

U.S. Environmental Protection Agency Information Collection Request

Title: Environmental Justice CPS and G2G Programs: Progress and Final Reporting Information Collections

OMB Control Number: 2035-NEW

EPA ICR Number: 2807.01

Abstract

The U.S. Environmental Protection Agency (EPA) makes competitive financial assistance awards to support projects that tackle environmental, public health, and energy challenges across the country. This is accomplished by working directly with community-based organizations (CBOs) and state, local, territorial, and tribal governments that have strong ties to the communities in which they are working. EPA fosters a collaborative approach to tackling some of the most critical challenges in the most overburdened communities by encouraging projects that involve multiple stakeholders including States, local governments, and tribal governments. To help get resources and funding to underserved and overburdened communities EPA offers Environmental Justice Collaborative Problem Solving (EJCPS) and Environmental Justice Government to Government (EJG2G) cooperative agreement programs. With this Information Collection Request (ICR), EPA seeks authorization to collect post-award information in the form of semi-annual progress reports and final reports from each grantee to track their progress, with respect to effectiveness (e.g., the extent to which projects achieved their objectives, goals, and targets), efficiency (e.g., the extent to which projects delivered activities and outputs on schedule and within budget), and equity (e.g., the extent to which investments and benefits flowed to disadvantaged communities that are marginalized, underserved, and overburdened by pollution). Collection of this information enables EPA to assess and manage the EJCPS and EJG2G programs, which ensures responsible stewardship of public funds; rigorous evidence-based learning and improvement; and transparent accountability to the American public.

Total (3-Year) Respondent Burden & Costs

Respondents	Burden Hours	Labor Costs	Non-Labor Costs	Total Costs
217	52,080	\$2,983,663	\$0	\$2,983,663

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.

Overview

The U.S. Environmental Protection Agency (EPA) makes competitive financial assistance awards to support projects that tackle environmental, public health, and energy challenges across the country. This is accomplished by working directly with community-based organizations (CBOs) and state, local, territorial, and tribal governments that have strong ties to the communities in which they are working. EPA fosters a collaborative approach to tackling some of the most critical challenges in the most overburdened communities by encouraging projects that involve multiple stakeholders including States, local governments, and tribal governments.

To help get resources and funding to underserved and overburdened communities EPA offers Environmental Justice Collaborative Problem Solving (EJCPS) and Environmental Justice Government to Government (EJG2G) cooperative agreement programs.

The 2022 [Inflation Reduction Act \(IRA\)](#)¹ created the Environmental and Climate Justice block grant program in section 138 of the [Clean Air Act](#)² and provided EPA with grant funding for projects to benefit disadvantaged communities. The EJCPS and EJG2G programs are funded through the IRA. Additionally, Congress provided EPA with both funding and expanded authority to further environmental justice through financial assistance programs in the Consolidated Appropriations Act, 2022 ([Public Law 117-103](#))³, which provided funding for environmental justice implementation and training grants. These programs are designed to meet the goals and objectives of two Executive Orders issued by the Biden Administration that demonstrate the EPA's and Administration's commitment to achieving environmental justice and embedding environmental justice into Agency programs: [Executive Order 13985](#)⁴ (*Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*) and [Executive Order 14008](#)⁵ (*Tackling the Climate Crisis at Home and Abroad*).

The EJCPS and EJG2G programs are designed to address multi-statute environmental and/or public health issues. The EJCPS and EJG2G grantees will operate in cooperative agreements with EPA in their efforts to collaborate and partner with other stakeholders to develop solutions that will significantly address environmental and/or public health issue(s) in communities disproportionately burdened by environmental harms and risks. These projects will help transform disadvantaged and underserved communities into healthy, thriving communities capable of addressing the environmental and public health challenges they have historically faced, as well as current and future challenges.

With this Information Collection Request (ICR), EPA seeks authorization to collect information in progress reports and a final report from each grantee to track their progress, with respect to *effectiveness* (e.g., the extent to which projects achieved their objectives, goals, and targets), *efficiency* (e.g., the extent to which projects delivered activities and outputs on schedule and within budget), and *equity* (e.g., the extent to

¹ URL: <https://www.congress.gov/bill/117th-congress/house-bill/5376/text>

² URL: <https://www.congress.gov/bill/101st-congress/senate-bill/1630>

³ URL: <https://www.congress.gov/117/plaws/publ103/PLAW-117publ103.pdf>

⁴ URL: <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/>

⁵ URL: <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/>

which investments and benefits flowed to disadvantaged communities that are marginalized, underserved, and overburdened by pollution). Collection of this information enables EPA to assess and manage the EJCPs and EJG2G programs, which 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 two instruments:

- (1) *Progress reports submitted by grantees semi-annually*, which document their planned and actual milestones, activities, target audiences, partners, outputs, outcomes, timelines, and locations of activities or benefits;
- (2) *Final reports*, submitted by grantees 120 days after the listed end date on the EPA award documentation (60 days after the last progress report), documenting progress towards medium- and long-term outcomes over the life of the grant.

Legal and Administrative Requirements

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

1. EPA's *general regulation for financial assistance programs* establishes the minimum management requirements for recipients of EPA's financial assistance programs. The reports submitted by the grantees under this ICR fulfill the information collection and reporting requirements included in EPA regulations 2 CFR Parts [200](#)⁶ and [1500](#).⁷
2. The *Government Performance and Results Modernization Act of 2010 (GPRM-Mod)*⁸ 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 for the EJCPs and EJG2G programs via the methodologies covered by this ICR—including reports from the grantees and input from communities and stakeholders—will be included in the APR.
3. The *Digital Accountability and Transparency Act of 2014 (DATA Act)*⁹ 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 will need to collect information from the grantees about the location of each funded activity and its associated place of performance.

⁶ URL: <https://www.govinfo.gov/app/details/CFR-2014-title2-vol1/CFR-2014-title2-vol1-part200>

⁷ URL: <https://www.govinfo.gov/app/details/CFR-2015-title2-vol1/CFR-2015-title2-vol1-part1500>

⁸ URL: <https://www.congress.gov/bill/111th-congress/house-bill/2142>

⁹ URL: <https://www.congress.gov/bill/113th-congress/senate-bill/994>

4. [Justice40](#)¹⁰ is a whole-of-government initiative launched by the Biden-Harris Administration in 2021, which 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](#)¹¹, 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 must collect information from each grantee about the location of each funded activity and its area of impact, at the appropriate and feasible level of specificity.
5. The *Foundations for Evidence-Based Policymaking Act of 2018* ([Evidence Act](#)¹²) 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. This legislation 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 for the EJPCS and EJG2G programs via the post-award reports submitted by the grantees will help develop an evidence base to address the effectiveness, efficiency, and equity of the EJPCS and EJG2G programs' activities. This evidence base, 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.

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.

EPA will collect information from each grantee across two post-award instruments: (1) progress reports and (2) final reports. EPA 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.

Progress Reports

EPA will collect semi-annual progress reports from each grantee for the duration of the funding period. This timeline was chosen based on the schedule along which progress on project activities can be documented and reported.

In line with Agency strategic goals, EJPCS and EJG2G program objectives, and submitted workplans, each grantee will be asked to provide **six categories of information** in the progress reports that cover the specified six-month reporting period:

1. Project Activities, Milestones, and Special Considerations

¹⁰ URL: <https://www.whitehouse.gov/environmentaljustice/justice40/>

¹¹ URL: <https://www.whitehouse.gov/wp-content/uploads/2021/07/M-21-28.pdf>

¹² URL: <https://www.congress.gov/bill/115th-congress/house-bill/4174>

2. Progress to Date
3. Program Management Updates
4. Look Ahead
5. Feedback
6. Optional: Images of key activities and events

EPA will use these reports to determine progress in relation to the approved schedule and milestones during the project. Tracking progress at regular intervals will enable 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 the information will also facilitate the collection and dissemination of success stories and best practices in real time, thus contributing to learning and improvement across the grantees within the EJCPs and EJG2G programs.

Final Reports

The final report will summarize each grantee's work on the project during the entire period of performance, and the extent to which the work has met the project's objectives.

In line with Agency strategic goals, the EJCPs and EJG2G program objectives, and submitted workplans, each grantee will be asked to report on four categories of information in the final reports:

1. Project Summary and Overview
2. Project Accomplishments by Work Area
3. Feedback
4. Optional Project Photos (not required)

EPA will use the final reports to assess and report the grantees' performance relative to program objectives.

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 adapting this means of collection. Also describe any consideration of using information technology to reduce burden.

With this ICR, EPA is seeking approval to require funding recipients to submit information via specified progress and final 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 grantees. All forms will be completed and submitted electronically, via systems that are currently in development.

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.

This ICR requests authorization for the collection of information that is not currently collected and otherwise would not be collected. There is currently no mechanism for systematic post-award reporting for the EJCPs and EJG2G programs, with respect to the set of instruments and methodologies outlined in this ICR and the uses outlined in this ICR. EPA has determined that this information is not currently held by EPA or any other federal agency.

This ICR includes information collection instruments, methodologies, and uses of information that are not currently authorized by existing general and generic ICRs at EPA, as summarized below.

1. *General Administrative Requirements for Assistance Programs*
(OMB Control Number [2030-0020](#))

The progress and final reports authorized by this ICR will differ from those covered by EPA's General Administrative Requirements ICR in the following ways:

- a. A specified set of reporting forms will be authorized for use;
- b. A comprehensive set of information (activities, target audiences, partners, outputs, outcomes, timelines, location data) will be authorized for collection; and
- c. A specific electronic submission methodology (i.e., information entered into an online database) will be authorized for use.

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.

EPA has considered whether to establish different reporting requirements for small businesses and other small entities and has determined that:

1. Different reporting requirements among recipients will result in inconsistent data that may reduce the Agency's ability to oversee and report on program activities and accomplishments;
2. The burden imposed by this information collection is relatively small and small entities should not be unduly burdened by the reporting requirement; and
3. The EJCPs and EJG2G programs are voluntary and grantees who elected to enter into the cooperative agreements with EPA have determined that the expected benefits of participation outweigh any burden associated with preparing the responses.

EPA will assist grantees with compliance against financial and program performance reporting requirements. EPA Project Officers will meet regularly with their designated grantees and will document their questions and concerns; EPA staff will then determine the appropriate resources and support to address each issue.

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.

EPA recognizes the importance of balancing the need for data collection efforts against respondent burden and costs. The semi-annual progress reporting schedule set out in this ICR is consistent with the Agency's reporting schedule for financial assistance programs. As noted in 2 CFR Part 200, Uniform

Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, grantees are required to report updates on their respective projects quarterly or semi-annually throughout the project's period of performance, followed by a final report at the completion of the project.

EPA has determined that the semi-annual reporting schedule is necessary to adequately track awardee progress in completing the proposed activities, and to measure project outcomes. Less frequent collection would weaken EPA's ability to oversee and manage the EJCPs and EJG2G 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 the 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.

Information collections for the EJCPs and EJG2G programs will be conducted in accordance with the Paperwork Reduction Act [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.

The grantees will not be required to report information to EPA more often than semi-annually and will be provided the relevant forms and instructions at least 30 days in advance. The grantees will not be required to submit more than one original and two copies of any document.

In conjunction with OMB's general guidelines, grant recipients must retain all financial records, supporting documents, accounting books and other evidence of program activities for three years after submission of the final report. If any litigation, claim, or audit is started before the expiration of the three-year period, the recipient must maintain all appropriate records until these actions are completed and all issues resolved.

The grantees will not be required to submit Confidential Business Information (CBI). If a participant feels that any information requested would be CBI, the participant may request that such information be treated as confidential. All confidential data will be handled in accordance with 40 CFR 122.7, 40 CFR Part 2, and EPA's *Security Manual* Part III, Chapter 9, dated August 9, 1976. Any claim of confidentiality must be asserted at the time of submission.

8. PUBLIC COMMENT AND CONSULTATIONS

8a. Public Comment

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the Agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and

describe actions taken by the Agency in response to these comments. Specifically address comments received on cost and hour burden.

EPA published a notice in the Federal Register (FRL-11749-01-OEJECR) announcing the Agency's intention to request an OMB review of this information collection activity. This notice was published on February 21, 2024 in Volume 89, Number 35, Page 13079, and provided a 60-day period for public comment (Docket ID EPA-HQ-OEJECR-2024-0072). EPA received one public comment, which was not substantively related to the ICR.

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.

Consultation with eight selectees were undertaken so that EPA could understand the burden associated with completing the data collection covered in this ICR. These consultations included discussions concerning potential response problems, clarity of questions and instructions, and other aspects of respondent burden.

9. PAYMENTS OR GIFTS TO RESPONDENTS

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

Per OMB guidance, 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 post-award reports submitted by Grantees.

10. ASSURANCE OF CONFIDENTIALITY

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

EPA asks grantees 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 Security Manual Part III, Chapter 9, dated August 9, 1976. Any claim of confidentiality must be asserted at the time of submission. Any personal information included in a survey would be treated in accordance with the Privacy Act, section 14 of TSCA, and the Freedom of Information Act.

Progress reports and final reports submitted by grantees will be stored in an EPA IT system that meets the Agency's current policies and guidelines regarding security and privacy. A Privacy Threshold Analysis was conducted on this system, and a Privacy Impact Assessment Form was completed as part of the SORN process to safeguard sensitive information such as personally identifiable information (see <https://www.govinfo.gov/content/pkg/FR-2022-09-06/pdf/2022-19183.pdf>). Personal identifiers will not be used to retrieve specific information in this system.

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.

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.*
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Total Number of Respondents = 217

Total Annual Hour Burden (across all instruments and respondents) = 17,360 hours

Total Annual Cost (across all instruments and respondents) = \$994,554

12a. Respondents/NAICS Codes

Respondents will include entities who are eligible to receive awards, who are covered by the following NAICS codes: 813410 (Civic and Social Organizations) and 921120 (Local Governments).

EPA estimates labor costs using information from the Bureau of Labor Statistics (BLS) that, in the Agency's professional judgement, seems to best represent the pool of respondents. In this particular ICR, EPA uses the BLS "civic and social organizations" category.

12b. Information Requested

12c. Respondent Activities

12d. Respondent Burden Hours and Labor Costs

Information Requested:

1. *Progress reports submitted by grantees semi-annually*, which document their planned and actual milestones, activities, target audiences, partners, outputs, outcomes, timelines, and locations of activities or benefits;
2. *Final reports*, submitted by grantees 120 days after the listed end date on the EPA award documentation (60 days after the last progress report), documenting progress towards medium- and long-term outcomes over the life of the grant.

Respondent activities: The Grantees incur a burden in the process of preparing, completing, and submitting the requested information via progress reports and final reports.

Methodology: 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 with Grantees).
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).
3. Determine the number of responses for the three years (based on signed Terms and Conditions agreements with each Grantees).
4. Calculate the total burden hours per instrument (number of hours per response x number of responses).
5. Calculate the total cost per instrument (labor cost per response x 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 1 (below) includes the information calculated in each step of the methodology, 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.

Table 1: Estimated burdens and costs – Respondents					
Activity	1. Burden per Response (Hours)¹	2. Weighted Labor Cost per Response (Dollars)²	3. Number of Responses (3 years)³	4. Total Burden Hours (3 years)⁴	5. Total Labor Cost (3 years)⁵
Prepare, Complete, and Submit Progress Reports	40	\$2,291.60 (hourly = \$57.29)	1,085 (5 reports over 3 years x 217 Grantees)	43,400 hours	\$2,486,386
Prepare, Complete, and Submit Final Report	40	\$2,291.60 (hourly = \$57.29)	217 (1 final report x 217 Grantees)	8,680 hours	\$497,277
6. TOTALS for all three years⁶				52,080 hours	\$2,983,663
7. ANNUAL TOTALS per year⁷				17,360 hours	\$994,554

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 reporting framework outlined in each Grantee's signed Terms and Conditions.
- 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 = Annual totals per year** = Average number of hours and costs per year over the three-year period, for all instruments.

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.

Capital and Start-Up Costs

There are no specified capital or start-up costs for grantees to meet the EJCS and EJG2G program's post-award reporting requirements, as each grantee should already have the standard equipment (e.g., computer, relevant software packages) and infrastructure (e.g., work space, access to internet services) that is required to collate, store, and report the required information for the progress reports, and final report. No specialist equipment or infrastructure is needed to complete the post-award reports.

Operation and Maintenance and Purchase of Services

Grantees are not expected to incur any specified operation or maintenance costs in order to meet the programs' post-award 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.

14a. Agency Activities

EPA incurs a burden in the process of reviewing and processing the information collected via two post-award reports from Grantees: semi-annual progress reports, final reports.

14b. Agency Labor Cost

Total Annual Hour Burden to the Agency (across all instruments) = 2,893 hours

Total Annual Cost to the Agency (across all instruments) = \$278,715

Methodology: The burden imposed upon EPA was estimated using a seven-step process for each information collection 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 64% 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 (based on signed Terms and Conditions agreements with each Grantee).
4. Calculate the total burden hours per instrument (number of hours per response x number of responses).
5. Calculate the total cost per instrument (labor cost per response x 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 2 (below) includes the information calculated in each step of the methodology, 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.

Table 2: Estimated burdens and costs associated with post-award reports - EPA Staff					
Activity	1. Burden per Response (Hours)¹	2. Weighted Loaded Labor Cost per Response (Dollars)²	3. Number of Responses (3 years)³	4. Total Burden Hours (3 years)⁴	5. Total Labor Cost (3 years)⁵
Review and Process Progress Reports	5	\$481.65 (hourly = \$96.33)	1,085 (5 reports over 3 years x 217 Grantees)	5,425	\$522,590.25
Review and Process Final Report	15	\$1,444.95 (hourly = \$96.33)	217 (1 report x 217 Grantees)	3,255	\$313,554.15
6. TOTALS for all three years⁶				8,680 hours	\$836,144
7. ANNUAL TOTALS per year⁷				2,893 hours	\$278,715

Notes:

1. **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 14.1 in Appendix 2**.
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, please see **Tables 14.2 and 14.3 in Appendix 2**.
3. **Column 3** = Expected number of responses for the three years, based on reporting framework outlined in each Grantee's signed Terms and Conditions.
4. **Column 4** = Total burden hours, calculated by multiplying the burden hours per response (Column 1) by the number of responses (Column 3).
5. **Column 5** = Total labor cost, calculated by multiplying the loaded weighted labor cost per response (Column 2) by the number of responses (Column 3).
6. **Row 6 = Totals for all three years** = Sum of total hours and costs, for all instruments.
7. **Row 7 = Annualized totals per year** = Average number of hours and costs per year, for all instruments.

14c. Agency Non-Labor Costs

There are no expected operational costs unique to this information collection, as EPA Project Officers 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.

Not applicable: This is a new collection, and so does not involve any program changes or burden adjustments.

16. PUBLICATION OF DATA

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

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. EPA will submit additional ICR packages to seek authorization for program evaluation studies that involve additional collections of information beyond those outlined in this ICR.

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. 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 base 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—including quantitative metrics, success stories, and photographs submitted by Grantees—will be publicly reported in four ways:

- a) EPA will post aggregated summaries of the Grantees' 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 Act (GPRA) 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 from the Executive and Legislative branches.

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 (e.g., progress reports) and the methodology used to collect the information (e.g., self-report).

Collection, Tabulation, and Public Reporting of Information

- Semi-annually: Grantees submit progress reports to EPA.
EPA publishes information and images on EPA public website.
- Annually: EPA summarizes aggregated information in reports to OMB (e.g., budget data requests, Annual Performance Reports).
- Periodically: EPA summarizes aggregated information to respond to requests for data and information from the Congressional and/or Executive Branch.
- End of Award: Grantees submit final reports to EPA.
EPA reviews information for each grantee to assess individual progress.
EPA aggregates and reviews information across grantees to identify themes.

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.

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.”

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

Appendix 1

Calculations for Section 12: Respondent Burden Hours & Costs

Step 1: Calculate proportion of respondent burden hours across all staff roles at relevant levels of seniority.

TABLE 12.1: PROPORTION of Respondent Hours			
Number of Hours: Management	Number of Hours: Technical	Number of Hours: Clerical/Support	Total Proportion
0.15	0.7	0.15	1

Step 2: Calculate weighted labor cost across all staff roles involved.

TABLE 12.2: WAGE RATES for Respondents (2023\$)								
Labor Category	Data Series ^a	Period	Wage (\$/hour)	Fringe Benefit ^b	Total Compensation	Overhead as % of Total Compensation ^c	Overhead	Hourly Loaded Wages
			(a)	(b)	(c) = (b)+(a)	(d)	(e) = (c) * (d)	(f) = (c) + (e)
Managerial	BLS OEWS, National Industry-Specific Estimates, 813400, General and Operations Managers	May/June 2023	\$48.77	33.8%	\$65.27	20%	\$13.05	\$78.33
Professional / Technical	BLS OEWS, National Industry-Specific Estimates, 813400, Social Scientists and Related Workers	May/June 2023	\$36.00	\$12.18	\$48.18	20%	\$9.64	\$57.82
Production Worker /	BLS OEWS, National Industry-Specific Estimates,	May/June 2023	\$21.05	\$7.12	\$28.17	20%	\$5.63	\$33.81

TABLE 12.2: WAGE RATES for Respondents (2023\$)								
Labor Category	Data Series ^a	Period	Wage (\$/hour)	Fringe Benefit ^b	Total Compensation	Overhead as % of Total Compensation ^c	Overhead	Hourly Loaded Wages
			(a)	(b)	(c) =(b)+(a)	(d)	(e)=(c) * (d)	(f)=(c)+(e)
Clerical	813400, Secretaries and Administrative Assistants							
Footnotes ^a Source of wage: U.S. Bureau of Labor Statistics. Occupational Employment and Wage Statistics. May 2023 National Industry-Specific Occupational Employment and Wage Estimates NAICS 813400 - Civic and Social Organizations. (https://www.bls.gov/oes/current/naics4_813400.htm#21-0000) ^b Fringe is calculated using total benefits as a percent of wage. Source: U.S. Bureau of Labor Statistics. Employer Costs for Employee Compensation. Table 4. Private industry workers by occupational and industry group. June 2023. Other Services Industry. (https://www.bls.gov/news.release/archives/ecec_09122023.pdf) ^c An overhead rate of 20% is used based on assumptions in EPA's Handbook on Valuing Changes in Time Use Induced by Regulatory Requirements and Other U.S. EPA Actions								

TABLE 12.3: WEIGHTED LABOR COSTS for Respondents	
Weighted Hourly Labor Cost	Explanation of Calculations
\$57.29	Weighted Hourly Labor Cost = (Wage rate * proportion of hours) calculated for each respondent group (management, technical, clerical/support) and summed. Wages are rounded to nearest cent in analysis.

Total burden calculations (hours and costs) are shown in Section 12.

Appendix 2

Calculations for Section 14: Agency Hours & Costs

Step 1: Calculate proportion of respondent burden hours across all staff roles at relevant levels of seniority.

TABLE 14.1: PROPORTION OF Agency Hours			
Number of Hours: Management (GS-15, Step 1)	Number of Hours: Program Lead (GS-14, Step 1)	Number of Hours: Project Officer (GS-11, Step 1)	Total Proportion
0.10	0.20	0.70	1

Step 2: Calculate weighted loaded labor cost across all staff roles involved.

TABLE 14.2: LOADED WAGE RATES for Agency Staff (2023\$)								
Labor Category	Data Series ^a	Period	Wage (\$/hour)	Fringe Benefit ^b	Total Compensation	Overhead as % of Total Compensation ^c	Overhead	Hourly Loaded Wages
			(a)	(b)	(c) =(b)+(a)	(d)	(e)=(c) * (d)	(f)=(c)+(e)
EPA staff - Management	Annual federal staff cost: OPM Washington-Baltimore-Northern Virginia, DC-MD-PA-VA-WV area, GS-15 Step 1 pay rates ^a	2023	\$78.56	\$50.20	\$128.76	20%	\$25.75	\$154.51
EPA staff - Program Lead	Annual federal staff cost: OPM Washington-Baltimore-Northern Virginia, DC-MD-PA-VA-WV area, GS-14 Step 1 pay	2023	\$66.79	\$42.68	\$109.47	20%	\$21.89	\$131.36

TABLE 14.2: LOADED WAGE RATES for Agency Staff (2023\$)								
Labor Category	Data Series ^a	Period	Wage (\$/hour)	Fringe Benefit ^b	Total Compensation	Overhead as % of Total Compensation ^c	Overhead	Hourly Loaded Wages
			(a)	(b)	(c) =(b)+(a)	(d)	(e)=(c) *(d)	(f)=(c)+(e)
	rates ^a							
EPA staff - Project Officer	Annual federal staff cost: OPM Washington-Baltimore-Northern Virginia, DC-MD-PA-VA-WV area, GS-11 Step 1 pay rates ^a	2023	\$39.66	\$25.34	\$65.00	20%	\$13.00	\$78.00

Footnotes
^a Source of wage: Source: U.S. Office of Personnel Management. (2023). Salary Table 2023-DCB. (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/DCB_h.pdf).
^b Fringe is calculated using total benefits as a percent of wage. A percentage of 63.9% is used based on: Falk, J. 2012. "Comparing Benefits and Total Compensation in the Federal Government and the Private Sector." Congressional Budget Office Working Paper Series.
^c An overhead rate of 20% is used based on assumptions in EPA's Handbook on Valuing Changes in Time Use Induced by Regulatory Requirements and Other U.S. EPA Actions.

TABLE 14.3: WEIGHTED LOADED LABOR COSTS for Agency Staff	
Weighted Loaded Hourly Labor Cost	Explanation of Calculations
\$96.33	Weighted Hourly Labor Cost = (Wage rate * proportion of hours) calculated for each respondent group (Management, Program Lead, Project Officer) and summed. Wages are rounded to nearest cent in analysis.

Total burden calculations (hours and costs) are shown in Section 14.