

U.S. Environmental Protection Agency

Information Collection Request

Title: This ICR is entitled “EPA’s ENERGY STAR® Product Labeling.” (EPA ICR No. 2078.09, OMB Control Number 2060-0528)

OMB Control Number: 2060-0528

EPA ICR Number: 2078.09

Abstract:

Section 324 of the Energy Policy and Conservation Act directs the Environmental Protection Agency and the Department of Energy[1] to implement “a voluntary program to identify and promote energy-efficient products and buildings in order to reduce energy consumption, improve energy security, and reduce pollution through voluntary labeling of or other forms of communication about products and buildings that meet the highest energy efficiency standards.” Operating under this authority, EPA’s ENERGY STAR program is a voluntary public/private partnership program that creates self-sustaining markets for energy efficient products. The centerpiece of the program is the ENERGY STAR label, a registered certification label that helps consumers identify products that save energy, save money, and help protect the environment without sacrificing quality or performance. In order to protect the integrity of the label and enhance its effectiveness in the marketplace, EPA must ensure that products carrying the label meet appropriate program requirements.

EPA partners with retailers, energy efficiency program sponsors (EEPS), and product brand owners who wish to use the ENERGY STAR label to differentiate products as more energy efficient. Retailers, EEPS, and product brand owners sign and submit a Partnership Agreement Form and Participation Form to indicate that they voluntarily agree to fulfill the relevant program requirements. These forms are collectively referenced in this ICR as a Partnership Application (PA).[2] Products that are labeled as ENERGY STAR by product brand owner partners undergo third-party certification. EEPS Partners agree to promote energy efficiency as an easy and desirable option for organizations and consumers to prevent pollution, protect the global environment, and save on energy bills. Retail partners sell, market, and promote ENERGY STAR certified products.

Prior to labeling a product as ENERGY STAR, partners have eligible products tested in an EPA-recognized laboratory and certified by an EPA-recognized third-party certification body (CB). To minimize the burden on Partners, EPA maintains an automated data exchange with CBs. The CBs share information with EPA on products they review from EPA-recognized laboratories during the certification process. The XML-based data exchange allows the CBs to automatically transmit information on certified products to EPA from their database via web services. This automated system eliminates the need for paper submissions. EPA runs a series of automated validations to ensure the integrity of the data and confirm the credentials of the organizations associated with the data prior to incorporating it into the ENERGY STAR product database. EPA then provides the relevant information to consumers and purchasers in user-friendly formats that facilitate the purchase of energy efficient products.

The certification process also includes requirements for CBs to report to EPA products that were reviewed, but not eligible for certification, as well as to conduct post-market verification testing of a sampling of ENERGY STAR certified products. CBs complete a minimum amount of verification testing and share information with EPA on products verified twice a year. CBs report to EPA any post-market

test data indicating a product may no longer meet the program requirements. This process helps maintain consumer confidence in the ENERGY STAR label and protect the investment of Partners.

While most product-related information is provided by CBs, Partners are asked to submit to EPA annual unit shipment data for their ENERGY STAR certified products. EPA is flexible as to the methods Partners may use to submit unit shipment data. For example, if Partners already submit this type of information to a third party, such as a trade association, they are given the option of arranging for shipment data to be sent to EPA via this third party to avoid duplication of efforts and to ensure confidentiality. In addition to unit shipment data, EPA also periodically collects data not already listed in a public federal registry on products to inform criteria for product specifications.

Finally, Partners that wish to receive recognition for their efforts in ENERGY STAR may submit an application for the Partner of the Year Award. Partners that have ENERGY STAR certified central air conditioners, air-source heat pumps, furnaces, geothermal heat pumps, and windows that meet the ENERGY STAR Most Efficient criteria may submit an application to gain ENERGY STAR Most Efficient recognition.

Today, nearly 90% of the American public recognizes the ENERGY STAR label. Thus, even though participation in the ENERGY STAR program is voluntary, most producers seek to satisfy its criteria. Currently ENERGY STAR has approximately 1,500 manufacturing Partners covering more than 45,000 certified product models in more than 65 product categories. Partners see the ENERGY STAR label as a useful and effective marketing tool for highlighting the energy efficiency of their products to consumers and others. In addition, ENERGY STAR provides Partners with recognition as environmental leaders. More than 840 utilities, state and local governments, and nonprofits leverage ENERGY STAR in their efficiency programs, reaching roughly 97% of households in all 50 states.

^[1] Under the terms of an interagency Memorandum of Understanding, EPA is responsible for implementing the ENERGY STAR Program with technical support from DOE.

^[2] The term, Partnership Application, is used to collectively refer to the Partnership Agreement Form and the Participation Form throughout the ICR; however, it is not a term used by the Labeled Products program.

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.

Section 103(g) of the Clean Air Act directs EPA to "develop, evaluate, and demonstrate nonregulatory strategies and technologies for air pollution prevention... with opportunities for participation by [stakeholders]... including SO_x, NO_x... CO₂... including end-use efficiency, and fuel-switching to cleaner fuels." ([42 USC Section 7403g](#))

In 2005, Congress enacted the Energy Policy Act. Section 131 of the Act amends Section 324 of the Energy Policy and Conservation Act, and directed the Environmental Protection Agency and the Department of Energy to implement "a voluntary program to identify and promote energy-efficient products and buildings in order to reduce energy consumption, improve energy security, and reduce pollution through voluntary labeling of or other forms of communication about products and buildings that meet the highest energy efficiency standards." The Act further directs EPA and DOE to "(1) promote ENERGY STAR compliant technologies as the preferred technologies in the marketplace for (A) achieving energy efficiency; (B) and reducing pollution; (2) work to enhance public awareness of the ENERGY STAR label, including providing special outreach to small businesses; (3) preserve the integrity of the ENERGY STAR label; (4) regularly update Energy Star product criteria for product categories;" and to solicit comments from interested parties prior to establishing/revising ENERGY STAR product categories, specifications, or criterion. ([42 USC Section 6294a](#))

Collecting information from ENERGY STAR Partners and their representatives is necessary to achieve this mandate and document results.

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 uses information from organizations joining the program to ascertain basic identification information about them and verify their commitment to the program. EPA may also use partnership information for program implementation purposes, such as maintaining up-to-date listings of products and services available to the public. Further, ENERGY STAR's tools (e.g., Product Finder, EPA-Recognized Bodies Search Tool, Rebate Finder) are available online for the public to find and compare ENERGY STAR certified product performance, third-party EPA-recognized bodies, and rebate offerings. Finally, EPA uses certified product data primarily to document and inform consumers about which products qualify for the ENERGY STAR label, fulfilling a fundamental purpose of the program – making it easy for consumers to identify and choose energy efficient products that are good for the environment. This data also informs the process by which ENERGY STAR performance specifications are established and revised, and factors into EPA's assessment of whether and how the ENERGY STAR label can continue to effectively differentiate efficient products in the market. EPA and others use this information to evaluate ENERGY STAR and ensure continued success and benefits to Partners. EPA recognition enhances the image of organizations as national leaders in energy performance.

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 collected under this ICR will primarily use email and web-based tools. EPA ENERGY STAR's tools continue to minimize burden for its users and EPA continuously assesses the opportunities to further reduce burden. For example, EPA created a new web-based tool for Energy Efficiency Program Sponsors (EEPS) partners to self-manage and update their incentive offering listed on the EPA website.

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.

The information collected under this ICR is not collected by any other organization. In addition, the information collected is based on a particular point in time; therefore, information that is not up-to-date is not sufficient. EPA ensures that the information collected will not duplicate any ongoing recordkeeping or reporting functions requested under other Agency programs. For example, Energy Efficiency Program Sponsors (EEPS) can participate in one or more ENERGY STAR programs (e.g., Products, C&I). EPA designed its Partnership Agreement to enable an EEPS to complete and submit it once and select the specific program(s) it wants to partner with, rather than submitting it to each program separately.

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 expects that small entities will participate in ENERGY STAR product labeling. EPA has designed information requirements to minimize respondent burden while obtaining sufficient and accurate information. Under EPA's ENERGY STAR product certification process, EPA gives organizations the flexibility to use their own in-house laboratory for testing or contract with an independent laboratory. EPA believes this ensures small businesses have plenty of options when searching for a third-party entity to conduct testing and certification of their products. Third-party certification bodies and laboratories submit certifications directly to EPA, reducing the burden on brand owner partners from needing to submit certification information.

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 has carefully considered the information collection burden under the ENERGY STAR program. EPA is confident that those activities requested of respondents are necessary, and to the extent possible, the Agency has minimized the burden. A number of the requested activities, for example, will be performed once (e.g., one-time submittal of a Partnership Application). In addition, respondents can satisfy many of

the collections in this ICR by submitting readily available information. For example, brand owner partners submit Unit Shipment Data on an annual basis in order to monitor and evaluate the program annually to ensure continued program success and benefits to Partners. EPA believes strongly that, if the information collections in this ICR are not performed at the requested frequency, EPA's ability to implement the ENERGY STAR program and the public's ability to benefit from the program's tools and resources could be hampered significantly.

7. GENERAL GUIDELINES

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

With the following exception, information collections performed under this clearance will follow all of OMB's General Guidelines regarding federal data collection.

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.

In compliance with the Paperwork Reduction Act, EPA solicited public comments on this ICR through an announcement in the Federal Register on August 1, 2025 (90 FR 36159) and received six comments from nine commenters. Most commenters expressed strong support for the ENERGY STAR program's environmental and consumer benefits, noting that it was necessary for the program to collect information and that the proposed information collection request has not been overly burdensome. One commenter encourages EPA to consider simplifications for small businesses through easier forms or digital tools. Another anonymous commenter listed several suggestions related to program integrity and data fields for product submissions which are already covered by the program. Generally, commenters supported EPA's continued collection of product information and acknowledged the value of the collected data for the program. The National Electrical Manufacturers Association (NEMA), the Air-Conditioning, Heating & Refrigeration Institute (AHRI), the Association of Home Appliance Manufacturers (AHAM), the Consumer Technology Association (CTA), and the Information Technology Industry Council (ITI) filed joint comments supporting the continuation of the ICR and the ENERGY STAR program. These joint commenters affirmed that the program's reporting and recordkeeping requirements are reasonable and "has not been overly burdensome," and they highlighted ENERGY STAR as a successful voluntary public-private partnership that delivers significant energy and cost savings.

In response to these comments, specifically on reporting cost and hour burden, EPA notes that its digital data systems (including the XML-based Qualified Product Exchange (QPX) for automated transmission of certified product data) and flexible options for annually submitting unit shipment data are designed to streamline reporting and avoid duplicative effort. EPA further affirms that the information collection activities required under this ICR are necessary to maintain the credibility and effectiveness of the ENERGY STAR label.

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.

In August 2025, EPA contacted six individuals in Partner organizations to request their input on the ICR's burden estimates. The purpose of the consultations was to determine if the burden estimates (e.g., EPA recognition applications) should be updated or revised in preparing ICR 2078.09. The table identifies the points of contact (POCs) and their organizations. EPA selected these organizations because of their substantial experience in carrying out collections under the ENERGY STAR program. Generally, the estimates provided by the Partners were consistent with EPA expectations of the labor burden. EPA took consultation results into consideration when compared to previous estimates. In some cases, EPA determined the differences between existing estimates and partner responses were not significant enough to warrant a change in burden estimates.

POC Name	Organization Name	Phone Number	Email
Michele Linton	SoftLite Windows	(330) 528-4033	Michele.Linton@cornerstone-bb.com
Cristal Figueroa	Intertek Testing Services, NA	(312) 906-7784	Cristal.figueroa@intertek.com
Kristin Davis	UL LLC	(847) 664-2670	Kristin.p.davis@ul.com
John Sena	CSA Group	(216) 524-4990	John.sena@csagroup.com
Carolyn Beebe	Snohomish PUD	(425) 783-1720	chbeebe@snopud.com
Lisa Scott	Ecobee Energy	(437) 757-6543	Lisa.scott@ecobee.com
Casey Murphy	Pearl	(240) 375-2311	casey@pearlcertification.com

Following is a summary of EPA's questions, Partners' comments and EPA's responses (e.g., if and how the Agency incorporated the comments into ICR 2078.09):

Joining the ENERGY STAR program and Related Activities:

EPA provided two Partners with the ICR's burden estimates for completing a Product Brand Owner Partnership Application and asked if they were reasonable. EPA provided two recognized certification/lab organization with the ICR burden estimates for completing an Application for Lab Recognition, Application for Lab Scope Expansion, Application for Witnessed/Supervised Manufacturing Testing Laboratories (W/SMTL) Recognition, Application for CB Recognition, and Application for CB Scope Expansion and asked if they were reasonable. The Partners and CB/labs discussed their experiences conducting these activities and indicated that the estimates were reasonable. EPA did not revise its estimates. The Partners indicated that no capital or operations and maintenance costs were involved with these activities because the materials were downloaded, completed online, and submitted to EPA via email.

Partner Maintenance Activities:

EPA provided six Partners with the ICR's burden estimates for third-party certified product information activities and asked if they were reasonable. The third-party certified product information activities included submitting certified model data, submitting verification testing data, and submitting testing failure information. EPA provided two Partners with the ICR's burden estimates for Unit Shipment Data. The Partners discussed their experiences conducting these activities and indicated that the burden estimates were reasonable. EPA did not revise its estimates. The Home Upgrade Service Provider Partner Form is a new form. EPA provided a Service Provider Partner with the form and asked that they provide burden estimates. The Smart Thermostat Certification and Statistics form is a new form. EPA provided a Smart Thermostat manufacturer with the form and asked them to provide burden estimates. The Partners indicated that no capital or operations and maintenance costs are involved with these activities because the materials are downloaded, completed online, and submitted to EPA via email or via EPA's XML-based qualified product exchange (QPX) system for certification bodies (CBs) to submit information on products certified as ENERGY STAR via web services.¹

POY Recognition:

EPA provided two Partners with the ICR's burden estimates for the POY Application and asked if they were reasonable. The Partners discussed their experience conducting the activities and one Partner indicated that the burden estimates were reasonable. The other Partner indicated the burden was half of the estimate. The EPA revised its estimate. The Partners indicated that no capital or operations and maintenance costs are involved with these activities because the materials are downloaded, completed online, and submitted to EPA via email or EPA's XML-based qualified product exchange (QPX) system <https://energystar-mesa.force.com/MesaLogin>.

9. PAYMENTS OR GIFTS TO RESPONDENTS

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

¹ Data submitted through these web services are validated against the XML standard. Communication between web services is conducted using a SOAP-based API defined in the Web-Service Definition Language (WSDL). A further description of this service is provided here:

https://www.energystar.gov/partner_resources/products_partner_resources/third_party_cert/cbs/xml_submission

No payments or gifts are granted to respondents.

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.

Participation in the ENERGY STAR program is voluntary and may be terminated by participants or EPA at any time. If a claim of confidential business information (CBI) is asserted, EPA will manage that information in accordance with EPA's provisions on confidentiality. 40 CFR Part 2, Subpart B establishes EPA's general policy on the public disclosure of information and procedures for handling CBI claims.

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 of a sensitive nature are asked of participants under the ENERGY STAR program.

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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EPA conducted consultations with ENERGY STAR Partners to estimate respondent burden hours for the activities covered by this ICR. The responses EPA received were averaged to estimate the hourly burden for each activity. Joining the ENERGY STAR Program and Related Activities (Exhibit 1 presents the estimated annual respondent burden for information collection activities associated with ENERGY STAR product labeling.

12a. Respondents/NAICS Codes

Respondents for this information collection request include ENERGY STAR Partners, who are product manufacturers. The following list of North American Industry Classification System (NAICS) codes

includes but is not limited to industry segments which may be potential respondents to the information collections.²

NAICS	Industries
221111	Hydroelectric Power Generation
313320	Fabric Coating Mills
322211	Corrugated and Solid Fiber Box Manufacturing
323113	Commercial Screen Printing
324122	Asphalt Shingle and Coating Materials Manufacturing
325992	Photographic Film, Paper, Plate, and Chemical Manufacturing
327123	Other Structural Clay Product Manufacturing
327211	Flat Glass Manufacturing
327993	Mineral Wool Manufacturing
332321	Metal Window and Door Manufacturing
333298	All Other Industrial Machinery Manufacturing
333311	Automatic Vending Machine Manufacturing
333313	Office Machinery Manufacturing
333319	Other Commercial and Service Industry Machinery Manufacturing
333414	Heating Equipment (except Warm Air Furnaces) Manufacturing
333415	Air-Conditioning and Warm Air Heating Equipment and Commercial and Industrial Refrigeration Equipment Manufacturing
334113	Computer Terminal Manufacturing
334119	Other Computer Peripheral Equipment Manufacturing
334210	Telephone Apparatus Manufacturing
334220	Radio and Television Broadcasting and Wireless Communications Equipment Manufacturing
334310	Audio and Video Equipment Manufacturing
334512	Automatic Environmental Control Manufacturing for Residential, Commercial, and Appliance Use
335110	Electric Lamp Bulb and Part Manufacturing
335121	Residential Electric Lighting Fixture Manufacturing
335129	Other Lighting Equipment Manufacturing
335222	Household Refrigerator and Home Freezer Manufacturing
335224	Household Laundry Equipment Manufacturing
423440	Other Commercial Equipment Merchant Wholesalers
423740	Refrigeration Equipment and Supplies Merchant Wholesalers
441310	Automotive Parts and Accessories Stores
443111	Household Appliance Stores
443120	Computer and Software Stores
444110	Home Centers
493120	Refrigerated Warehousing and Storage
541380	Testing Laboratories

12b. Information Requested

This section outlines the information collections under this ICR, including data items and respondent activities for various ENERGY STAR program processes. For the Partnership Application (PA), partners must provide basic company and contact information and submit the application along with a joint

²U.S. Census Bureau. *North American Industry Classification System*. Accessed on August 26, 2025 <https://www.census.gov/naics/?58967?yearbck=2022>.

statement on brand ownership and license agreements where applicable. For AB, CB, Lab, and W/SMTL Recognition, organizations must submit application data and supporting documents for recognition or scope expansion. Certified Product Maintenance involves submitting product details and certification data to support product listings and product specification updates, while Partner Response Forms (PRFs) track product issues and certification errors. Unit Shipment Data forms are used by partners to report the number of ENERGY STAR units shipped annually. The smart thermostat data form is submitted twice a year and is used to confirm product performance. The ENERGY STAR Home Upgrade project data is submitted annually to demonstrate partner activity. The EEPS incentive data collection allows EEPS partners to provide incentive data per product category, per service territory that can be displayed on the ENERGY STAR website. The Partner of the Year (POY) applications require data on achievements, product performance, and energy savings efforts. In all cases, respondents are responsible for completing forms, reviewing information, and submitting relevant documents.

12c. Respondent Activities

This section describes, in detail, the information collections under this ICR, including data items and respondent activities.

Joining the ENERGY STAR Program and Related Activities

Partnership Application (PA)

Data Item

- Partner name
- Programs for which they are partnering with EPA (participation form)
- Information on main contact person
- Information on marketing/PR contact person
- Signature of company official
- Information on brand involved in license agreement, if applicable
- Information on expiration date of license agreement, if applicable
- Information on main contact person at each organization, if applicable
- Signatures of company officials, if applicable

Recordkeeping Item

- There are no recordkeeping data items required pertaining to the Partnership Application.

Respondent Activity

- Review the instructions of the PA
- Complete and review the information requested by the PA
- Submit the PA
- Submit the joint statement between the brand owner and licensee, if applicable

Application for AB, CB, Lab, and W/SMTL Recognition and Scope Expansion

Data Item

- Organization's name
- Organization's address
- Contact name, address, email, phone
- Preparer's name, title, date

- Programs (product categories) for which they are partnering with EPA
- Organization's relevant reference documents

Recordkeeping Items

- The Accreditation Body maintains a record of quality management documentation as required by ISO 17011.
- The Laboratory maintains a record of their accreditation certificate and scope of accreditation.
- The Certification Body maintains a record of their accreditation certificate and scope of accreditation.

Respondent Activity

- Review the instructions
- Complete and review application
- Submit the application

Partner Maintenance Activities

Third-Party Certified Product Information

Data Item

- Company Name
- Product Name and model number
- Product energy consumption attributes
- Other key product specific information according to the relevant ENERGY STAR product Eligibility Requirements
- Certified laboratories and certification bodies associated with the product.

Recordkeeping Items

- The Certification Body maintains a certification record, and test reports on file for all products that undergo certification testing.

Respondent Activity

- Organize certified model data into format for automated submission
- Submit summary of verification testing data
- Submit testing failure information
- Submit information on ineligible products

Partner Response Forms (PRFs)

Data Item

- Company name and contact information
- Case number
- Product brand name and model number
- OEM name and contact information
- Notification date
- Manufactured dates and sales information
- Downstream distribution chain information
- Additional affected model numbers and sales information
- Representative signature

Recordkeeping Items

- There are no recordkeeping data items required pertaining to Partner Response Forms.

Respondent Activity

- Complete and submit “Disputable” version of the PRF
- Complete and submit “Non-disputable” version of the PRF
- Complete and submit Certification Error PRF

Unit Shipment Data

Data Item

- Number of ENERGY STAR certified units shipped that year by product sub-type
- Total U.S. shipments that year (requested but not required)

Recordkeeping item

- There are no recordkeeping data items required pertaining to Unit Shipment Data.

Respondent Activity

- Review instructions regarding Unit Shipment Data
- Gather annual Unit Shipment Data
- Compile and review USD by ENERGY STAR product category
- Submit Unit Shipment Data form

Smart Thermostat Certification and Statistics Form

Data Item

- Product Characteristics
- Climate Zone
- Product energy consumption attributes
- Energy results and statistical findings

Recordkeeping item

- The manufacturer is to retain the raw data files, metadata files, connected thermostat data set files, and the output file for a period of five years.

Respondent Activity

- Review instructions regarding Smart Thermostat Certification and Statistics Form
- Gather bi-annual data
- Run data through the ENERGY STAR provided software and review data
- Submit Smart Thermostat Certification and Statistics Form

Home Upgrade Service Provider Partner Form

Data Item

- Organization’s name
- Organization’s address
- Contact name, address, email, phone
- Preparer’s name, title, date
- Organization’s relevant reference documents

Recordkeeping item

- The Service Provider Partner provides data on projects installed throughout the year. This data is submitted to EPA on an annual basis.

Respondent Activity

- Review instructions regarding Home Upgrade Service Provider Partner Form
- Gather annual data
- Compile and review data
- Submit Home Upgrade Service Provider Partner Form

Partner of the year (POY) Recognition

Partner of the Year

Data Item

- Name of the organization
- Name of the organization as it should appear on the award
- Information on the primary contact person
- Information on the communications contact
- Information on the organization CEO
- Information on the organization headquarters
- Information on the award category
- Information on the number of products labeled, number of ENERGY STAR certified homes built, benchmarks reached or surpassed in energy management, benchmarks reached or surpassed in EE program delivery
- Information on training, communication and outreach efforts
- Information on other special endeavors or services provided

Recordkeeping Item

- There are no recordkeeping data items required pertaining to Partner of the Year award applications.

Respondent Activity

- Review the eligibility requirements and instructions on the application
- Gather data
- Complete and review the information and narrative descriptions
- Submit the application
- Submit original examples of communication materials

12d. Respondent Burden Hours and Labor Costs

Joining the ENERGY STAR Program and Related Activities (Exhibit 1) presents the estimated annual respondent costs for information collection activities associated with ENERGY STAR product labeling. The estimated annual respondent costs are discussed below.

In this section, EPA describes its estimates of the number of respondents carrying out the information collections under the ENERGY STAR product labeling program. In developing its estimates, EPA referred to its databases and other documentation in order to understand historical trends in the number of new

and existing respondents. While number of respondents will vary from year to year, based on these resources, EPA has estimated the average annual number of respondents associated with each of the information collections under the program.

In total, EPA estimates there are approximately 3,877 respondent activities under the ENERGY STAR products labeling program annually. In deriving this estimate, EPA referred to its databases to determine the current number of respondent Partners, including Product Brand Owners, Retailers, EEPS³, ABs, CBs, and Labs. EPA notes that most respondents in this ICR are current Partners. EPA next identified the number of new organizations expected to join the program each year for the next three years, based on historical trends over the last three years.

These organizations are discussed further below.

EPA estimates an average hourly respondent labor cost (\$2025) of \$145.58/hr for legal staff, \$106.05/hr for managerial staff, \$57.71/hr for technical staff, and \$37.95/hr for clerical staff. To derive these hourly estimates, EPA referred to the May 2024 National Occupational Employment and Wage Estimates published by the U.S. Bureau of Labor Statistics.⁴ This publication summarizes the unloaded (base) hourly rate for major occupational groups.⁵ EPA then applied the standard government overhead factor of 1.6 to the unloaded rate to derive loaded hourly rates. Finally, EPA updated the loaded hourly rates to June 2025 levels using Employment Cost Indexes developed by the U.S. Bureau of Labor Statistics.⁶

JOINING THE ENERGY STAR PROGRAM AND Related Activities (Exhibit 1)

Partnership Application

EPA has developed a Partnership Application process for product brand owners, retailers, and EEPS wishing to join the ENERGY STAR product labeling program, which consists of a partnership agreement form and a participation form. It is expected that 278 new brand owner, retailers, and EEPS Partners will join each year for the three years of this ICR, as reflected in Joining the ENERGY STAR Program and Related Activities (Exhibit 1).⁷

Partnership Type	Number of Annual Respondents
Product Brand Owner	254

³ The total number of EEPS with ENERGY STAR Partner Accounts is distinct from the number of EEPS Partners actively responding to information collection requests. EPA estimates that around 83 EEPS Partners respond to this information collection request each year.

⁴ U.S. Bureau of Labor Statistics (BLS), Occupational Employment Statistics (OES), *May 2024 National Occupational Employment and Wage Estimates*. Available online at <https://data.bls.gov/oes/#/industry/000000>.

⁵ For purposes of this analysis, the following occupational groups of the U.S. Bureau of Labor Statistics (BLS) were used: legal staff, SOC 23-1011, Lawyers; managerial staff, BLS SOC Code 11-1021, General and Operations Managers; technical staff, BLS SOC Code 17-3027, Mechanical Engineering Technicians; and clerical staff, BLS SOC Code 43-6014, Secretaries and Administrative Assistants, Except Legal, Medical, and Executive.

⁶ Bureau of Labor Statistics; "Table 1. Employment Cost Index for total compensation, by occupational group and industry;" Employment Cost Index, June 2024 (December 2005=100); June 2025. Available at <https://www.bls.gov/web/eci/echistrynaics.pdf>. Civilian Workers, All Workers, June 2024=165.50 and June 2025=171.395.

⁷ This ICR estimates the burden for EEPS Partnership Applications across all ENERGY STAR programs (e.g., Products, C&I). All EEPS complete and submit the same Partnership Application to EPA.

Retailer	8
EEPS	16
Total	278

Application for AB, CB, and Lab Recognition and Scope Expansion

EPA estimates that it will receive 38 applications for lab recognition, 110 applications for lab scope expansion, and 24 applications for W/SMTL recognition each year.

Further, the number of Accreditation Bodies and Certification Bodies has changed minimally over the last three years because most interested stakeholders are already participants. EPA estimates that it will receive 1 application from an AB over the next three years, and 2 applications from CBs each year over the next three years. Because this ICR estimates annual burden over a 3-year period, EPA has annualized the one AB application over three years, to estimate that 0.33 applications will be received annually on average. EPA estimates that it will receive 4 applications for CB scope expansion each year.

Certified Product maintenance Activities (Exhibit 2)

Partnership Type	Number of Annual Respondents
Third Party Certified Product Information	40
Partner Response Forms	77
Unit Shipment Data for ENERGY STAR Partners	1,913
Home Upgrade Service Provider	36
Smart Thermostat	34
EEPS	1,245
Total	3,345

Third Party Certified Product Information

Product specifications for over 75 different products are developed and maintained by EPA under the ENERGY STAR product labeling program. Each product category has specific qualifying product information that must be reviewed, certified and shared by the CB. An average of 13,000 products are certified and labeled with the ENERGY STAR annually.

As reflected in Certified Product maintenance Activities (Exhibit 2, EPA estimates that 20 CBs will organize their certified model data into a format for automated submission. EPA updates the lists of certified models daily to reflect the most current information that has been transmitted to the EPA

database via web services. CBs conduct verification and challenge testing on an ongoing basis and verify a minimum sampling of products each year. Specifically, in 2024, 19 CBs submitted the summary of the testing they conducted for the year. In prior years, 19 CBs have submitted summary data, which supports the estimated number of entities EPA expects to report this information every year. On average CBs reported 70 product failures to EPA in the last three years. This number tends to fluctuate annually and could decrease in future years as product quality control increases. EPA estimates 20 partners will provide data for specification development efforts each year.

Partner Response Forms

Upon receipt of an official testing failure or delisted product letter from EPA, brand owner Partners complete and submit to EPA a Partner Response Form. There are several versions of this form (e.g., “Disputable” version, “Non-disputable” version). In total, EPA expects 77 Partner Response Forms to be submitted each year under this ICR.

Unit Shipment Data

Each year, ENERGY STAR Partners are asked to submit unit shipment data for their ENERGY STAR labeled products. Based on current partners across each product area, EPA estimates that it will receive 1,913 unit shipment reports each year. Unit shipment data will be aggregated for each of the product categories covered by EPA under ENERGY STAR.

Home Upgrade Service Provider Partner Form

As reflected in Certified Product maintenance Activities (Exhibit 2, EPA expects to receive 36 Home Upgrade Service Provider Partner Form applications annually.

Smart Thermostat Certification and Statistics Form

As part of the Smart Thermostat ENERGY STAR program partners are required to provide aggregate savings data and associated statistics to EPA every 6 months in accordance with the ENERGY STAR Method to Demonstrate Connected Thermostat Field Savings. This data is representative of the savings for the U.S. installed base and has to show continued compliance with the specification requirements. As there are 17 partners in the program, EPA collects 34 reports as part of this effort.

EEPS Incentive Data Collection

Energy efficiency program sponsors (EEPS) offer incentives to their customers on ENERGY STAR certified products and can voluntarily add them to ENERGY STAR online tools through an online form. EPA estimated the collection burden by asking a partner to use the online form and provide time estimates and share for task completion along with information about associated labor categories used. This information was combined with information on the number of partners that typically participate and an estimate of the number of incentives per partner to derive an estimate that 347 hours of burden are associated with 1,245 participant activities.

POY (Exhibit 3)

Partnership Type	Number of Annual Respondents
POY	82

Partner of the Year Application

As reflected in POY (Exhibit 3, EPA expects to receive 82 Products Partner of the Year Award applications annually.

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.

EPA does not expect Partners to incur capital or operations and maintenance costs to meet the information requests of ENERGY STAR because Partners conduct the activities online and work with their certification bodies submit the information via email or EPA's XML-based QPX system.

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

This section describes EPA's activities under ENERGY STAR.

Joining the ENERGY STAR Program and Related Activities

Partnership Application

EPA must perform the following activities related to the Partnership Application:

- Modify PA to be submitted by applicants
- Post the PA templates on the website
- Review the completed PA
- Send the joint statement template for the brand licensee and brand owner to sign, if a brand licensee is applying for partnership

- Enter the information contained in the PA into EPA database. (Include information from the joint statement, if applicable.)
- Send email welcoming them to the program

Application for AB, CB, Lab, and W/SMTL Recognition and Scope Expansion

EPA must perform the following activities related to recognition of these entities:

- Modify application to be submitted by AB/CB/Labs
- Disseminate via the internet
- Review the completed application
- Enter the information into EPA database

Certified Product maintenance Activities

Third-Party Certified Product Information

EPA must perform the following activities related to third-party certified product information:

- Maintain web services and incorporate model data from CBs into database
- Review and ensure accuracy of testing failure information
- Review and ensure accuracy of verification testing
- Review and ensure accuracy of verification testing summary report
- Maintain ineligible products list

Partner Response Forms:

EPA must perform the following activities related to Partner Response Forms:

- Review “Disputable” version of the PRF
- Review “Non-disputable” version of the PRF
- Review Certification Error PRF

Unit Shipment Data

EPA must perform the following activities related to Unit Shipment Data:

- Review Unit Shipment Data
- Compile information in aggregate form per product category
- Evaluate aggregate data to determine ENERGY STAR success and/or need for program adjustment

Partner of the Year (POY)

Partner of the Year Application

EPA must perform the following activities related to Partner of the Year application:

- Update the award criteria
- Post application on the website
- Review submitted awards applications
- Send a letter of award or loss

Connected Thermostats

EPA must perform the following activities related to the Connected Thermostat Data Collection:

- Collect the output file from the manufacturers.
- Analyze the data.
- Review that all manufacturers have submitted data and send reminders as needed.

14b. Agency Labor Cost

The hourly Agency labor rates used in this ICR were obtained from the 2025 Salary Tables for federal civilian employees, which are published by the Office of Personnel Management.⁸ EPA estimates an average hourly labor cost of \$95.94/hr for legal staff, \$89.71/hr for managerial staff, \$65.78/hr for technical staff, and \$26.42/hr for clerical staff. The labor costs are based on the following GS levels and steps: legal labor rates were based on GS Level 15, Step 1, managerial labor rates were based on GS Level 14, Step 4, technical labor rates were based on GS Level 12, Step 5, and clerical labor rates were based on GS Level 5, Step 1. To derive hourly estimates, EPA multiplied hourly rates by the standard government overhead factor of 1.6. Agency burden and costs are estimated in Table 1. The total Agency labor costs per year are \$620,968.46.

TABLE 1: AGENCY WAGE RATES

Factors	Legal ⁹	Managerial ⁹	Technical ⁹	Clerical ⁹
<u>Hourly Basic Rate by Grade & Step¹⁰</u>	\$59.96	\$56.07	\$41.11	\$16.51
Standard Government Overhead Factor	1.6	1.6	1.6	1.6
Hourly Rate	\$95.94	\$89.71	\$65.78	\$26.42

14c. Agency Non-Labor Costs

EPA anticipates one instance of Agency O&M costs associated with ENERGY STAR product labeling information collection activities. This corresponds to the cost of \$0.78 to mail a letter of congratulations to the executive management team of Partners who are awarded Sustained Excellence - Partner of the Year as part of the annual ENERGY STAR Awards.

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.

EPA estimates a total annual respondent burden in this ICR, 2078.09, of 44,110 hours. This is equivalent to the hours from the currently approved burden of 40,391 hours in ICR 2078.08.

⁸ See 2025 General Schedule (Base), "SALARY TABLE 2025-GS INCORPORATING THE 1.7% GENERAL SCHEDULE INCREASE EFFECTIVE JANUARY 2025," available at:

https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2025/GS_h.pdf

⁹ For purposes of this analysis, the following occupational groups of the U.S. Bureau of Labor Statistics (BLS) were used: Legal staff, SOC 23-1011, Lawyers; managerial staff, BLS SOC Code 11-1021, General and Operations Managers; technical staff, BLS SOC Code 17-3027, Mechanical Engineering Technicians; and clerical staff, BLS SOC Code 43-6014, Secretaries and Administrative Assistants, Except Legal, Medical, and Executive.

¹⁰ U.S. Office of Personnel Management. "Hourly Basic (B) Rates by Grade and Step, Hourly Title 5 Overtime (O) Rates for FLSA-Exempt Employees by Grade and Step;" SALARY TABLE 2025-GS, INCORPORATING THE 1.7% GENERAL SCHEDULE INCREASE, EFFECTIVE JANUARY 2025. 2025 General Schedule (GS) Locality Pay Tables.

Table 2 presents the total annual hours estimated in ICR 2078.08 and ICR 2078.09 for each information collection (see columns 1-3). The table then compares their respective hours for each collection to derive the change in hours, and indicates whether this hour-change resulted from a program change and/or adjustment (see column 4). The table also briefly describes the program change and/or adjustment (see column 5). Finally, the table sums up all hour-changes to derive the total annual change in hours for all collections (see the bottom row of the table).

As shown, there were hour changes due to adjustments and program changes.

TABLE 2: COMPARISON OF TOTAL ANNUAL RESPONDENT HOURS UNDER ICR 2078.08 AND ICR 2078.09

1. Information Collections	2. Annual Respondent Hour Burden in ICR 2078.08	3. Annual Respondent Hour Burden in ICR 2078.09	4. Difference in Hour Burden Between ICR 2078.08 and ICR2078.09			5. Description of Program Change and/or Adjustment
			Program Change ¹¹	Adjustment ¹²	Total	
Joining the ENERGY STAR Program and Related Activities						
Partnership Application	1,507	1,636	0	129	129	The slight increase in respondent burden resulted from the analysis for ICR 2078.08. This is due to the increase in brand owner partner applications over the past year. Based on consultations, the average hour per application decrease slightly; however the number of applications outweighed this change.
Application for AB, CB, and Lab Recognition and Scope Expansion	523	1,050	0	528	528	The change in respondent burden from the analysis for ICR 2078.08 was primarily based on an increase in lab applications and request for scope expansions over the past two years. Consultations indicated burden estimates per application required no changes
Partner Maintenance Activities						

¹¹ Program change is a substantive change to the program.

¹² Adjustment is an adjustment to the analysis such as increasing number of forms collected – analytical adjustment.

Third Party Certified Product Information	3,745	1,955	0	(1,789)	(1,789)	The change in respondent burden from the analysis for ICR 2078.08 was based on a significant decrease in testing failures linked to the sunset of the lamps and luminaires programs. There was no change in burden associated with other forms as program activity on certifications has remained consistent. Consultations indicated burden estimates per respondent are still representative of the program's activities.
Partner Response Forms	242	116	0	(126)	(126)	The decrease in respondent burden from the analysis for ICR 2078.08 was primarily from a removal of the CFL lamp dispute form, which is no longer relevant with the removal of lamps from the program. Consultations indicated burden estimates per respondent required no changes and are still representative of the industry burden.
Unit Shipment Data	30,205	33,458	0	3,253	3,253	The increase in respondent burden resulting from the analysis for ICR 2078.08 is based on an increase in the number of partners with certified models who are required to submit these forms. Consultations indicated burden estimates per respondent are still representative of the program's activities.
ENERGY STAR Home Upgrade Project Data		513	513	0	513	The ENERGY STAR Home Upgrade Service Provider program is new in this ICR 2078.08 analysis and is based on consultations with partners and the current number of partners required to submit this data.
Smart Thermostat Certification		619	619	0	619	This new respondent burden is from the expanding smart thermostat program that has

and Statistics Form						now met the threshold for inclusion in the analysis for ICR 2078.08 results. It is based on consultation for burden estimates per respondent and number of smart thermostat partners.
EEPS Incentive Data Collection		347	347	0	347	This new respondent burden captures the data that energy efficiency program sponsors provide to EPA for the rebate finder. EPA has made use of a new web-based tool that allows partners to provide data and self-manage incentives. Burden resulting from the analysis for ICR 2078.08 is based on consultations with partners using this new system and the number of new and updated incentives provided each year.
POY Recognition						
Partner of the Year	3,721	4,416	0	695	695	The increase in respondent burden from the analysis for ICR 2078.08 was due to an increase in applications received in the past year. Consultations indicated burden estimates per respondent increased, which is reflected in the analysis.
Most Efficient	449		(449)	0	(449)	The change in respondent burden resulted from the analysis for ICR 2078.08. EPA no longer requires forms to be submitted for Most Efficient recognition. It is now granted based on data already provided through third parties.
Total	40,391	44,110	1,029	2,690	3,719	

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.

In collecting and analyzing the information associated with this ICR, EPA will use a telephone system, personal computers, the Internet, and applicable database software. EPA will ensure accuracy and completeness of collected information by reviewing and validating each submittal. Respondents can submit the information electronically (e.g., via email), without the use of postal mail. EPA will enter the information obtained into a database and will aggregate data obtained in order to make that information available to the public and monitor the progress of program implementation. For example, all certified products are made available to the public on EPA's Product Finder Tool (<https://www.energystar.gov/productfinder/>); results of the unit shipment data collection process are summarized in a report found on EPA's website (https://www.energystar.gov/partner-resources/products_partner_resources/brand-owner/unit-shipment-data); and results of the verification testing of products is posted on EPA's website (https://www.energystar.gov/partner-resources/products_partner_resources/brand-owner/verification-testing). In addition, EPA posts award winners online at <https://www.energystar.gov/awardwinners>.

EPA collects initial information in the Partnership Agreement, which is completed and submitted by every Partner participating in ENERGY STAR. For brand owner partners who license the brand, EPA also collects a joint statement with the licensee and brand owner prior to signing the Partnership agreement. In order to be recognized by EPA as an ENERGY STAR appropriate Accreditation Body, Laboratory and/or Certification Body, entities must provide EPA with the relevant documentation to provide assurance of their competence to perform these tasks. CBs must provide EPA with a summary of verification testing completed twice a year and report information on products certified in error and products that fail verification testing as they occur. EPA also requests that Product Brand Owner Partners submit information on their unit shipments of ENERGY STAR labeled products annually by March 1st for shipments during the previous calendar year. EPA requests this information the first week of January and reminds partners in February in advance of the annual deadline. Partners interested in receiving recognition for their efforts on ENERGY STAR submit a Partner of the Year Award application.

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.

Given 72 number of forms, EPA would like to request approval to omit displaying the expiration date to reduce Agency burden in making updates and reposting forms.

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 for the Paperwork Reduction Act submissions.