

From: [Edmonds, Marc](#)
Cc: [McFarley, Jake](#)
Subject: Renewal of Lead Training, Certification, Accreditation and Authorization Activities Information Collection Request
Date: Wednesday, May 3, 2023 7:05:00 AM

Dear Potential Respondent:

On April 26, 2023, EPA published a Notice in the Federal Register (88 FR 25401) titled “Agency Information Collection Activities; Proposed Renewal and Request for Comment; Lead Training, Certification, Accreditation and Authorization Activities” (See <https://www.federalregister.gov/documents/2023/04/26/2023-08793/agency-information-collection-activities-proposed-renewal-and-request-for-comment-lead-training>). This Notice refers to EPA’s intention to request renewed Office of Management and Budget (OMB) clearance of an information collection related to the regulations set forth in 40 CFR 745, Subparts E, L and Q.

The regulations in 40 CFR part 745, subpart E, cover work practice standards, recordkeeping and reporting requirements, individual and firm certification and enforcement for renovations done in target housing or child-occupied facilities. These regulations also require that a lead-based paint hazard information pamphlet be provided to the owner and occupant of target housing or child-occupied facilities (COFs), where renovations will be performed for compensation, except as otherwise specified, no more than 60-days prior to commencing the renovation. The regulations in 40 CFR part 745, subpart L, cover similar topics for lead-based paint activities done in target housing and child-occupied facilities. The regulations in 40 CFR part 745, subpart Q, establish the requirements that state or tribal programs must meet for authorization to administer the regulations described above.

In addition to the public notice and comment requirement that the above Notice initiates, OMB regulations at 5 CFR 1320.8(d)(1) require agencies to consult with potential respondents and data users about specific aspects of an information collection request (ICR) before submitting it to OMB for review and approval, regardless, in the case of ICR renewals, of whether changes have or have not been made to the collection activity.

As part of this required consultation, I am contacting you to solicit your input. Please note that if you take this opportunity to provide input, your name, affiliation, e-mail address, phone number and any information you provide (e.g., copies of e-mails) will be incorporated and attached to the ICR supporting statement, which will be a public document. In addition, the OMB Desk Examiner for the ICR in question may contact you to verify the accuracy of any comments EPA identifies in the ICR.

The requirements under this regulation directly impact the members of your organization. As such, EPA solicits your input on the attached questions.

To access the Federal Register Notice, the ICR supporting document, and any public comments received to date, go to:

- <https://www.regulations.gov/docket/EPA-HQ-OPPT-2017-0692>
- then click on any of the documents listed within the docket to read the document; you will be most interested in the Supporting Statement, identified by its title beginning "Information Collection Request..."

Your response will be greatly appreciated. You may complete the ICR questions below and submit them to the docket listed above or to me directly by June 25, 2023. If you have any questions with respect to any other part of the information collection, please email Jake McFarley at McFarley.Jake@epa.gov. EPA will consider your responses, as well as any public comment received in response to the Federal Register Notice identified above, in preparing a final document for OMB

review. Thank you for your assistance.

Renewal Questionnaire for "Lead Training, Certification, Accreditation and Authorization Activities" ICR

General

1. (For training provider, firm and individual applications) Is it clear what is required for data submission? If not, are there any suggestions for clarifying instructions?
2. (For firms and individuals) Is it clear what records must be retained for three years?
3. (For training providers) Is it clear what records must be retained for a period of five years?

Time and Cost Burden

4. (For firms) How much time does it take for you or your staff to complete the Application for Firms to Conduct Lead-based Paint Activities or Renovations application for firm certification?
5. (For individuals) How much time does it take for you or your staff to complete the Application and Instructions for Individuals Applying for Certification to Conduct Lead-Based Paint Activities?
6. (For training providers) How much time does it take for you or your staff to complete the Application and Instructions for Training Providers Applying for Accreditation of Lead-Based Paint Activity and Renovation Training Programs?
7. (For firms) How much time does it take for you or your staff to distribute the lead hazard information pamphlet?
8. (For all respondents) How much time does it take for you or your staff to comply with the recordkeeping requirements of this ICR?
9. (For all respondents) Do you agree with EPA's burden estimate and cost (ICR only addresses costs associated with paperwork)?
10. (For all respondents) Are there any other costs that should be accounted for? If so, please provide an explanation.
11. (For all respondents) Do you have any other suggestions or comments on how to reduce burden for the application forms, distribution of the lead hazard pamphlet or the recordkeeping requirements included in this ICR?
12. (For all respondents) Do you have any comments on the updated burden analysis contained in the draft ICR Renewal?

Electronic Reporting and Recordkeeping:

13. (For all respondents) Abatement, evaluation and renovation firms must apply online via CDX (Central Data Exchange). Do you have suggestions for how to improve the online application process?
14. (For training providers and abatement firms) Currently, required training and abatement notifications can be done by mail, fax, hand delivery or electronically via CDX. Do you have any

suggestions on how to increase utilization of CDX for these purposes?

15. (For firms) Are you interested in or currently using an electronic recordkeeping option for lead hazard information pamphlet distribution? Would you be able to satisfy the record keeping requirements electronically?

Overall Comments

16. (For all respondents) Do you have any other comments concerning this Information Collection Request?

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