

US EPA ARCHIVE DOCUMENT

**SUPPORTING STATEMENT  
INFORMATION COLLECTION REQUEST**

**for**

**Public Involvement Activities Feedback Surveys**

**of**

**The United States Environmental Protection Agency**

**January 2004**

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**U.S. ENVIRONMENTAL PROTECTION AGENCY  
VOLUNTARY FEEDBACK SURVEYS  
TO SUPPORT IMPROVEMENT OF  
EPA's PUBLIC INVOLVEMENT ACTIVITIES**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection:** Obtaining Feedback on Public Involvement Activities and Processes

**1(b) Short Characterization/Abstract**

On June 6, 2003, EPA issued its new Public Involvement Policy. Evaluation is one of the key elements in the Agency's "Framework for Implementing EPA's Public Involvement Policy." Critical to overall evaluation is feedback from participants involved in the public involvement activities. A well designed evaluation plan will make it possible for EPA to better understand: (1) if the Agency is taking the necessary steps to gather and consider public input; (2) the quality of the Agency's public involvement processes; (3) how to consistently and systematically learn and improve, and (4) how the Agency can be more accountable to the public.

The Environmental Protection Agency is seeking from the Office of Management and Budget (OMB) a generic clearance for public involvement activities surveys for a period of three years. The clearance will be used to conduct surveys about public involvement activities and processes. The surveys will help to identify participants' perceptions of their treatment during the activity, as well as the quality of pre-activity information, the activity and follow-up. All surveys will solicit opinions from participants in EPA public involvement activities on a voluntary basis, and will not involve "fact-finding" for the purposes of regulatory development or enforcement.

By seeking a generic clearance for a set of questions and questionnaires for each type of activity, EPA will have the flexibility to gather the views of participants and better determine the extent to which our public involvement activities meet their needs or need to be improved. EPA will not deviate from the approved questions and will report annually on the actual use of the series of surveys. The generic clearance will enable regional and program offices' staff to regularly use approved questionnaires and apply the resulting data to improve the way the Agency conducts its public involvement processes.

EPA's sponsoring organizations that use any of the various questionnaires will report their use of the survey instruments to the public involvement staff in the Office of Policy, Economics and Innovation within the Office of the Administrator. That staff has developed a Lotus Notes spreadsheet program that enables the survey users to enter data from the returned questionnaires and quickly process the results, report the findings and take appropriate action to improve their next similar sessions.

EPA estimates that users of the public involvement questionnaires (public meetings, public hearings, community advisory groups, Federal Advisory Committee Act groups, listening sessions, small discussion group sessions, stakeholder negotiations ) will request voluntary

responses from approximately 54,571 respondents for an estimated burden of 8,615 hours over the three-year period: 14,819 respondents and 2,343 hours in FY 2004; 18,382 respondents and 2,923 hours in FY 2005, and 21,370 respondents and 3,349 hours during FY 2006, for an average of .158 burden hours or 9.5 minutes per respondent overall.

## 2. Need for and Use of the Collection

### 2a. Need/Authority for the Collection

EPA's Public Involvement Policy states that the Assistant, Regional and Associate Administrators "Provide leadership and direction for their managers and staff by," among other responsibilities, "Evaluating the effectiveness of public involvement processes and taking action to improve these processes." To fulfill their responsibilities, the Agency's leadership and staff need a framework and tools to evaluate and measure how well EPA is implementing the policy's seven basic steps for conducting effective public involvement in both regulatory and non-regulatory processes:

1. Plan and budget for public involvement activities
2. Identify the interested and affected public
3. Consider providing technical or financial assistance to the public to facilitate involvement
4. Provide information and outreach to the public
5. Conduct public consultation and involvement activities
6. Review and use input, and provide feedback to the public
7. **Evaluate public involvement activities**

This ICR will be the cornerstone of a coordinated effort to track and improve the quality, effectiveness and consistency of EPA's public involvement activities and processes. Though individual programs and projects occasionally have conducted evaluations of their public involvement activities directly or through contractors, EPA has not encouraged a sustained agency-wide effort to determine the extent and quality of public involvement processes and activities and to improve their effectiveness for both participants and EPA. One of the findings of a 2003 survey of staff from a cross section of programs and regions from 39 projects was that "absent a conscientious evaluation effort, project staff are unlikely to learn from their past mistakes."

The ICR will be part of a suite of tools being developed by public involvement staff and practitioners across the Agency that staff (and other partners) can use to evaluate and measure public involvement activities on a consistent basis. That suite of tools will include:

- Commonly used performance measures to help staff and managers better identify whether public involvement practices/activities are performed and tools used appropriately, and whether they achieve the intended effects
- Training in the use of the tools, measures and techniques
- Survey/feedback templates that EPA staff can use to obtain input from the participating public for evaluating processes, activities and events
- A database/spreadsheet program enabling staff to enter data from returned questionnaires, easily determine results and determine what actions to take to improve events, activities or processes
- A central collection of evaluation instruments that EPA programs and regions have used

- to review their public involvement efforts, and
- **An OMB-approved Information Collection Request (ICR) to support gathering public involvement feedback based on a series of questionnaires that EPA staff can use to obtain input from the participating public for assessing processes, activities and events**

The Government Performance and Results Act of 1993 requires that agencies gather and use feedback. President Bush's Management Agenda underscores the need for citizen-centered service delivery, increased satisfaction with government services and the ability to prove government is doing a better job through measuring outcomes. These questionnaires and the related tools will enable EPA to improve its public involvement processes, activities and events, enhance public involvement opportunities in ways the public will value and ultimately will improve EPA decision making by more consistently taking into account the values and views of the citizens we serve.

The key to building trust in a public involvement process is to pro-actively gauge participants' perceptions and aggressively act on what they say went well and what needed correction. The techniques for obtaining such feedback do not have to be complicated or difficult to administer; however, they do have to be timely and the changes made because of public input must be visible and effective.

Some of the feedback needs in public involvement parallel those in customer satisfaction. Therefore, staff developing this Public Involvement ICR used OMB's Resource Manual for Customer Surveys (dated October 1993), which provides guidance on obtaining quality survey results. They also used EPA's "Hearing the Voice of the Customer: Guidelines for Customer Feedback and Customer Satisfaction Measurement" (November 1998).

EPA developed and used the "Guidelines" document to ensure proper design of EPA customer feedback and customer satisfaction measurement activities, increase the use and application of customer feedback, and build internal capacity to carry out those activities. The Guidelines use a five-stage model for feedback: Plan, Construct, Conduct, Analyze and Act. A long series of detailed questions supplement the Guidelines to further assist those planning on obtaining feedback. Portions of the Guidelines (available on the Internet @ <http://www.epa.gov/customerservice/guide.htm>) will be included in public involvement feedback training.

The successful operation of the generic clearance for customer satisfaction surveys and the applications for 1997, 1999 and 2003 generic information collection requests served as the model for developing this application. Public involvement staff in the National Center for Environmental Innovation (NCEI) will develop, distribute and post on the <http://www.epa.gov/publicinvolvement> web site a fact sheet reflecting OMB's "Terms of Clearance" for the ICR, strongly stating restrictions on the use of this clearance. Burden will be defined on the surveys. The agency will display the OMB control number and clearance expiration date on every survey and will inform respondents of its legal significance (see 5 CFR 1320.5(b)). In addition, every questionnaire will have introductory information for staff clarifying its purpose and any use restrictions. The spreadsheet/database will also have instructions for staff use and the collection of results.

## 2(b) Practical Utility/Uses of the Data

Information gathered from these surveys will continuously help EPA to build, validate and improve public involvement measurement systems. Survey results may be used to identify:

- 1) Needs and expectations of public involvement participants
- 2) Strengths and weaknesses of EPA involvement activities
- 3) Ideas or suggestions for improvement of EPA involvement activities from people who participate in them
- 4) Barriers to achieving improved public involvement processes and activities
- 5) Changes in what and how we measure the success of public involvement activities and processes
- 6) Common performance measures

By using these surveys, EPA personnel will be able to better define desired outcomes of public involvement processes and activities and determine whether the goals are met. For example, if achieving broad, inclusive involvement is a goal, there will be standards and questions to measure whether those involved believed that most (if not all) potential interests participated or had the opportunity to do so.

While the information will not be used for regulatory development, the results of public involvement surveys could lead to changes in those activities and in certain Agency processes and policies, and to development of additional guidance related to public involvement. Ultimately, these changes could result in citizen-driven improvements in the public involvement activities the Agency provides and the methods EPA uses to gather and consider public input.

In researching current literature for measures of success used to evaluate decision making processes and public involvement activities, EPA found many goals against which to measure attributes of processes, collaboration, decision quality, social and environmental outcomes. EPA recognizes that only retrospectively, after making a decision, can the Agency ask participants to evaluate the quality of the decision, the fairness of the process overall, or the degree to which their ideas are reflected in that decision. Measuring outcomes in the environment is much longer term and not in any way part of the work to be done under this ICR.

The Agency is determined to focus on gathering data that will enable us to improve activities that are component parts of larger decision-making processes. If we can use the information gathered to improve components of public involvement processes, people who participate in those events will have more meaningful and productive opportunities to provide input to the Agency.

Most of EPA's public involvement activities have similar components: finding the appropriate people to involve, ensuring they receive adequate notice of the opportunity to participate, providing information for their review, conducting the activity and doing follow-up after the event. In most cases asking those who participated how well EPA did [ insert action ] on a scale from 1 to 6 (with 7, don't know, as the last alternate) will provide good information about what the Agency needs to improve before holding the next similar event.

The questionnaires are structured primarily to obtain quantitative data. Most questions

are close-ended and use the Lichert Scale. EPA will also solicit some qualitative data using a small number of open-ended questions. Most of the qualitative questions ask for suggestions on how to improve an activity or process.

Achieving a performance standard of 75% positive responses (5 and above on a 6-point Lichert Scale) will be the first goal EPA uses as a measure of our success at engaging the public in Agency decision-making processes and related involvement activities. This goal will provide the necessary framework for management to use survey results.

Process questions can address the clarity of the stated goals and roles of the public and EPA, and focus on the overall process transparency. Questions address attributes of the actions leading to the event (publicity, information provision, access, etc.), the logistics (site convenience and comfort, time of day, equipment, provision for people with disabilities, etc) conduct of the event (courtesy, respect, equality, etc.) and ask for suggestions on how to improve the particular event or process. More areas covered in some of the of questionnaires follow.

#### **Process**

- clear goals
- clear process
- clear roles for public and agency
- process transparency to participants

#### **Appropriate people**

- diversity of views
- balance (on advisory groups)

#### **Information**

- accessibility of information and technical information
- clarity (understandable)
- quality
- timely provision of
- responsiveness to requests for

#### **Conduct of event**

- courtesy
- respect
- equal treatment of all
- 

#### **Logistics**

- convenience
- timing
- length
- provision for people with disabilities

#### **Effectiveness**

- each event
- overall process

- of staff or other support (FACA group, meeting facilitation)
- of technical assistance provided (FACA, CAG)
- capacity building among participants
- new alternatives from participants
- of personal participation
- otherwise unavailable information/innovative ideas/holistic views provided from participants

### **Completed process or decision**

- fair
- based on good science/good technical information
- economically and/or socially viable
- environmentally beneficial outcomes
- learning extended beyond participants to the general public (community capacity building)
- resolved conflict
- built trust
- considered public values

## **3. Non-duplication, Consultations, and Other Collection Criteria**

### **3(a) Non-duplication**

EPA staff who conduct public involvement activities will use the approved questions to learn how participants in their specific activities view various aspects of those activities. Therefore, the information collected will not overlap with other programmatic or satisfaction surveys. Every effort will be made to channel all public involvement related surveys through this ICR and to prevent misuse of this ICR for other purposes.

### **3(b) Public Notice Required Prior to ICR Submission to OMB**

EPA will conform to the requirement for public notice by publishing a preliminary and final Federal Register Notice concerning our intent under this ICR and requesting comment. On February 13, 2004 EPA published a first Federal Register Notice [Vol. 69, No. 30, OA-2003-0009, FRL-7618-8]. No comments were received.

### **3(c) Consultations**

EPA's National Center for Environmental Innovation (NCEI) public involvement staff requested input to this ICR application from practitioners across the Agency. This ICR was prepared in consultation with the Public Involvement Evaluation and Accountability Task Group of the Public Involvement Improvement Council and representatives from all organizations that responded to the opportunity to outline their possible uses of the public involvement questionnaires through the year 2006. This feedback was used to develop the estimates of staff and respondent burden. EPA contacted professional practitioners through their networks and organizations to request their comments during the period of review for the draft ICR.

### **3(d) Effects of Less Frequent Collection**

This information collection could not be conducted less frequently. EPA will learn from participant reactions to and perceptions of public involvement activities that the Agency now provides in order to improve them. Programs will not survey all participants in every activity provided. There will be sufficient time between surveys to allow the actions taken in response to customer comments to show results. There are no technical or legal obstacles to reducing the burden.

**3(e) General Guidelines**

This ICR complies with OMB's general guidelines for the collection of information.

**3(f) Confidentiality**

Not applicable

**3(g) Sensitive Questions**

Feedback questionnaires in this ICR application will not be used to collect any sensitive data.

**4. The Respondents and the Information Requested**

**4(a) Respondents/SIC Codes**

\_\_\_\_\_The EPA, by the very nature of its mandate, serves very large and diverse groups that participate in our decision-making processes or could in some way be affected by EPA decisions. Participants in public involvement activities range from well known scientific experts to representatives of various interest groups, to individual business or property owners, local officials, interested young students and residents of environmental justice neighborhoods and tribal members. The term "the public" is used in the Public Involvement Policy in the broadest sense to include anyone, including both individuals and organizations, who may have an interest in an Agency decision. Appendix 2 of the Policy provides further definition:

"In addition to private individuals, "the public" includes, but is not limited to, representatives of consumer, environmental and other advocacy groups; environmental justice groups; indigenous peoples; minority and ethnic groups; business and industrial interests, including small businesses; elected and appointed public officials; the news media; trade, industrial, agricultural and labor organizations; public health, scientific and professional representatives and societies; civic and community associations; faith-based organizations; and research, university, education and governmental organizations and associations."

**4(b) Information Requested**

(l) Data items, including record keeping requirements

The Agency will maintain records of the surveys' use. Offices sponsoring the surveys will retain files of the surveys, responses and analysis. Since these surveys will seek to

measure public opinions on Agency public involvement activities, the surveys have not and will not involve respondents in extensive searching of existing sources, or reformatting information to submit to the Agency. The Agency does not anticipate any record keeping activities on the part of the public under this ICR.

## (II) Respondent Activities

EPA public involvement surveys will focus on the quality of the pre-event work, the conduct of the public participation opportunity provided and the speed and completeness of follow-up requested. All questionnaires will solicit qualitative feedback. Most questionnaires will be completed immediately following the public involvement opportunity before participants leave the event location. Several will be mailed or e-mailed to participants as follow-up to a single event or upon completion of a decision-making process. All will involve reading instructions and completing questionnaires; some will also require mailing questionnaires. The questionnaires will require ten minutes or less to complete.

### **5. The Information Collected** **Agency Activities, Collection Methodology, and Information Management**

#### **5(a) Agency Activities.**

Agency activities associated with the collection of information include:

National Center for Environmental Innovation staff:

- Internal EPA review and approval of questionnaires (completed in 2003)
- Pretesting questionnaires submitted in this ICR application both internally and with less than 9 non-federal persons (completed 2003)

Headquarters Office/Region staff:

- Selecting public involvement event type and the appropriate pre-approved questionnaire
- Assembling data sources (mailing lists, etc.) if necessary
- Providing copies of the questionnaire at events, or disseminating questionnaire to potential respondents after an event or process
- Gathering information from respondents
- Answering respondent questions, follow-up
- Reviewing data
- Recording submissions and analyzing results
- Preparing findings
- Storing and maintaining results
- Reporting overall results to NCEI to share internally (and possible post on the <http://www.epa.gov/publicinvolvement> Internet page)
- Taking actions to improve activities, events and processes

#### **5(b) Collection Methodology and Information Management**

The following process will be established:

- EPA's sponsoring organizations report to PI staff in the NCEI their planned use of the questionnaires; report changes in those plans.

- The database and spreadsheet program record the sponsoring office, point of contact, date, location, type of event and number of respondents.
- In all cases, the purpose of the surveys is to obtain feedback from participants in EPA public involvement activities and processes so EPA can consider and use their ideas to improve public involvement.
- Costs and burden to the Agency are estimated based on approximate time necessary for data entry and consideration of results for each questionnaire type
- Costs and burden to the respondents will be tracked using the database program to count uses of and respondents to each questionnaire.
- Complex statistical methods will not be used for the collections covered under this generic clearance. The spreadsheet/database will perform simple calculations for those who enter respondent data.
- Sponsoring organizations within EPA will maintain records of all the occasions they use the questionnaires. The database program and spreadsheet will streamline this record keeping burden. In general, survey results will be maintained for three years or until after follow-up activities have been completed.
- EPA organizations will notify the public involvement staff in EPA's NCEI of their use of questionnaires, enter response data in the database program and periodically report follow-up actions taken based on survey results.
- The public involvement staff will share results, lessons learned and success stories with other offices and provide feedback on overall survey results. This base of experiences/ lessons-learned will be useful to state and federal partners that carry out public involvement activities and are seeking models for tracking and measuring success.

**5 (c) Small Entity Flexibility.** Not applicable.

**5 (d) Collection Schedule.**

The collection schedule needs to be flexible. Public involvement event schedules often slip and can drastically change if a decision process becomes more complex or controversial than anticipated. Such changes are not predictable, so estimating with precision is difficult. Table 5-1 is a draft plan for the use of questionnaires for 2004/5 - 2006/7 (depending on approval date).

This application is based solely on good faith estimates that follow. The burden estimate is not precise since EPA has never before attempted to coordinate obtaining feedback from participants in involvement events across all programs and regions. The number of surveys and the actual burden could be quite small during the first year and build as offices and regions see the usefulness of the data collected.

Community Advisory Groups (CAGs) are not managed by EPA; however, the Superfund community involvement coordinators work to ensure that such groups are effective. Many of the groups would welcome help in improving their meetings and may make use of the meeting feedback form. There are approximately 70 active CAGs nationwide, with an average of 15 people.

Some of the CAGs meet as often as monthly; others meet only once a quarter. Were about 30% of the groups to use the forms every other meeting (6 or 2 times annually), there

could be up to 21 groups using the surveys (30% of 70 = 21). Of the 21 groups, eleven may use the survey 6 times; ten may use it two times equaling 86 uses ( $11 \times 6 + 10 \times 2 = 86$ ) of the meeting survey. Were 30% of the groups to use the process effectiveness survey once a year, there could be 21 uses annually. Based on those projected uses, respondent estimates would equal 1605 respondents ( $86 \times 15 (1290) + 21 \times 15 (315)$ ). We project slight increases in use as CAG managers make meeting and process improvements and more groups choose to use the questionnaires.

EPA issues approximately 150 rules each year. Publication of a Federal Register Notice requesting public comment is required; sometimes public hearings are required; sometimes they are requested (RCRA). For the majority of rules and regulations, public comment is the only involvement activity. If one hearing were held for 30 of the rules (20%), and the feedback surveys were distributed at 50% of the events held, there would be approximately 15 uses of the public hearings survey the first year. There would be many fewer uses of the follow-up survey, perhaps as few as 5. Annually we project a steady, small increase in use for both instruments.

EPA's Center for Conflict Resolution and Prevention (CCRP) has a contract vehicle for agency-wide use that enables organizations to request services for convening and facilitating public involvement activities. The activities can be meetings, hearings, small group workshops/discussions, listening sessions, FACA sessions, negotiations, etc. The mix of activities changes from year to year.

Based on rough estimates, and the expectation that contractors will be required (by the terms of the contract) to do formative evaluation, and to consider using the approved forms to obtain ongoing participant feedback to help gauge their success, we estimate contractors will distribute the various surveys to participants as many as 275 times. This estimate is based on the past history of the three five-year contracts. During each contract cycle there is a steady build up to approximately 100 active task orders in year three, and then a slow decline in the number of active task orders until the end of year five. The contract is about to be renewed.

About 40% of the 100 task orders support contractors who do mediation and other alternative dispute resolution techniques; the remaining 60% are for public involvement activities. Of the 60 task orders, approximately 50 focus on a single project; the remaining ten average five projects each ( $50 + 10 \times 5 = 100$  projects). Of the 100 projects, approximately 50 hold only one public involvement event; the remaining 50 have three to six events. If all contractors are asked to distribute the surveys following all events, up to 275 uses are projected ( $50 + 50 \times 4.5$  (events)).

EPA does not believe that it is realistic to expect that every contractor will distribute the surveys after every event to assess its effectiveness however, and will not require that they do so. We project about 70 - 90 uses per year of the various event surveys and we believe that contractors will administer fewer of the post event follow-up surveys under the 100 active task orders of the CCRP.

In addition to preparing surveys for participants, meeting and process effectiveness surveys were prepared for EPA staff and/or their contractors working directly on EPA's behalf (e.g., in a facilitation or significant oversight role) to obtain their perspectives on public

involvement events. We intend to have contractors complete these forms at the end of meetings occasionally, at the end of a costly or complex process, or when a Federal Advisory Committee Act (FACA) advisory group is dissolved or finishes a long term project, particularly if a contractor has been involved throughout a multi-year process. Estimates include a few such assessments. Without contractor support, offices and regions sponsor the same types of events under community-based, watershed, voluntary, environmental justice, tribal and other types of projects and programs. Without an Agency-wide requirement to use the forms for a specific percent of all public involvement activities, EPA organizations will not widely adopt and use the surveys. However, if those who do so show continuous improvement in event outcomes and participant satisfaction, staff's voluntary use of the surveys should increase. Estimates reflect that expectation. We estimate that EPA/contractor use of the surveys will equal approximately 90 to 110 uses per year.<sup>1</sup>

EPA has 26 FACA advisory groups, each with a designated federal official (DFO). Most FACAs are long term standing groups that provide advice on a wide variety of topics to programs and the Agency. Based on the number of meetings held annually in fiscal years 2000 through 2003 (reported in GSA database [www.fido.gov/faca](http://www.fido.gov/faca) database), the annual average is 150 meetings. Were 60 percent of the events followed by use of the meeting questionnaire, we estimate approximately 90 uses of the FACA meeting effectiveness survey in the second year, slightly fewer (86) in 2004; slightly more (100) in 2006.

Until a FACA ends or a specific task of FACA input ends, there is no use for the process effectiveness questionnaire. Over the past four years 308 FACA reports with recommendations were issued. Since the number has been steadily decreasing (from 118 to 48), rather than use an average, we project a continued decline to not more than 40 reports in 2004. Annually, we expect not more than 15 uses of the process effectiveness questionnaire.

Annually, 26 DFOs will receive a request to assess the usefulness of their FACA's advice. (This survey does not require OMB approval since it is a federal official responding.)

**Table 5 - 1 Planned Use of Questionnaires**

Questionnaires	Number of Uses		
	2004	2005	2006
<b>Community Advisory Group Questionnaires</b>			
Meeting effectiveness ( participant)	86	90	100
Meeting effectiveness ( EPA/contractor)*	20	20	20
Process effectiveness (participant)	21	23	25
Process effectiveness (EPA/contractor)	5	6	7
<b>Public Meetings</b>			

<sup>1</sup>To simplify the burden and cost estimates, and because we are unclear as to this point as to the ratio of the number of EPA versus representative contractors who will be using the questionnaires, we prepared all EPA/contractor questionnaires as if they were for non-federal respondents. The only assessment for which we did not develop a burden assessment is the questionnaire prepared for designated federal officials under FACA, who will be used only by EPA (non-federal) staff.

Meeting Effectiveness (participant)	100	130	150
Meeting Effectiveness (EPA/contractor)	25	35	45
Post Meeting Follow-up (participant)	20	25	30
<b>Public Hearings</b>			
Hearing Effectiveness ( participant)	15	20	25
Hearing Effectiveness (EPA/contractor)	4	8	10
Post-Hearing Follow-up (participant)	5	10	12
<b>Listening Sessions</b>			
Listening Session Effectiveness (participant)	20	30	35
Listening Session Effectiveness (EPA/contractor)	5	7	9
Post-Session Follow-up (participant)	10	15	20
<b>Small Group Discussion/Workshop Sessions</b>			
Discussion Session Effectiveness (participant)	20	25	30
Discussion Session Effectiveness (EPA/contractor)	10	10	10
Post-Session Follow-Up (participant)	5	5	5
<b>Stakeholder Negotiations</b>			
Stakeholder Participants (participant)	2	3	4
Public Contributors	2	3	4
<b>Federal Advisory Committee Act Groups</b>			
Meeting effectiveness (participant)	86	90	100
Meeting effectiveness (EPA/contractor)	30	30	30
Process effectiveness ( participant)	15	15	15
Process effectiveness ( EPA/contractor )	2	2	2
DFO annual assessment**	26	26	26

\* EPA/contractor questionnaires were prepared as if they were for non-federal respondents. Only those contractors acting directly on behalf of EPA are qualified to fill out the EPA/contractor assessment questionnaires.

\*\* EPA may also use the DFO FACA assessment that OMB approved in GSA's 2002 application for all federal agencies with FACA groups.

## 6. Estimating the Burden and the Cost of the Collection

### 6(a) Estimating Respondent Burden.

Staff who developed the questionnaires did so knowing that respondent burden should be as low as possible in keeping with the Paperwork Reduction Act. The questionnaire designs are simple, convenient, easy to respond to and clear in content and purpose. At the end of a public event people are ready to start home and will not remain and respond if the questionnaires are long or complex. Therefore, questionnaires have limited scope and require a short time to complete.

Responding to the meeting and process effectiveness questionnaires (FACA, CAG, Meetings, Hearings, Listening Sessions, Small Group Discussions) averages about ten minutes. The questionnaires that focus on follow-up activities after those events take not more than 5 minutes to complete. The first stakeholder negotiation questionnaire takes 15 minutes to complete while the second requires 10 minutes. The estimate of respondent burden are shown below in Table 6-1 (a-c). The estimate of respondent burden was based on obtaining responses for questionnaire use as summarized in Table 5-1.

**Table 6-1 (a) Respondent Burden 2004**

	Minutes/ response (a)	Uses (b)	Responses/ use (c)	Total responses (d=b*c)	Burden hours (e=d*a/60)
<b>Community Advisory Group Questionnaires</b>					
Meeting effectiveness ( participant)	10	107	15	1,605	267.5
Meeting effectiveness ( EPA/contractor)	10	20	3	60	10
Process effectiveness (participant)	10	21	15	315	52.5
Process effectiveness (EPA/contractor)	10	5	1	5	0.8
<b>Public Meetings</b>					
Meeting Effectiveness (participant)	10	100	50	5,000	833.3
Meeting Effectiveness (EPA/contractor)	10	25	5	125	20.8
Post Meeting Follow-up (participant)	5	20	50	1,000	83.3
<b>Public Hearings</b>					
Hearing Effectiveness ( participant)	10	15	100	1,500	250
Hearing Effectiveness (EPA/contractor)	10	4	5	20	3.3
Post-Hearing Follow-up (participant)	5	5	20	100	8.3
<b>Listening Sessions</b>					
Session Effectiveness (participant)	10	20	100	2,000	333.3
Session Effectiveness (EPA/contractor)	10	5	5	25	4.2
Post-Session Follow-up (participant)	5	10	40	400	33.3
<b>Small Group Discussion/Workshop Sessions</b>					
Discussion Session Effectiveness (participant)	10	20	15	300	50
Session Effectiveness (EPA/contractor)	10	10	4	40	6.7
Post-Session Follow-Up (participant)	5	5	10	50	4.2
<b>Stakeholder Negotiations</b>					
Stakeholder Participants (participant)	15	2	12	24	6.0
Public Contributors	10	2	10	20	3.3
<b>Federal Advisory Committee Act Groups</b>					
Meeting effectiveness (participant)	10	86	15	1,290	215
Meeting effectiveness (EPA/contractor)	10	30	20	600	100

Process effectiveness ( participant )	10	15	20	300	50
Process effectiveness ( EPA/contractor )	10	2	20	40	6.7
DFO annual assessment	NO BURDEN	-	-	-	-
<b>2004 Totals</b>		529		14,819	2,343

**Table 6-1 (b) Respondent Burden 2005**

	Minutes/ response (a)	Uses (b)	Responses/ use (c)	Total responses (d=b*c)	Burden hours (e=d*a/60)
<b>Community Advisory Group Questionnaires</b>					
Meeting effectiveness ( participant )	10	90	15	1,350	225
Meeting effectiveness ( EPA/contractor )	10	20	3	60	10
Process effectiveness (participant)	10	23	15	345	57.5
Process effectiveness (EPA/contractor)	10	6	1	6	1.0
<b>Public Meetings</b>					
Meeting Effectiveness (participant)	10	130	50	6,500	1,083
Meeting Effectiveness (EPA/contractor)	10	35	5	175	29.2
Post Meeting Follow-up (participant)	5	25	50	1,250	104.2
<b>Public Hearings</b>					
Hearing Effectiveness ( participant )	10	20	100	2,000	333.3
Hearing Effectiveness (EPA/contractor)	10	8	5	40	6.7
Post-Hearing Follow-up (participant)	5	10	20	200	16.7
<b>Listening Sessions</b>					
Session Effectiveness (participant)	10	30	100	3,000	500
Session Effectiveness (EPA/contractor)	10	7	5	35	5.8
Post-Session Follow-up (participant)	5	15	40	600	50
<b>Small Group Discussion/Workshop Sessions</b>					
Discussion Session Effectiveness (participant)	15	25	15	375	93.8
Session Effectiveness (EPA/contractor)	10	10	4	40	6.7
Post-Session Follow-Up (participant)	5	5	10	50	4.2
<b>Stakeholder Negotiations</b>					
Stakeholder Participants (participant)	15	3	12	36	9.0
Public Contributors	10	3	10	30	5.0
<b>Federal Advisory Committee Act Groups</b>					
Meeting effectiveness (participant)	10	90	15	1,350	225
Meeting effectiveness (EPA/contractor)	10	30	20	600	100
Process effectiveness ( participant )	10	15	20	300	50

Process effectiveness ( EPA/contractor )	10	2	20	40	6.7
DFO annual assessment	NO BURDEN	-	-	-	-
<b>2005 Totals</b>		602		18,382	2,923

**Table 6-1 (c) Respondent Burden 2006**

	Minutes/ response (a)	Uses (b)	Responses/ use (c)	Total responses (d=b*c)	Burden hours (e=d*a/60)
<b>Community Advisory Group Questionnaires</b>					
Meeting effectiveness ( participant )	10	100	15	1,500	250
Meeting effectiveness ( EPA/contractor )	10	20	3	60	10
Process effectiveness ( participant )	10	25	15	375	62.5
Process effectiveness ( EPA/contractor )	10	7	1	7	1.2
<b>Public Meetings</b>					
Meeting Effectiveness ( participant )	10	150	50	7,500	1,250
Meeting Effectiveness ( EPA/contractor )	10	45	5	225	37.5
Post Meeting Follow-up ( participant )	5	30	50	1,500	125
<b>Public Hearings</b>					
Hearing Effectiveness ( participant )	10	25	100	2,500	416.7
Hearing Effectiveness ( EPA/contractor )	10	10	5	50	8.3
Post-Hearing Follow-up ( participant )	5	12	20	240	20.0
<b>Listening Sessions</b>					
Session Effectiveness ( participant )	10	35	100	3,500	583.3
Session Effectiveness ( EPA/contractor )	10	9	5	45	7.5
Post-Session Follow-up ( participant )	5	20	40	800	66.7
<b>Small Group Discussion/Workshop Sessions</b>					
Discussion Session Effectiveness ( participant )	10	30	15	450	75
Session Effectiveness ( EPA/contractor )	10	10	4	40	6.7
Post-Session Follow-Up ( participant )	5	5	10	50	4.2
<b>Stakeholder Negotiations</b>					
Stakeholder Participants ( participant )	15	4	12	48	12
Public Contributors	10	4	10	40	6.7
<b>Federal Advisory Committee Act Groups</b>					
Meeting effectiveness ( participant )	10	100	15	1,500	250
Meeting effectiveness ( EPA/contractor )	10	30	20	600	100
Process effectiveness ( participant )	10	15	20	300	50
Process effectiveness ( EPA/contractor )	10	2	20	40	6.7

DFO annual assessment	NO BURDEN	-	-	-	-
<b>2006 Totals</b>		688		21,370	3,350

The EPA estimates respondent burden as follows: FY 2004: 2,343 hours respondent burden from 14,819 individuals; FY 2005: 2,923 hours respondent burden from 18,382 individuals; FY 2006: 3,350 hours respondent burden from 21,370 individuals. The three year total burden hours estimate is 8,616 and the total number of respondents projected is 54,571 for an average of .158 burden hours or 9.5 minutes per respondent.

### 6(b) Estimating Respondent Costs

I Labor Costs. Since the respondents represent such a diverse group, EPA based wage estimates on the Bureau of Labor Statistics (BLS) of the U.S. Department of Labor average total compensation for “all full-time workers in private industry” as reported for March 2004.<sup>2</sup> Average total compensation (which includes benefits) equals \$26.50. EPA added 50% to this rate to reflect overhead for a wage of \$39.75.

There is no need for “developing, acquiring, or utilizing technology and systems for the purpose of collecting, validating or verifying information,” “....disclosing and providing information,” “adjusting the existing ways to comply with any previously applicable instructions or requirements,” “training personnel to be able to respond to a collection of information,” “searching data sources,” nor a need for the respondents to keep records. Burden activities include only a few steps: reviewing instructions, responding and submitting (handing back or dropping into a collection box on site) or e-mailing/ mailing responses when the surveys are not performed in person.

Table 6-2 displays the total burden estimates for respondents for each type of survey and total estimated respondent costs. The average burden estimate of 0.158 hours (9.5 minutes) was derived by dividing the total hours for years one through three (8,616) by the total number of respondents projected (54,571). The average cost per response over the three-year period is estimated to be \$6.28.

**Table 6-2 Respondent Universe, Total Burden and Costs**

	Surveys (a)	Respondents (Thousands) (b)	Burden Hours/ Survey (c)	Cost/ Survey (d)	Total Hours (e=b* 1000*c)	Total Costs (f=b* 1000*d)
Community Advisory Group Questionnaires						

<sup>2</sup>See Bureau of Labor Statistics. U.S. Department of Labor. Employer Costs for Employee Compensation. Table 11. Private industry, by occupational group and full-time and part-time status. March 2004. Accessed July 7, 2004 <<http://stats.bls.gov/news.release/ecec.t11.htm>>.

Meeting effectiveness ( participant)	297	4.455	0.167	6.64	743.9	29,581
Meeting effectiveness ( EPA/contractor)*	60	0.18	0.167	6.64	30	1,195
Process effectiveness (participant)	69	1.035	0.167	6.64	172.8	6,872
Process effectiveness (EPA/contractor)	18	0.018	0.167	6.64	3	120
<i>CAG TOTAL</i>	444	5.688	-	-	948	37,768
<b>Public Meetings</b>						
Meeting Effectiveness (participant)	380	19	0.167	6.64	3,173	126,160
Meeting Effectiveness (EPA/contractor)	105	0.525	0.167	6.64	87.6	3,486
Post Meeting Follow-up (participant)	75	3.75	0.083	3.31	311.2	12,413
<i>PUBLIC MEETING TOTAL</i>	560	23.275	-	-	3,571	142,059
<b>Public Hearings</b>						
Hearing Effectiveness ( participant)	60	6	0.167	6.64	1,002	39,840
Hearing Effectiveness (EPA/contractor)	22	0.11	.167	6.64	18.3	730
Post-Hearing Follow-up (participant)	27	0.54	0.083	3.31	44.8	1,787
<i>PUBLIC HEARING TOTAL</i>	109	6.65	-	-	1,065	42,357
<b>Listening Sessions</b>						
Session Effectiveness (participant)	85	8.5	0.167	6.64	1,419.5	56,440
Session Effectiveness (EPA/contractor)	21	0.105	0.167	6.64	17.5	697
Post-Session Follow-up (participant)	45	1.8	0.083	3.31	149.4	5,958
<i>LISTENING SESSION TOTAL</i>	151	10.405	-	-	1,586	63,095
<b>Small Group Discussion/Workshop Sessions</b>						
Discussion Session Effectiveness (participant)	75	1.125	0.167	6.64	187.8	7,470
Session Effectiveness (EPA/contractor)	30	0.12	0.167	6.64	20	797
Post-Session Follow-Up (participant)	15	0.15	0.083	3.31	12.4	497
<i>SMALL GROUP DISCUSSION TOTAL</i>	120	1.395	-	-	220	8,764
<b>Stakeholder Negotiations</b>						
Stakeholder Participants (participant)	9	0.108	0.250	9.94	27.0	1,074
Public Contributors	9	0.09	0.167	6.64	15	598
<i>STAKEHOLDER NEGOTIATION TOTAL</i>	18	0.198	-	-	42	1,672
<b>Federal Advisory Committee Act Groups</b>						
Meeting effectiveness (participant)	276	4.14	0.167	6.64	691.3	27,490
Meeting effectiveness (EPA/contractor)	90	1.8	0.167	6.64	300.6	11,952
Process effectiveness ( participant)	45	0.9	0.167	6.64	150.3	5,976
Process effectiveness ( EPA/contractor )	6	0.12	0.167	6.64	20	797
DFO annual assessment**	-	-	-	-	-	-

<i>FACA TOTAL</i>	417	6.96	-	-	1,164	46,215
<i>QUESTIONNAIRE TOTALS</i>	1,819	54.571	-	-	8,596	341,930

Because some of the activities are regularly held meetings (CAGs and FACAs), some respondents will complete the same questionnaire several times within the ICR period. This is necessary and appropriate since only they will be able to experience and comment on the effectiveness of the changes made in response to their input.

- II Capital and Operations and Maintenance Costs Not applicable.
- III Capital/Start-up vs. Operating and Maintenance (O & M) Costs Not applicable.
- IV Annualizing Capital Costs Not applicable.

**6 (c) Estimating Agency Burden and Cost.**

Tables 6-3 through 6-7 provide the estimates for agency burden associated with each aggregated survey type for disseminating public involvement surveys and analyzing the results. Wage estimates were divided into three categories of labor: Management (GS-15), Technical (GS-13), and Clerical (GS-7). Wage estimates were based on OPM's General Schedule for January 2004.<sup>3</sup> The OPM base salary was increased by 160% to account for the benefits and overhead available to the federal employee. (See Table 5 -1 for yearly plan totals by survey instrument type.)

**Table 6-3. Agency Burden/Cost for Meeting Effectiveness Surveys\***

<b>Activities for each Survey Use</b>	<b>Manager @ \$109</b>	<b>Burden Technical @ \$78</b>	<b>Hours Clerical @ \$37</b>	<b>Total Hrs.</b>	<b>Total Cost (cost*hours)</b>
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<sup>3</sup>See Office of Personnel Management. Salary Table 2004 - GS. 2004 General Schedule. Effective January 2004. Accessed July 8, 2004 <[http://www.opm.gov/oca/04tables/html/g\\_s\\_h.asp](http://www.opm.gov/oca/04tables/html/g_s_h.asp)>.

Gathering information		78		.5	39.00
Inputting data into database			37	.5	18.50
Reviewing data; follow-ups		78		1.0	78.00
Analyzing results		78		1.0	78.00
Storing and maintaining results			37	.2	7.40
Preparing survey findings		78		.5	39.00
Acting on results	109	78		.75	74.00
<b>Total burden by position (manager, technical, clerical)</b>	.5	3.25	.7		
<b>Total agency burden and cost per survey use</b>				4.45	\$333.90

\*These include meeting effectiveness surveys for CAGs, Public Meetings, Public Hearing, Listening Session, Small Group Discussion and FACA advisory groups (six surveys in total).

**Table 6-4. Agency Burden/Cost for Process Effectiveness Surveys\***

Activities for each Survey Use	Manager @ \$109	Burden Technical @ \$78	Hours Clerical @ \$37	Total Hours	Total Cost (cost*hours)
Gathering information		78		.5	39.00
Inputting data into database			37	.5	18.50
Reviewing data		78		.5	39.00
Analyzing results	109	78		.75	66.25
Storing and maintaining results			37	.1	3.70
Preparing survey findings		78		.5	39.00
Acting on results	109	78		.75	66.25
<b>Total burden by position (manager, technical, clerical)</b>	.5	2.5	.6		
<b>Total agency burden and cost per survey use</b>				3.6	\$271.70

\*These include process effectiveness surveys for CAGs and FACA advisory groups (two surveys in total).

**Table 6-5. Agency Burden/Cost for Follow-up Surveys\***

Activities for each Survey Use	Manager @ \$109	Burden Technical @ \$78	Hours Clerical @ \$37	Total Hours	Total Cost (cost*hours)
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Gathering information		78		.5	39.00
Inputting data into database			37	.1	3.70
Reviewing data		78		.5	39.00
Analyzing results		78		.25	19.50
Storing and maintaining results			37	.1	3.70
Preparing survey findings		78		.25	19.50
Acting on results	109	78		.4	37.40
<b>Total burden by position (manager, technical, clerical)</b>	.2	1.7	.2		
<b>Total agency burden and cost per survey use</b>				2.1	\$161.80

\*These include follow-up surveys for Public Meetings, Public Hearings, Listening Sessions, and Small Discussion Group Session surveys (four surveys in total).

**Table 6-6. Agency Burden/Cost for EPA/Contractor Meeting and Process Effectiveness Surveys\***

<b>Activities for each Survey Use</b>	<b>Manager @ \$109</b>	<b>Burden Technical @ \$78</b>	<b>Hours Clerical @ \$37</b>	<b>Total Hours</b>	<b>Total Cost (cost*hours)</b>
Gathering information		78		.5	39.00
Inputting data into database			37	.1	3.70
Reviewing data		78		.5	39.00
Analyzing results		78		.25	19.50
Storing and maintaining results			37	.1	3.70
Preparing survey findings		78		.25	19.50
Acting on results	109	78		.4	37.40
<b>Total burden by position (manager, technical, clerical)</b>	.2	1.7	.2		
<b>Total agency burden and cost per survey use</b>				2.1	\$161.80

\*These include meeting and process effectiveness surveys for CAGs, FACA advisory groups, Public Meetings, Public Hearings, Listening Sessions, and Small Group Discussion Session Surveys (eight surveys in total; six for meeting effectiveness and two for process effectiveness).

**Table 6-7. Agency Burden/Cost for Stakeholder Negotiation Surveys\***

<b>Activities for each Survey Use</b>	<b>Manager @ \$109</b>	<b>Burden Technical @ \$78</b>	<b>Hours Clerical @ \$37</b>	<b>Total Hours</b>	<b>Total Cost (cost*hours)</b>
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Gathering information		78		.5	39.00
Inputting data into database			37	.2	7.40
Reviewing data		78		1.0	78.00
Analyzing results		78		1.0	78.00
Storing and maintaining results			37	.2	7.40
Preparing survey findings		78		1.0	78.00
Acting on results	109	78		1.0	93.50
<b>Total burden by position (manager, technical, clerical)</b>	.5	4.0	.4		
<b>Total agency burden and cost per survey use</b>				4.9	\$381.30

\*These include stakeholder negotiation surveys for Stakeholder Participants and Public Contributors (two surveys in total).

A cross Agency staff group developed all questionnaires, so there are no additional costs of development and management review shown for using the surveys in any of the cost tables. Instructional materials accompany the surveys so their administration will take little staff time. Data entry and analysis are also streamlined when staff use the database spreadsheet package provided. Overall costs to the Agency for use of the feedback surveys is low and can be kept to a minimum because of the use of standardized surveys and data entry/analysis.

Survey development costs are estimated at approximately \$21,780 in EPA staff and intern salaries during 2002 and 2003. Costs are based on an average of 30 hours per survey X 22 surveys X \$33.00 an hour. This total includes the time of members of the cross Agency Public Involvement Evaluation and Accountability Task Group, interns and practitioners across EPA.

Through a survey and personal interviews the Task Group and supporting staff asked EPA practitioners to state the most commonly used public involvement activities, whether they might do more evaluation were it easier to do and the kinds of participant feedback that would be useful to them. Responses helped to define the types of activities for which to develop surveys and the types of questions to ask.

In addition, the Task Group used related input from EPA's 2001 two week Internet-based "Dialogue on Public Involvement in EPA Decisions." Dialogue participants noted problems with the timeliness of pre-event information, logistical problems at meetings, the quality of information provided and the treatment received before, at and after events. They stated that small improvements to logistics, personal treatment and information dissemination aspects of public involvement activities made because of their input could make large differences in participants' satisfaction with events, their belief in the process and their trust in the decisions.

Various Task Group members drafted the individual questionnaires which the full group

reviewed several times. A sample fact sheet for staff on how to use the surveys was the basis for a series of Guides on how to administer and use the six different sets of feedback templates. Several of the questionnaires and guides as well as the data entry system were pre-tested in the field (with fewer than 9 non federal persons) and discussed in conference presentations. Suggested changes were incorporated.

A Task group member developed the initial three models for the database spreadsheet and instructions for its use. Using the models, an EPA intern completed the remaining Guides, and will complete the database spreadsheets and instructional texts. These should be in place by the Summer of 2004.

Based on past use of the Customer Satisfaction ICR over the years, the Agency is not likely to administer each questionnaire as many times as now anticipated. Programs may not be ready to test whether the changes they make to a process or activity issue as quickly as they now predict, and it may take longer that they expect to institute changes.

#### **6(d) Estimating the Respondent Universe and Total Burden and Costs Burden**

Table 6-1(a-c) provides information on each survey by instrument type, number of respondents expected, burden per response, number of uses (if more than one) and burden hours requested per survey. Table 6-2 summarizes the total burden and costs for respondents by type of survey. Activities have been grouped to reflect the various types of surveys and the total respondents expected for each instrument type. In all cases, the activities performed are only the time required to read, respond and transmit the survey instruments. EPA based wage estimates on the Bureau of Labor Statistics (BLS) of the U.S. Department of Labor average total compensation for "all full-time workers in private industry" as reported for March 2004.<sup>4</sup> Average total compensation (which includes benefits) equals \$26.50. EPA added 50% to this rate to reflect overhead for a wage of \$39.75.

#### **6(e) Bottom Line Burden Hours and Cost Tables**

I Respondent Tally See Table 6-1 (a-c).

II The Agency Tally See Table 6-8. EPA incurred approximately \$21,780 in development and EPA review/approval costs during 2002-2003 in developing and testing the questionnaires prior to the submittal of this ICR application. Questionnaires will be used repeatedly over the time this ICR is in place. Collation and analysis of data should become more efficient as staff learn how to use the database program to review responses. We expect a steady increase in staff efficiency utilizing the surveys and database to minimize increases in costs as use of the surveys grows. Total EPA tally for the three-year period is \$511, 691.

**Table 6-8 Aggregate Agency Burden and Cost**

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<sup>4</sup>See Bureau of Labor Statistics. U.S. Department of Labor. Employer Costs for Employee Compensation. Table 11. Private industry, by occupational group and full-time and part-time status. March 2004. Accessed July 7, 2004 <<http://stats.bls.gov/news.release/ecec.t11.htm>>.

	<b>2004</b>	<b>2005</b>	<b>2006</b>
<b>Surveys</b>	<b>Number Uses x Cost / Survey</b>	<b>Number Uses x Cost / Survey</b>	<b>Number Uses x Cost / Survey</b>
CAG, Public Meeting, Public Hearing, Listening Session, Small Group Discussion and FACA Meeting Effectiveness Surveys	348 X \$333.90 \$116,197	385 X \$333.90 \$128,551	440 X \$333.90 \$146,916
CAG and FACA Process Effectiveness Surveys	36 X \$271.70 \$9,781	38 X \$271.70 \$10,324	40 X \$271.70 \$10,868
Public Meeting, Public Hearing and Listening Session Follow-up Surveys	40 X \$161.80 \$6,472	55X \$161.80 \$8,899	67 X \$161.80 \$10,840
EPA/Contractor Meeting Effectiveness and Overall Process Effectiveness Surveys	101 X \$161.80 \$16,341	112 X \$161.80 \$18,121	133 X \$161.80 \$21,519
Negotiations Feedback Surveys	4 X \$381.30 \$1,525	6 X \$381.30 \$2,287	8 X \$381.30 \$3,050
<b>Total</b>	<b>\$150,316</b>	<b>\$168,182</b>	<b>\$193,193</b>

III Variations in the Annual Bottom Line EPA burden hour projections are: FY 2004: 2,343 hours respondent burden from 14,819 individuals; FY 2005: 2,923 hours respondent burden from 18,382 individuals; FY 2006: 3,350 hours respondent burden from 21,370 individuals. Development costs which occurred prior to the use of any questionnaires do not factor into Agency survey administration costs, since all surveys will be pre-approved.

IV Reasons for Change in Burden EPA expects to see a steady growth in the use of the surveys as programs and regions learn how to use them and the database supporting them, and to better apply the information they obtain to improve public involvement processes and events. During the three years of this ICR, there should be small increases in the costs for administering surveys, analyzing data and acting on the findings due to more usage and salary increases.

**Table 6-9 Aggregate Agency and Respondents Burden/Cost\***

	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>Aggregate</b>
Respondents	\$93,296	\$115,159	\$133,404	\$341,859
Agency	\$150,316	\$168,182	\$193,193	\$511,691

\*In addition to the cost the agency expects to incur over the three-year period to administer the questionnaires, EPA incurred a cost of \$21,780 to develop them (see page 21).

V **Burden Statement:** The annual public reporting and recordkeeping burden for this collection of information is estimated to average 0.158 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. OA-2003-0009, which is available for public viewing at the Office of Environmental Information (OEI) Docket in the EPA Docket Center (EPA/DC), EPA West, Room B102, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the OEI Docket is (202) 566-1752. An electronic version of the public docket is available through EPA Dockets (EDOCKET) at <http://www.epa.gov/edocket>. Use EDOCKET to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. Once in the system, select "search," then key in the docket ID number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID No. OA-2003-0009 in any correspondence.