

**Supporting Statement
Health Resources and Services Administration
Environmental Information and Documentation (EID)**

JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

The Health Resources and Services Administration (HRSA) is requesting an extension of Office of Management and Budget (OMB) approval of OMB# 0915-0324, the Environmental Information and Documentation (EID) form. HRSA proposes extension of the PRA approval for the Environmental Information and Documentation (EID) checklist, which consists of information that the agency is required to obtain to comply with the National Environmental Policy Act of 1969 (NEPA) as amended by the Fiscal Responsibility Act (FRA) of 2023. The revisions are not substantive and will only update some of the language in the text. For example, the EID references the FRA and Executive Order 14908 on Environmental Justice in existing parts of the form.

In 2009, the EID was initially approved via emergency clearance procedures to ensure the timely availability of data to make award determinations for grants supporting construction and equipment under the American Recovery and Reinvestment Act (ARRA, P.L. 111-5). ARRA, signed into law February 17, 2009, provided \$1.5 billion in grants to support construction, renovation and equipment, and the acquisition of health information technology systems for health centers including health center controlled networks receiving operating grants under section 330 of the Public Health Service (PHS) Act, as amended (42 U.S.C. 254b). Section 1609 of ARRA created an additional requirement for HRSA to publicly report on Agency review and compliance with the National Environmental Policy Act (NEPA) of 1969 (P.L. 91-190), ARRA supported grant projects.

Additional and ongoing need for the EID form (as amended and approved in 2013 and extended in 2016, 2019, and 2022) has been authorized by Section 330 of the Public Health Service Act, 42 U.S.C. 254b, as amended; Section 10503(b) of the Patient Protection and Affordable Care Act of 2010, P.L. 111-148; Division G, Title II, p. 2466, Consolidated and Further Continuing Appropriations Act, 2015, P.L. 113-235; Division B, Title VIII of the Bipartisan Budget Act of 2018 (Public Law 115-123); Additional Supplemental Appropriations for Disaster Relief Act, 2019 (PL 116-20) Title XVIII; Paycheck Protection Program and Health Care Enhancement Act; Coronavirus Aid, Relief, and Economic Security (CARES) Act (P.L. 116-136); and Section 2601 of the American Rescue Plan Act of 2021 (P.L.117-2) and Congressionally Directed Spending (CDS), FY 2022 Consolidated Appropriations Act (P.L. 117-103), Consolidated Appropriations Act, 2023 (P.L. 117-328) and Further Consolidated Appropriations Act 2024 (P.L. 118-47).

NEPA, the implementing regulations under 40 CFR parts 1500-1508, and the HHS General Administration Manual Part 30 Environmental Protection procedures, requires HRSA to consider the potential impacts of a proposed action on the human environment prior to committing the Agency to the action. The NEPA process incorporates consideration of other related federal

environmental and historic preservation laws with which HRSA and applicants must also comply. HRSA uses the information collected to make a determination as to NEPA compliance, and the EID becomes part of the administrative record for grantees to meet their assurances requirements for receiving a grant.

A completed EID is required from all applicants requesting HRSA program funding that supports capital improvements that have the potential to significantly affect the human environmental, such as construction/expansion or alteration/renovation activities as defined in the associated HRSA program guidance, or installation of fixed equipment. This form is designed to minimize hourly burden on grant applicants while still meeting the current minimum requirements for NEPA.

2. Purpose and Use of Information Collection

The EID collects specific project and site related information not collected in other application forms. Applicants provide the information requested in the EID to qualify to receive benefits in the form of grants for purposes outlined in the applicable law. HRSA will use the information provided in the EID along with information in the overall program application to determine the level of environmental review required under NEPA for construction related awards.

The series of questions in the EID collects specific project and site related information not collected in other application forms. This information is needed to determine the level of review required under NEPA and related laws. For example, information submitted on the EID may show that the proposed project impact is minimal and therefore the project requires no further review under NEPA and other related laws. Alternatively, the results of the EID may also identify that the proposed project does require further review and evaluation such as: 1) the preparation and public notice of an Environmental Assessment under NEPA; 2) consultation under Section 106 of the National Historic Preservation Act (NHPA); 3) site testing for the presence of hazardous materials such as asbestos or lead; or 4) further consultation and coordination with other Federal Agencies on issues such as endangered species, floodplain management or wetland permits.

The questions provide information relevant to the following laws:

- 42 U.S.C. § 4321 et seq., National Environmental Policy Act
- Patient Protection and Affordable Care Act (111-148)
- Health Center Consolidation Act 1996, Section II, Subpart I, (e)(2) and (3)
- Department of Health and Human Services General Administration Manual Part 30, Environmental Protection
- 16 U.S.C. § 470, National Historic Preservation Act, Section 106, as amended
- Executive Order 12699 Seismic Safety of Federal and Federally Assisted or Regulated New Building Construction
- 45 CFR Part 15, Uniform relocation assistance and real property acquisition for Federal and federally assisted programs. Implements 42 U.S.C. 4601, et seq.

- 42 U.S.C. 4001 et seq., National Flood Insurance Act and National Flood Disaster Protection Act, as amended
- Executive Order 11990, Protection of Wetlands
- Executive Order 11988, Floodplain Management
- Executive Order 12898, Environmental Justice
- Executive Order 14096, Revitalizing Our Nation's Commitment to Environmental Justice for All
- Executive Order 13287, Preserve America
- 16 U.S.C. § 1531 et seq., Endangered Species Act
- 16 U.S.C. § 3501 et seq., Coastal Barrier Resources Act
- 16 U.S.C. § 1451 et seq., Coastal Zone Management Act
- 33 U.S.C. § 1251 et seq., Federal Water Pollution Control Act, as amended. (Known as the Clean Water Act)
- 42 USC 7401, et seq., Clean Air Act
- 42 U.S.C. § 300f et seq., Safe Drinking Water Act, as amended
- 45 CFR § 74.16, 42 U.S.C. § 6901 et seq., Resource Conservation and Recovery Act (RCRA)
- 42 U.S.C. § 9601 et seq., Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended
- 16 U.S.C. §1271 et seq., Wild and Scenic Rivers Act

3. Use of Improved Information Technology and Burden Reduction

Applications and supporting documentation can be submitted electronically through HRSA's Electronic Handbook system (EHB). Information related to HRSA funding opportunities for construction projects, including acquisition of health information technology systems, can be found for various programs at <http://www.hrsa.gov/>.

4. Efforts to Identify Duplication and Use of Similar Information

The information requested is specific to the requirements of NEPA and is not available elsewhere.

5. Impact on Small Businesses or Other Small Entities

This activity does not have a significant impact on small entities.

6. Consequences of Collecting the Information Less Frequently

Applicants requesting funds for construction must submit the EID to determine HRSA's review and compliance requirements under NEPA and related laws. If such information is not submitted, HRSA will be unable to award funds as mandated under authorizing legislation.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

The data are collected in a manner consistent with guidelines contained in 5 CFR 1320.5(d)(2).

8. Comments in Response to the Federal Register Notice/Outside Consultation

Section 8A:

A 60-day Federal Register Notice of this current form was published in the *Federal Register* on October 24, 2024, vol. 89, No. 206; pp. 84898-99. There were no public comments.

A 30-day Federal Register Notice of this current form was published in the *Federal Register* on January 17, 2025, vol. 90, No. 11; pp. 5915-16.

Section 8B:

The HHS Environmental Office and the HRSA Office of Financial Assistance and Acquisition (OFAAM) Office of Special Activities (OSA) Management (OFAAM) were consulted on the contents of the EID.

In addition, several users of the form outside of the Agency were consulted, with the checklist. The feedback participants tended to have experience with environmental and historic preservation work for projects and initially commented on time required to fulfill the NEPA/HP requirements for the project vs just completing the checklist. After clarifying that the feedback was for the checklist only, most participants agreed to the approximately (1) hour of burden. (the average of the projected burden changed in costs (from \$48.12 to \$96.24 to account for overhead, as shown below:).

Creek Valley Health Clinic
Business Official
PO Box 418
Colorado City
Mohave, AZ 86021

Chief Executive Officer
Community Health Network
1346 East Broadway
Pearland, TX 77581

Chief Executive Officer
Lee County Cooperative Clinic
530 Wes Atkins BLVD
Marianna, AR 72360

Accounting Official
Prymed Medical Care, Inc
PO Box 1427
CIALES, PR 00638

Chief Executive Officer
Choptank Community Health System
PO BOX 660
Denton MD 21629

9. Explanation of any Payment/Gift to Respondents

Respondents will not receive any payments or gifts.

10. Assurance of Confidentiality Provided to Respondents

This request does involve the limited collection of individual level or personally identifiable information (PII),(names and signatures). Data is not retrieved through identifier. Data will be private to the extent required by law.

11. Justification for Sensitive Questions

There are no questions of a sensitive nature.

12. Estimates of Annualized Hour and Cost Burden

12A. Estimated Annualized Burden Hours

HRSA estimates that approximately 1,500 grantees per year will apply for grants that are related to construction using the standard form (SF) 424C form, requiring a burden of 1 hour per response to respond to the questions regarding compliance with NEPA. The form will be filled out once.

The annual estimate of burden is as follows:

Form Name	Number of Respondents	Number or Responses per Respondent	Average Burden per Response (in hours)	Total Burden Hours
EID Checklist	1,500	1	1	1,500
Total	1,500			1,500

12B. Estimated Annualized Cost Burden

The EID Checklist is expected to be filled out by an Environmental Engineer, who has a median wage of \$48.12 per hour (<http://www.bls.gov/oes/current/oes172081.htm>). Median wages are multiplied by 2 for the purposes of estimating annualized cost burden to account for overhead costs. Therefore the estimated annualized cost burden is \$144,360.

Form Name	Total Burden Hours	Total Wage Rate	Total Cost Burden Hours
EID Checklist	1,500	\$ 96.24	\$144,360
Total	1,500	\$ 96.24	\$144,360

* Source: <http://www.bls.gov/oes/current/oes172081.htm>.

13. Estimates of other Total Annual Cost Burden to Respondents or Recordkeepers/Capital Costs

There is no capital or start-up costs for this activity. Other than their time, there is no cost to respondents.

14. Estimated Cost to the Federal Government

HRSA's Grants Policy office has determined that the estimated annual cost to the federal government for this activity is approximately \$525,000 for review of applicant information regarding compliance with NEPA. The work will primarily be performed by contractors. Some of the EIDs may be reviewed by in-house qualified personnel, computed based on GS13 step 6, Washington DC/Rockville MD salary (including locality pay) of \$65.94 per hour (multiplied by 1.5 for overhead = \$98.91: 200 reviews x \$98.91 = \$19,782. The total annual cost to the federal government is estimated to be \$544,782.

15. Explanation for Program Changes or Adjustments

The current burden inventory is 1,500 hours. This current request is for 1,500 hours-no increase of hours.

16. Plans for Tabulation, Publication, and Project Time Schedule

The data submitted as part of this information collection will not be broadly published. The data received through forms that are included in grant applications, like the Environmental Checklist, would be pre-decisional and releasing that data could be misleading. For applications and implemented projects, HRSA provides public notice, including expanded checklist information, in environmental assessments (EAs) as required or with the publication of the Programmatic Environmental Assessment (PEA). Applicants and award recipients provide public notice in a variety of fashions including web postings, newspaper articles, and public meetings. The record of the public notice is maintained in the HRSA electronic handbook (EHB).

There will be no statistical analysis of the information received from the Environmental Information Documentation (EID). In addition, there will be no additional publication of the information reported in the EID. The EID includes applicant personal identifiable information

(PII) and the PII should not be released. Most of HRSA supported projects are covered by Programmatic Environmental Assessment (PEA) and the aggregate summary information of environmental effects are published with the PEA. The PEA and public notice are posted on the HRSA Capital Environmental and Historic Preservation Technical Assistance website. (<https://bphc.hrsa.gov/funding/funding-opportunities/capital-development-grants/environmental-historic-preservation-technical-assistance>). The Department of Health and Human Services Environmental Office is preparing to publish a website that will include unique identifier and environmental review information for each EA, including HRSA EAs and the website information will be available to the public.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

The OMB number and Expiration date will be displayed on every page of every form/instrument

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.