

# U.S. Environmental Protection Agency Information Collection Request

**Title:** General Performance Reporting for Assistance Programs

**OMB Control Number:** 2090-NEW

**EPA ICR Number:** 2802.01

## Abstract

The U.S. Environmental Protection Agency (EPA) awards billions of dollars in funding for grants and other assistance agreements, with recipients ranging from small non-profit organizations to large state governments. With this Information Collection Request (ICR), EPA seeks authorization to collect information to track progress by the Agency's assistance programs. Collection of this information from award recipients enables EPA to assess and manage its assistance programs, which in turn ensures responsible stewardship of public funds; rigorous evidence-based learning and improvement; and transparent accountability to the American public. The information requested under this ICR will be collected via performance report forms, including work plans, interim reports, and final reports.

## Total (3-Year) Respondent Burden & Costs

Responses	Burden Hours	Labor Costs	Non-Labor Costs	Total Costs
12,169	252,144	\$20,462,909.58	\$0	\$20,462,909.58

## 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.*

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#### Overview

The U.S. Environmental Protection Agency (EPA) awards billions in funding for grants and other assistance agreements, with recipients ranging from small non-profit organizations to large state governments. Assistance awards make up roughly 50 percent of EPA's base budget and about 85 percent of its supplemental funds budget (e.g., Bipartisan Infrastructure Law, Inflation Reduction Act), and thus play a significant role in achieving the Agency's mission of protecting human health and the environment. EPA's assistance awards fund activities that produce outcomes across several important domains: environmental (e.g., number of acres of coastline restored); human health (e.g., community asthma rates); behavior change (e.g., individual or organizational recycling behaviors); community and social benefits (e.g., access to green spaces); and economic benefits (e.g., job creation, workforce development).

With this Information Collection Request (ICR), EPA seeks authorization to collect information to track progress made by the Agency's assistance programs, with respect to *effectiveness* (e.g., the extent to which projects achieve their objectives, goals, and targets), *efficiency* (e.g., the extent to which projects deliver activities and outputs on schedule and within budget), and *equity* (e.g., the extent to which project investments and benefits flow to disadvantaged communities that are marginalized, underserved, and overburdened by pollution). Collection of this information enables EPA to assess and manage its assistance programs, which in turn ensures responsible stewardship of public funds; rigorous evidence-based learning and improvement; and transparent accountability to the American public.

The information requested under this ICR will be collected via performance reporting forms (performance work plans, interim performance reports, final performance reports) submitted by recipients of assistance awards, which document their planned and actual milestones, activities, timelines/dates, locations, partners, audiences, outputs, and outcomes (as relevant and appropriate).

#### Legal and Administrative Requirements

##### *Performance Reporting Forms*

The collection of information to assess and manage assistance programs fulfills various legal and administrative requirements:

1. EPA's *general regulation for assistance programs* establishes the minimum management requirements for recipients of EPA assistance programs. The reports submitted by recipients of assistance programs under this ICR fulfill the information collection and reporting requirements included in EPA regulations 2 CFR Parts [200](#), and [1500](#); and 40 CFR [Part 35](#).

2. The *Government Performance and Results Modernization Act of 2010* ([GPRA-Mod](#)) requires agencies to set goals, measure performance against those goals, and report publicly on progress. As a mechanism to achieve this goal, agencies must build and publish an Annual Performance Report (APR), which includes measurable goals, targets, and actuals from the prior fiscal year for all EPA programs. EPA publishes the APR each year alongside the Congressional Justification submitted to the Office of Management and Budget (OMB). Information collected by assistance programs via reports from recipients will be included in the APR.
3. The *Digital Accountability and Transparency Act of 2014* ([DATA Act](#)) requires the federal government to transform its spending information into open data, and link federal contract, loan, and grant spending information to federal programs to enable more transparent public examination of federal spending. To enable public scrutiny of federal investments, EPA's assistance programs need to collect information from recipients about the location of each funded project and its associated place of performance.
4. The *Foundations for Evidence-Based Policymaking Act of 2018* ([Evidence Act](#)) provides a federal framework for agencies to work with stakeholders to promote a culture of continuous learning, and decision-making using the best available evidence. It asks agencies to (1) produce measures and indicators; (2) use data to improve day-to-day operations; (3) advance the rigorous use of evidence as a routine part of planning and budget development; and (4) incorporate evidence in decision-making and reporting. Information collected by assistance programs from recipients will help develop an evidence base to address the effectiveness, efficiency, and equity of these programs' activities, which in turn will address needs related to organizational learning, ongoing program management, performance management, strategic management, interagency and private sector coordination, internal and external oversight, and accountability.
5. [Justice40](#) is a whole-of-government initiative that represents a commitment to direct 40% of the overall benefits of certain Federal investments to disadvantaged communities that are marginalized, underserved, and overburdened by pollution. As per [OMB Guidance M-21-28](#), EPA programs that are covered by this initiative are required to report: (1) investments that go to disadvantaged communities; (2) program outcomes and benefits for disadvantaged communities; and (3) community engagement and stakeholder consultation with disadvantaged communities and their partners. To fulfill the reporting requirements regarding the location of investments and benefits, EPA's assistance programs need to collect information from recipients about the location of each funded project and its area of impact, at the appropriate and feasible level of specificity.

#### *Labor and Workforce Metrics Forms*

EPA's Investing in America (IIA) programs will create and fund thousands of jobs across the country. The success of EPA's investments relies on having the skilled, trained workforce needed to deliver these projects. Based on these considerations, and in alignment with the Administration's priorities, EPA has taken steps to incorporate workforce and labor priorities into the design of IIA funding opportunities. In

order to monitor and track the extent to which these priorities are being successfully implemented, EPA has developed a labor and workforce reporting framework that includes three reporting instruments:

- (1) Aggregate Davis Bacon and Related Acts Reporting
- (2) “Good jobs” metrics
- (3) Workforce training outcomes

One or more of the above-listed instruments will be used for data collection by six of the Agency’s priority IIA programs:

1. Solar for All (Instrument 1)
2. National Clean Investment Fund (Instrument 1)
3. Clean Communities Investment Accelerator (Instrument 1)
4. Environmental Justice Community Change Grants (Instruments 1, 2, and 3)
5. Clean Ports Program (Instrument 3)
6. Clean Heavy Duty Vehicles Grant Program (Instrument 3)

The collection of labor and workforce metrics are in line with several actions and executive orders which have directed federal agencies, including EPA, to incorporate job quality and workforce development priorities into IIA program design and reporting. These include, but are not limited to:

- [Biden-Harris Administration Roadmap to Support Good Jobs](#)
- [Scaling and Expanding the Use of Registered Apprenticeships in Industries and the Federal Government and Promoting Labor-Management Forums](#) (Registered Apprenticeship EO)
- [Implementation of the Energy and Infrastructure Provisions of the Inflation Reduction Act of 2022](#) (IRA EO)
- [Use of Project Labor Agreements for Federal Construction Projects](#) (PLA EO)
- [Increasing Access to High-Quality Care and Supporting Caregivers](#) (Care EO)
- [Worker Organizing and Empowerment](#) (Labor EO)
- [Revitalizing Our Nation’s Commitment to Environmental Justice for All](#) (EJ EO)

## Utility of this ICR

EPA recently completed an enterprise-level analysis of more than 400 assistance programs, with the aim of understanding how each program tracks grantee progress towards meeting work plan commitments including outputs and outcomes. Results identified a series of best practices that all assistance programs should adopt: (1) collect information about the full range of activities, outputs, and outcomes linked to current program objectives; (2) collect location data for projects and benefits, in line with federal requirements; and (3) use technology where appropriate when collecting information in order to reduce burden on recipients and improve data quality.

This ICR plays an integral role in this enterprise-level effort by providing a framework for coordinated post-award information collections that are characterized by:

1. *Systematic information collections* with clearly defined categories of information (e.g., activities, outputs, and outcomes linked to current program objectives; for details see Section 2, “Practical

Utility/Users of the Data”);

2. *Standardized information* gathered and organized in a systematic collection aligned with current legal and administrative reporting requirements (e.g., 2014 DATA Act, Justice40 Initiative), such as location data (for details see previous part of Section 1, “Legal and Administrative Requirements,” above); and
3. *Streamlined methodology for collecting information*, with an emphasis on using technology where feasible and appropriate (for details, see Section 3, “Use of Technology”).

Taken together this enterprise-level approach should clarify reporting expectations for grantees (regarding what to report and in how much detail) and offer consistent verified guidance, which together should reduce grantee burden.

This ICR has been written to authorize the collection of different categories of information, and thus the general performance reporting forms can be used by the full range of assistance programs at EPA. The Agency expects the general forms to be used by new assistance programs that will be stood up at the Agency over the next 18 to 24 months (e.g., with supplemental sources of funding, such as the Inflation Reduction Act). EPA also expects the general performance reporting forms to be used by existing assistance programs who need to make changes to their collection instruments or methodologies in line with the enterprise-level pivot toward systematization, standardization, and streamlined reporting requirements for recipients (as outlined above).

This ICR submission is necessary because it authorizes a broader range of information collection instruments and methods than are covered by existing general and generic ICRs at EPA, including the *General Administrative Requirements for Assistance Programs* ICR (OMB Control Number [2030-0020](#)). See Section 4 (Efforts to Identify Duplication) for further information.

## **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.*

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### **General and Program-Specific Performance Reporting Forms**

EPA will collect performance information from recipients of assistance agreements across three instruments: (1) work plans; (2) interim performance reports; (3) final performance reports. Programs will use this information to verify that recipients are using Federal funds appropriately to comply with Federal requirements; assess the status of grant efforts; and track outcomes required for Federal reporting.

### *Performance Work Plan Forms*

States and territories are required to submit work plans for Continuing Environmental Program (CEP) grants under 40 CFR Sections 35.104 and 35.105 and 2 CFR Part 200. Per 2 CFR Sections 200.207(a), EPA requires applicants to submit work plans in their application for noncompetitive Funding Opportunities. Additionally, in accordance with 2 CFR Part 200 Appendix I, EPA requires applicants to submit work plans in their application to competitive Notice of Funding Opportunities.

Work plans serve as a scope of work for the assistance agreement. They identify the purpose(s) and objective(s) of a project as well as the expected milestones, risks, activities, timelines, locations, partners, audiences, outputs, and outcomes (if relevant). 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.

This ICR requests authorization for a *general performance work plan form* that may be used by assistance programs across the agency. The questions and standard instructions in this form will focus on broad categories of information (e.g., expected risks, planned activities, expected outputs), and thus will be kept the same across the agency. To clarify reporting expectations and reduce burden for grantees, programs that use this general form will be allowed to make the following non-substantive modifications:

- Include a set of example answers that are relevant to the type of projects funded by the program.
- Include supplemental guidance regarding what information to report and in how much detail. For instance, this might include listing a set of outputs that grantees are expected to measure and report, in line with program goals and objectives.
- Amend the drop-down menu options for some questions, in order to only retain the options that are relevant and appropriate for the program. Examples include only retaining location data types that are appropriate for the projects funded by the program.
- Designate some sections of the form as optional if they are not relevant or appropriate to the types of projects funded by the program. An example includes partners for project activities.
- If needed, revise the heading and instructions for the section asking for “additional information,” so that grantees clearly understand what they need to report.

For more information, please refer to the Instructions document for the Work Plan Form.

Furthermore, this ICR will include *eight program-specific performance work plan forms* that have been developed to obtain reports of a particular set of relevant metrics and indicators. The questions in the program-specific forms conform to the broad categories of information authorized by this ICR, as noted above.

### *Interim Performance Report Forms*

2 CFR Sections 200.301, 200.302, 200.328, and 200.329 require recipients to submit interim performance reports. Interim 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, timelines/dates, locations, partners, outputs, audiences, outcomes, and resources. EPA uses interim performance 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.

This ICR requests authorization for a *general interim performance report form* that may be used by assistance programs across the Agency. The questions and standard instructions in this form will focus on broad categories of information (e.g., outputs and outcomes), and thus will be kept consistent across all uses. To clarify reporting expectations and reduce burden for grantees, programs that use the general form will be allowed to make the following non-substantive modifications:

- Include a set of example answers that are relevant to the type of projects funded by the program.
- Include supplemental guidance regarding what information to report and in how much detail. For instance, this might include listing a set of outputs that grantees are expected to report, in line with program goals and objectives.
- Amend the drop-down menu options for some questions, in order to only retain the options that are relevant and appropriate for the program. Examples include only showing the reporting periods that correspond to the program schedule (i.e., quarterly, semi-annually, annually), and only retaining location data types that are appropriate for the projects funded by the program.
- Designate some sections of the form as optional if they are not relevant or appropriate to the types of projects funded by the program. An example include partners for project activities.
- If needed, revise the heading and instructions for the section asking for “additional information,” so that grantees clearly understand what they need to report.

For more information, please refer to the Instructions document for the Interim Performance Report Form.

Furthermore, this ICR will include *19 program-specific interim performance report forms* that have been developed to obtain reports of specific metrics and indicators from recipients. The questions included in the program-specific forms will conform to the broad categories of information authorized by this ICR, as noted above.

#### *Final Performance Report Forms*

2 CFR Sections 200.301, 200.302, 200.328, and 200.329 require recipients to submit final performance reports. Final reports will be collected at the conclusion of the project.

The final performance report summarizes the work on the project and the extent to which the recipient has met the project's objectives. Respondents may also be asked to report on any relevant intermediate and long-term outcomes that they have measured or calculated; such outcomes typically take some time to develop and thus are reported at the end of a project. Lastly, the final performance report provides an opportunity for respondents to describe any successes and challenges they experienced across the project period; results from any program evaluations or other evidence-building activities that they may have conducted; provide a final report of budget utilization; and offer any other reflections they may have.

EPA uses final performance reports to assess and report a project's performance relative to program objectives, and for other management purposes. Collection of the information also facilitates the reporting of performance metrics (e.g., on EPA's public websites or in reports to the Office of Management and Budget), thus ensuring responsible stewardship of public funds and transparent accountability to the American public. EPA may also share success stories and lessons learned with other project teams, thus contributing to learning and improvement across projects within an assistance program.

This ICR requests authorization for a general final performance report form that may be used by assistance programs across the agency. The questions and standard instructions in this form will focus on broad categories of information (e.g., outputs and outcomes), and thus will be kept consistent across all uses. To clarify reporting expectations and reduce burden for grantees, programs that use the general form will be allowed to make the following non-substantive modifications:

- Include a set of example answers that are relevant to the type of projects funded by the program.
- Include supplemental guidance regarding what information to report and in how much detail. For instance, this might include listing a set of outputs that grantees are expected to report, in line with program goals and objectives.
- Designate some sections of the form as optional if they are not relevant or appropriate to the types of projects funded by the program. An example includes results from program evaluations.

Furthermore, this ICR will include *three program-specific final performance report forms* that have been developed to obtain reports of specific metrics and indicators from recipients. The questions included in the program-specific forms will conform to the broad categories of information authorized by this ICR, as noted above.

### **Labor and Workforce Metrics Forms**

In line with the priorities outlined in the Inflation Reduction Act (IRA) and more broadly by the Biden-Harris Administration, EPA will collect labor and workforce metrics from priority IRA-funded programs across three forms: (1) Aggregate Davis Bacon and Related Acts Reporting; (2) "Good Jobs" metrics; and (3) Workforce training outcomes. This data will be used to monitor program and grantee performance and inform policy and program design decisions.



### *Aggregate Davis Bacon and Related Acts Reporting*

EPA will collect this information from Agency-funded entities required to retain worker level data for the purposes of reporting to the Department of Labor under 29 CFR Part 5.

Under Department of Labor Regulation implementing DBRA, covered entities receiving direct EPA funding or subawards in the form of subgrants or loans are required to keep worker-level records including: social security numbers, last known address, telephone number, and email address of each worker. The entities must also have records of hourly rates of wages paid, daily and weekly hours worked, and actual wages paid. Although EPA has access to these records under 2 CFR 200.337 for the purposes of conducting audits and other reviews, covered entities do not report this information to EPA.

EPA will now ask that covered entities collect and retain records for the following supplemental data fields: whether the employee is an apprentice; employees' self-reported gender, and employees' self-reported race/ethnicity.

Every six months, EPA will ask grantees to report the following aggregate data fields:

- Number of Apprentices by self-reported gender
- Number of Apprentices by self-reported race
- Number of Apprentice work hours by self-reported gender
- Number of Apprentice work hours by self-reported race
- % of total Work hours that were Apprentice hours
- Total workers by self-reported gender
- Total workers by self-reported race
- Total work hours by self-reported gender
- Total work hours by self-reported race

### *"Good jobs" Metrics*

These reporting metrics would apply for individual grant funded construction projects receiving more than \$10 million in EPA funding. EPA defines the term "individual grant funded construction projects" to generally mean EPA funded construction activities taking place at a discrete site with boundaries based on single or contiguous parcels of land that occur at the same time or sequentially without significant interruptions until the construction is complete. This is not designed for recipients or subrecipients receiving less than \$10 million. Further, the \$10 million threshold should be inclusive of all costs associated with a discrete construction project, and not only costs associated with construction.

For this form, construction should be considered to generally include, without limitation, all types of work that can be considered "construction, prosecution, completion, or repair" done by laborers and mechanics on a particular "building or work," as these terms are defined in 29 CFR § 5.2. Projects in which construction is being undertaken on multiple single-family residence are exempt from reporting.

This information will be collected every year, with the first report occurring after a general construction contractor (or the equivalent) has been identified through competitive bidding or an EPA approved sole source contract. For the reporting period, entities would be expected to report on a series of question

that reflect the eight principles of DOL's [Good Jobs Initiative](#) (Such as DEIA, Worker Empowerment, Job Security and Working Conditions, and Skills and Advancement). In our IRA program NOFOs, applicants were strongly encouraged to review these principles as well as the [good jobs toolkit](#) while developing their application.

### *Workforce Training Outcomes*

EPA will collect this information every six months from grantees who are running discrete workforce training programs using EPA funds.

This instrument has two sections, (1) Training Outcomes and (2) Training Demographics. Section 1 collects data related to the experience of participants during and after participating in the workforce training program. Section 2 collects aggregate data on the demographics of participants during and graduating the workforce training program.

### **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.*

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With this ICR, EPA is seeking approval to require funding recipients to submit information via specified performance reporting forms, which will substantially reduce the burden on respondents and EPA staff by collapsing what could be extensive written narratives into concise, specific data fields. This approach will also improve the accuracy of data collected by each grantee and the consistency of data collected across funded projects within each program.

EPA intends to offer funding and/or technical support to ensure that respondents with limited resources are able to comply with reporting requirements without undue burden.

EPA will ensure the accuracy and completeness of collected information by reviewing submissions and conducting follow-up conversations with respondents.

### **General Performance Reporting Forms**

Programs that use the general forms will choose their collection methodologies based on several factors, such as the extent to which respondents have access to resources (e.g., internet services) to engage with different methodologies. Two options are available:

1. Respondents will provide information via electronic spreadsheets submitted to EPA via email or upload to a secure EPA website.
2. Respondents will provide information via hard-copy spreadsheets submitted to EPA via postal mail, hand delivery, or fax. (Note: EPA expects this option to be rarely used.)

## **Program-Specific Performance Reporting Forms**

Assistance programs that have developed performance reporting forms via documents or spreadsheets will ask respondents to submit the electronic documents via email or uploaded to a secure EPA website. Respondents will also be allowed the option to submit the information via the delivery of hard-copy documents to EPA via postal mail, messenger service, or fax. (Note: EPA expects this option to be rarely used.)

Assistance programs that have developed an online database or dashboard will ask respondents to directly submit information into these systems.

## **Labor and Workforce Metrics Forms**

The three labor and workforce metrics reporting forms have been developed as spreadsheets for completion by grantees in relevant programs. Two collection methods will be available:

1. Respondents will provide information via electronic spreadsheets submitted to EPA via email or upload to a secure EPA website.
2. Respondents will provide information via hard-copy spreadsheets submitted to EPA via postal mail, hand delivery, or fax. (Note: EPA expects this option to be rarely used.)

## **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.*

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EPA does not currently have the general authority to use forms to collect performance data from recipients of assistance awards. This ICR authorizes a broader range of information collection instruments and methodologies than are covered by the Agency's *General Administrative Requirements for Assistance Programs ICR* (OMB Control Number [2030-0020](#)). The recipient reports authorized by the current ICR will differ from those covered by the General Administrative Requirements ICR by authorizing (i) a set of reporting forms (work plans, interim performance reports, final performance reports) for use and (ii) a broader set of collection methodologies (submission of electronic forms via to EPA email or upload to a secure website; and inputting information directly into an EPA online dashboard or database).

Furthermore, EPA does not currently collect the information that will be requested in the labor and workforce metrics reporting forms. To the Agency's knowledge, this information is not already available. Thus, there is no existing (identical or similar) information for EPA programs to use or modify for the purposes described in Section 2.

## **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.*

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This ICR is expected to affect small governmental jurisdictions, which are defined as governments of cities, counties, towns, townships, villages, school districts, or special districts with populations of less than 50,000. This definition may also include Indian Tribes, in keeping with the President's Federal Indian Policy.

EPA has considered whether to establish different reporting requirements for small entities and has decided to maintain consistent reporting requirements for all entities regardless of size, based on the following determinations: (1) different reporting requirements among recipients will result in inconsistent data that may lessen the Agency's ability to oversee and report on program activities and accomplishments; (2) different reporting requirements among recipients may create confusion about specific expectations; (3) the burden imposed by this information collection is relatively small and small entities should not be unduly burdened by the reporting requirement; and (4) the assistance programs are voluntary and respondents who elect to participate in these programs 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.*

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The information collection schedule set out in this ICR (quarterly, semi-annually, annually) is consistent with the Agency's reporting schedule for assistance programs. Less frequent collection would weaken EPA's ability to oversee and manage these assistance programs and to report up-to-date and accurate information on program activities and accomplishments.

If this information were not collected, EPA would have no mechanism for tracking and assessing the extent to which assistance programs are operating effectively, efficiently, and equitably. This situation would leave EPA unable to fulfill its legal and administrative requirements to ensure responsible stewardship of public funds; rigorous evidence-based learning and improvement; and transparent accountability to the American public.

## **7. GENERAL GUIDELINES**

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

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Information collections will be conducted in accordance with the Paperwork Reduction Act [44 U.S.C. 3501 et seq and 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.

Both the Aggregate Davis Bacon and Related Acts Reporting form and the Workforce Training Outcomes form ask EPA grant recipients to report aggregate self-reported race and ethnicity data. EPA's proposed instruments will use Presentation Approach 3 as defined in OMB Statistical Policy Directive No. 15: *Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity* (SPD-15). This approach presents data using one of the seven minimum race and/or ethnicity categories and then combines all other respondents reporting multiple race and/or ethnicity categories into an aggregated *Multiracial and/or Multiethnic* category.

EPA acknowledges that this approach will potentially obscure the specific racial and ethnic diversity of the population (e.g., over half of the population who identify as American Indian or Alaska Native and Native Hawaiian or Pacific Islander may be assigned to the Multiracial and/or Multiethnic group). In EPA's view, however, requesting more detailed reporting to document this level of diversity would be unreasonably burdensome on grant recipients without providing significant value to EPA at the aggregate level. The minimum categories are sufficient for the planned use of the collected information. Therefore, asking for more detailed information places an unnecessary burden on the respondents. If and when appropriate, EPA project officers will encourage recipients to collect this more detailed data.

## **8. PUBLIC COMMENT AND CONSULTATIONS**

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### **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 (FRL: 11791-01-OCFO) announcing the Agency's intention to request an OMB review of this information collection activity. This notice was published on March 7, 2024, in Volume 89, Number 46, Pages 16558-16559, and provided a 60-day period for public comment (Docket ID EPA-HQ-OCFO-2024-0107). No comments were submitted as part of this process.

### **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.*

#### *General Performance Reporting Forms*

EPA has engaged states and Tribes during the process of developing the reporting framework and forms for this ICR. This included a discussion at the February meeting of the E-Enterprise Leadership Council; a Tribal consultation between March 4<sup>th</sup> to April 12<sup>th</sup> that included an informational webinar; and a discussion at a June 14<sup>th</sup> meeting with the Environmental Council of States.

EPA has also consulted with representatives from five organizations that received assistance awards from different Agency programs in the past 18 months. Discussions focused on the clarity of questions and instructions; user-friendliness of the forms' structure and formats; and various aspects of reporting burden (e.g., amount of time estimated to collate, organize, and report the requested information).

#### *Program-Specific Performance Reporting Forms*

Programs administering assistance agreements maintain regular contact with recipients via written correspondence, telephone calls, and (video and/or in-person) meetings. Throughout these interactions, recipients often provide informal feedback regarding performance reporting expectations and processes. Programs have also engaged in more formal consultations (with nine or fewer recipients) in order to determine the burden hours and costs associated with the completion of their forms.

#### *Labor and Workforce Metrics Forms*

In developing these reporting instruments, EPA engaged with other Federal Agencies, including the Department of Labor, and staff from the White House Policy Councils.

### **9. PAYMENTS OR GIFTS TO RESPONDENTS**

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

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Incentives are generally not appropriate for recipients of assistance agreements because they already have a preexisting relationship with the Agency. Incentives will not be provided for performance reports submitted by recipients of assistance awards.

## **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.*

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EPA asks recipients of assistance awards to refrain from including any confidential business information (CBI) in their reporting. All confidential data will be handled in accordance with 40 CFR 122.7, 40 CFR Part 2, and EPA's Information Security Policy dated March 7, 2023 ([Directive No. CIO 2150.6](#)). Any claim of confidentiality must be asserted at the time of submission. Any personal information included in a request would be treated in accordance with the Privacy Act, section 14 of TSCA, and the Freedom of Information Act.

EPA staff 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.

Data will be publicly reported in anonymous and aggregated form where necessary to protect Confidential Business Information (CBI) and Personally Identifiable Information (PII). Location identifiers will be used to fulfill federal reporting requirements (e.g., DATA Act) to document results in different geographic locations. EPA will follow best practices in stating the source of the data (e.g., interim performance reports) and the methodology used to collect the information (e.g., self-report).

## **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.*

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

## **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.*
- 

**Total Annual Number of Respondents (across all instruments) = 3,145 respondents**

**Total Annual Number of Responses (across all instruments) = 4,056 responses**

**Total Annual Hour Burden (across all instruments and respondents) = 84,048 hours**

**Total Annual Cost (across all instruments and respondents) = \$6,820,969.86**

### **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. Respondents for each set of forms are noted in Section 12d.

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

General information about the categories of collected information is described in Section 2 (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**

The grantees incur a burden in the process of preparing, completing, and submitting the information via work plans, interim performance reports, and final performance reports.

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

The burden for respondents was estimated using a seven-step process for each information collection instrument:

1. Calculate the number of hours to prepare, complete, and submit each response, across all staff roles at relevant levels of seniority: management, technical, clerical/support (based on consultations and input from programs).
2. Calculate the weighted labor cost to prepare, complete, and submit each response, across all staff roles involved (based on salaries identified in the Bureau of Labor Statistics) and a 110% loading to account for the additional costs of employee benefits and overhead costs.
3. Determine the number of responses for the three years (based on input from programs).
4. Calculate the total burden hours per instrument (number of hours per response multiplied by number of responses).
5. Calculate the total cost per instrument (labor cost per response multiplied by number of responses).
6. Calculate the total burden hours and costs across all instruments for the three years.
7. Calculate the annualized burden hours and costs across all instruments for each year.



**Table 12.1** (below) includes the information calculated in each step of the methodology for the general performance reporting forms, with the total burden hours and costs and annualized burden hours and costs presented in the bottom two rows. **Appendix 1** includes the calculations and reference sources for Steps 1 and 2 of the methodology. The number of responses was estimated based on discussions with programs who plan to use the forms.

<b>Table 12.1: Estimated burdens and costs associated with general performance reporting forms - Respondents (100% private)</b>					
Activity	1. Burden per Response (Hours) <sup>1</sup>	2. Weighted Loaded Labor Cost per Response (Dollars) <sup>2</sup>	3. Number of Responses (3 years) <sup>3</sup>	4. Total Burden Hours (3 years) <sup>4</sup>	5. Total Labor Cost (3 years) <sup>5</sup>
Performance Work Plan Form	40	\$2,121.04 (hourly = \$53.03)	300	12,000	\$636,312
Interim Performance Report Form	20	\$536.63 (hourly = \$53.03)	900	18,000	\$482,967
Final Performance Report Form	40	\$1,073.26 (hourly = \$53.03)	150	6,000	\$160,989
<b>6. TOTALS for all three years<sup>6</sup></b>				36,000 hours	\$1,280,268
<b>7. ANNUALIZED TOTALS per year<sup>7</sup></b>				<b>12,000 hours</b>	<b>\$426,756</b>

**Notes:**

- 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 Appendix 1**.
- 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 wage rates, please see **Tables 12.2 and 12.3 in Appendix 1**.
- Column 3** = Expected number of responses for the three years, based on discussions with programs who plan to use the forms.
- Column 4** = Total burden hours, calculated by multiplying the burden hours per response (Column 1) by the number of responses (Column 3).
- Column 5** = Total labor cost, calculated by multiplying the weighted labor cost per response (Column 2) by the number of responses (Column 3).
- Row 6 = Totals for all three years** = Sum of total hours and costs, for all instruments.
- Row 7 = Annualized totals per year** = Average number of hours and costs per year, for all instruments.

Program-Specific Performance Reporting Forms

**Tables 12.2 to 12.16** (below) include the information calculated in each step of the methodology for each set of program-specific forms, with the total burden hours and costs and annualized burden hours and costs presented in the bottom two rows. **Appendix 2** includes the calculations and reference sources for Steps 1 and 2 of the methodology. The number of responses was estimated by each program based on expected funding levels.

**Table 12.2: Indian Environmental General Assistance Program (GAP)**

<b>Estimated burdens and costs - Respondents (100% Government)</b>					
Activity	1. Burden per Response (Hours)	2. Weighted Loaded Labor Cost per Response (Dollars)	3. Number of Responses (3 years)	4. Total Burden Hours (3 years)	5. Total Labor Cost (3 years)
GAP National ETEP Work Plan	21	\$1,811.88 (hourly = \$86.28)	150	3,150	\$271,791.45
GAP Work Plan	2	\$172.57 (hourly = \$86.28)	750	1,500	\$129,424.50
GAP Budget Worksheet Work Plan	2	\$172.57 (hourly = \$86.28)	750	1,500	\$129,424.50
GAP Progress Report	3	\$258.85 (hourly = \$86.28)	750	2,250	\$194,136.75
<b>6. TOTALS for all three years</b>				8,400 hours	\$724,777.2
<b>7. ANNUALIZED TOTALS per year</b>				2,800 hours	\$241,592.40

**Table 12.3: State and Tribal Indoor Radon Grants**

<b>Estimated burdens and costs - Respondents (75% Government, 25% Private)</b>					
<b>Activity</b>	<b>1. Burden per Response (Hours)</b>	<b>2. Weighted Loaded Labor Cost per Response (Dollars)</b>	<b>3. Number of Responses (3 years)</b>	<b>4. Total Burden Hours (3 years)</b>	<b>5. Total Labor Cost (3 years)</b>
Annual National Reporting Template Progress Report	3	\$258.78 (hourly = \$86.28)	129	387	\$33,382.62
Biannual National Reporting Template Progress Report	3	\$258.78 (hourly = \$86.28)	144	432	\$37,264.32
Quarterly National Reporting Template Progress Report	3	\$258.78 (hourly = \$86.28)	24	72	\$6,210.72
<b>6. TOTALS for all three years</b>				891 hours	\$76,857.66
<b>7. ANNUALIZED TOTALS per year</b>				<b>297 hours</b>	<b>\$25,619.22</b>

**Table 12.4: Pollution Prevention (P2) Program**

<b>Estimated burdens and costs - Respondents (100% Government)</b>					
<b>Activity</b>	<b>1. Burden per Response (Hours)</b>	<b>2. Weighted Loaded Labor Cost per Response (Dollars)</b>	<b>3. Number of Responses (3 years)</b>	<b>4. Total Burden Hours (3 years)</b>	<b>5. Total Labor Cost (3 years)</b>
P2 EJ Template 1 Work Plan	20	\$1,688.98 (hourly = \$84.45)	357	7,140	\$602,973.00
P2 EJ Template 2 Work Plan	14	\$1,182.29 (hourly = \$84.45)	108	1,512	\$127,688.40
P2 EJ Communities Work Plan	20	\$1,688.98 (hourly = \$84.45)	180	3,600	\$304,020.00
P2 EJ Products Work Plan	20	\$1,688.98 (hourly = \$84.45)	180	3,600	\$304,020.00
<b>6. TOTALS for all three years</b>				15,852 hours	\$1,338,701.40
<b>7. ANNUALIZED TOTALS per year</b>				<b>5,284 hours</b>	<b>\$446,233.80</b>

**Table 12.5: Emerging Contaminants in Small or Disadvantaged Communities (EC-SDC) Grant Program**

<b>Estimated burdens and costs - Respondents (100% Government)</b>					
<b>Activity</b>	<b>1. Burden per Response (Hours)</b>	<b>2. Weighted Loaded Labor Cost per Response (Dollars)</b>	<b>3. Number of Responses (3 years)</b>	<b>4. Total Burden Hours (3 years)</b>	<b>5. Total Labor Cost (3 years)</b>
Water Infrastructure Investment Tracking System (WIITS) Progress Report	2	\$151.42 (hourly = 75.71)	167	334	\$25,287.14
Water Infrastructure Investment Tracking System (WIITS) Final Report	2	\$151.42 (hourly = \$75.71)	167	334	\$25,287.14
<b>6. TOTALS for all three years</b>				668 hours	\$50,574.28
<b>7. ANNUALIZED TOTALS per year</b>				<b>222.67 hours</b>	<b>\$16,858.09</b>

**Table 12.6: Environmental Finance Center (EFC) Grant Program**

<b>Estimated burdens and costs - Respondents (100% Private)</b>					
Activity	1. Burden per Response (Hours)	2. Weighted Loaded Labor Cost per Response (Dollars)	3. Number of Responses (3 years)	4. Total Burden Hours (3 years)	5. Total Labor Cost (3 years)
EFC Progress Report	8	\$690.24 (hourly = \$86.28)	87	696	\$60,050.88
<b>6. TOTALS for all three years</b>				696 hours	\$60,050.88
<b>7. ANNUALIZED TOTALS per year</b>				<b>232 hours</b>	<b>\$20,016.96</b>

**Table 12.7: Gulf Hypoxia Program**

<b>Estimated burdens and costs - Respondents (90% Government, 10% Private)</b>					
Activity	1. Burden per Response (Hours)	2. Weighted Loaded Labor Cost per Response (Dollars)	3. Number of Responses (3 years)	4. Total Burden Hours (3 years)	5. Total Labor Cost (3 years)
Grants Reporting and Tracking System (GRTS) Progress Report	10	\$829.41 (hourly = 82.94)	93	930	\$77,135.13
<b>6. TOTALS for all three years</b>				930 hours	\$77,135.13
<b>7. ANNUALIZED TOTALS per year</b>				<b>310 hours</b>	<b>\$25,711.71</b>

**Table 12.8: Gulf of Mexico Program**

<b>Estimated burdens and costs - Respondents (75% Government, 25% Private)</b>					
Activity	1. Burden per Response (Hours)	2. Weighted Loaded Labor Cost per Response (Dollars)	3. Number of Responses (3 years)	4. Total Burden Hours (3 years)	5. Total Labor Cost (3 years)
Gulf of Mexico Progress Report	1	\$86.28 (hourly = \$86.28)	1,200	1,200	\$103,536.00
<b>6. TOTALS for all three years</b>				1,200 hours	\$103,536.00
<b>7. ANNUALIZED TOTALS per year</b>				<b>400 hours</b>	<b>\$34,512.00</b>

**Table 12.9: Long Island Sound Program**

<b>Estimated burdens and costs - Respondents (67% Government, 33% Private)</b>					
Activity	1. Burden per Response (Hours)	2. Weighted Loaded Labor Cost per Response (Dollars)	3. Number of Responses (3 years)	4. Total Burden Hours (3 years)	5. Total Labor Cost (3 years)
LIS Progress Report	2.5	\$188.90 (hourly = \$75.56)	306	765	\$57,803.48
<b>6. TOTALS for all three years</b>				765 hours	\$57,803.48
<b>7. ANNUALIZED TOTALS per year</b>				<b>255 hours</b>	<b>\$19,267.83</b>

**Table 12.10: Reducing Lead in Drinking Water Grants**

<b>Estimated burdens and costs - Respondents (40% Government, 60% Private)</b>					
<b>Activity</b>	<b>1. Burden per Response (Hours)</b>	<b>2. Weighted Loaded Labor Cost per Response (Dollars)</b>	<b>3. Number of Responses (3 years)</b>	<b>4. Total Burden Hours (3 years)</b>	<b>5. Total Labor Cost (3 years)</b>
Priority Area 1 Annual Report Progress Report	1	\$56.03 (hourly = \$56.03)	36	36	\$2,017.08
Priority Area 1 Semi-Annual Report Progress Report	2	\$112.06 (hourly = \$56.03)	72	144	\$8,068.32
Priority Area 2 Annual Report Progress Report	1	\$56.03 (hourly = \$56.03)	60	60	\$3,361.80
Priority Area 2 Semi-Annual Report Progress Report	2	\$112.06 (hourly = \$56.03)	120	240	\$13,447.20
<b>6. TOTALS for all three years</b>				480 hours	\$26,894.40
<b>7. ANNUALIZED TOTALS per year</b>				<b>160 hours</b>	<b>\$8,964.80</b>



**Table 12.11: Rural, Small and Tribal Technical Assistance and Training Grant Program**

<b>Estimated burdens and costs - Respondents (100% Private)</b>					
Activity	1. Burden per Response (Hours)	2. Weighted Loaded Labor Cost per Response (Dollars)	3. Number of Responses (3 years)	4. Total Burden Hours (3 years)	5. Total Labor Cost (3 years)
Progress Report	1	\$83.66 (hourly = \$83.66)	261	261	\$21,835.26
<b>6. TOTALS for all three years</b>				261 hours	\$21,835.26
<b>7. ANNUALIZED TOTALS per year</b>				<b>87 hours</b>	<b>\$7,278.42</b>

**Table 12.12: Training and Technical Assistance to Improve Water Quality and Enable Small Public Water Systems to Provide Safe Drinking Water**

<b>Estimated burdens and costs - Respondents (100% Private)</b>					
Activity	1. Burden per Response (Hours)	2. Weighted Loaded Labor Cost per Response (Dollars)	3. Number of Responses (3 years)	4. Total Burden Hours (3 years)	5. Total Labor Cost (3 years)
Progress Report	18	\$1,657.62 (hourly = \$92.09)	128	2,304	\$212,175.36
<b>6. TOTALS for all three years</b>				2,304 hours	\$212,175.36
<b>7. ANNUALIZED TOTALS per year</b>				<b>768 hours</b>	<b>\$70,725.12</b>

**Table 12.13: School and Child Care Lead Testing and Reduction Grant Program**

<b>Estimated burdens and costs - Respondents (100% Government)</b>					
<b>Activity</b>	<b>1. Burden per Response (Hours)</b>	<b>2. Weighted Loaded Labor Cost per Response (Dollars)</b>	<b>3. Number of Responses (3 years)</b>	<b>4. Total Burden Hours (3 years)</b>	<b>5. Total Labor Cost (3 years)</b>
Progress Report	2	\$157.48 (hourly = \$78.74)	795	1,590	\$125,196.60
<b>6. TOTALS for all three years</b>				1,590 hours	\$125,196.60
<b>7. ANNUALIZED TOTALS per year</b>				<b>530 hours</b>	<b>\$41,732.20</b>

**Table 12.14: Section 319 Nonpoint Source Program**

<b>Estimated burdens and costs - Respondents (100% Government)</b>					
<b>Activity</b>	<b>1. Burden per Response (Hours)</b>	<b>2. Weighted Loaded Labor Cost per Response (Dollars)</b>	<b>3. Number of Responses (3 years)</b>	<b>4. Total Burden Hours (3 years)</b>	<b>5. Total Labor Cost (3 years)</b>
Grants Reporting and Tracking System (GRTS) Database Progress Report	13.5	\$1,022.08 (hourly = \$75.71)	258	3,483	\$263,696.64
Grants Reporting and Tracking System (GRTS) Database Final Report	12	\$908.52 (hourly = \$75.71)	258	3,096	\$234,398.16
Grants Reporting and Tracking System (GRTS) Database Success Story	10	\$757.10 (hourly = \$75.71)	55	550	\$41,640.5
<b>6. TOTALS for all three years</b>				7,129 hours	\$539,735.30
<b>7. ANNUALIZED TOTALS per year</b>				<b>2,376.33 hours</b>	<b>\$179,911.77</b>

**Table 12.15: Tribal Drinking Water Grant Program**

<b>Estimated burdens and costs - Respondents (100% Government)</b>					
Activity	1. Burden per Response (Hours)	2. Weighted Loaded Labor Cost per Response (Dollars)	3. Number of Responses (3 years)	4. Total Burden Hours (3 years)	5. Total Labor Cost (3 years)
Work Plan	3.5	\$301.98 (hourly = \$86.28)	360	1,260	\$108,712.80
<b>6. TOTALS for all three years</b>				1,260 hours	\$108,712.80
<b>7. ANNUALIZED TOTALS per year</b>				<b>420 hours</b>	<b>\$36,237.60</b>

**Table 12.16: Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Grants**

<b>Table 12.16: Estimated burdens and costs - Respondents (100% Government)</b>					
Activity	1. Burden per Response (Hours)	2. Weighted Loaded Labor Cost per Response (Dollars)	3. Number of Responses (3 years)	4. Total Burden Hours (3 years)	5. Total Labor Cost (3 years)
Work Plan + Progress Report	323	\$29,324.85 (hourly = \$90.79)	486	156,978	\$14,251,875.64
<b>6. TOTALS for all three years</b>				156,978 hours	\$14,251,875.64
<b>7. ANNUALIZED TOTALS per year</b>				<b>52,326 hours</b>	<b>\$4,750,625.00</b>

Labor and Workforce Metrics Forms

**Table 12.17** (below) includes the information calculated in each step of the methodology for the labor and workforce metrics forms, with the total burden hours and costs and annualized burden hours and costs presented in the bottom two rows. **Appendix 3** includes the calculations and reference sources for Steps 1 and 2 of the methodology. The number of responses was estimated based on discussions with programs who plan to use the forms.

<b>Table 12.17: Estimated burdens and costs associated with Labor and Workforce Metrics Forms - Respondents</b>					
Activity	1. Burden per Response (Hours)	2. Weighted Loaded Labor Cost per Response (Dollars)	3. Number of Responses (3 years)	4. Total Burden Hours (3 years)	5. Total Labor Cost (3 years)
Aggregate Davis Bacon and Related Acts Reporting	5	Government: \$431.40 (hourly = \$86.28)	Government: 246	Government: 1,230	Government: \$106,128.09
		Private: \$418.30 (hourly = \$83.66)	Private: 1,182	Private: 5,910	Private: \$494,430.60
"Good Jobs" Metrics	10	Government: \$862.80 (hourly = \$86.28)	Government: 0	Government: 0	Government: \$0
		Private: \$836.60 (hourly = \$83.66)	Private: 510	Private: 5,100	Private: \$426,666.00
Workforce Training Outcomes	10	Government: \$862.80 (hourly = \$86.28)	Government: 118.8	Government: 1,188	Government: \$102,504.20
		Private: \$836.60 (hourly = \$83.66)	Private: 331.2	Private: 3,312	Private: \$277,081.92
<b>6. TOTALS for all three years</b>				16,740 hours	\$1,406,810.81
<b>7. ANNUALIZED TOTALS per year</b>				5,580 hours	\$468,936.94

### **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.*

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#### **Capital and Start-Up Costs**

There are no specified capital or start-up costs for grantees to meet the EPA's performance reporting requirements, as each grantee 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 for the work plans, interim performance reports, and final performance reports. EPA does not anticipate that any specialist equipment or infrastructure will be needed to complete the performance reports.

#### **Operation and Maintenance and Purchase of Services**

Grantees are not expected to incur any specified operation or maintenance costs in order to meet EPA's performance reporting requirements. This is because they can use the standard equipment and infrastructure that they use for other aspects of their work in the organization; thus, the costs associated with operation and maintenance should already be included as standard items in their annual budgets.

### **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.*

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## 14a. Agency Activities

EPA incurs a burden in the process of reviewing and processing the information collected via performance reporting instruments from grantees: work plans, interim performance reports, and final performance reports.

## 14b. Agency Labor Cost

**Total Annual Hour Burden to the Agency (across all instruments) = 90,768.50 hours**

**Total Annual Cost to the Agency (across all instruments) = \$7,031,821.97**

### *Methodology*

The burden imposed upon EPA was estimated using a seven-step process for each instrument:

1. Calculate the number of hours to review and process each response, across all staff roles at relevant levels of seniority: management, technical, clerical/support (based on consultations with EPA staff).
2. Calculated the loaded weighted labor cost to review and process each response, across all staff levels involved (based on salaries for relevant GS levels and a 60% loading to account for the additional costs of employee benefits incurred by the Agency as part of its overall labor costs).
3. Determine the number of responses for the three years.
4. Calculate the total burden hours per instrument (number of hours per response multiplied by the number of responses).
5. Calculate the total cost per instrument (labor cost per response multiplied by the number of responses).
6. Calculate the total burden hours and costs across all instruments for the three years.
7. Calculate the annualized burden hours and costs across all instruments for each year.

### *General Performance Reporting Forms*

**Table 14.1** (below) includes the information calculated in each step of the methodology for the general performance reporting forms, with the total burden hours and costs and annualized burden hours and costs presented in the bottom two rows. **Appendix 4** includes the calculations and reference sources for Steps 1 and 2 of the methodology. The number of responses was estimated based on discussions with programs who plan to use the forms.

**Table 14.1: Estimated burdens and costs associated with general performance reporting**

<b>forms - EPA Staff</b>					
Instrument (Review + Process)	1. Burden per Response (Hours) <sup>1</sup>	2. Weighted Loaded Labor Cost per Response (Dollars) <sup>2</sup>	3. Number of Responses (3 years) <sup>3</sup>	4. Total Burden Hours (3 years) <sup>4</sup>	5. Total Labor Cost (3 years) <sup>5</sup>
Work plan	15	\$1,175.42 (hourly = \$78.36)	300	4,500	\$352,626
Interim Performance Report	5	\$391.81 (hourly = \$78.36)	900	4,500	\$352,629
Final Performance Report	15	\$1,175.42 (hourly = \$78.36)	150	2,250	\$176,313
<b>6. TOTALS for all three years<sup>6</sup></b>				<b>11,250 hours</b>	<b>\$881,568</b>
<b>7. ANNUALIZED TOTALS per year<sup>7</sup></b>				<b>8,333 hours</b>	<b>\$653,013</b>

Notes:

- Column 1** = Number of burden hours spent on each response across all staff roles at relevant levels of seniority. For full calculations, see **Table 14.1 in Appendix 2**.
- Column 2** = Weighted loaded labor cost for each response based upon percentage of staff labor at different levels of seniority. For full calculations and reference sources for wage rates, see **Tables 14.2 and 14.3 in Appendix 2**.
- Column 3** = Expected number of responses for the three years, based on based on discussions with programs who plan to use the forms.
- Column 4** = Total burden hours, calculated by multiplying the burden hours per response (Column 1) by the number of responses (Column 3).
- Column 5** = Total labor cost, calculated by multiplying the loaded weighted labor cost per response (Column 2) by the number of responses (Column 3).
- Row 6 = Totals for all three years** = Sum of total hours and costs, for all instruments.
- Row 7 = Annualized totals per year** = Average number of hours and costs per year, for all instruments.



Program-Specific Performance Reporting Forms

**Tables 14.2 to 14.16** (below) include the information calculated in each step of the methodology for each set of program-specific forms, with the total burden hours and costs and annualized burden hours and costs presented in the bottom two rows. **Appendix 5** includes the calculations and reference sources for Steps 1 and 2 of the methodology. The number of responses was estimated by each program based on expected funding levels.

**Table 14.2: Indian Environmental General Assistance Program (GAP)**

<b>Estimated burdens and costs - EPA Staff</b>					
<b>Instrument (Review + Process)</b>	<b>1. Burden per Response (Hours)</b>	<b>2. Weighted Loaded Labor Cost per Response (Dollars)</b>	<b>3. Number of Responses (3 years)</b>	<b>4. Total Burden Hours (3 years)</b>	<b>5. Total Labor Cost (3 years)</b>
Indian Environmental General Assistance Program (GAP) National ETEP Template Work Plan	5	\$387.10 (hourly = \$77.42)	150	750	\$58,065.00
Indian Environmental General Assistance Program (GAP) Work Plan	3	\$232.26 (hourly = \$77.42)	750	2250	\$174,195.00
Indian Environmental General Assistance Program (GAP) Budget Sheet Work Plan	1	\$77.42 (hourly = \$77.42)	750	750	\$58,065.00
Indian Environmental General Assistance Program (GAP) Progress Report	2	\$154.84 (hourly = \$77.42)	750	1500	\$116,130.00
<b>6. TOTALS for all three years</b>				<b>3,750 hours</b>	<b>\$290,325.00</b>
<b>7. ANNUALIZED TOTALS per year</b>				<b>1,250 hours</b>	<b>\$96,775.00</b>

**Table 14.3: State and Tribal Indoor Radon Grants**

<b>Estimated burdens and costs - EPA Staff</b>					
<b>Instrument (Review + Process)</b>	<b>1. Burden per Response (Hours)</b>	<b>2. Weighted Loaded Labor Cost per Response (Dollars)</b>	<b>3. Number of Responses (3 years)</b>	<b>4. Total Burden Hours (3 years)</b>	<b>5. Total Labor Cost (3 years)</b>
State and Tribal Indoor Radon Grants Annual Progress Report	1	\$77.42 (hourly = \$77.42)	129	129	\$9,987.18
State and Tribal Indoor Radon Grants Biannual Progress Report	1	\$77.42 (hourly = \$77.42)	144	144	\$11,148.48
State and Tribal Indoor Radon Grants Quarterly Progress Report	1	\$77.42 (hourly = \$77.42)	24	24	\$1,858.08
<b>6. TOTALS for all three years</b>				<b>297 hours</b>	<b>\$22,993.74</b>
<b>7. ANNUALIZED TOTALS per year</b>				<b>99 hours</b>	<b>\$7,664.58</b>

**Table 14.4: Pollution Prevention (P2) Program**

<b>Estimated burdens and costs - EPA Staff</b>					
<b>Instrument (Review + Process)</b>	<b>1. Burden per Response (Hours)</b>	<b>2. Weighted Loaded Labor Cost per Response (Dollars)</b>	<b>3. Number of Responses (3 years)</b>	<b>4. Total Burden Hours (3 years)</b>	<b>5. Total Labor Cost (3 years)</b>
P2 EJ Template 1 EPA Form 9600-048 Work Plan	1	\$77.42 (hourly = \$77.42)	357	357	\$27,638.94
P2 EJ Template 2 EPA Form 9600-048 Work Plan	1	\$77.42 (hourly = \$77.42)	108	108	\$8,361.36
P2 EJ Communities EPA Form 9600-048 Work Plan	1	\$77.42 (hourly = \$77.42)	180	180	\$13,935.60
P2 EJ Products EPA Form 9600-048 Work Plan	1	\$77.42 (hourly = \$77.42)	180	180	\$13,935.60
<b>6. TOTALS for all three years</b>				<b>825 hours</b>	<b>\$63,871.50</b>
<b>7. ANNUALIZED TOTALS per year</b>				<b>275 hours</b>	<b>\$21,290.50</b>

**Table 14.5: Emerging Contaminants in Small or Disadvantaged Communities (EC-SDC) Grant**

<b>Estimated burdens and costs - EPA Staff</b>					
Instrument (Review + Process)	1. Burden per Response (Hours)	2. Weighted Loaded Labor Cost per Response (Dollars)	3. Number of Responses (3 years)	4. Total Burden Hours (3 years)	5. Total Labor Cost (3 years)
BIL EC-SDC Progress Report	1	\$77.42 (hourly = \$77.42)	167	167	\$12,929.14
BIL EC-SDC Final Report	1	\$77.42 (hourly = \$77.42)	167	167	\$12,929.14
<b>6. TOTALS for all three years</b>				<b>334 hours</b>	<b>\$25,858.28</b>
<b>7. ANNUALIZED TOTALS per year</b>				<b>111.33 hours</b>	<b>\$8,619.43</b>

**Table 14.6: Environmental Finance Center (EFC) Grant Program**

<b>Estimated burdens and costs - EPA Staff</b>					
Instrument (Review + Process)	1. Burden per Response (Hours)	2. Weighted Loaded Labor Cost per Response (Dollars)	3. Number of Responses (3 years)	4. Total Burden Hours (3 years)	5. Total Labor Cost (3 years)
Environmental Finance Center (EFC) Grants Program Progress Report	2.5	\$193.55 (hourly = \$77.42)	87	217.5	\$16,838.85
<b>6. TOTALS for all three years</b>				<b>217.5 hours</b>	<b>\$16,838.85</b>
<b>7. ANNUALIZED TOTALS per year</b>				<b>72.5 hours</b>	<b>\$5,612.95</b>

**Table 14.7: Gulf Hypoxia Program**

<b>Estimated burdens and costs - EPA Staff</b>					
Instrument (Review + Process)	1. Burden per Response (Hours)	2. Weighted Loaded Labor Cost per Response (Dollars)	3. Number of Responses (3 years)	4. Total Burden Hours (3 years)	5. Total Labor Cost (3 years)
IIJA/BIL Gulf Hypoxia Program Grants Reporting and Tracking System (GRTS) Progress Report	2	\$215.62 (hourly = \$107.81)	93	186	\$20,052.66
<b>6. TOTALS for all three years</b>				<b>186 hours</b>	<b>\$20,052.66</b>
<b>7. ANNUALIZED TOTALS per year</b>				<b>62 hours</b>	<b>\$6,684.22</b>

**Table 14.8: Gulf of Mexico Program**

<b>Estimated burdens and costs - EPA Staff</b>					
Instrument (Review + Process)	1. Burden per Response (Hours)	2. Weighted Loaded Labor Cost per Response (Dollars)	3. Number of Responses (3 years)	4. Total Burden Hours (3 years)	5. Total Labor Cost (3 years)
Gulf of Mexico Progress Report	1	\$77.42 (hourly = \$77.42)	1200	1200	\$92,904.00
<b>6. TOTALS for all three years</b>				<b>1,200 hours</b>	<b>\$92,904.00</b>
<b>7. ANNUALIZED TOTALS per year</b>				<b>400 hours</b>	<b>\$30,968.00</b>

**Table 14.9: Long Island Sound Program**

<b>Estimated burdens and costs - EPA Staff</b>					
Instrument (Review + Process)	1. Burden per Response (Hours)	2. Weighted Loaded Labor Cost per Response (Dollars)	3. Number of Responses (3 years)	4. Total Burden Hours (3 years)	5. Total Labor Cost (3 years)
Long Island Sound Progress Report	2.5	\$193.55 (hourly = \$77.42)	306	765	\$59,226.30
<b>6. TOTALS for all three years</b>				<b>765 hours</b>	<b>\$59,226.30</b>
<b>7. ANNUALIZED TOTALS per year</b>				<b>255 hours</b>	<b>\$19,742.10</b>

**Table 14.10: Reducing Lead in Drinking Water Grants**

<b>Estimated burdens and costs - EPA Staff</b>					
Instrument (Review + Process)	1. Burden per Response (Hours)	2. Weighted Loaded Labor Cost per Response (Dollars)	3. Number of Responses (3 years)	4. Total Burden Hours (3 years)	5. Total Labor Cost (3 years)
Priority Area 1 Annual Report	1	\$89.87 (hourly = \$89.87)	36	36	\$3,235.32
Priority Area 1 Semi-Annual Report	1	\$89.87 (hourly = \$89.87)	72	72	\$6,470.64
Priority Area 2 Annual Report	1	\$89.87 (hourly = \$89.87)	60	60	\$5,392.20
Priority Area 2 Semi-Annual Report	1	\$89.87 (hourly = \$89.87)	120	120	\$10,784.40
<b>6. TOTALS for all three years</b>				<b>228 hours</b>	<b>\$25,881.98</b>
<b>7. ANNUALIZED TOTALS per year</b>				<b>96 hours</b>	<b>\$8,627.33</b>

**Table 14.11: Rural, Small and Tribal Technical Assistance and Training Grant Program**

<b>Estimated burdens and costs - EPA Staff</b>					
Instrument (Review + Process)	1. Burden per Response (Hours)	2. Weighted Loaded Labor Cost per Response (Dollars)	3. Number of Responses (3 years)	4. Total Burden Hours (3 years)	5. Total Labor Cost (3 years)
Progress Report	3	\$232.26 (hourly = \$77.42)	261	783	\$60,619.86
<b>6. TOTALS for all three years</b>				<b>783 hours</b>	<b>\$60,619.86</b>
<b>7. ANNUALIZED TOTALS per year</b>				<b>261 hours</b>	<b>\$20,206.62</b>

**Table 14.12: Training and Technical Assistance to Improve Water Quality and Enable Small Public Water Systems to Provide Safe Drinking Water**

<b>Estimated burdens and costs - EPA Staff</b>					
Instrument (Review + Process)	1. Burden per Response (Hours)	2. Weighted Loaded Labor Cost per Response (Dollars)	3. Number of Responses (3 years)	4. Total Burden Hours (3 years)	5. Total Labor Cost (3 years)
Progress Report	3.5	\$222.11 (hourly = \$63.46)	128	448	\$28,430.08
<b>6. TOTALS for all three years</b>				<b>448 hours</b>	<b>\$28,430.08</b>
<b>7. ANNUALIZED TOTALS per year</b>				<b>149.33 hours</b>	<b>\$9,476.69</b>

**Table 14.13: School and Child Care Lead Testing and Reduction Grant Program**

<b>Estimated burdens and costs - EPA Staff</b>					
Instrument (Review + Process)	1. Burden per Response (Hours)	2. Weighted Loaded Labor Cost per Response (Dollars)	3. Number of Responses (3 years)	4. Total Burden Hours (3 years)	5. Total Labor Cost (3 years)
Progress Report	2	\$154.84 (hourly = \$77.42)	795	1590	\$123,097.80
<b>6. TOTALS for all three years</b>				<b>1,590 hours</b>	<b>\$123,097.80</b>
<b>7. ANNUALIZED TOTALS per year</b>				<b>530 hours</b>	<b>\$41,032.60</b>

**Table 14.14: Section 319 Nonpoint Source Program**

<b>Estimated burdens and costs - EPA Staff</b>					
Instrument (Review + Process)	1. Burden per Response (Hours)	2. Weighted Loaded Labor Cost per Response (Dollars)	3. Number of Responses (3 years)	4. Total Burden Hours (3 years)	5. Total Labor Cost (3 years)
Section 319 Nonpoint Source Program Database Progress Report	3	\$232.26 (hourly = \$77.42)	258	774	\$59,923.08
Section 319 Nonpoint Source program Database Final Report	3	\$232.26 (hourly = \$77.42)	258	774	\$59,923.08
Section 319 Nonpoint Source Program Success Story Progress Report	4	\$309.68 (hourly = \$77.42)	55	220	\$17,032.40
<b>6. TOTALS for all three years</b>				<b>1,768 hours</b>	<b>\$136,878.56</b>
<b>7. ANNUALIZED TOTALS per year</b>				<b>589.33 hours</b>	<b>\$45,626.19</b>

**Table 14.15: Tribal Drinking Water Grant Program**



<b>Estimated burdens and costs - EPA Staff</b>					
Instrument (Review + Process)	1. Burden per Response (Hours)	2. Weighted Loaded Labor Cost per Response (Dollars)	3. Number of Responses (3 years)	4. Total Burden Hours (3 years)	5. Total Labor Cost (3 years)
Tribal Drinking Water Grants Program Work Plan	2	\$154.84 (hourly = \$77.42)	360	720	\$55,742.40
<b>6. TOTALS for all three years</b>				<b>720 hours</b>	<b>\$55,742.40</b>
<b>7. ANNUALIZED TOTALS per year</b>				<b>240 hours</b>	<b>\$18,580.80</b>

**Table 14.16: Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Grants**

<b>Estimated burdens and costs - EPA Staff</b>					
Instrument (Review + Process)	1. Burden per Response (Hours)	2. Weighted Loaded Labor Cost per Response (Dollars)	3. Number of Responses (3 years)	4. Total Burden Hours (3 years)	5. Total Labor Cost (3 years)
FIFRA Work Plan + Progress Report	498	\$38,555.16 (hourly = \$77.42)	486	242,028	\$18,737,807.80
<b>6. TOTALS for all three years</b>				<b>242,028 hours</b>	<b>\$18,737,807.80</b>
<b>7. ANNUALIZED TOTALS per year</b>				<b>80,676 hours</b>	<b>\$6,245,935.92</b>

Labor and Workforce Metrics Forms

**Table 14.17** (below) includes the information calculated in each step of the methodology for the labor and workforce metrics forms, with the total burden hours and costs and annualized burden hours and costs presented in the bottom two rows. **Appendix 6** includes the calculations and reference sources for Steps 1 and 2 of the methodology. The number of responses was estimated based on discussions with programs who plan to use the forms.

<b>Table 14.17: Estimated burdens and costs associated with general forms - EPA Staff</b>					
Instrument (Review + Process)	1. Burden per Response (Hours)	2. Weighted Loaded Labor Cost per Response (Dollars)	3. Number of Responses (3 years)	4. Total Burden Hours (3 years)	5. Total Labor Cost (3 years)
Aggregate Davis Bacon and Related Acts Reporting	1	\$77.42 (hourly = \$77.42)	1,476	1,476	\$114,271.92
"Good Jobs" Metrics	3	\$232.26 (hourly = \$77.42)	510	1530	\$118,452.60
Workforce Training Outcomes	3	\$232.26 (hourly = \$77.42)	450	1350	\$104,517.00
<b>6. TOTALS for all three years</b>				<b>4,356 hours</b>	<b>\$337,241.52</b>
<b>7. ANNUALIZED TOTALS per year</b>				<b>1,452 hours</b>	<b>\$112,413.84</b>

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

There are no expected operational costs unique to this information collection, as EPA staff are reviewing the collected information as part of their work in supporting the grantees.

#### **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.*

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Not applicable: This is a new collection.

#### **15. 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.*

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#### **Collection and Tabulation of Information**

Due to the range of assistance programs covered by this general ICR, it is not possible to provide definitive plans and schedules for the collection and tabulation of information. EPA expects work to progress continuously throughout the duration of the clearance.

#### **Use and Publication of Information**

This ICR seeks authorization for the collection of information to support performance measurement. The administrative data collected under this ICR may be used as part of other analytical studies as appropriate.

Information collected under this ICR will be used to support Program and Agency activities in two ways.

- 1. Internal Decision-Making: Continuous Improvement and Evidence Building*

EPA can use the collected information about project outputs and outcomes to track progress against program objectives, thus allowing for assessments of effectiveness, efficiency, and equity. Results will help EPA identify success stories as well as areas for improvement, which will inform internal discussions to develop evidence-based recommendations for best practices and improvement strategies within the program. In line with the [2018 Evidence Act](#), this evidence will be used to inform and improve day-to-day operations and decision-making. The Agency's Office of the Chief Financial Officer provides resources and support to develop staff capacity to use information and data in this way.

2. *Public Reporting: Accountability*

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

- a) EPA will post aggregated summaries of the project performance (e.g., activities, outputs, outcomes) on its public websites.
- b) EPA will collate program-level information for inclusion in public reports, such as the Annual Performance Report mandated by the Government Performance and Results Modernization Act and annual reports on activities supported by supplemental funds (e.g., Bipartisan Infrastructure Law, Inflation Reduction Act).
- c) EPA will use the collected information to respond to requests for data and information.

Information will be reported in anonymous and aggregated form where necessary to protect Confidential Business Information (CBI) and Personally Identifiable Information (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 and the methodology used to collect the information.

**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.*

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Not applicable: All instruments will display the expiration date for OMB approval of the information collection.

**18. CERTIFICATION STATEMENT**

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

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