

# U.S. Environmental Protection Agency

## Information Collection Request

**Title:** GGRF Accomplishment Reporting

**OMB Control Number:** 2090-NEW

**EPA ICR Number:** 2783.01

**Abstract:** This ICR covers the collection of information from those organizations that receive grant funding from the Environmental Protection Agency (EPA) under the authority of section 134 of the Clean Air Act (CAA). CAA 134 was enacted as part of the Inflation Reduction Act (IRA) and authorizes EPA to make competitive grants to states, municipalities, Tribal governments, and eligible non-profit recipients to implement the Greenhouse Gas Reduction Fund, a historic \$27 billion investment to combat the climate crisis by mobilizing financing and private capital for greenhouse gas- and air pollution-reducing projects in communities across the country. Within the GGRF, EPA designed three programs.

### **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 is a new Information Collection Request (ICR). This ICR covers the collection of information from those organizations that receive grant funding from the Environmental Protection Agency (EPA) under the authority of [Section 134 of the Clean Air Act \(CAA\)](#). CAA 134 was enacted as part of the Inflation Reduction Act (IRA) and authorizes EPA to make competitive grants to states, municipalities, Tribal governments, and eligible non-profit Recipients to implement the Greenhouse Gas Reduction Fund (GGRF). GGRF is a historic \$27 billion investment to combat the climate crisis by mobilizing financing and private capital for greenhouse gas- and air pollution-reducing projects in communities across the country. CAA 134 requires that EPA obligate the \$27 billion in grant funding by September 30, 2024. This ICR covers the collection of information under awards for all three GGRF grant programs: the National Clean Investment Fund, the Clean Communities Investment Accelerator, and the Solar for All program. EPA will use information from these reports as part of program-wide public reporting.

- The \$14 billion **National Clean Investment Fund (NCIF)** will finance clean technology deployment nationally. Specifically, it will provide grants to 3 national non-profit financing entities to create national clean financing institutions capable of partnering with the private sector to provide accessible, affordable financing for tens of thousands of clean technology projects nationwide.

Recipients will invest in projects, activities, and technologies that reduce emissions of greenhouse gases and other air pollutants that harm communities and contribute to climate change. Qualified projects under NCIF exist in diverse sectors of the economy, including electricity, transportation, and buildings. The three priority project categories are: 1) distributed energy generation and storage; 2) net zero-emissions buildings; and 3) zero-emissions transportation [note: other types of greenhouse-gas-reducing projects may also be eligible for financing]. Projects will also be deployed by diverse segments of the population, including consumers, small businesses, low-income and disadvantaged community-led businesses, Native American-owned businesses, women-owned businesses, and community/locally owned businesses. Project will be deployed in geographically diverse communities, including rural communities, Tribal communities, and low-income and disadvantaged communities, including those that are also communities with environmental justice concerns, energy communities, and persistent poverty counties.

- The \$6 billion **Clean Communities Investment Accelerator (CCIA)** will finance clean technology deployment in low-income and disadvantaged communities while simultaneously building the capacity of community lenders that serve those communities. Specifically, CCIA will provide grants to 5 hub non-profit entities that will provide funding and technical assistance to “community lenders,” which include public, quasi-public, not-for-profit, and non-profit entities providing financial assistance to qualified projects at the state, local, territorial or Tribal level or in the District of Columbia, including community-and low-income focused lenders and capital providers. The CCIA program supports the development of a broad network of community lenders so that communities across the country have access to the financial capital they need to deploy clean technology projects in homes, small businesses, schools, and community institutions.

Qualified projects under CCIA **must** fall within three priority project categories: distributed energy generation and storage, net-zero emissions buildings, and zero-emissions transportation. Additionally, all financial assistance funds must be directed to low-income and disadvantaged communities.

- The \$7 billion **Solar for All (SFA)** program will spur adoption of clean distributed solar energy that lowers energy bills for millions of Americans in low-income and disadvantaged communities. Specifically, it will provide 60 grants to states, territories, Tribal governments, municipalities, and eligible non-profit entities to expand the number of low-income and disadvantaged communities primed for distributed residential solar investment—enabling millions of low-income households to access affordable, resilient, and clean solar energy (and storage).

SFA recipients will provide subsidies and other financial assistance to residential rooftop and residential-serving community solar projects in, and benefiting, low-income and disadvantaged communities. Additionally, a portion of SFA funds can be used for project deployment technical assistance such as workforce development, community outreach, and other project-deployment support (e.g., interconnection technical assistance, siting and permitting support) to help overcome barriers to solar deployment.

The information collected under this ICR supplements data collection covered under OMB Control Number [2030-0020](#), EPA's *General Administrative Requirements for Assistance Agreements*. OMB Control Number [2030-0020](#) covers the minimum reporting and record keeping requirements that Recipients are subject to under [2 CFR Part 200](#), Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, and [2 CFR Part 1500](#), Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. With this ICR, EPA seeks authorization to collect a comprehensive set of data points on projects and transactions funded by GGRF programs, as well as financial and organizational health data, and quality assurance information. EPA seeks authorization to collect this data via a specified set of reporting templates that will streamline the data collection effort and improve the quality of information collected, including:

- A project and transaction data reporting template and data dictionary
- Progress report templates
- Organizational disclosure template

EPA believes it reasonable to expect that all parties who voluntarily respond to this information collection by electing to participate in the GGRF program have determined that the expected benefits of participation outweigh any burden associated with preparing the response.

## **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.*

---

While the EPA collects basic grant Recipient information as part of its federal stewardship responsibilities to manage and oversee Recipient activities and expenditures, EPA requires additional information from Recipients on details of projects and transactions, financial and organizational health data, and quality assurance information, to be reported in a consistent manner to evaluate the effectiveness of the GGRF program and to report on program activities and accomplishments to Congress and other program stakeholders. EPA will use the information collected from Recipients to oversee the activities carried out using GGRF funds, to evaluate program implementation and effectiveness, and to meet the EPA's responsibilities under the Government Performance and Results Act for reporting on GGRF program accomplishments. The information collected will be used to ensure compliance with grant terms and conditions and statutory requirements specified in CAA 134. Without the information collection, EPA would have limited access to information needed to effectively assess the relationship between those activities funded by the GGRF grants and the intent of Congress with the passage of the Inflation Reduction Act.

In accordance with 2 CFR § 200.329, each Recipient will be subject to program performance reporting requirements. EPA will use information from these reports as part of program-wide public reporting as well as in response to Freedom of Information Act (FOIA) requests, except to the extent such information includes confidential business information (CBI) or personally

identifiable information (PII) pursuant to 2 CFR § 200.338.<sup>1</sup>. The administrative data collected under this ICR may be used as part of other analytical studies as appropriate. EPA will submit additional ICR packages to seek authorization for program evaluation studies that involve additional collections of information beyond those outlined in this ICR.

### **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.*

---

Recipients will submit transaction and project information reporting information electronically to EPA in machine-readable format such as Excel files (using the report template included in Appendix D.) and narrative report information in Word files by email or upload to a website.

EPA is currently working to develop an integrated reporting system for storage and processing of information. The system, called Transaction and Project System (TAPS) is under development. The development of this system will enhance efficiency of reporting and processing of reported information. There will be no change in the information collected when it is completed.

EPA will allow Recipients to charge the grant awards for costs that support data reporting to ensure that respondents with limited resources are able to comply with reporting requirements without undue burden.

### **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.*

---

There is no other known source for the scope of information that EPA seeks under this ICR. Moreover, this ICR supplements, and does not duplicate, the information that EPA collects as part of its reporting and record keeping provisions under the EPA's grant requirements by introducing a specified set of reporting templates and a comprehensive set of information that will be authorized for collection to track outputs and outcomes of grants awarded under GGRF programs. This ICR addresses the burden imposed on Recipients and EPA associated with the reporting requirements that are unique to grants awarded by EPA under authority of GGRF programs.

### **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.*

---

This information collection request is expected to affect Recipients and subrecipients of GGRF funding. EPA has considered whether to establish different reporting requirements for small

---

<sup>1</sup> Information claimed as CBI in accordance with this Notice will be disclosed only to the extent, and by means of the procedures, set forth in 40 C.F.R. Part 2, Subpart B.

entities and has determined that: (1) different reporting requirements among Recipients will result in inconsistent data that may lessen the EPA's ability to oversee and report on program activities and accomplishments; (2) the GGRF program is voluntary and parties who elect to participate in this program have determined that the expected benefits of participation outweigh any burden associated with preparing the response.

## **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 information collection schedule is consistent with the Agency's reporting schedule for general assistance agreements. Less frequent collection would lessen GGRF's ability to report up-to-date and accurate information on program activities and accomplishments and thereby limit the Agency's ability to oversee and manage GGRF grants effectively.

## **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 guidelines.

## **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.*

---

EPA published a notice in the *Federal Register* on February 6, 2024 (89 FR 8198), soliciting comments and information on the proposed collection.

Additional information on the comments and the Agency's response is provided in Appendix A.

### **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.*

EPA consulted with nine applicants, three from each of the three GGRF programs to ask them specific questions about the burden associated with completing the data collection covered in this ICR. Recipient responses form the basis of EPA's calculations of the burden hours and costs.

These consultations included discussions concerning potential response problems, clarity of questions and instructions, and other aspects of respondent burden.

Common themes the applicants touched upon include: the need to standardize a level of uniformity in data collection, measurement and reporting; requests to eliminate certain reporting, change the cadence of reporting, or extend the deadlines for submission of reports; the need for a ramp up period for certain elements of reporting; and requests for less extensive reporting for smaller projects.

EPA considered the public comments and feedback from consultation meetings received and made the following changes:

- Streamlined reporting forms where possible; for example, eliminated and combined fields in narrative reports.
- Planned for an extension of the first reporting period to allow a ramp up to reporting.
- Reduced the frequency of narrative reporting from quarterly to semi-annual. and some transaction and project reporting. EPA maintained quarterly transaction and project reporting for NCIF participants and reduced frequency to semi-annual for CCIA and SFA participants.
- Allowed, upon formal request to the EPA, up to 60 days to report transaction and project data and semi-annual progress reports.
- Convened workshops with selectees to provide further opportunity for input into development of data points and systems that would be feasible and reduce burden on Recipients as well as subrecipients to the extent possible.
- Developed additional guidance on data points, particularly for Greenhouse Gas (GHG) and air pollution reductions.

More details on feedback from consultation are provided in Appendix A.

## **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.*

---

EPA will use information from these reports as part of program-wide public reporting, except to the extent such information includes CBI or PII pursuant to 2 CFR § 200.338. Information claimed as CBI will be disclosed only to the extent, and by means of the procedures, set forth in 40 CFR Part 2, Subpart B.

All data systems used to store data collected via these reports will be stored in IT systems that meet or exceed EPA's current policies and guidelines regarding security and privacy. Additionally, personal identifiers will not be used to retrieve specific information in these systems.

## **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, 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.*
- 

### **12a. Respondents/NAICS Codes**

Respondents will be the recipients of the grants under the three programs, listed below:

**NCIF:** three non-profit financing entities.

**CCIA:** five non-profit financing entities.

**SFA:** 41 states, territories, Tribal governments, and municipalities and 19 eligible non-profit entities under SFA.

Additionally, the organizational disclosure template is required of subrecipients receiving subawards greater than \$10 million under the NCIF or CCIA programs. EPA estimates 25 subrecipients will fall into this category, based on the number of Named Subrecipients receiving subawards greater than \$10 million across the two programs. These subrecipients are not-for-profit entities. Thus, the total number of respondents is 93, of which 52 are non-profit organizations, and 41 are states, territories, Tribal governments, or municipalities.

### **12b. Information Requested**

EPA will collect data from Recipients and subrecipients through several data collection instruments, described below:

- 1) Transaction and Project Data Submissions:** Metrics and information collected for individual transactions and projects conducted under the three grant programs, including:
  - a. Transaction identifiers (e.g., GGRF program ID, Recipient unique IDs from SAM.gov, etc.)
  - b. Technical assistance provider and technical assistance information.
  - c. Financial assistance provider (e.g., organization name, etc.).
  - d. Financial assistance information (e.g., financial assistance type or subtype, characteristics by subtype, origination or closing date, amount, loan status, etc.).
  - e. Counterparty/Recipient (e.g., type or subtype, characteristics by subtype, etc.).
  - f. Other pertinent information, including information specific to each program.
  - g. Project characteristics (e.g., type/subtype, characteristics by subtype, location, community type, etc.).
  - h. Project benefits (e.g., GHG and air pollution reductions, equity/community benefits, market transformation benefits).
  - i. Other pertinent information, including information specific to each program.

NCIF Recipients will submit transaction and project data quarterly, whereas CCIA and SFA Recipients will report this information semi-annually. The full list of metrics and definitions are included in Appendix C, and the machine-readable report template is included in Appendix D.

- 2) Semi-annual Performance Reports:** Written reports narrating program performance with quantitative metrics, required twice a year. These reports include information in the following areas:
  - a. Summary of key activities completed over reporting period as well as outputs, outcomes and milestones achieved over reporting period.
  - b. Plans for key activities (including current transaction pipeline) to be completed, as well as outputs and outcomes to be achieved in the next reporting period.
  - c. A description of the amount of program income held and details on how the program income is being managed and the interest earned.
  - d. Portfolio Overviews of capital available, committed and deployed in the reporting period and to date.
  - e. For NCIF, operational summaries of the share of financial assistance and technical assistance investment in low-income and disadvantaged communities in the reporting period and to date.
  - f. Labor and workforce data, including select information on an aggregated basis from the U.S. Department of Labor's [Form WH-347\(OMB No. 1235-0008\)](#). This reporting must address all open and completed projects<sup>2</sup>, encompassing all Davis-Bacon and Related Acts (DBRA)-covered construction projects assisted by GGRF funds awarded to the recipient over the applicable reporting period.
  - g. Other pertinent information, including information specific to each program.

---

<sup>2</sup> Noting that the recipient is not required to include the same summary for a completed project on its subsequent semi-annual submission.



- h. Recipients should include information on program evaluation and other evidence-building activities (e.g., written summary, links to reports) and certify that activities are in accordance with EPA Order 1000.33: U.S. EPA Policy for Evaluations and Other Evidence-Building Activities.<sup>3</sup>

Semi-Annual Narrative report the for NCIF and CCIA is included in Appendix E. and the template for SFA is included in Appendix F.

- 3) Annual Narrative Reports (NCIF/CCIA):** Written report narrating program performance, required once a year. This report will include a summary of outputs and outcomes over the period of performance and methodologies, inputs, and assumptions as well as any third-party validation, verification, and/or assurance used to track and report on outputs and outcomes. These reports must be ready for publication on the EPA website for public consumption and must not include any material that the recipient considers to be Confidential Business Information or that would violate an individual's personal privacy (e.g., salary information, home addresses, or personal email accounts). All reports will undergo an EPA review process to verify that there is no PII or CBI claims in the publishable reports. Reports submitted with CBI claims will not comply with this requirement and may result in remedial action by EPA. Should EPA identify PII in reports, EPA's Project Officer will require that the recipient re-submit the report without the PII so that it can be published without redaction.

At a minimum, reports must include the following elements:

- ❖ Progress towards objectives on key performance metrics over the reporting year.
- ❖ Summary of key activities completed in the reporting year, including case studies across different types of financial assistance and qualified projects.
- ❖ Geographic coverage of investments made in the reporting year.
- ❖ Descriptions and examples of actions the program took to meaningfully involve the communities the program serves in program design and operations.
- ❖ Case studies of different types of technical assistance/market-building activities provided.
- ❖ Plans for key activities (including current transaction pipeline) to be completed as well as outputs and outcomes to be achieved in the next reporting year.

SFA Recipients are not required to complete Annual Narrative reports.

- 4) Final Narrative Report:** Written report narrating program performance covering the entire period of performance, due within 120 calendar days after the end date of the period of performance This report will include a summary of outputs and outcomes over the period of performance and methodologies, inputs, and assumptions as well as any third-party validation, verification, and/or assurance used to track and report on outputs and outcomes. These reports must be ready for publication on the EPA website for public consumption and must not include any material that the recipient considers to be

---

<sup>3</sup> Program evaluation and other evidence-building activities will be conducted pursuant to the Paperwork Reduction Act (PRA).

Confidential Business Information or that would violate an individual's personal privacy (e.g., salary information, home addresses, or personal email accounts). All reports will undergo an EPA review process to verify that there is no PII or CBI claims in the publishable reports. Reports submitted with CBI claims will not comply with this requirement and may result in remedial action by EPA. Should EPA identify PII in reports, EPA's Project Officer will require that the recipient re-submit the report without the PII so that it can be published without redaction.

- 5) **Quality Management Plan (QMP):** Description of an organization's Quality Program, developed once and updated annually. It also documents how the organization structures its Quality Program including descriptions of its internal quality procedures for implementing and assessing the effectiveness of the program; criteria for and areas of application; and roles, responsibilities, and authorities. The QMP also documents all technical activities to be performed under the Quality Program and how the program will integrate quality assurance (QA), quality control (QC), and Quality Assurance Project Plans (QAPP) into all its environmental information operations. QMPs submitted must adhere to the standards included here: [https://www.epa.gov/system/files/documents/2024-03/quality\\_management\\_plan\\_standard.pdf](https://www.epa.gov/system/files/documents/2024-03/quality_management_plan_standard.pdf).
- 6) **Quality Assurance Project Plans (QAPP):** The QAPP is a formal planning document which describes how environmental information operations are planned, implemented, documented, and assessed during the life cycle of a project. The QAPP must be submitted once and updated annually. The QAPP describes in comprehensive detail the necessary QA and Quality Control (QC) requirements and other technical activities that must be implemented to ensure that the results of the environmental information operations performed will satisfy the stated performance and acceptance criteria. QAPPs submitted must adhere to the standards listed here: [https://www.epa.gov/system/files/documents/2024-04/quality\\_assurance\\_project\\_plan\\_standard.pdf](https://www.epa.gov/system/files/documents/2024-04/quality_assurance_project_plan_standard.pdf).
- 7) **Organizational Disclosures (NCIF/CCIA):** EPA will collect organizational information on an annual basis from NCIF and CCIA recipients, as well as any subrecipients receiving subawards greater than \$10 million. This information will be collected through a disclosure template that will list the documents and information organizations need to submit, including:
  - a. Overview, including activities and locations, risk factors, and legal proceedings;
  - b. Management's discussion and analysis of financial condition, including results of operations, critical accounting estimates, and off-balance sheet arrangements;
  - c. Governance, including information on senior management and board of directors (such as compensation, conflicts of interest, and more);
  - d. (from third year of performance onward) Organizational Greenhouse Gas (GHG) emissions, including Scope 1 and 2 emissions; relevant categories of Scope 3 emissions; and internal controls and verification;
  - e. Financial health metrics;
  - f. Other pertinent information.

SFA recipients are not required to submit organizational disclosures. The template for organizational disclosures is included in Appendix G.

- 8) SFA Drawdown Template (SFA)** EPA will collect expenditure details on a monthly basis from SFA recipients in order to track use and of funding and drawdown amounts by cost category. The SFA Drawdown Template is included in Appendix Z.

#### **12c. Respondent Activities**

Recipients will collect transaction level, project level, organizational level, and outcome data from subrecipients. Recipients will submit reporting information electronically to EPA in machine-readable CSV or human-readable Word files by email or upload to a website using the templates included in appendices D-I. The development of the machine-readable flat files should lead to the dimensional file format that will eventually enable an API.

#### **12d. Respondent Burden Hours and Labor Costs**

Average Annual Time Burden = 560,131 hours

Average Annual Labor Cost = \$28,591,027

Recipients and subrecipients of financial assistance programs incur a burden in the process of preparing, completing, and submitting performance information via the instruments below. Using feedback provided by the applicants EPA consulted with for this ICR as a basis, EPA has used its best professional judgement to develop *estimates* of burden hours and costs for each instrument, as presented in Table 1 below. The burden estimates below combine estimates for Recipient and subrecipient burden. Five consultees submitted quantitative burden estimates following the consultations. Baseline numbers for “Burden per Response” hours have been updated to account for consultee input. More details on calculations are provided in Appendix H. Response Burden Calculation.

<b>Table 1: RESPONDENT CALCULATED BURDEN &amp; COSTS</b>					
<b>Reporting Instrument</b>	<b>1. Burden per Response (Hours)</b>	<b>2. Weighted Labor Cost per Response (Dollars)</b>	<b>3. Total Number of Responses (3 years)</b>	<b>4. Total Burden Hours (3 years)</b>	<b>5. Total Cost Per Instrument (3 years)</b>
<b>1. Prepare, Complete and Submit Transaction and Project Data Submissions</b>	3585	\$182,160	426	1,527,210	\$77,600,127
<b>2. Prepare, Complete and</b>	163	\$8,619	408	66,300	\$3,516,509

<b>Semi-annual Performance Reports</b>					
<b>3. Prepare, Complete and Submit Annual Narrative Reports</b>	669	\$34,869	24	16,044	\$836,863
<b>4. Prepare, Complete and Submit Final Narrative Report</b>	498	\$27,118	68	33,864	\$1,844,036
<b>5. Prepare, Complete and Submit QMP</b>	213	\$11,594	32	6,816	\$371,002
<b>6. Prepare, Complete and Submit QAPP</b>	317	\$17,104	68	21,556	\$1,163,102
<b>7. Prepare, Complete and Submit Organizational Disclosures</b>	329	\$16,869	24	7,884	\$404,868
<b>7. Prepare, Complete and Submit SFA Drawdown Template</b>	1	\$51	720	720	\$36,575
<b>6. TOTALS for all three years</b>				1,680,394	\$85,773,081
<b>7. ANNUALIZED TOTALS per year</b>				560,131	\$28,591,027

### 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.

---

Using estimates provided by the applicants EPA consulted with for this ICR as a basis, EPA has used its best professional judgement to develop *estimates* of the total annual non-labor cost burden, as outlined below.

Capital or start-up costs for Recipients to meet EPA's performance reporting requirements may vary. Some respondents are expected to 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 for the information requested. Others may invest in developing systems to streamline data collection. Respondents consulted for this ICR noted data management platforms, Davis-Bacon and Related Acts (DBRA) compliance and reporting software, and the purchase of other software user accounts as anticipated upfront costs. Based on estimates provided by respondents to the ICR consultation, EPA's preliminary estimate of annualized start-up costs for Recipients is: **\$8,859,143** across the three programs. These costs are primarily expected for NCIF and CCIA respondents, who indicated higher expected capital or start-up costs than SFA respondents during consultation.

#### **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**

EPA will use information from these reports as part of program-wide public reporting. GGRF will post information from these reports on EPA public websites. EPA will collate program-level information for inclusion in public reports such as the Annual Performance Report mandated by the Government Performance and Results Act (GPRA) and annual reports on progress of activities supported by supplemental funds (e.g., Inflation Reduction Act). Additionally, EPA will use this information to respond to requests from the Executive and Legislative branches for data and information.

##### **14b. Agency Labor Cost**

Average Annual Time Burden = 10,927 hours

Average Annual Labor Costs = \$873,940

EPA has used its best professional judgement to develop estimates of burden hours and costs for review and processing of each instrument across the three programs, as presented in Table 2. EPA estimates that four FTE will be needed to manage and process data and for systems maintenance. Project Officers will review quarterly, annual, and final progress reports. A Quality Assurance Manager will review and approve quality assurance documents. More details on calculations are provided in Appendix H. Response Burden Calculation.

<b>Table 2: EPA CALCULATED BURDEN &amp; COSTS</b>					
<b>Reporting Instrument</b>	<b>1. Burden per Response (Hours)</b>	<b>2. Weighted Loaded Labor Cost per Response (Dollars)</b>	<b>3. Total Number of Responses (3 years)</b>	<b>4. Total Burden Hours (3 years)</b>	<b>5. Total Cost Per Instrument (3 years)</b>
<b>1. Prepare, Complete and Submit Transaction and Project Data Submissions</b>	<i>Estimated as four FTE</i>			24960	\$2,125,594
<b>2. Prepare, Complete and Semi-annual Performance Reports</b>	10	\$635	408	4080	\$258,900
<b>3. Prepare, Complete and Submit Annual Narrative Reports</b>	10	\$635	24	240	\$15,229
<b>4. Prepare, Complete and Submit Final Narrative Report</b>	10	\$635	68	680	\$43,150
<b>5. Prepare, Complete and Submit QMP</b>	20	\$1,269	55	1100	\$69,802
<b>6. Prepare, Complete and Submit QAPP</b>	20	\$1,269	40	800	\$50,765
<b>7. Prepare, Complete and Submit</b>	10	\$635	20	200	\$12,691

<b>Organizational Disclosures</b>					
<b>8. Prepare, Complete and Submit SFA Drawdown Template</b>	1	\$63	720	720	\$45,688
<b>6. TOTALS for all three years</b>				32,780	\$2,621,820
<b>7. ANNUALIZED TOTALS per year</b>				10,927	\$873,940

Loaded salary costs were calculated using the [U.S. Office of Personnel Management Salary Table 2024-DCB](#), for employees based in the Washington, DC metropolitan area.

#### **14c. Agency Non-Labor Costs**

EPA incurs a burden in the process of reviewing and processing the information collected via the instruments covered by this ICR. Transaction and Project data will be processed in an internal database to be developed, minimizing the ongoing burden of review and processing. The upfront costs for database development are estimated to be \$800,000.

#### **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, and so does not involve any program changes or burden adjustments.

#### **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.*

To enable more transparent public examination of federally funded activities, the information collected under this ICR will be published in three ways:

- GGRF will post it on EPA public websites.
- EPA will collate program-level information for inclusion in public reports such as the Annual Performance Report mandated by the Government Performance and Results Act (GPRA) and annual reports on progress of activities supported by supplemental funds (e.g., Bipartisan Infrastructure Law, Inflation Reduction Act).
- EPA will use this information to respond to requests from the Executive and Legislative branches for data and information.

Information will be reported in anonymous and aggregated form where necessary to protect CBI and PII. Location identifiers will be used to fulfill federal reporting requirements (e.g., DATA Act, Justice40 Initiative) to document results in different communities. EPA will follow best practices in stating the source of the data (e.g., grant progress reports) and the methodology used to collect the information (e.g., self-report).

#### **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.”*

---

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

#### **Appendices:**

Appendix A: Summary of Public Comment and Consultation

Appendix B: Extract IRA SECTION 60103 – GREENHOUSE GAS REDUCTION FUND

Appendix C: Transaction and Project System Data Dictionary

Appendix D: Transaction and Project System Flat File Templates (included as instrument file)

Appendix E: NCIF and CCIA Semi-annual Progress Report Template (included as instrument file)

Appendix F: SFA Semi-annual Progress Report Template, SFA (included as instrument file)

Appendix G: Organizational Disclosure Template (included as instrument file)

Appendix H: Response Burden Calculations

Appendix Z: SFA Drawdown Report Template (included as instrument file)