

Supporting Statement for an Emergency Information Collection Request (ICR) Under the Paperwork Reduction Act (PRA)

EXECUTIVE SUMMARY

Identification of the Information Collection – Title and Numbers

Title: Clean School Bus (CSB) Rebates Program: Application and Close-out Forms

EPA ICR No.: 2780.01

OMB Control No.: 2060-NEW

Docket ID No.: EPA-HQ- OAR-2012-0103

Abstract

This supporting statement is for an emergency Information Collection Request (ICR) for the Clean School Bus (CSB) Rebates Program. The CSB Rebates Program currently collects information under an existing ICR; namely the Diesel Emissions Reduction Act (DERA) and Clean School Bus (CSB) Rebate Program ICR No. 2060-0686. The Environmental Protection Agency currently uses ICR No. 2060-0686 to collect information for the CSB Program, but the Agency now needs additional information to ensure successful administration and management of the Clean School Bus Program. This ICR is requesting emergency clearance to cover these additional components. Within six months of approval, EPA intends to submit a revision ICR under the base control number to consolidate all components of this collection.

EPA uses approved procedures and forms to collect necessary information to operate a rebate program and has been providing rebates under CSB since 2022. EPA is preparing to launch the 2023 CSB Rebate Application for new potential applicants, as well as launch the 2022 CSB Rebate Close-out Form for existing program participants. EPA is requesting an emergency ICR for additional data to be collected on the 2023 Application and 2022 Close-out Form; these additional data are needed to operate the rebate program as authorized by Congress under the CSB statute. Additionally, new data fields in the Application and Close-out Form are needed for EPA to verify that rebate recipients use the program funds consistent with program requirements, and to gather performance data that can inform future research and policy decisions.

Summary Total Burden and Costs¹

For estimating public burden for the additional information in the application, EPA based estimates on knowledge of the existing application. The additional information being collected in the application is not expected to vary meaningfully by number of buses

¹ An average is shown since the number of buses per application will range between 1 and 25.

requested, and thus EPA is presenting a single estimate for the Application incremental information.

For the Close-Out Form, EPA has taken into account the fact that the amount of time necessary to complete additional data fields in the Close-Out Form will vary based on the number school buses a participant request. In the CSB Rebate Program, participants may select from 1 to 25 buses, and thus EPA has taken the average of the total burden hours and costs for program participants selecting the minimum number of buses (n = 1) and participants selecting the maximum number of buses (n=25). Given the relationship between the number of buses a participant selects and the burden to complete the data fields, EPA contends that an average hour and cost accurately identifies the burden to program participants completing the Close-Out Form. EPA then took the sum of burden for hours and costs for the additional information in the Application and the Close-out Form.

The EPA expects to have approximately 2,799 (estimated) respondents and 3,599 responses associated with this Emergency ICR that will account for approximately 7,397 total burden hours at a cost of \$411,832. EPA will reevaluate and reconsider burden estimates within six months when DERA/CSB ICR No. 2060-0686 is renewed.

Information Collection	Estimated Total Number of Respondents	Estimated Total Number of Responses	Burden (hours)	Total Cost (2022\$)
Total Average Burden for Application (New Data Fields Only)	2,400	3,200	4,800	\$273,015
Total Average Burden for Close-out Form	399	399	2,597	\$138,816
SUM of Burden for Additional Data Fields in Application and Close-out Form	2,799	3,599	7,397	\$411,832

SUPPORTING STATEMENT

1. 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.

This emergency ICR is necessary to ensure that all essential information on CSB Rebate Application and Close-out Forms can be collected. This data is needed to ensure that activities are completed in accordance with statutory requirements and program guidance. In addition, the information is necessary to ensure fiscal control and accountability for EPA funds, as well as to deter waste, fraud, and abuse.

Under 42 U.S.C. § 16091(b)(8), EPA is required to submit to Congress a report evaluating the implementation of the CSB. Congress requires EPA to annually report on the number of applicants, quantity and number of rebates, location of awards, details regarding the buses being replaced, as well as the new buses that replace them, electric charging infrastructure (for electric buses only), and the criteria used to select recipients for the CSB program. To accurately provide this information to Congress and to appropriately administer the CSB program, EPA requires the collection of additional information on two rebate forms: 1) the Application, and 2) the Close-out Form. The additional information on the Application is necessary to accurately determine the amount of funding the applicant is requesting and to ensure all parties involved in the potential new bus deployment project are in alignment on project planning. The additional information on the Close-out Form is necessary to accurately understand organization identification, fleet size, disposition of replaced buses, replacement bus characteristics including information on batteries and warranties, electric charger details, proof of delivery/installation/invoices, and contact information for telematics data (if voluntarily provided) to gather performance related data that can inform future research and policy decisions.

2. 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.

The purpose of the CSB Program's Application and Close-out Form is to verify that rebate recipients are qualified, eligible, and use the Clean School Bus Rebate program funds to purchase approved zero-emission school buses, clean school buses, and/or electric vehicle supply equipment (EVSE). EPA is adding several data fields to the existing Application and Close-out Form via this emergency ICR.

Additional Application Information

As summarized immediately below, new Application data fields would collect information in three areas: 1) funding amounts, 2) partnership agreements, and 3) existing bus details.

Additional information on the amount of funding applicants are requesting would allow EPA to better utilize CSB program funding across a greater number of applicants. Information on the amount of funding requested includes three checkboxes for applicants to indicate: 1) if they are requesting lower levels of funding than they are eligible for (i.e., are able to utilize non-EPA funds or otherwise negotiate lower equipment costs), 2) if they are they are requesting an American Disabilities Act (ADA) compliant bus, and 3) if they are request funds to ship one or more buses to non-lower 48 states and territories. The first checkbox (request lower funding levels) would allow EPA to fund a greater number of buses and potentially help decrease bus prices (a key goal of the Administration). The second checkbox (ADA compliant bus) would allow EPA to allocate additional funding for applicants serving a disabled school age population since the ADA compliant features result in higher bus prices. Similarly, the third checkbox (shipping buses to non-lower 48 states and territories) would allow EPA to allocate additional funds since shipping costs to these locations can be substantial.

Additional information on partnership agreements includes up to three brief agreement memorandums for applicants to upload into the web-based application, as well as one checkbox. The three memorandums are: 1) utility planning, 2) school board notification, and 3) third-party verification. The purpose of these three memorandums is to ensure that 1) all applicants acknowledge the importance of engaging with their local utility early in the planning process for electric school bus deployment; 2) all applicants certify school board awareness of and support to pursue the new bus project; 3) third party applicants certify that they have approval to apply on behalf of school districts. Finally, the checkbox (workforce training) would allow applicants to indicate awareness of program requirements for electrician training and the importance of developing a workforce development plan, since appropriately supporting workforce development is a critical goal of the CSB program and the Administration more broadly.

Additional information on existing buses that applicants are requesting funds to replace includes a checkbox per bus line item to attest to meeting the eligibility requirements for an exception to the scrappage requirement for the CSB Rebate Program.

Additional Close-Out Form Information

Separate from the application form, EPA needs to add data fields to the Close-out Form that the subset of applicants selected for funding complete at the end of the new bus deployment project. The additional Close-out form data fields collect addresses for organizations where buses are scrapped, donated or sold; old bus owners; replacement bus owners; infrastructure owners; infrastructure suppliers; and other infrastructure installers. This information will enable EPA to contact organizations involved in the CSB program to validate and certify information submitted, as needed (e.g., for site inspections conducted by EPA's Office of Inspector General). The new fields also

collect current fleet sizes so EPA can evaluate what impact the program has on emissions at the school bus fleet level. The new fields also collect the odometer readings of old buses so EPA can determine emissions reductions achieved by the replacement of these buses.

Estimates of replacement bus mileage and fuel consumption (if propane/CNG), range and battery capacity (if electric) are newly collected to allow EPA to better understand performance measures of new equipment and assist in future policy making decisions. EPA is newly collecting data on how many applicants have obtained bi-directional chargers to better understand whether and how to include vehicle-to-grid and related charging in future funding opportunities under the CSB Program.

Data on annual idling hours for replacement buses are newly collected to assist EPA in determining the environmental benefits of replacement buses. The new fields also capture whether buses have auxiliary heaters that vent outside, which can cause air pollution.

Battery and powertrain warranty information is newly collected to help EPA better understand battery lifespan and whether the program goal of five years of operability of equipment paid for by the program can be met.

The Close-out Form includes a new field for the number of plugs per EVSE, which EPA can use to assess consumer demand for multi-plug EVSEs. To verify the purchase of clean buses, rebate recipients must upload copies of final invoices, proof of delivery, and photos of installed EVSEs.

To aid future policymaking and to better understand how replacement buses are used and compare bus performance across different environmental terrains, a new field is included asking the rebate recipient if they would be willing to voluntarily submit telematics data from the replacement buses to EPA.

3. 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.

CSB Program Rebate participants enter data directly into the Application or Close-out Form depending on what stage of the rebate process they are in (i.e., applying, selected for funding, and closing out the project). The Application and Close-out Form are in a webform application with a user-friendly interface. The webform ensures that all required data fields are completed. The design and use of this webform reduces the burden on rebate recipients and EPA staff by auto-populating information throughout

the application process among the necessary rebate forms (e.g., information in the Application is carried through to the Close-out Form). The webform thus significantly reduces the burden on rebate recipients and EPA Staff. EPA will use the new Application and Close-out Form data fields in addition to the existing data fields to fulfill the reporting requirements of the CSB program. EPA will store the information entered into the Application and Close-out Form in the same database used to store data collected under the current ICR (ICR No. 2060-0686).

4. 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.

Information requested from respondents under this emergency ICR is not available from other sources. There are no existing rebate programs at EPA where this information may have been previously collected. Some rebate recipients may have applied for and received grants from EPA; however, information currently held in EPA's Integrated Grants Management System that could pertain to the current rebate program may not reflect current contact information for rebate recipients and would not include the necessary information related to the specific vehicle(s) targeted for rebate funding. Where possible, EPA will look to allow applicants applying to multiple rebate funding opportunities under the CSB Program to utilize relevant information (e.g., applicant contact information) when applying to a future rebate funding program.

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

The Application and Close-out Form collect minimal information needed to verify that rebate recipients are eligible for Clean School Bus award, experience a fair and equal selection process, and that applicants use the funds received to purchase approved clean school buses and/or EVSE; the information then allows EPA to assure compliance with statutory and program requirements. The burden represented by the Application and Close-out Form cannot be further reduced for small businesses. EPA needs certain basic information to make decisions regarding rebate payments, and this basic information is not dependent on an operator's size. Rebate recipients submit a Close-out Form to demonstrate that all program requirements have been met. EPA believes the reporting requirements included in this emergency ICR do not place an unreasonable burden on small businesses. In general, CSB rebates offer a simpler funding mechanism for small entities compared to the processes involved in many federal grants.

Additionally, EPA minimizes the burden on small entities by providing User's Guides for the Application and Close-out Form. The EPA will update [Clean School Bus Application User Guide](#) with added fields. Similarly, EPA is currently developing a Clean School Bus

Close-out Form User Guide, which will reflect added fields; this User Guide will be like the Application User Guide.

6. 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.

EPA recognizes the importance of balancing the need for data collection efforts against respondent burden and costs and strives to minimize burden. Without the information collected via the new data fields in the Application, EPA will be unable to appropriately allocate funding and ensure that all parties involved in the potential new bus deployment project are in alignment on project planning, as well as appropriately verify information about existing buses to be replaced. Without the information collected via the new data fields in the Close-out Form EPA will be unable to verify that rebate recipients used the program funds consistent with program requirements, and will be limited in gathering data that will be used to evaluate the implementation of the CSB statute for Congress, as well as to inform future research (e.g., quantifying emission reduction benefits of the program and estimating CSB performance in the field) and policy decisions (e.g., improving the cost-effectiveness of rebate funds). These data fields will be submitted one time for each rebate funding opportunity; therefore, a less frequent collection is not applicable.

7. 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.**

Rebate recipients must retain all financial records, supporting documents, accounting books and other evidence of Rebate Program activities for three years after submission of the close-out report. If any litigation, claim, or audit is started before the expiration of the three-year period, the recipient must maintain all appropriate records until these actions are completed and all issues resolved.

8. 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.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

EPA developed estimates of the time it would take to provide the required information based on existing knowledge of applicants along with the application and close-out process. Specifically, for the additional data fields in the Application, EPA based estimates on knowledge of the existing application, as well as burden associated with completing checkboxes and uploading forms. For the additional data fields in the Close-out Form, EPA consulted with individuals who have a similar level of knowledge as those who would be filling out the Close-Out Form and ensured that the individuals completed the Close-out Form for the minimum (1) and maximum (25) number of buses to appropriately account for the relationship between the number of buses requested and burden.

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

Not applicable.

10. 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 system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

Applicants will not be required to submit confidential business information. If an applicant feels that any information requested would be confidential business information, the applicant may request that such information be treated as confidential. All confidential data will be handled in accordance with 40 CFR 122.7, 40 CFR Part 2, and EPA's *Security Manual* Part III, Chapter 9, dated August 9, 1976. Any claim of confidentiality must be asserted at the time of submission.

11. 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.

No information of a sensitive or private nature is requested in conjunction with these information collection activities, and these information collection activities comply with the provisions of the Privacy Act of 1974 and OMB Circular A-108.

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

- a) **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.**
- b) **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**

- c) 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'.**

The new data fields on the Clean School Bus Application that are covered by this emergency ICR include:

- Checkboxes Related to Funding Amount:
 - o Cost Share acknowledgement: certification that the applicant will identify other external funds that offset cost of electric school buses or supporting infrastructure, and thus is applying for a lower funding amount than eligible for
 - o American Disabilities Act (ADA) equipment: indicating installation of ADA Equipment by bus line item
 - o Shipping bus(es) to non-lower 48 states and territories: indicating funds are needed to ship one or more buses to non-lower 48 states and territories
- Partnership Agreements
 - o Document one (Utility Agreement): acknowledges and certifies utility planning requirements and coordination
 - o Document two (School Board Agreement): applicant certifies school board is aware of the applicant pursuing the new bus project.
 - o Document two (third party Vendor only): certifies that served school district is aware of third party applying on behalf of the served school district.
 - o Labor/Workforce training: (Checkbox) allow applicants to indicate awareness of program requirements for electrician training and the importance of developing a workforce development plan
- Existing Buses to Be Replaced
 - o Scrappage: checkbox per bus line item to attest to meeting eligibility requirements for an exception to the scrappage requirement for the CSB Rebate Program.

The new data fields on the Close-out Form that are covered by this emergency ICR include:

- Organization and point of contact (name, title, phone number and email) information for the following organizations:
 - o Scrap yards
 - o Organization selling, donating, or scrapping old equipment

- o Organization purchasing, receiving any (old or new) bus and/or infrastructure
 - # of buses in existing fleet that are electric, propane, and/or Compressed Natural Gas
 - The odometer readings of old buses to be scrapped/donated or sold
 - Type of fuel or charger type for new bus to include charger capacity
 - Replacement bus (Propane/CNG) Estimated annual fuel consumption
 - Replacement bus estimated annual mileage
 - Replacement bus estimated idling hours (Propane or CNG)
 - Zero Emission Battery Capacity
 - Electrical Vehicle Supply Equipment (EVSE) and/or is bus capable of Bi-directional or Vehicle-To- Grid (V2G) charging
 - Replacement bus auxiliary heater presence and type (electric, propane, diesel, gas, or other)
 - Replacement bus warranty information to include years and miles covered for powertrain (CNG/Propane & Zero Emission) and Zero Emission bus Batteries to include battery discharge threshold.
 - Awardees utilizing other funding opportunities to include State, Federal, City, Non-profit, and any other type of funding opportunity and includes amount and type of funding used to complete project
 - For infrastructure projects, location (street address, city, county, state, and postal code) of new Electric Vehicle Supply Equipment (EVSE) to include chargers, pedestals and utility meters
 - Willingness to share telematics data with the EPA and/or its affiliates for analysis and use in future policy decisions.
 - Point of Contact (primary and alternate name(s), title, email and phone number) information for voluntary telematics data submission
- New bus EPA Certification or CARB Certification
- New bus Certification number

EPA used its best professional judgment to estimate the amount of time required for state, local and private applicants to fill out the new data fields for the application and Close-out Form. Specifically, as noted above, for the additional data fields and required attachments in the application, EPA based estimates on knowledge of the existing application. For the additional data fields in the Close-out Form, EPA consulted with individuals who have a similar level of knowledge as those who would be filling out the Close-Out Form and ensured that the individuals completed the Close-out Form for the minimum (1) and maximum (25) number of buses to appropriately account for the relationship between the number of buses requested and burden (see Appendix A). Note for the Close-out Form that while 65% of participants have 1-5 buses, a few participants have as many as 25 buses. To reflect this variation, we averaged the total burden of a one-bus applicant and a 25-bus applicant to derive a standard burden entry. The estimated burden is presented in Table 1.

Table 1a: Respondent Burden for State, Local, and Private Entity Burden Calculation for Application (per Response)¹

Task	Contribution of Each Worker to the Task			Estimated Time to Complete (hours)
	Management (hours)	Technical (hours)	Clerical (hours)	
<i>One to 25 Buses Per Applicant</i>				
Review instructions	0.15	0.15	0.10	0.4
Gather information	0.00	0.75	0.00	0.75
Fill out Application (incremental information)	0.25	0.50	0.10	0.85
Record keeping	0.00	0.00	0.00	0.00
Total	0.40	1.4	0.20	2.00

¹Note: The additional information being collected in the application is not expected to vary meaningfully by number of buses requested, and thus EPA is presenting a single estimate for the Application incremental information; as detailed below, responses for the Close-out Form may vary by number of buses requested, and thus EPA has provided an average for participants requesting the minimum and maximum number of buses. EPA will reevaluate and reconsider burden estimates within six months when DERA/CSB ICR No. 2060-0686 is renewed

Table 1b: Respondent Burden for State, Local, and Private Entity Burden Calculation for Close-Out Form (per Response)

Task	Contribution of Each Worker to the Task			Estimated Time to Complete (hours)
	Management (hours)	Technical (hours)	Clerical (hours)	
<i>One Bus Per Approved Applicant</i>				
Review instructions	0.13	0.00	0.49	0.61
Gather information	0.00	0.53	0.70	1.23
Fill out Close Out form (incremental information)	0.34	0.13	0.50	0.96
Record keeping	0.03	0.00	0.24	0.26
Total	0.49	0.65	1.93	3.07
<i>25 Buses Per Approved Applicant</i>				
Review instructions	0.13	0.00	0.49	0.61
Gather information	0.00	2.13	2.00	4.13
Fill out Close Out forms (incremental information)	1.81	0.63	2.00	4.44
Record keeping	0.05	0.00	0.73	0.78
Total	1.99	2.75	5.21	9.95
Total Average burden [(1 bus +25 Bus) / 2]	1.24	1.7	3.57	6.51

To estimate total respondent cost associated with this ICR, Bureau of Labor Statistics (BLS) data on wages and fringe benefits (total compensation) are used. Specifically, wages are estimated for labor types (management, technical, and clerical) for state and local governments and for private fleets. EPA uses average wage data for state and local governments available from the Employer Costs for Employee Compensation for state and local government workers, Table 3 (See

<http://www.bls.gov/news.release/ecec.t03.htm>). EPA uses average wage data for private fleets available from the Employer Costs for Employee Compensation for private industry workers, Table 4 (See <https://www.bls.gov/news.release/ecec.t04.htm>).

Overhead costs are assumed to equal 20% of the sum of wages plus fringe benefits. This loading factor is described in *Handbook on Valuing Changes in Time Use Induced by Regulatory Requirements and other U.S. EPA Actions*.² Table 2 immediately below presents the fully loaded wage rates used in this emergency ICR.

Table 2: State, Local, Private Loaded Wage Rates (2022\$)

Labor Category	Wage ¹	Fringe Benefit ¹	Total Compensation	Overhead % wage ²	Overhead	Hourly Loaded Wages ³	BLS Occupational Group
	(a)	(b)	(c) =(a)+ (b)	(d)	(e)= (c) * (d)	(f)=(c)+(e)	
State & local governments (including schools)							
Managerial	\$43.87	\$24.70	\$68.57	20%	\$13.71	\$82.28	State and Local Government Workers: Management, Professional, and Related
Professional / Technical	\$32.32	\$23.56	\$55.88	20%	\$11.18	\$67.06	State and Local Government Workers: Public Administration
Clerical	\$23.05	\$17.18	\$40.23	20%	\$8.05	\$48.28	State and Local Government Workers: Office and Administrative Support
Private fleets							
Managerial	\$46.70	\$20.55	\$67.25	20%	\$13.45	\$80.70	Service Providing Industries: Management, Professional, and Related Occupations
Professional / Technical	\$22.66	\$10.35	\$33.01	20%	\$6.60	\$39.61	Service Providing Industries: Transportation and Material Moving Occupations
Clerical	\$21.63	\$9.43	\$31.06	20%	\$6.21	\$37.27	Service Providing Industries: Office and Administrative Support Occupations
Footnotes:							
¹ Source:							
State and Local Governments - Bureau of Labor Statistics Economic News Release Table 3. State and local government, by occupational and industry group, December 2022. http://www.bls.gov/news.release/ecec.t03.htm							
Private Fleets - Bureau of Labor Statistics Economic News Release Table 4. Private industry workers by occupational and industry group, December 2022. https://www.bls.gov/news.release/ecec.t04.htm							
² An overhead rate of 20% is used based on assumptions in Handbook on Valuing Changes in Time Use Induced by Regulatory Requirements and other U.S. EPA Actions (EPA, 2020).							
³ Values may not sum due to rounding. Wage rates are rounded to the nearest cent.							

² U.S. Environmental Protection Agency (EPA) (2020). Handbook on Valuing Changes in Time Use Induced by Regulatory Requirements and Other EPA Actions. EPA-236-B-15-001. National Center for Environmental Economics.

Table 3a and Table 3b presents the estimated unit respondent burden hours and costs associated with the new application and Close-out Form, respectively, data fields under this emergency ICR.

Table 3a: Application Form Estimated Unit Burden and Cost to Respondents

Respondent Type/Activity	Hours				Costs (2022\$)			
	Management	Technical	Clerical	Total	Management	Technical	Clerical	Total
<i>One to 25 Bus Per Applicant</i>								
State governments (includes tribal) and Local governments (includes school districts)								
Review instructions	0.15	0.15	0.1	0.4	\$12.34	\$10.06	\$4.83	\$27.23
Gather information	0	0.75	0	0.75	\$0.00	\$50.29	\$0.00	\$50.29
Fill out Application (incremental information)	0.25	0.5	0.1	0.85	\$20.57	\$33.53	\$4.83	\$58.93
Record keeping	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00
Total	0.4	1.4	0.2	2	\$32.91	\$93.88	\$9.66	\$136.45
Private Fleets								
Review instructions	0.15	0.15	0.1	0.4	\$12.11	\$5.94	\$3.73	\$21.77
Gather information	0	0.75	0	0.75	\$0.00	\$29.71	\$0.00	\$29.71
Fill out Application (incremental information)	0.25	0.5	0.1	0.85	\$20.18	\$19.81	\$3.73	\$43.71
Record keeping	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00
Total	0.4	1.4	0.2	2	\$32.28	\$55.46	\$7.45	\$95.19

Table 3b: Close-out Form Estimated Unit Burden and Cost to Respondents

Respondent Type/Activity	Hours				Costs (2022\$)			
	Management	Technical	Clerical	Total	Management	Technical	Clerical	Total
<i>One Bus Per Approved Applicant</i>								
State governments (includes tribal) and Local governments (includes school districts)								
Review instructions	0.13	0.00	0.49	0.61	\$10.29	\$0.00	\$23.53	\$33.82
Gather information	0.00	0.53	0.70	1.23	\$0.00	\$35.48	\$33.79	\$69.28
Fill out Close Out forms (incremental information)	0.34	0.13	0.50	0.96	\$27.77	\$8.38	\$24.14	\$60.29
Record keeping	0.03	0.00	0.24	0.26	\$2.06	\$0.00	\$11.47	\$13.52
Total	0.49	0.65	1.93	3.07	\$40.11	\$43.87	\$92.93	\$176.91
Private Fleets								
Review instructions	0.13	0.00	0.49	0.61	\$10.09	\$0.00	\$18.17	\$28.26
Gather information	0.00	0.53	0.70	1.23	\$0.00	\$20.96	\$26.09	\$47.05
Fill out Close Out forms (incremental information)	0.34	0.13	0.50	0.96	\$27.24	\$4.95	\$18.64	\$50.82
Record keeping	0.03	0.00	0.24	0.26	\$2.02	\$0.00	\$8.85	\$10.87

Total	0.49	0.65	1.93	3.07	\$39.34	\$25.91	\$71.75	\$137.00
<i>25 Buses Per Approved Applicant</i>								
State governments (includes tribal) and Local governments (includes school districts)								
Review instructions	0.13	0.00	0.49	0.61	\$10.29	\$0.00	\$23.53	\$33.82
Gather information	0.00	2.13	2.00	4.13	\$0.00	\$142.49	\$96.55	\$239.05
Fill out Close Out forms (incremental information)	1.81	0.63	2.00	4.44	\$149.14	\$41.91	\$96.55	\$287.60
Record keeping	0.05	0.00	0.73	0.78	\$4.11	\$0.00	\$35.00	\$39.11
Total	1.99	2.75	5.21	9.95	\$163.54	\$184.40	\$251.64	\$599.58
Private Fleets								
Review instructions	0.13	0.00	0.49	0.61	\$10.09	\$0.00	\$18.17	\$28.26
Gather information	0.00	2.13	2.00	4.13	\$0.00	\$84.18	\$74.54	\$158.72
Fill out Close Out forms (incremental information)	1.81	0.63	2.00	4.44	\$146.27	\$24.76	\$74.54	\$245.57
Record keeping	0.05	0.00	0.73	0.78	\$4.04	\$0.00	\$27.02	\$31.06
Total	1.99	2.75	5.21	9.95	\$160.39	\$108.93	\$194.28	\$463.60

Unit burden and cost are then combined with the number of respondents to estimate the total burden and cost in Table 4a and Table 4b.

Table 4a: Application Estimated total Burden and cost to Respondents.

Application Respondent Type	Number of Respondents/ Responses	Unit Burden and Cost		Total Burden and Cost over Emergency ICR Period	
		Hours	Cost (2022\$)	Hours	Cost (2022\$)
<i>One to 25 Bus Per Applicant</i>					
State governments (includes tribal)	125	2.00	\$136.45	250.00	\$17,055.90
Local governments (includes school districts)	955	2.00	\$136.45	1910.00	\$130,307.08
Private Fleets	1320	2.00	\$95.19	2640.00	\$125,652.38
Total for Application	2400		\$136.45	4,800.00	\$273,015.36

Table 4b: Close-out Form: Estimated Total Burden and Cost to Respondents.

Close-out Form Respondent Type	Number of Respondents/ Responses	Unit Burden and Cost		Total Burden and Cost over Emergency ICR Period	
		Hours	Cost (2022\$)	Hours	Cost (2022\$)
<i>One Bus Per Approved Applicant</i>					
State governments (includes tribal)	25	3.07	\$176.91	76.67	\$4,422.76
Local governments (includes school districts)	191	3.07	\$176.91	585.73	\$33,789.92
Private Fleets	183	3.07	\$137.00	561.20	\$25,071.49
Total	399			1,223.60	\$63,284.17
<i>25 Buses Per Approved Applicant</i>					
State governments (includes tribal)	25	9.95	\$599.58	248.75	\$14,989.55
Local governments (includes school districts)	191	9.95	\$599.58	1,900.45	\$114,520.18
Private Fleets	183	9.95	\$463.60	1,820.85	\$84,839.63
Total	399			3,970.05	\$214,349.37
Total Close out Form Average Burden and Cost				2,596	\$133,817

The EPA expects to have approximately 2,799 (estimated) respondents and 3,599 responses associated with this Emergency ICR that will account for approximately 7,397 total burden hours at a cost of \$411,832. The EPA will reevaluate, and reconsider burden estimates within six months when DERA/CSB ICR No. 2060-0686 is renewed.

13. 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).
 - a) 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.

- b) 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.**
- c) 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.**

This emergency ICR accounts for labor costs only. There are no capital or operation and maintenance costs associated with this action.

14. 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.

EPA will review the new Application and Close-out Form data fields submitted by approved applicants. Table 5 presents the estimated Agency burden hours and costs associated with the information collection activities under this ICR. EPA based its burden estimate on the best professional judgement of CSB program staff. This estimate is considered conservative.

Agency wage rate data used to calculate labor costs were gathered from the U.S. Office of Personnel Management Salary Table 2023-DCB, for a GS-13, step 10, employee in the Washington, D.C. area. Similar to respondent wages, Agency wage data are adjusted to account for both fringe benefits and overhead according to guidance provided in EPA's *Handbook on Valuing Changes in Time Use Induced by Regulatory*

Requirements and Other EPA Actions.³ The 2022 loaded wage rate of \$131.31/hour is used in this analysis.

Table 5: Estimated Burden and Cost to the Agency

Collection Activity	Burden per Response	Number of Responses	Total Agency Burden Over the Emergency ICR Period	Total Agency Cost Over the Emergency ICR Period (2022\$)
Process new close out data fields ¹	3.00	399	1,197	\$157,178.52

¹ Time estimate provided by EPA/OTAQ (Tim Thomas) via email on 4/28/2023: Estimated 2.5 – 3.0 hours per application depending on amount of buses, infrastructure, and errors on the form

The addition of new application information and materials is not expected to have any substantive impact on the time or cost already approved in DERA/CSB ICR No. 2060-0686. The EPA will reconsider agency burden associated with processing application packages when it revises that ICR in the near future.

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

This ICR is for emergency approval of Application and Close-out Form data fields and only captures the incremental program burden due to these additional reporting requirements. Overall program changes will be addressed in the upcoming revision ICR for the CSB Rebate Program.

16. 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.

Not applicable.

17. 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.

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

³ U.S. Environmental Protection Agency (EPA) (2020). Handbook on Valuing Changes in Time Use Induced by Regulatory Requirements and Other EPA Actions. EPA-236-B-15-001. National Center for Environmental Economics.

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

SUPPLEMENTAL INFORMATION

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-OAR-2012-0103.

Ref.	Title
1.	Appendix A: Emergency ICR Calculations
2.	Screenshots of Clean School Bus Close-out Form
3.	Screenshots of Clean School Bus Application Form (noting additional data fields)
4.	Clean School Bus Program Application User Guide