Development Job Training program participants who find employment.

CERCLA 128(a) recipients will be required to report progress on an annual basis using EPA's "Program Activity Levels" form. Recipients will be required to report progress on an annual basis, with each update requiring approximately 2 hours for a unit burden of \$ \$258.79. Most of this burden stems from the activities associated with the collection of the overall activities conducted by the response program to establish or enhance their program, and the number of sites that are currently enrolled in their response program, or otherwise supported by their response program.

CERCLA 104(k) technical assistance recipients will be required to report progress with the appropriate TA or TAB Form. EPA anticipates that the initial completion of the TA form will require approximately 1.33 hours for a unit burden of \$ \$160.29. It is estimated that each update will require approximately 0.66 hours for a unit burden of \$ \$79.54. EPA anticipates that the initial completion of the TAB form will require approximately 3.66 hours. For a unit burden of \$437.30. It is estimated that each update will require approximately 2.6 hours for a unit burden of \$310.65. Recipients will be required to update this form as milestones are achieved, though not more frequently than quarterly.

Assessment, cleanup, multipurpose and job training cooperative agreements awarded under CERCLA 104(k) cover a period of performance of up to three years, and revolving loan fund cooperative agreements cover a period of performance up to five years. Based on the Agency's experience under its program, EPA estimates that at the end of two years, approximately 75 percent of cooperative agreements will receive a no-cost extension, approximately 20 percent of recipients will receive supplemental awards, and 5 percent of cooperative agreements will close out. Recipients that receive either a no-cost extension or a supplemental award will be required to continue to report on their activities using the forms authorized under this ICR. In addition, cooperative agreements that have closed out may undergo a five-year review conducted five years after close out. The five-year review gathers data on the status of properties that benefited from EPA funding while the cooperative agreement was active using the forms authorized under this ICR. This burden is included in the estimated number of responses per year and, therefore, the overall burden calculation estimated for this ICR.

All awards made under CERCLA 128(a) have at least a one-year period of performance or can be a multi-year award depending on the State's financial need for continued funding. Based on the Agency's understanding of State response programs, EPA estimates that one-half of the State recipients have sophisticated response programs and can complete property specific activities within one year, therefore submitting a total of two responses. EPA further estimates that the

remaining State, tribal, and US territories that receive funding take two years to complete property specific activities therefore submitting a total of four responses.

All technical assistance cooperative agreements awarded under CERCLA 104(k) cover a period of performance of up to five years. Rarely are these cooperative agreements extended, and all required reporting will be completed within the initial award period. Technical assistance contracts awarded under CERCLA 104(k) are also rarely extended. The burden estimated by the number of responses per year is based on forms anticipated to be submitted over the original timeframe of the associated cooperative agreement or contract.

13. Estimate for total annual cost burden (not including hour burden)

Start-up costs to meet the Brownfields reporting requirements are minimal and are a part of the customary and usual expenses incurred by recipients. There are no capital costs related to Brownfields reporting requirements. Therefore, total start-up and capital costs are zero. There are no operation and maintenance costs required.

14. Annualized Costs to the Federal Government

Total annual cost to the Federal Government: \$108,011

Methodology:

Agency burden and costs - EPA incurs a burden in the process of requesting, reviewing, and processing the information covered by this ICR. This burden includes:

- Reviewing and processing initial Brownfields Property Profile Forms
- Reviewing and processing updates of Brownfields Property Profile Forms
- Reviewing and processing Job Training Reporting Forms
- Reviewing and processing PALs Forms
- Reviewing and processing initial TA Forms
- Reviewing and processing updates to TA Forms
- Reviewing and Processing initial TAB Forms
- Reviewing and processing updates to TAB Forms
- Reviewing and processing RLF Program Income Form

The estimated burden associated with EPA activities is presented in Exhibit 3.

Exhibit 3 - Annual Agency Burden and Cost

Activity	Unit Burden (Hours)	Unit Labor Cost (Dollars)*	Total Unit Cost (Dollars)*	Average Number of Responses/Year**	Total Burden Hours/Year**	Total Cost/Year (Dollars)**
Review and Process Initial Completion of Property Profile Form	0.33	\$53.03	\$17.50	2,150	710	\$37,625

(Subtitle A)						
Review and Process Initial Completion Property Profile Form (Subtitle C)	0.33	\$53.03	\$17.50	1,632	539	\$28,560
Review and Process Update to Property Profile Form (Subtitle A)	0.25	\$53.03	\$13.26	1,505	376	\$19,953
Review and Process Update to Property Profile Form (Subtitle C)	0.25	\$53.03	\$13.26	816	204	\$10,818
Review and Process Job Training Reporting Form	0.6	\$53.03	\$35.33	25	15	\$883
Review and Process PALs Form	0.5	\$58.57	\$29.28	200	100	\$5,857
Reviewing and Process Initial TA Form	0.5	\$58.57	\$29.28	40	20	\$1,171
Reviewing and Process Update of TA Form	0.25	\$58.57	\$14.64	120	30	\$1,757
Review and Process Initial TAB Form	0.5	\$57.83	\$28.91	11	6	318
Review and Process Update of TAB Form	0.33	\$57.83	\$19.08	33	11	\$630
Review and process RLF Program Income Form	0.25	\$58.57	\$14.64	30	8	\$439
TOTAL				6,562	2019	\$108,011
AVERAGE TOTAL COST PER BURDEN HOUR						\$53.50

* Unit Labor Cost in Dollars reflects a “loaded” rate for benefits and overhead.

** Figures may not sum due to rounding.

The burden imposed upon EPA was estimated by: (1) interviewing EPA Regional and Headquarters staff to gather individual estimates of the time required to perform each activity and the GS level of the staff performing those tasks; (2) averaging the time data to estimate the number of hours required for each burden element; (3) averaging the data on the percentage of time performed by particular staff GS levels; (4) developing a weighted hourly rate based upon percentage of staff labor at different GS levels devoted to each task; and (5) determining the product of the weighted hourly rate and the number of hours required per activity.

The weighted hourly rate utilized in the Federal burden estimate is based upon the following composite:

GS Level	Percent	Hourly Wage Rate*
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GS 4, Step 1	8%	\$13.31
GS 11, Step 1	12%	\$27.30
GS 13, Step 1	67%	\$38.92
GS 14, Step 1	13%	\$45.99
Weighted Rate		\$36.44

*Rates for 2022 General Schedule (<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/22Tables/html/GS.aspx>)

15. Reasons for Program Changes or Adjustments on Burden Worksheet

The burden hours estimate decreased from 6,143 hours in the 2020 ICR request to 3,808 hours, a difference of minus 2,335 hours. This large change can be attributed to tremendous improvements in the ACRES database to streamline reporting requirements. Additional ACRES training and outreach efforts have also greatly increased grantees familiarity with the database. Grantees have reported that ACRES is now more intuitive, and the layout is significantly easier to follow. Grantees interviewed for this burden estimate self-reported data entry times at half the burden hours compared to estimates gathered 2 years ago. These combined factors result in the significant burden reduction.

16. Published Results

Results from this ICR are not published formally. They are used to calculate agency-level accomplishments and site-specific impacts on publicly available EPA websites.

17. Approval for not displaying OMB Expiration Date

N/A

18. Exceptions to the “Certification for Paperwork Reduction Act Submissions”

N/A