# ATTACHMENT N

Detailed Burden and Cost Calculations

**Wage Rates**

**Respondents**

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **ICR Category** | **BLS Category a** | **Overall Hourly** | **Wage** | **Fringe Benefit** | **Total Compensation** | **Overhead % of Total Compensation b** | **Overhead** | **Hourly Loaded Wages** | **Rounded** |
| General civilian | All workers (average civilian worker) | $45.42 | $31.29 | $14.13 | $45.42 | 20% | $9.08 | $54.50 | $55 |
| Management | Management, business and financial | $77.56 | $53.10 | $24.46 | $77.56 | 20% | $15.51 | $93.07 | $93 |
| Technical | Professional and related | $68.47 | $45.60 | $22.86 | $68.46 | 20% | $13.69 | $82.15 | $82 |
| Clerical | Office and administrative support | $34.40 | $23.80 | $10.60 | $34.40 | 20% | $6.88 | $41.28 | $41 |

a Source: Bureau of Labor Statistics, 2024 (<https://www.bls.gov/news.release/pdf/ecec.pdf>)

b An overhead rate of 20% is used based on assumptions in *Handbook on Valuing Changes in Time Use Induced by Regulatory Requirements and Other U.S. EPA Actions* (EPA 2020).

**Agency**

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| --- | --- | --- | --- | --- | --- |
| **ICR Category** | **OPM Category** | **Overall Hourly** | **Loading Factor a** | **Loaded Wages** | **Rounded** |
| Management | GS-13 Step 5 | $64.06 | 1.639 | $104.99 | $105 |
| Technical | GS-10 Step 10 | $46.92 | 1.639 | $76.90 | $77 |
| Clerical | GS-5 Step 1 | $21.63 | 1.639 | $35.45 | $35 |

Source: Office of Personnel Management, 2024 (<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/html/DCB_h.aspx>)

a Source: Falk, J. 2012. “Comparing Benefits and Total Compensation in the Federal Government and the Private Sector.” Congressional Budget Office Working Paper Series. (<https://www.cbo.gov/sites/default/files/112th-congress-2011-2012/workingpaper/2012-04fedbenefitswp0.pdf>)

**IC #1: Safer Choice product recognition program applications**

**Respondents**

|  |  |  |
| --- | --- | --- |
| **Collection Activity** | **Hours and Costs Per Respondent** | **Total Hours and Costs** |
| **Mgr.** | **Tech.** | **Cler.** | **Response Hours/Yr** | **Labor Cost/Year** | **Capital****Cost** | **O & M Cost\*** | **Number of Respon.\*\*** | **Total Hours/Yr** | **Total Cost/Yr** |
| **Partnership Agreements** |
| Review program information  | 1 | 1 | 0 | 2 | $175.00 | $0  | $0  | 44 | 88 | $7,700  |
| Fill out and submit third-party information request form | 0 | 5 | 1 | 6 | $451.00 | $0  | $0  | 44 | 264 | $19,844  |
| Establish agreement with third-party profiler | 1 | 1 | 1 | 3 | $216.00 | $0  | $12,400  | 44 | 132 | $555,104  |
| Submit summary report to Safer Choice | 1 | 1 | 0 | 2 | $175.00 | $0  | $0  | 44 | 88 | $7,700  |
| Establish Partnership Agreement w/ Safer Choice | 1 | 2 | 0 | 3 | $257.00 | $0  | $0  | 44 | 132 | $11,308  |
| *Subtotal* | *4* | *10* | *2* | *16* | *$1,274* | *$0*  | *$12,400*  | 44 | *704* | *$601,656*  |
| **Renewals and Audits** |
| Renew partnership, with no changes needed | 0 | 3 | 1 | 4 | $287.00 | $0  | $0  | 36 | 144 | $10,332  |
| Desk audit | 0 | 2 | 2 | 4 | $246.00 | $0  | $0  | 24 | 96 | $5,904  |
| Site audit | 0 | 2 | 1 | 3 | $205.00 | $0  | $0  | 12 | 36 | $2,460  |
| *Subtotal* | *0* | *7* | *4* | *11* | *$738*  | *$0*  | *$0*  | *36* | *276* | *$18,696*  |
| **Adding Private Label Partners and Products** |
| Review program information | 1 | 1 | 0 | 2 | $175.00 | $0  | $0  | 77 | 154 | $13,475  |
| Fill out and submit online Private Label submission | 0 | 4.5 | 1.5 | 6 | $430.50 | $0  | $0  | 77 | 462 | $33,149  |
| *Subtotal* | *1* | *5.5* | *1.5* | *8* | *$606*  | *$0*  | *$0*  | *77* | *616* | $46,624  |
| **TOTAL** |  |  |  |  |  |  |  | ***157*** | ***1,596*** | ***$666,976***  |

\* The cost for third-party profiler review and verification assumes that the typical application submitted by a cleaning product manufacturer will contain four products, each with 2 ingredients ($650 each), 1 proprietary ingredient ($1,300), and a $500 administrative fee. The total cost per product is $3,100. The total will be $12,400 per company per application.

\*\*This column reports the number of annual respondents after accounting for the partnership renewal process. Assumes that one in ten formulators over the three-year period will need to make changes to their formulations and go through a new partnership process which includes same collection steps. On an annual basis, this translates to 4 product formulators (for a total of 44 partnership agreements). Also assumes that about 33% of the remaining product formulators will be subject to site audits each year (i.e., 12) and that about 66% (i.e., 24) will be subject to desk audits each year. Assumes that 77 partners will fill out Private Label submissions based on historical data.

**Agency**

|  |  |  |
| --- | --- | --- |
| **Collection Activity** | **Hours and Costs Per Respondent** | **Total Hours and Costs** |
| **Mgr. Hours/Yr** | **Tech. Hours/Yr** | **Agency Hours/Yr** | **Labor Cost/Year** | **Capital / Startup Cost** | **O & M Cost** | **Number of Respon.\*** | **Total Hours/Yr** | **Total Cost/Yr** |
|
| **Cleaning and Non-Cleaning Products** |
| Review program application forms | 0 | 1 | 1 | $77  | $0  | $0  | 44 | 44 | $3,388  |
| Review third-party profiler summary | 0 | 5 | 5 | $385  | $0  | $0  | 44 | 220 | $16,940  |
| Establish Partnership Agreement with formulator | 1 | 2 | 3 | $259  | $0  | $0  | 44 | 132 | $11,396  |
| Review partnership renewal, with no changes needed | 1 | 1 | 2 | $182  | $0  | $0  | 36 | 72 | $6,552  |
| Review audit summaries | 0 | 1 | 1 | $77  | $0  | $0  | 36 | 36 | $2,772  |
| *Subtotal* | *2* | *10* | *12* | *$980*  | *$0*  | *$0*  | *80* | *504* | *$41,048*  |
| **Adding Private Label Partners and Products** |
| Review Private Label submissions | 0 | 2 | 2 | $154  | $0  | $0  | 77 | 154 | $11,858  |
| *Subtotal* | *0* | *2* | *2* | *$154*  | *$0*  | *$0*  | *77* | *154* | *$11,858*  |
| **TOTAL** |  | ***157*** | ***658*** | ***$52,906***  |

\*This column reports the number of respondents after accounting for the partnership renewal process. Assumes that one in ten formulators will need to make changes to their formulations and go through a new partnership process which includes same collection steps, i.e. 4, for a total of 44 annually. Assumes that 77 partners will fill out Private Label submissions based on historical data.

**IC #2: Safer Choice label consultations**

**Respondents**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Collection Activity** | **Number of Respondents** | **Frequency of Response** | **Hours Per Response** | **Total Burden Hours** | **Total Cost** |
| Screening for Consumer Focus Groups | 300 | 1 | 0.17 | 51 | $2,805  |
| Consumer Focus Group Interviews | 30 | 1 | 2 | 60 | $3,300  |
| Consumer Online Survey | 4,000 | 1 | 0.5 | 2,000 | $110,000  |
| **TOTAL** | ***4,330*** | ***--*** | ***--*** | ***2,111*** | ***$116,105*** |

Note: No capital or operating and maintenance costs are incurred by respondents under this component of the ICR.

**Agency**

|  |  |  |
| --- | --- | --- |
| **Collection Activity** | **EPA Burden Hours** | **EPA Costs** |
| **Mgr. Hours** | **Tech. Hours** | **Total EPA Hours** | **Contractor Cost\*** | **EPA Cost** |
| ***Consumer Focus Groups*** |
| Prepare focus group materials | 0.5 | 2 | 2.5 | $47,500 for ten focus groups  | $207  |
| Prepare screener questionnaires | 0.5 | 2 | 2.5 | $207  |
| Organize and conduct focus groups | 0 | 0 | 0 | $0  |
| Review focus group results | 5 | 20 | 25 | $2,065  |
| *Subtotal* | *6* | *24* | *30* | *$47,500*  | *$2,478*  |
| ***Consumer Online Surveys*** |
| Prepare consumer online surveys | 1 | 4 | 5 | $48,918 for four consumer online surveys | $413  |
| Review consumer online survey results | 2 | 8 | 10 | $826  |
| *Subtotal* | *3* | *12* | *15* | *$48,918*  | *$1,239*  |
| **TOTAL** | ***9*** | ***36*** | ***45*** | ***$96,418***  | ***$3,717***  |

Note: Due to the contractor costs, these figures represent the total agency burden across the three-year period of the ICR.

Note: No capital or operating and maintenance costs are incurred by the Agency under this component of the ICR.

\* Contractor cost for consumer focus groups includes facility rental, recruiting, honorariums, transcription, and reimbursement to focus group participants for their travel and time (assumed $100 per participant). Contractor cost for consumer online surveys includes questionnaire development, programming, online fielding and results reporting.

**IC #3: Safer Choice Partner of the Year Awards program**

**Respondents**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Collection Activity** | **Estimated # of Applicants** | **Estimated Response Time (Hours)** | **Total Burden (Hours)** | **Total Cost** |
| **Mgr.** | **Tech.** | **Cler.** | **Mgr.** | **Tech.** | **Cler.** | **Total** |
| **Formulators/Product Manufacturers** |
| Review application and program information |  | 0 | 1 | 0 | 0 | 19 | 0 | 19 | $1,558 |
| Obtain senior approval |  | 1 | 1 | 1 | 19 | 19 | 19 | 57 | $4,104 |
| Complete and submit package |  | 0 | 10 | 1 | 0 | 190 | 19 | 209 | $16,359 |
| ***Subtotal*** | **19** | **1** | **12** | **2** | **19** | **228** | **38** | **285** | **$22,021** |
| **Innovators** |
| Review application and program information |  | 0 | 1 | 0 | 0 | 5 | 0 | 5 | $410  |
| Obtain senior approval |  | 1 | 1 | 1 | 5 | 5 | 5 | 15 | $1,080  |
| Complete and submit package1 |  | 0 | 10 | 1 | 0 | 50 | 5 | 55 | $4,305  |
| ***Subtotal*** | **5** | **1** | **12** | **2** | **5** | **60** | **10** | **75** | **$5,795** |
| **Retailers** |
| Review application and program information |  | 0 | 1 | 0 | 0 | 3 | 0 | 3 | $246  |
| Obtain senior approval |  | 1 | 1 | 1 | 3 | 3 | 3 | 9 | $648  |
| Complete and submit package |  | 0 | 10 | 1 | 0 | 30 | 3 | 33 | $2,583  |
| ***Subtotal*** | **3** | **1** | **12** | **2** | **3** | **36** | **6** | **45** | **$3,477** |
| **Supporters** |
| Review application and program information |  | 0 | 1 | 0 | 0 | 6 | 0 | 6 | $492  |
| Obtain senior approval |  | 1 | 1 | 1 | 6 | 6 | 6 | 18 | $1,296  |
| Complete and submit package |  | 0 | 10 | 1 | 0 | 60 | 6 | 66 | $5,166  |
| ***Subtotal*** | **6** | **1** | **12** | **2** | **6** | **72** | **12** | **90** | **$6,954** |
| **Purchasers and Distributors** |
| Review application and program information |  | 0 | 1 | 0 | 0 | 2 | 0 | 2 | $164  |
| Obtain senior approval |  | 1 | 1 | 1 | 2 | 2 | 2 | 6 | $432  |
| Complete and submit package |  | 0 | 10 | 1 | 0 | 20 | 2 | 22 | $1,722  |
| ***Subtotal*** | **2** | **1** | **12** | **2** | **2** | **24** | **4** | **30** | **$2,318** |
| **TOTAL** | ***35*** |  |  |  |  |  |  | ***525*** | ***$40,565*** |

Note: All respondents are from the private sector, other than potential respondents in the “Purchasers and Distributors” and “Supporters” categories which may include local and state governments.

**Agency**

|  |  |  |  |
| --- | --- | --- | --- |
| **Activities** | **Hours per Labor Category** | **Total Cost per Activity** | **Total Hours and Cost** |
| **Mgr. Hours** | **Tech. Hours** | **Mgr. Hours** | **Tech. Hours** | **Total Hours per Activity** | **Total Cost per Activity** |
| Distribute forms | 2 | 8 | $210 | $616 | 10 | $826 |
| Answer questions | 2 | 8 | $210 | $616 | 10 | $826 |
| Record / enter forms | 3 | 10 | $315 | $770 | 13 | $1,085 |
| Verify information; Make awards selection | 6 | 21 | $630 | $1,617 | 27 | $2,247 |
| Notify applicants of decision | 1 | 3 | $105 | $231 | 4 | $336 |
| **TOTAL** | ***14*** | ***50*** | ***$1,470*** | ***$3,850*** | ***64*** | ***$5,320*** |

**IC #4: Safer Choice cleaning service certification**

**Respondents**

|  |  |  |
| --- | --- | --- |
| **Collection Activity** | **Hours and Costs Per Respondent** | **Total Hours and Costs** |
| **Mgr.** | **Tech.** | **Cler.** | **Response Hours/Yr** | **Labor Cost/Year** | **Capital****Cost** | **O & M Cost\*** | **Number of Respon.\*\*** | **Total Hours/Yr** | **Total Cost/Yr** |
| **Partnership Agreements** |
| Review program information  | 1 | 1 | 0 | 2 | $175 | $0  | $0  | 10 | 20 | $1,750  |
| Fill out and submit third-party information request form | 0 | 2 | 1 | 3 | $205 | $0  | $0  | 10 | 30 | $2,050  |
| Establish agreement with third-party profiler | 1 | 1 | 1 | 3 | $216 | $0  | $750  | 10 | 30 | $9,660 |
| Work with third-party profiler to ensure information request form is complete and submit summary report to Safer Choice | 1 | 1 | 0 | 2 | $175 | $0  | $0  | 10 | 20 | $1,750  |
| Establish Partnership Agreement w/ Safer Choice | 1 | 1 | 0 | 2 | $175 | $0  | $0  | 10 | 20 | $1,750  |
| *Subtotal* | *4* | *6* | *2* | *12* | *$946* | *$0*  | *$750*  | *10* | *120* | *$16,960*  |
| **Renewals and Audits** |
| Partnership renewal and virtual audit | 0 | 2 | 1 | 3 | $205 | $0  | $750  | 1 | 3 | $955  |
| *Subtotal* | *0* | *2* | *1* | *3* | *$205*  | *$0*  | *$750*  | *1* | *3* | *$955*  |
| **TOTAL** |  |  |  |  |  |  |  | ***11*** | ***123*** | ***$17,915***  |

\* The cost for third-party profiler review and verification assumes that applications submitted by cleaning service providers will range in complexity, with the average cost likely to be $750 based on historical experience with the Safer Choice product certification program as well as conversations with cleaning service providers and trade associations.

\*\* This column reports the anticipated number of annual respondents after accounting for the implementation timeline for the new cleaning service certification program. Assumes the program will be ready to accept applications only in the final year of the three-year period, and that 30 applications will be received in that year (reported as an average of 10 applications annually). Also assumes that only 3 cleaning service provider partners will undergo an annual renewal/audit during the three-year period (reported as an average of 1 annually), as the majority of these renewals/audits will occur after the three-year period.

**Agency**

|  |  |  |
| --- | --- | --- |
| **Collection Activity** | **Hours and Costs Per Respondent** | **Total Hours and Costs** |
| **Mgr. Hours/Yr** | **Tech. Hours/Yr** | **Agency Hours/Yr** | **Labor Cost/Year** | **Capital / Startup Cost** | **O & M Cost** | **Number of Respon.\*** | **Total Hours/Yr** | **Total Cost/Yr** |
|
| **Cleaning and Non-Cleaning Products** |
| Review program application form and third-party profiler summary | 0 | 1 | 1 | $77  | $0  | $0  | 10 | 10 | $770  |
| Establish Partnership Agreement w/ cleaning service provider | 1 | 2 | 3 | $259  | $0  | $0  | 10 | 30 | $2,590  |
| Review partnership renewal and audit summary | 1 | 1 | 2 | $182  | $0  | $0  | 1 | 2 | $182  |
| **TOTAL** |  | ***11*** | ***42*** | ***$3,542***  |

\* This column reports the anticipated number of annual respondents after accounting for the implementation timeline for the new cleaning service certification program. Assumes the program will be ready to accept applications only in the final year of the three-year period, and that 30 applications will be received in that year (reported as an average of 10 applications annually). Also assumes that only 3 cleaning service provider partners will undergo an annual renewal/audit during the three-year period (reported as an average of 1 annually), as the majority of these renewals/audits will occur after the three-year period.

**IC #5: Third-party profiler solicitations**

**Respondents**

|  |  |  |
| --- | --- | --- |
| **Collection Activity** | **Hours and Costs Per Respondent** | **Total Hours and Costs** |
| **Mgr.** | **Tech.** | **Cler.** | **Response Hours/Yr** | **Labor Cost/Year** | **Number of Respon.\*\*** | **Total Hours/Yr** | **Total Cost/Yr** |
| **Third-party profilers for product certification** |
| Review program information | 1 | 2 | 0 | 3 | $257 | 3 | 9 | $771  |
| Fill out and submit third-party profiler application form | 5 | 20 | 1 | 26 | $2,146 | 3 | 78 | $6,438 |
| Conduct pilot product review exercise | 5 | 20 | 1 | 26 | $2,146 | 1 | 26 | $2,146  |
| Establish agreement w/ Safer Choice | 1 | 2 | 0 | 3 | $257 | 1 | 3 | $257  |
| *Subtotal* | *12* | *44* | *2* | *58* | *$4,806* | *3* | *116* | *$9,612*  |
| **Third-party profilers for cleaning service certification program** |
| Review program information | 1 | 2 | 0 | 3 | $257 | 3 | 9 | $771  |
| Fill out and submit third-party profiler application form | 1 | 3 | 1 | 5 | $380 | 3 | 15 | $1,140 |
| Conduct pilot cleaning service review exercise | 1 | 3 | 1 | 5 | $380 | 2 | 10 | $760 |
| Establish agreement w/ Safer Choice | 1 | 2 | 0 | 3 | $257 | 2 | 6 | $514  |
| *Subtotal* | *4* | *10* | *2* | *16* | *$1,274*  | *3* | *40* | $3,185  |
| **TOTAL** |  |  |  |  |  | ***6*** | ***156*** | ***$12,797*** |

Note: No capital or operating and maintenance costs are incurred by the Agency under this component of the ICR.

\* This column reports the number of annual respondents after accounting for the two-phase application process. For third-party profilers for product certification, assumes that 3 applications will be received annually and that 1 of those applications will be strong enough that the applicant is invited to complete the pilot product review exercise. For third-party profilers for cleaning service certification, assumes that 3 applications will be received annually and that 2 of those applications will be strong enough that the applicant is invited to complete the pilot cleaning service review exercise.

**Agency**

|  |  |  |
| --- | --- | --- |
| **Collection Activity** | **Hours and Costs Per Respondent** | **Total Hours and Costs** |
| **Mgr. Hours/Yr** | **Tech. Hours/Yr** | **Agency Hours/Yr** | **Labor Cost/Year** | **Number of Respon.\*** | **Total Hours/Yr** | **Total Cost/Yr** |
| **Third-party profilers for product certification** |
| Review application forms | 2 | 8 | 10 | $826  | 3 | 30 | $2,478  |
| Initiate pilot product review exercise for selected applicants | 1 | 1 | 2 | $182  | 1 | 2 | $182  |
| Review pilot product review exercise | 2 | 8 | 10 | $826  | 1 | 10 | $826  |
| Notify applicants of decision | 1 | 1 | 2 | $182  | 3 | 6 | $546  |
| Establish agreement with third-party profiler | 1 | 3 | 4 | $336  | 1 | 4 | $336  |
| *Subtotal* | *7* | *21* | *28* | *$2,352*  | *3* | *52* | *$4,368*  |
| **Third-party profilers for cleaning service certification program** |
| Review application forms | 1 | 4 | 5 | $413  | 3 | 15 | $1,239  |
| Initiate pilot cleaning service review exercise for selected applicants | 1 | 1 | 2 | $182 | 2 | 4 | $364  |
| Review pilot cleaning service review exercise | 1 | 4 | 5 | $413 | 2 | 10 | $826  |
| Notify applicants of decision | 1 | 1 | 2 | $182 | 3 | 6 | $546  |
| Establish agreement with third-party profiler | 1 | 3 | 4 | $336 | 2 | 8 | $672  |
| *Subtotal* | *5* | *13* | *18* | *$1,526*  | *3* | *43* | *$3,647*  |
| **TOTAL** |  | ***6*** | ***95*** | ***$8,015***  |

\* This column reports the number of annual respondents after accounting for the two-phase application process. For third-party profilers for product certification, assumes that 3 applications will be received annually and that 1 of those applications will be strong enough that the applicant is invited to complete the pilot product review exercise. For third-party profilers for cleaning service certification, assumes that 3 applications will be received annually and that 2 of those applications will be strong enough that the applicant is invited to complete the pilot cleaning service review exercise.