

Good morning,

My name is Emilia Echeveste of the Existing Chemicals Risk Management Division at the Environmental Protection Agency (EPA). I am writing to you today to request your assistance on an Information Collection Request (ICR). For the past few months, EPA has been updating the ICR for the Asbestos-Containing Materials in Schools and Asbestos Model Accreditation Plans. As part of our consultation process, we are requesting comments from organizations on this ICR renewal proposal.

Our records indicate that in the past you or your organization may have participated as a representative of your organization in responding to the EPA's questions on this ICR. The survey should only take about 15 minutes and your response is voluntary. Should you choose to respond, we ask that you do not submit any sensitive, confidential business information or business phone numbers as part of your response. Here is a link to the Federal Register announcement: <https://www.regulations.gov/document/EPA-HQ-OPPT-2017-0319-0031>. The ICR supporting statement is available in the same docket as the announcement.

The ICR questionnaire is attached for your convenience.

Please respond via return e-mail or submit your responses to the EPA Docket EPA-HQ-OPPT-2017-0319 no later than September 22, 2025. EPA will consider your feedback, as well as any public comments received in response to the Federal Register Notice identified above, in preparing a final document for OMB review.

We greatly appreciate your time and participation.

Stakeholder Response: **None**

Consultation Questions for ICR Renewals

(1) Publicly Available Data

- A. Is the data that the Agency seeks available from any public source, or already collected by another office at EPA or by another agency?

- B. If yes, where can you find the data?
(Does your answer indicate a true duplication, or does the input indicate that certain data elements are available, but that they do not meet our data needs very well?)

(2) Frequency of Collection

Can the Agency collect the information less frequently and still produce the same outcome?

(3) Clarity of Instructions

- A. The ICR is intended to require that respondents provide certain data so that the Agency can utilize them.

- B. Based on the instructions (regulations, PR Notices, etc.), is it clear what you are required to do, and how to submit such data? If not, what suggestions do you have to clarify the instructions?

- C. Do you understand that you are required to maintain records?

- D. Considering that there is no required submission format, is it difficult to submit information in ways that are clear, logical, and easy to complete?

- E. Are there forms associated with this process? Do you use them? Are they clear, logical, and easy to complete?

(4) Electronic Reporting and Record keeping

The Government Paperwork Elimination Act requires agencies make available to the public electronic reporting alternatives to paper-based submissions by 2003, unless there is a strong reason for not doing so. One such reason is that, at the present time, the Agency is unable to ensure the security of CBI that might be transmitted over the Internet.

- A. What do you think about electronic submissions, such as the Agency's Central Data Exchange (CDX)?

- B. Are you keeping your records electronically? If yes, in what format?

(5) Burden and Costs

§ Are the labor rates accurate? **(Please see question 12 of the supporting statement)**

- A. Bearing in mind that the burden and cost estimates include only burden hours and costs associated with the paperwork involved with this ICR, *e.g.*, the ICR does not include estimated burden hours and costs for conducting studies, are the estimated burden hours and labor rates accurate? If you provide burden and cost estimates that are substantially different from EPA's, please provide an explanation of how you arrived at your estimates.

- B. Are there other costs that should be accounted for that may have been missed?