

## SUPPORTING STATEMENT - PART A

### Corps Water Infrastructure Financing Program (CWIFP) Applications

OMB Control Number 0710-0026

#### Summary of Changes from Previously Approved Collection

- Burden estimates have been increased based on initial round of applications and current Bureau of Labor Statistics data.
- Additionally, the following changes are proposed to Section VII (Key Definitions) of the Final Application (ENG Form 6177):
  - Revise VII(d) “economically disadvantaged community” definition in response to Executive Order 14148 which eliminated the Climate and Economic Justice Screening Tool.
  - Delete VII(r) “treatment works” since the term is not applicable to CWIFP authorities.
  - Update VII(s)(1) “Water Resources Infrastructure Project or Project” to reference the eligibility criteria and requirements as defined in the CWIFP Program Rule, current Notices of Funding Availability (NOFAs), WIFIA statute (33 U.S.C. 3901-3915), and other applicable program guidance. This revision enables the form to maintain accuracy even in the event there are future changes to project eligibility.
  - Add the statement to the beginning of Section VII to enable the information collection form to maintain accuracy even in the event of future changes to definitions: “These definitions may be modified at any time in response to changes in laws, policy, or updated guidance.”

#### 1. Need for the Information Collection

The authority for the U.S. Army Corps of Engineers (USACE) CWIFP is Subtitle C of Title V of the Water Resources Reform and Development Act of 2014 (WRRDA), which is referred to as the Water Infrastructure Finance and Innovation Act of 2014 (WIFIA, see also at 33 U.S.C. 3901–3914). 33 U.S.C. 3904 specifies that entities such as corporations, partnerships, joint ventures, trusts, state infrastructure financing authorities, and tribal, state, or local government entities are eligible to receive federal credit assistance under WIFIA. As described in the associated Final rule (“Credit Assistance and Related Fees for Water Resources Infrastructure Projects,” RIN 0710-AB31) at 33 CFR Part 386, USACE CWIFP involves two sequential collections for eligible entities seeking federal credit assistance: ENG Form 6176, “CWIFP Preliminary Application,” and ENG Form 6177, “CWIFP Application” (hereafter referred to as the “Final Application”). The Preliminary Application collection is required to validate the eligibility of the prospective borrower and the proposed project, perform a preliminary creditworthiness assessment, perform a preliminary engineering and environmental feasibility assessment, and evaluate the project against the selection criteria and identify which projects USACE will invite to submit a Final Application. The Preliminary Application addresses the CWIFP eligibility criteria, CWIFP selection criteria, and identifies other specific information that must be

provided to USACE to be considered for credit assistance. Based on evaluation of the Preliminary Application, USACE will identify those eligible projects which may proceed to closing and invite the prospective borrowers to submit a Final Application. Only those entities who are invited by USACE to submit a Final Application should proceed with the process to submit a Final Application. The Final Application collection is required to provide the information needed to assess the creditworthiness of both the applicant and project, identify the project's engineering and financial risk, negotiate the terms and conditions of the credit assistance, and calculate the amount of budget authority that will be needed to fund the project(s).

## 2. Use of the Information

The respondents to ENG Form 6176 (Preliminary Application) and ENG Form 6177 (Final Application) are eligible entities who are seeking federal credit assistance through CWIFP. Eligible entities include the following: a corporation; partnership; joint venture; trust; State, or local governmental entity, agency, or instrumentality; tribal governments or consortium of tribal governments; or a State infrastructure finance authority.

The information collection process for the Preliminary Application is initiated by the publication in the Federal Register of a CWIFP Notice of Funding Availability (NOFA). As specified in the final CWIFP implementation rule at 33 CFR Part 386, for each fiscal year that Congress appropriates funds for credit assistance, USACE will publish one (or more) NOFA in the Federal Register to solicit Preliminary Applications for credit assistance. USACE also posts each NOFA on the CWIFP website, at <https://www.usace.army.mil/CWIFP/>. The NOFA provides detailed instructions for submitting Preliminary Applications as well as the due dates for submissions. It advises prospective borrowers of the estimated amount of funding available to support CWIFP credit instruments and information required in the application process. The first step requires respondents to submit a Preliminary Application prior to the deadline set out in the NOFA.

Based on evaluation of the Preliminary Applications, the CWIFP program office will determine which projects and applicants are creditworthy and may proceed to closing. Applicants that choose to submit a final application will generally have one year from the time of invitation to do so, and will be required to include an application fee, if applicable. An invitation to submit a final application does not imply an obligation by USACE to enter into a Loan Agreement or Loan Guarantee Agreement.

Respondents should use the CWIFP web-based application system to complete and submit Preliminary and, if invited, Final applications. Respondents can request access to the CWIFP web-based application system at [www.usace.army.mil/cwifp](http://www.usace.army.mil/cwifp). CWIFP staff and support contractors can access Preliminary Applications, Final Applications, and all attachments within the CWIFP web-based application system.

## 3. Use of Information Technology

All (100%) applications are required to be submitted via the CWIFP web-based application system as specified in the latest CWIFP NOFA or other Department of Defense approved electronic means.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. Less Frequent Collection

The collection frequency for the CWIFP Preliminary Application is “On Occasion,” because it is tied to congressional appropriations. In general, appropriations for the CWIFP are anticipated to occur only once annually; however, in some years a supplemental appropriation may result in issuance of an additional NOFA which would initiate a new opportunity for prospective borrowers to submit Preliminary Applications. The collection frequency for CWIFP Final Application is also “On Occasion,” because it is conditional upon the applicant receiving an invitation to apply that USACE may provide after review of their Preliminary Application.

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Wednesday, March 11, 2026. The 60-Day FRN citation is 91 FR 11964.

No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Wednesday, June 10, 2026. The 30-Day FRN citation is 91 FR 35185.

Part B: CONSULTATION

This is an extension of a previously approved collection. No additional consultation apart from soliciting public comments through the Federal Register was conducted for this submission.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

A Privacy Act Statement is required for this collection because it requires submission of the applicant's Employer Identification Number (EIN).

A System of Record Notice (SORN) is not required for this collection because records are not retrievable by PII.

A Privacy Impact Assessment (PIA) was completed and reviewed by the USACE Privacy Office during the development of the CWIFP web-based application system. PII is collected, however the majority of the collected PII falls under the business rolodex. The other PII has been determined to be at the Low impact level. Data collected as part of the Preliminary Application and Full Application will be stored and managed within an IL4 cloud solution and on USACE's secure network/SharePoint or USACE Teams, which will have restricted permissions.

The request for applications will follow directions provided in General Records Schedule 1.1 for Items 010 and 011. Official records held in the office of record will be destroyed 6 years after loan closing, but longer retention is authorized if required for business use. All other copies will be destroyed when business use ceases.

11. Sensitive Questions

EIN is collected to provide positive identification of the applicant and to verify that financial and tax documentation provided by the applicant as part of the Preliminary Application is complete, accurate, and consistent with official tax records.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instrument

ENG Form 6176 (Preliminary Application)

- a) Number of Respondents: 25
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 25
- d) Response Time: 50 hours
- e) Respondent Burden Hours: 1,250 hours

ENG Form 6177 (Final Application)

- a) Number of Respondents: 15
- b) Number of Responses Per Respondent: 1

- c) Number of Total Annual Responses: 15
  - d) Response Time: 100 hours
  - e) Respondent Burden Hours: 1,500 hours
- 2) Total Submission Burden
- a) Total Number of Respondents: 40
  - b) Total Number of Annual Responses: 40
  - c) Total Respondent Burden Hours: 2,750 hours

## Part B: LABOR COST OF RESPONDENT BURDEN

- 1) Collection Instrument
- ENG Form 6176 (Preliminary Application)
- a) Number of Total Annual Responses: 25
  - b) Response Time: 50 hours
  - c) Respondent Hourly Wage: \$50.41 (Weighted average of expected respondent occupations)
  - d) Labor Burden per Response: \$2,520.50
  - e) Total Labor Burden: \$63,013
- ENG Form 6177 (Final Application)
- a) Number of Total Annual Responses: 15
  - b) Response Time: 100 hours
  - c) Respondent Hourly Wage: \$49.40 (Weighted average of expected respondent occupations)
  - d) Labor Burden per Response: \$4,940
  - e) Total Labor Burden: \$74,100
- 2) Overall Labor Burden
- a) Total Number of Annual Responses: 40
  - b) Total Labor Burden: \$137,113

The Respondent hourly wage was determined by using May 2025 data from the Bureau of Labor Statistics website (<https://www.bls.gov/home.htm>). Expected respondent occupations include engineers [BLS occupation code 17-2000], lawyers [BLS occupation code 23-1011], management occupations [BLS occupation code 11-0000], and office and administrative support [BLS occupation code 43-0000].

### 13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

### 14. Cost to the Federal Government

## Part A: LABOR COST TO THE FEDERAL GOVERNMENT

- 1) Collection Instruments:
  - ENG Form 6176 (Preliminary Application)
    - a) Number of Total Annual Responses: 25
    - b) Processing Time per Response: 60 hours
    - c) Hourly Wage of Worker(s) Processing Responses: \$145
    - d) Cost to Process Each Response: \$8,700
    - e) Total Cost to Process Responses: \$217,500
  - ENG Form 6177 (Final Application)
    - a) Number of Total Annual Responses: 15
    - b) Processing Time per Response: 300 hours
    - c) Hourly Wage of Worker(s) Processing Responses: \$145
    - d) Cost to Process Each Response: \$43,500
    - e) Total Cost to Process Responses: \$652,500
- 2) Overall Labor Burden to the Federal Government
  - a) Total Number of Annual Responses: 40
  - b) Total Labor Burden: \$870,000

The hourly wage for workers processing responses is based on the approximate average hourly rate of USACE employees who review and process the CWIFP application forms as of May 2025.

#### Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
  - a) Equipment: \$0
  - b) Printing: \$0
  - c) Postage: \$0
  - d) Software Purchases: \$0
  - e) Licensing Costs: \$0
  - f) Other: \$0
- 2) Total Operational and Maintenance Cost: \$0

#### Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$870,000
- 2) Total Operational and Maintenance Costs: \$0
- 3) Total Cost to the Federal Government: \$870,000

#### 15. Reasons for Change in Burden

The burden estimates have increased for the following reasons:

- Updated hourly wage data from 2024 Bureau of Labor Statistics,
- Increase in the number of respondents based on the larger than anticipated interest in the CWIFP program, and
- Increase in corresponding processing times and cost based on USACE's experience in reviewing the information collected in the applications received to date.

The proposed changes to Section VII of the Final Application (detailed in the Summary of Changes) do not affect the burden estimates.

16. Publication of Results

USACE publishes on an annual basis summary-level information for preliminary application submissions, final application submissions, and summaries of loans issued. The summary-level information includes project name and description, location, the population protected or served by the project, and the loan amount. In addition, USACE publishes information describing the cohort of loans issued each year including information such as number of projects selected, total loan amount, total infrastructure investment supported, and total population protected or served. In general, the detailed information provided by applicants in the Preliminary Application and Final Application will not be published. However, the instructions accompanying this collection inform prospective applicants that USACE may be required to disclose their information under the Freedom of Information Act, unless the applicant has submitted a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as trade secret, proprietary, or company confidential.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.