

SUPPORTING STATEMENT

1. IDENTIFICATION OF THE INFORMATION COLLECTION

(a) TITLE OF THE INFORMATION COLLECTION

Environmental Education Local Grants Progress Report Form
EPA ICR Number 2731.01, OMB Control Number 2090-NEW

(b) SHORT CHARACTERIZATION

The Environmental Protection Agency's (EPA) Office of Environmental Education (OEE) EE Local Grants Program provides funding to support locally focused environmental education projects that increase public awareness and knowledge about environmental and conservation issues and provide the skills that participants in its funded projects need to make informed decisions and take responsible actions toward the environment.

As a stipulation of the award, recipients are required to submit quarterly progress reports and final reports to the Office of Environmental Education. Starting in 2024, EPA plans to require all active grantees to submit these reports using the Environmental Education Local Grants Progress Report Form. By requiring all EE Grantees to use the reporting template, EPA's Office of Environmental Education will be equipped to gather data on this grant program's outputs, outcomes, the total number of individuals reached, and the total number of underserved communities reached. This information will help EPA ensure projects are on schedule to meet their goals and produce high quality environmental outputs. Additionally, requiring all EE grantees to submit their quarterly and final reports using the proposed template will allow EPA's Office of Environmental Education to track and report the overall impact of this grant program as well as contribute to the Agency's Justice40 reporting requirements more accurately.

2. NEED FOR AND USE OF THE COLLECTION

(a) AUTHORITY/NEED FOR THE COLLECTION

The authority to gather progress performance for assistantship programs is derived from 2 CFR Part 200, "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards." 1

Section 200.329 "Monitoring and reporting program performance," paragraphs (b)(1) and (b)(2) state:

"(1) The Non-Federal entity must submit performance reports at the interval required by the Federal awarding agency or pass-through entity to best inform improvements in program outcomes and productivity. Intervals must be no less frequent than annually nor more frequent than quarterly except in unusual circumstances, for example where more frequent reporting is necessary for the effective monitoring of the Federal award or could significantly

affect program outcomes. Annual reports must be due 90 calendar days after the reporting period; quarterly or semiannual reports must be due 30 calendar days after the reporting period.

Alternatively, the Federal awarding agency or pass-through entity may require annual reports before the anniversary dates of multiple year Federal awards. The final performance report will be due 120 calendar days after the period of performance end date. If a justified request is submitted by a non-Federal entity, the Federal agency may extend the due date for any performance report.

(2) The Non-Federal entity must submit performance reports using OMB-approved government-wide standard information collections when providing performance information. As appropriate in accordance with above mentioned information collections, these reports will contain, for each Federal award, brief information on the following unless other collections are approved by OMB:

(i) A comparison of actual accomplishments to the objectives of the Federal award established for the period. Where the accomplishments of the Federal award can be quantified, a computation of the cost (for example, related to units of accomplishment) may be required if that information will be useful. Where performance trend data and analysis would be informative to the Federal awarding agency program, the Federal awarding agency should include this as a performance reporting requirement.

(ii) The reasons why established goals were not met, if appropriate.

(iii) Additional pertinent information including, when appropriate, analysis and explanation of cost overruns or high unit costs.”

OEE needs these reports to ensure that grants are making progress consistent with their work plans and that grantees have the policies, procedures, specifications, standards, and documentation to produce data of sufficient quality to meet project objectives.

(b) PRACTICAL UTILITY/USERS OF THE DATA

The information provided on Environmental Education Local Grants Progress Report Form will be used by the Regional Environmental Education (EE) Project Officers to monitor grant project development and performance. The reports will be attached to the applicable grantee’s file. The final report information will also be used to rate performance for future grant awards.

3. NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

(a) NON-DUPLICATION

The information a grantee provides in their progress and final reports is unique to each project. Information concerning the status of goals and outputs for each project is not available from any other source.

(b) PUBLIC NOTICE

EPA published a notice for this proposed ICR on November 14, 2022, and requested public comments by January 17, 2023. No comments were received.

(c) CONSULTATIONS

For this ICR action, EPA consulted with nine former EE grantees indicated below:

- Karen Bandhauer, The Recycling Partnership, 970-672-7660
- Kim Gower, Hood Canal Salmon Enhancement Group, 360-275-3575
- John Hanold, Pennsylvania State University, 814-863-0768
- Jeff Powalisz, New England Aquarium, 617-973-5200
- Amanda Rinehart, The Artist Boat, 409-770-0722
- Joellyn Stack, Student Conservation Association, 603-543-1700
- Matt Sudman, Friends of the Chicago River, 312-939-0490
- Roger Tobert, Birmingham Zoo, 205-397-3847
- Gina Van Hekken, Walking Mountains Science Center, 970-827-9725

EPA also consulted with its ten Regional Environmental Education (EE) Coordinators. The Regional EE Coordinators are EPA employees, one in each of the EPA's ten regions who specialize in environmental education and serve as project officers for EE grants. The Regional EE Coordinators and former EE grantees suggested several changes to the form, which were incorporated.

(d) EFFECTS OF LESS FREQUENT COLLECTION

EE grants are usually awarded for two-year project periods. As a stipulation of the EE grant award, a quarterly progress report is completed every 90 days and a final report is submitted no later than 120 days after the expiration or termination of the approved project period. Less frequent reporting could result in project mismanagement. For some Project Officers with many grants to manage, the progress report is the best opportunity to ensure the project is on schedule to meet its goals.

(e) GENERAL GUIDELINES

The EE Local Grants Program Progress Report Form covered in this ICR adheres to OMB general guidelines.

(f) CONFIDENTIALITY

No pledge of confidentiality is given for grantee responses in the EE Local Grants Progress Report Form.

(g) SENSITIVE QUESTIONS

No sensitive questions are asked on the EE Local Grants Program Progress Report Form.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

(a) RESPONDENTS/SIC CODES

Respondents are generally employees of local education agencies, postsecondary schools, local/state education or environmental agencies, and non-profit organizations which support environmental education.

According to the 2002 NAICS codes available at www.naics.com, respondents would fall into one of the following categories:

515111	Radio Networks
515112	Radio Stations
515120	Television Broadcasting
519130	Internet Publishing and Broadcasting and Web Search Portals
611110	Elementary and Secondary Schools
611310	Colleges, Universities, and Professional Schools
611519	Other Technical and Trade Schools
611699	All Other Miscellaneous Schools and Instruction
813312	Environment, Conservation and Wildlife Organizations
813410	Civic and Social Organizations
921150	American Indian and Alaska Native Tribal Governments
921190	Other General Government Support
924110	Administration of Air and Water Resource and Solid Waste Management Programs
924120	Administration of Conservation Programs

(b) INFORMATION REQUESTED

(i) *Data items, including recordkeeping requirements*

A prescribed format for progress reports and final reports is being proposed as outlined in the EE Local Grants Program Report Progress Report Form. Recordkeeping requirements for Federal awards are regulated by 2 CFR Part 200, "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards". Form submissions and related information would be maintained by grantees accordingly. Specifically, Section 200.334 "Retention requirements for records," paragraph 1 states:

Financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award must be retained for a period of three years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient. Federal awarding agencies and pass-through entities must not impose any other record retention requirements upon non-Federal entities.

(ii) RESPONDENT ACTIVITIES

Per the terms and conditions of their award and per authority granted under 2 CFR parts 200 and 1500, grantees are already required to report progress quarterly on their projects as well as report on final project results. EE grantees currently submit quarterly progress reports and final reports to their EPA Regional Project Officers; however, there has been no prescribed format for these reports. A prescribed format is being proposed as outlined in the EE Local Grants Program Report Progress Report Form.

According to the 1995 Paperwork Reduction Act (PRA) definition of burden §3502, the time and effort that the forms require from grantees are:

- (A) Reviewing instructions;
- (E) Completing and reviewing the collection of information; and
- (F) Transmitting.

5. INFORMATION COLLECTED

(a) AGENCY ACTIVITIES

Once the progress report or final report is received by the Regional EE Project Officer, they are attached to the grant file. These reports are also planned for inclusion in an internal system that OEE and its Regional Project Officers use to track and report grant status and program results.

(b) COLLECTION METHODOLOGY

This information collection is form related. The proposed format is outlined in the EE Local Grants Program Report Progress Report Form.

Beginning with grants awarded in FY 2024, EPA anticipates requiring, through the administrative terms and conditions, that the EE grant recipients submit quarterly progress and final reports online via OEE's grant tracking system. For those grants awarded prior to FY 2024, the award recipient has the option of submitting progress reports to the EPA Regional Project Officer electronically (i.e., via the OEE grant tracking system) or emailed to their Regional

Project Officer. Progress reports are due no later than 30 calendar days after the end of each quarterly reporting period if the grant project period was active for any portion of that reporting period. Quarterly reporting periods are standardized across the program and defined as October 1 – December 31, January 1 – March 31, April 1 – June 30, and July 1 – September 31. To reduce burden, EPA asks that grantees use the prescribed form to prepare their progress reports and final reports and build on the data in that form as the project progresses to completion.

Summary results data for the EE Local Grants Program can be found on the program website (<https://www.epa.gov/education/environmental-education-grants-national-statistics>) which is anticipated to be augmented with more robust data from the expanded progress reports.

(c) SMALL ENTITY FLEXIBILITY

The impact of small entities was taken into consideration during the development of the EE Local Grants Program Report Progress Report Form. The number of questions asked is the minimum amount of information needed to ensure projects are on schedule to meet their goals and produce high quality environmental outputs. As well as allow EPA's Office of Environmental Education to track and report accurately the overall impact of this grant program and contribute to the Agency's Justice40 reporting requirements.

(d) COLLECTION SCHEDULE

Table 1 outlines the standardized progress report collection schedule for an EE grant during its active project period plus Agency

Table 1 - Collection Schedule

<i>FORM</i>	<i>SCHEDULE</i>
EE Local Grants Program Report Progress Report Form	<p>For progress reports, if grant project period was active:</p> <ul style="list-style-type: none"> • October 1 – December 31 (Due January 30) • January 1 – March 31 (Due April 30) • April 1 – June 30 (Due July 30) • July 1 – September 31 (Due October 30) <p>Final Report:</p> <ul style="list-style-type: none"> • Due 120 calendar days after project period end date

6. BURDEN ESTIMATE AND COST OF COLLECTION

(a) ESTIMATING RESPONDENT BURDEN

The estimated hours per year for completing this reporting requirement outlined in Table 2 include time for reviewing instructions, completing information and transmitting through email or online. EE grants typically have a two-year project period; so, an EE grantee in any given year will complete an initial quarterly progress report or a final report but not both. EE grantees also typically complete 3 interim progress reports per year.

Table 2 - Estimated Hours for Reporting Requirement

<i>Report Type</i>	<i>Estimated Hours</i>	<i>Frequency per Year</i>	<i>Total Burden Hours</i>
Progress Report (Initial Report)	4	1	4
Progress Report (Interim Reports)	1	3	3
Final Report	4	1	4

(b) RESPONDENT UNIVERSE AND BURDEN

In any given year, EPA estimates 160 active EE grant recipients. EPA estimates 40 EE new grantees each year will be completing their initial quarterly progress report, which will require 4 hours. EPA estimates that 160 new or existing grantees will be completing 3 interim progress reports for their first or second years, which will each require 1 hour. EPA also estimates that 40 existing grantees each year will be completing their final report, which will require 4 hours.

EPA's burden estimate per year is based on the government's fiscal year. In one fiscal year, a grantee that receives an award at the beginning of the year will complete 1 initial progress report and 3 interim progress reports for that grant. In the second year, that same grantee will complete 3 interim progress reports and 1 final report.

Total Number of Responses:

Progress Report (Initial):	40 Respondents x 1 response =	40
Progress Report (Year 1 Interim):	80 Respondents x 3 responses =	240
Progress Report (Year 2 Interim):	80 Respondents x 3 responses =	240
Final Report:	40 Respondents x 1 response =	40
Total =	240	560

Total Burden:

Progress Report (Initial):	40 Responses x 4 hours =	160
Progress Report (Year 1 Interim):	240 Responses x 1 hour =	240
Progress Report (Year 2 Interim):	240 Responses x 1 hour =	240
Final Report:	40 Responses x 4 hours =	160
Total =	560	800

Table 3 summarizes respondent burden.

Table 3 – Respondent Burden

	Respondents	Calc.	Progress Report (Initial)	Progress Report (Year 1)	Progress Report (Year 2)	Final Report	Total
a	<i>Estimated Hours per Response</i>		4	1	1	4	
b	<i>Frequency per Year</i>		1	3	3	1	
	<i>Annual Burden Hours per Response</i>						
c	<i>Type</i>	(a) x (b)	4	3	3	4	
d	<i>Respondents per Year</i>		40	80	80	40	
e	<i>Responses per Year</i>	(b) x (d)	40	240	240	40	560
f	<i>Total Annual Burden Hours</i>	(c) x (d)	160	240	240	160	800

(c) ESTIMATING RESPONDENT COST

Respondent costs consist only of labor. There are no capital, operating and maintenance, or annualizing capital costs incurred by this information collection.

Respondent Wage Rate: $1\$44.72^1 \times 1.50 = \67.08
Environmental Education Local Grants Progress Report Form: $800 \times \$67.08 = \$53,664$

Table 4 summarizes respondent costs.

Table 4 – Respondent Costs

<i>Respondent Costs</i>	<i>Progress and Final Report</i>	<i>Total</i>
Labor Cost	\$53,664	\$53,664
Capital/Start-up Cost	\$0	\$0
Operating and Maintenance	\$0	\$0
Annualizing Capital	\$0	\$0
Total Costs	\$53,664	\$53,664

(d) ESTIMATING AGENCY BURDEN AND COST

¹ ¹ \$44.72 represents the average wage rate of several occupations expected to apply for grants or fellowships. 1.50 represents a 50% rate for benefits. \$67.08 represents the average fully burdened wage rate, including benefits. These figures are derived from Tables 2, 3, and 4. Educational Services: Junior colleges, colleges, and universities industry group found in the Bureau of Labor Statistics Economic News Release, "Employer Costs for Employee Compensation – December 2022."

To estimate the annual cost and burden to the Regional EE Project Officers, EPA assumes that there are 160 existing grants active in any single fiscal year, 40 new grants are awarded each year, 40 grants each year will complete their project period, all grant project periods are 2 years long, and grants are distributed equally about the 10 EPA Regions. EPA further assumes that:

- 40 new grantees will submit an initial quarterly progress report each year,
- 160 new and existing grantees will submit 3 interim quarterly progress reports each year, and
- 40 outgoing grantees will submit a final report each year.

EPA estimates that it should take each of the 10 Regional EE Project Officers 2 hours to review/upload each initial quarterly progress report or final report and 1 hour to review/upload each interim quarterly progress report. EPA estimates that each of the 10 Regional EE Project Officers will review 4 initial quarterly progress reports, 4 final reports and 16 interim quarterly progress reports each year. Each Regional EE Project Officer will spend annually $16 \times 1 = 16$ hours reviewing / uploading interim quarterly progress reports, $4 \times 2 = 8$ hours reviewing / uploading initial quarterly progress reports, and $4 \times 2 = 8$ hours reviewing / uploading final reports.

Assuming a fully burdened hourly rate of \$66.08¹ for each Regional EE Project Officer, the cost to review / upload submissions is $640 \times \$66.08 = \$42,291.20$

Table 5 summarizes Agency burden.

Table 5 – Agency Burden

	EPA Regional EE Project Officers	Calc.	Progress Report (Initial)	Progress Report (Year 1)	Progress Report (Year 2)	Final Report	Total
a	<i>Estimated Hours per Submission (Review/Upload)</i>		2	1	1	2	
b	<i>Frequency per Year</i>		1	3	3	1	
c	<i>Annual Burden Hours per Submission Type</i>	(a) x (b)	2	3	3	2	
d	<i>Grants Subject to EPA Review / Upload per Year</i>		40	80	80	40	

¹ The 2023 average hourly rate for a General Schedule (GS) 13, Step 1 with Rest of U.S. Locality Pay (\$47.20) was used to estimate burden costs for EPA's Regional EE Project Officers. This rate was also fully burdened (x 40 %), yielding a wage rate of \$66.08.

e	<i>EPA Reviews / Uploads per Year</i>	(b) x (d)	40	240	240	40	560
f	Total Annual Burden Hours	(c) x (d)	80	240	240	80	640

Table 6 summarizes Agency costs.

Table 6 – Agency Costs

<i>EPA Costs</i>	<i>Progress and Final Report</i>	<i>Total</i>
Labor Cost	\$42,291	\$42,291
Capital/Start-up Cost	\$0	\$0
Operating and Maintenance	\$0	\$0
Annualizing Capital	\$0	\$0
Total Costs	\$42,291	\$42,291

(e) BOTTOM LINE BURDEN HOURS AND COSTS

Table 7 – Summary Burden Hours and Costs

	<i>Total</i>
Total Annual Responses	560
Total Burden Hours for Respondents	800 hours
Total Burden Hours for EPA	640 hours
Total Respondent Cost	\$53,664
Total EPA Cost	\$42,219

(f) BURDEN STATEMENT

The public reporting and recordkeeping burden for this collection of information is estimated to average 1.75 hours per response. Specifically, the estimate is 4 hours per each initial progress report, 1 hour per each of the estimated 6 interim progress reports, and 4 hours per each final report ($14/8 = 1.75$). Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. 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 OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

The burden for the Environmental Education Local Grants Progress Report Form is based on time for reviewing instructions, collecting the information as well as entering it into the form, and transmitting on-line (via planned OEE tracking system) or through email. For the initial progress report and the final report, both completed once per project, the combined respondent burden is 8 hours. EE grant recipients also typically complete 3 interim progress reports per year, with an estimated combined annual burden of 3 hours. EE grants typically have a two-year project period; so, EE grantees typically complete 6 interim progress reports. Therefore, the total estimated annual burden is 7 hours, and the estimated total burden for a typical EE grantee during the entirety of their project is 14 hours.

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-AO-2022-0729, which is available for online viewing at www.regulations.gov, or in person viewing at the Office of Environmental Information Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Office of Environmental Information Docket is (202) 566-1752. An electronic version of the public docket is available at www.regulations.gov. 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. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-AO-2022-0729 and OMB Control Number 2090-NEW in any correspondence.