<u>SUPPORTING STATEMENT</u>

Federal Highway Administration (FHWA) State Reports for American Recovery and Reinvestment Act (ARRA)

INTRODUCTION

This is to request OMB's clearance for the information collection entitled, "Federal Highway Administration (FHWA) State Reports for American Recovery and Reinvestment Act (ARRA)".

1. Circumstances that make collection of information necessary.

The American Recovery and Reinvestment Act of 2009 (ARRA), provides the State Departments of Transportation and Federal Lands Agencies with $27.5 billion for highway infrastructure investment. With these funds also comes an increased level of data reporting with the stated goal of improving transparency and accountability at all levels of government. According to President Obama "Every American will be able to hold Washington accountable for these decisions by going online to see how and where their tax dollars are being spent." The Federal Highway Administration (FHWA) in concert with the Office of the Secretary of Transportation (OST) and the other modes within the U.S. Department of Transportation (DOT) will be taking the appropriate steps to ensure that this accountability and transparency is in place for all infrastructure investments.

The reporting requirements of the ARRA are covered in Sections 1201 and 1512. Specifically Section 1512 or the "Jobs Accountability Act" requires "any entity that receives recovery funds directly from the Federal Government (including recovery funds received through grant, loan, or contract) other than an individual," including States, to provide regular "Recipient Reports."

> SEC. 1512. REPORTS ON USE OF FUNDS.
> (c) RECIPIENT REPORTS.—Not later than 10 days after the end of each calendar quarter, each recipient that received recovery funds from a Federal agency shall submit a report to that agency that contains—
> (3) a detailed list of all projects or activities for which recovery funds were expended or obligated, including—
> (D) an estimate of the number of jobs created and the number of jobs retained by the project or activity

2. How, by whom, and for what purpose is the information used.

For reports to Congress under Section 1201 and reports to Recovery.gov under Section 1512. These reports will be used at all levels of government including local, state, and federal. The reports will for government communication with the public on the use of tax dollars for the creation and retention of jobs in the transportation community. The purpose is to meet the transparency requirements of the ARRA.

3. Extent of automated information collection.

The collection involves providing guidance to State Departments of Transportation for preparing a comma delimited text file for input into a database. These files could be extracted from Microsoft Excel or programmed output from existing systems in the State Departments of Transportation. The files to be created are organized to minimize the reporting of redundant data, and to meet the maximum number of statutory requirements with the least amount of data.

4. Efforts to identify duplication.

Any duplication of data is to allow for the identification of State, contractor, and/or unique project identifier. The data being requested are only the data that can not be pulled from existing data programs.

5. Efforts to minimize the burden on small businesses.

Small businesses would only need to complete the monthly jobs form, which should be readily available from their existing payroll and billing system.

6. Impact of less frequent collection of information.

None.

7. Special circumstances.

- Requiring respondents to report information to the agency more often than quarterly;

  Given the short period of time between recipient reporting and agency reporting in Section 1512. The U.S. DOT has determined that monthly reporting of jobs is necessary to allow time for the proper analysis of created and retained jobs, and the estimation of indirect jobs.

- Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

  No

- Requiring respondents to submit more than an original and two copies of any document;

  No

- Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;

  No

- 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;

No

- Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

  No

- 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

  No

- Requiring respondents to submit proprietary trade secret, 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.

  No

8. Compliance with 5 CFR 1320.8.

The FHWA published a Federal Register notice on May 20, 2009, page number 38080. No comments were received.

9. Payments or gifts to respondents.

There are no payments or gifts to be provided to the respondents.

10. Assurance of confidentiality.

None of the information is considered confidential.

11. Justification for collection of sensitive information.

There are no questions of a sensitive nature.

12. Estimate of burden hours for information collected.

52 States and territories will need to complete the following files:

- Initial Recovery Act Project Plan File
- Initial Recovery Act Award File
- Recipient File
- Monthly Status Employment and Project Status
- Quarterly Status File
- Top Paid Officers File

Initial Recovery Act Project Plan File and Initial Recovery Act Award File are required with each 1511 certification; estimated time to complete is approximately 1 hour each time each. These file are used to submit information concerning how each State and FLMA plans to invest and award their allotment of ARRA funding. Total hours for all states will be approximately 420.
Frequency: Updates are due within 2 weeks of the State or FLMA issuing a new Section 1511 certification.

Estimated Average Burden per Response: 1 hour.

Estimated Total Annual Burden Hours: 210 hours.

70 respondents x 1 hour per response x 3 responses annually = 210 annual burden hours

210 annual burden hours per file totaling 420 hours

Recipient File is required as a new contractor or sub-recipient is awarded. The recipient will be identified through the DUNS number which should allow information to be collected through a web service. Impact to the State Departments of Transportation should be minimal. A total of approximately 385 hours.
Frequency: Once per vendor or sub-recipient

Estimated Average Burden per Response: 10 minutes.

Estimated Total Annual Burden Hours: 385 hours.

70 respondents x 10 minutes per response x 33 responses annually = 385 annual burden hours

Monthly Status Employment and Project Status File is required monthly, with an estimated total time per state per month: 1.5 hour. Therefore approximately 1260 hours annually for all States. This file is submitted by States, FLMA and the FHWA to provide summary employment and project status for all active ARRA projects. These data will be used for meeting the reporting requirements of Sections 1201 and 1512.
Frequency: Monthly until September 2012

Estimated Average Burden per Response: 1.5 hour.

Estimated Total Annual Burden Hours: 1,260 hours.

70 respondents x 1.5 hours per response x 12 responses annually = 1260 annual burden hours

Quarterly Status File is required quarterly, with an estimated total time per state per quarter: 1 hour. Therefore approximately 156 hours annually for all States.
This file is submitted by States, FLMA and the FHWA to provide summary employment and funding status for all active ARRA projects. These data will be used for meeting the reporting requirements of Sections 1201 and 1512.
Frequency: Quarterly until September 2012

Estimated Average Burden per Response: 1 hour.

Estimated Total Annual Burden Hours: 280 hours

70 respondents x 1 hour per response x 4 responses annually = 280 annual burden hours

Top Paid Officers File will be submitted by the States to provide information concerning vendors for all Recovery Act projects. This data will be used for meeting the reporting requirements of Sections 1201, 1512 and 1609. States and FLMA shall provide the required information as individual vendors.
Frequency: Once per vendor

Estimated Average Burden per Response: 10 minutes.

Estimated Total Annual Burden Hours: 385 hour.

70 respondents x 10 minutes per response x 33 responses annually = 385 annual burden hours

The approximate total burden hours = 2730

13. Estimate of total annual cost to respondents.

Not applicable since information requested is currently maintained as part of existing payroll and billing systems.

14.   Estimate of cost to the Federal government.

Staff costs: 2,000 hours/year x $40.00/hour = $80,000
Equipment: $10,000/year
Software purchase and development: $250,000 for first year, $30,000 for subsequent years

15.   Explanation of program changes or adjustments:

FHWA has updated the guidance in the ARRA Reporting Requirements (reporting instructions). The new guidance instructs the states to submit their data using the Recovery Act Data System (RADS) in UPACS instead of email it to arra.submittal@dot.gov.

16.   Publication of results of data collection:

All material will be published monthly per OMB guidance.

17. Approval for not displaying the expiration date for OMB approval:

No such request is being sought.

18.   Exceptions to certification statement:

There are no exceptions to the certification statement for this information collection.