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:** Assessment of Environmental Performance Standards and Ecolabels for Federal Procurement

 **EPA ICR No.:** 2516.04

 **OMB Control No.:** 2070-0199

 **Docket ID No.:** EPA-HQ-OPPT-2014-0838

### Abstract

This ICR, which seeks to reinstate a previously approved ICR, covers the information collection activities associated with the Agency’s evaluation of private sector standards and ecolabels per EPA’s Framework for the Assessment of Environmental Performance Standards and Ecolabels for Federal Purchasing (Framework), formerly referred to as the Guidelines.

EPA’s goal in developing this Framework is to create a transparent, fair, and consistent approach to selecting product environmental performance standards and ecolabels to support the Agency’s mission and federal sustainable acquisition goals and mandates. The fundamental aim of this Framework is to establish a cross-sector approach to be used in recognizing private sector environmental performance standards (and consequently, environmentally preferable products and services meeting these standards) for use in federal purchasing.

The Framework includes scoping questions and four sections:

1. *Criteria for the Process for Developing Standards* refers to the procedures used to develop, maintain, and update an environmental standard.
2. *Criteria for the Environmental Effectiveness of the Standards* refers to the criteria in the environmental standard or ecolabel that support the claim of environmental preferability.
3. *Criteria for Conformity Assessment* refers to the procedures and practices by which products are assessed for conformity to the requirements specified by standards and ecolabeling programs.
4. *Criteria for Management of Ecolabeling Programs* refers to the organizational and management practices of an ecolabeling program.

In 2016, EPA conducted a pilot to test the original set of criteria within the Framework against standards and ecolabels in the flooring, furniture, and paints/coatings categories. EPA has made several edits to the Framework based on lessons learned from the pilot and the desire to address a broader range of sectors with a more streamlined set of criteria. In this next phase of work, EPA intends to expand its recommendations by assessing standards and ecolabels in purchase categories that support Executive Order 14008 Tackling the Climate Crisis at Home and Abroad and Executive Order 14057 on Catalyzing American Clean Energy Industries and Jobs through Federal Sustainability.

Summary Total Burden and Costs

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Information Collection** | **Total Number of Respondents**  | **Responses per Respondent** | **AnnualBurden Hours**  | **Annual Costs** |
| Standard/Ecolabel Organizations **previously assessed** per EPA Framework | 20 | 2 | 66.67 | $4,276 |
| Standard/Ecolabel Organizations **NOT previously assessed** per EPA Framework | 80 | 2 | 640 | $41,046 |
| **Respondent Total**  | **100** | **2** | **707.00** | **$45,322** |
| **Agency Total**  | **-** | **-** | **303.33** | **$32,081**  |

# Supporting Statement

## 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 collection of information.

EPA is engaging in this collection pursuant to the authority in the Pollution Prevention Act (42 U.S.C.A. section 13103(b)(11); see Attachment 1) which requires EPA to “Identify opportunities to use Federal procurement to encourage source reduction” and section 12(d) of the “National Technology Transfer and Advancement Act of 1995” (15 U.S.C. 3701 note; hereinafter “the NTTAA;” see Attachment 2), which requires Federal agencies to “use technical standards that are developed or adopted by voluntary consensus standards bodies, using such technical standards as a means to carry out policy objectives or activities.” Office of Management and Budget (OMB) Circular A-119 (titled “Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities”) reaffirms Federal agency use of private sector standards in procurement and Federal Acquisition Regulation (FAR) Part 23.703 (b) (1) directs Federal agencies to “Maximize the utilization of environmentally preferable products and services (based on EPA-issued guidance)”.

Federal purchasers need this assessment per the Framework to determine which, among sometimes dozens of private sector standards within a single purchase category, are appropriate and effective in meeting federal procurement goals and mandates.

While Federal purchasing policy is clear for the several standards and ecolabels that are listed in statute, regulation, or Executive Order, the lack of independently assessed information about and federal guidance on using other private sector environmental performance standards and ecolabels often results in an inconsistent approach by Federal purchasers and confusion and uncertainty for vendors and manufacturers.

## 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

As envisioned by EPA and supported by public comment, it would not be practical for individual procurement officers or even individual federal agencies to assess and make determinations regarding which private sector environmental performance standards and ecolabels are appropriate and effective in meeting federal procurement goals and mandates. Therefore, EPA serves government-wide interest in assessing and recommending standards and ecolabels to support the aforementioned environmentally preferable purchasing goals and mandates in a fair, transparent, and consistent manner based on agreed upon criteria and independent assessment.

The Framework to be used for assessing standards and ecolabels includes criteria for both the process by which standards and ecolabels are developed and managed and the effectiveness of the standards and ecolabels in protecting environmental and human health. Some of this information can be collected by reading the standard; other aspects need to be collected via written responses and supporting documentation provided by the ecolabel owner or standards development organization.

EPA will call for volunteer standard and ecolabel organizations to submit information and will phase assessments by purchase category based on Administration priorities and available resources over the next three years. Completed Framework Submission Templates – for those standards and ecolabels that meet minimum criteria and are incorporated into EPA’s Recommendations of Specifications, Standards and Ecolabels – will be made available to interested parties upon request.

## 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, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

Respondent standard, certification, and ecolabel organizations will provide written responses and supporting documentation within the Framework submission template via email.

## Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

There has been no other effort to systematically collect such comprehensive information about private sector standards and ecolabels for use in federal purchasing. Additionally, where public sources of data are available, they will be consulted in lieu of asking respondents to do so. EPA has also reviewed and included standards and ecolabels assessed by other federal agencies to reduce burden on standards developers and ecolabel owners and harmonize federal sustainable procurement guidance and use previous federal assessments.

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

It is expected that some of the participants in the effort will be small standards development and ecolabel program entities. The information collection shall be designed to minimize respondent burden while obtaining sufficient and accurate information. In addition, given the voluntary nature of the collection, it is expected that respondents will participate only if the benefits of participation (greater access to the federal marketplace) outweigh the information collection burden.

## 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.

This effort will inform the frequency of information collection appropriate for Federal procurement needs. It is likely that the frequency of information collection will be dependent upon 1) future business models for collection (e.g., if there is a greater reliance on the private sector’s conformity assessment infrastructure versus federal sponsorship/funding of assessments), 2) the speed of market transformation toward sustainability in particular sectors, and 3) changes in standards and ecolabel trends in particular sectors. Less frequent assessments may lead to less effective/useful Recommendations of Standards and Ecolabels for Federal Purchasing since it would result in missing available new and innovative standards and ecolabels to use in federal purchasing.

## Explain any special circumstances that require the collection to be conducted in a manner:

**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 produce valid and reliable results that can be generalized to the universe of study;**

**f) requiring the use of a 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 statute or 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.**

Not applicable.

## 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 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 reported.**

Additionally, under 5 CFR 1320.8(d)(1), OMB requires agencies to consult with potential ICR respondents and data users about specific aspects of ICRs before submitting an ICR to OMB for review and approval. In accordance with this regulation, EPA submitted questions to several interested parties via email Attachment 7. The individual entities contacted were:

* NSF International
* Cradle to Cradle Product Innovations Institute
* International Living Future Institute
* Global Electronics Council
* Green Seal
* State of Massachusetts
* State of California
* State of New York

A copy of EPA’s consultation to the above potential respondents are in Attachment 7 and are available in the docket.

EPA received two comments during the 60-day public review opportunity (87 FR 11426) (FRL-9117-01-OCSPP).

The Resilient Floor Covering Institute submitted a comment (see Attachment 10) – unrelated to the information collection burden – regarding the Agency’s leadership criterion IV.14 for assessing directories/registries of certified products/services, suggesting that the criterion be stated more clearly and encourage greater functionality of the directories/registries, including an application program interface (API).

EPA appreciates the suggested edits to clarify the intent of this criterion and has updated the criterion. These edits do not affect the information collection burden.

The Sustainable Forestry Initiative submitted a comment (see Attachment 9) – also unrelated to the information collection burden -- encouraging EPA to 1) rely on voluntary consensus standards; 2) ensure that EPA’s environmental effectiveness assessment recognize the value of single-attribute standards and rely on credible assessment processes, and 3) rely on independent verification of standards.

EPA appreciates these comments which align with the Framework approach and implementation intentions.

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

Not applicable.

## Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

It is not expected that any information collected in this ICR will involve confidential business or trade secret information.

## 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 the agency 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 information collection activities discussed in this document do not involve any sensitive questions.

## Provide estimates of the hour burden of the collection of information. The statement should:

1. **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, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
2. **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
3. **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’.**

Respondents will be standards development organizations, ecolabel programs, and certification entities that manage product or service environmental performance standards and/or ecolabels that could be considered for use in United States federal sustainable procurement efforts. In particular, standards and ecolabels should cover purchase categories that meet some or all the following criteria:

* Potentially significant climate, environmental, and/or human health impact
* Significant volume of federal purchases; and
* Current federal sustainable acquisition mandates in the category don’t exist, don’t address all key environmental impacts, are limited, out-of-date, and/or could be augmented with private sector standards/ecolabels.

EPA will prioritize assessment of responses per the Framework based on Administration priorities, how well a standard/ecolabel aligns with these criteria, and available resources to conduct assessment activities.

The need for and timing of future collection of information will be determined in consultation with other federal agencies.

EPA based its burden estimates on an initial survey of a subset of government and private sector (less than 9) environmental performance standards and ecolabel developers and then the 2016 pilot participants. The respondents were contacted following the survey and the completion of the pilot and were asked how long it had taken them to complete the process. For the initial survey, two respondents took as little as 30 minutes to complete the survey, seven respondents took 2-6 hours, two respondents took 16 hours, and one respondent (who covered three different ecolabels in its responses) took 50-60 hours. For the pilot, respondents were asked to respond to all criteria and provide a broader range of supporting documentation as evidence. The average time spent per ecolabel on completing the final pilot Framework in 2016 was 15 hours.

Given changes made to this new version of the Framework – to streamline criteria required for response and to limit supporting documentation for submission – the average burden is estimated to be 8.5 hours per response (average 12 hours for respondents that did not participate in the pilot; average 5 hours for respondents that did previously participate in the pilot). Only standard development and ecolabel organizations who volunteer for assessment will be included. EPA anticipates assessing no more than 200 standards and ecolabels over the next three years, including reassessments of those already included in the Recommendations. EPA does not know the exact number of assessments that will be conducted in each of the three years at this time, therefore they are assumed to be equally distributed across the three years in the ICR.

For this ICR, EPA assumes that nonprofit standards development organizations will be responding to the data collection. In order to estimate total respondent burden and cost associated with this ICR, Bureau of Labor Statistics (BLS) data on wages and fringe benefits (total compensation) are used. Note that BLS does not routinely collect wage data on nonprofit organizations, however, in a monthly labor review from January 2016, BLS identified total compensation hourly rates (2014) for nonprofit organizations in three general industry groups as follows:[[1]](#footnote-2)

* Professional and Business Services - $47.85 per hour
* Education and Health Services - $37.17 per hour
* Other Services - $24.79 per hour

EPA assumes that the professional and business services total compensation hourly rate best approximates the respondents to this data collection and further assumes that the total compensation rate of $47.85 per hour would be attributed to a managerial position. To account for labor expended by a professional staff person, EPA approximated a professional total compensation hourly rate by assuming that the professional rate would be about 93% of the managerial rate.[[2]](#footnote-3)

For both the managerial and professional positions, an additional loading factor of 20 percent is applied to total compensation to account for overhead (e.g., personnel services, office space, training, etc). This approach is recommended in recent EPA guidance titled: *Handbook on Valuing Changes in Time Use Induced by Regulatory Requirements and Other EPA Actions* (EPA-236-B-15-001, December 9, 2020). The overhead loading factor is added to total compensation to derive the fully loaded hourly wage. Next, because the nonprofit total compensation rate is from 2014, these estimates are updated to 2020 dollars using the Employee Cost Index (ECI).[[3]](#footnote-4) Table 1 presents the derived loaded hourly wage rates.

Table 1. Derivation of Nonprofit Loaded Hourly Wage Rates

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|   | **Total Compensation1** | **Overhead2** | **Employment Cost Index3** | **Loaded Hourly Wage Rate ($2020)** |
| Managerial | $47.85 | 1.2 | 1.157 | $66.46 |
| Technical4 | $44.50 | 1.2 | 1.157 | $61.81 |
| 1 John L. Bishow and Kristen Monaco, "Nonprofit pay and benefits: estimates from the National Compensation Survey," Monthly Labor Review, U.S. Bureau of Labor Statistics, January 2016, https://doi.org/10.21916/mlr.2016.4.2 Handbook on Valuing Changes in Time Use Induced by Regulatory Requirements and Other EPA Actions (EPA-236-B-15-001, December 9, 2020)3 <https://www.bls.gov/web/eci/eci-current-nominal-dollar.pdf>. Calculated by dividing the 4th quarter2020 ECI by the 1st quarter 2014 ECI.4 Calculated as 93% of the managerial total compensation rate. https://www.bls.gov/web/ecec/ecsuphst.pdf |

Table 2. Estimated Burden and Cost to Respondents

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Respondent Type** | **Estimated Number of Respondents** | **Estimated Responses****per respondent****(i.e., number of standards/****ecolabels submitted for assessment)** | **Unit Burden and Loaded Hourly Wage Rate by Labor Category** | **Total Burden Over ICR Period (Hours)** | **Total Cost Over ICR Period($2020)1** | **Annual Burden (Hours)** | **Annual Cost($2020)2** |
| **Managerial** | **Technical** |
| **Hours** | **Wage ($2020)** | **Hours** | **Wage ($2020)** |
| Standard/Ecolabel Organizations **previously assessed** per EPA Framework | 20 | 2 | 2.5 | $66.46 | 2.5 | $61.81 | 200 | $12,827 | 66.67 | $4,276 |
| Standard/Ecolabel Organizations **NOT previously assessed** per EPA Framework | 80 | 2 | 6 | $66.46 | 6 | $61.81 |  1,920  | $123,139 | 640 | $41,046 |
| **Total** | **100** | **2** | **--** | **--** | **--** | **--** |  **2,120**  | **$135,966** |  **707**  | **$45,322** |
| 1Total Cost is calculated by multiplying burden hours by the loaded hourly wage rate for each labor category and summing across labor categories, and then multiplying by total number of responses.2 Annual Cost is calculated by dividing the Total Cost over the three-year ICR period by three to account for the fact that data collection activities will occur in each of the three years. Because EPA does not know the exact distribution over the three years, an even distribution of one third each year is assumed. |

## Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

1. **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
2. **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
3. **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

There are no operation and maintenance costs associated with this collection.

## Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

To collect this information, EPA has developed a Framework Submission Template, which provides clear instructions and example sources of evidence.

Table 3 presents the estimated Agency annual burden hours and costs associated with the information collection activities under this ICR. EPA based its burden estimates on the pilot assessment effort. Similar to the respondent burden, EPA assumed that Agency burden will be equally distributed across the three years in the ICR.

Agency wage rate data used to calculate labor costs were gathered from the U.S. Office of Personnel Management Salary Table 2020-DCB, for a GS-14, step 5, employee in the Washington, D.C. area. A loading factor of 1.6 was applied to the base rate to arrive at the 2020 loaded salary of $219,986 per year. The hourly wage rate was computed by dividing the loaded wage by 2,080 hours, the hours associated with a full time employee. This loaded hourly wage rate of $105.76 was used in calculations of Agency cost.

Table 3.Estimated Burden and Cost to the Agency

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Collection Activity** | **Total EPA Burden Over the Three Year ICR Period (Hours)** | **Total EPA Costs Over the Three Year ICR Period ($2020)** | **Annual EPA Burden (Hours)** | **Annual EPA Costs ($2020)** |
| Issue Framework SUBMISSION TEMPLATE to applicant SDOs and ecolabel programs (respondents) | 10 | $1,058  | 3.33 | $353  |
| Follow up with respondents via email/phone | 100 | $10,576  | 33.33 | $3,525  |
| Prepare analysis and report of the assessment results | 800 | $84,608  | 266.67 | $28,203  |
| **Total** | **910** | **$96,242**  | **303.33** | **$32,081**  |

## Explain the reasons for any program changes or adjustments reported in hour or cost burden.

The 2016 pilot, under the previous ICR and Framework, required more time for respondents than had been estimated due to more interest from the potential respondent community and challenges in answering some of the questions. As a result, a number of changes to the criteria/questions, Framework submission template, and process have been made to streamline the effort for respondents. For a detailed explanation of changes made to the Framework, please see *ADDENDUM: Changes in the 2022 Update of the United States Environmental Protection Agency’s Framework for the Assessment of Environmental Performance Standards and Ecolabels for Federal Purchasing* [https://www.epa.gov/system/files/documents/2022-05/updated-framework-addendum\_5-2022.pdf]. The average respondent burden is estimated to be 8.5 hours per response, based on an average 12 hours for respondents that did not previously participate in the pilot and an average 5 hours for respondents that did previously participate in pilot. In addition, the Framework development, testing, refinements, and significant Agency policy development and decision-making were part of the previous Agency cost and burden estimates. The proposed streamlined information collection (e.g., more opportunities for organizations to submit attestations in lieu of documentation) and pre-determined approaches based on the lessons learned from the pilot are anticipated to reduce the burden on respondents and the Agency.

## For collections whose results will be published, outline the plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

There will not be a statistical analysis of the results. Please see the general plan for information collection and public release per EPA’s Recommendations of Specifications, Standards, and Ecolabels for Federal Purchasing under the description of Agency activities.

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

Not applicable.

## Explain each exception to the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”

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

# Supplemental Information

This collection of information is approved by OMB under the Paperwork Reduction Act, 44 U.S.C. 3501 et seq. (OMB Control No. 2070-0199). Responses to this collection of information are voluntary for certain persons, as specified at 42 U.S.C 13101 and 15 U.S.C.3701. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The public reporting and recordkeeping burden for this collection of information is estimated to be 8.5 hours per response on average. Send comments on the Agency’s need for this information, the accuracy of the provided burden estimates and any suggested methods for minimizing respondent burden to the Regulatory Support Division Director, U.S. Environmental Protection Agency (2821T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

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-OPPT-2014-0838, which is available at [http://www.regulations.gov](https://gcc01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.regulations.gov%2F&data=02%7C01%7CJohnson.Amaris%40epa.gov%7C65c78ba73b1c4704fa3b08d83d5ce864%7C88b378b367484867acf976aacbeca6a7%7C0%7C0%7C637326816523141399&sdata=WOWgcU%2By8oJt6418QKqXD04axE1uaiohF6TecHDjyrE%3D&reserved=0). 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.

For the latest status information on EPA/DC services and docket access, visit https://www.epa.gov/dockets.

# List of Attachments

The attachments listed below can be found in the docket for this ICR or by using the hyperlink that is provided in the list below. The docket for this ICR is accessible electronically through <http://www.regulations.gov> using Docket ID Number: EPA-HQ-OPPT-2014-0838.

|  |  |
| --- | --- |
| **Ref.** | **Title**  |
| 1. | [Pollution Prevention Act, 42 U.S.C. 13101 et seq.](https://www.govinfo.gov/content/pkg/USCODE-2010-title42/pdf/USCODE-2010-title42-chap133.pdf)   |
| 2. | [National Technology Transfer and Advancement Act of 1995, 15 U.S.C. 3701](https://www.govinfo.gov/content/pkg/PLAW-104publ113/pdf/PLAW-104publ113.pdf)  |
| 3. | Information Collection Instrument – Submission Template for the Framework for the Assessment of Environmental Performance Standards and Ecolabels for Federal Purchasing (EPA Form No. 9600-038) |
| 4. | [Framework for the Assessment of Environmental Performance Standards and Ecolabels for Federal Purchasing](https://www.epa.gov/system/files/documents/2022-05/updated-framework_5-2022.pdf) |
| 5. | [ADDENDUM: Changes in the 2022 Update of the United States Environmental Protection Agency’s Framework for the Assessment of Environmental Performance Standards and Ecolabels for Federal Purchasing](https://www.epa.gov/system/files/documents/2022-05/updated-framework-addendum_5-2022.pdf)  |
| 6. | [Recommendations of Specifications, Standards, and Ecolabels for Federal Purchasing](https://www.epa.gov/greenerproducts/recommendations-specifications-standards-and-ecolabels-federal-purchasing) |
| 7.  | Consultations |
| 8.  | Wage Rates |
| 9. | Public Comment: Sustainable Forestry Initiative |
| 10. | Public Comment: Resilient Floor Covering Institute |

1. John L. Bishow and Kristen Monaco, "Nonprofit pay and benefits: estimates from the National Compensation Survey," Monthly Labor Review, U.S. Bureau of Labor Statistics, January 2016, https://doi.org/10.21916/mlr.2016.4 [↑](#footnote-ref-2)
2. This assumption is based on comparison of managerial and professional total compensation rates in the professional and business services sector over the period of 2006 – 2021 (https://www.bls.gov/web/ecec/ecsuphst.pdf). [↑](#footnote-ref-3)
3. BLS, Employment Cost Index, Historical Listing – Volume III National Compensation Survey, Table 1. Employment Cost Index for total compensation1, by occupational group and industry (Seasonally adjusted). https://www.bls.gov/web/eci/eci-current-nominal-dollar.pdf [↑](#footnote-ref-4)