

1Supporting Statement A

State Water Resources Research Institute Program Annual Application, National Competitive Grants, and Reporting

OMB Control Number 1028-0097

Terms of Clearance: None

Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The U.S. Geological Survey (USGS) Water Resources Research Act (WRRRA) program issues an annual announcement to solicit applications for the noncompetitive State Water Resources Research Program annual grants authorized by section 104(c) and for the national competitive grant program authorized by section 104(g) of the Water Resources Research Act of 1984 (P.L. 98-242), as amended [42 USC 10303(c)].

Annual grants (104c) may contain research and information transfer projects as well as an administration project describing the institutes overall administration and objectives. The research projects are generally selected in a competitive statewide solicitation, peer review, and selection process designed and conducted by each institute. National competitive grants (104g) will focus on water problems and issues of a regional or interstate nature beyond those of concern only to a single State and which relate to specific program priorities identified jointly by the Secretary (of the Interior) and the institutes.

The State Water Resources Research Institutes were established under Section 104(a) of the Act [42 USC 10303(a)]. There are 54 Water Resources Research Institutes, one in each state, the District of Columbia, Puerto Rico, the U.S. Virgin Islands, and Guam. The Institutes are organized as the National Institutes for Water Resources (NIWR). NIWR cooperates with the USGS in establishing total programmatic direction, reporting on the activities of the institutes, coordinating and facilitating regional research and information and technology transfer.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.

The USGS WRRRA Program will use the information from this collection to ensure that sufficient and relevant information is available to evaluate the annual applications and will use the information from this collection to ensure that sufficient and relevant information is available to evaluate and select the proposals to be funded under the national competitive grant program.

The USGS WRRRA Program will use Standard Forms 424 (Application for Federal Assistance); 424A, (Budget Information, Non-Construction Programs); and 424B (Assurances, Non-Construction Programs).

We also collect the following information as part of each application:

- (1) Project narratives (including abstracts), which includes a statement of the problem to be addressed, scope and objectives of the proposed project, anticipated results and benefits of the proposed project, a description of the methods and procedures to be used, description of completed and ongoing related projects, training potential of the project, a plan for dissemination of the project results, and a description of the qualifications of the principal investigators on the project.
- (2) A proposed budget breakdown and budget justification for each project providing detailed information concerning how the funds will be utilized.
- (3) Letters of commitment of matching funds. An institutional cost sharing agreement (letter or letters) committing the applicant to all or part of the required matching shares.

For monitoring purposes, submission of an annual completion report for the annual applications and national competitive grants is also required.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.

Annual and national competitive grant applicants are required to submit their entire application, including project narratives, budget breakdowns, budget justifications, and letters of commitment of matching funds through the website at <https://www.grants.gov>. National competitive grant applications must also submit their SF 424, 424a and 424b via the website at <http://www.grants.gov> after approval by the Institute. Progress and completion reports for the projects are also submitted and managed by the WRRRA program Office. The proposal submission and reporting process is entirely paperless.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

Due to the unique nature of this program and authorizing legislation no other Federal agency collects this information. No duplication will occur.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Eligible applicants to this program are restricted to the 54 land grant universities housing the state water resources research institutes. The collection of information does not affect small businesses or other small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The purpose of the collection is to solicit, review adequately, and award grants annually on the basis of technical merit, as required by the Water Resources Research Act. The university-based research and information transfer program authorized by the Water Resources Research Act of 1984 would likely not be of as high merit and quality if the information were not collected or collected less frequently. Ultimately, the state of water science, training of professionals, and water management would be degraded.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- * **requiring respondents to report information to the agency more often than quarterly;**
- * **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- * **requiring respondents to submit more than an original and two copies of any document;**
- * **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- * **in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- * **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- * **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**

- * **requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no circumstances that require us to collect the information in a manner inconsistent with OMB guidelines.

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

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On August 5, 2019, we published in the Federal Register (84 FR 38039) a notice of our intent to request that OMB renew this information collection. In that notice we solicited comments for 60 days, ending October 4, 2019.

In addition to our Federal Register Notice, we solicited comments from several current Institute Directors who prepare the applications and write the annual report. Three responded and all stated that an estimate of 100 hours to prepare the annual application (104c), 40 hours to provide the national competitive grant application (104g), and 40 hours for annual reporting of grant awards is reasonable.

The contact information for the three Directors who responded are provided below.

Director Maine Water Resources Center 102 Norman Smith Hall University of Maine Orono, Maine 04469-5710	Director New York State Water Resources Institute 1123 Bradfield Hall Cornell University Ithaca, New York 14853-1901
Director Water Resources Center 1 Lippitt Road University of Rhode Island Kingston, Rhode Island 02881	

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payments or gifts are made other than the remuneration of grantees.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

No assurance of confidentiality is given to respondents. We will protect information from under the Freedom of Information Act (5 U.S.C. 552) and implementing regulations (43 CFR part 2), and under regulations at 30 CFR 250.197, “Data and information to be made available to the public or for limited inspection.” We intend to release the project abstracts and names of primary investigators for awarded/funded projects only.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No questions of a sensitive nature will be asked.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- * **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential**

respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

- * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- * Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.**

We estimate the total burden hours for this collection, including annual application, national competitive grant preparation and annual reporting, will be 10,160 hours. Our estimates are based on our own experience plus the outreach described in item 8. We expect to receive 54 annual applications, 65 national competitive grant applications, and 54 reports annually. These estimates include time for project conception and development, proposal writing and reviewing, registering online, submitting the proposal application through Grants.gov, and submitting the project narrative, budget breakdown, budget justification, and letters of commitment of matching funds through the website at <https://www.grants.gov>. In addition to the application it takes another 40 hours to fulfill the annual reporting requirements (totaling 2,160 burden hours).

We estimate an aggregated annual cost to the Institutes to be \$513,588 (see Table 1). We estimate it costs the Institutes approximately \$272,970 dollars to prepare the annual application, approximately \$131,430 dollars to prepare the national competitive grants applications and another \$109,188 dollars to complete the annual report. The hour cost is based on BLS news release USDL 19-0449 of March 19, 2019, for average full compensation per hour including benefits for state and local government workers. The particular value utilized was for \$50.55 for individuals.

Table 1. Estimated Dollar Value of Annual Burden Hours

<i>Activity</i>	<i>Annual Number of Responses</i>	<i>Estimated Completion Time per Response</i>	<i>Total Annual Burden Hours</i>	<i>Dollar Value of Burden Hour Including Benefits</i>	<i>Total Dollar Value of Annual Burden Hours</i>
Annual Application (104c)	54	100 hours	5,400	\$50.55	\$272,970
National Competitive Grants (104g)	65	40 hours	2,600	\$50.55	\$131,430
Annual Reporting Requirements (both)	54	40 hours	2,160	\$50.55	\$109,188
TOTAL	173		10,160		\$513,588

13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- * **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- * **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- * **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

There is no non-hour cost burden to applicants under this collection. There is no fee for application, nor any fees associated with application requirements.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The total estimated cost to the Federal Government for processing and reviewing applications and reviewing reports as a result of this collection of information is \$64,124. This includes Federal employee salaries and benefits. Table 2 below shows Federal staff and grade levels performing various tasks associated with this information collection. We used the Office of Personnel Management Salary Table 2019-Washington, Baltimore Northern Virginia pay rate

(<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/>

DCB_h.pdf) to determine the hourly rate. We multiplied the hourly rate by 1.6 to account for benefits.

Table 2. Annual Cost to the Federal Government

Position	Grade/ Step	Hourly Rate	Hourly Rate incl. benefits (1.6 x hourly pay rate)	Estimated time spent by Federal Employees (hours)	Cost per federal staff (Hourly Pay Rate incl. Benefits x Number of Hours)
Program Coordinator	GS-15/7	\$79.26	\$126.82	300	\$38,046
Grants Program Officer	GS-13/5	\$53.85	\$86.16	64	\$5,514
Financial Specialist	GS-12/5	\$45.29	\$72.46	260	\$18,840
Peer Review Panelist #1	GS-13/5	53.85	\$86.16	10	\$862
Peer Review Panelist #2	GS-13/5	53.85	\$86.16	10	\$862
TOTAL					\$64,124

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

There are no significant program changes; however, we separated the burden hours associated with application preparation and those pertaining to annual reporting.

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

The information collected will not be tabulated or published for statistical use; however, abstracts of all research projects and all final reports will be published annually on the USGS WRRRA website.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We will display the OMB control number and expiration date on the grant announcement.

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

There are no exceptions to the certification statement.