

Section 1: Part A of the Supporting Statement

A.1 Identification of the Information Collection

A.1.a Title of the Information Collection Request

The title of this information collection request (ICR) is *Revision to the Information Collection Request for the 2020 Drinking Water Infrastructure Needs Survey and Assessment (DWINSA)*. The Office of Management and Budget (OMB) control number for this ICR is 2616.02; EPA ICR Number 2040-NEW.

A.1.b Short Characterization

The purpose of this information collection revision is to better identify the presence of lead service lines (LSLs) in states across the country. EPA's Office of Ground Water and Drinking Water already collected data to comply with sections 1452(h) and 1452(i)(4) of the Safe Drinking Water Act (42 U.S.C. 300j-12) and the America's Water Infrastructure Act (AWIA) of 2018. This revised data collection effort will only include updates to the LSL counts of the 2020 State DWINSA. For the LSL count update, EPA will collect and evaluate the number of LSLs for water systems that are in all 50 states, the U.S. territories (Guam, U.S. Virgin Islands, Northern Mariana Islands, and American Samoa), Puerto Rico, and the District of Columbia. EPA will use an abbreviated version of the original DWINSA 2020 LSL questionnaire to collect LSL counts from previously surveyed water systems. Participation in the one-time update is voluntary. Service line information is rapidly developing as states and water systems develop inventories required under the Lead and Copper Rule Revisions. This one-time update of the LSL questionnaire will allow water systems and states that provided incomplete submissions to the original LSL questionnaire or are still working on their LSL inventories to provide additional information to the data collected in 2021, resulting in a BIL lead service line replacement (LSLR) allotment that reflects a more current understanding of the states' needs. As mandated by section 1452(a)(1)(D)(ii) of the Safe Drinking Water Act, EPA intends for the update to impact the LSLR allotments starting in FY2024 (i.e., 3rd year of BIL funding). In order to complete data collection within this timeframe, the service line count update must be conducted as an emergency revision to the original ICR.

A.2 Need for and Use of the Collection

A.2.a Authority and Need for the Collection

EPA is conducting this revision to the 2020 DWINSA pursuant to its authority described in this section (Part A, Section 2.a) of the supporting statement of the original 2020 DWINSA ICR. Data from the 2020 DWINSA collection request were used to calculate allotments of the Drinking Water State Revolving Fund (DWSRF) Bipartisan Infrastructure Law (BIL) Lead Service Line Replacement funding to states.

This one-time LSL count update is required because states expressed interest in a one-time update of the LSL questionnaire to reflect that service line information is rapidly changing as states and water systems develop inventories required under the Lead and Copper Rule Revisions. To accommodate the states' request, this one-time DWINSA LSL count update will allow water systems and states that provided incomplete submissions to the original LSL questionnaire or are still working on their LSL inventories to provide additional information to the data provided in 2021. This will result in a BIL LSLR allotment that reflects a more current understanding of the states' needs.

A.2.b Use and Users of the Information

The results of the one-time LSL count update for the DWINSA will be used as a basis for allocation of the DWSRF BIL LSLR funding among states starting with FY2024. EPA will also use data collected to update estimated state and national LSL counts.

Respondents will provide updated information on the material (i.e., lead, galvanized, non-lead) of service lines and connectors, to the best of their knowledge. EPA will use this information to model the updated distribution of LSLs throughout the country.

A.3 Non-duplication, Consultations, and Other Collection Criteria

The following sections verify that this information collection satisfies the OMB's non-duplication and consultation guidelines and does not duplicate another collection.

A.3.a Non-duplication

To the best of EPA's knowledge, up-to-date state-by-state water system data on water systems' LSL counts are not available from any other single source. This revised DWINSA data collection effort will provide more accurate and current LSL information than previous ICRs, and therefore, it will not be duplicative.

A.3.b Public Notice Required Prior to ICR Submission to OMB

EPA is requesting an emergency approval of this ICR because EPA intends for the update to affect the BIL LSLR allotments starting in FY2024 (i.e., 3rd year of BIL funding). To achieve this timeline, questionnaires will need to be sent to states in August 2023, with data collection occurring from September to November 2023. This would allow the final release of the FY2024 BIL LSLR allotments in early 2024.

A.3.c Consultations

EPA has engaged states for input on details of the process for the one-time LSL count update through workgroups and water sector association meetings. In April 2023, EPA conducted a preliminary discussion with states at the SRF State/EPA Workgroup meeting. In May 2023, EPA held a meeting of the DWINSA workgroup and a call with Association of State Drinking Water Administrators (ASDWA) and Council of Infrastructure Financing Authorities (CIFA), where participants discussed EPA's methodology for projecting LSL counts, the proposed plan for the one-time LSL count update, the LSL inventory guidance, and the different methods for collecting data.

This one-time LSL count update to 2020 DWINSA is a request from the states, many of whom felt the quality of data for LSL counts has improved since the 2020 DWINSA data collection timeframe.

A.3.d Effects of Less Frequent Collection

EPA originally intended the 2020 DWINSA to be a single collection. However, some data for LSL counts was incomplete at the time of data submission for some states. This potentially affected the amount of funding the states received through the BIL LSLR allotments. By allowing this one-time update to the

2020 DWINSA to collect more data on LSL occurrence, the BIL LSLR allotment will reflect a more current understanding of the states' needs

A.3.e General Guidelines

The one-time LSL count update for the 2020 DWINSA does not violate any guidelines for information collection activities specified by OMB. See this section (Part A, Section 3.e) of the original 2020 DWINSA ICR for more details.

A.3.f Confidentiality Questions

This information collection does not require the respondent to disclose any confidential information. Respondents are not obliged to respond to this strictly voluntary information collection. Further, respondents could eliminate any confidential business information from their reply.

A.3.g Sensitive Questions

The LSL revision to the 2020 DWINSA does not ask sensitive questions.

A.4 Respondents and Information Requested

A.4.a Respondents/NAICS Codes

The respondents of this ICR revision are the same as the surveyed water systems for the LSL questionnaire of the original ICR. See this section (Part A, Section 4.a) of the supporting statement for the ICR for the original 2020 DWINSA for more information.

A.4.b Information Requested

EPA will collect updated information on LSL counts from water systems. The previously provided information for the LSL questionnaire for the 2020 DWINSA will be given back to states and water systems, and they will be asked to update the information if they have new/additional LSL count data. Ownership information and costs will not be collected for this update.

Unlike the original 2020 DWINSA information collection, updated LSL counts for tribal water systems will not be collected during this one-time update. This is because the Drinking Water Infrastructure Grant Tribal Set Aside is mandated by statute and Tribal allotments are not determined by DWINSA data as is mandated for state allotments. The data items for the LSL questionnaire and the respondent activities will be the same as those outlined in the original ICR. See this section (Part A, Section 4.b) of the supporting statement for the ICR for the original 2020 DWINSA for more information.

A.5 Agency Activities, Methods, and Information Management

A.5.a Agency Activities

Since this is a revision to the 2020 DWINSA, many of the Agency activities have already been completed or are identical to earlier activities. For details on activities already completed, see the corresponding

section of the original 2020 DWINSA ICR (Part A, Section A.5.a). The following text only describes the additional work being done specific to this ICR revision.

Many of EPA activities described here will be conducted by contractors with EPA's oversight/technical direction. For example, EPA will oversee contractor acceptance of survey submissions and subsequent data analysis. For purposes of describing Agency activities related to the LSL count update of the 2020 DWINSA, contractor effort is not distinguished from the EPA effort. Separate estimates for contractor burden and cost are provided in Section A.6.f.

Up-Front Activities

Many up-front activities from the original ICR (e.g., training, selecting respondents, etc.) will not need to be conducted, as the work previously done still applies. The following pre-assessment activities for the LSL one-time update will be conducted:

- **Revise the data collection instrument.** EPA is streamlining the LSL questionnaire to clarify instructions, remove the ownership questions and remove the request for cost data.
- **Send data collection instruments.** This will include sending the LSL questionnaire packages via e-mail to the states and water systems. The LSL questionnaire packages will include the prepopulated LSL data for each water system selected in the 2020 DWINSA, instructions, and a cover letter from EPA.

Data Collection Activities

EPA will conduct the same activities during the data collection phase of the one-time LSL count update for the 2020 DWINSA as were done during the original 2020 DWINSA. Details can be found in the corresponding section of the 2020 DWINSA ICR (Part A, Section 5.a).

A.5.b Collection Methodology and Management

EPA will conduct the same collection methodology and management during the data collection phase of the one-time LSL count update for the 2020 DWINSA as were done during the original 2020 DWINSA. Details can be found in the corresponding section of the 2020 DWINSA ICR (Part A, Section 5.b).

A.5.c Small Entity Flexibility

In designing the one-time LSL count update for the 2020 DWINSA methodology, EPA has taken the same approach as in the original 2020 DWINSA and recognizes small systems limited technical capabilities and financial resources. For more information, see this section of the original 2020 DWINSA ICR (Part A, Section 5.c).

A.5.d Collection Schedule

The current schedule assumes EPA would receive OMB approval for data collection by July 2023. The schedule will be adjusted based on the final approval date. EPA will send data collection instruments to states as soon as possible after OMB approval. All systems serving more than 3,300 persons participating in the one-time LSL count update for the 2020 State DWINSA will be asked to complete and return the LSL questionnaire to their state between September and November 2023. Exhibit A-5-1 summarizes the major collection milestones.

Exhibit A-5-1 Collection Schedule

Task	Date
EPA Engages States for Input on Process	April – May 2023
Information Collection Request and Federal Register Notice Published (No Comment Period)	July 2023
Electronic Delivery of Data Collection Instruments to States	August 2023
Systems Update Data with States	September – November 2023
States QA/QC Data and Submit to EPA	November 2023
EPA Analyzes and QA/QCs Data	December – January 2023
EPA Runs Allotment Formula	February 2023
EPA Pre-briefs White House	March 2024
Report to Congress and EPA Releases Final FY2024 BIL LSLR Funding Allotments	April 2024

A.6 Estimating the Burden and Cost

A.6.a Medium and Large Water System Respondent Burden (System)

There were 2,181 medium community water systems (CWSs), 708 large systems and 35 non-profit non-community water systems (NPNCWs) serving 10,000 or more people in the 2020 DWINSA surveyed sample. Across these water system categories there is no substantive difference in the process or data collection instrument being used for the one-time LSL count update and it is assumed that burden will be the same across these categories. The system burden for activities associated with the one-time LSL count update is summarized in Exhibit A-6-1.

Burden for system respondents in these categories includes:

- **Read cover letter email.** EPA anticipates water systems that participated in the 2020 DWINSA will need approximately 10 minutes (0.17 hours) to read the cover letter for the update. It is assumed this will be split evenly between management and technical staff (5 minutes each, 0.085 hours).
- **Call for technical assistance.** Some water systems will call states for technical assistance. In developing the burden estimate for this activity, EPA assumes that the number of requests for assistance will equal 50 percent of the number of water systems. EPA also assumes that each call will be placed by technical staff. EPA assumes that each technical assistance call will average 10 minutes (0.17 hours), for 0.085 hours per system in the sample.
- **Complete and submit data collection instrument to state.** For this update, EPA assumes 50% of the water systems will have no change to their data and require 5 minutes each (0.085 hours) and 50% will update their data and are expected to take up to 15 minutes from technical staff (0.25 hours) for an average of 10 minutes (0.17 hours) per response.
- **Respond to call back from state about status.** For this burden estimate, EPA assumes each water system will spend 5 minutes (0.08 hours) responding to the state call(s) to request a status update on completing the data collection instrument. It is assumed this call will be handled by management.

Exhibit A-6-1 Estimated Average Unit Burden Hours for Water Systems Serving More Than 3,300 Persons

Activity	Management	Technical	Total
	Read intro email/data collection instructions	0.085	0.085
Call for technical assistance		0.085	0.09
Complete data collection instrument		0.17	0.17
Respond to call back from state	0.08		0.08
TOTAL	0.17	0.34	0.51

A.6.b Medium and Large Water System Respondent Burden (State)

This section estimates the state burden for helping EPA conduct the one-time LSL count update. The state burden for activities associated with the CWSs serving more than 3,300 persons and NPNCWSs serving 10,000 or more persons is summarized in Exhibit A-6-2.

Burden for states in these categories includes:

- **E-mail survey package to systems.** Each state will send the survey packet (provided by EPA) to water systems via e-mail. EPA estimates that states will spend a total of 0.05 hours/water system compiling these emails.
- **Provide technical assistance.** In developing a burden estimate for this analysis, EPA assumes that the number of requests for technical assistance will equal 50 percent of the number of water systems. EPA estimates that all questions from these water systems will be readily answerable, requiring only 10 minutes (0.17 hours) per system to answer, or 5 minutes (0.085) when averaged across all surveyed water systems.
- **Call back water systems that do not provide information for the data collection instrument by a certain date.** EPA assumes that the number of these “reminder” calls will equal 100 percent of the water systems. This assumes that most (but not all) will need at least one reminder call and a few will need two or three. The average time for these calls is 5 minutes (0.085 hours) per system.
- **Review completed data collection instrument and submit to EPA.** The data collection instrument will be returned directly to the state for review. EPA estimates that, on average, states will take 15 minutes (0.25 hours) to review each submission and submit to EPA.

Exhibit A-6-2 State Unit Burden for Water Systems Serving More Than 3,300 Persons

Activity	Estimated Burden (hours per system)
E-mail surveys to water systems	0.05
Provide technical assistance	0.085
Call back water systems that do not return the data collection instrument by a certain date	0.085
Review completed assessment forms and documentation	0.25
TOTAL	0.47

A.6.c Small Water System Respondent Burden (System)

Exhibit A-6-3 shows the unit burden for small water systems. EPA will conduct data collection for the 606 small CWSs serving 3,300 and fewer persons and 99 NPNCWs serving fewer than 10,000 persons. It is assumed that since these water systems generally have fewer service lines that the burden will be slightly less than for medium and large water systems. EPA will email the surveys to the small water systems.

- **Read cover letter email.** EPA anticipates water systems that participated in the 2020 DWINSA will need approximately 10 minutes (0.17 hours) to read the cover letter for the update. It is assumed this will be performed by technical staff.
- **Call for technical assistance.** EPA assumes that the number of requests for technical assistance from small water systems will equal 50 percent of the number of water systems. EPA estimates that all questions from these water systems will be readily answerable, requiring only 10 minutes (0.17 hours) per system to answer, or 5 minutes (0.085) when averaged across all surveyed water systems.
- **Complete and submit data collection instrument to EPA.** For this update, EPA assumes 50% of the water systems will have no change to their data and require 5 minutes each (0.085 hours) and 50% will update their data and are expected to take up to 10 minutes from technical staff (0.17 hours) for an average of 7.5 minutes (0.125 hours) per response.

Exhibit A-6-3 Estimated Average Unit Burden Hours for CWSs Serving Less Than 3,300 Persons and NPNCWSs Serving <10,000 Persons

Activity	Management	Technical	Total
	Read cover letter/data collection instructions		0.17
Call for technical assistance		0.085	0.09
Complete data collection instrument		0.125	0.13
TOTAL			0.38

A.6.d Small Water System Respondent Burden (State)

EPA will facilitate completion of small water system LSL questionnaire updates. There is no state burden incurred for data collection from these systems.

A.6.e Bottom Line Estimates

Exhibits A-6-4 and A-6-5 summarize the bottom-line burden hours and costs for CWSs, NPNCWSs and states for this collection. The total respondent burden is 3,118.80 hours at a cost of \$194,265.30 in 2019\$.

Exhibit A-6-4 Bottom Line Respondent Medium and Large Water System Burden (2019\$)

Respondent Type	Number of Systems	Burden Hours	Total Cost
Medium and large water systems	2,924	1,476.62	\$95,925.48
States		1,374.28	\$82,003.29
TOTAL		2,850.90	\$177,928.76

Exhibit A-6-5 Bottom Line Respondent Small CWS and NPNCWS serving <10,000 (2019\$)

Respondent Type	Number of Systems	Burden Hours	Total Cost
Small and NPNCWS water systems serving <10,000	705	267.90	\$16,336.54
States		0	0
TOTAL		267.90	\$16,336.64

A.6.f Agency Burden

EPA made the following assumptions in developing its estimate of Agency and contractor burden and cost¹:

EPA Headquarters

- Over the 6-month project period, EPA Headquarters will expend a total of 0.5 FTEs. Assuming 2,080 hours per year, this equates to 1,040 hours.
- The average salary and benefits (i.e., personnel compensation and benefits [PC&B]) of the FTEs is at the GS 13, Step 5 level of \$179,829. Assuming 2,080 hours per year, this equates to \$86.46 per hour.

EPA Contractor(s)

- Over the 6-month project period, EPA contractor(s) will expend a total of 3,629 hours of direct labor.
- The EPA contractor(s) will provide this professional labor at a total hourly rate, including all applicable indirect costs, of \$93.84.

¹ Hourly rates are from U. S. Office of Personnel Management, 2019 General Schedule (GS) Locality Pay Tables (<http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2019/general-schedule/>) and overhead rates are from *Information Collection Request for Public Water Supply Program*, December 20, 1993.