

**From:** [Kinn, Alison](#)  
**Cc:** [Sleasman, Katherine](#); [EPP](#)  
**Subject:** your input re: EPA EPP Program Framework Information Collection Request  
**Date:** Tuesday, March 08, 2022 12:56:04 PM  
**Attachments:** [image001.jpg](#)  
[EPP Framework ICR Consultation Questionnaire 3-2022.doc](#)

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Hello,

On March 1, 2022, the U.S. Environmental Protection Agency (EPA) published a notice in the Federal Register ([87 FR 11462](#)) announcing that EPA intends to submit an existing Information Collection Request (ICR) to Office of Management and Budget (OMB). In compliance with the Paperwork Reduction Act, this document announces the availability of and solicits public comment on the ICR entitled "Assessment of Environmental Performance Standards and Ecolabels for Federal Procurement" and identified by EPA ICR No. 2516.04 and OMB Control No. 2070-0199. This is a reinstatement of a previously issued ICR entitled "Assessment of Environmental Performance Standards and Ecolabels for Federal Procurement." This ICR is being reinstated to assess standards and ecolabels per [EPA's Framework for the Assessment of Environmental Performance Standards and Ecolabels for Federal Purchasing](#), formerly referred to as the Guidelines. EPA's goal in developing this Framework is to create a transparent and consistent approach to selecting product environmental performance standards and ecolabels for inclusion in EPA's [Recommendations of Specifications, Standards, and Ecolabels for Federal Purchasing](#).

In addition to the public comment requested by the notice in the Federal Register, OMB regulations at 5 CFR 1320.8(d)(1) require agencies to consult with potential respondents and data users about specific aspects of an ICR. As part of this required consultation, I am contacting you to solicit your input through the attached questionnaire.

If you have any comments in response to the questions attached, or with respect to any other part of this ICR, please respond by return e-mail by COB on March 24, 2022 or submit your comment to the [docket EPA-HQ-OPPT-2014-0838 via ww.regulations.gov](#). EPA will consider those responses, as well as any public comment received in response to the Federal Register notice identified above, in preparing a final document for OMB review.

Thank you for your time,  
Alison

Alison Kinn Bennett - Senior Advisor  
[Sustainable Marketplace](#) | [Green Building](#) | [Recommendations of Specifications, Standards, and Ecolabels](#) | [Pollution Prevention Financing](#)

U.S. ENVIRONMENTAL PROTECTION AGENCY  
Sustainability & Pollution Prevention Branch - Office of Pollution Prevention and Toxics  
7409M - 1200 Pennsylvania Ave, NW - Washington, DC 20460  
office: 202-564-8859 mobile: 202-834-1512  
[kinn.alison@epa.gov](mailto:kinn.alison@epa.gov)

Pronouns I use: she, her, hers

**Consultation Questions for ICR Renewals**  
EPA ICR No. 2516.04 and OMB Control No. 2070-0199

(1) Publicly Available Data

\$ Is the data that the Agency seeks available from any public source, or already collected by another office at EPA or by another agency?

\$ If yes, where can you find the data? (Does your answer indicate a true duplication, or does the input indicate that certain data elements are available, but that they don't meet our data needs very well?)

(2) Frequency of Collection

\$ Per the Supporting Statement, 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.

\$ Do you have suggestions for the appropriate frequency of initial information collection and/or reassessment per the Framework?

(3) Clarity of Instructions

\$ The ICR is intended to require that respondents provide certain data so that the Agency can utilize them.

\$ Based on the instructions (regulations, PR Notices, etc.), is it clear what respondents are required to do and how to submit such data? If not, what suggestions do you have to clarify the instructions?

(4) Burden and Costs

\$ Are the labor rates accurate?

\$ The Agency assumes there is no capital cost associated with this activity. Is that correct?

\$ Bearing in mind that the burden and cost estimates include only burden hours and costs associated with the paperwork involved with this ICR, e.g., the ICR does not include estimated burden hours and costs for conducting studies, are the estimated burden hours and labor rates accurate? If you provide burden and cost estimates that are substantially different from EPA's, please provide an explanation of how you arrived at your estimates.

\$ Are there other costs that should be accounted for that may have been missed?