

U.S. Environmental Protection Agency

Information Collection Request

Title: General Administrative Requirements for Assistance Programs

OMB Control Number: 2030-0020

EPA ICR Number: 0938.23

Abstract: This is a request for a renewal of an existing Information Collection Request (ICR). This ICR authorizes the collection of information under EPA's General Regulation for Assistance Programs that establishes the minimum management requirements for all recipients of EPA grants or cooperative agreements (assistance agreements). EPA award officials use the information required by the regulations summarized below to make assistance agreement awards, to make assistance payments, and to verify that the recipient is using federal funds appropriately to comply with federal requirements. This information is also needed by EPA project officers, grant specialists, Disadvantaged Business Enterprise (DBE) coordinators, and finance officials to manage/oversee recipient programmatic and financial performance under all EPA assistance agreements.

Supporting Statement A

1. NEED AND AUTHORITY FOR THE COLLECTION

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

This ICR authorizes the collection of information under EPA's General Regulation for Assistance Programs that establishes the minimum management requirements for all recipients of EPA grants or cooperative agreements (assistance agreements). For awards made prior to December 26, 2014, [40 CFR Part 30](#), "Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations," establishes the management requirements for institutions of higher education, hospitals, and other non-profit organizations, as well as procurement requirements for non-governmental recipients. For awards made prior to December 26, 2014, [40 CFR Part 31](#), "Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments," includes the management requirements for states, local governments, and Indian Tribal governments. These regulations include only those provisions mandated by statute, required by Office of Management and Budget (OMB) Circulars, or added by EPA to ensure sound and effective financial assistance management.

For awards made on or after December 26, 2014, [2 CFR 200](#) and EPA's implementation of 2 CFR 200 at [2 CFR 1500](#), "Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards," establishes the management requirements for all entity types. [40 CFR Part 35](#) outlines policies and procedures for assistance agreements to state, interstate, and local agencies and Indian Tribes and Intertribal Consortia for pollution abatement and control programs (listed in Subparts A and B). For all awards, [40 CFR Part 33](#), "Participation by Disadvantaged Business Enterprises in Procurement under Environmental Protection Agency (EPA) Financial Assistance Agreements," establishes Disadvantaged

Business Enterprises (DBE) utilization requirements for all entity types. These regulations include only those provisions mandated by statute or added by EPA to ensure sound and effective financial assistance management with respect to DBE utilization.

EPA award officials will use the information required by these regulations to make assistance agreement awards, to make assistance payments, and to verify that the recipient is using federal funds appropriately to comply with federal requirements.

This ICR is necessary because of the information collection and reporting requirements included in EPA regulations at 40 CFR Parts 30, 31, 33, 35, and 2 CFR Parts 200 and 1500. For some existing grants awarded prior to December 26, 2014, 40 CFR Parts 30 and 31 implement OMB Circulars [A-21, A-87, A-102, A-110, A-122, and A-133](#). For assistance agreements awarded on or after December 26, 2014, 2 CFR Part 1500 implements OMB regulations in 2 CFR Part 200. For all awards, 40 CFR Part 33 establishes DBE utilization requirements for all entity types. These regulations include only those provisions mandated by statute or added by EPA to ensure sound and effective financial assistance management with respect to DBE utilization.

These regulations set forth pre-award, post-award, and after-the-grant requirements. This information is needed by EPA project officers, grant specialists, DBE coordinators, and finance officials to manage/oversee recipient programmatic and financial performance under all EPA assistance agreements.

2. PRACTICAL UTILITY/USERS OF THE DATA

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 pre-award information is used by EPA to qualify and select assistance agreement applicants for funding. The post-award information is used to ensure that recipients are complying with statutory and regulatory requirements and to monitor recipient performance. The after-the-grant information is used to meet reporting and recordkeeping requirements and to close out awards. The information is necessary to ensure minimum fiscal control and accountability for EPA funds and to deter waste, fraud, and abuse.

The following identifies the non-form reporting requirements and application forms contained in this regulation. A detailed justification for each reporting requirement immediately follows.

Non-Form Requirements

- (1) **Record Keeping** - 40 CFR Sections 30.50, 30.52, and 31.42 (for awards made prior to December 26, 2014), 2 CFR Sections 200.301, 200.302, and 200.328 through 200.330 (for awards made on or after December 26, 2014), and 40 CFR Part 33 (for all awards) require recipients to establish an official record file for each assistance award to track how the recipient uses the project funds, to track how projects funds were made available to DBEs, to account for property purchased under the award or used as part of any in-kind contributions, to maintain time records, and to document compliance with applicable statutes and regulations (40 CFR Part 7). We estimate that this requirement imposes 8 burden hours on the recipient and 1 burden hour on EPA.

- (2) Programmatic Advanced Monitoring - 40 CFR Sections 30.50, 30.52, and 31.42 (for awards made prior to December 26, 2014) and 2 CFR Sections 200.328 through 200.330 (for awards made on or after December 26, 2014) require EPA project officers to perform reviews that pertain to programmatic components of assistance agreements. This type of evaluation focuses on reviewing information that can help assess recipients' activities and progress toward meeting the goals and objectives outlined in the assistance agreements. Programmatic reviews also ensure that the work to be performed under the agreement is on schedule, within budget, and consistent with the agreements' relevant programmatic regulation and/or programmatic terms and conditions. During the reviews, EPA project officers may request that recipients provide required information that is missing or incomplete. For those who complete these reviews, we estimate 3 burden hours on the recipient and 1 burden hour on EPA.

The extent of the information gathered and reviewed through this type of instrument will vary according to the size and scope of each agreement. Complex agreements that involve large financial grants and entail extensive staffing and complex tasks will require a greater degree of review and evaluation. Regardless of the size or complexity of the assistance agreement, the review instrument creates a framework that allows EPA to ensure the sound and effective management of assistance agreements.

- (3) Interim and Final Progress Reports - 40 CFR Sections 30.51 and 31.40 (for awards made prior to December 26, 2014) and 2 CFR Sections 200.301, 200.302, and 200.329 (for awards made on or after December 26, 2014) require recipients to submit interim and final progress reports. Interim progress reports are collected quarterly, semi-annually, or annually, based on the schedule along which progress on project activities can be documented and reported; this varies based on program objectives and goals.

Respondents will report information in line with program objectives, Agency strategic goals, and their work plans. Categories of information that may be collected (as relevant and feasible) include: activities, locations, timelines/dates, output measures, audiences, partners, and outcome measures.

EPA uses the interim progress reports to determine progress in relation to the approved schedule and milestones during the project and for other management purposes. Tracking progress at regular intervals during a project enables EPA to identify and address issues in a timely manner, thus ensuring responsible stewardship of public funds and transparent accountability to the American public. Collection of this information also facilitates the review and dissemination of success stories, lessons learned, and best practices in real time, thus contributing to learning and improvement across projects within an assistance program. EPA uses the final progress reports to ensure that recipients achieved the activities outlined in their work plans.

We estimate that this requirement imposes a total of 7 burden hours on the recipient (to prepare, complete, and submit each Progress Report) and 4 burden hours on EPA (to review and process the collected information).

- (4) Work Plans - 40 CFR Sections 35.104 and 35.107 and 2 CFR Part 200 require states and territories to submit work plans for Continuing Environmental Program (CEP) grants. Under 2

CFR Part 200, Subpart C and Appendix I, EPA requires applicants for competitive and noncompetitive Funding Opportunities to submit work plans as part of their applications. The work plan component (also referred to as the “project narrative”) provides applicants the opportunity to explain what the proposed activities will achieve, and how the proposed activities align with EPA’s strategic goals.

As part of the work plan, program offices may seek information from applicants describing the specific outputs and outcomes intended (as defined in EPA Order 5700.7A1), as well as the qualities and characteristics of the applicants that will enable them to achieve project objectives and advance program goals. Work plans serve as a scope of work for the assistance agreement. They identify environmental goals and objectives and may provide an overview (as relevant and feasible) of planned activities, locations, timelines/dates, output measures, audiences, partners, and outcome measures.

EPA uses work plans for various purposes: (a) confirm that recipients have a feasible and appropriate plan for spending the funds; (b) identify and address potential risks for projects; (c) establish a baseline against which to track progress; and (d) other management purposes. Such information can be used by the program to assess applicants’ ability to accomplish the work described, and thereby support EPA’s mission and strategic objectives

We estimate that this requirement imposes a total of 9.5 burden hours on the recipient (to prepare, complete, and submit the work plan) and 4 burden hours on EPA (to review and process the collected information).

- (5) DBE Fair Share Objectives - In an effort to ensure that Minority Business Enterprise (MBE) and Women Business Enterprise (WBE) receive a "fair share" of procurement opportunities funded by EPA financial assistance agreements, it is required that all financial assistance recipients, unless exempt under 40 CFR 33.411, negotiate objectives/goals for MBE/WBE utilization. A fair share objective is a goal based on the capacity and availability of qualified, certified MBEs and WBEs in the relevant geographic market for the grant recipient in the procurement categories of construction, equipment, services and supplies compared to the number of all qualified entities in the same market for the same procurement categories. 40 CFR Part 33, Subpart D requires recipients to negotiate a Fair Share Objective within 120 days after acceptance of financial assistance awards, except if exempted under 40 CFR 33.411. No specific forms are associated with this activity, but we estimate that this requirement imposes a total of 265 burden hours on the recipient and 8 burden hours on EPA.

EPA Form Requirements

- (1) EPA Form 190-F-04-001, “EPA Payment Request,” is used to request payment from EPA for assistance agreements. We estimate that this form imposes 0.5 burden hours on the recipient and 0.5 burden hours on EPA.
- (2) EPA Form 190-F-05-001, “Fellowship Stipend Payment Enrollment Form,” is completed by fellowship recipients to enable the Treasury Department to transmit payment data, by electronic means, to a financial institution. We estimate that this form imposes 0.5 burden hours on the recipient and 0.5 burden hours on EPA.

- (3) EPA Form 4700-4, "Preaward Compliance Review Report for All Applicants and Recipients Requesting Federal Financial Assistance," is used to collect information that enables EPA to determine whether applicants are developing projects, programs, and activities on a non-discriminatory basis. We estimate that this form imposes 0.5 burden hours on the applicant and 0 burden hours on EPA.
- (4) EPA Form 5700-52A, "MBE/WBE Utilization Under Federal Grants and Cooperative Agreements," is completed by recipients of federal grants, cooperative agreements, or other federal financial assistance which involve procurement of supplies, equipment, construction, or services to accomplish federal assistance programs. We estimate that this form imposes 1.5 burden hour on the recipient and 1 burden hour on EPA.
- (5) EPA Form 5700-53, "Lobbying and Litigation Certification for Grants and Cooperative Agreements," is completed at project completion to certify that funds have not been used to engage in the lobbying of the federal Government or in litigation against the United States. We estimate that this form imposes 5 minutes of burden on the recipient and 5 minutes of burden on EPA.
- (6) EPA Form 5700-54, "Key Contacts Form," and EPA Form 5700-54-2, "Key Contacts Form for Multiple Principal Investigators." These forms are used to collect contact information for individuals responsible for various aspects of the proposed work, including authorized representative, payee, administrative contact, and investigators. A recipient must complete either form as applicable. We estimate that this form imposes 0.5 burden hours on the applicant and 0 burden hours on EPA.
- (7) EPA Form 5770-2, "Fellowship Application," is the basic application form for individuals seeking fellowships and requires information on the applicant's educational and work experience background. We estimate that this form imposes 3 burden hours on the applicant and 3 burden hours on EPA.
- (8) EPA Form 5770-3, "Fellowship Facilities and Commitment Statement," requires information about the institution that will sponsor the fellowship applicant, the sponsor's summarized plans for the applicant's training, and the institution's commitment to provide that training. We estimate that this form imposes 1 burden hour on the applicant and 1 burden hour on EPA.
- (9) EPA Form 5770-5, "Agency Fellowship Certification," is used by applicants who are current or prospective employees of a regional, state, or local environmental pollution control or regulatory agency. The form asks the agency director or designee for the kind of help (financial, leave of absence, etc.) the agency will be providing the applicant if the applicant receives an EPA fellowship. We estimate that this form imposes 0.5 burden hours on the applicant and 0.5 burden hours on EPA.
- (10) EPA Form 5770-7, "EPA Fellowship Activation Notice," is used by EPA to inform EPA's Regional Services Staff to begin payment on the fellowship award. We estimate that this form imposes 0.5 burden hours on the recipient and 0.5 burden hours on EPA.

- (11) EPA Form 5770-8, "Fellowship Agreement," contains the terms of the fellowship agreement and is used by the applicant to formally accept an EPA fellowship. We estimate that this form imposes 1 burden hour on the recipient and 1 burden hour on EPA.
- (12) EPA Form 5770-9, "Completion of Studies Notice," is used to officially terminate the fellowship. The form requires the recipient to provide EPA with two reprints of any publication work done under the fellowship, when applicable, and asks for constructive criticism from the recipient or his sponsor on EPA's fellowship program. We estimate that this form imposes 1 burden hour on the recipient and 1 burden hour on EPA.
- (13) EPA Form 6600-01, "Limited Scope Administrative and Financial Review Questionnaire for EPA Assistance Agreement Desk Reviews," is used by EPA to conduct Pre-Award Certification and Administrative Advanced Monitoring (Post-Award). The questionnaire requests information about an organization's administrative and financial policies, procedures, accounting, and management of EPA assistance agreements. EPA uses the information to determine if recipients are in compliance with government-wide and EPA-specific rules, regulations, and guidelines promulgated in the various OMB Circulars, Code of Federal Regulations, and Agency directives. Additionally, it is reviewed to determine if recipients have good business practices, such as consistently applied policies and procedures that safeguard the management and use of federal funds. The form provides the Agency with information needed to conduct and complete its statistical analyses and evaluation of recipients. Note that under this ICR renewal, EPA is discontinuing the use of EPA Form 6600-09, "EPA Administrative Capability Questionnaire," and plans to use EPA Form 6600-01 to conduct both Pre-Award Certification and Administrative Advanced Monitoring (Post-Award). We estimate that this form imposes 30 burden hours on the recipient and 40 burden hours on EPA.
- (14) EPA Form 6600-06, "Certification Regarding Lobbying," is completed by grant applicants and contains certifications about the use of federal appropriated funds in connection with lobbying, as specified. The form is used by EPA to confirm that no funds have been used for lobbying activities and, if applicable, to direct the recipient to complete Standard Form-LLL, Disclosure Form to Report Lobbying." We estimate that this form imposes 0.25 burden hours on the recipient and 5 minutes of burden on EPA.
- (15) EPA Form 6600-08A, "Certificate of Indirect Costs for State & Local Governments." The form is completed by state, local, and tribal grant recipients and contains the certification that costs in proposals to establish billing or final indirect cost rates are allowable in accordance with the requirements of the federal award(s) to which they apply and the provisions of 2 CFR Part 200 Subpart E-Cost Principles. We estimate that this form imposes 0.25 burden hours on the recipient and 10 minutes of burden on EPA.
- (16) EPA Form 6600-08B, "Lobbying Indirect Cost Certificate for Non-Profit Organizations" and "Certificate of Indirect Costs for Indirect (F&A) Cost Rate for Non-Profit Organizations." The form is completed by non-profit organization to certify that the organization has complied with the requirements and standards pertaining to lobbying costs in accordance with 2 CFR Part 200. It also contains the certification that costs in proposals to establish billing or final indirect cost rates are allowable in accordance with the requirements of the federal award(s) to which they

apply and the provisions of 2 CFR Part 200 Subpart E-Cost Principles. We estimate that this form imposes 0.25 burden hours on the recipient and 10 minutes of burden on EPA.

- (17) NCEER Form 5, "EPA Office of Research and Development Current and Pending Support," is used to determine whether the principal investigator has available capability to handle the additional workload proposed by EPA under research grants. We estimate that this form imposes 0.5 burden hours on the applicant and 0.25 burden hours on EPA.

Common Form Requirements (*burden not included in this ICR; burden already reported to OMB through Request for Common Form (RCF) process*)

- (1) SF 270, "Request for Advance or Reimbursement." This is the standard form prescribed for recipients to use to request advances or reimbursement on all non-construction programs when the advance payment or reimbursement methods are used. This form is approved under OMB Control Number 2130-0615 (DOT). We estimate that this form imposes 1 burden hour on the recipient and 1.5 burden hours on EPA.
- (2) SF 424, "Application for Federal Assistance," is used by states, local governments, and federally recognized Indian Tribal governments to apply for federal financial assistance. SF-424 requires basic information about the applicant (name, address, telephone number, type of applicant, etc.), including a list of sources of proposed funding and a description of the proposed project. Supplemental information is provided in SF-424A, "Budget Information - Non-Construction Programs," SF-424C, "Budget Information - Construction Programs," and/or SF-424D, "Assurances - Construction Programs," as applicable. These forms are approved under OMB Control Number 2130-0615 (DOT). We estimate that the SF 424 imposes 1.1 burden hours on the recipient and EPA, the SF-424A imposes 3 burden hours on the recipient and EPA, the SF-424C imposes 3 burden hours on the recipient and EPA, and the SF-424D imposes .25 burden hours on the recipient and EPA.
- (3) SF 425, "Federal Financial Report," is used by applicants to submit reports on their assistance agreement's financial progress. This form is approved under OMB Control Number 2130-0615 (DOT). We estimate that this form imposes 1.5 burden hours on the recipient and 1.5 burden hours on EPA.
- (4) SF 428, "Tangible Personal Property," is used by recipients to report on tangible personal property (equipment and supplies) when required by a federal financial assistance award. Supplemental information is provided in SF-428A, "Annual Report," SF-428B, "Final Report," and SF-428C, "Disposition Request/Report." These forms are approved under OMB Control Number 4040-0018 (EGOV). We estimate that these forms impose 2.75 burden hours on the recipient and 2.75 burden hours on EPA.
- (5) SF 429, "Real Property Status Report," is used by recipients of federal financial assistance to report real property status or to request agency instructions on real property that was/will be provided as Government Furnished Property (GFP) or acquired (i.e. purchased or constructed) in whole or in part under a federal financial assistance award. Supplemental information is provided in SF-429A, "General Reporting," SF-429B, "Request to Acquire, Improve or Furnish," and SF-429C, "Disposition or Encumbrance Request," as applicable. We estimate that this form imposes 4 burden hours on the recipient and 4 burden hours on EPA.

- (6) The SF LLL, "Disclosure of Lobbying Activities," is used by applicants to disclose lobbying activities that have been secured to influence the outcome of a federal action (e.g., contract, grant, cooperative agreement, etc.). This form is approved under OMB Control Number 2130-0615 (DOT). We estimate that this form imposes 10 minutes of burden on the recipient and 0 burden hours on EPA.
- (7) "EPA Current and Pending Other Support Form," is used to assess the capacity or any conflicts of commitment that may impact the ability of an applicant to carry out a proposed research effort. This is a new EPA form that solicits information under the authority of the National Science Foundation Act of 1950, as amended, and is approved under OMB Control Number 3145-0279. The information on this form will be used in connection with the selection of qualified proposals. We estimate that this form imposes 2 burden hours on the applicant and 1 burden hour on EPA.
- (8) "EPA Biographical Sketch Form," is used to collect a biographical sketch for each individual identified as a senior/key person on a federally funded research project. This is a new EPA form that solicits information under the authority of the National Science Foundation Act of 1950, as amended, and is approved under OMB Control Number 3145-0279. The biographical sketch is used to assess how well qualified the individual, team, or organization is to conduct the proposed research activities. We estimate that this form imposes 2 burden hours on the applicant and 1 burden hour on EPA.

3. USE OF TECHNOLOGY

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.

Grants.gov, originally called the E Grants Initiative, was a mandate of the President's Fiscal Year 2002 Management Agenda, which directed agencies to "...allow applicants for Federal Grants to apply for and ultimately manage grant funds online through a common Web site, simplifying grants management and eliminating redundancies."

Grants.gov implements the requirement in the Federal Financial Assistance Management Improvement Act, Public Law 106 107, to develop a simple, unified source to electronically find, apply, and manage grant opportunities. Grants.gov is the central federal electronic portal created in response to the Act.

Grants.gov Workspace allows an applicant to create an application package from an opportunity posted on Grants.gov. The applicant can complete the application within Workspace or download the application forms and complete the package offline based on agency instructions. The application package generally includes a standard set of OMB approved forms. After an applicant completes the required application package, they can be submitted electronically to Grants.gov, which transmits the application to the funding agency.

The Office of Grants and Debarment has constructed an electronic repository for Pre-Award activities within the Agency's Next Generation Grants System (NGGS) which receives, as the funding agency, the

applications data and stores them for program retrieval and review. As applications are selected for funding, the data will be migrated and processed through other downstream activities within NNGS for eventual award.

EPA requires the use of Grants.gov as the EPA standard for the submission of initial applications for competitive and non-competitive assistance agreement awards.

4. EFFORTS TO IDENTIFY DUPLICATION

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.

This ICR requests reauthorization for the collection of information that is currently only collected through this ICR. Otherwise, there is currently no mechanism for minimum management requirements for all recipients of EPA grants or cooperative agreements (assistance agreements) with respect to the set of instruments and methodologies outlined in this ICR and the uses outlined in this ICR. EPA has determined that this information is not currently held by EPA or any other federal agency.

5. MINIMIZING BURDEN ON SMALL BUSINESSES AND SMALL ENTITIES

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

EPA believes the reporting requirements discussed in this ICR cannot be further reduced for, and do not place an unreasonable burden on, small entities. EPA requires the information requested to make award decisions, properly manage assistance agreements, maintain records, and monitor performance. This requested information may, in some cases, be dependent on the type of entity (e.g., state agency, non-profit organization, individual, etc.) but is not dependent on an entity's relative size. EPA takes active steps to minimize the burden on all entities by providing guidance materials and using electronic forms. In most cases, the requirements do not impose a large burden on small entities because the information required is simple and straightforward.

6. CONSEQUENCES OF LESS FREQUENT COLLECTION

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 effect of less frequent collection is that EPA would be unable to comply with OMB or statutory requirements for assistance agreements. Rational and fair grant awards would be extremely difficult to make, and financial and technical managerial information would not be available for assessing the status of grant efforts.

7. GENERAL GUIDELINES

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

The information collection is consistent with the guidelines set forth in 5 CFR 1320(d)(2) of the Paperwork Reduction Act.

8. PUBLIC COMMENT AND CONSULTATIONS

8a. Public Comment

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.

An initial public notice was published in the *Federal Register* on September 28, 2023 (88 FR 66840) announcing that EPA was taking comments on this collection for sixty days. No comments relevant to the ICR were received.

8b. Consultations

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.

To evaluate the accuracy of its burden estimates, EPA consulted with the following assistance agreement recipient organizations:

Nancy Bartter
Hawaii State Department of Health
Nancy.bartter@doh.hawaii.gov

Larry W Huffman
Confederated Tribes of Coos, Lower Umpqua, & Siuslaw Indians
Lhuffman@ctclusi.org

Kristi Marshall
Cow Creek Band of Umpqua Tribe of Indians
Kmarshall@cowcreek-nsn.gov

Based on input received from the organizations above, it was determined that minor adjustments to the burden associated with three of the EPA assistance agreement requirements were appropriate as outlined below:

- Grant work plans - increased burden per response from 6 to 9.5 hours
- Submit Interim and Final Progress Reports - increased burden per response from 6.5 to 7 hours
- EPA Form 5700-52A, "MBE/WBE Utilization Under Federal Grants and Cooperative Agreements" - increased burden per response from 1 to 1.5 hours

9. PAYMENTS OR GIFTS TO RESPONDENTS

Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

Aside from the federal financial assistance awarded to successful applicants, no payments or gifts are provided to respondents.

10. ASSURANCE OF CONFIDENTIALITY

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.

No pledge of confidentiality is given for applicant responses.

11. JUSTIFICATION FOR SENSITIVE QUESTIONS

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.

Questions about sensitive issues that are normally considered private (e.g., religious beliefs, sexual attitudes, and behavior) will not be included in the information collections covered by this ICR.

12. RESPONDENT BURDEN HOURS & LABOR COSTS

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

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Generally, estimates should not include burden hours for customary and usual business practices.*
 - If this request for approval covers more than one form, provide separate hour burden estimates for each form and the aggregate the hour burdens.*
 - 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 as O&M costs under non-labor costs covered under question 13.*
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12a. Respondents/NAICS Codes

The primary recipients of EPA assistance agreements are state and local governments, Indian Tribes, educational institutions, and not-for-profit institutions. The corresponding North American Industry Classification System (NAICS) Codes for respondents include, but are not limited to, 61111, 61131, 813212, 813219, 813311, 813312, 813319 and 92119. The estimated number of annual respondents is presented below.

Type of Information	Number of Respondents
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Competitive Applications	2,430
Non-Competitive Applications	992
Existing Grant Recipients	6,389
Fellowship Applications	10
TOTAL	9,821

12b. Information Requested

General information about the information is described under Q2 – Practical Utility. The individual data fields used in each instrument can be reviewed by consulting the instrument files included with this ICR submission.

12c. Respondent Activities

Information Collection Requirement	A	B	C	D	E	F
	Actions per Year	Submissions per Agreement	Burden Hours per Action	Total Burden Hours for Recipients	Burden Hours per Action for EPA	Total Burden Hours for EPA
Record Keeping - 40 CFR Sections 30.50, 30.52, and 31.42 (for awards made prior to December 26, 2014) and 2 CFR Sections 200.301, 200.302, and 200.328 through 200.330 (for awards made on or after December 26, 2014)	6,389	1	8	51,112	1	6,389
Completion of Project Officer Protocol/Programmatic Advanced Monitoring - 40 CFR Sections 30.50, 30.52, and 31.42 (for awards made prior to December 26, 2014) and 2 CFR Sections 200.328 through 200.330 (for awards made on or after December 26, 2014)	204	1	3	612	1	204

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	Actions per Year	Submissions per Agreement	Burden Hours per Action	Total Burden Hours for Recipients	Burden Hours per Action for EPA	Total Burden Hours for EPA
Submit Interim and Final Progress Reports - 40 CFR Sections 30.51 and 31.40 (for awards made prior to December 26, 2014) and 2 CFR Sections 200.301, 200.302, and 200.329 (for awards made on or after December 26, 2014)	6,389	4	7	178,892	4	102,224
Grant Work Plans - 40 CFR Sections 35.104 and 35.107 and 2 CFR Part 200 requires states and territories to submit work plans for Continuing Environmental Program (CEP) grants. Under 2 CFR Part 200, Subpart C and Appendix I, EPA requires applicants for competitive and noncompetitive Funding Opportunities to submit work plans as part of their applications	4,914	1	9.5	46,683	4	19,656
DBE Fair Share Objectives	38	1	265	10,070	8	304
EPA Form 190-F-04-001, "US EPA Payment Request"	6	12	0.5	36	0.5	36
EPA Form 190-F-05-001, "Fellowship Stipend Payment Enrollment Form"	5	1	0.5	3	0.5	3
EPA Form 4700-4, "Preaward Compliance Review Report for All Applicants and Recipients Requesting Federal Financial Assistance"	3,422	1	0.5	1,711	0	0
EPA Form 5700-52A, "MBE/WBE Utilization Under Federal Grants and Cooperative Agreements"	3,499	1	1.5	5,249	1	3,499
EPA Form 5700-53, "Lobbying and Litigation Certificate"	2	1	0.0833	0	0.0833	0

Information Collection Requirement	A	B	C	D	E	F
	Actions per Year	Submissions per Agreement	Burden Hours per Action	Total Burden Hours for Recipients	Burden Hours per Action for EPA	Total Burden Hours for EPA
EPA Form 5700-54, "Key Contacts Form" and EPA Form 5700-54-2, "Key Contacts Form for Multiple Principal Investigators"	3,422	1	0.5	1,711	0	0
EPA Form 5770-2, "Fellowship Application"	10	1	3	30	3	30
EPA Form 5770-3, "Fellowship Facilities and Commitment Statement"	10	1	1	10	1	10
EPA Form 5770-5, "Agency Fellowship Certification"	10	1	0.5	5	0.5	5
EPA Form 5770-7, "EPA Fellowship Activation Notice"	5	1	0.5	3	0.5	3
EPA Form 5770-8, "Fellowship Agreement"	5	1	1	5	1	5
EPA Form 5770-9, "Completion of Studies Notice"	5	1	1	5	1	5
EPA Form 6600-01, "Limited Scope Administrative and Financial Review Questionnaire for EPA Assistance Agreement Desk Reviews"	175	1	30	5,250	40	7,000
EPA Form 6600-06, "Certification Regarding Lobbying"	1,925	1	0.25	481	0.083	160
EPA Form 6600-08A, "Certificate of Indirect Costs For State & Local Governments"	80	1	0.25	20	0.17	14

Information Collection Requirement	A	B	C	D	E	F
	Actions per Year	Submissions per Agreement	Burden Hours per Action	Total Burden Hours for Recipients	Burden Hours per Action for EPA	Total Burden Hours for EPA
EPA Form 6600-08B, "Lobbying Indirect Cost Certificate for Non-Profit Organizations" and "Certificate of Indirect Costs for Indirect (F&A) Cost Rate for Non-Profit Organizations"	50	1	0.25	13	0.17	9
NCER Form 5, "Current and Pending Support"	262	1	0.5	131	0.25	66
TOTAL	30,827			302,030		139,620

12d. Respondent Burden Hours and Labor Costs

EPA estimates that the labor mix involved in the reporting and recordkeeping activities associated with this collection will be made up primarily of grant managers and clerical staff. Estimated loaded labor rates for these labor categories are as follows.

- Managerial Wage Rate¹ $\$51.62 \times 1.43 = \73.82 .
- Clerical Wage Rate² $\$21.78 \times 1.43 = \31.15 .

As shown in the table above, the total annual burden hours for respondents is estimated to be 302,030.

EPA estimates that 80% of these 302,030 hours will be used by management-level staff for respondents (241,624 hours at a rate of \$73.82) and the remaining 20% by secretarial/clerical staff (60,406 hours at a rate of \$31.15). The weighted average hourly rate for respondents is \$65.29.

Therefore, the total annual labor cost burden for respondents is $302,030 \times \$65.29 = \$19,719,538$.

¹ \$51.62 was derived from the median hourly wage for Bureau of Labor Statistics "Occupational Employment and Wages: Management Occupations" available at <https://www.bls.gov/oes/current/oes110000.htm> (accessed 3/11/2024). A multiplier (in this case, 1.43) is used to "load" basic wages with the additional costs of benefits and overhead incurred by respondents as part of their overall labor costs.

² \$21.78 represents the average hourly wage rate of two administrative/clerical positions. This figure was derived from the median hourly wage for Bureau of Labor Statistics' Occupational Employment and Wages: Information and Record Clerks" available at <https://www.bls.gov/oes/current/oes434199.htm> (\$21.50) and "Occupational Employment and Wages: Bookkeeping, Accounting, and Auditing Clerks" available at <https://www.bls.gov/oes/current/oes433031.htm> (\$22.05) (accessed 3/11/2024). A multiplier (in this case, 1.43) is used to "load" basic wages with the additional costs of benefits and overhead incurred by respondents as part of their overall labor costs

13. RESPONDENT CAPITAL AND O&M COSTS

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).

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 consider 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 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. 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.

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.

There are no anticipated capital or O&M costs for respondents to these collections. The equipment and non-labor services required to respond to EPA requests will already be in place as part of usual and customary business practices.

14. AGENCY COSTS

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.

14a. Agency Activities

As summarized in the table above, the total annual burden hours for EPA is estimated to be 139,620.

14b. Agency Labor Cost

EPA estimates that staff at the GS 11, Step 9 level will conduct grant management activities (\$80.39³). Therefore, the total annual cost for EPA is 139,620 x \$80.39 = \$11,224,052.

14c. Agency Non-Labor Costs

No capital or O&M costs are anticipated.

15) REASONS FOR CHANGE IN BURDEN

³ Labor costs were based on a GS 11, Step 9 using OPM's 2024 general scale with Washington D.C. locality adjustments available at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/23Tables/html/DCB_h.aspx (accessed 3/11/2024). The customary multiplier of 1.6 was used to "load" basic wages with the additional costs of benefits incurred by the Agency as part of its overall labor costs.

Explain the reasons for any program changes or adjustments reported in the burden or capital/O&M cost estimates.

The overall respondent burden has increased from the previous ICR by 207,424 hours. This change occurred for several reasons. First, EPA received unprecedented levels of funding to award grants under the American Rescue Plan (ARP), the Bipartisan Infrastructure Bill (BIL), and the Inflation Reduction Act (IRA). This led to a significant increase in number of grant applications received and awards made under various EPA grant programs. EPA also revised its approach to more accurately estimate the number of ongoing grant recipients who are subject to the requirements for record keeping and submittal of quarterly progress reports, which resulted in a significant increase in burden under those requirements (which was also due to the increase in annual grant awards since the last ICR). Based on this review, EPA made significant adjustments to the estimated total number of respondents as outlined in the table above.

In addition, EPA reviewed the burden assumptions in the ICR to ensure that they reflect the Agency's current experiences under its grant programs. EPA made adjustments to increase the burden hour estimates for three of the requirements based on consultations with grant recipients, as outlined in section 8. The result of the adjustment changes due to the revisions in respondents and burden estimates are outlined in the following table.

Adjustment Changes	Total Respondent Hours	Change from 2021 ICR
Keep records, including addition of DBE requirements	51,112	38,408
Programmatic Advanced Monitoring	612	-33
Submit Interim and Final Progress Reports	178,892	137,604
Grant Work Plans	46,683	30,729
EPA Form 190-F-04-001, "US EPA Payment Request"	36	-9,492
EPA Form 4700-4, "Preaward Compliance Review Report for All Applicants and Recipients Requesting Federal Financial Assistance"	1,711	192
EPA Form 5700-52A, "MBE/WBE Utilization Under Federal Grants and Cooperative Agreements"	5,249	4,828
EPA Form 5700-53, "Lobbying and Litigation Certificate"	0	-1
EPA Form 5700-54, "Key Contacts Form" and EPA Form 5700-54-2, "Key Contacts Form for Multiple Principal Investigators"	1,711	192

EPA Form 6600-01, "EPA Administrative and Financial Onsite Review Questionnaire"	5,250	4,740
EPA Form 6600-06, "Certification Regarding Lobbying"	481	414
EPA Form 6600-08A, "Certificate of Indirect Costs for State & Local Governments"	20	-1
EPA Form 6600-08B, "Lobbying Indirect Cost Certificate for Non-Profit Organizations" and "Certificate of Indirect Costs for Indirect (F&A) Cost Rate for Non-Profit Organizations"	13	-3
EPA Form 6600-09, "EPA Administrative Capability Questionnaire"	0	-156
NCER Form 5, "Current and Pending Support"	131	3
Subtotal: Adjustment Changes		207,424

16) PUBLICATION OF DATA

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.

Results from this ICR are not published formally. They are used to calculate agency-level accomplishments and site-specific impacts on publicly available EPA websites.

17) DISPLAY OF EXPIRATION DATE

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 agency plans to display the expiration date for OMB approval of the information collection on all instruments.

18) CERTIFICATION STATEMENT

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

This information collection complies with all provisions of the Certification for Paperwork Reduction Act Submissions.