

Transit Research, Development, Demonstration, and Deployment Projects

JUSTIFICATION STATEMENT

Summary of Submission

This submission is a request for a reinstatement with change of a previously approved information collection.

Changes to Previously Submitted Collection:

- The total number of burden hours associated with this submission is 11,140. A burden reduction of -100 hours from the last approved collection reflects a correction, appropriately accounting for burden associated with HHS's Standard Form 424 (grants.gov application form). These burden hours have been reassigned to HHS's information collection approval for their Standard Form 424.
- OMB requested a clearer explanation of this information collection's scope and purpose. FTA has revised the justification statement to provide a more defined explanation of the need and purpose for this information collection. FTA is also including an excerpt from Circular FTA C 6100.1C Transit Research and Technology Programs: Application Instructions and Program Management Guidelines as an information collection because it is a large document. A link to the full text of the circular is also provided.
- All costs to the respondents are captured in the hourly burden. There are no additional costs to the respondents.
- In No. 8 of the justification statement, FTA has provided an example of the structure of agency staff meetings with constituent groups.

1. Circumstances that make the collection necessary.

The Secretary of Transportation is authorized by 49 U.S.C. Section 5312(a) to undertake or make grants or contracts (including agreements with departments, agencies, and instrumentalities of the United States Government) for research, development, and demonstration projects related to urban mass transportation that the Secretary decides will help improve mass transportation service or help mass transportation service meet the total urban transportation needs at a minimum cost. The Secretary may request and receive appropriate information from any source.

The information requested is necessary to evaluate applications and select projects for funding, ensure applicants meet eligibility requirements, make project awards, monitor grant requirements, disburse federal funds, evaluate project progress and results and determine the most effective means of sharing those results with a variety of customers in the public and private sectors.

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

Consistent with OMB Circular A102, Grants and Cooperative Agreements with State and Local Governments, or 2 CFR 215 Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations, all applicants for FTA research grants must complete the information requested in the Standard Form 424 as well as complete a statement of work describing the work to be carried out for the proposed project to apply for funding for a project. FTA places Notices of Funding Availability (NOFA) on grants.gov describing what types of research activities FTA is proposing to fund and announcing selection criteria under each announcement that needs to be addressed in the statement of work. FTA uses this information to evaluate and select the projects for funding that best support FTA's strategic goals and priorities and that offer the best technical and management approach, and are consistent with the specific objectives set forth in the NOFA. This information is also required to ensure applicants and the projects meet eligibility requirements and are in compliance with federal regulations.

Once a project has been selected and awarded, information is needed to ensure that the projects are being properly implemented, are achieving intended results on a timely basis, remain within approved budgets, and yield technical information of value to the federal government, the transit community and academia. Consistent with OMB Circular A102, Grants and Cooperative Agreements with State and Local Governments, or 2 CFR 215 Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations, recipients must submit quarterly progress reports, the Federal Financial Report, the SF-270 to request payment, as well as a final technical report summarizing the research results of the project. FTA project managers use this information to ensure the technical and financial aspects of the project and financial are proceeding in accordance with the grant requirements. The final technical report is used to share the results of the research with the transit industry.

3. Describe whether collection of information involves information technology and any consideration of using information technology to reduce the burden.

All grantees submit information requested under the Standard Form 424 as well as the proposed statement of work, quarterly progress reports and the Federal Financial Report electronically into FTA's electronic grant-making and management system known as TEAM. That system relies upon electronic signatures, with personal identification numbers. Grantees generally use computers to prepare technical and financial reports and it has increasingly become the practice for them to submit these reports in electronic form. FTA receives technical reports in electronic form to facilitate their posting on the FTA Web Site (www.fta.dot.gov). It is possible for a recipient to supply current information by updating prior versions of an electronic file and there is no technical or legal obstacle to this method.

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

FTA's transit research, development, demonstration, and deployment projects are quite specific and unlikely to be funded by any other sponsor, minimizing the likelihood of duplication. If recipients submit information to one FTA office, copies of that information generally suffice for purposes of other FTA offices. The information need not be regenerated or resubmitted.

The information requested is unique to each individual project, and information supplied for other projects or other purposes would not be relevant or pertinent. FTA staff is responsive to suggestions that available information, instead of newly generated information, be used for project administration purposes.

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

Small businesses or other small entities may keep their project applications and reports as brief as they deem fit, as long as they respond to the requirements set forth in the project work statement, sufficiently document their accomplishment of required tasks, and provide all of the legally required certifications and assurances.

6. Describe consequences to federal program or policy activities if the information were not collected or collected less frequently, as well as any technical or legal obstacles to reducing burden.

The information requested is consistent with requirements set forth under OMB Circular A102, Grants and Cooperative Agreements with State and Local Governments, or 2 CFR 215 Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations. It would be unreasonably risky for FTA to award projects without verifying the eligibility of projects and recipients for specific program funds. Information must be responsive to the individual project, and is collected only in connection with applications for or reports about each project. If not collected, FTA could not make the necessary determinations that projects and recipients are eligible for funds, would be ignorant of whether or not progress was being made in conducting the projects, and would not have access to the information resulting from the projects even though it is produced with taxpayer funds.

Any delay or curtailment in reporting frequencies would greatly hamper the ability of FTA's program managers to monitor project activities effectively. Experience has shown that noncompliance with progress reporting requirements results in loss of pertinent information by grantees and jeopardizes their ability to document and certify how funding was utilized.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with 5 CFR 1320.6.

The collection is consistent with 5 CFR 1320.6.

8. Describe efforts to consult with persons outside the agency to obtain their views.

Agency staff meets frequently with constituents groups to discuss projects, programs and priorities. For example, in 2007, 2008 and 2009, FTA held a one-day workshop with research recipients to discuss the grant requirements of the Common Rule. There have been no complaints regarding burdensome application procedures or too frequent progress and financial reporting.

A 60-day Federal Register Notice was published on June 1, 2009 (pages 26269 and 26270), soliciting comments prior to submission to the Office of Management and Budget (OMB). No comments were received. A 30-day notice was published on August 31, 2009 (pages 44899 and 44900).

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

No payment or gift is made to respondents, all of whom are the actual or prospective contractors and grantees, beyond reimbursement of the federal share of project costs as documented in the grant, cooperative agreement or contract.

10. Describe any assurance of confidentiality provided respondents.

Applications are reviewed by project managers. In rare cases, unsolicited proposals from private companies are also reviewed by the Office of Procurement. Any proprietary information contained in applications or proposals is protected during the project application review, award and administration processes. Once an award is made, information generated by the project is in the public domain unless exceptional arrangements have been negotiated for intellectual property involved in the project.

11. Additional justification for any questions of a sensitive nature.

No sensitive information is required.

12. Estimates of the hour burden of the collection of information and annualized cost to respondents.

Requirement	Number of Respondents	Frequency of Response (annual submissions)	Burden per Submission (labor-hours)	Annual Hour Burden (labor-hours)
Application Stage	100	1	79	7,900
Authorizing Resolution				
Opinion of Counsel				
Standard Assurances				
Project Description				
Project Budget				
Project Justification				
Completion of HHS's SF 424 (grants.gov application form)	100	1	1	(100)
Project Management Stage				
Quarterly Progress Report	200	4	2	1,600
Financial Status Report	200	4	2	1,600
Property Records/Biennial Certification	80	1	0.50	40
Total Hour Burden				11,140
Estimated hourly cost of preparing information collected				\$33 per hour
Estimated annualized cost to respondents for hour burdens				\$367,620

The figures below are representative of such an application meeting all of the criteria for funding under 49 U.S.C. Section 5312. Most applications are simple and straightforward. It is estimated that it takes 80 labor-hours to develop and submit an application to FTA for review. Since FTA receives approximately 100 applications per year, and since the average hourly salary of those engaged in preparation of such application is estimated to be \$33, cost to respondents is calculated as follows:

$$79 \text{ labor hours} \times 100 \text{ applications} = 7,900 \text{ hours} \times \$33 = \$260,700$$

$$\text{The total cost per application is } \$260,700/100 = \$2,607.$$

For project management activities, the following estimates are provided.

Quarterly Progress Reports: Staff time for preparation of these progress reports is estimated at 2 hours at an average cost of \$66 per report. There are 800 reports submitted annually (800 reports x 2 hours = 1,600 hours) and the cost is estimated at \$52,800 (800 reports x \$66).

Financial Status Report: Estimated staff time spent to prepare Financial Status Reports is 2 hours or \$66 per report. There are 800 such reports submitted annually (800 reports x 2 hours = 1,600) and the cost is estimated at of \$52,800 (800 reports x \$66).

Property Records/Biennial Certification: There are approximately 80 of reports annually and it is estimated that ½ hour is required for preparation of each (80 reports x ½ hour = 40 hours) and the cost is estimated at \$1,320 (40 hours x \$33).

The total annual cost to a typical project recipient for project management is thus \$106,820, or an average of about \$535 per project per year.

The grand total annual cost to the applicants and grantees is estimated at \$377,620 (\$260,700 + \$106,920).

The 100 burden hours (one hour per respondent) associated with the use of HHS's Standard Form 424 (grants.gov application form is shown above).

13. Estimate of total annual cost burden to respondents or record keepers resulting from the collection of information (not including the cost of any hour burden shown in Items 12 and 14).

The information collected and reviewed is required in the course of normal business and there is no additional cost beyond that shown in Items 12 and 14.

14. Estimates of annualized cost to the federal government.

Experience indicates that it takes approximately 4 labor-hours to review typical project applications or proposals. This assumes that the application is complete, noncontroversial, and fundable. Although aspects of each application may be reviewed by many different members of the FTA staff, from secretaries to the Administrator, it is estimated that the average level is GS-13/5, or \$47 per hour, or 4 labor-hours x \$47 per hour = \$188 per application. Since FTA receives approximately 100 applications each year, the cost to the federal government is 100 applications x \$188 per application = \$18,800.

Based on recent experience and ongoing budget constraints, FTA awards only approximately 50 new projects per year.

The cost to the federal government to manage new and previously approved projects is estimated as follows:

Quarterly Progress Reports: Review of a typical progress report should be completed within an hour by a GS-13. There are about 200 active projects requiring 4 reports per year; therefore, $200 \times 4 \times \$47 = \$37,600$ per year.

Financial Status Reports: Review of a typical Financial Status Report takes less than 1/2 hour by a GS-13 with an hourly wage of \$47. Since there are approximately 200 projects requiring four reports per year, the cost is $200 \times 4 \times 0.5 \times \$47 = \$18,800$ annually.

Vouchers and Requests for Payment: Review of a typical voucher or request for payment requires about one hour of work collectively by an accounting technicians, administrative assistant and program manager. Assuming a composite average grade of GS-11/5, at an hourly rate of \$33, and assuming monthly disbursements, the cost is $200 \times 12 \times \$33 = \$79,200$ annually.

Property Records/Biennial Certification: The cost to the federal government is minimal. Very little property or equipment is purchased with these project funds. In most cases, a letter stating that no property or equipment was purchased is submitted to FTA by the grantee at the completion of the project. Since all of these letters are received, reviewed, and filed, it is estimated that the 80 letters required by project managers consume less than 15 minutes of the time of a GS-13. Therefore, the cost is $80 \times .25 \times \$47$ or about \$940 annually.

In summary, the total annual cost to the federal government for reviewing these reports, requests for funds and applications is about \$155,340 per year ($\$18,800 + \$37,600 + \$18,800 + \$79,200 + \940).

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

The total number of burden hours associated with this submission is 11,140. A burden reduction of -100 hours from the last submission reflects a correction, appropriately accounting for burden associated with HHS's Standard Form 424 (grants.gov application form). These burden hours have been reassigned to HHS, under HHS's information collection approval for their Standard Form 424.

16. Plans for tabulation and publication for collections of information whose results will be published.

Research results reported will be published, typically in the form of individual project reports.

17. If seeking approval not to display the expiration date for OMB approval, explain the reasons.

There is no reason not to display the expiration date of OMB approval.

18. Explain any exception to the certification statement identified in Item 19 of OMB Form 83-I.

No exceptions are stated.