

Supporting Statement

EPA ICR 2183.09

DRUG TESTING FOR CONTRACTOR EMPLOYEES

Identification of the Information Collection

Title of the Information Collection

Drug Testing for Contractor Employees (Renewal), EPA ICR Number 2183.09 and OMB Control Number 2030-0044.

Short Characterization

This information collection request (ICR) applies to a contractor who performs response services at sensitive sites with serious security concerns where the Agency and public interest would best be protected through drug testing of contractor employees. The Contracting Officer or On-Scene Coordinator will designate significant security concerns in the contractual tasking document when the situation warrants. The contractor will test employees for the use of marijuana, cocaine, opiates, amphetamines, phencyclidine (PCP), and any other controlled substances. Only contractor employees who have been tested within the previous 90 calendar days and have passing drug test results may be directly engaged in on-site response work and/or on-site related activities at designated sites with significant security concerns. The testing for drugs must be completed prior to contract employee performance. The contractor shall maintain records associated with all drug tests for three years in accordance with [EPA Records Schedule 0569](#).

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.

The legal authority for this collection is [Title 5, Code of Federal Regulations, Parts 731, 732, and 736](#). The EPA has a responsibility to protect the public and Agency and contractor employees working on an emergency response incident by ensuring employees are not under the influence of marijuana, cocaine, opiates, amphetamines, PCP, and any other controlled substances. This process is necessary to allow the EPA to meet its responsibilities and mitigate the threat to the public health, welfare and the environment.

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.

Information is collected by response contractors for performing drug tests on contract employees before the individual employees perform contractual services for the EPA.

3. USE OF TECHNOLOGY: Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The information is collected by each contractor from each employee who will be working on a sensitive response site. Submissions are accepted in any format, as long as they provide a passing status of proposed employees and the date the test was given. No other information is submitted to the Agency, but compliance is mandatory and no employee may work on a response site with security concerns without passing the drug test. Only those contractor employees who have been tested within the previous 90 calendar days may be directly engaged in on-site response work and/or on-site related activities at designated sites with significant security concerns.

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.

Information requested from a contractor's employee to determine suitability to perform on a response contract is unique to a specific individual; this information cannot be obtained without a drug test.

5. MINIMIZING BURDEN ON SMALL ENTITIES: If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Separate or further simplified requirements for small entities are not practical because the stated objectives cannot be met under such alternatives. The requirements of the information collection apply to the awardees of the contract. Reasonable expense associated with the drug testing is reimbursable; therefore, small businesses are not expected to experience financial difficulties in fulfilling these requirements. There are numerous commercial sources that perform drug tests.

6. EFFECTS 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.

Information on the passing status of proposed employees and the date the test was given will be collected as needed as individuals are requested to work on a response site location under new or existing contracts.

7. GENERAL GUIDELINES: Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with OMB guidelines. If the collection

involves any of the requirements listed below, describe the special circumstances that make them necessary.

- * Requiring respondents to report information to the agency more often than quarterly
- * Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it
- * Requiring respondents to submit more than an original and two copies of any document
- * Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years
- * Using a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study
- * Using statistical data classification that has not been reviewed and approved by OMB
- * Including a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use
- * Requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

This ICR does not exceed any of the OMB guidelines found [5 CFR 1320.5\(d\)\(2\)](#).

8. PUBLIC COMMENT AND CONSULTATIONS

8a. PUBLIC COMMENT: If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

A notice to renew this information collection was posted to the [Federal Register](#) on May 29, 2024. No comments were received.

8b. CONSULTATIONS: Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once

every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

To determine contractor burden associated with the information collection identified in this request, the following vendors were contacted but did not respond; therefore the estimated burden figures from the existing ICR are considered to still be applicable. Estimated time to complete the information collection is described in Section 6, *Estimating the Burden and Cost of the Collection*.

Firm
Tech Law
Weston Solutions
Sovereign Consulting

9. PAYMENTS OR GIFTS TO RESPONDENTS: Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payments of gifts are provided.

10. PROVISIONS FOR PROTECTION OF INFORMATION: Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

The EPA contractor is responsible for collecting and maintaining information under this collection of information; therefore, each contractor will have his own procedures for ensuring confidentiality.

The EPA contractor is responsible for having the drug testing performed, and for providing, for work at sensitive sites, only those individuals who have passed the test within the previous 90 days.

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.

No questions concerning sexual behavior or attitudes, religious beliefs, or other matters usually considered private are included in this information collection.

12. ESTIMATES OF 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. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. 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 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 should be counted as an O&M, non-labor cost covered in Question 13.

12a. RESPONDENTS/NAICS CODES

Notification is provided from contractors of the passing status of proposed contractor and subcontractor employees who will perform services with regard to environmental emergencies involving the release, or threatened release, of oil, radioactive materials or hazardous chemicals that may potentially affect communities and the surrounding environment. Information is collected for employees of the contractors and subcontractors who perform work in sensitive sites or sensitive projects corresponding with the North American Industry Classification System (NAICS) code [562910](#) for *Remediation Services*. EPA is only requesting information on the status of proposed employees' drug test and the date of the drug testing.

12b. INFORMATION REQUESTED

Information on the passing status of proposed employees and the date the test was given will be collected as needed as individuals are requested to work on a response site location under new or existing contracts.

12c. RESPONDENT ACTIVITIES

Respondent burden estimates for this collection are based upon discussions with the contractors identified in 3(b) above and discussions with Agency personnel. The Agency anticipates that the contractor burden for complying with this requirement includes the time it takes for employees to provide the required information, the administrative time to manage a drug testing subcontract, the time to notify the Agency, and the effort to maintain the records.

12d. RESPONDENT HOUR AND LABOR BURDEN

Respondent burden estimates for this collection are based upon discussions with the contractors identified in 3(b) above and discussions with Agency personnel. The Agency

anticipates that the contractor burden for complying with this requirement includes the time it takes for employees to provide the required information, the administrative time to manage a drug testing subcontract, the time to notify the Agency, and the effort to maintain the records.

Respondent Cost Estimate

<u>Step</u>	<u>Collection Activity</u>	<u>Labor Category</u>	<u>Burden Hours</u>	<u>Loaded Rate</u>	<u>Cost</u>
1.	Time to provide sample	Employees	1.5 hours	\$75.12	\$ 112.68
2.	Cost of Drug Test (subcontract)		<i>flat rate</i>		\$ 50.00
3.	Manage Drug Test subcontract & review results	HR Manager	0.25 hour	\$185.18	\$ 46.30
4.	Submit notification	HR Manager	0.25 hour	\$185.12	\$ 46.30
5.	Maintain files	Admin. Support	<u>0.25 hour</u> 2.25 hours	\$59.13	<u>\$ 14.78</u>
Estimated Respondent Cost per Drug Test					\$270.06

Step 1 of the information collection is completed by a contractor employee working at a sensitive site. The 1.5 hour estimate is based upon information provided by the contractors who provided consultations. The contractors indicated that while it takes 15 minutes to provide a specimen, it does not take into account travelling to a lab, waiting to be called for the testing and returning to the job site. The cost for Step 2, having a third party perform a drug test, is based upon market research and input from the vendors surveyed. Vendors' costs for this ranged from \$28-\$85. OHS Health and Safety Services, one of the largest drug testing companies in the United States, estimates average costs at \$44 per test. OHS' prices range from \$25-\$65 depending on the volume purchased. This data can be found on the OHS website at www.ohsinc.com. For estimating purposes for this ICR, \$50 average was used. Steps 3 and 4, *reviewing suitability* and *notifying EPA*, are performed by a human-resource type manager responsible for personnel management and are estimated at 15 minutes based on vendor input. Administrative support personnel are responsible for completing step 5, which includes filing the background check in personnel records. This was estimated at 15 minutes based on vendor input.

The cost associated with this effort was estimated using hourly rates based upon the [May 2023 National Occupational Employment and Wage Estimates](#) published by the U.S. Department of Labor's Bureau of Labor Statistics. The occupational categories used are Hazardous Materials Removal Workers, Human Resource Manager, and Office and Administrative Support.

Since the labor rates used in this estimate are from 2023, an escalation factor of 3% was applied for each year to determine an average wage for the respective year. The cost for each labor category was determined by multiplying the escalated hourly labor rate by an estimated

loading factor of 2.95 to reflect industries' overhead, fringe benefits, and general and administrative costs for each year (2024-2027) that the ICR will be in effect. The 2.95 estimate was provided by an EPA cost analyst as representative of labor related burdens experienced by EPA contractors. The loaded labor costs for 2024 thru 2027 were added together then divided by three (number of years for the ICR) to arrive at an annualized labor cost for each labor category.

The following are the loaded labor rates used in the calculations in the table above:

Employee - Hazardous Materials Removal Worker:

2023 = $(\$25.69 \times 1.03) = \$26.46 \times 2.95 = \$ 78.06$
2024 = $(\$26.46 \times 1.03) = \$27.25 \times 2.95 = \$ 80.39$
2025 = $(\$27.25 \times 1.03) = \$28.06 \times 2.95 = \$ 82.77$
2026 = $(\$28.06 \times 1.03) = \$28.91 \times 2.95 = \$85.28$
2027 = $(\$28.91 \times 1.03) = \$29.77 \times 2.95 = \$87.82$
 $\$336.26/4 = \84.06

Human Resource Manager:

2023 = $(\$65.55 \times 1.03) = \$67.51 \times 2.95 = \$199.15$
2024 = $(\$67.51 \times 1.03) = \$69.53 \times 2.95 = \$205.13$
2025 = $(\$69.53 \times 1.03) = \$71.62 \times 2.95 = \$211.27$
2026 = $(\$71.62 \times 1.03) = \$73.77 \times 2.95 = \$217.62$
2027 = $(\$73.77 \times 1.03) = 75.98 \times 2.95 = \224.15
 $\$ 858.17/4 = \214.54

Administrative Support:

2023 = $(\$19.69 \times 1.03) = \$20.28 \times 2.95 = \$59.82$
2024 = $(\$20.28 \times 1.03) = \$20.88 \times 2.95 = \$61.62$
2025 = $(\$20.88 \times 1.03) = \$21.50 \times 2.95 = \$63.44$
2026 = $(\$21.50 \times 1.03) = \$22.14 \times 2.95 = \$65.33$
2027 = $(\$22.14 \times 1.03) = \$22.80 \times 2.95 = \$67.27$
 $\$257.66/4 = \64.41

All EPA contractor personnel performing at an EPA designated sensitive site with significant security concerns must be tested for the presence of marijuana, cocaine, opiates, amphetamines, PCP, and any other controlled substances. A site with significant security concerns is determined by the Agency and could be sites that involve law enforcement activities, any indoor cleanups (including household residences), drug lab cleanups, and response actions at geographically sensitive locations such as military installations and government buildings. The number of contractor employees expected to submit to drug testing is around 1,500 for the life of this ICR (3 years). This number was determined by estimating the number of drug tests that contractors provide in a year because they would be considered to have security concerns for the Agency. Annually, the Agency responds to roughly 450 incidences with an estimated 5% of these responses (23) that may be designated as having security concerns for the Agency.

There are both small and large businesses working in the field with diverse response site situations that require large variations in the number of employees. Contractors may be on-site for a few days or many years depending on the situation. Per the EPA Office of Acquisition Management's active contract list, there are currently about 50 contracts which require contractors to perform drug testing on employees working at sensitive sites. The number of annual drug tests performed by the companies ranged from 0 to 300, taking into account multiple tests for employees who are being tested quarterly. The government estimate is 500 tests for all contractors per year.

Total estimated annual hours per respondent for this request is 1,125 hours at a cost of \$135,030. The hours were calculated by multiplying the number of hours per occurrence, 2.25, by the estimated number of tests per year, 500. The cost was derived by multiplying the respondent cost per collection, \$270.06, by the estimated 500 occurrences per year. The total cost over the life of this ICR, three years, is \$405,090. The previous ICR estimated annual cost was \$133,010.

13. RESPONDENT ANNUAL COST (NON-LABOR) 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).

Respondent Cost Estimate

<u>Step</u>	<u>Collection Activity</u>	<u>Labor Category</u>	<u>Burden Hours</u>	<u>Loaded Rate</u>	<u>Cost</u>
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5.	Maintain files	Admin. Support	<u>0.25 hour</u>	\$59.13	<u>\$ 14.78</u>
			2.25 hours		
			Estimated Respondent Cost per Drug Test		\$270.06

Step 1 of the information collection is completed by a contractor employee working at a sensitive site. The 1.5 hour estimate is based upon information provided by the contractors who provided consultations. The contractors indicated that while it takes 15 minutes to provide a specimen, it does not take into account travelling to a lab, waiting to be called for the testing and returning to the job site. The cost for Step 2, having a third party perform a drug test, is based upon market research and input from the vendors surveyed. Vendors' costs for this ranged from \$28-\$85. OHS Health and Safety Services, one of the largest drug testing companies in the United States, estimates average costs at \$44 per test. OHS' prices range from

\$25-\$65 depending on the volume purchased. This data can be found on the OHS website at www.ohsinc.com. For estimating purposes for this ICR, \$50 average was used. Steps 3 and 4, *reviewing suitability* and *notifying EPA*, are performed by a human-resource type manager responsible for personnel management and are estimated at 15 minutes based on vendor input. Administrative support personnel are responsible for completing step 5, which includes filing the background check in personnel records. This was estimated at 15 minutes based on vendor input. The cost associated with this effort was estimated using hourly rates based upon the [May 2023 National Occupational Employment and Wage Estimates](#) published by the U.S. Department of Labor's Bureau of Labor Statistics. The occupational categories used are Hazardous Materials Removal Workers, Human Resource Manager, and Office and Administrative Support.

Since the labor rates used in this estimate are from 2023, an escalation factor of 3% was applied for each year to determine an average wage for the respective year. The cost for each labor category was determined by multiplying the escalated hourly labor rate by an estimated loading factor of 2.95 to reflect industries' overhead, fringe benefits, and general and administrative costs for each year (2023-2027) that the ICR will be in effect. The 2.95 estimate was provided by an EPA cost analyst as representative of labor related burdens experienced by EPA contractors. The loaded labor costs for 2023 thru 2027 were added together then divided by three (number of years for the ICR) to arrive at an annualized labor cost for each labor category.

The following are the loaded labor rates used in the calculations in the table above:

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$$\$257.66/4 = \$64.41$$

(ii) Capital/ Start-up Costs

Respondents will not be required to acquire capital goods to provide the requested information; therefore, capital start-up costs have not been included in this estimate. 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 take into account 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 time 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. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

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.

Respondent Cost Estimate

<u>Step</u>	<u>Collection Activity</u>	<u>Labor Category</u>	<u>Burden Hours</u>	<u>Loaded Rate</u>	<u>Cost</u>
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5.	Maintain files	Admin. Support	<u>0.25 hour</u> 2.25 hours	\$59.13	<u>\$ 14.78</u>
Estimated Respondent Cost per Drug Test					\$270.06

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The cost associated with this effort was estimated using hourly rates based upon the [May 2023 National Occupational Employment and Wage Estimates](#) published by the U.S. Department of Labor's Bureau of Labor Statistics. The occupational categories used are Hazardous Materials Removal Workers, Human Resource Manager, and Office and Administrative Support.

Since the labor rates used in this estimate are from 2023, an escalation factor of 3% was applied for each year to determine an average wage for the respective year. The cost for each labor category was determined by multiplying the escalated hourly labor rate by an estimated loading factor of 2.95 to reflect industries' overhead, fringe benefits, and general and administrative costs for each year (2023-2027) that the ICR will be in effect. The 2.95 estimate was provided by an EPA cost analyst as representative of labor related burdens experienced by EPA contractors. The loaded labor costs for 2023 thru 2027 were added together then divided by three (number of years for the ICR) to arrive at an annualized labor cost for each labor category.

The following are the loaded labor rates used in the calculations in the table above:

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Administrative Support:

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 2024 = (\$20.28 x 1.03) = \$20.88 x 2.95 = \$61.62
 2025 = (\$20.88 x 1.03) = \$21.50 x 2.95 = \$63.44
 2026 = (\$21.50 x 1.03) = \$22.14 x 2.95 = \$65.33
 2027 = (\$22.14 x 1.03) = \$22.80 x 2.95 = \$67.27
 \$257.66/4 = \$64.41

14. AGENCY BURDEN ESTIMATES: 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.

Agency Activities

The EPA contracting officers are responsible for ensuring that they have received notification from the contractor that all of its employees working under the contract at a response site with security concerns have passed the drug test for the use of marijuana, cocaine, opiates, amphetamines, PCP, and any other controlled substances.

Estimating Agency Burden and Cost

<u>Step</u>	<u>Collection Activity</u>	<u>Labor Category</u>	<u>Burden Hours</u>	<u>Loaded Rate</u>	<u>Cost</u>
1.	Ensure Compliance and document file	GS-13	0.25 hour	\$113.54	\$28.38
Estimated Agency cost per drug test					\$28.38

Drug testing is the responsibility of the EPA contractor. The Agency is primarily responsible for ensuring that contractors notify the Agency that its employees have passed the drug test. The Agency’s current effort is estimated to be performed by an employee at the GS-13 level and will take approximately fifteen minutes, which is about the same as previous years. The [GS-13 hourly salary for 2023](#) with a locality pay for “Rest of US” is \$53.49, and a 3 percent escalation factor has been applied for any cost-of-living increases given to federal workers in 2023 and 2024. These wage rates were then multiplied by a factor of 2.16 to reflect Federal employee benefits. The 2.16 estimate was provided by an EPA cost analyst as representative of labor-related burdens for government employees. The loaded labor costs for 2024 thru 2027 were

added together then divided by three (number of years for the ICR) for an annualized loaded rate of \$105.44 for the three years the ICR is in effect.

$$\begin{aligned}
 2023 &= (\$53.49 \times 1.03) = \$55.09 \times 2.16 = \$119.00 \\
 2024 &= (\$55.09 \times 1.03) = \$56.74 \times 2.16 = \$122.56 \\
 2025 &= (\$56.74 \times 1.03) = \$58.44 \times 2.16 = \$126.23 \\
 2026 &= (\$58.44 \times 1.03) = \$60.19 \times 2.16 = \$130.01 \\
 2027 &= (\$60.19 \times 1.03) = \$61.99 \times 2.16 = \$133.91 \\
 &\qquad\qquad\qquad \$512.71/4 = \$128.18
 \end{aligned}$$

Collection Methodology and Management

The information is collected by each contractor from each employee who will be working on a sensitive response site. Submissions are accepted in any format, as long as they provide a passing status of proposed employees and the date the test was given. No other information is submitted to the Agency, but compliance is mandatory and no employee may work on a response site with security concerns without passing the drug test. Only those contractor employees who have been tested within the previous 90 calendar days may be directly engaged in on-site response work and/or on-site related activities at designated sites with significant security concerns.

<u>Step</u>	<u>Collection Activity</u>	<u>Labor Category</u>	<u>Burden Hours</u>	<u>Loaded Rate</u>	<u>Cost</u>
1.	Ensure Compliance and document file	GS-13	0.25 hour	\$113.54	\$28.38
Estimated Agency cost per drug test					\$28.38

Drug testing is the responsibility of the EPA contractor. The Agency is primarily responsible for ensuring that contractors notify the Agency that its employees have passed the drug test. The Agency’s current effort is estimated to be performed by an employee at the GS-13 level and will take approximately fifteen minutes, which is about the same as previous years. The [GS-13 hourly salary for 2020](#) with a locality pay for “Rest of US” is \$49.54, and a 3 percent escalation factor has been applied for any cost-of-living increases given to federal workers in 2023 or 2024. These wage rates were then multiplied by a factor of 2.16 to reflect Federal employee benefits. The 2.16 estimate was provided by an EPA cost analyst as representative of labor-related burdens for government employees. The loaded labor costs for 2023 thru 2027 were added together then divided by three (number of years for the ICR) for an annualized loaded rate of \$105.44 for the three years the ICR is in effect.

$$\begin{aligned}
 2023 &= (\$53.49 \times 1.03) = \$55.09 \times 2.16 = \$119.00 \\
 2024 &= (\$55.09 \times 1.03) = \$56.74 \times 2.16 = \$122.56 \\
 2025 &= (\$56.74 \times 1.03) = \$58.44 \times 2.16 = \$126.23 \\
 2026 &= (\$58.44 \times 1.03) = \$60.19 \times 2.16 = \$130.01
 \end{aligned}$$

$$2027 = (\$60.19 \times 1.03) = \$61.99 \times 2.16 = \$133.91$$
$$\$512.71/4 = \$128.18$$

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

There is no change in burden.

16. PUBLICATION OF DATA: For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The results of the information collection will not be published.

17. DISPLAY OF OMB CONTROL NUMBER EXPIRATION DATE ON INSTRUMENTS: If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

EPA will display the expiration date for OMB approval.

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

There are no exceptions to the topics of the certification statement.