

Supporting Statement for Information Collection Request

EXECUTIVE SUMMARY

Title: Indoor airPLUS Program

EPA ICR No.: 2763.01

OMB Control No.: 2060-NEW

Abstract:

Indoor AirPlus is aimed at forming public-private partnerships that help prevent various forms of indoor air pollution and their associated health risks. This ICR covers information collection activities under the EPA's newly revised Indoor AirPlus Program. Indoor AirPlus is a voluntary certification labeling program that represents value-added marketability that home builders, Verification Companies, and Oversight Organizations can use to distinguish themselves from competition, while homeowners see a healthier and safer home with improved indoor air quality (IAQ) by requiring construction practices and product specifications that minimize exposure to airborne pollutants and contaminants.

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.

Section 103(a) of the Clean Air Act authorizes the EPA to establish "a national research and development program for the prevention and control of air pollution." As part of such a program, the EPA is to "conduct and promote the coordination and acceleration of research, investigations, experiments, demonstrations, surveys, and studies relating to the causes, effects (including health and welfare effects), extent, prevention and control of air pollution." Section 103(a)(1).

In addition, as a component of the program, section 103(g) of the Clean Air Act directs the Administrator to "conduct a basic engineering research and technology program to develop, evaluate, and demonstrate non-regulatory strategies and technologies for air pollution prevention." The section calls on the Administrator to provide opportunities for industry, public interest groups, scientists, and other interested persons to participate in strategy development. Section 103(g) further directs the EPA to include as elements in the program "improvements in non-regulatory strategies and technologies for preventing or reducing multiple air pollutants including sulfur oxides, nitrogen oxides, heavy metals, PM-10 (particulate matter), carbon monoxide, and carbon dioxide..." The strategies and technologies are to improve various air pollutant reduction and non-regulatory control strategies, including energy conservation.

This new collection ICR covers information collection activities under the Indoor AirPlus Program within the residential sector (newly-built or gut rehabilitated). The Indoor AirPlus Program originally grew from the ENERGY STAR Certified Homes Program, and the first Indoor AirPlus Construction Specifications (Oct. 2008) built upon the pre-requisite of ENERGY STAR certification and were applicable to new construction or substantially rehabilitated (“gut rehabilitation”) projects in single-family and some multifamily properties (5 stories or below). In December 2020, the EPA published a draft of its first major proposed program change since 2008, including advanced IAQ requirements and the opening of eligibility to multifamily buildings of all heights. In February 2022, the EPA republished the major proposed program change to include considerations posed during the initial comment period.

As the program includes eligibility for both newly-built or gut rehabilitated homes, the EPA is additionally developing more refined IAQ technical requirements and Indoor AirPlus partnership opportunities which may be independent of the ENERGY STAR program framework. Since participation in the Indoor AirPlus Program is voluntary, organizations are not required to submit information to the EPA. Information received is not of a confidential nature. The EPA is developing this ICR to obtain authorization to collect information for the following activities described below:

- Joining the Indoor AirPlus Program and Related Activities
- Verification and Quality Assurance of Indoor AirPlus Requirements
- Quarterly Reporting
- Indoor AirPlus Leader Awards

The information collection activities described in this ICR are necessary for the EPA to track and assess the market for homes with improved indoor air quality. This allows the EPA to establish cost-effective, above-code indoor air quality requirements, design public outreach programs and materials to fit the needs of its partners and their customers. It also allows the EPA to provide public recognition and market differentiation to participating organizations. Because some of the collection activities involve small businesses, the EPA will limit collection activities where a minimum amount of information is sufficient for the EPA to complete its work.

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 EPA uses information from partnering organizations to ascertain basic identification and contact information and to verify their commitment to the program and the proper use of the Indoor AirPlus brand in promotional efforts. For example, Indoor AirPlus uses its Partnership Agreement to establish the partner’s commitment to utilize the program’s promotional guidelines, which describe how the Indoor AirPlus name and logo can be used by partners in public outreach activities. The EPA also includes provisions for the application of the Indoor AirPlus label on homes and apartments if they meet certain construction specifications defined by the EPA. To be approved to receive the Indoor AirPlus label, homes/buildings must be inspected by a third-party verifier (a.k.a., “rater”), confirming that program requirements were met.

In addition, the EPA uses information from partnering organizations for program implementation purposes, such as maintaining up-to-date public listings of active partners, their

program activity, and additional commitments. For example, the EPA will display a list of currently active Indoor AirPlus builder and rater partners on its public website (<https://www.epa.gov/indoorairplus/find-indoor-airplus-builder-or-rater>) in coordination with the ENERGY STAR Residential Programs, as well as a listing of builder partners who have made the “Indoor AirPlus 100% Commitment” and earned that additional designation.

Further, the EPA intends to use information from organizations involved in constructing, renovating, verifying, and promoting health protections and upgrades, to evaluate industry accomplishments, trends, and opportunities in home performance and renovation activities, assessing potential program updates to improve IAQ in existing homes. Lastly, the EPA uses information from organizations seeking public recognition for their support of Indoor AirPlus. The EPA recognition enhances the image of organizations as national leaders in the effort to promote health and safety in residential housing.

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.

All information collected is digital and provided directly through a fillable PDF, a fillable web form, or similar electronic submission portal.

In collecting and analyzing the information associated with this ICR, the EPA will use telephone systems, computers, and applicable database software. All submittals to the EPA are conducted electronically. The EPA will ensure the accuracy and completeness of collected information by reviewing each submittal. The EPA may enter the information into a database and monitor the progress of participants in improving energy performance. While the database itself is not publicly available, information contained in the database is made publicly available at the stakeholder’s choosing at www.energystar.gov/partnerlocator, which is a search tool that allows the general public to search for ENERGY STAR partners doing business within their geographic area. Please note that program participants can, at any time, opt in or out of having information displayed publicly.

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.

The information collected under this ICR does not duplicate any information that is collected by any other federal agency or otherwise publicly available. Some of the activities listed in this ICR are performed through a collaborative process with the ENERGY STAR Residential Programs. This ICR (No. 2763.01) does not duplicate burdens estimated in the EPA’s ENERGY STAR Program in the Residential Sector ICR (No. 2193.03). Respondents would only need to respond to one program or the other, not both.

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

The EPA expects that small businesses will participate in the Indoor AirPlus Program. The EPA has designed its report forms to minimize respondent burden while obtaining sufficient and accurate information. In addition, the initial agreement to participate in the program is voluntary.

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.

The EPA has carefully considered the information collection burden imposed by the Indoor AirPlus Program. The EPA is confident that those activities requested of respondents are necessary, and to the extent possible, the Agency has attempted to minimize the burden imposed. The EPA believes strongly that, if the information collections in this ICR are not performed at the requested frequency, the EPA's ability to implement the Indoor AirPlus Program and the public's ability to benefit from the program's tools and resources could be hampered significantly.

7. Explain any special circumstances that would cause an information 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.

Information collections performed under this clearance will follow all of OMB's General Guidelines regarding federal data collection.

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 by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency 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.

The EPA published a Federal Register Notice (88 FR 49459) on July 31, 2023. No comments on the ICR were received on this notice.

In November 2023, the EPA contacted two partner to request their comments on key burden estimates and statements in this ICR. The purpose of these consultations was to determine if the burden estimates (e.g., for completing a partnership agreement) should be updated or revised in preparing ICR No. 2763.01. The EPA selected one home builder and one verification organization. They represent the two main partnership programs available within the Indoor AirPlus Program. The table below identifies the points of contact (POCs) and their organizations.

Organization Name	Organization Type	Point of Contact	E-mail	Feedback Date
Thrive Home Builders	Home Builder	Shadia Lemus	slemus@thrivehomebuilders.com	11/9/2023
E3 Energy	Home Energy Rater	Justin Erickson	jerickson@e3energylc.com	11/10/2023

The EPA provided a consultation questionnaire that detailed the information collection activities and the burden estimates. A complete draft of the supporting statement was also made available to each organization if requested. Following is a summary of the EPA's questions, POC's comments, and the EPA's responses (e.g., if and how the Agency incorporated the comments into ICR No. 2763.01.

Question A. Table A presents the ICR's estimate of the time that an organization spends, on average, on certain activities associated with joining Indoor AirPlus and related activities. Please review the table and determine if the hours are realistic as an industry average (based on your own industry experience and judgment). If you disagree with the estimates, please provide alternative estimates that are representative of the industry and explain the basis of your assumptions.

**Table A. Hourly Burden for Activities Associated with
Joining Indoor AirPlus and Related Activities**

Activity	ICR Estimates of Burden per Activity	Agree or Disagree with ICR Estimate	Your Estimates (if you disagree with ICR)
Home Builders and Verification Organizations			
Complete and submit online Partnership Agreement to the EPA	Managerial labor: 1 hour Total: 1 hour per organization		
Select and annually renew 100% commitment online	Managerial labor: 15 minutes Total: 15 minutes per organization		
Oversight Organizations			
Complete and submit application to the EPA	Managerial labor: 2 hours Technical labor: 2 hours Total: 4 hours per organization		

Comments: The two POCs agreed with the EPA's estimate and did not raise any concerns.

EPA Response: The EPA thanked the POCs for the input. The EPA did not revise its estimate for this activity.

Question B. Table B presents the ICR's estimate of the time that an organization spends, on average, on certain activities associated with verification of Indoor AirPlus requirements. Please review the table and determine if the hours are realistic as an industry average (based on your own industry experience and judgment). If you disagree with the estimates, please provide alternative estimates that are representative of the industry and explain the basis of your assumptions.

**Table B. Hourly Burden for Activities Associated with
Verification of Indoor AirPlus Requirements**

Activity	ICR Estimates of Burden per Activity	Agree or Disagree with ICR Estimate	Your Estimates (if you disagree with ICR)
Home Energy Raters			
Individually Rated – Complete Indoor AirPlus Checklist	Technical labor: 30 minutes Total: 30 minutes per organization		
Sampled – Complete Indoor AirPlus Checklist	Technical labor: 30 minutes Total: 30 minutes per organization		
Oversight Organizations			
Enter Indoor AirPlus information in database	Technical labor: 15 minutes Total: 15 minutes per organization		
Perform periodic review of Indoor AirPlus documentation	Technical labor: 1 hour Total: 1 hour per organization		
Submit QA information to the EPA, as needed	Technical labor: 30 minutes 1 hour Total: 30 minutes 1 hour per organization		

Comments: Ms. Lemus responded that her organization is not a Home Energy Rater or Oversight Organization and is unsure how long it takes to perform the activities associated with Verification of Indoor AirPlus Requirements.

Mr. Erickson responded in agreement for the first 4 activities in this section and disagreed with “Submit QA information to the EPA, as needed” and would estimate it at a total of 1 hour per organization.

EPA Response: The EPA thanked the POCs for the input. Based on the feedback obtained, the EPA increased its estimate from 30 minutes to 1 hour for the “Submit QA information to the EPA, as needed” activity associated with Verification of Indoor AirPlus Requirements.

Question C. Table C presents the ICR’s estimate of the time that an organization spends, on average, on certain activities associated with periodic reporting. Please review the table and determine if the hours are realistic as an industry average (based on your own industry experience and judgment). If you disagree with the estimates, please provide alternative estimates that are representative of the industry and explain the basis of your assumptions.

Table C. Hourly Burden for Activities Associated with Periodic Reporting

Activity	ICR Estimates of Burden per Activity	Agree or Disagree with ICR Estimate	Your Estimates (if you disagree with ICR)
Verification Organizations – Rating Providers			
Prepare and submit quarterly reports to the EPA	Technical labor: 1-hour 2 hours Total: 1-hour 2 hours per organization		
Oversight Organizations			
Prepare and submit annual update on program activities to the EPA	Managerial labor: 1-hour 1.5 hours Technical labor: 1-hour 1.5 hours Total: 1-hour 3 hours per organization		

Comments: Ms. Lemus responded that her organization is not a Home Energy Rater or Oversight Organization and is unsure how long it takes to perform the activities associated with Periodic Reporting.

Mr. Erickson responded that he disagreed with both activities associated with Periodic Reporting and estimated that the activities would require 2 and 3 hours respectively.

EPA Response: The EPA thanked the POCs for the input. Based on the feedback obtained, the EPA increased its estimate from 1 to 2 hours for the “Prepare and submit quarterly reports to the EPA” activity and increased its estimate from 2 to 3 hours for the “Prepare and submit annual update on program activities to the EPA” activity associated with Periodic Reporting.

Question D. Table D presents the ICR’s estimate of the time that an organization spends, on average, on certain activities associated with Indoor AirPlus Leader Awards. Please review the table and determine if the hours are realistic as an industry average (based on your own industry experience and judgment). If you disagree with the estimates, please provide alternative estimates that are representative of the industry and explain the basis of your assumptions.

Table D. Hourly Burden for Activities Associated with Leader Awards

Activity	ICR Estimates of Burden per Activity	Agree or Disagree with ICR Estimate	Your Estimates (if you disagree with ICR)
New Home Builder and Home Energy Rater			
Complete and submit application, including any supplemental info to the EPA.	Managerial labor: 1-hour 1.5 hours Technical labor: 1-hour 3 hours Clerical labor: 1-hour 3 hours Total: 3-hours 7.5 hours per organization		

Comments: Ms. Lemus responded that her organization disagrees with the ICR estimate for this activity and would estimate it at a total of 9 hours per organization.

Mr. Erickson responded that his organization disagrees with the ICR estimate for this activity and would estimate it at a total of 6 hours per organization.

EPA Response: The EPA thanked the POCs for the input. Based on the feedback obtained, the EPA increased its estimate from 3 to 7.5 hours for the activity associated with Leader Awards.

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

No payment or gifts are provided to respondents.

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

Participation in the Indoor AirPlus Program is voluntary and may be terminated by participants or the EPA at any time. If a claim of confidential business information (CBI) is asserted, the EPA will manage that information in accordance with the EPA's provisions on confidentiality. 40 CFR Part 2, Subpart B establishes the EPA's general policy on the public disclosure of information and procedures for handling CBI claims.

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 questions of a sensitive nature are asked of participants with Indoor AirPlus.

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’.

Estimating the Respondent Universe

In developing its estimates, the EPA referred to its partnership database (e.g., ESConnect) and other documentation to understand historical trends in the number of new and existing respondents. Based on its analyses, the EPA has estimated the average number of new and active (i.e., existing) respondents for each of the information collections over the next three years. As shown in Table, 1, the EPA estimates 566 new and 2,142 active participants under the program on average annually over the next three years. These estimates are discussed in the remainder of this section and reflected in Exhibits 1 through 4.

Table 1. Number of New and Active Program Participants

Respondent Category	New	Active
Home Builders		
Home Builders	500	1,677
Subtotal	500	1,677
Verification Organizations		
Raters	50	375
Providers	10	90
Subtotal	60	465
Oversight Organizations		
Home Certification Organizations (HCOs)	6	0
Subtotal	6	0
Total	566	2,142

Joining the Indoor AirPlus Program and Related Activities Information Collection

Home builders and Verification Organizations

Organizations in this category include:

- Home builders, including builders of traditional site-built homes, modular homes, production homes, custom homes, and multifamily buildings.
- Verification organizations, including Rating Companies (e.g., home energy raters and rating providers) who are responsible for third-party verification that a home meets the Indoor AirPlus's program requirements.

These participants prepare and submit an online Partnership Agreement. In addition, when a home builder joins, it can commit to build all of its homes to be Indoor AirPlus certified (i.e., a "100% Commitment"). The Indoor AirPlus 100% Commitment is reviewed and updated on an annual basis. An Indoor AirPlus Home builder and/or Rating Company will also have the opportunity to commit to participating in the EPA's ENERGY STAR Residential program with the associated online Partnership Agreement.

Indoor AirPlus partnership has historically been integrated with the ENERGY STAR partnership process and continues to provide an integrated partner onboarding process for homebuilders and rating companies intending to join both programs at the same time. Indoor AirPlus Version 2 offers the opportunity for new Indoor AirPlus partners to join the program independently without other partnership pre-requisites, if desired. In this ICR, the EPA is accounting for the relative proportional burden to add the Indoor AirPlus partnership for those partners submitting an ENERGY STAR partnership application, along with the estimated burden for new partners joining Indoor AirPlus independently. To avoid duplication, this ICR (No. 2763.01) does not duplicate information collection efforts listed in the EPA's ENERGY STAR Program in the Residential Sector ICR (No. 2193.03). The respondent would only need to respond to one program or the other, not both.

Data Items

- A Partnership Agreement for homebuilders and verification organizations.
- For homebuilders, selection of 100% commitment (optional) and annual renewal.
- For homebuilders and rating companies, selection to participate in ENERGY STAR Residential (optional).

Respondent Activities

- To join Indoor AirPlus, organizations are asked to complete and submit the Partnership Agreement online. This process includes the option to select the 100% commitment.
- Builder partners can select choose to renew their 100% commitment option online annually.

Oversight Organizations

Organizations in this category include:

- Home Certification Organizations (HCO), which oversee the Indoor AirPlus related activities of Indoor AirPlus rating companies and their verifiers in the certification process for Indoor AirPlus labeled homes/apartments. HCOs submit an application to the EPA to be recognized and approved to oversee the Indoor AirPlus certification process.

Oversight organizations do not join as Indoor AirPlus partners, but rather participate in the program by completing and submitting an application to the EPA to request to be an EPA-recognized oversight organization. The application must describe the organization's ability to provide independent oversight over the Indoor AirPlus-related activities of participating organizations, including, but not limited to, its criteria for determining whether a participating organization has the necessary training and capabilities, its plan for conducting quality assurance oversight activities of participating organizations, its dispute resolution process, and plans for data management and reporting.

Data Items

- An application that includes:
 - Organization's ability to provide independent oversight of Indoor AirPlus-related activities of participating organizations.
 - Criteria for determining whether a participating organization has the necessary training and capabilities.
 - Plan for conducting quality assurance oversight activities of participating organizations.
 - Description of dispute resolution process.
 - Plan for data management and periodic reporting.
 - Plan for electronic identification of homes earning the Indoor AirPlus label.

Respondent Activities

- Complete and submit application materials to the EPA.

Verification Of Indoor AirPlus Requirements Information Collection

Verification Organizations (Rating Companies)

Indoor AirPlus rating companies and their Verifiers (e.g., home energy raters and rating providers) perform verification services in the process of Indoor AirPlus certification. These services consist of onsite diagnostic tests and visual verification to ensure the program specifications have been met. Home energy ratings are also often performed as a part of the rating company's normal business process and are integral to the ENERGY STAR certification process. For homes undergoing an energy rating and earning the ENERGY STAR label, Verifiers must check inspect additional IAQ features during construction to verify that the homes meet Indoor AirPlus requirements documented on the Indoor AirPlus checklist by the Verifier. The checklist is not submitted to EPA but is retained by the Verifier and is subject to routine quality control measures outlined by the verifier's oversight organization.

Data Items

- Indoor AirPlus Verification Checklist.

Respondent Activities

- Complete the Indoor AirPlus Verification Checklist.

Indoor AirPlus verification has historically been integrated with the ENERGY STAR verification process. In this ICR, the EPA is accounting for the relative proportional burden to include Indoor AirPlus verification for those partners submitting and ENERGY STAR verification, along with the estimated burden for verification that is independent from ENERGY STAR. To avoid duplication, this ICR (No. 2763.01) does not duplicate information collection efforts listed in the EPA's ENERGY STAR Program in the Residential Sector ICR (No. 2193.03). The respondent would only need to respond to one program or the other, not both.

Oversight Organizations***Home Certification Organizations (HCOs)***

As part of their quality assurance oversight responsibilities, HCOs must maintain an electronic method of identifying homes earning the Indoor AirPlus label. HCOs also conduct periodic reviews of a sample of Indoor AirPlus-related documentation. HCOs must also provide information to the EPA, upon request, about quality assurance issues related to Indoor AirPlus.

Data Items

- Electronic identification of homes earning the Indoor AirPlus label.
- Documents from Indoor AirPlus certification activities.
- Information about quality assurance issues and actions taken to resolve issues.

Respondent Activities

- Enter information into electronic database to designate homes that have earned the Indoor AirPlus label.
- Perform periodic review of a sample of Indoor AirPlus certification documentation.
- Submit quality assurance-related information to EPA, upon request.

Periodic Reporting Information Collection

The EPA asks partners to provide periodic updates, usually quarterly, on activities and accomplishments under the program. The EPA will use this information to ensure that partners are meeting their program commitments. For example, the EPA collects basic information each calendar quarter about the number of Indoor AirPlus certified homes that have been built by home builders and reported by HCOs overseeing their verifier network. The EPA also uses this information to keep the public informed about partners' participation and program activity.

Data Items

- A quarterly report aggregating the number of:
 - Indoor AirPlus certified homes (rating providers).

Respondent Activities

- Rating providers electronically prepare and submit quarterly reports to the EPA.

Indoor AirPlus periodic reporting has historically been integrated with the ENERGY STAR verification process. In this ICR, the EPA is accounting for the relative proportional burden to include Indoor AirPlus reporting for those partners submitting and ENERGY STAR verification, along with the estimated burden for reporting that is independent from ENERGY STAR. To avoid duplication, this ICR (No. 2763.01) does not duplicate information collection efforts listed in the EPA's ENERGY STAR Program in the Residential Sector ICR (No. 2193.03). The respondent would only need to respond to one program or the other, not both.

Indoor AirPlus Leader Awards Information Collection

Organizations interested in receiving recognition for their efforts in building and certifying Indoor AirPlus homes may submit an application for the annual Indoor AirPlus Leader Award. The EPA currently awards only home builders and raters.

Data Items

- Information provided electronically by home builders:
 - General information (e.g., company address, contact information, signed/dated).
 - Description of the following:
 - Outreach activities (e.g., promoting Indoor AirPlus on website).
 - Training activities (e.g., training construction staff on Indoor AirPlus construction features).
 - Use of innovative technology (e.g., use of IAQ monitors).
 - Supplemental documentation (optional) to accompany the application. This may include, but is not limited to, examples of sales and marketing collateral, copies of sales training materials, screen captures of the company website, etc.
- Information provided electronically by raters:
 - General information (e.g., company address, contact information, signed/dated).
 - Description of the following:
 - Recruitment activities (e.g., recruitment of new builders).
 - Technical support (e.g., providing technical assistance to builders).
 - Innovation (e.g., improvements to verification process).
 - Outreach activities (e.g., educating real estate professionals about Indoor AirPlus).

Respondent Activities

- Organizations complete and submit the application online, including supplemental materials.

Collection Schedule

All information collection activities described in this ICR are either a one-time collection, occur annually, quarterly, or on an as-needed basis.

Estimating Respondent Burden

Exhibits 1 through 4 estimate the annual respondent burden hours for information collection activities associated with the Indoor AirPlus Program. The burden estimates used in this new ICR were informed by the ENERGY STAR ICR No. 2193.03, as activities and respondents are very similar, and continued program coordination is intended to streamline collection activities, while also appropriately estimating the associated burden accordingly.

Estimating Respondent Costs

Exhibits 1 through 4 present the annual respondent costs for information collection activities associated with the Indoor AirPlus Program. Specific cost assumptions are discussed below.

Estimating Labor Costs

The labor rates used to estimate costs to respondent were obtained from the U.S. bureau of Labor Statistics (BLS). Specifically using the BLS “Employment Cost Index: Continuous Dataset”. Rates are current as of March 2023 and reflect the cost of overhead and fringe benefits where appropriate. The EPA estimates an average responded hourly labor rate (hourly plus overhead and fringe) of \$199.58 for legal staff, \$144.35 for managerial staff, \$99.03 for technical staff, and \$49.86 for clerical staff.

Total Burden and Costs

Joining The Indoor AirPlus Program and Related Activities (Exhibit 1)

Home Builders and Verification Organizations

The EPA estimates that, during the three-year life of this ICR, on average, 500 home builders will complete and submit the Online Partnership Agreement to the EPA each year. The EPA estimates that 4% of these home builders, or 20 home builders, on average will choose the 100% commitment on their Partnership Agreement each year and that all of these home builders renew their 100% commitment annually. The EPA also estimates that 60 verification organizations (home energy raters and rating providers) will submit an Online Partnership Agreement, on average, each year.

Verification Of Indoor AirPlus Requirements (Exhibit 2)

Verification Organizations (Home Energy Raters and Rating Providers)

Home Energy Raters

The EPA estimates that, on average, 20,000 homes will earn Indoor AirPlus certification annually during the three-year life of this ICR. The EPA also estimates that 25% of the homes are multifamily and are allowed to be verified by a sampling method. Of these 5,000 multifamily units, one in seven is individually verified; therefore, 714 of the 5,000 multifamily units ($5,000 / 7 = 714$) are verified in field. This means that the EPA estimates a total of 15,714 ($15,000 + 714$) units verified each year.

There is one checklist used to certify a home for the Indoor AirPlus label completed by the rater. Refer to Table 2 and the associated text, below, for additional information on these estimates.

Table 2. Estimated Annual Number of certified Indoor AirPlus Homes

Certification Method	Annual No. of Homes Certified	No. of Indoor AirPlus Checklists Completed
Individually Certified Homes	20,000	15,714
Total	20,000	15,714

Oversight Organizations

Home Certification Organizations (HCOs)

The EPA estimates that, on average, there will be 6 participating HCOs annually during the three-year life of this ICR. The EPA estimates that, on average, each HCO conducts one periodic review of Indoor AirPlus-related documentation annually. Each HCO also maintains Indoor AirPlus-related information in a database. The EPA also estimates that, on average, each HCO coordinates with the EPA four times a year to resolve Indoor AirPlus-related verification issues.

Periodic Reporting (Exhibit 3)

Verification Organizations

The EPA estimates that, on average, there will be 90 providers participating in the Indoor AirPlus Program annually during the three-year life of this ICR, and each provider will submit four quarterly reports to the EPA each year.

Indoor AirPlus Leader Awards (Exhibit 4)

Based on previous award applications received, the EPA estimates that, on average, 25 home builder partners and 15 verification organizations will apply for an Indoor AirPlus award each year.

Exhibit 1

Estimated Annual Respondent Burden and Cost

Indoor AirPlus Program: Joining the Indoor AirPlus Program and Related Activities*

	Hours and Costs Per Respondent**								Total Hours and Costs		
Information Collection Activity	Legal	Managerial	Technical	Clerical	Respond. Hours/ Activity	Labor Costs/ Activity	Capital Startup Costs / Activity	O&M Costs/ Activity	No. of Respond. Activities	Total Hours/ Year	Total Cost/Year
Home Builders and Verification Organizations											
Complete and submit online Partnership Agreement to the EPA	0.00	1.00	0.00	0.00	1.00	\$144.35	\$0.00	\$0.00	560	560.00	\$80,836.00
Select and annually renew 100% commitment online	0.00	0.25	0.00	0.00	0.25	\$36.09	\$0.00	\$0.00	67	16.77	\$2,420.92
Subtotal	0.00	varies	varies	varies	varies	varies	\$0.00	\$0.00	varies	576.77	\$83,256.92
Oversight Organizations											
<i>Home Certification Organizations (HCOs)</i>											
Complete and submit application to the EPA	0.00	2.00	2.00	0.00	4.00	\$486.76	\$0.00	\$0.00	6.00	24.00	\$2,920.56
Subtotal	0.00	varies	varies	varies	varies	varies	\$0.00	\$0.00	varies	24.00	\$2,920.56
TOTAL	0.00	varies	varies	varies	varies	varies	\$0.00	\$0.00	varies	600.77	\$86,177.48

* Partnership with Indoor AirPlus is completely voluntary and can be terminated for no reason by the respondent.

** The EPA uses the term 'varies' in the subtotal and/or total row of the exhibit if the total hours or costs per respondent under an information collection vary among the respondents.

Exhibit 2

Estimated Annual Respondent Burden and Cost

Indoor AirPlus Program: Verification of Indoor AirPlus Requirements*

Information Collection Activity	Hours and Costs Per Respondent**								Total Hours and Costs					
	Legal	Managerial	Technical	Clerical	Respond. Hours/ Activity	Labor Costs/ Activity	Capital Startup Costs / Activity	O&M Costs/ Activity	No. of Respond. Activities	Total Hours/ Year	Total Labor Cost/Year	Total Annual Capital Cost	Total Annual O&M Cost	Total Cost/Year
Verification Organizations														
<i>Home Energy Raters</i>														
Site-Built Homes: Individually Rated														
Complete Indoor AirPlus Checklist	0.00	0.00	0.50	0.00	0.50	\$49.52	\$0.00	\$0.00	15,714	7,857.00	\$778,157.28	\$0.00	\$0.00	\$778,157.28
Site Built Homes: Sampled														
Complete Indoor AirPlus Checklist	0.00	0.00	0.50	0.00	0.50	\$49.52	\$0.00	\$0.00	4,286	2,143.00	\$212,242.72	\$0.00	\$0.00	\$212,242.72
Subtotal	0.00	0.00	varies	0.00	varies	varies	\$0.00	\$0.00	varies	10,000.00	\$990,400.00	\$0.00	\$0.00	\$990,400.00
Oversight Organizations														
<i>Home Certification Organizations (HCOs)</i>														
Enter Indoor AirPlus information in database	0.00	0.00	0.25	0.00	0.25	\$24.76	\$0.00	\$0.00	6.00	1.50	\$148.56	\$0.00	\$0.00	\$148.56
Perform periodic review of Indoor AirPlus documentation	0.00	0.00	1.00	0.00	1.00	\$99.03	\$0.00	\$0.00	6.00	6.00	\$594.18	\$0.00	\$0.00	\$594.18
Submit QA information to EPA, as needed	0.00	0.00	1.00	0.00	1.00	\$99.03	\$0.00	\$0.00	24.00	24.00	\$2,376.72	\$0.00	\$0.00	\$2,376.72
TOTAL	0.00	0.00	varies	varies	varies	varies	\$0.00	\$0.00	varies	10,031.50	\$993,519.46	0.00	0.00	\$993,519.46

* Partnership with Indoor AirPlus is completely voluntary and can be terminated for no reason by the respondent.

** The EPA uses the term 'varies' in the subtotal and/or total row of the exhibit if the total hours or costs per respondent under an information collection vary among the respondents.

Exhibit 3

Estimated Annual Respondent Burden and Cost
Indoor AirPlus Program: Periodic Reporting*

Information Collection Activity	Hours and Costs Per Respondent**								Total Hours and Costs					
	Legal	Managerial	Technical	Clerical	Respond . Hours/ Activity	Labor Costs/ Activity	Capital Startu p Costs / Activity	O&M Costs/ Activity	No. of Respond Activities	Total Hours/ Year	Total Labor Cost/ Year	Total Annual Capital Cost	Total Annual O&M Cost	Total Cost/Year
	\$199.58	\$144.35	\$99.03	\$49.86										
Verification Organizations - Rating Providers														
Prepare and submit quarterly reports to the EPA	0.00	0.00	2.00	0.00	2.00	\$198.06	\$0.00	\$0.00	465	930.00	\$92,097.90	\$0.00	\$0.00	\$92,097.90
Subtotal	0.00	0.00	2.00	0.00	2.00	\$198.06	\$0.00	\$0.00	465	930.00	\$92,097.90	\$0.00	\$0.00	\$92,097.90
Oversight Organizations														
<i>Home Certification Organizations (HCOs)</i>														
Prepare and submit annual update on program activities to the EPA	0.00	1.00	2.00	0.00	3.00	\$342.41	\$0.00	\$0.00	1.33	0.00	\$455.41	\$0.00	\$0.00	\$455.41
Subtotal	0.00	0.00	varies	0.00	varies	varies	\$0.00	\$0.00	varies	0.00	\$455.41	\$0.00	\$0.00	\$455.41
TOTAL	0.00	0.00	varies	0.00	varies	varies	\$0.00	\$0.00	varies	930.00	\$92,553.31	\$0.00	\$0.00	\$92,553.31

* Periodic reporting is completely voluntary and can be terminated for no reason by the respondent.

** The EPA uses the term 'varies' in the subtotal and/or total row of the exhibit if the total hours or costs per respondent under an information collection vary among the respondents.

Exhibit 4

Estimated Annual Respondent Burden and Cost

Indoor AirPlus Program: Indoor AirPlus Leader Awards*

Information Collection Activity	Hours and Costs Per Respondent**								Total Hours and Costs		
	Legal	Managerial	Technical	Clerical	Respond. Hours/ Activity	Labor Costs/ Activity	Capital Startup Costs / Activity	O&M Costs/ Activity	No. of Respond. Activities	Total Hours/ Year	Total Cost/Year
New Home Builder											
Complete and submit application, including any supplemental info to the EPA	0.00	3.00	3.00	1.50	7.50	\$804.93	\$0.00	\$0.00	25	187.50	\$20,123.25
Subtotal	0.00	3.00	3.00	1.50	7.50	\$804.93	\$0.00	\$0.00	25	187.50	\$20,123.25
Home Energy Rater and Provider											
Complete and submit application, including any supplemental info to the EPA	0.00	3.00	3.00	1.50	7.50	\$804.93	\$0.00	\$0.00	15	112.50	\$12,073.95
Subtotal	0.00	3.00	3.00	1.50	7.50	\$804.93	\$0.00	\$0.00	15	112.50	\$12,073.95
TOTAL	0.00	varies	varies	varies	varies	varies	\$0.00	\$0.00	varies	300.00	32,197.20

* Application for the Indoor AirPlus Awards is completely voluntary and is not required for Indoor AirPlus Partnership.

** The EPA uses the term 'varies' in the subtotal and/or total row of the exhibit if the total hours or costs per respondent under an information collection vary among the respondents.

Bottom Line Burden Hours and Cost Tables

As shown in Table 3, the EPA estimates the total annual burden to respondent to be 11,862 hours and \$1,204,447. The total bottom-line burden to respondents over three years is estimated to be 35,586 hours and \$3,613,342.

TABLE 3
TOTAL ESTIMATED ANNUAL RESPONDENT BURDEN HOUR AND COST SUMMARY*

Activity	Total Hours Per Year	Total Labor Costs Per Year	Total Capital Costs Per Year	Total O&M Costs Per Year	Total Cost Per Year
Joining the Indoor AirPlus Program and Related Activities	601	\$86,177	\$0	\$0	\$86,177
Verification of Indoor AirPlus Requirements	10,032	\$993,519	\$0	\$0	\$993,519
Periodic Reporting	930	\$92,553	\$0	\$0	\$92,553
Indoor AirPlus Leader Awards	300	\$32,197	\$0	\$0	\$32,197
Total	11,862	\$1,204,447	\$0	\$0	\$1,204,447

13. Provide an estimate for the total annual cost burden to respondents or record keepers 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.**

Estimating Capital and Operations and Maintenance Costs

Operation and maintenance (O&M) costs are those costs associated with a paperwork requirement incurred continually over the life of the ICR. They are defined by the Paperwork Reduction Act of 1995 as “the recurring dollar amount of costs associated with O&M or purchasing services.” Because all collections are transacted electronically using standard industry equipment and services, there are no O&M costs associated with the information collection activities described in this ICR.

14. Provide estimates of annualized costs 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.

Exhibits 5 through 8 present the annual Agency burden and costs for information collection activities associated with the Indoor AirPlus Program. The hourly labor rates used in this ICR were obtained from the 2023 GS pay schedule available from the Office of Personnel Management. The EPA estimates an average hourly labor cost of \$90.10 for legal staff, \$84.26 for managerial staff, \$61.78 for technical staff, and \$24.80 for clerical staff. The labor costs are based on the following GS levels and steps: legal labor rates were based on GS Level 15, Step 1, managerial labor rates were based on GS Level 14, Step 4, technical labor rates were based on GS Level 12, Step 5, and clerical labor rates were based on GS Level 5, Step 1. The EPA multiplied the hourly rates by the standard government overhead factor of 1.6. Total annual Agency burden and costs are presented in Table 4.

As shown in Table 4, the EPA estimates the total annual burden to the Agency to be 320 hours and \$15,619. The bottom-line burden to the Agency over three years is estimated to be 960 hours and \$46,856.

TABLE 4
TOTAL ESTIMATED ANNUAL EPA BURDEN HOUR AND COST SUMMARY*

Activity	Total Hours Per Year	Total Labor Costs Per Year	Total Capital Costs Per Year	Total O&M Costs Per Year	Total Cost Per Year
Joining the Indoor AirPlus Program and Related Activities	244	\$10,683	\$0	\$0	\$10,683
Verification of Indoor AirPlus Requirements	8	\$584	\$0	\$0	\$584
Periodic Reporting	8	\$494	\$0	\$0	\$494
Awards	60	\$3,857	\$0	\$0	\$3,857
Total	320	\$15,619	\$0	\$0	\$15,619

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

This is a new ICR, no changes in burden currently applicable.

16. For collections of information whose results will be published, outline 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.

Information collected is not published. Program participant information is available in an online database. Program participants can, at any time, opt in or out of having information displayed publicly.

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

The expiration date of the information collection approval will be publicly available on OMB's website.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

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