#### **DEPARTMENT OF TRANSPORTATION**

# INFORMATION COLLECTION SUPPORTING STATEMENT

## Uniform Safety Program Cost Summary Form for Highway Safety Plan OMB Control Number 2127-0003

### INTRODUCTION

The request is to obtain approval for the Uniform Safety Program Cost Summary Form, HS-217, which bears OMB Control Number 2127-0003.

# **JUSTIFICATION**

## 1. Explain the circumstances that make the collection of information necessary.

Under Section 402, each State shall have a highway safety program approved by the Secretary, designed to reduce traffic accidents and deaths, injuries, and property damage resulting, in order to receive formula grant funds. Under this program, States submit a Highway Safety Program and other documentation explaining how they intend to use the grant funds. In order to account for funds expended under this program, States are required to submit a Program Cost Summary (identified as the HS-217 form). This information collection supports the Department's ability to track and understand the States' uses of Federal funds, and to determine whether the uses are effective in addressing traffic safety problems.

#### 2. Indicate how, by whom, and for what purpose the information is to be used.

The data contained on the HS-217 form are collected by the States through a process which includes an analysis of traffic records, the identification of traffic safety problems, and the development of appropriate solutions. Specifically, the information reflects the State's proposed allocations of funds by program area, based on projects and activities identified in the State's Highway Safety Plan and traffic safety goals identified by the State. The Highway Safety Plan is required to be submitted by statute.

The data contained on the form are used for a variety of purposes by NHTSA and the State itself, serving as a record of the State's traffic safety activities that use Federal funding. In general, the data may be used for:

- Budget development /justification;
- Development of legislative proposals;
- Determining program impact;
- Program redirection;
- The exchange of program information;
- Incorporation into the contract obligating Federal funds;

- Monitoring highway safety activities; and
- Reporting to Congress.

## 3. Describe whether, and to what extent, the collection of information is automated.

During the past several years, numerous steps have been taken to reduce the burden of paperwork on the States. In all cases, the information is submitted electronically through the agency's grant tracking system, making revisions and updates generally easy to provide.

# 4. <u>Describe efforts to identify duplication.</u>

Because this information is unique, and has little value to others not associated with the managing and tracking of Federal grant funds for traffic safety purposes, there is virtually no possibility that this data is being collected through another source.

## 5. Describe efforts to minimize burden on small businesses.

The information in the Program Cost Summary is not collected from small businesses or other small entities; rather it is collected from State governments.

6. <u>Describe the impact if the collection of information is not collected or collected less frequently.</u>

Requiring a collection less frequent than what occurs now would reduce the agency's ability to responsibly track the use of grant funds each fiscal year and to make determinations about whether grant funds provided to the States are achieving their statutory purpose.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines set forth in 5 CFR 1320.6.

The procedures specified for this information collection are consistent with the guidelines set forth in 5 CFR 1320.6.

8. Provide a copy of the FEDERAL REGISTER document soliciting comments on extending the collection of information, a summary of all public comments responding to the notice, and a description of the agency's actions in response to the comments.

The agency published a 60-day Federal Register notice on March 30, 2011 (76 FR 17746) soliciting comments on the extension of the collection of information under 2127-0003. NHTSA received no comments.

The agency published a 30-day notice Federal Register notice on June, 22, 2012 (77 FR 37739).

Given that this is not a new collection, States are very familiar with the process of using the Program Cost Summary to identify and track uses of Federal grant funds. The agency does not expect to receive any comments on this collection of information.

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

This item is not applicable. No payments or gifts are provided to the respondents.

10. Describe any assurance of confidentiality provided to respondents.

This item is not applicable. The information is collected from public documents, records and other sources and is not subject to confidentiality.

11. Provide additional justification for any collection of sensitive information.

This item is not applicable. There is no personal information collected.

12. Provide estimate of the burden hours for the collection of information requested.

During the fiscal year the States prepare a HS-217 Form initially and anytime they change the funding category amounts. States will produce approximately twenty HS-217's annually. It takes approximately  $\frac{1}{2}$  hour or less to complete the document. Therefore: 20 documents x  $\frac{1}{2}$  hour = 10 hours/state/year x 57 States/Entities = 570 hours for all States. Assuming the average salary of these individuals is \$50.00 per hour, and the State only spends 10 hours annually to produce the document, then the cost associated with the burden hours are \$28,500 (\$500 a year x 57 State/Entities).

13. Provide estimate of the total annual cost burden.

Not applicable. There are no capital, start-up or annual operation and maintenance costs involved with the collection of information.

14. Provide estimates of annualized cost to the Federal Government.

The estimated annualized costs to the Federal Government are based on the amount of time spent on review by program staff in the Office of Regional Operations and Program Delivery. We estimate that at an average cost of \$50 per hour and an estimated level of 10 hours per respondent, the total cost, if every State applies for each grant program, would be \$28,500.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14.

The program changes are a result of this ICR being reinstated, there's an additional 570 hours added to NHTSA's overall burden hour total.

16. For collections of information whose results will be published, outline plans for tabulation, and publication.

This item is not applicable. There are no plans to publish this information.

17. <u>If seeking approval to not display the expiration date for OMB approval of the information collection</u>, explain the reasons that display would be inappropriate.

Approval is not being sought to not display the expiration date for OMB approval of the information collection.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-1.

There are no exceptions.