

**ATTACHMENT N**

Detailed Burden and Cost Calculations

**Wage Rates**

**Respondents**

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

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

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

**Agency**

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

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

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

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

**Respondents**

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

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

\*\*This column reports the number of annual respondents after accounting for the partnership renewal process. Assumes that one in ten formulators over the three-year period will need to make changes to their formulations and go through a new partnership process which includes same collection steps. On an annual basis, this translates to 4 product formulators (for a total of 44 partnership agreements). Also assumes that about 33% of the remaining product formulators will be

subject to site audits each year (i.e., 12) and that about 66% (i.e., 24) will be subject to desk audits each year. Assumes that 77 partners will fill out Private Label submissions based on historical data.

**Agency**

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

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

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

**Respondents**

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

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

**Agency**

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

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

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

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

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

**Respondents**

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

Complete and submit package		0	10	1	0	20	2	22	\$1,722
<b>Subtotal</b>	<b>2</b>	<b>1</b>	<b>12</b>	<b>2</b>	<b>2</b>	<b>24</b>	<b>4</b>	<b>30</b>	<b>\$2,318</b>
<b>TOTAL</b>	<b>35</b>							<b>525</b>	<b>\$40,565</b>

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

**Agency**

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

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

**Respondents**

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

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

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

**Agency**

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

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



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

**Respondents**

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

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

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

**Agency**

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

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