

U.S. Environmental Protection Agency

Information Collection Request

Title: The 8th Drinking Water Infrastructure Needs Survey and Assessment (DWINSA)

OMB Control Number: 2040-NEW

EPA ICR Number: 7798.01

Abstract: The Environmental Protection Agency (EPA)'s Office of Ground Water and Drinking Water will conduct a survey to estimate the capital improvement needs of drinking water systems eligible to receive Drinking Water State Revolving Fund (DWSRF) funds. The survey is authorized by Sections 1452(h) and 1452(i)(4) of the Safe Drinking Water Act (SDWA), as amended by America's Water Infrastructure Act (AWIA) of 2018. This survey will be the 8th DWINSA; seven DWINSAs preceded the current survey, with the first implemented in 1995. The 8th DWINSA will survey large drinking water Community Water Systems (CWSs) (serving over 100,000 persons) via a census approach, medium CWSs (serving between 3,301 and 100,000 persons) through a statistically based sample, and small CWSs (serving 3,300 or fewer persons) through a re-sample of those that were surveyed in the 7th DWINSA. Consistent with the principles of cooperative federalism, the information collection and quality review for medium and large CWS will be facilitated by the CWSs' respective state SRF programs. The 8th DWINSA will collect information from drinking water systems in all 50 states, Puerto Rico, the District of Columbia, and the U.S. territories (American Samoa, Guam, Northern Mariana Islands, and U.S. Virgin Islands). These entities are referred to as the "56 states" or "states" within this ICR. The 8th DWINSA will not directly collect data from non-profit non-CWS (NPN-CWSs) or American Indian (AI) or Alaska Native Village (ANV) drinking water systems, except for supplemental questions for Tribal systems about their technical, managerial, and financial capability. To reduce reporting burden, the 8th DWINSA will estimate the capital improvement needs for these water systems by adjusting the needs estimates from the 7th DWINSA. The EPA will also engage with stakeholders (small system representatives, their trade associations, and technical assistance providers) to better understand and collect information on the differential infrastructure costs faced by small community water systems to incorporate into the 8th DWINSA needs estimate.

The survey will collect the CWSs' 20-year capital improvement needs through their submission of project information and supporting documentation. In addition, the survey will collect supplemental question responses. Supplemental questions will ask CWSs to identify potential barriers to accessing DWSRF funding. The EPA will ask supplemental questions about the technical, managerial, and financial capability of AI and ANV utilities. The 8th DWINSA will not collect information on lead service lines. To avoid duplication of efforts and to obtain best quality information, the EPA will use service line inventory data submitted for Lead and Copper Rule Revision (LCRR) or Lead and Copper Rule Improvement (LCRI) compliance by all DWSRF-eligible community water systems.

Information on survey forms will be collected via an EPA-hosted website, while stakeholder information will be collected through electronic (e.g., dwinsa@epa.gov) and in-person dialogue. Information will be retained within the EPA's records for the mandatory length of time after survey completion. The capital improvement needs results of the DWINSA and the information provided through stakeholder engagement will be used by the EPA primarily as a basis for allotting DWSRF funds among states. A national assessment also improves the EPA's ability to gauge long-term (20-year) capital costs of SDWA

regulations and the provision of safe drinking water to the public. The AI and ANV question responses will be used to inform the Agency of Tribal water operator certification program usage and needs, and other technical, managerial, and financial capability concerns of Tribal utilities.

The 8th DWINSA will involve 2,975 respondents (2,882 water systems/utilities & stakeholder engagement session attendees and 56 states), requiring 32,228 hours total (or 16,114 hours per year for two years) at a total cost to the respondents of \$2,121,052 (or \$1,060,526 per year for two years). Supporting Statement A, Section 12, Estimating the Respondent Burden Hours & Labor Costs, provides a detailed description of the unit burden and costs for this collection.

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.

The EPA is conducting this DWINSA pursuant to its authority under Sections 1452(h) and 1452(i)(4) of the SDWA, as amended by America's Water Infrastructure Act (AWIA) of 2018. Section 1452(h)(1) requires that "[t]he Administrator shall conduct an assessment of water system capital improvement needs of all eligible public water systems in the United States and submit a report to the Congress containing the results of such assessment within 180 days after the date of the enactment of the SDWA Amendments of 1996 and every 4 years thereafter." The 8th DWINSA will collect cost data for service line replacement, including lead to satisfy the requirement in Section 1452(h)(2). Section 1452(h)(2) states that the DWINSA must "include an assessment of costs to replace all lead service lines (as defined in section 1459B(a)(4)) of all eligible public water systems in the United States, and such assessment shall describe separately the costs associated with replacing the portions of such lead service lines that are owned by an eligible public water system and the costs associated with replacing any remaining portions of such lead service lines, to the extent practicable."

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.

The capital improvement needs results of the DWINSA will be used by the EPA primarily as a basis for allotting DWSRF funds among states. In addition, a national assessment improves the Agency's ability to gauge long-term (20-year) capital costs of SDWA regulations and the provision of safe drinking water to the public.

The Agency will collect three types of system-specific information from CWSs in states and U.S. territories:

- System inventory and characteristics data (i.e., name and address of the system, contact person, population served including consecutive system populations, total design capacity, number of connections, type of source water, whether the water system is privately or publicly owned, whether the water system purchases/sells water from/to another water system).

- Information on capital improvement projects (for example, types of need, reasons for need, capacity, cost [if available], including whether the project is for installation of new infrastructure or replacement, rehabilitation, upgrade, or expansion of existing infrastructure).
- Responses to supplemental questions.

The specific uses of each data type vary. The EPA will use system inventory and characteristics data to characterize CWSs nationwide and, in some cases, to model costs for individual water systems' capital improvement projects. The EPA will use all capital improvement information collected to estimate state and national capital improvement needs to inform DWSRF allotments, as applicable under SDWA. The EPA proposes to use the project cost data combined with the LCRR/LCRI inventory summary counts to comply with the requirement in SDWA section 1452(h)(2) to estimate the cost to replace lead service lines. The EPA will use the supplemental question responses to better inform the Agency's understanding of potential barriers to CWSs' pursuit of DWSRF funding. The responses to the supplemental questions may be used to influence the estimated needs for allotment formulation.

The 7th DWINSA is the most comprehensive analysis of the nation's public water system infrastructure needs to date. The 8th DWINSA will build on the 7th DWINSA to bring up to date EPA's understanding of the financial needs of the nation's drinking water infrastructure. However, the EPA recognizes that completing the survey can be particularly burdensome for small systems that serve under 3,300 people.

The EPA also recognizes that these small systems face specific challenges and unique barriers for implementing capital improvement projects. A small system's project size and/or its location may cause components of an infrastructure project to cost relatively more than at a larger system. For example, construction contractors typically have to travel farther to reach rural small systems and, due to distance and shipping, construction materials may take longer to arrive, thereby increasing the time and cost to complete projects. Small water systems may also encounter difficulty in accessing contractors due to smaller project scope, which may result in needing to advertise for contract bids multiple times, ultimately increasing a project's timeline. Additionally, small system project costs are more per person than for larger drinking water systems, according to EPA's Office of Water State Revolving Funds project database.

The EPA's goal is to reduce the burden on systems serving 3,300 or fewer people while also considering their unique challenges as the agency estimates their capital improvement needs for the 8th DWINSA. The EPA will streamline data collection from small systems by surveying all small systems previously surveyed in the 7th DWINSA via phone interview. EPA will review their previously reported capital improvement needs, request updates and additions, and adjust unchanged needs to 2026 dollars. The EPA may also adjust small system cost models based on key stakeholder feedback on the unique cost differentials faced by these small systems (for example, discussing changes in needed physical infrastructure, changes in costs for projects, and other unique influencing factors). Finally, the EPA will also consider information gathered from responses to supplemental questions when adjusting small system capital improvement needs estimates.

The Agency's goal is to allow these small systems serving fewer than 3,300 people to direct more time and resources to serving their communities while ensuring their unique challenges and barriers are incorporated into future needs estimates and financial determinations.

The Agency will also collect supplemental question responses from AI and ANV utilities. The responses will be used to inform the Agency of Tribal water operator certification program usage and needs, and AI and ANV utility managerial and financial capability concerns. Answers to these supplemental questions may be used to influence allotment formulation.

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 EPA will use a Microsoft Excel-based information collection form similar to those used for previous DWINSAs. The EPA will use a new Web-based data system hosted by the EPA for the 8th DWINSA.

The data collection form has been used for the previous seven DWINSAs with minor changes to address specific supplemental questions or enhancements. The form supports respondents' easy transfer of capital improvement planning information from other datasets to the Excel form. States and their CWSs are familiar with this information collection form. The EPA will survey small systems directly by telephone. The EPA will input small system responses into the Excel form.

The information collection forms will be pre-populated with system-specific source, size and ownership characteristics that are then verified or updated by the respondent. State CWSs that are selected for the 8th DWINSA that participated in the 7th DWINSA will have their previously reported capital improvement needs also prepopulated on their forms to facilitate project review and updates. This approach has been used since the 5th DWINSA and reduces respondent burden by focusing their efforts on data review and updates.

For the AI and ANV utility supplemental questions, a Microsoft Excel-based information collection form will be used to report responses to the supplemental questions. The form is similar to what was used for Operator Workforce supplemental questions in the 7th DWINSA. The information collection forms will be pre-populated with utility-specific source, population served, and ownership characteristics that are then verified or updated by the respondent.

The Web-based data system for the 8th DWINSA will be similar to the data system previously used for the previous four DWINSAs, with technological advances and other improvements implemented. The Web-based system includes an information entry interface for the states to upload the survey responses and associated project documentation; the Agency and its contractor to download data for quality control review and upload reviewed survey data; and for states and EPA Regions to access, download, review, and suggest modifications to the EPA on their projects' data.

The proposed data system is planned to provide the following functions:

- Data entry through the state or EPA, interface for single-survey or batch upload of Microsoft Excel-based survey responses.
- Data verification through bounds checking and project coding, project capacities, and project costs.

- A password-protected data modification documentation interface.
- Data access for states and EPA Regions for review of their data and to respond to the EPA quality assurance outcomes.
- Predefined summary and statistical reports.

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.

To the best of the EPA's knowledge, up-to-date state-by-state information on water system capital investment needs is not available from any other source, nor is data on AI and ANV utility operations and maintenance. LCRR/LCRI lead service line (LSL) compliance data is an exception: the EPA will use the LCRR/LCRI data to calculate the number of LSLs nationally and by state and estimate the total national cost and cost by state for LSL replacements. Some of the data collection efforts the EPA considered include the following:

- **Safe Drinking Water Information System (SDWIS).** Inventory data and information on system characteristics have been collected by states and EPA Regions and entered into the SDWIS. For systems selected for the 8th DWINSA, the EPA will pre-populate the SDWIS system characteristics data (i.e., name and address of the system, contact person, address, population served, number of connections, type of source water, and whether the system is privately or publicly owned) on the data collection form and ask the respondents to provide information only if the SDWIS data are inaccurate or missing. SDWIS does not contain information on water system total design capacity or capital investment needs.
- **Community Water System Survey (CWSS).** The EPA completed a statistical survey in 2006 that focused on the operating and financial characteristics of CWSs. The CWSS had a different objective than the DWINSA. The CWSS was designed to characterize operating and financial aspects of CWSs. In contrast, the DWINSA will be used to develop national estimates of capital investment needs. In addition, the CWSS's targeted precision was on a national basis, whereas the DWINSA will provide state-level estimates for full participation states. The DWINSA supplemental questions do not duplicate data collection from the CWSS.
- **Economic Analyses (EAs) for National Primary Drinking Water Regulations.** The Agency has developed EAs for its National Primary Drinking Water Regulations. These documents estimate the costs of complying with proposed and final regulations. EAs do not typically include an estimate for capital projects needed to maintain compliance with existing regulations. Therefore, the EAs are not an adequate substitute for the DWINSA. In addition, the estimates included in the EAs are provided as nationwide estimates. As discussed above, EPA is conducting the DWINSA because the Agency needs state-level estimates of infrastructure capital need to develop the allotment formula for the DWSRF.
- **State Needs Surveys.** Several states have conducted needs surveys of their own drinking water systems. The state results cannot be extrapolated to the nation as a whole because the state surveys do not use consistent methodologies and do not account for national variations in system characteristics and needs.

- **The 1st through 7th DWINSAs.** Under the SDWA, the EPA must conduct the DWINSA every four years. The approach for the 8th DWINSA collects substantial new data from the field to report up-to-date information on changes in the relative level of infrastructure needs at the state level as well as changes in the total national need.
- **The Indian Health Service (IHS) Sanitation Deficiency System (SDS) and Operation and Maintenance Data System (OMDS).** SDS is an inventory of projects developed to address existing sanitation deficiencies in American Indian and Alaska Native communities. The SDS includes drinking water, wastewater, and solid waste facilities. OMDS is a data system for drinking water, wastewater and solid waste systems and the organizations that operate sanitation facilities on tribal lands. Neither OMDS or SDS reports operations and maintenance needs or addresses operator certification or managerial or financial capacities.

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.

The 8th DWINSA will not collect any data from NPNCWSs. For small systems, EPA will walk through the survey questions via a phone interview, reducing burden by using information submitted under the 7th DWINSA as a starting point, and requesting only new or updated information. For small and Tribal utilities, the EPA will provide technical assistance for completing the supplemental questions. In an effort to minimize burden, it is anticipated that data collection for small systems and Tribal utilities may adequately occur via a phone call. Additionally, EPA will engage key stakeholders, including technical assistance providers, trade associations, and small systems, through hybrid (virtual and in-person) facilitated meetings, to improve the Agency's understanding of the overarching factors that affect small systems' project costs. Information collected from these engagements may be used to augment small systems' reported needs as part of the 8th DWINSA.

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.

The EPA will use the results of the 8th DWINSA to allot DWSRF funds to states. The findings of previous DWINSAs have shown changes in the relative capital investment needs of states between each survey, resulting in changes in DWSRF allotments to states. Furthermore, Section 1452(h) requires that the EPA assess water system capital improvement needs of all eligible public water systems in the United States and submit a report to the Congress containing the results of such assessment every four years. Less frequent data collection and analysis would not meet the statute's mandate.

7. GENERAL GUIDELINES

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

The proposed collection does not create special circumstances requiring justification under 5 CFR 1320.5(d)(2).

8. PUBLIC COMMENT AND CONSULTATIONS

8a. Public Comment

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

To comply with the 1995 Amendments to the Paperwork Reduction Act (PRA), the EPA solicited public comment on this ICR for a 60-day period before submitting it to OMB. Specifically, the EPA published a notice in the *Federal Register* (FR) (89 FR 101008, December 13, 2024) requesting comment on the estimated respondent burden and other aspects of this ICR (Docket ID Number EPA-HQ-OW-2024-0561). Please note that the original published OPM Control Number in the first Federal Register Notice was incorrect and it is 2040-NEW until formally assigned by the Office of Management and Budget. This notice is included in Appendix A. Seven organizations submitted comments. Unleaded Kids provided a set of three comments, the Vermont Department of Environmental Conservation provided a set of three comments, BlueConduit provided a set of two comments, the Council of Infrastructure Financing Authorities (CIFA) provided a set of three comments, the Environmental Policy Innovation Center (EPIC) provided a set of six comments, the Association of Metropolitan Water Agencies (AMWA) provided a set of five comments, and the American Water Works Association (AWWA) provided a set of twelve comments. Before submitting the ICR to OMB, the EPA considered all comments received and determined if any adjustments were needed to the EPA's approach to data collection, to the burden and cost calculations, or to the supporting statement for this ICR. Comments that addressed cost and hour burden primarily focused on LSL inventory information and the cost of replacing LSLs. The comments encouraged the use of LCRR/LCRI inventory compliance data, which the Agency has adopted. One commenter also requested that the EPA reconsider its approach to small water systems. The EPA will now engage and collect data from small systems who were surveyed for the 7th DWINSA by phone. The EPA will also engage with stakeholders to better understand the differential in infrastructure costs faced by small water systems and incorporate it into the 8th DWINSA needs estimate (see Section 8b.). Comments received and the EPA's responses are included in Appendix C. An additional *Federal Register* notice will be published when this ICR was submitted to OMB. The public comment period for this additional notice is 30 days.

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 September 2024, the EPA assembled the DWINSA Coordinator Workgroup that consisted of EPA Headquarters, EPA Regions, and state representatives to discuss the approach for the 8th DWINSA. The purpose of the workgroup is to discuss updates, recommendations, and supplemental questions for the 8th DWINSA through a collaborative approach. The information gathered from the DWINSA Coordinator Workgroup contributed to the refinement of project acceptance criteria and supplemental questions. The EPA also solicited feedback on alternatives to reduce data collection burden from the Workgroup. The DWINSA Coordinator Workgroup will continue to convene on a routine basis and discuss the 8th DWINSA leading up to the information collection.

Similar to previous DWINSAs, the 8th DWINSA includes supplemental questions. The EPA presented draft versions of the original ten questions to the DWINSA Coordinator Workgroup and incorporated initial feedback. An additional five questions were added between the first and second Federal Register Notice (see more discussion on the motivation for these additional questions in Section 2 of this document).

In addition, the EPA has conducted outreach with trade associations and other stakeholders, including but not limited to CIFA, the Association of State Drinking Water Administrators (ASDWA), AWWA, and AMWA through webinars and meetings. The EPA is engaging with key stakeholders, including technical assistance providers and trade associations, as part of the 8th DWINSA (see Section 5 of this document for more information).

Starting in December 2024, the EPA worked with the Indian Health Service's Division of Sanitation Facilities Construction and the National Tribal Water Council to develop the Tribal supplemental questions. Following this input, the EPA assembled a short-term workgroup to further target and refine the questions.

9. PAYMENTS OR GIFTS TO RESPONDENTS

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

The Agency does not intend to provide payments or gifts to respondents as part of this collection.

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.

This information collection does not require the respondent to disclose any confidential information. Respondents are not obliged to respond to this strictly voluntary information collection. The information collection form states the information provided for this survey can be requested by the public. Further, respondents should eliminate any confidential business information from their reply.

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 8th DWINSA does not ask sensitive questions.

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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12a. Respondents/NAICS Codes

The respondents for the 8th DWINSA are CWSs and their respective state DWSRF programs, AI and ANV utilities, and the Navajo Nation. According to 40 CFR Part 141.2, a CWS is a “public water system which serves at least 15 service connections used by year-round residents or regularly serves at least 25 year-round residents.” The North American Industry Classification System (NAICS) code for a public water system is 221310 (Water Supply and Irrigation Systems). Ancillary systems (i.e., those that supplement the function of other establishments like factories, power plants, mobile home parks, etc.) cannot be categorized in a single NAICS code. For ancillary systems, the NAICS code is that of the primary establishment or industry. For government establishments providing public administration of American Indian and Alaska Native Village affairs, the NAICS code is 921190 (Other General Government Support). State agencies that include drinking water programs are classified as NAICS code 924110 (Administration of Air and Water Resources and Solid Waste Management Programs) or 926130 (Regulation and Administration of Communications, Electric, Gas and Other Utilities).

Large, Medium, and Small Community Water System Respondents

For the 8th DWINSA, the EPA will gather information from CWSs of all sizes. For the purposes of this document, the EPA has approximated sample sizes for the 8th DWINSA state effort based on the inventory listing available in the second quarter of Fiscal Year 2024 (see Supporting Statement Part B for a full description of the statistical sampling design). Fifteen states are expected to not participate in the statistical portion of the 8th DWINSA (i.e., they will not collect 20-year capital improvement information from their state medium CWSs; see also Section 12b., Requested Information). It is estimated that these states would have less than 1 percent of the total need and all states automatically receive at least 1 percent of the total DWSRF allotment per SDWA. These states are referred to as “partial participation” states. The capital improvement needs of the full participation states will be used to estimate the capital improvement needs for the medium CWSs in the partial participation states. Therefore, burden estimates are based on the size (large, medium, and small) and state type (full versus partial participation) of the surveyed systems across the 2,735 CWSs and 56 state DWSRF programs:

- 842 large CWSs that are census surveyed (i.e., every large CWS is invited to participate, regardless of whether they are in a full or partial participation state).
- 982 medium CWSs in full participation states:
 - o 767 panel medium CWSs (returning DWINSA participants as part of the modified panel approach).
 - o 215 refresh medium CWSs (new DWINSA participants as part of the 25% refresh sample).
- 311 medium CWSs in partial participation states (only receive the supplemental questions).
- 600 small CWSs (all returning 7th DWINSA participants)

For the burden estimate, the EPA assumes that 56 states (50 states plus Puerto Rico, the District of Columbia, Northern Mariana Islands, American Samoa, Guam and the U.S. Virgin Islands) will provide support for medium and large systems since data collection is facilitated by their respective state DWSRF programs. The EPA will collect updated capital investment information and responses to the supplemental questions for small systems.

Additional Engagement: Small System and Association Respondents

Small system engagement for the 8th DWINSA will also include an EPA hosted hybrid (in-person, as well as virtual) consultation with stakeholders who are fluent in small-system issues and with small systems directly. The stakeholders will include the National Rural Water Association (NRWA), the Rural Community Assistance Partnership (RCAP), the American Water Works Association (AWWA), and some small water system representatives. These engagement session(s) will aim to identify factors influencing cost to small systems as a potential basis for a small system cost adjustment. Attendees for these sessions are expected to be:

- 25 small system attendees
- 12 small system association representative attendees

Tribal System Respondents

The Tribal portion of the survey will only collect responses to supplemental questions. Therefore, burden estimates are the same regardless of utility size. The AI inventory consists of 103 utilities and the ANV inventory consists of 44 utilities for a total of 147 AI and ANV utilities. For the burden estimate, the EPA assumes that the 10 Tribal EPA Regions will provide support and facilitate responses to the Operations and Maintenance (O&M) supplemental questions.

The 8th DWINSA will not collect new capital improvements needs data from non-profit non-CWS (NPNCWSs) or AI or ANV drinking water systems. To reduce reporting burden, the 8th DWINSA will estimate the capital improvement needs for these water systems by adjusting needs from the 7th DWINSA.

12b. Information Requested

A representation of the information collection form, Lists of Codes (that describe how capital projects are coded within the information collection form), and supplemental questions are attached as Appendix B.

For the state survey, respondents will provide information on:

- System inventory and characteristics data,
- Information on capital improvement projects,
- Responses to supplemental questions (i.e., potential funding barrier questions), and
- Feedback at small system stakeholder engagement sessions.

For the AI/ANV supplemental questions, respondents will provide information on:

- Utility characteristics data
- Responses to supplemental questions (i.e., technical, managerial and financial capability).

First, the data collection form for the state survey (shown in Appendix B) asks respondents to verify or correct system characteristic information (i.e., name and address of the system, contact person, population served, total design capacity, number of connections, type of source water, and whether the water system is privately or publicly owned). For the AI and ANV survey (shown in Appendix B), the data collection form asks respondents to verify or correct utility characteristics information (i.e., name and address of the utility, contact person, population served, source water type, and whether the utility is privately or publicly owned). It is customary business practice for the water system or utility to maintain this information. The respondent will either indicate that the information is correct as provided or enter the correct information in the space provided. States and Regions verify this information in advance of the data collection instrument being sent to the water systems. Based on previous assessments, the EPA anticipates that very few water systems will need to correct the information provided.

Secondly, full participation respondents (i.e., CWSs in full participation states) provide information on their capital improvement projects (e.g., type of project, reasons for project, capacity, cost, cost [if available], including whether the project is for installation of new infrastructure or replacement, rehabilitation, upgrade, or expansion of existing infrastructure). Project information is coded using the Lists of Codes (see Appendix B). For medium and large CWSs, states verify that the respondent provided the proper coding and supporting documentation for the capital improvement projects. The medium CWSs in partial participation states do not provide information on their capital improvement projects. For small CWSs, the EPA will input this information, including the proper coding, on behalf of respondents. More detail on the capital improvement projects follows later in this section.

Lastly, all surveyed CWSs will receive the supplemental questions. The responses from the multiple-choice supplemental questions will help the EPA to better understand if and how certain dynamics affect infrastructure and accessing funding. Qualitative responses to these questions will provide context on challenges faced by DWSRF-eligible water systems. These questions will focus on the impact of operations and maintenance (O&M) and the attributes of technical, managerial, and financial (TMF) capability, thereby extending the information learned during the 7th DWINSA on workforce dynamics.

AI and ANV utilities will receive a separate set of supplemental questions. These supplemental questions will focus on Tribal water operator certification program usage and needs, and AI and ANV utility managerial and financial capability concerns.

For the 8th DWINSA, the EPA will collect capital improvement needs data for state CWSs serving populations of greater than 100,000 persons (referred to as state large CWSs), state CWS serving populations between 3,301 through 100,000 persons (referred to as state medium CWSs), and state

CWS serving populations of 3,300 and fewer persons (referred to as state small CWSs). The EPA solicited feedback on alternative suggestions to reduce burden and obtain the best quality information to estimate the cost to replace the nation's LSLs, including potentially using LCRR/LCRI service line inventory information. The EPA will use LCRR/LCRI service line inventory data to estimate the national need to replace LSLs and will collect LSL replacement cost data via the project table of the 8th DWINSA survey form.

Exhibit A - 1 presents the 8th DWINSA recipients, including the capital improvement and supplemental questions by type of system and population served.

Exhibit A - 1: 8th DWINSA Participation and Respondent Types

8 th State DWINSA			
State Type/ Respondent Type	CWSs serving ≤ 3,300 persons	CWSs serving 3,301 - 100,000 persons	CWSs serving >100,000 persons
Full Participation States	• Capital improvement projects • Supplemental questions • Systems surveyed as part of the 7th DWINSA	• Capital improvement projects • Supplemental questions • Panel approach yields state-level estimates for both types of questions for medium CWSs	• Capital improvement projects • Supplemental questions • Census approach yields state-level estimates for both types of questions for large CWSs
Partial Participation States	• Capital improvement projects • Supplemental questions • Systems surveyed as part of the 7th DWINSA	• Supplemental questions only • Random sample yields state-level estimates for medium CWSs response to supplemental questions	• Capital improvement projects • Supplemental questions • Census yields state-level estimates for both types of questions for large CWSs
8 th Tribal DWINSA			
Respondent Type	AI and ANV Utilities serving 3,300 or fewer persons	AI and ANV Utilities serving >3,300 persons	
American Indian and Alaska Native Village Water Utilities	• O&M Supplemental Questions only • National Sample for AI Utilities and for ANV Utilities	• O&M Supplemental Questions only • National Sample for AI Utilities and ANV Utilities	
Key Stakeholder Engagement			
Respondent Type	Small System Staff	Association Representatives	
Small System Stakeholders	• Attendance for discussion meeting(s)	• Attendance for discussion meeting(s)	

For the CWSs providing information on the 20-year capital investments, they are asked to provide information associated with specific types of capital improvement projects:

- Source
- Treatment
- Finished or treated water storage and pumping
- Transmission and distribution

- Other (projects not distinctly associated with one of the specified project types but that are still DWSRF-eligible)

For each capital improvement project, the respondent is further asked to provide descriptive information:

- Briefly describe the needed capital improvement project (e.g., “routine distribution system replacement,” “filtration plant upgrade,” “high service pump replacement,” “corrosion control treatment,” “storage tank rehabilitation”). Information is collected on a project-specific basis because it is most commonly available to respondents in that form and because documentation, when available, is usually developed on a project-specific basis.
- Provide the codes that best describe the project’s type of need and reason (see Appendix B for Lists of Codes).
- Indicate if the project is to install new infrastructure to meet current population demands, replace old infrastructure, expand or upgrade existing infrastructure (such as increasing the capacity of treatment plants to meet current population demand), or rehabilitate existing infrastructure.
- Indicate whether the project is needed now to protect public health or is not needed now but will be necessary to continue providing safe drinking water within the next 20 years.
- Provide design capacity when applicable (i.e., millions of gallons per day (MGD) for treatment and pumping; millions of gallons (MG) for storage; the diameter and number of feet of distribution or transmission pipe; and the diameter and number of backflow prevention devices/assemblies, service lines, valves, and water meters). The EPA will use these parameters to model project costs.
- If available, provide the capital cost estimate and year and month (if known) of the estimate. The EPA will use this information to include the cost of the project in the 8th DWINSA. The year and month are important because they will allow the EPA to account for differences in the value of money over different years and to convert all costs to a common year. This information will also be used to update the 8th DWINSA cost models.
- Provide an estimate of the total length of pipe in the water system. This information will only be necessary for water systems that submit pipe projects but do not have independent documentation of need for these projects (i.e., planning document that was developed for purposes that are independent of the DWINSA, sanitary survey or leak detection study results, or water main break records). It is expected that not all systems will need to provide this inventory information because they will submit pipe projects that are supported by independent documentation.
- Indicate the type of documentation using the EPA’s Lists of Codes (see Appendix B) that documents why the project is needed and, if an existing cost estimate (developed for other purposes independent of the DWINSA) is provided, indicate the documentation that provides the cost. NOTE: The EPA discourages systems or states from developing new cost estimates solely for the purposes of the 8th DWINSA. For needs identified without independent cost estimates, the Agency instead will rely on extrapolations from cost models that are based on extensive independently-documented cost estimates. The use of the documentation type codes in the Lists of Codes will:
 - Help verify that adequate documentation of the need has been submitted.
 - Help determine if the project can be accepted in the DWINSA.
 - Help gauge cost-reasonableness.

The data collection form consists of a project table in which the water systems list all the DWSRF-eligible capital improvement projects for the 20-year survey period of January 1, 2026, through December 31, 2045. The data collection form is in a Microsoft Excel format.

For respondents to the 8th DWINSA that did not participate in the 7th DWINSA, the EPA will provide, for distribution by the states, a data collection form with the water system characteristics information. The respondent will be asked to populate this document with a list of all the system's planned capital improvement projects that would meet the criteria for acceptance to the DWINSA for the survey period of January 1, 2026, through December 31, 2045. The system must provide documentation for each project. The state will collaborate with its systems to ensure that all projects meet acceptance requirements established for the 8th DWINSA, are properly coded, include cost modeling parameters if a documented cost is not provided, and have the necessary documentation of need to support including the project in the DWINSA.

For respondents to the 8th DWINSA that participated in the 7th DWINSA, the EPA will provide, for distribution by the states as applicable, a system-specific data collection instrument that includes a project table with a pre-populated list of the projects used as the final response to the 7th DWINSA. The respondents will be asked to update the information (e.g., cost estimate) and remove projects that have been completed or are no longer needed. The respondent will also be asked to add any new projects that were not included in the 7th DWINSA. All projects must meet documentation and project acceptance criteria established for the 8th DWINSA. For small CWSs, the EPA will collect information via phone call, fill in the data collection form, ensure that all projects meet acceptance requirements established for the 8th DWINSA, are properly coded, and include cost modeling parameters if a documented cost is not provided.

The respondent is also asked to provide his or her name, title, address, phone number, and e-mail address. This information is requested in case the EPA or the state must contact the respondent for clarification of any response.

For medium and large CWSs, the respondent is asked to attach documentation for all needs and costs reported in the 8th DWINSA. Systems are encouraged to provide inventory data on their systems. Only where noted above will the inventory data be necessary.

AI and ANV Utilities will only be asked the supplemental questions. No documentation of the reported information is requested for the response.

12c. Respondent Activities

8th DWINSA – CWSs Serving More Than 3,300 Persons

To complete the data collection instrument, the following activities are anticipated for CWSs serving more than 3,300 persons:

- **Participate in an informational telephone call.** Respondents will receive a call from the state to inform respondents about the upcoming DWINSA, describe the purpose of the DWINSA and explain how respondents will receive and submit the data collection instrument. The state will

also describe the information that will be requested and the timetable for completing and returning the data collection instrument.

- **Read the cover letter.** Respondents will review the cover letter and instructions accompanying the data collection instrument. This information will reiterate the details conveyed during the informational phone call.
- **Collect and copy supporting documentation.** Respondents will locate the necessary supporting documentation in system files and copy it or obtain electronic copies.
- **Call for technical assistance.** Respondents will call their state contacts for technical assistance, if necessary.
- **Complete the data collection instrument.** Respondents will discuss current needs with the state and complete the data collection instrument, including an estimate of the total amount of pipe in the system if any pipe project is submitted without independent documentation of need (e.g., a planning document). The data collection instrument will be in an electronic format and will be transmitted to respondents and returned to states via email. Supporting documentation can also be submitted electronically, or other arrangements can be made with the state to provide these documents.
- **Respond to call back from the state about the status of 8th DWINSA.** Respondents who do not provide information to the states in a timely manner will be contacted by the state to provide a brief report on the status of the 8th DWINSA response.

8th DWINSA – CWSs Serving 3,300 and Fewer Persons

- **Review the information package.** The EPA will send respondents an email package with a cover letter, description of the process for the upcoming DWINSA, instructions and a summary of the system's 7th DWINSA capital improvements needs projects. Respondents will review the package.
- **Participate in a phone call with EPA.** Respondents will be asked to provide updates to capital improvement projects documented as part of the 7th DWINSA and respond to the supplemental questions. During the phone call the EPA will verbally collect data to update the data collection instrument and supplemental questions. After the call the EPA will fill out the data collection instrument and upload it into the data entry portal.

8th DWINSA –Key Stakeholder Engagement

- **Prepare for meeting.** Attendees will be provided with meeting materials in advance.
- **Attend meeting.** Attendees will be present for the duration of the meeting.
- **Answer follow-up questions.** Attendees will respond to follow-up questions posed by EPA.
- **Provide feedback.** Attendees will provide brief feedback about the meeting.

8th DWINSA – American Indian and Alaska Native Village Utilities

- **Informational telephone call from the EPA Regional Office.** Respondents will receive a call from the EPA Regional Office to inform respondents about the upcoming DWINSA, describe the purpose of the DWINSA and explain how respondents will receive and submit the data collection instrument. The EPA Regional Office will also describe the information that will be requested and the timetable for completing and returning the data collection instrument.
- **Answer questions posed by the EPA Regional Office.** Respondents will discuss the supplemental questions with the EPA Regional Office. The data collection instrument will be in an electronic format and will be transmitted to respondents and returned to EPA Regions via email.

8th DWINSA – State Activities

For this burden estimate, the EPA assumes all states will participate in certain “up-front activities” where the measure of the activity burden is on an “hours per state” basis and the combined burden on all states is calculated by multiplying by the 56 states.

The burden of additional state activities is measured on an “hours per system” basis and the combined burden on all states is calculated by multiplying the number of systems being sampled in the survey. The hours per system burden differs between systems serving 50,000 or more persons, systems serving 3,301 to 50,000 persons, and systems serving less than 3,301 persons. The combined additional burden on all states from surveying the larger systems is calculated by multiplying the hours per system burden of these systems by 1,057, the total number of the larger systems (that serve 50,000 or more persons) being sampled in the survey. The combined additional burden on all states from surveying medium systems serving 3,301 to 50,000 persons is calculated by multiplying the hours per system burden of these systems by 767, the total number of these smaller systems being sampled in the survey.

The combined additional burden on all states from surveying the small systems (serving less than 3,301 persons) for full and partial participation states is calculated by multiplying the hours per system burden of these systems by 600, the total number of these small systems being sampled in the survey.

This ICR assumes all systems in the survey serving 3,301 to 100,000 persons in partial participation states will receive the supplemental questions, but not the DWINSA 20-year infrastructure need project table. The combined additional burden on all partial participation states for these systems is calculated by multiplying the per system burden of the supplemental questions by the total number of these systems (311).

The total burden on all states is calculated by adding the combined burden based on “hours per state” with the combined burden based on hours per system for all systems to be surveyed.

State Up-Front Activities

This first activity category includes the states’ “up-front activities” for helping the EPA prepare for the 8th DWINSA.

- **Participate in pre-survey technical assistance and other pre-survey efforts.** This activity includes participating in pre-survey technical assistance sessions offered by the EPA and

becoming familiar with the survey design, data collection instrument, and project acceptance criteria.

- **Perform miscellaneous administrative activities.** States will perform various administrative duties prior to the 8th DWINSA (e.g., establishing system files). In addition, state management will explain the 8th DWINSA to staff and allocate resources.

State Data Collection Activities for CWSs Serving More Than 3,300 Persons

Full participation states will conduct the following activities for CWSs serving more than 3,300 persons and partial participation states will conduct these activities for CWSs serving more than 100,000 persons during the data collection phase of the 8th DWINSA:

- **E-mail survey package to water systems.** States will provide each system in the 8th DWINSA with a survey package, which will be delivered via e-mail.
- **Telephone systems to ensure participation and provide instructions.** To improve response rates, states will telephone the water systems early in the process to ensure that they have received the survey package and understand how to complete the data collection instrument.
- **Provide technical assistance.** States will provide technical assistance to systems by answering their questions about the data collection instrument and how needs should be represented.
- **Call systems that do not return the data collection instrument by a certain date.** To improve response rates, states will telephone systems that have not returned their assessment by a specific date to encourage participation.
- **Review completed data collection instruments and documentation.** The data collection instrument will be returned directly to the state. State personnel review the information on the data collection instrument as well as any accompanying documentation. The state's review will help ensure the response is thorough and that all projects meet DWINSA standards acceptance criteria established for the 8th DWINSA. The state's review will provide the first quality assurance/quality control check.
- **Discuss results with the EPA.** After the state reviews the submission and documentation, the state submits the data to the EPA for review and analysis. The EPA performs a second quality assurance/quality control check to ensure all data are documented and allowable. Any issues regarding the project descriptions or adequacy of the documentation of the data will be resolved by the EPA and the state. States are provided access to view the data system and are able to verify that the data have been entered into the data system.

State Data Collection Activities for CWSs Serving 3,301 to 100,000 Persons in Partial Participation States

Partial Participation states will conduct the following activities for CWSs serving 3,301 to 100,000 persons during the data collection phase of the 8th DWINSA:

- **Send an informational email to the system.** States will develop and send an informational email to each system to explain the supplemental question data collection.
- **E-mail the data collection instrument to systems.** States will provide each system with a data collection instrument containing only the supplemental questions, which will be delivered via e-mail.

- **Phone call to facilitate collection of supplemental question data.** States will telephone the system to discuss the supplemental question responses, review the responses, and then submit to the EPA.

EPA Data Collection Activities for CWSs Serving 3,300 and Fewer Persons

EPA will conduct the following activities for the CWSs serving 3,300 and fewer persons:

- **Participate in a phone call with EPA to collect updated Infrastructure needs.** Respondents will be asked to provide updates to capital improvement projects documented as part of the 7th DWINSA and respond to the supplemental questions. During the phone call the EPA will verbally collect data to update the data collection instrument and supplemental questions. After the call the EPA will fill out the data collection instrument and upload it into the data entry portal.

8th DWINSA – Navajo Nation Activities

As a utility receiving the questions, the Navajo Nation does not have a similar role in administering surveys to water systems as it did in the 7th DWINSA.

Collection Schedule

The current schedule assumes the EPA would receive OMB approval for data collection by July 2026. The schedule will be adjusted based on the final approval date. The EPA will send data collection instruments to states, the Navajo Nation, and EPA Regions for the AI and ANV utilities as soon as possible after OMB approval. All utilities will be asked to complete their survey within six months after survey launch.

To facilitate efficient data review by the EPA, the Agency will ask to receive one-third of the responses within two months after data collection begins. Data for two-thirds of the responses will be due within three months and all data will be due within six months. Exhibit A - 2 Exhibit A - 2: summarizes the major collection milestones.

Exhibit A - 2: Proposed Collection Schedule

Task	Date
Information Collection Request Released for 30-day Public Review	May 2026
Information Collection Request Submitted to OMB	May 2026

Task	Date
Electronic Delivery of Data Collection Instruments to States and EPA Regions	July 2026
All Sent Data Collection Instruments Returned to the EPA	December 31, 2026
All Information in the Data System Finalized	March 2027
Report to Congress	Summer 2027

12d. Respondent Burden Hours and Labor Costs

The estimates are presented by system size and whether they also participated in the 7th DWINSA. For the purpose of estimating the maximum burden hours, the EPA assumes a 100 percent response rate from the sample of systems. The response rate in previous DWINSAs has always exceeded 90 percent. Approximately 2,735 systems and 147 AI/ANV utilities will participate in the 8th DWINSA based on their size and participation level (full or partially participating), as well as 37 small system stakeholder engagement session attendees:

- CWSs serving more than 50,000 persons that fully participate = 1,057
 - o 842 serving more than 100,000 persons and participated in the 7th DWINSA.
 - o 161 serving 50,001-100,000 persons in fully participating states and participated in the 7th DWINSA.
 - o 54 serving 50,001-100,000 persons in Fully Participating States and did not participate in the 7th DWINSA.
- Systems serving 3,301-50,000 persons in Fully Participating States = 767
 - o 575 serving 3,301-50,000 persons and participated in 7th DWINSA.
 - o 192 serving 3,301-50,000 persons and did not participate in 7th DWINSA.
- CWSs serving 3,300 and fewer persons = 600
- Systems serving 50,001-100,000 persons in Partial Participation States = 31
- Systems serving 3,301-50,000 persons in Partial Participation States = 280
- American Indian utilities = 103
- Alaska Native Village utilities = 44
- Small system key stakeholders
 - o Small water system representatives = 25
 - o Water industry representatives = 12

For burden estimates for water systems, it is important to note that many of the systems participating in the 8th DWINSA were also sampled in the 7th DWINSA. As described in detail in Section B.2, the EPA will use a modified panel approach to select water systems to be sampled. This approach will result in a re-sampling of 75 percent of the CWSs serving 3,301 to 100,000 persons that were sampled for the 7th DWINSA. Approximately 25 percent of CWSs serving 3,301 to 100,000 persons sampled for the 8th DWINSA did not participate in the 7th DWINSA. All CWSs serving 3,300 and fewer persons sampled for the 7th DWINSA will be re-sampled for the 8th DWINSA; there will be no systems serving 3,300 and fewer

persons participating in the 8th DWINSA that were not sampled for the 7th DWINSA. Because the EPA will conduct a census of all CWSs serving more than 100,000 persons, the total percentage of CWSs sampled for the 8th DWINSA that were also sampled for the 7th DWINSA will be greater than 75 percent.

These re-sampled respondents will be able to verify and update their previously submitted capital investment data. It is anticipated this will reduce the burden that some entities will have to spend on portions of their survey. For these respondents, the EPA provides separate burden estimates for the CWSs being re-sampled with a higher burden estimate for the CWSs being sampled in the 8th DWINSA that were not sampled in the 7th DWINSA. The EPA developed formulas to calculate the proportional share of the burden estimates for systems that did and did not participate in the 7th DWINSA to develop the total burden estimates.

CWSs Serving More than 50,000 Persons

The respondent burden for the systems serving more than 50,000 persons consists of systems' burden for completing the data collection instrument. The EPA estimates that the total unit burden is 7.69 hours per system. Exhibit A - 3 shows the unit burden for 1,057 systems serving more than 50,000 persons.

As described above, 75 percent of CWSs serving 50,001 to 100,000 persons sampled for the 8th DWINSA were also sampled for the 7th DWINSA, and the EPA conducted a census of CWSs serving populations of more than 100,000 persons in the 7th DWINSA. To calculate the total percentage of CWSs serving more than 50,000 persons that will participate in both the 7th and 8th DWINSAs, the EPA uses the following formula:

$$(842 + (0.75 \times 215)) / (842 + 215) = 0.95$$

In this formula, 842 is the total number of CWSs serving more than 100,000 persons that will participate in the 8th DWINSA, and 215 is the total number of CWSs serving 50,001 to 100,000 persons in full participation states in the 8th DWINSA.

The percentage of CWSs serving more than 50,000 persons that will participate in the 8th DWINSA and did not participate in the 7th State DWINSA is calculated using the following formula:

$$(0.25 \times 215) / (842 + 215) = 0.05$$

These two formulas are used below to calculate the total burden estimates.

- **Participate in informational phone call.** All systems will participate in an informational phone call with the state. On this call, the state will inform respondents about the upcoming DWINSA, describe the purpose of the DWINSA, and explain how respondents will receive and submit the data collection instrument. The state will also describe the information that will be requested and the timetable for completing and returning the data collection instrument. For systems that participated in the 7th DWINSA, each informational call should last about 15 minutes (0.25 hours).

The EPA anticipates that systems that did not participate in the 7th DWINSA will need more time on the phone call to understand the process. Each informational call should last about 20 minutes (0.33 hours).

Consequently, the average burden per system is as follows:

$$[0.25 \times (842 + (0.75 \times 215)) / (842 + 215)] + [0.33 \times (0.25 \times 215) / (842 + 215)] = 0.25 \text{ hrs/system.}$$

The EPA anticipates that management staff will take the call at half of the systems and technical staff will take the call at the other half.

- **Read cover letter.** The EPA anticipates systems that participated in the 7th DWINSA will need less time to read the cover letter and data collection instructions because they will already be familiar with the process and will only need to become familiar with aspects of the survey that have changed. The EPA estimates that the burden for each of these systems is 45 minutes (0.75 hours) and breaks down as follows:
 - A manager will receive the 8th DWINSA, read the cover letter and review the instructions and other materials. The estimated time for managers to perform these activities is 15 minutes (0.25 hours).
 - Technical staff will read the cover letter and data collection instructions in detail. The EPA estimates that the burden for this activity is 30 minutes (0.50 hours) per system.

The EPA estimates that systems that did not participate in the 7th DWINSA will need 1.5 hours to read these materials. This estimate breaks down as follows:

- A manager will receive the 8th DWINSA, read the cover letter and review the instructions and other materials. The estimated time for managers to perform this role is 30 minutes (0.50 hours).
- Technical staff will read the cover letter and data collection instructions in detail. The EPA estimates that the burden for this activity is 1.0 hour per system.

Thus, the total unit burden is:

$$[0.75 \times (842 + (0.75 \times 215)) / (842 + 215)] + [1.5 \times (0.25 \times 215) / (842 + 215)] = 0.79 \text{ hrs/system}$$

- **Collect and copy supporting documentation.** The time necessary to review system files and to collect and copy supporting documentation will vary greatly. The EPA anticipates that systems that participated in the 7th DWINSA will use much of the same documentation that was collected for the previous DWINSA with limited modifications or updates. Therefore, the EPA estimates that the time for these systems to collect and copy supporting documentation will be reduced. The EPA estimates that it will take 1.0 hour at 50 percent of the systems, 2.0 hours at 25 percent of the systems and 4.0 hours at 25 percent of the systems. Thus, the average time per system is as follows:

$$(1.0 \times 0.5) + (2.0 \times 0.25) + (4.0 \times 0.25) = 2.0 \text{ hrs/system}$$

For systems that did not participate in the 7th DWINSA, the EPA estimates that it will take 1.5 hours at 30 percent of the systems, 2.5 hours at 30 percent of the systems, 4 hours at 30 percent of the systems and 16 hours at 10 percent of the systems. Thus, the average time per system is as follows:

$$(1.5 \times 0.30) + (2.5 \times 0.30) + (4 \times 0.30) + (16 \times 0.10) = 4 \text{ hrs/system}$$

The total average time per system is:

$$[2.0 \times (842 + (0.75 \times 215)) / (842 + 215)] + [4 \times (0.25 \times 215) / (842 + 215)] = 2.10 \text{ hrs/system}$$

The EPA anticipates that half of this time will be spent by technical staff and half will be spent by clerical staff.

- **Call for technical assistance.** Many systems will call states for technical assistance. In developing the burden estimate for this activity, the EPA assumes that the number of requests for assistance will equal 100 percent of the number of systems. (This estimate considers the likelihood that some systems will call more than once, while some will not call at all.) The EPA also assumes that each call will be placed by technical staff.

The EPA anticipates that systems that participated in the 7th DWINSA will need less technical assistance than those that did not participate in the 7th DWINSA. Therefore, the EPA estimates that all questions from systems that participated in the 7th DWINSA will be readily answerable and the state will not need to conduct any additional research and will be able to answer the question during the initial call. That initial call is estimated to average 15 minutes (0.25 hours).

The EPA estimates that the burden for systems that did not participate in the 7th DWINSA break down as follows:

- An estimated 50 percent of the systems are anticipated to have questions that are readily answerable, and the state will not need to conduct any additional research and will be able to answer the question during the initial call that will average 15 minutes (0.25 hours).
- An estimated 50 percent of the systems are anticipated to have questions that will require the state to perform research and call the system back. In this case, the EPA estimates that the total burden for the two calls is 25 minutes (0.42 hours).

$$[(0.25 \times 0.50) + (0.42 \times 0.50)] = 0.34 \text{ hrs/system}$$

The total average burden per system is:

$$[0.25 \times (842 + (0.75 \times 215)) / (786 + 251)] + [0.34 \times (0.25 \times 215) / (842 + 251)] = 0.25 \text{ hrs/system}$$

- **Complete data collection instrument.** The burden to systems to complete the data collection instrument will vary depending on whether the system participated in the 7th DWINSA. The 7th DWINSA participants will have a relatively low burden because the EPA expects that a large portion of the information in the 7th DWINSA will carry over to the 8th DWINSA. Thus, with the exception of the supplemental questions, 7th DWINSA participants will only update their needs and documentation rather than identify all their needs anew.

With the exception of the supplemental questions, the EPA estimates that technical staff at systems that participated in the 7th DWINSA will need 2.0 hours to update the survey and complete the project table of the data collection instrument. The EPA estimates that technical staff at systems that did not participate in the 7th DWINSA will take 3.0 hours to complete the project table of the data collection instrument. This estimate is consistent with the EPA's

experience with the previous DWINSAs. The total time burden for technical staff is estimated to be:

$$[2 \times (842 + (0.75 \times 215)) / (842 + 215)] + [3 \times (0.25 \times 215) / (842 + 215)] = 2.05 \text{ hrs/system}$$

Management is expected to take 18 minutes (0.30 hours) to review the completed data collection instrument for accuracy and submit the data collection instrument and supporting documentation electronically.

All systems will receive the supplemental questions for the first time. The EPA estimates that Management will take 5 minutes per question to answer questions 1-7. The three managerial, financial, and technical capability questions (questions 8-10) are expected to take about 7 minutes each. The EPA expects questions 11-15 to take 5 minutes each. Thus, all questions are expected to take 81 minutes, 1.35 hours total, and the total time burden for management is estimated to be:

$$(0.3 + 1.35) = 1.65 \text{ hrs/system.}$$

Clerical staff is anticipated to take 18 minutes (0.3 hours) to provide support to the technical staff at water systems that participated in the 7th DWINSA and 1.0 hour at water systems that did not participate in the 7th DWINSA. The total time burden for clerical staff is estimated to be:

$$[0.3 \times (842 + (0.75 \times 215)) / (842 + 215)] + [1 \times (0.25 \times 215) / (842 + 215)] = 0.34 \text{ hrs/system}$$

The total average burden per system is as follows:

$$1.65 + 2.05 + 0.34 = 4.04 \text{ hrs/system}$$

- **Respond to call back from state about status of 8th DWINSA.** For this burden estimate, the EPA assumes each system will spend time responding to the state call(s) to request a status update on completing the data collection instrument. The EPA assumes that the average total time spent by each system on responding to the state call(s) is 15 minutes (0.25 hours) per system. This does not include discussing technical questions, which is accounted for above. Rather, it includes time needed for the system to provide the state with a brief report on the status of the 8th DWINSA response.

Exhibit A - 3: Estimated Average Unit Burden for Systems Serving More Than 50,000 Persons

Activity	Estimated Burden (hours)			
	Management	Technical	Clerical	Total
Participate in informational phone call	0.13	0.13		0.25
Read cover letter/data collection instructions	0.26	0.53		0.79
Collect supporting documentation		1.05	1.05	2.10
Call for technical assistance		0.26		0.26
Complete data collection instrument	1.65	2.05	0.34	4.04
Respond to call back from state		0.25		0.25

Activity	Estimated Burden (hours)			
TOTAL	2.04	4.26	1.39	7.69

Note: Numbers may not add due to rounding.

CWSs Serving 3,301 to 50,000 Persons in Full Participation States

Exhibit A - 4 shows the unit burden for 767 systems serving 3,301 to 50,000 persons. The EPA estimates that each of these systems will take a total of 6.44 hours to respond to the 8th DWINSA.

- **Participate in informational phone call.** All systems will participate in an informational phone call with the state. On this call, the state will inform respondents about the upcoming DWINSA, describe the purpose of the DWINSA, and explain how respondents will receive and submit the data collection instrument. The state will also describe the information that will be requested and the timetable for completing and returning the data collection instrument. For systems that participated in the 7th DWINSA, each informational call should last about 15 minutes (0.25 hours).

The EPA anticipates that systems that did not participate in the 7th DWINSA will need more time on the phone call to understand the process. Each informational call should last about 20 minutes (0.33 hours).

Consequently, the average burden per system is as follows:

$$[(0.25 \times 0.75) + (0.33 \times 0.25)] = 0.27 \text{ hrs/system}$$

The EPA anticipates that management staff will take the call at half of the systems and technical staff will take the call at the other half.

- **Read cover letter.** The EPA anticipates that systems that participated in the 7th DWINSA will need less time to read the cover letter and data collection instructions because they will already be familiar with the process and will only need to become familiar with aspects of the survey that have changed. The EPA estimates that the burden for each of these systems is 45 minutes (0.75 hours) and breaks down as follows:

A manager will receive the 8th DWINSA, read the cover letter and review the instructions and other materials. The estimated time for managers to review these items is 15 minutes (0.25 hours).

Technical staff will read the cover letter and data collection instructions in detail. The EPA estimates that the burden for this activity is 30 minutes (0.50 hours) per system.

The EPA estimates that systems that did not participate in the 7th DWINSA will need 1.5 hours to read these materials. This estimate breaks down as follows:

- A manager will receive the 8th DWINSA, read the cover letter and review the instructions and other materials. The estimated time for managers to review the cover letter is 30 minutes (0.50 hours).

- Technical staff will read the cover letter and data collection instructions in detail. The EPA estimates that the burden for this activity is 1.0 hour per system.

Thus, the total unit burden is:

$$[(0.75 \times 0.75) + (1.5 \times 0.25)] = 0.94 \text{ hrs/system}$$

- **Collect and copy supporting documentation.** The time necessary to review system files and to collect and copy supporting documentation will vary greatly. For instance, systems serving 3,301 to 50,000 persons typically have less documentation than larger systems. Furthermore, the EPA anticipates that systems that participated in the 7th DWINSA will use much of the same documentation that was collected and prepared for the previous DWINSA with limited modifications or updates. Therefore, the EPA estimates that the time for these systems to collect and copy supporting documentation will be reduced from previous years. The EPA estimates that it will take approximately 45 minutes (0.75 hours) at 40 percent of these systems, 1.5 hours at 40 percent of these systems, and 3.0 hours at 20 percent of these systems. Thus, the average time per system that participated in the 7th DWINSA is as follows:

$$[(0.75 \times 0.40) + (1.5 \times 0.40) + (3 \times 0.20)] = 1.5 \text{ hrs/system}$$

For systems that did not participate in the 7th DWINSA, the EPA estimates that it will take 1.0 hour at 50 percent of the systems, 2.0 hours at 25 percent of the systems, and 4.0 hours at 25 percent of the systems. Thus, the average time per system is as follows:

$$[(1.0 \times 0.5) + (2.0 \times 0.25) + (4.0 \times 0.25)] = 2.0 \text{ hrs/system}$$

The total average time per system is:

$$[(1.5 \times 0.75) + (2.0 \times 0.25)] = 1.63 \text{ hrs/system}$$

The EPA anticipates that half of this time will be spent by technical staff and half will be spent by clerical staff.

- **Call for technical assistance.** Many systems will call states for technical assistance. In developing the burden estimate for this activity, the EPA assumes that the number of requests for assistance will equal 150 percent of the number of systems. (This estimate accounts for the fact that some systems will call more than once, while some will not call at all.) The EPA also assumes that each call will be placed by technical staff.

The EPA anticipates that systems that participated in the 7th DWINSA will need less technical assistance than those that did not participate in the 7th DWINSA. Therefore, the EPA estimates that all questions from systems that participated in the 7th DWINSA will be readily answerable and the state will not need to conduct any additional research and will be able to answer the question during the initial call. That initial call is estimated to average 15 minutes (0.25 hours).

The EPA estimates that the burden for systems that did not participate in the 7th DWINSA breaks down as follows:

- About 50 percent of the systems are anticipated to have questions that will be readily answerable and the state will not need to conduct any additional research and will be

able to answer the question during the initial call that will average 15 minutes (0.25 hours).

- About 50 percent of the systems are anticipated to have questions that will need the state to perform research and call the system back. In this case, the EPA estimates that the total burden for the two calls is 25 minutes (0.42 hours).

$$[(0.25 \times 0.50) + (0.42 \times 0.50)] = 0.34 \text{ hrs/system}$$

The total average burden per system is:

$$1.50 \times [(0.25 \times 0.75) + (0.34 \times 0.25)] = 0.41 \text{ hrs/system}$$

- **Complete data collection instrument.** The burden to systems to complete the data collection instrument will vary depending on whether the system participated in the 7th DWINSA. The 7th DWINSA participants will have a relatively low burden because the EPA expects that a large portion of the information in the 7th DWINSA will carry over to the 8th DWINSA. Consequently, 7th DWINSA participants will only update their needs and documentation rather than identify all their needs anew.

The EPA estimates that technical staff at systems that participated in the 7th DWINSA will need 1.0 hour to update the previous survey and complete the project table of the data collection instrument. Technical staff at systems that did not participate in the 7th DWINSA are expected to take 2.0 hours to complete the data collection instrument. This estimate is consistent with the EPA's experience with the previous DWINSAs. Thus, the total time burden for technical staff is estimated to be:

$$(1 \times 0.75) + (2 \times 0.25) = 1.25 \text{ hrs/system}$$

The EPA estimates that management staff at systems that participated in the 7th DWINSA will need 18 minutes (0.30 hours) to review the completed data collection instrument for accuracy and submit the data collection instrument and supporting documentation electronically. Management staff at systems that did not participate in the 7th DWINSA are expected to take 28 minutes (0.47 hours) to review the completed data collection instrument for accuracy and submit the data collection instrument and supporting documentation electronically.

All systems will receive the supplemental questions for the first time. The EPA estimates that management staff will take 5 minutes per question to answer questions 1-4, 8-15. The three managerial, financial, and technical capability questions (questions 5-7) are expected to take about 7 minutes each. Thus, all questions are expected to take 81 minutes, 1.35 hours total, and the total time burden for management is estimated to be:

$$[(0.3 \times 0.75) + (0.47 \times 0.25)] + (1.35) = 1.69 \text{ hrs.}$$

Thus, the total unit burden to systems that participated in the 7th DWINSA is approximately:

$$1 + 0.30 + 1.35 = 2.65 \text{ hrs/system}$$

The total unit burden to systems that did not participate in the 7th DWINSA is approximately:

$$2 + 0.47 + 1.35 = 3.82 \text{ hrs/system}$$

The total average burden per system is as follows:

$$(2.65 \times 0.75) + (3.82 \times 0.25) = 2.94 \text{ hrs/system}$$

- **Respond to call back from state about status of 8th DWINSA.** For this burden estimate, the EPA assumes each system will spend time responding to the state call(s) to request a status update on completing the survey's data collection instrument. The EPA assumes that the average total time spent by each system on responding to the state call(s) is 15 minutes (0.25 hours) per system. This does not include discussing technical questions, which is accounted for above. Rather, it includes time necessary to provide the state with a brief report on the status of the 8th DWINSA response.

Exhibit A - 4: Estimated Average Unit Burden for Systems Serving 3,301 to 50,000 Persons

Activity	Estimated Burden (hours)			
	Management	Technical	Clerical	Total
Participate in informational phone call	0.14	0.14		0.27
Read cover letter/data collection instructions	0.31	0.63		0.94
Collect supporting documentation		0.81	0.81	1.63
Call for technical assistance		0.41		0.41
Complete data collection instrument	1.69	1.25		2.94
Respond to call back from state		0.25		0.25
TOTAL	2.14	3.49	0.81	6.44

Note: Numbers may not add due to rounding.

CWSs Serving 3,300 and Fewer Persons

Exhibit A - 5 shows the unit burden for the 600 systems serving 3,300 and fewer persons. The EPA estimates that each of these systems will spend a total of 3.35 hours to respond to the 8th DWINSA.

- **Introductory phone call with state.** Respondents will receive a phone call from the state to introduce the data collection effort. The EPA estimates this phone call will take 15 minutes.

$$=0.25 \text{ hrs/system}$$

- **Review 7th DWINSA response data before phone call.** Respondents will review a summary of their 7th DWINSA capital improvement projects and the supplemental questions, provided to

them prior to the phone call. The EPA estimates that systems will each take 30 minutes to review their 7th DWINSA response data.

=0.5 hrs/system

- **Phone call with EPA.** Respondents will discuss the 7th DWINSA response data and provide updates to the capital improvement projects, additional capital improvement needs, and respond to the supplemental questions. The EPA estimates that respondents will spend an hour discussing their 7th DWINSA response data and updates to their capital infrastructure needs.

=1 hr/system

All systems will be asked the supplemental questions for the first time on the call. The EPA estimates that respondents will take 5 minutes per question to answer questions 1-4, and 8-15. The three managerial, financial, and technical capability questions (questions 5-7) are expected to take about 7 minutes each. Thus, all questions are expected to take 81 minutes, 1.35 hours total.

=1.35 hrs/system

The EPA estimates that half of the small system will require a half hour follow-up call to clarify information.

$(0.5 \times 0.5) = 0.25$ hrs/system

The total average burden per system to small systems receiving phone calls is as follows:

$0.25 + 0.5 + 1 + 1.35 + 0.25 = 3.35$ hrs/system

Exhibit A - 5: Estimated Average Unit Burden for Systems Serving Less than 3,301 Persons

Activity	Estimated Burden (hours)			
	Management	Technical	Clerical	Total
Introductory phone call with state	0	0.25	0	0.25
Review 7th DWINSA response data before phone call	0	0.5	0	0.5
Phone call with EPA	0	2.60	0	2.60
TOTAL	0	3.35	0	3.35

CWSs Serving 3,301 to 100,000 Persons in Partial Participation States

The supplemental questions will be provided to 311 medium systems serving 3,301 to 100,000 persons in partial participation states. The EPA estimates that the unit burden to these systems will be 1.35

hours. Exhibit A - 6 shows the unit burden for systems serving 3,301-100,000 persons in partial participation states.

- **Complete data collection for supplemental questions.** All systems will receive the supplemental questions for the first time. The EPA estimates that Management will take 5 minutes per question to answer questions 1-4 and 8-15. The three managerial, financial, and technical capability questions (questions 5-7) are expected to take about 7 minutes each. Thus, all questions are expected to take 81 minutes, 1.35 hours total, and the total time burden for management is estimated to be:

$$= 1.35 \text{ hrs/system}$$

Exhibit A - 6: Estimated Average Unit Burden for Systems Serving 3,301-100,000 Persons in Partial Participation States

Activity	Estimated Burden (hours)			
	Management	Technical	Clerical	Total
Phone call with state to answer questions	1.35	0	0	1.35
TOTAL	1.35	0	0	1.35

Note: Numbers may not add due to rounding.

American Indian and Alaska Native Village Utilities

The AI and ANV supplemental questions will be provided to 147 AI and ANV utilities. The EPA estimates that the unit burden to these utilities will be 2.53 hours. Exhibit A - 7 shows the unit burden for AI and ANV utilities.

- **Informational telephone call from the EPA Regional Office.** Utilities will receive a phone call from their EPA Regional offices to introduce the survey and facilitate data collection. The EPA expects the informational portion of the phone call will be 5 minutes (0.08 hours).
- **Answer supplemental questions posed by the EPA Regional Office.** Utilities will answer the supplemental questions posed by their EPA Regional offices. The EPA expects it will take approximately 7 minutes (0.117 minutes) per question, with a total of 21 questions. Thus, the total average burden per utility is as follows:

$$0.08 + [0.117 \times 21] = 2.53 \text{ hrs/utility}$$

Exhibit A - 7: Estimated Average Unit Burden for American Indian and Alaska Native Village Utilities

Activity	Estimated Burden (hours)		
	Management	Technical	Total
Informational telephone call from the EPA Regional Office	0	0.08	0.08
Phone call with EPA Region to answer questions	0	2.45	2.45
TOTAL	0	2.53	2.53

Note: Numbers may not add due to rounding.

Stakeholder Engagement

Small System Representatives & Water Industry Representatives

- **Prepare for meeting.** Stakeholders will spend approximately 1 hour preparing for the meeting. Stakeholders may use this time to send EPA information.
- **Attend meeting.** Stakeholders will spend approximately 3 hours attending the meeting.
- **Answer follow-up questions.** Stakeholders will spend approximately 1 hour answering follow-up questions and providing EPA with information.
- **Provide feedback.** Stakeholders spend approximately 1 hour providing feedback on the meeting, to include additional information. Thus, the total average burden per stakeholder is as follows:

$$(1+3+1+1) = 6 \text{ hrs/attendee}$$

Exhibit A - 8 shows the unit burden for the 37 key stakeholders attending the engagement discussions at six hours.

Exhibit A - 8: Estimated Average Unit Burden for Key Stakeholders Attending Engagement Meeting

Activity	Estimated Burden (hours)
Prepare for meeting	1
Attend In-Person meeting	3
Answer follow-up questions	1
Provide feedback	1

Activity	Estimated Burden (hours)
TOTAL	6

Burden to Primacy Agencies

As previously discussed, all states have committed to help the EPA administer the 8th DWINSA with at least the minimum of activities. The majority of states that are expected to opt out of the statistical portion of the survey have systems serving more than 100,000 persons that will receive the capital investment 20-year infrastructure need survey and the supplemental questions. In addition, the supplemental questions will be sent to medium systems in these partial participation states, so these medium systems will be selected as part of the statistical sample. Therefore, the partial participation states would participate in the data collection phase of the 8th DWINSA.

Up-Front Burden

This activity category includes the “fixed burden” for states to help the EPA prepare for the 8th DWINSA. The total burden for these activities is 110 hours per state. summarizes this burden.

- **Participate in technical assistance and other pre-survey efforts.** The burden for this activity is estimated at 80 hours per primacy agency.
- **Assist the EPA with verification of SDWIS data.** Based on past experience, the EPA estimates that verifying SDWIS data for systems in the sample will require approximately 12 minutes (0.2 hours) per system.
- **Perform miscellaneous administrative activities.** The burden for these activities is estimated at 30 hours per primacy agency.

Exhibit A - 9: State Unit Burden for Up-Front Activities

Activity	Estimated Burden	Activity
	Hours/state	Hours/system
Participate in pre-survey technical assistance and other pre-survey activities	80 hours/state	
Data Frame Validation		0.2 hours/system
Perform miscellaneous administrative activities	30 hours/state	
TOTAL	110 hours/state	0.2 hours/system

Navajo Nation Up-Front Burden

As a utility receiving the supplemental questions, the Navajo Nation does not have a similar role in administering surveys to water systems as it did in the 7th DWINSA. The Navajo Nation will complete the

supplemental questions itself as a utility, rather than helping facilitate survey responses for individual CWSs within the utility.

State Burden for CWSs Serving More Than 50,000 Persons in Full Participation States

This section estimates the state burden for helping the EPA conduct the 8th DWINSA for systems serving more than 50,000 persons by providing technical assistance where needed, working with systems to identify their needs, calling systems that do not return the data collection instrument on time, reviewing the completed data collection instrument and documentation, and discussing the results with the EPA. Although most of these systems will be able to answer the questions on the data collection instrument, states will provide them with clarifying information as necessary. The state burden for activities associated with the systems serving more than 50,000 persons is summarized in Exhibit A - 10 which follows the activity descriptions.

- **Telephone systems to ensure participation and provide instructions.** The EPA estimates that this preliminary phone call will take about 15 minutes (0.25 hours) per system that participated in the 7th DWINSA and about 20 minutes (0.33 hours) per system that did not participate in the 7th DWINSA. Thus, the average burden to states for each system is as follows:

$$[0.25 \times (842 + (0.75 \times 215)) / (842 + 215)] + [0.33 \times (0.25 \times 215) / (842 + 215)] = 0.25 \text{ hrs/system}$$

- **E-mail survey package to systems.** Each state will send the survey packet (provided by the EPA) to systems via e-mail. The EPA estimates that states will spend a total of 30 minutes drafting text for two e-mails: one to systems that participated in the 7th DWINSA and one to systems that did not participate in the 7th DWINSA. This amounts to approximately 0.03 minutes (0.0005 hours) per system (0.5 hours / 1,057 systems). The EPA anticipates that states will spend approximately 5 minutes (0.08 hours) compiling each e-mail, including addressing the e-mail to the correct recipient and attaching the correct files. The EPA also estimates that approximately 10 percent of these e-mails will be returned to the states and states will need an additional 5 minutes (0.083 hours) to locate the correct recipient and resend the e-mail. Thus, the average burden to states for each system is as follows:

$$[0.0005 + 0.08 + (0.10 \times 0.08)] = 0.09 \text{ hrs/system}$$

- **Provide technical assistance.** In developing a burden estimate for this analysis, the EPA assumes that the number of requests for technical assistance will equal 100 percent of the number of systems. (This estimate considers that some systems will call more than once while some will not call at all.)

The EPA anticipates that systems that participated in the 7th DWINSA will need less technical assistance than those that did not participate in the 7th DWINSA. Therefore, the EPA estimates that all questions from these systems will be readily answerable, requiring only 15 minutes (0.25 hours) to answer.

The EPA estimates that the burden to assist systems that did not participate in the 7th DWINSA is 30 minutes (0.5 hours) and breaks down as follows:

- Of those that do need technical assistance, about 50 percent of their questions will be readily answerable, requiring only 15 minutes (0.25 hours) to answer.

- About 25 percent of their questions will entail limited research and follow-up, requiring 30 minutes (0.50 hours) to answer, including time to call the EPA with questions.
- About 25 percent of their questions will need the state to perform some research and will need 1.0 hour to answer.

Therefore, the state burden for providing technical assistance is estimated as:

$$[0.25 \times (842 + (0.75 \times 215)) / (786 + 215)] + [0.5 \times (0.25 \times 215) / (842 + 215)] = 0.26 \text{ hrs/system}$$

- **Call back systems that do not provide information for the data collection instrument by a certain date.** The EPA assumes that the number of these “reminder” calls will equal 100 percent of the systems. This assumes that most (but not all) will need at least one reminder call and a few will need two or three. The average time for these calls is 20 minutes (0.33 hours) per system. This estimate includes the time to find the contact information and call the system as well as time to talk to the technical staff. This does not include answering technical questions, which is accounted for above. Rather, it includes locating the correct contact person and obtaining a brief report on the status of the 8th DWINSA response.
- **Review completed data collection instruments and documentation.** The data collection instrument will be returned directly to the state for review. For some systems, the documentation is expected to be quite voluminous and reviewing it will be the most burdensome part of the 8th DWINSA. The time necessary for this review is difficult to estimate.

States may generate their own documentation for the 8th DWINSA and, if they add distribution or transmission projects, they are to also ensure that the total pipe field on the 8th DWINSA is completed.

For the 8th DWINSA, the burden to states to review the data collection instrument for each system will vary depending on whether the system participated in the 7th DWINSA. Based on discussions with the states concerning their level of effort in previous assessments and based on the estimates for systems to complete the survey in previous assessments, the EPA estimates that, on average, states will take 3.5 hours to review the submission for each system that participated in the 7th DWINSA. This estimate is consistent with the EPA’s finding in the 7th DWINSA that states needed less time to review a data collection instrument completed by a system that had participated in the 6th DWINSA compared to the time needed to review a newly developed data collection instrument.

For systems that did not participate in the 7th DWINSA, the EPA estimates that a total of 5.0 hours will be necessary for the state to review each data collection instrument.

Thus, the average burden to states for each system is as follows:

$$[3.5 \times (842 + (0.75 \times 215)) / (842 + 215)] + [5 \times (0.25 \times 215) / (842 + 215)] = 3.58 \text{ hrs/system}$$

- **Discuss results with the EPA.** To estimate the state burden for resolving questions on the completed data collection instruments, the EPA made the following assumptions:
 - The EPA will have questions for the state on 50 percent of the completed data collection instruments. Some of these questions will apply to all systems.

- Each question will take the state 1.0 hour to resolve.

Thus, the average burden to states for each system is as follows:

$$[0.5 \times 1] = 0.50 \text{ hrs/system}$$

Exhibit A - 10: State Unit Burden for Systems Serving More Than 50,000 Persons

Activity	Estimated Burden (hours per system)
Call to ensure participation	0.25
E-mail surveys to systems	0.09
Provide Technical Assistance	0.26
Call back systems that do not return the data collection instrument by a certain date	0.33
Review completed assessment forms and documentation	3.58
Discuss results with the EPA	0.50
TOTAL	5.01

Note: Numbers may not add due to rounding.

State Burden for CWSs Serving 3,301 to 50,000 Persons in Full Participation States

This section estimates the state burden for helping the EPA conduct the 8th DWINSA for systems serving 3,301 to 50,000 persons by telephoning systems to ensure participation, calling back systems that did not return the data collection instrument on time, reviewing the completed data collection instrument and the accompanying documentation, and discussing the results with the EPA. The state burden for activities associated with systems serving 3,301 to 50,000 persons is summarized in Exhibit A - 11, which follows the activity descriptions.

- **Telephone systems to ensure participation.** The EPA estimates that this preliminary phone call will take about 15 minutes (0.25 hours) per system that participated in the 7th DWINSA and about 20 minutes (0.33 hours) per system that did not participate in the 7th DWINSA. Thus, the average burden to states for each system is as follows:

$$[(0.25 \times 0.75) + (0.33 \times 0.25)] = 0.27 \text{ hrs/system}$$
- **E-mail survey package to systems.** Each state will send the survey packet (provided by the EPA) to systems via e-mail. The EPA estimates that states will spend a total of 30 minutes drafting text for two e-mails: one to systems that participated in the 7th DWINSA and one to systems that did not participate in the 7th DWINSA. This amounts to approximately 0.02 minutes (0.00033 hours) per system (0.5 hours / 767 systems). The EPA anticipates that states will spend approximately 5 minutes (0.083 hours) compiling each e-mail, including addressing the e-mail to the correct recipient and attaching the correct files. The EPA also estimates that approximately 10 percent of these e-mails will be returned to the states and states will need an additional 5 minutes

(0.083 hours) to locate the correct recipient and resend the e-mail. Thus, the average burden to states for each system is as follows:

$$[0.00033 + 0.083 + (0.10 \times 0.083)] = 0.09 \text{ hrs/system}$$

- **Provide technical assistance.** In developing a burden estimate for this analysis, the EPA assumes that the number of requests for technical assistance will equal 150 percent of the number of systems. (This estimate accounts for the fact that some systems will call more than once while some will not call at all.)

The EPA anticipates that systems that participated in the 7th DWINSA will need less technical assistance than those that did not participate in the 7th DWINSA. Therefore, the EPA estimates that all questions from these systems will be readily answerable, requiring only 15 minutes (0.25 hours) to answer.

The EPA estimates that the burden to assist systems that did not participate in the 7th DWINSA is 30 minutes (0.5 hours) and breaks down as follows:

- Of those that do need technical assistance, about 50 percent of their questions will be readily answerable, requiring only 15 minutes (0.25 hours) to answer.
- About 25 percent of their questions will entail limited research and follow-up, requiring 30 minutes (0.50 hours) to answer, including time to call the EPA with questions.
- About 25 percent of their questions will need the state to perform some research and will need 1.0 hour to answer.

Therefore, the state burden for providing technical assistance is estimated as:

$$1.5 \times [(0.25 \times 0.75) + (0.5 \times 0.25)] = 0.47 \text{ hrs/system}$$

- **Call back systems that do not return the data collection instrument by a certain date.** It is assumed that the number of these “reminder” calls will equal 150 percent of the systems. This assumes that most (but not all) will need at least one reminder call and some will need two or possibly three. The average time for these calls is 20 minutes (0.33 hours) per system. This does not include answering technical questions, which is accounted for above. Rather, it includes locating the correct contact person and obtaining a brief report on the status of the 8th DWINSA response. Thus, the average burden per system is as follows:

$$[1.5 \times 0.33] = 0.50 \text{ hrs/system}$$

- **Review completed data collection instruments and documentation.** The data collection instrument will be returned directly to the state for review. For some systems, the documentation is expected to be quite voluminous and reviewing it will be the most burdensome part of the 8th DWINSA. The time necessary for this review is difficult to estimate. States may generate their own documentation for the 8th DWINSA and, if they add distribution or transmission projects, are to also ensure that the total pipe field on the 8th DWINSA is completed.

For the 8th DWINSA, the burden to states to review the data collection instrument for each system will vary depending on whether the system participated in the 7th DWINSA. Based on discussions with the states concerning their level of effort in previous assessments and based on the estimates for systems to complete the survey in previous assessments, the EPA estimates that, on average, states will take 3.0 hours to review the submission for each system that participated in the 7th DWINSA. This estimate is consistent with the EPA's finding in the 7th DWINSA that states needed less time to review a data collection instrument completed by a system that had participated in the 7th DWINSA compared to the time needed to review a newly developed data collection instrument.

For systems that did not participate in the 7th DWINSA, the EPA estimates that a total of 4.25 hours will be needed for the state to review each data collection instrument.

Thus, the average burden to states for each system is as follows:

$$[(3 \times 0.75) + (4.25 \times 0.25)] = 3.31 \text{ hrs/system}$$

- **Discuss results with the EPA.** To estimate the state burden for resolving questions on completed data collection instruments, the EPA made the following assumptions:
 - The EPA will have questions for the state on 50 percent of the completed data collection instruments. Some of these questions will apply to all systems.
 - Each question will take the state one hour to resolve.

Thus, the average burden to states for each system is as follows:

$$[0.5 \times 1] = 0.50 \text{ hrs/system}$$

Exhibit A - 11: Estimated State Average Unit Burden for Systems Serving 3,301 to 50,000 Persons

Activity	Estimated Burden (hours per system)
Telephone systems to ensure participation	0.27
E-mail surveys to systems	0.09
Provide technical assistance	0.47
Call back systems that do not return the data collection instrument by a certain date	0.50
Review completed data collection instruments and documentation	3.31
Discuss results with the EPA	0.50
TOTAL	5.14

Note: Numbers may not add due to rounding.

State Burden for CWSs Serving 3,300 and Fewer Persons

- **Call systems to introduce data collection effort.** Each state will call respondents to inform them about upcoming phone calls from the EPA. The EPA estimates this phone call will take 15 minutes. This is summarized in Exhibit A - 12

=0.25 hrs/system

Exhibit A - 12: State Unit Burden for CWSs Serving 3,300 and Fewer Persons

Activity	Estimated Burden (hours per system)
Call systems to introduce data collection effort	0.25
TOTAL	0.25

State Burden for CWSs Serving 3,301 to 100,000 Persons in Partial Participation States

This section estimates state burden for partial participation states collecting data for the supplemental questions. The partial participation state burden for CWSs serving 3,301 – 100,000 is summarized in Exhibit A - 13, which follows the activity descriptions.

- **E-mail the data collection instrument to systems.** Each state will inform respondents about the upcoming DWINSA and their selection to provide information on supplemental questions (provided by the EPA), but not on 20-year infrastructure needs. States will inform systems via e-mail. The state will also explain how responses to the questions will be collected via email of the completed form. The EPA anticipates that states will spend approximately 5 minutes (0.08 hours) compiling each e-mail, including addressing the e-mail to the correct recipient and attaching the correct files. The EPA also estimates that approximately 10 percent of these e-mails will be returned to the states and states will need an additional 5 minutes (0.08 hours) to locate the correct recipient and resend the e-mail. Thus, the average burden to states to send the data collection instrument is:

$$0.08 + (0.08 \times 0.1) = 0.09 \text{ hrs/system}$$

- **Phone call to facilitate collection of supplemental question data.** States should take about 15 minutes (0.25 hours) per system to discuss the supplemental question responses from individual systems, review the responses, and then submit to the EPA. Thus, the average burden to states to facilitate responses to supplemental questions is as follows:

$$0.09 + 0.25 = 0.34 \text{ hrs/system}$$

Exhibit A - 13: Partial Participation State Unit Burden for CWSs Serving 3,301-100,000 Persons

Activity	Estimated Burden (hours per system)
E-mail the data collection instrument to systems	0.09
Phone call to facilitate collection of supplemental question data	0.25
TOTAL	0.34

Note: Numbers may not add due to rounding.

Navajo Nation Burden

As a utility receiving the O&M questions, the Navajo Nation does not have a similar role in administering surveys to water systems as it did in previous DWINSAs.

Respondent Costs**Costs to CWSs**

Exhibit A - 14 summarizes the burden and costs to CWSs in fully participating states. Total costs to these systems are estimated at \$831,341, which consists solely of labor costs. There are no operation and maintenance (O&M) costs or capital costs associated with the collection.

CWS labor costs are based on the number of burden hours multiplied by the average hourly wage rate, including overhead. The average hourly wage rate is the rate taken from a 2003 EPA document titled Labor Costs for National Drinking Water Rules. The quoted rate is \$26.05 in 2003 dollars for systems serving 50,000 or fewer persons and \$31.26 in 2003 dollars for systems serving more than 50,000 persons. This rate has been inflated to 2025 dollars using the Employment Cost Index (ECI) reported in the most recent US Bureau of Labor Statistics ECI report¹. The inflated rate is \$49.78 for systems serving 50,000 or fewer persons and \$59.74 for systems serving more than 50,000 persons.

Exhibit A - 14: Total Burden and Cost to Fully Participating Community Water Systems (2025\$)

Respondent	Average Unit Burden (hours)				Total Responses	Total Hours	Hourly Rate	Total Cost
	Management	Technical	Clerical	Subtotal				

¹ See Table 1: Total Compensation - Dec 2025 - Private Industry; Trade, Transportation, and Utilities (<https://www.bls.gov/news.release/eci.htm>).

	Average Unit Burden (hours)							
Respondent					Total Responses	Total Hours	Hourly Rate	Total Cost
Systems Serving More Than 50,000 Persons	2.04	4.26	1.39	7.69	1,057	8,128	\$59.74	\$485,586
Systems Serving 3,301 – 50,000 Persons	2.14	3.49	0.81	6.44	767	4,936	\$49.78	\$245,697
Systems Serving 3,300 and Fewer Persons	0	3.35	0	3.35	600	2,010	\$49.78	\$100,058
TOTAL	n/a	n/a	n/a	6.22	2,424	15,074	\$55.15	\$831,341

Note: Numbers may not add due to rounding.

The average burden per system response is 6.22 hours (15,074/2,424).

Total hourly rate of \$55.15 reflects the overall average hourly rate (\$831,341/15,074).

Cost to Medium Water Systems in Partial Participation States

Error: Reference source not found summarizes the burden and costs to systems serving 3,301-100,000 persons in partial participation states. Total costs are estimated at \$21,326, which consists solely of labor costs. There are no O&M costs or capital costs associated with the collection.

Exhibit A - 15: Total Burden and Cost to Medium Water Systems in Partial Participation States (2025\$)

Respondent	Average Unit Burden (hours)				Total Responses	Total Hours	Hourly Rate	Total Cost
	Management	Technical	Clerical	Subtotal				
Systems Serving 50,001-100,000 Persons	1.35	0.00	0.00	1.35	31	42	\$59.74	\$2,509
Systems Serving 3,301 – 50,000 Persons	1.35	0.00	0.00	1.35	280	378	\$49.78	\$18,817
TOTAL	n/a	n/a	n/a	1.35	311	420	\$50.78	\$21,326

Note: The average burden per system response is 1.35 hours (420/311).

Numbers may not add due to rounding.

Total hourly rate of \$50.78 reflects the overall average hourly rate (\$21,326/420).

Cost to Small System Stakeholder Engagement Meeting Attendees

Exhibit A - 16 summarizes the burden and costs to small system key stakeholders. Total costs are estimated at \$15,969, which consists solely of labor costs. There are no O&M costs or capital costs associated with the collection.

Exhibit A - 16: Total Burden and Cost to Stakeholder Meeting Attendees (2025\$) Respondent	Average Unit Burden (hours)	Total Responses	Total Hours	Hourly Rate	Total Cost
Small System Representatives	6	25	150	\$49.78	\$7,467
Water Industry Representatives	6	12	72	\$118.09	\$8,502
TOTAL	6	37	222	\$71.93	\$15,969

Note: Numbers may not add due to rounding.

The average burden per attendee is 6 hours (222/37).

Total hourly rate of \$71.93 reflects the overall average hourly rate (\$15,969/222).

Cost to American Indian and Alaska Native Village Utilities

Exhibit A - 17 summarizes the burden and costs to American Indian and Alaska Native Village Utilities. Total costs are estimated at \$18,514, which consists solely of labor costs. There are no O&M costs or capital costs associated with the collection.

Exhibit A - 17: Total Burden and Cost to American Indian and Alaska Native Village Utilities (2025\$)

Respondent	Average Unit Burden (hours)				Total Responses	Total Hours	Hourly Rate	Total Cost
	Management	Technical	Clerical	Subtotal				
American Indian and Alaska Native Village Utilities	0	2.53	0	2.53	147	372	\$49.78	\$18,514
TOTAL	n/a	n/a	n/a	2.53	147	372	\$49.78	\$18,514

Note: Numbers may not add due to rounding.

The average burden per utility response is 2.53 hours (372/147).

Total hourly rate of \$49.78 reflects the overall average hourly rate (\$18,514/372).

Cost to States

Exhibit A - 18 shows the total burden and costs to states. The cost burden for the EPA Regions is discussed in Section 14. Based on the EPA's projection that all states will participate in the DWINSA, the cost to states is \$1,233,903. The labor costs are based on an average full time equivalent (FTE) cost of \$159,016 including overhead, which equates to approximately \$76.45 per hour, when considering an employee is paid for an average of 2,080 hours per year. This rate has been inflated to year 2025 dollars

using the Employment Cost Index (ECI) reported in the most recent US Bureau of Labor Statistics ECI report² and is based on the rates provided by the Association of State Drinking Water Administrators' 2015 Survey of State Drinking Water Programs. This survey provides the most recent estimate of state salaries and FTEs, which were used in the EPA's 2015 State Resource Needs Model.

There are no O&M or capital costs for states under this ICR.

Exhibit A - 18: Total Burden and Cost to States (2025\$)

Activity	Number of States/ Systems	Unit Burden	Total Burden (hours)	Hourly Rate	Total Cost
Up-front	56	110 hours/state	6,160	\$76.45	\$470,932
	2,424	0.2 hours/system	485	\$76.45	\$37,078
State burden for systems serving more than 50,000 persons	1,057	5.01 hours/system	5,296	\$76.45	\$404,879
State burden for systems serving 3,301 – 50,000 persons	767	5.14 hours/system	3,942	\$76.45	\$301,366
State burden for systems serving less than 3,301 persons	600	0.25 hours/system	150	\$76.45	\$11,468
State burden for systems serving 50,001 - 100,000 persons in partial participation states	31	0.34 hours/system	11	\$76.45	\$841
State burden for systems serving 3,301-50,000 persons in partial participation states	280	0.34 hours/system	96	\$76.45	\$7,339
TOTAL			16,140		\$1,233,903

Note: Numbers may not add due to rounding.

Cost to the Navajo Nation

As a utility receiving the supplemental questions, the Navajo Nation does not have a similar role in administering surveys to water systems as it did in the 7th DWINSAs.

Estimating Respondent Universe and Total Burden and Costs

Respondents for this ICR include AI and ANV utilities, CWSs, states, and small system stakeholder engagement meeting attendees (small system representatives and water industry representatives). This ICR estimates that the number of water system/utility respondents is 2,882. In addition to the water system and utility respondents, this ICR assumes 56 states (50 states plus Puerto Rico, the District of Columbia, Northern Mariana Islands, American Samoa, Guam and the U.S. Virgin Islands). In addition to these respondents, key stakeholder engagement will include 25 small system representatives and 12 water industry representatives. Therefore, the total number of respondents is 2,975. The total costs and

² See Table 1: Dec 2025 - State and local government, all workers (<https://www.bls.gov/news.release/eci.htm>)

burden for these respondents are detailed in Exhibit A - 19: Bottom Line Respondent Burden – Water Systems and States (2025\$)

Bottom Line Burden Hours and Costs

Exhibit A - 19 summarizes the bottom-line burden hours and costs for CWSs and states for this collection. The total respondent burden is 32,006 hours at a cost of \$2,105,083.

Exhibit A - 19: Bottom Line Respondent Burden – Water Systems and States (2025\$)

Respondent Type	Burden Hours	Total Cost
Water Systems	15,866	\$871,180
States	16,140	\$1,233,903
TOTAL	32,006	\$2,105,083

Note: Numbers may not add due to rounding.

Exhibit A - 20 summarizes the bottom-line burden hours and costs for the key stakeholder engagement session for this collection. The total burden is 222 hours at a cost of \$15,969.

Exhibit A - 20: Bottom Line Respondent Burden – Stakeholder Engagement (2025\$)

Respondent Type	Burden Hours	Total Cost
Key Stakeholders (Small System & Water Industry Representatives)	222	\$15,969
TOTAL	222	\$15,969

Note: Numbers may not add due to rounding.

It is estimated that the states will conduct survey related activities over two years: the up-front activities in FFY 2025 and data collection activities in FFY 2026. It is estimated that the water systems will provide information to the states for the completion of the data collection instrument in FFY 2026. Over the 3-year ICR period, the average annual burden for all respondents (i.e., states, systems, and stakeholders combined) would be 16,114 hours and the average annual cost would be \$1,060,526 per year, for two years. While the survey effort occurs every four years, the burden on respondents is currently estimated across two years of the three-year ICR period.

Exhibit A - 21 summarizes the estimated annual burden hours and costs for water systems and states across the two years estimated for their participation. Because the Stakeholder Engagement Listening Sessions will occur within one year, the total burden hours and costs are reported separately in .

Exhibit A - 21: Burden Hours and Costs for Respondents per Year (2025\$)

Respondent Type	Total Hour Burden (per year)	Total Cost (per year)
Water systems	7,933	\$435,590
States	8,070	\$616,951
TOTAL	16,003	\$1,052,541
Average per Respondent	5.45	\$358

Note: Numbers may not add due to rounding.

Exhibit A - 22: Burden Hours and Costs for Stakeholder Engagement (2025\$)

Respondent Type	Total Hour Burden	Total Cost
Key Stakeholders (Small System & Water Industry Representatives)	222	\$15,969
TOTAL	222	\$15,969
Average per Respondent	6	\$432

Note: Numbers may not add due to rounding.

Note 2: The figures in this table are not annualized because all burden for small system stakeholder engagement will occur in the first year of data collection.

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.

There are no O&M costs or capital costs associated with this collection.

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

Many of the EPA activities described here will be conducted by contractors with the EPA's oversight/technical direction. For example, the EPA will oversee contractor acceptance of survey submissions and subsequent data analysis. For purposes of describing Agency activities related to the 8th DWINSA, contractor effort is not distinguished from the EPA effort. Separate estimates for contractor burden and cost are provided in Section 14b.

Up-Front Activities

The following pre-assessment activities will be conducted:

- **Revise the data collection instrument.** The EPA revised the data collection instrument based on lessons learned during the previous DWINSAs and state input from a September 2024 Workgroup meeting, and to incorporate supplemental questions. This task will include developing materials for water system use and for state use in supporting water systems.
- **Train state participants.** To ensure that participating state officials understand every aspect of the 8th DWINSA, the EPA plans to conduct five regional technical assistance sessions at locations across the country and/or virtually. Up to an additional five state-specific technical assistance sessions are anticipated based on requests for such technical assistance that have been received by the EPA. The technical assistance will help ensure consistent responses across the country, high response rates, and efficient use of staff.
- **Select 8th DWINSA respondents.** The EPA will also update inventory numbers for water systems based on the information provided from the state reviews. The Agency will select the systems that will be included in the 8th DWINSA.
- **Update data system.** The EPA will update the Web-based data system used for the 7th DWINSA to store and analyze data for the 8th DWINSA. The EPA is creating a new website to house complete survey responses. The website/ data system will also allow the EPA Region and state offices to have view-only access to the data.
- **Send data collection instruments.** This will include prepopulating an electronic data collection instrument with water system inventory information and a list of projects reported in the 7th DWINSA (for systems that participated in the 7th DWINSA). This will also include sending the survey packages via e-mail to the states, copying the EPA Regions. Survey packages will include the prepopulated data collection instrument for each water system selected in the 8th DWINSA, Lists of Codes for the survey, instructions, and a cover letter from the EPA.

Data Collection Activities

The EPA will conduct the following activities during the data collection phase of the 8th DWINSA:

- **Provide technical assistance.** The Agency will provide technical assistance to water systems and states to promote consistent responses across the country.
- **Review completed data collection instruments.** The EPA will review the completed data collection instruments to ensure that all data are documented and allowable.
- **Maintain the data.** The EPA will enter DWINSA data (based on QA review of state submittals) into the data system and perform quality assurance/quality control checks of data entry.
- **Communicate results of review to the state.** The EPA will communicate the results of each survey submittal review to the states via a website that shows the updated project table and comment codes indicating the changes made. The EPA regional staff will also be able to view the data for states in their respective Regions.

14b. Agency Labor Cost

The burden and cost reflect what is directly incurred by EPA Headquarters, Regions, and its contractors and is summarized in Error: Reference source not found. This exhibit distributes burden/costs among all three project years, noting that Agency and contractor activities will vary substantially over the 3-year project period. The Agency's burden is estimated at 44,500 total hours across the project period, which accounts for both governmental staff and contracted staff. The total rounded estimated cost to the government for staff and contractor labor is \$5,500,000. Because the rates across various EPA and contractor staff vary, the aggregated estimate is provided here without reference to a specific hourly rate.

Exhibit A - 23: Estimated Annual and Total Agency Burden and Cost

Activity	Annual		Total	
	Hours	Cost	Hours	Cost
Drafting ICR and Scope Development	2,200	\$250,00	6,600	\$750,000
Data System Development, Technical Assistance, and ICR Approval	2,933	\$426,667	8,800	\$1,280,000
Data Collection and Revise; Data System Operation and User Support, Technical Assistance	8,000	\$920,000	24,000	\$2,760,000
Data Analysis, Drafting the Report to Congress	2,033	\$236,667	6,100	\$710,000
Total	15,167	\$1,833,33	45,500	\$5,500,000

Note: Numbers may not add due to rounding.

Meanwhile, IHS's burden and cost is estimated at 40 hours total for a rounded \$4,250 based on GS-13, Step 5, staff salary and benefits³. Therefore, the government's total burden hours and cost are estimated as shown in Exhibit A-24.

Exhibit A - 24: Estimated Government Total Burden and Cost

Entity	Burden Hours	Total Costs
EPA	44,500	\$5,500,000
IHS	40	\$4,250
TOTAL	44,540	\$5,504,250

Note: Numbers may not add due to rounding.

14c. Agency Non-Labor Costs

All costs estimated here are associated with labor.

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.

This ICR does not modify an existing ICR. An ICR was prepared for the previous survey effort done in 2020 (OMB control number 2040-0302; EPA ICR No. 2616.01), which is outside of the 3-year window for modifying an existing ICR for a new effort. For purposes of this ICR, the EPA has provided a comparison of burden of the proposed new effort to the estimates of the previous 7th DWINSA ICR.

The estimated total public reporting burden over the entire project length of the 7th DWINSA was **43,531** hours, although this burden occurs only during the first two years. The total public reporting burden for the 8th DWINSA is estimated to be **32,228** hours (also occurs only during the first two years), a decrease of 26 percent over the 7th DWINSA. Specific differences between the 7th and 8th DWINSAs that resulted in changes in burden are as follows:

- The 7th DWINSA collected 20-year infrastructure need data from small CWSs, state NPNCWSs, and American Indian and Alaska Native Village water systems. The 8th DWINSA does not collect new data from NPNCWSs, American Indian, and Alaska Native Village water systems, significantly cutting the burden for respondents.
- As described above, the assumed burdens for collecting 20-year infrastructure need information for each large and medium CWS did not change relative to the most recent DWINSA in which these water systems were surveyed. However, the number of medium and large systems in the 8th DWINSA that will be surveyed for 20-year infrastructure needs decreased by 713 systems from 2,537 systems estimated in the 7th DWINSA ICR to 1,824 systems estimated in this ICR for the 8th DWINSA. This results in a lower burden estimate.

³ Hourly rates are from U. S. Office of Personnel Management, 2026 General Schedule (GS) Locality Pay Tables (<http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2026/general-schedule>) and overhead rates are from *Information Collection Request for Public Water Supply Program*, December 20, 1993.

- The 7th DWINSA focused on the 20-year infrastructure needs of the surveyed systems and included supplemental questions. The 8th DWINSA includes new supplemental questions for states and a separate set of supplemental questions for Tribal utilities. These new questions add some burden to participating survey respondents, dependent on the category of the question and the type of respondent.
- The 8th DWINSA will include engagement of key stakeholders to improve the Agency's understanding of the overarching factors that affect small systems' project costs.

16) PUBLICATION OF DATA

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

The Agency intends to publish the aggregated analysis of the 8th DWINSA in a Report to Congress, as mandated by statute in the Safe Drinking Water Act Section 1452(h)(1). Information collected during the 8th DWINSA is releasable under the Freedom of Information Act and may be published on the Agency's website.

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.

The Agency plans to display the expiration date for OMB approval of the information collection on all forms.

18) CERTIFICATION STATEMENT

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

This information collection complies with all provisions of the Certification for Paperwork Reduction Act Submissions.