# **Supporting Statement**

# Study of the Feasibility of Element-level Bridge Inspection for Non-National Highway System Bridges

#### Introduction:

The "Moving Ahead for Progress in the 21st Century Act" or the "MAP–21" legislation, Section 1111, modified 23 U.S.C 144 to include a requirement for FHWA to complete a study on the benefits, cost-effectiveness, and feasibility of requiring element level inspection for highway bridges not on the National Highway System (NHS). Results of the study are to be reported to Congress.

In order to conduct the study, FHWA needs to gather information from various bridge managers who are knowledgeable on bridge inspection practices and element level inspections. Element level inspections represent an approach that gathers more detailed information during an inspection than the more traditional component-based approach. A questionnaire will be utilized to gather the information for this one-time new data collection. Once the data is collected, it will be analyzed with respect to the feasibility, cost-effectiveness, and benefits of element level bridge inspection information and summarized into a Report to Congress.

#### Part A. Justification.

# 1. Circumstances that make collection of information necessary:

The "Moving Ahead for Progress in the 21st Century Act" or the "MAP–21" legislation, Section 1111, modified 23 U.S.C 144 to include a requirement for each State and appropriate Federal agency to report element level bridge inspection data to the Secretary, as each highway bridge is inspected, for all highway bridges on the NHS. The data is to be reported to the Federal Highway Administration (FHWA) not later than 2 years after the date of enactment of MAP-21. Additionally, MAP-21 included a requirement for a study on the benefits, cost-effectiveness, and feasibility of requiring element level data collection for highway bridges not on the NHS. Information needed to conduct this study resides with the managers of highway bridges, namely state and local transportation departments, as well as other highway bridge owners and users of bridge data.

The study aligns with the State of Good Repair goal in the DOT strategic plan. Element level bridge inspection data provides detailed condition information on bridges and is an integral part of decision-making as part of an overall asset management plan.

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

The FHWA intends to conduct the study by utilizing a contractor to gather information using a targeted questionnaire. The contractor will use the information gathered to assess the benefits, cost-effectiveness and feasibility of element level bridge inspection data collection on non-NHS highway bridges, and to develop a report that summarizes the results of their assessment.

# 3. Extent of automated information collection:

It is anticipated that the questionnaire will be distributed electronically via email. Responses by email will be encouraged. It is estimated that 100% of the responses will be provided in electronic format.

# 4. Efforts to identify duplication:

The benefits, cost-effectiveness, and feasibility of element level bridge inspection data collection on non-NHS highway bridges has never been studied before. There is minimal chance of duplication of effort. If any relative information exists within a particular agency, it will be revealed during the questionnaire phase and utilized, as appropriate, during the overall study.

#### 5. Efforts to minimize the burden on small businesses:

The collection of information in support of the legislatively mandated study will not place any burden on small businesses.

## 6. Impact of less frequent collection of information:

This request pertains to a one-time data collection in support of a legislatively mandated study. It is not a recurring data collection.

#### 7. Special circumstances:

No special circumstances apply to this data collection.

## 8. Compliance with 5 CFR 1320.8:

The Federal Register notice that solicited public comments for a 60-day period was published on March 22, 2013. Vol. 78/56, page 17747.

## **Analysis of Federal Register Notice Comments**

Comments on the March 22, 2013, Federal Register notice were received from thirty commenters. Twenty-two of the commenters represented county agencies, seven represented State Departments of Transportation, and one represented a Federal Agency. Seventeen County representative comments were from Iowa. Two commenters were from the same local agency in Michigan. Nearly all comments focused on the feasibility, benefits, and cost-effectiveness of element level bridge inspection data collection on non-National Highway System (non-NHS) bridges rather than on the actual data collection to be done as part of the legislatively mandated study. The purpose of the notice was to gather comments on the actual data collection to be done during the study. One commenter addressed the study data collection effort. The Iowa Department of Transportation stated that the study is necessary because the FHWA needs to be aware of the unique issues facing the various jurisdictions in the nation. They concurred in the estimate of two hours to respond to questions as part of the study. They recommended the use of a few standardized questions to help with clarity and usefulness of the data and noted that an on-line response to questions would expedite the collection and analysis of the data. The FHWA will consider these suggestions as it undertakes the study.

The comments that offered opinions on the benefits, costs, and feasibility of element data collection on non-NHS bridges will be considered during the actual study.

## 9. Payments or gifts to respondents:

The respondents will not receive any gifts or payments for the information provided in response to the questionnaire.

## 10. Assurance of confidentiality:

There is no statutory, regulatory, and agency policy basis for assurance of confidentiality with respect to the information collected.

# 11. Justification for collection of sensitive information:

No sensitive information will be collected as part of this effort.

# 12. Estimate of burden hours for information requested:

There will be an estimated 100 respondents to the questionnaire. Respondents include State and selected local transportation agencies, American Association of State Highway and Transportation Officials, National Association of County Engineers, toll authorities, Federal bridge-owning agencies, and offices within FHWA. Each questionnaire is anticipated to require 2 hours to complete, for a total of 200 estimated burden hours. Since this is a one-time data collection, the only costs will be the salaries of those who are tasked with completing the questionnaire.

# 13. Estimate of total annual costs to respondents:

There are no costs beyond those mentioned in item 12.

#### 14. Estimate of cost to the Federal government:

A contractor will be utilized to conduct the study (\$75,000).

## 15. Explanation of program changes or adjustments:

This is a new information collection.

# 16. Publication of results of data collection:

Results of the data collection will be assessed by a contractor and summarized in a report to the FHWA at the completion of the overall study. Results of the study are to be reported to Congress.

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

The FHWA is not requesting approval for not displaying the expiration date.

#### 18. Exceptions to certification statement:

The FHWA is not requesting exceptions to the certification statement.