

U.S. Environmental Protection Agency Information Collection Request

Title: *Environmental Justice Thriving Communities Grantmaking Program: Applications for Subawards – August Launch*

OMB Control Number: 2035-NEW

EPA ICR Number: 7780.01

Abstract

To meet the goals and objectives that demonstrate the U.S. Environmental Protection Agency (EPA's) and the Administration's commitment to achieving environmental justice and embedding environmental justice into Agency programs, EPA released the Thriving Communities Grantmaking Program funding opportunity. The program will provide about \$600 million in 11 cooperative agreements funding to "Grantmakers" who will function as pass-through entities for the Environmental Justice Thriving Communities Subgrants (2 CFR Parts 200 and 1500). The pass-through model removes the requirement of applying through the federal grants process and decreases the amount of time it takes to award federal funds. The Grantmakers will collaborate with EPA to design and build their own processes to receive and evaluate applications to fund the initial development of community-led environmental justice projects. With this Information Collection Request (ICR), EPA seeks emergency clearance for two Grantmakers to solicit applications for their first round of subgrants to be launched in August 2024. If the information requested under this emergency clearance were not collected, EPA would have no mechanism for selecting and distributing subaward grants. Without this activity, the central programmatic objectives of the Environmental Justice Thriving Communities Grantmaking Program cannot be met. The six-month emergency clearance period will cover the first round of subaward applications that will be solicited by three Grantmakers in August 2024. Subsequent rounds of applications for these two Grantmakers will be authorized via a Standard ICR package for the Grantmaking Program that will be submitted for review via the customer ICR approval process.

Total (6 Month) Respondent Burden & Costs

Respondents	Burden Hours	Labor Costs	Non-Labor Costs	Total Costs
300	1,400	\$74,242	25,330	99,572

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.

Legal and Administrative Requirements

The U.S. Environmental Protection Agency (EPA) makes competitive financial assistance awards to support projects that tackle environmental, public health, and energy challenges across the country. To help expand historically underserved and overburdened communities' access to these critical resources, environmental justice leaders have long called for more accessible federal grant funding for communities that removes the long and bureaucratic barriers of the federal grants registration and application process (i.e., Grants.gov and SAM.gov). Leaders have also called for federal funding to be dispersed more quickly to community-based and grassroots organizations, whose long-term effectiveness and sustainability relies in large part on timely funding.

In direct response to this feedback EPA has used part of its funding from the 2022 Inflation Reduction Act (IRA) to establish the Thriving Communities Grantmaking Program (Grantmaking Program) funding opportunity, drawing on expanded authority to further environmental justice provided by Congress in the Consolidated Appropriations Act, 2022 (Public Law 117-103). The Grantmaking Program supports [Executive Order 13985](#), *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government* (issued on January 20, 2021), which announced Administration policy that the federal government should pursue a comprehensive approach to advancing equity for all, including communities that have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality. The Grantmaking Program also supports [Executive Order 14008](#), *Tackling the Climate Crisis at Home and Abroad* (issued on January 27, 2021), which reinforced the Administration's commitment to advance environmental justice.

The Grantmaking Program will provide about \$600 million in 11 cooperative agreements funding to "Grantmakers" who will function as pass-through entities for the Thriving Communities Subgrants (2 CFR Parts 200 and 1500). The Grantmakers will distribute competitive and noncompetitive subawards to subrecipients who will further activities in assessment, planning, and project development to address local environmental and/or public health issues. Grantmakers will provide Environmental Justice Thriving Communities Subgrants (i.e., subawards) to eligible subrecipients ranging from \$75,000 up to a maximum of \$350,000. Eligible entities¹ will apply to a Grantmaker for a subgrant to fund a range of environmental project activities for periods of up to three years. These projects will help transform disadvantaged and underserved communities into healthy, thriving communities capable of addressing their historical and ongoing environmental and public health challenges, as well as any future challenges they may face.

¹ Eligible subrecipients include community based nonprofit organizations, Puerto Rico, U.S. Territories and Freely Associated States, Native American organizations, local governments, and institutions of higher education. At time of award the subrecipient will need a current Unique Entity Identifier in SAM.gov.

Section 138 of the Clean Air Act guides the availability of the grant funds and the associated timeline of funding use. Specifically, Grantmakers have thirty-six (36) months to distribute all subaward funds. In order to maximize access to subawards for potential subgrantees, EPA bifurcated (i.e., split) the Grantmakers total award into two parts:

- (i) an *initial award* that enables Grantmakers to perform the tasks needed to establish and carry out the proposed participatory governance, outreach, and system mobilization efforts for establishing the subgrants; and
- (ii) a *subsequent award* for the remainder of the funds, most of which will be distributed to subaward recipients via subgrants.

Necessity of this Collection

In order to distribute subawards, the Grantmakers must solicit applications from eligible entities. These information collections will enable the Grantmakers to verify the eligibility of the applicants for the subaward; the alignment between the proposed project and the goals of the Environmental Justice Thriving Communities Subgrants Program and the EPA; and the feasibility and appropriateness of the planned activities and outcomes given the proposed budget, staffing plan, partners, and other aspects of the plan.

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.

EPA requests emergency clearance for two Grantmakers to solicit applications from eligible entities for subawards beginning August 1, 2024:

Grantmaker A

- Application for Competitive Awards
- Application for Noncompetitive Awards

Grantmaker B

- Application for all Awards

The Subgrants Program will be advertised through various channels, such as announcements on the Grantmakers' websites, newsletters, and social media accounts; emails sent to different list-servs; announcements at webinars and in-person events; and word of mouth through networks.

Each Grantmaker will offer applicants multiple options for completing and submitting their applications, including a written online application, a written paper/hard copy application, a verbal application, or a video application. The aim is to enable applicants to select the submission method that is most suitable and convenient for their circumstances, thus reducing the burden needed to provide the requested information.

The collected information will be used to select and distribute subaward grants. The application materials will request the following information: background information about the applicant organization; description of the proposed project including goals, activities, and expected outcomes; budget, staffing plan, and partners.

The six-month emergency clearance period will cover the first round of subaward applications that will be solicited by three Grantmakers in August 2024. Subsequent rounds of applications for these two Grantmakers will be authorized via a Standard Information Collection Request package for the Grantmaking Program, to be submitted in October 2024.

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.

The Grantmakers will employ information technology as appropriate to reduce the burden of respondents who wish to complete a funding application. Each Grantmaker will offer applicants multiple options for completing and submitting their applications, including a written online application, a written paper/hard copy application, a verbal application, or a video application. The aim is to enable applicants to select the submission method that is most suitable and convenient for their circumstances, thus reducing the burden needed to provide the requested information.

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 authorization for the collection of information that is not currently collected and otherwise would not be collected. Each Grantmaker is producing bespoke application materials, so that their subaward program may address the priorities, needs, and goals of the specific communities they serve. There is currently no mechanism for this type of information collection, with respect to the set of instruments and methodologies outlined in this ICR. EPA has determined that this information is not currently held by EPA or any other federal agency. In particular, the bespoke application materials designed by the Grantmakers are distinct in format and content from the federal application materials that are authorized for use via the General Administrative Requirements for Assistance Programs ICR (OMB Control Number [2030-0020](#)).

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 has considered whether to establish different application requirements for small businesses and other small entities and has determined that:

1. Different application requirements among applicants will result in inconsistent data that may reduce the Grantmakers ability to select and distribute subaward grants;
2. The burden imposed by this information collection is relatively small and small entities should not be unduly burdened by the reporting requirement; and
3. The Environmental Justice Thriving Communities Subgrants Program is voluntary and eligible entities who elect to apply have determined that the expected benefits of participation outweigh any burden associated with preparing the responses.

Each Grantmaker has designed the content, format, and collection method of the application in order minimize burden on respondents as much as possible. For instance, the forms are formatted uniformly, to clearly indicate which fields need to be completed. Where appropriate, dropdown menus have been added to ease the burden on applicants entering information. Finally, forms have been written in such a way to clearly indicate when, where, and what kind of response is required through the implementation of field-by-field instructions and adoption of if-then statements where appropriate.

Each Grantmaker will offer applicants multiple options for completing and submitting their applications, including a written online application, a written paper/hard copy application, a verbal application, or a video application (details in Sections 2 and 3). The aim is to enable applicants to select the submission method that is most suitable and convenient for their circumstances, thus reducing the burden needed to provide the requested information.

Furthermore, each Grantmaker will provide support to eligible entities who request help in providing the requested information.

5. 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.

If the information requested under this emergency clearance were not collected, EPA would have no mechanism for selecting and distributing subaward grants. Without this activity, the central programmatic objectives of the Environmental Justice Thriving Communities Grantmaking Program cannot be met. This will significantly undermine efforts to carry out EPA's and the Administration's commitment to design and implement environmental justice projects that deliver relevant and useful benefits to local communities have been historically underserved and overburdened by pollution and other environmental problems.

6. GENERAL GUIDELINES

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

Information collections for the TCTAC Program will be conducted in accordance with the Paperwork Reduction Act [Title 5 of the *Code of Federal Regulations* (CFR) section 1320.5(d)(2)] and will adhere to OMB's general guidelines for information collections. There are no known special circumstances that would require reporting on an alternative timeline or methodology.

7. 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.

EPA will publish a notice in the *Federal Register* to announce the Agency's intention to request emergency clearance from OMB for this information collection activity. This notice will provide a 14-day period for public comment (Docket ID EPA-HQ-OEJECR-2024-0297).

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.

The Grantmakers developed estimates of burden hours and costs based on their knowledge of overseeing similar grant programs in the past, as well as consultations with fewer than nine organizations who represent the range of eligible entities that are likely to apply for subaward grants. These consultations included discussions concerning potential response problems, clarity of questions and instructions, and other aspects of respondent burden.

8. PAYMENTS OR GIFTS TO RESPONDENTS

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

No payments or gifts will be provided to respondents who complete and submit applications for subaward funds.

9. 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.

The application materials will request personally identifiable information (PII), such as the primary contact person's name and contact information. All private data will be handled in accordance with 40 CFR 122.7, 40 CFR Part 2, and EPA's *Security Manual* Part III, Chapter 9, dated August 9, 1976. Any claim of confidentiality must be asserted at the time of submission.

To ensure privacy in data collection and records management, staff will undertake training on data privacy and records management; shall protect respondent privacy to the extent permitted by law; and will comply with all Federal and Agency regulations for private information. In particular, applications will be stored in secure locations (e.g., password-protected computer or locked cabinets) that can only be accessed by authorized persons. When the submitted applications are being reviewed and evaluated, discussions will include only authorized persons and will take place in secure locations where privacy can be maintained.

Summaries of application numbers and success rates will be publicly reported in anonymous and aggregated form, in order to protect any personally identifiable information and confidential business information that is submitted.

10. 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.

The information collection activities covered by this ICR will not include questions about sensitive issues (e.g., religious beliefs, sexual attitudes and behavior).

The application materials will collect standard demographic information (e.g., gender, race/ethnicity,) about the leadership of applicant organizations so that the Grantmakers can track the extent to which a broad range of entities are submitting applications for funding.

11. 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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Total Hour Burden (six months) = 1,400 hours

Total Labor Cost (six months) = \$74,212

12a. Respondents/NAICS Codes

Respondents will include entities who are eligible to receive subawards, who are covered by the following NAICS codes:

- 813410 (Civic and Social Organizations)

- 921120 (Local Governments)
- 611210 (Junior Colleges)
- 611310 (Colleges, Universities, and Professional Schools)

12b. Information Requested

The application materials will request the following information: background information about the applicant organization; description of the proposed project including goals, activities, and expected outcomes; budget, staffing plan, and partners.

12c. Respondent Activities

Respondents will prepare, complete, and submit the information requested in the application materials.

12d. Respondent Burden Hours and Labor Costs

The table below includes the information calculated in each step of the methodology, with the total burden hours and costs presented in the bottom row. The Notes (on the subsequent page) provide additional information about each step, and the Appendix includes the calculations and reference sources for Steps 1 and 2.

Activity	1. Burden per Response (Hours) ¹	2. Weighted Labor Cost per Response (Dollars) ²	3. Number of Responses (6 months) ³	4. Total Burden Hours (6 months) ⁴	5. Total Labor Cost (6 months) ⁵
Prepare, Complete, and Submit GGHI Application	6	\$318.18 (hourly = \$53.03)	100	600 hours	\$31,818
Prepare, Complete, and Submit SEE Application for Noncompetitive Awards	4	\$212.12 (hourly = \$53.03)	100	400 hours	\$21,212
Prepare, Complete, and Submit SEE Application for Competitive Awards	4	\$212.12 (hourly = \$53.03)	100	400 hours	\$21,212
6. TOTALS for 6 months⁶				1,400 hours	\$74,242

Notes for Table:

1. **Column 1** = Number of burden hours spent on each response across all staff roles at relevant levels of seniority. For full calculations, please see **Table 12.1 in the Appendix**.

2. **Column 2** = Weighted labor cost for each response based upon percentage of staff labor at different levels of seniority. For full calculations and reference sources for loaded wage rates, please see **Tables 12.2 and 12.3 in the Appendix.**
3. **Column 3** = Expected number of responses for six months, based on estimates from Grantmakers.
4. **Column 4** = Total burden hours, calculated by multiplying the burden hours per response (Column 1) by the number of responses (Column 3).
5. **Column 5** = Total labor cost, calculated by multiplying the weighted labor cost per response (Column 2) by the number of responses (Column 3).
6. **Row 6 = Totals for six months** = Sum of total hours and costs, for all instruments.

12. 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.

Capital and Start-Up Costs

There are no specified capital or start-up costs for eligible entities to complete the application materials for the Environmental Justice Thriving Communities Subgrants Program. Applicants should already have the standard equipment (e.g., computer, relevant software packages) and infrastructure (e.g., workspace, access to internet services) that is required to collate, store, and report the required information. No specialist equipment or infrastructure is needed to complete the application materials.

The Grantmakers will incur capital and start-up costs for designing and setting up the applications:

- Grantmaker A = \$8,250 for contractor to design and set up the online application portal for first six months. Contractor selected after receiving three quotations.
- Grantmaker B = \$7,156 for contractor to design and set up the web landing page, web portal, and application software.

All systems and equipment are expected to last for the six months covered by this emergency clearance.

Total capital and start-up costs for Grantmakers = 15,406

Operation and Maintenance and Purchase of Services

Applicants are not expected to incur any specified operation or maintenance costs to complete the application materials for the Environmental Justice Thriving Communities Subgrants Program. This is because they can use the standard equipment and infrastructure that they use for other aspects of their work. No specialist equipment or infrastructure is needed to complete the application materials.

Grantmaker B has identified \$9,924 in operating costs for the six months covered by this Emergency ICR. The longer-term operating costs (i.e., for the three years of the grant) will be presented in the standard ICR package that will cover subsequent rounds of applications for the subgrants.

Total operation costs for Grantmakers = 9,924

13. 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.

The solicitation of applications for the Environmental Justice Thriving Communities Subgrants Program will not produce any burden or costs for the federal government. This is because the Grantmakers will be the ones who review and process the information collected via the application materials.

15) REASONS FOR CHANGE IN BURDEN

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

This is a new collection.

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.

Information collected under this ICR will be used to support Grantee activities in three ways:

1. Information collected in the application materials will be used to select awardees and distribute funds. Each Grantmaker will evaluate applications against a set of criteria and standards.
2. To enable transparent public examination of the Subgrant Program, Grantmakers may post aggregate and anonymous summaries of application numbers and selection rates will be reported in anonymous and aggregated form in order to protect any personally identifiable information and confidential business information that is submitted.
3. To provide examples of successful applications, Grantmakers may seek permission to publicly post anonymized excerpts of funded applications (with permission from the application).

16) 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.

All instruments will display the expiration date for OMB approval of the information collection.

17) CERTIFICATION STATEMENT

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

EPA does not seek any exceptions to the topics for the certification statement identified in the "Certification for Paperwork Reduction Act Submissions."

Appendix

Calculations for Section 12: Respondent Burden Hours & Costs

Step 1: Calculate proportion of respondent burden hours across all staff roles at relevant levels of seniority.

TABLE 12.1: PROPORTION of Respondent Hours			
Number of Hours: Management	Number of Hours: Technical	Number of Hours: Clerical/Support	Total Proportion
0.15	0.7	0.15	1

Step 2: Calculate weighted labor cost across all staff roles involved.

TABLE 12.2: LOADED WAGE RATES for Respondents Wage rate + 110% loading for account for costs of benefits and overhead			
Wage Rate/Hour: Management	Wage Rate/Hour: Technical	Wage Rate/Hour: Clerical/Support	Wage rates obtained from the Bureau of Labor Statistics (BLS) for civic and social organizations .
\$96.31 (General and Operations Managers)	\$50.80 (Social Scientists and Related Workers)	\$42.27 (Secretaries and Administrative Assistants)	

TABLE 12.3: WEIGHTED and LOADED LABOR COSTS for Respondents	
Weighted and Loaded Hourly Labor Cost	Explanation of Calculations
\$53.03	Weighted and Loaded Hourly Labor Cost = (Loaded Wage rate * proportion of hours) calculated for each respondent group (management, technical, clerical/support) and summed.

Total burden calculations (hours and costs) are shown in Section 12.