

U.S. Environmental Protection Agency
General Grants Performance Reporting Information Collection Request (ICR)
Response to Stakeholder Questions: October 15, 2024

What is an Information Collection Request (ICR)? How does an ICR relate to grant performance reporting at EPA?

The [Paperwork Reduction Act \(PRA\)](#) governs how federal agencies collect information from the public, i.e., 10 or more individuals, groups, or entities outside of the federal government. The PRA governs how federal agencies such as EPA collect performance reports from entities that receive federal funds, i.e., grantees, via work plans, interim reports (often called progress reports), and final reports.

- Prior to collecting information, an Agency must obtain approval under PRA from the Office of Management and Budget (OMB) by developing an **Information Collection Request (ICR)**.
 - The standard ICR approval process includes two invitations for public comment via publication of Federal Register Notices. The first comment period lasts 60 days and the second lasts 30 days.
 - ICRs approved by OMB must be renewed every three years via the standard approval process or the authorization for collecting information may expire.
- Written reports from the public, such as grantee performance reports, require PRA clearance. Currently, EPA grant programs' performance reporting is covered by:
 - EPA's [General Administrative Requirements for Assistance Programs](#) ICR (known as the General Grants Administration ICR), gives EPA grant programs the authorization to ask grantees to file interim reports and final reports via "non-form" reporting, i.e., EPA is authorized to ask grantees for performance reporting, e.g. interim reports and final reports written in a narrative style responding to open-ended questions.
 - Grant programs' program-specific ICRs that OMB has approved, and that authorize performance reports for individual grant programs or groups of similar grant programs, tailored to address their current data and reporting needs. Examples of ICRs authorizing program-specific performance reporting include those for the [Brownfields Programs](#), [Clean Water Act State Revolving Fund Program](#), and [Transportation and Climate Division Grant Programs](#).

What type of PRA clearance is this ICR?

The General Grants Performance Reporting ICR proposal is following OMB's [standard clearance process](#) for a [normal PRA clearance](#). EPA is using the title "General Grants Performance Reporting" to indicate that this ICR proposal covers EPA grant programs that do not have stand-alone program-specific ICRs. And that the forms in this ICR proposal are for the purpose of collecting *post-award* performance reports from EPA's grantees.

Why does EPA need a new Performance Reporting ICR? What changes will this ICR proposal create?

- The General Grants Performance Reporting ICR proposal represents EPA's effort to clarify performance reporting, geared toward the Agency's new and small grant programs, and designed to reduce reporting burdens on grantees that are currently submitting narrative reports.
- The burden of completing narrative reports can be especially high for small community-based grantees and first-time grantees. Representatives from such organizations have shared that they are often confused about reporting expectations and that in their opinion, narrative reporting

U.S. Environmental Protection Agency
***General Grants Performance Reporting* Information Collection Request (ICR)**
Response to Stakeholder Questions: October 15, 2024

creates unnecessary burdens related to uncertainty and rework because the approach relies on open-ended questions that are too broad to clearly indicate what should be reported.

- Consistent performance reporting forms with discrete data fields and focused questions provide clarity for grantees and offer a more efficient and consistent way to collect information. This reduces burden for grantees and EPA staff.
- EPA is committed to keeping reporting and administrative burdens as low as possible for grantees, while also ensuring that the Agency can collect the performance information needed to monitor and manage its grant programs. Collection of this information is essential to ensuring responsible stewardship of public funds; rigorous evidence-based learning and improvement; and transparent accountability to the American public.

What types of information collection instruments/forms and requirements are in the ICR proposal? Which programs will use these forms? What is the impact on state recipients of EPA funding?

The General Grants Performance Reporting ICR proposal includes three categories of information collection forms: (1) new general performance reporting forms; (2) a limited set of program-specific performance reporting forms; and (3) new labor and workforce metrics forms. Brief overviews of the three categories are below:

- 1. General performance reporting forms (work plans, interim reports, and final reports)** may be used by an EPA grant program that does not have a program-specific performance reporting ICR approved by OMB already in place.
 - The general performance reporting forms are designed for EPA's new and/or small grant programs that do not have program-specific ICRs for performance reporting.
 - An EPA grant program that does not have a program-specific performance reporting ICR is not automatically required to use these general performance reporting forms and may continue to use the narrative reporting approach authorized under EPA's general grants administration ICR.
 - Decisions to use the general performance reporting forms must be made by the EPA office responsible for funding the grant program. For example, an individual grant project officer cannot choose to use these performance reporting forms independent of decisions made by the EPA headquarters or regional office that centrally funds the grant program.
 - The general performance reporting forms in this ICR proposal are set up as Excel spreadsheets, with specific data fields that can be used to report quantitative information or qualitative information.
 - The general performance reporting forms cover core components of performance reporting: activities, location data, outputs, outcomes – as relevant and appropriate and consistent with, [EPA Order 5700.7A1](#).
- 2. A limited set of program-specific performance reporting forms are included in this ICR proposal in an effort by EPA to consolidate the number of performance reporting ICRs maintained across multiple Agency programs.**

U.S. Environmental Protection Agency
General Grants Performance Reporting Information Collection Request (ICR)
Response to Stakeholder Questions: October 15, 2024

- The program-specific performance reporting forms in this ICR proposal do not reflect any substantive changes in the content or scope of the information that grantees in these programs currently are being asked to provide. These program-specific performance reporting forms also align with the broad categories of information included in the general grant performance reporting forms.
 - **15 individual grant programs** have program-specific performance reporting forms included in this ICR proposal: including 8 work plan forms, 19 interim report forms, and 3 final report forms.
 - Grant programs that have submitted program-specific performance reporting forms for inclusion in this ICR proposal are listed below. (The assistance listing numbers and titles for these grant programs are provided in the Appendix.)
 - **OW (11):** Tribal Drinking Water Grants, Training and Technical Assistance Program for Rural Small and Tribal Wastewater Systems, Training and Technical Assistance for Safe Drinking Water, Section 319, Lead Testing and Reduction in School and Child Care Drinking Water (SDWA 1464d), Reducing Lead in Drinking Water (SDWA 1459B), Long Island Sound, Gulf of Mexico, Gulf Hypoxia, Environmental Finance Centers, Emerging Contaminants-Small and Disadvantaged Communities
 - **OCSPP (2):** FIFRA Grants, Pollution Prevention
 - **OAR (1):** State and Tribal Indoor Radon Grants
 - **OITA (1):** Indian Environmental General Assistance Program (GAP)
 - The benefit of including these program-specific performance reporting forms in this ICR proposal is to introduce administrative efficiencies for grantees and EPA grant program staff by reducing the number of program-specific performance reporting ICRs requiring tracking and renewals.
 - **Impact on state recipients of EPA funding:** Some grant programs that have included program-specific performance reporting forms in this ICR proposal, do make awards to state recipients. The inclusion of program-specific forms in this ICR proposal does not change the scope or content of what these grant programs have been asking state grantees to report.
- 3. Three forms to measure labor and workforce metrics** in projects funded by a small set of EPA's Investing in America (IIA) programs.
- *Aggregate Davis Bacon and Related Acts (DBRA) Reporting Form*
 - Content: Supplements existing DBRA weekly payroll data reporting, with request for additional information about the workers on a project (e.g., apprenticeship, demographics).

Covered projects/programs: Projects covered by DBRA reporting requirements in the following priority IRA grant programs, National Clean Investment Fund, Clean Communities Investment Accelerator, Environmental and Climate Justice Community Change Grants.
 - *"Good Jobs" Metrics Form*
 - Content: Metrics aligned with eight principles developed by the [Department of Labor's Good Jobs Initiative](#).

U.S. Environmental Protection Agency
General Grants Performance Reporting Information Collection Request (ICR)
Response to Stakeholder Questions: October 15, 2024

- Covered projects/programs: Projects receiving more than \$10 million in EPA funding in the Environmental and Climate Justice Community Change Grants Program.
- **Impact on State Recipients of EPA funding:** None – this grant program does not have state recipients.
- *Workforce Training Outcomes Form*
 - Content: Outcomes of EPA-funded workforce training grant programs.
 - Covered projects/programs: Projects that include workforce training activities in three priority IRA grant programs: Environmental and Climate Justice Community Change Grants, Clean Ports, Clean Heavy-Duty Vehicles.
 - **Impact on State Recipients of EPA funding:** The Clean Ports and Clean Heavy-Duty Vehicles Programs will include state recipients. Selections for funding awards are currently underway.
- *Note: EPA's General Grants Performance Reporting ICR proposal currently posted for comment does indicate that the Greenhouse Gas Reduction Fund programs (GGRF) – Solar for All; National Clean Investment Fund; Clean Communities Investment Accelerator – is on the list of labor and workforce reporting. However, EPA is in the process of revising the list of Investing in America (IIA) programs covered by the labor and workforce metrics forms and plans to remove GGRF from the final program list.*

What are the reporting expectations for state recipients of EPA funding that have set up a Performance Partnership Grant (PPG)?

- EPA notes that when funds are in a PPG, they are covered by a different authority than they would be as stand-alone programmatic grants.
- The Agency expects every headquarters and regional office to follow the appropriate authority when developing performance reporting expectations for each state funding recipient.
- Specifically, PPG requirements would supersede the administrative requirements for stand-alone grants.

EPA's Office of Grants and Debarment (OGD) has indicated states should conduct grant reporting semi-annually or annually unless there are performance concerns. Will quarterly reporting continue to be a choice?

- All EPA grant programs are expected to follow OGD's policies outlining that states should reporting semi-annually or annually unless there are performance concerns.
- Each EPA grant program can determine the reporting frequency for state grant recipients, consistent with EPA grant policy.

When does EPA anticipate this ICR will be implemented?

- For the General Grants Performance Reporting ICR proposal, the [Federal Register Notice](#) announcing the 30-day comment period was published on September 19, 2024 and comments can be submitted until October 21, 2024.
- The Office of Management and Budget (OMB) will review the ICR proposal and make a determination of approval after the comment period closes. The earliest that this ICR proposal would be approved is December 2024.

U.S. Environmental Protection Agency
General Grants Performance Reporting Information Collection Request (ICR)
Response to Stakeholder Questions: October 15, 2024

- EPA will provide guidance, training, and resources to the Agency's grant program staff and project officers, based on the details of the ICR that has OMB's final approval.

If a state has a grant and goes through September 2025 and this ICR is approved in December 2024, will the relevant grant program use the new forms for the final reporting period?

- Grant programs are expected to maintain reporting expectations in line with signed grant terms and conditions.

Could any of the forms in this ICR be used for data reporting periods prior to approval of the ICR?

- OMB ICR approval would authorize EPA grant programs to use the *new* general performance reporting forms and/or labor and workforce forms for reporting that will occur subsequent to that approval.
- An approved ICR will not give EPA grant programs the authority to require grantees to resubmit interim or final reports that have been submitted to the Agency prior to approval of the ICR.

Will this ICR allow EPA to make future changes or increases in programmatic grant reporting requirements without requiring public notice or OMB approval?

- Once an ICR is approved, EPA grant programs do not have the authority to change the reporting requirements described on the form unless a change to the form is approved by OMB via the ICR amendment or renewal process.
- Both the ICR amendment and renewal processes require the publication of Federal Register Notices announcing opportunities for public comment.

After the General Grants Performance Reporting ICR is approved, can EPA grant programs make any changes to the forms?

- Once a performance reporting form has been vetted through the ICR process and approved by OMB, EPA grant programs will not have the authority to change this form (e.g., EPA cannot add new questions to the form) *unless* the change to the form is approved via the ICR amendment or renewal process.
- EPA will not have the authority to change or add new methods for the grantee to submit a form (e.g., via email or postal mail) to the agency *unless* a new method is approved via the ICR amendment or renewal process.
- Below is general information about how grant programs may support grantees use of the performance reporting forms included in this ICR, once approved.

1. General Performance Reporting Forms

- Grant programs can provide additional guidance to help their grantees complete the performance reporting forms (e.g., list of outputs that grantees are expected to report, in line with grant program goals and objectives).
- Grant programs may provide completed example performance reporting forms as a resource for their grantees, to help set clear expectations for what information is needed in each section and with how much detail.

U.S. Environmental Protection Agency
General Grants Performance Reporting Information Collection Request (ICR)
Response to Stakeholder Questions: October 15, 2024

- The ICR proposal includes flexibilities for consideration and approval by OMB. Specifically the proposal identifies sections of the performance reporting forms that grant programs may remove (i.e., that grantees will not need to fill out) as well as individual questions that are not relevant to the grantees scope of work.

2. Program-Specific Performance Reporting Forms

- A grant program that submitted a program-specific performance reporting form for approval under this ICR will be the only grant program that can use that program-specific form.
- Grant programs cannot add or amend program-specific reporting forms unless these changes are approved by OMB via the ICR amendment process or renewal process.

3. Labor and Workforce Metrics Forms

- Only the grant programs specified in the ICR can use these performance reporting forms.
- Grant programs must use the performance reporting forms that were reviewed and approved by OMB. They cannot add or amend any questions unless these are approved by OMB via the ICR amendment process or renewal process.

Will approval of this ICR cause changes to other existing, OMB approved forms?

- This ICR will not change program-specific performance reporting forms that have been separately approved by OMB under the PRA.

If programs that have their own forms identify a set of questions they like in the general forms, can they add these questions to their own forms?

- An EPA grant program that has an approved program-specific performance reporting ICR cannot add new questions to their performance reporting forms unless they formally update their forms via the ICR amendment or renewal process.
- Both of these processes require the publication of Federal Register Notices announcing opportunities for public comment and then formal approval by OMB.

Where can I get more information about this ICR? Where can I find all the forms included in this ICR? How do I submit a comment?

- The [Federal Register Notice](#) announcing the 30 day comment period includes a link to a [docket](#) with all the performance reporting forms included in this ICR.
- Comments can be [submitted](#) to the docket until October 21, 2024.
- Queries about the General Grants Performance Reporting ICR can be emailed to EvidenceandEvaluation@epa.gov.

U.S. Environmental Protection Agency
General Grants Performance Reporting Information Collection Request (ICR)
Response to Stakeholder Questions: October 15, 2024

APPENDIX: Assistance listing numbers and titles for EPA grant programs that have included program-specific forms in the ICR proposal

Grant Program	Assistance Listing Number	Assistance Listing Title
State and Tribal Indoor Radon Grants	66.032	State Indoor Radon Grants
FIFRA Grants	66.605 66.700	Performance Partnership Grants and Consolidated Pesticide Enforcement Cooperative Agreements
Pollution Prevention Program	66.708	Pollution Prevention Grant Program
Indian Environmental General Assistance Program (GAP)	66.926	Indian Environmental General Assistance Program (GAP)
Emerging Contaminants in Small and Disadvantaged Communities (EC-SDC) Grants	66.442	Water Infrastructure Improvements for the Nation Small and Underserved Communities Emerging Contaminants Grant Program
Environmental Finance Center	66.203	Environmental Finance Center Grants
Gulf Hypoxia Program	66.485 66.487	Support for the Gulf Hypoxia Action Plan – BIL Non-State Member Support for the Gulf Hypoxia Action Plan – BIL
Gulf of Mexico Program	66.475	Geographic Programs -- Gulf of Mexico Program
Long Island Sound Program	66.437	Geographic Programs -- Long Island Sound Program
Reducing Lead in Drinking Water Grants	66.443	Reducing Lead in Drinking Water (SDWA 1459B)
Rural, Small, and Tribal Technical Assistance and Training Grant Program	66.446	Technical Assistance for Treatment Works (Clean Water Act [CWA] Section 104(b)(8))
Training and Technical Assistance to Improve Water Quality and Enable Small Public Water Systems to Provide Safe Drinking Water	66.424 66.436	Surveys, Studies, Investigations, Demonstrations, and Training Grants - Section 1442 of the Safe Drinking Water Act Surveys, Studies, Investigations, Demonstrations, and Training Grants and Cooperative Agreements - Section 104(b)(3) of the Clean Water Act
School and Child Care Lead Testing and Reduction Grant Program	66.444	Voluntary School and Child Care Lead Testing and Reduction Grant Program (SDWA 1464(d))
Section 319 Nonpoint Source Program	66.46	Nonpoint Source Implementation Grants
Tribal Drinking Water Grant Program	66.468 66.442	Drinking Water State Revolving Fund Water Infrastructure Improvements for the Nation Small and Underserved Communities Emerging Contaminants Grant Program