ICR SUPPORTING STATEMENT

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title of Information Collection

State Small Business Stationary Source Technical and Environmental Compliance Assistance Programs (SBTCP) Annual Reporting Form (Renewal)
ICR # 1748.09, OMB # 2060-0337

1(b) Short Characterization (Abstract)

Type of collection:
This is an annual collection of State Small Business Environmental Assistance Programs (SBEAP) information to measure their activities and accomplishments from the preceding calendar year.

Who is collecting?
This information is collected annually by the EPA Small Business Ombudsman (SBO) Team.

What is being collected?
Information on: program contacts; program resources (budget and staffing); structure; activities; outreach efforts, the types and numbers of such activities; technical assistance, types and numbers for these activities; internet data, website addresses, number of pages and number of hits; and outcome measures of program results.

Why?
The information will be collected, evaluated, summarized, and reported to the Congress as required under Section 507 of the Clean Air Act (CAA) as amended in 1990. Information collected will show trends in program advancement, budget changes, numbers of small businesses assisted; and the outcome questions will provide a foundation for reporting on the effectiveness of particular program efforts. This information is valuable to Congress, other federal stakeholders, and the small business community to see what is being accomplished by the state programs and the progress toward improved environmental performance by the small business community.

Who will use the information?
This information is used by the EPA SBO to evaluate the progress of state implementation of Section 507; by Congress in consideration of incorporating similar small business assistance programs into other environmental legislative actions as they come up for amendments or re-authorization; by states, both externally and internally to manage and highlight their programs; by national small business trade associations, the original promoters of this concept, to see how the state programs are functioning and to support their role as an advocate before the Congress for similar programs in environmental legislation; and by other federal agencies, primarily the Small Business Administration, in evaluating the effectiveness of this type of assistance effort.

How will the information be collected and stored?
Information will be collected using an e-mailed survey form. The EPA SBO will send the form to the respondents, and they will return the completed form to that office. The information will be stored in a spreadsheet that will be made available to programs upon request. The Small Business Ombudsman Team will evaluate, review, summarize, and compile the information for preparation of the *Status of State Small Business Compliance Assistance Programs* report.

What will this cost?
The information collection involves 53 respondents [50 states, 2 territories (Puerto Rico and the Virgin Islands), and the District of Columbia. The total respondent cost is estimated to be $104,664 per year.

2. NEED AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

This collection of information is pursuant to Section 507, Small Business Stationary Source Technical and Environmental Compliance Assistance Program (SBTCP) (a), (d), and (e) of the Clean Air Act as amended in 1990, Public Law 101-549, November 15, 1990. This Act directs EPA to monitor the 507 programs and to provide a periodic report to Congress. This responsibility has been delegated to EPA's Small Business Ombudsman.

2(b) Practical Utility/Users of the Data

The EPA SBO will compile the results of this collection into a report, including an objective summary of conclusions and recommendations relative to funding or other environmental legislative consideration. This information will be made available online for Congressional staff and committees interested in environmental matters and small business assistance activities at the state and local levels. In addition, this information will be provided to small business trade associations for their use in promoting the utility and viability of assistance programs, to EPA Headquarters and Regional Offices, to other federal agencies such as the Small Business Administration, to all state small business ombudsmen and small business environmental assistance program directors, to state governors, and other interested parties.

Both state and federal officials use the information to evaluate how well the programs are functioning, and to plan how to render more effective and less costly assistance. The constantly evolving nature of these programs means that this information provides key details to policy makers at the federal, state, and local levels.

The Agency has shared this information with all the stakeholders listed above. The State 507 programs have found this process to be a valuable tool for learning about other program's strengths and innovations. It promotes a continual process of sharing ideas across programs. The EPA SBO is also a resource for stakeholders and provides relevant data and narratives to policy makers at the federal and state levels upon request. The SBO relies on the information collected to support recommendations made to other offices within the EPA on how to effectively assist small business efforts to improve their environmental compliance.

3. NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Non-duplication

Information is being requested from and about programs mandated under Section 507 of the CAA of 1990; therefore, this information is unique to this collection.

During extensive review by the 507 programs, they expressed a need for expansion of existing data collection efforts since this data is not available from other sources and in no way duplicates internal state reporting requirements. Furthermore, neither the EPA Regional Offices nor Headquarters requires or has ever undertaken efforts to collect data of this nature.

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

Public notice on the renewal of this ICR was published in the Federal Register on November 17, 2011 under 76 FR 71339. This notice indicates that the ICR is up for renewal and that public comments on the previous burden estimates and any proposed changes are being sought by the EPA SBO. The Federal Register notice on the 60-day public comment period for this ICR is in Attachment B.

3(c) Consultations

As previously stated, this information collection review has had the in-depth involvement of many responsible state offices. Further, every year at the National Small Business Ombudsman and Small Business Environmental Assistance Providers Technical Conference, both in prior years and the upcoming year, possible improvements in the process and the reporting from this survey are discussed.

In preparing this ICR and in revising the Reporting Form, the EPA SBO worked with a subcommittee of the National Steering Committee (composed of members from Clean Air Act (CAA) Section 507 Program). The subcommittee consisted of representatives from the 507 programs. This committee began conference calls in November 2011 to form a work group that would meet as needed to complete the survey form. Committee members are:

Renee Lesjak Bashel, Wisconsin SBEAP	608-264-6153, renee.bashel@wisconsin.gov
Will Brunkhorst, NCAP	603-746-5175, wbrunk@comcast.net
David Carter, Kansas SBEAP	785-532-4998, dcarter@ksu.edu
Julie Churchill (Chair), Maine SBO/SBEAP	207-287-7881, julie.m.churchill@maine.gov
Kerri Cope, Kentucky SBEAP	502-564-0323, x148 kerri.cope@ky.gov
Phyllis Copeland, South Carolina SBO/SBEAP	803-898-0415, copelapt@dhec.sc.gov
Nancy Crickman, Pennsylvania SBEAP	215-746-6473, crickman@wharton.upenn.edu
Ryan Hamel, Pollution Prevention Institute	913-715-7018, ryan.hamel@jocogov.org
Christine Hoefler, Colorado SBEAP	303-692-3148, christine.hoefler@state.co.us
Sara Johnson, New Hampshire SBO/SBEAP	603-271-1379, sara.johnson@des.nh.gov
Troy Johnson, Minnesota SBEAP	651-296-7767, troy.johnson@state.mn.us
Judy Mirro, Vermont SBO/SBEAP	802-241-3745, judy.mirro@state.vt.us
Elizabeth Sapio, Colorado SBO	303-692-2135, elizabeth.sapio@state.co.us
Kenya Stump, Kentucky SBEAP	502-564-0323, x134, kenya.stump@ky.gov

EPA members of the group included:

- Angela Suber, EPA SBO Team; 202-566-2827, suber.angela@epa.gov
- Paula Zampieri, EPA SBO Team; 202-566-2496, zampieri.paula@epa.gov

- Audrey G. Zelanko, EPA Contractor, 724-452-4722, zelanko@smallbiz-enviroweb.org

Comments from all parties were very constructive. Key suggestions included:

- Create consistent definitions for all programs reporting.
- Ensure that all programs reported both the number of small businesses that were assisted, as well as total effort put forth by the program.
- Standardize the counting method for the number of businesses helped or assisted. Programs currently use various approaches for recording data.
- Expand the survey to include more outcome based data.

Following each conference call, the Reporting Form was revised based on Committee directives and the revised form was sent to committee members via e-mail.

Committee members were asked for their estimates of the reporting burden on the state programs for this survey. The total reporting burden was estimated to be 40 hours per state. This work is expected to be performed by experienced professional technical staff.

3(d) Effects of Less Frequent Collection

The submission of this information on less than an annual basis will not meet the useful intent under the Section 507 of the CAA. Annual reporting assures uniformity and consistency. All the states also use their annual submissions to the EPA SBO to report to higher management within the state.

3(e) General Guidelines

OMB's general guidelines for information collections have been followed in gathering information from the states. The EPA SBO requests information readily available during the conduct of the state's program and typically collected by the programs. The state records are those normally retained for good records management and reporting.

- Respondents are requested to report annually.
- Respondents typically have 60-90 days to prepare a written response to the collection of information request.
- Respondents are asked to complete and submit their Reporting Form and email it to the EPA SBO.
- Respondents are not required to retain their records for more than three years. The EPA SBO has not imposed any recordkeeping requirements, although the individual states may have their own recordkeeping policies.
- Respondents are not required to participate in a statistical survey that is not designed to produce data that can be generalized to the universe of the study.
- Respondents do not have to use any statistical data classification.
- Respondents do not receive a pledge of confidentiality in regard to the information collection. All information is considered public.
- Respondents are not asked to submit any proprietary, trade secret, or other confidential information.

3(f) Confidentiality/Sensitive Questions

Information in the Annual Report is aggregated and is not of a confidential nature. None of the information collected by this action results in or requests sensitive information of any nature from the states.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents/SIC Codes

Respondents will be *one* of the following state offices: environmental agency (SIC 9511), commerce or economic development department (SIC 9611), governor's office (SIC 9111), or ombudsman's office (SIC 9511). These departments/agencies typically are responsible for the conduct of the State 507 Programs.

4(b) Information Requested

A copy of the reporting form is attached.

(i) Data Items

States will report on the data items shown in the following table. Each item is designated as a record keeping or reporting item; activities that are customary and usual business practices (CBP) also are indicated, as required in the following section. The EPA SBO imposes no record keeping requirements on any respondent. Each state may have its own requirement for retention of records.

DATA ITEM	RECORD KEEPING	REPORTING	CBP
Program Information			
Name of State, Territory, or Local Agency		X	X
Reporting Form Contact		X	X
Combined SBO/SBAP/CAP Budget		X	X
Budgetary Funding Sources		X	X
Staffing		X	X
SBO/SBAP FTEs		X	X
Status of CAP		X	X
Outreach and Technical Assistance			
Air-only or Multimedia Assistance		X	X
Data on Offered Services/Activities	X		X
Data on Promotional Activities	X		X
Data on Website Activities			X
Significant Accomplishments, Awards, Highlights		X	X
Outcome Measures	X		X

Since the last clearance, changes to data items reflect the desire of State Programs to have more meaningful data to use to support their efforts and continued success.

(ii) Respondent Activities (see draft survey below)

The respondents will engage in the following activities to assemble, submit, and store the data items listed in the previous section. These activities reflect the items of burden mandated by the 1995 Paperwork Reduction Act.

Review Instructions -- Instructions are straight forward, include several examples, and the Form will remain the same for the next three years.

Acquire, Install, and Utilize Technology and Systems -- Information requested in this ICR is typical of information gathered as part of good business practices and anticipates future data needs. No special technology or systems are required for this collection. However programs will be encouraged to share methods they have developed to make the data collection easier.

Adjust the Existing Ways to Comply with Any Previously Applicable Instructions and Requirements -- The Reporting Form will remain the same from year to year. While it has changed from the previous version, the respondents will find many similarities between this version and the previous one.

Search Data Sources -- Gathering and updating information is an annual task and states have been reporting on the activities of their programs since 1995. Most data items requested are in the current Form and all data are collected as a customary business practice.

Complete and Review the Collection of Information -- Programs will provide data and one narrative to complete their submissions. Most of the information should be readily available. For their narrative submission, states are encouraged to select examples that best demonstrate the operations and accomplishments of their programs. Recording and reviewing the required information should be straightforward and procedural. Completion and review of the Reporting Form is anticipated to be a cooperative effort among the key program staff.

Transmit or Otherwise Disclose the Information -- The Reporting Form will be given to the respondents via email. Each respondent will then complete the information and return it to the SBO using the same method. This approach will enable the SBO to efficiently compile the information from the individual programs and prepare a periodic report.

Store, File, and Maintain -- The EPA SBO does not mandate any requirement on file storage and retention. Each state may set its own requirements on the length of time and the manner in which they store and retain their files.

5. THE INFORMATION COLLECTED -- AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

The electronic Reporting Form will be available to states and territories near the beginning of each calendar year. Respondents will have at least 60-90 days to respond to the request for information. The EPA's SBO will answer questions from the respondents regarding the Reporting Form.

The EPA SBO will collect, assemble, analyze, and store the information provided by the 507 programs. The SBD will use this information to prepare the Report to Congress. The EPA SBO will publish a periodic report, which will contain summary information, a perspective on the materials provided, selected highlights, conclusions, and recommendations. All state submittals will be included in the appendices. The EPA SBO will maintain copies of state submittals and the Annual Report electronically.

5(b) Collection Methodology and Management

Prior to the submission of this ICR, potential revisions to the Reporting Form received extensive review by representatives from the 507 programs. The Reporting Form was revised following the guidance provided by a convened work group of state representatives, via conference calls. Once the representatives had finalized the survey, the survey was forwarded out to all state programs for comment. The Workgroup integrated the comments received into the final draft.

For each reporting year, each 507 program will receive the electronic Reporting Form via email, along with instructions for gathering data and completing the report. Annual updating will be significantly streamlined in light of the automated nature of compiling the information.

Data quality will be checked upon receipt of each state's Reporting Form, during analysis, and in final review of the report. Information and data will be processed using spreadsheet software. Data will be entered manually.

Data is publicly accessible through the Periodic Report to Congress, which is available on the EPA SBO's home page.

5(c) Small Entity Flexibility

The completion of the Reporting Form does not require any input or action by any small entity.

5(d) Collection Schedule

This is an annual (calendar year) collection of information on the states' activities, accomplishments, and data outputs under Section 507 of the CAA. A typical reporting schedule would look as follows:

- Electronic Reporting Form is made available to states: January
- States complete Reporting Form: January-March
- State agency submits reporting form to EPA SBO: March 31
- EPA SBO Transfers Data to Spread sheet and conducts Analysis: May
- Data is made available to state programs: July
- EPA SBO prepares the periodic report to congress and obtains final EPA approvals: Typically on a bi-annual basis
- EPA SBO submits report: August of Reporting Year and posts the document online.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

Burden hour estimates are based on the results of a pretest of the original survey information and report preparation cycle, and experience with similar past surveys. The revised Reporting Form was discussed in detail with state ombudsmen or small business assistance program managers from ten of the 53 Section 507 reporting state programs (i.e., comprising the 50 states, the District of Columbia, the Virgin Islands, and Puerto Rico). They formulated a general consensus of how long it would take to complete the reporting form and who would likely be responsible from each state to complete the task.

The information requested was confirmed to be normal program activity information the 507 programs collect on an ongoing basis. Where a few state environmental agencies have delegated or contracted management of their technical assistance program, this information is part of the project management responsibilities. This requested reporting information typically would be compiled by experienced professional or technical staff.

On average, the requested information can be compiled readily and maintained by the state within 40 hours (assuming the state organization continuously maintains their records in a reasonably efficient manner) using experienced professional or technical staff. The 40-hour forecast includes 36 hours for record keeping and 4 hours for reporting the required information.

6(b) Estimating the Respondent Burden

Labor rates were derived from the Bureau of Labor Statistics, Employment Cost Trends, Table 4: State and Local Government by Occupational and Industry Group (http://data.bls.gov/cgi-bin/print.pl/news.release/ecec.t04.htm). Please refer to Worksheet 1.

6(c) Estimating Agency Burden and Cost

Agency rates are based on the US Office of Personnel Management 2012 General Schedule Locality Pay Tables. EPA estimates an average hourly regional labor cost of $67.21 for GS-15, $57.13 for GS-14; and $40.66 for GS-12 (all hourly rates are for step 5). Refer to Worksheet 2A.

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

(i) Respondent Burden - Refer to Worksheet 1.

(ii) Agency Burden - Refer to Worksheets 2A and 2B.

6(e) Bottom Line Burden Hours and Cost Tables

Please see Worksheets 1, 2A, 2B and 3.

Fifty-three states and territories will complete the Reporting form annually during the period covered by this ICR. No significant variation (more than 25 percent) in the annual reporting/record keeping burden over the life of this ICR is expected for the agency or the respondents. The cost over the entire period covered by the ICR is in Table 3.

6(f) Reasons for Change in Burden

There is no change in burden.

6(g) Burden Statement

Public reporting burden for this collection is estimated to average 4 hours plus 36 hours of record keeping per state responder. This includes the time for reviewing instructions, gathering information, searching data sources, completing and reviewing the collection of information, transmitting the information, and maintaining the information.

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 purpose of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjusting the existing ways to comply with any previous applicable instructions and requirements; train personnel to respond to 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 number 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 Number EPA-HQ-OA-2007-0706 , which is available for online viewing at www.regulations.gov, or in person viewing at the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. 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 at www.regulations.gov. This site can be used 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. When 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, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OA-2007-0706 and OMB Control Number 2060-0337 in any correspondence.

WORKSHEET 1: ANNUAL RESPONDENT BURDEN/COST ESTIMATE

Collection Activity	Burden Hours	Total Labor Costs Per Year*	Capital Costs	O & M Costs	Respondent Universe	Total Hours Per Year-all respondents	Total Cost Per Year-all respondents
Annual Recordkeeping burden	36	$1,777.32	0	0	53	1,908	$94,197.96
Annual Reporting Burden	4	$197.48	0	0	53	212	10,466.44
TOTALS	40	$1,974.8	0	0	53	2,120	$104,664.40

* Based on Prof/Tech rate of $49.37 per hour

WORKSHEET 2A: ANNUAL AGENCY BURDEN/COST ESTIMATE

GS Level	Agency Burden Hours	Federal pay rate (step 5)	Annual Cost	Capital Costs	O & M Costs	Total Costs
GS15	30	$67.21/hr	$2,016.3	0	0	$2,016.3
GS14	78	$57.13/hr	$4,456.14	0	0	$4,456.14
GS12	160	$40.66/hr	$6,505.60	0	0	$6,505.60
Total	268		$12,978.04	0	0	$12,978.04

Activities include Review/update survey instrument (not including the cost of renewing the ICR every three years, Maintaining a master informational data base, answering respondent questions, Review of submissions for accuracy and completeness, preparing a report from the data, Agency review and approval process, and distributing the report.

WORKSHEET 2B: ANNUAL CONTRACTOR BURDEN/COST ESTIMATE

Professional Level	Rate	Hours per year	Cost per year
PL4	$80.33	72	$5,783.76
PL2	$53.18	304	$16,166.72
Total		376	$21,950.48

WORKSHEET 3: COSTS OVER THE ENTIRE PERIOD COVERED BY THE ICR

	Total Annual Costs	Costs over 3 years
Agency	$12,978.04	$38,934.12
Contractors	$21,950.48	$65,851.44
All respondents	$104,664.40	$313,993.2
TOTAL		$418,778.76