

**Department of Transportation  
Office of the Senior Procurement Executive**

**SUPPORTING STATEMENT**

**2105-0520**

**INTRODUCTION**

This is to request the Office of Management and Budget's (OMB) renewed three-year approved clearance for the information collection entitled, "Uniform Administrative Requirements for Grants and Agreements to State and Local Governments"}(OMB Control No. 2105-0520, which is currently due to expire on November 30, 2007.

**Part A. Justification.**

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

On March 12, 1987, President Reagan signed a memorandum directing all affected Executive departments and agencies to simultaneously issue a common rule that adopted governmentwide terms and conditions for grant to State and local governments. The departments and agencies followed the guidelines of OMB Circular A-102, and adopted the wording of the Circular verbatim, with their statutory deviations. The common rule was issued on March 11, 1988, and has been updated periodically to reflect new legislation and Executive Orders. The Department codified the common rule at 49 CFR part 18 and includes the OMB-required reporting and record-keeping requirements. This information collection includes only those DOT grant programs that utilize OMB standard forms (SF), SF-424, Application for Federal Assistance; SF-269, Financial Status Report; SF-270, Request for Advance or Reimbursement; SF-271, Outlay Report & Request for Reimbursement for Construction Programs; and SF-272, Federal Cash Transactions Report, and collect no additional information.

DOT GOAL: The Department of Transportation annually funds approximately \$52 billion in grants and cooperative agreements. Guidance for departmental formula and discretionary grant programs is contained in their authorizing legislation, program regulations, or departmental regulations. This guidance generally includes general project management requirements and the limitations, if any, on spending authority. Departmental grants are generally made to State and local governments, with a lesser amount going to Indian tribes, universities, and nonprofit organizations. These grants are normally used to assist these entities in the planning, design, and construction of transportation improvements (e.g., highway, transit, and airport improvements). Collection of this data provides the Department a mechanism for achieving organizational excellence in its grants administration.

**2. Indicate how, by whom, and for what purpose is the information used.**

The pre-award information, (SF-424, Application for Federal Assistance), is used to qualify and select grant applications. The post-award information, (SF –269, Financial Status Report; SF-270, Request for Advance or Reimbursement; SF-271 Outlay Report & Request for Reimbursement for Construction Programs and SF-272, Federal Cash Transactions Report), are used to monitor grantee performance. The after-the-grant information, (SF-269, Financial Status Report), is used to close out the grant awards. The information is necessary to ensure minimum fiscal control and accountability for Federal funds and deter fraud, waste and abuse.

**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.**

The information collection forms are governmentwide forms under the control of OMB. OMB provides guidance to Federal agencies on the use of these forms, including the requirement to use a baseline annual information collection burden of 70 hours per grantee respondent. Several ongoing Federal efforts, under the direction of OMB, are working on streamlining the forms and facilitating their use and storage, resulting in electronic information. These forms are available online from OMB, by accessing the grants web page of the DOT Office of the Senior Procurement Executive, and [www.grants.gov](http://www.grants.gov).

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose(s) describe in Item 2 above.**

There is no other current source for this information.

**5. If the collection of information involves small business or other small entities, describe the methods used to minimize burden.**

The information requirements pertain to the few small businesses or other small entities that receive financial assistance from DOT. However, OMB controls the information collection requirements.

**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.**

Information collection requirements follow OMB guidelines as prescribed in OMB Circular A-102. No less frequent collection is feasible.

**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.**

The information collection is consistent with 5CFR 1320.6 Public Protection.

**8. 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.**

DOT solicited comments on specific information collection requirements with a 60 Day Notice in the Federal Register, Vol. 72 Number 152 page 44606.

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

Not applicable.

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

No sensitive information is collected.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitude, religious beliefs, and other matters that are commonly considered private.**

No confidentiality is provided.

**12. Provide estimates of the hour burden of the collection of information.**

Grantees: The number of grantees x estimated hours x average hr. rate.  
Annual Recordkeeping and Reporting burden is based on the following:

The hourly rate was estimated for a Federal GS-9, step 5 (\$21.05) adjusted by an overhead rate of 33%, this provides an average hourly rate of \$28.14. This was used for both grantee and Federal costs.

The number of respondents used is based on statistical historical data for grantee respondents. This statistical method used is an average of DOT's 4 largest grant programs.

The number of hours used is based on the OMB baseline provided on the standard forms.

**Total # of respondents is 1,795.**  
 $1795 \times 70 \times \$28.14 = \$3,535,791$

**Total annual responses are 7180.**

DOT: Number of grantees x estimated hours x average hr. rate.  
 $1795 \times 25 \times \$28.14 = \$365,282.50$

**Percentage of these responses collected electronically is 75%.**

**Total Annual hours requested is 125,650**  
 $1795 \text{ responses} \times 70 \text{ hours} = 125,650$

**13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection.**

There is no additional cost burden.

**14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include qualification of hours, operational expense, and any other expense that would not have been incurred without this collection of information.**

See No. 12.

**15. Explain reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.**

There is no change to burden hours. Financial costs are increased to account for wage increases.

**16. For collection 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.**

There are no plans to publish any of the information collected.

**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.**

DOT is not seeking approval to not display the collection expiration dates.

**18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.**

There are no exceptions to the certification statement.