

DEPARTMENT OF TRANSPORTATION

Federal Transit Administration

JUSTIFICATION STATEMENT

Transit Investments in Greenhouse Gas and Energy Reduction Program
OMB Control No. 2132-0566

This justification statement is a request for revision of a currently approved information collection.

1. CIRCUMSTANCES THAT MAKE THE COLLECTION NECESSARY.

The Federal Transit Administration (FTA) provides financial assistance to public transportation authorities through the Transit Investments in Greenhouse Gas and Energy Reduction (TIGGER) Program.

To meet the requirements of the American Recovery and Reinvestment Act (ARRA) of 2009, FTA requested an emergency approval from the Office of Management and Budget (OMB) for the Transit Investments in Greenhouse Gas and Energy Reduction (TIGGER) Program. OMB approved FTA's request for emergency approval on March 10, 2009, with an extension granted on December 10, 2009, and then approved FTA's request for 3 years under the regular approval process. This approval expires on September 30, 2013.

The provisions of the American Recovery and Reinvestment Act of 2009, Title 49 U.S.C. Chapter 53, 49 C.F.R. Part 18, the Uniform Administrative Requirements for Grants and Cooperative Agreements to State and local governments (the Common Grant Rule), and prudent administration of federal grant funds dictate that grantor agencies review applications for federal assistance to assure eligibility and other criteria, as appropriate, and monitor approved projects to ensure timely expenditure of federal funds by grant recipients. Information collected under this program is structured to comply with federal mandates. The reporting requirements are now submitted by recipients in two stages: the project management stage and the project evaluation stage.

Annual Certifications and Assurances. Before FTA may award a federal grant, the applicant must provide FTA with all certifications and assurances required by federal laws and regulations for the applicant or project. A grant applicant must sign the appropriate certifications and assurances each year for all anticipated grant applications during that particular fiscal year.

Project Management Stage

The reporting requirements under this stage are necessary to ensure the proper and timely expenditure of federal funds within the scope of the approved project. The requirements comply with the Common Grant Rule and are contained in FTA Circular 5010.1D, “Grant Management Requirements” and may also be included in sections of the grant contract. These reporting requirements are:

- a. Milestone/Progress Reports (QPR). These narrative reports are required quarterly for areas over 200,000 populations and annually for areas less than 200,000. They define problems, and milestone achievements are reported to FTA. The reports greatly reduce the need for on-site visits by staff.
- b. Financial Status Reports (FSRs). These quantitative reports are required quarterly for areas over 200,000 and annually for areas under 200,000. They provide a financial picture of project activity. The reports include information regarding obligations, payments, receipts, and other pertinent financial data required to ensure proper expenditure of federal funds.
- c. Reports of Significant Events. Unforeseen events that impact the schedule, cost, capacity, usefulness or purpose of the project should be reported to FTA immediately after detection and then reflected in the next quarterly progress or annual report.
- d. Pre-award and Post-delivery Rolling Stock Audits. The audits are required to be performed by FTA grantees purchasing rolling stock. These audits are intended to ensure compliance with various requirements, such as Buy America, and to detect any vehicle defects while the vehicle is under warranty. Grantees certify compliance with the audit requirements under the implementing rule that was published in September 1991.

Project Evaluation Stage

The reporting requirement under this stage is necessary to assess program effectiveness for the federal government in both the Executive and Congressional branches. This electronic database report is collected annually from grantees and provides information regarding how the project is performing in achieving national program objectives. Information is provided regarding actual energy use and greenhouse gas emission reductions and associated reductions in operating costs. This information permits federal Executive and Congressional evaluation of the program.

2. HOW, BY WHOM, AND FOR WHAT PURPOSE THE INFORMATION IS TO BE USED AND CONSEQUENCES IF THE INFORMATION IS NOT COLLECTED.

The reports are submitted annually through FTA’s Transportation Electronic Management and Award (TEAM) system. The information submitted ensures FTA's compliance with applicable federal laws and the Common Grant Rule. In addition, without these reports, significant resources and manpower would be necessary to conduct on-site inspections.

Finally, the evaluation report permits an assessment of program effectiveness for the federal government in both the executive and congressional branches.

This information collection also satisfies the environmental stewardship goal in the Departmental Strategic Plan.

3. CONSIDERATION OF IMPROVED INFORMATION TECHNOLOGY TO REDUCE BURDEN AND ANY TECHNICAL OR LEGAL OBSTACLES TO REDUCING BURDEN.

FTA's electronic grant making and management system is a paperless, electronic grant application, review, approval, acceptance and management process. All TIGGER grants and periodic reports are submitted electronically. Grantees also use the electronic system for signature of annual certifications and assurances.

4. DESCRIBE EFFORTS TO IDENTIFY DUPLICATION. SHOW SPECIFICALLY WHY ANY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED OR MODIFIED FOR USE FOR THE PURPOSES DESCRIBED IN ITEM 2.

The reports are project specific and the information is not available elsewhere. There is no duplication.

5. METHODS USED TO MINIMIZE BURDEN ON SMALL BUSINESSES OR OTHER SMALL ENTITIES.

The information collected does not involve small business.

6. CONSEQUENCES TO FEDERAL PROGRAMS OR POLICY ACTIVITIES IF INFORMATION WAS NOT COLLECTED OR COLLECTED LESS FREQUENTLY, AS WELL AS ANY TECHNICAL OR LEGAL OBSTACLES TO REDUCING THE BURDEN.

If these and other reports were required less frequently, additional site visits by agency staff would be required to ensure compliance with program objectives. Additionally, the agency would not be able to effectively evaluate the program in accordance with the Government and Performance and Results Act.

7. SPECIAL CIRCUMSTANCES THAT REQUIRE THE COLLECTION TO BE CONDUCTED IN A MANNER INCONSISTENT WITH 5 CFR 1320.6.

The information collected is consistent with the guidelines in 5 CFR 1320.6.

8. EFFORTS TO CONSULT WITH PERSONS OUTSIDE THE AGENCY TO OBTAIN THEIR VIEWS.

FTA has worked with grantees on reporting requirements in shaping its reporting system and offers an opportunity for all grantees to comment on its methodologies.

A 60-day Federal Register notice was published on May 17, 2013 (pages 29204 and 29205), soliciting comments prior to submission to OMB. A 30-day Federal Register notice was published on August 21, 2013 (pages 51811 and 51812).

9. EXPLAIN ANY DECISION TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS, OTHER THAN REMUNERATION OF CONTRACTORS OR GRANTEES.

No payment is made to respondents.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED RESPONDENTS.

There is no assurance of confidentiality regarding these submissions.

11. ADDITIONAL JUSTIFICATION FOR QUESTIONS OF A SENSITIVE NATURE.

None of the information is of a sensitive nature. Congress through the Government Accountability Office has required an evaluation of this program every six months and a formal written report annually.

12. ESTIMATE OF THE HOUR BURDEN OF THE COLLECTION AND ANNUALIZED COST TO RESPONDENTS.

<u>Requirements</u>	<u># of Annual Submissions</u>	<u>Burden hours per Submission</u>	<u>Total Burden hours</u>
<u>Project Management Stage</u>	87	156	13,572
<i>(includes all of the following)</i>			
Progress Report			
Financial Status Report			
Cost Allocation Plans			
Total			13,572
<u>Annual Evaluation Report</u>	87	40	3480
Total			3480
Grand Total			17,052

All burden hour estimates are based on a comprehensive review of all the requirements associated with the TIGGER program and, discussions with appropriate Headquarters and Regional staff, and analysis of other FTA programs.

The annual respondents used to calculate total annual burden on the OMB Form 83-I include all the respondents who complete quarterly and annual reports. Included in this figure is the number of annual applicants who must submit quarterly and annual reports and the active grants from previous years.

Estimate of the cost to respondents:

The hourly burden to respondents is outlined in the preceding paragraphs; however, there are no additional costs to respondents other than those reflected. While FTA provides an estimate below (approximating annual cost of the burden hours), for the purposes of burden calculation for this collection, all respondent costs are reflected in terms of burden hours. Therefore, the annual cost to respondents as reflected in the summary of burden is \$0. Previously approved versions of this collection erroneously counted both burden hours and monetized burden hours, overestimating the burden impact.

Project Management Stage:

Staff time devoted to the preparation of Project Management reports takes approximately 156 hours at an average salary of \$30 per hour or \$4,680 per report. There are expected to be 87 reports annually; therefore, the cost is estimated to be (156 hrs. x 87 reports. x \$30 = \$407,160.

Evaluation Stage:

There are approximately 87 applicants that are required to submit an annual evaluation report and we estimate that it will take approximately 40 burden hours per submission.

Therefore, the cost is estimated to be \$104,400 (87 applications x 40 hours =3,480 hours. \$30 per hour x 3,480 hours =\$104,400.)

The grand total cost to the respondents for both the program management and evaluation stage is \$511,560 (\$407,160 + \$104,400).

13. ESTIMATE OF TOTAL ANNUAL COST BURDEN TO RESPONDENTS OR RECORDKEEPERS RESULTING FROM THE COLLECTION OF INFORMATION (NOT INCLUDING THE COST OF ANY HOUR BURDEN SHOWN IN ITEMS 12 AND 14).

There is no additional cost beyond that shown in items 12 and 14.

14. ESTIMATE OF THE ANNUALIZED COST TO THE FEDERAL GOVERNMENT.

The cost is calculated as follows:

Project Management Stage:

Individuals managing projects throughout FTA vary from GS-9 to GS-14; however, in looking at the averages it can take a GS-13 (average salary, \$42 per hour) about ½ hour per report to review it. There are approximately 87 projects requiring reports annually. The cost to the federal government is \$1,827 (1/2 hr. x 87 submissions x \$42 per hour = \$1,827).

Annual Evaluation Stage:

Grantee performance information is submitted electronically and annually to FTA through FTA's TEAM system. This information will be summarized by FTA staff or a contractor and posted for the public. FTA estimates that one staff person at the GS-13 level will devote approximately 481 hours to this task, totaling \$20,202 (481 hours x \$42 per hour = \$20,202).

The total cost to the federal government is \$ \$22,209 (\$1,827 + \$20,202 = \$22,209).

15. EXPLAIN REASONS FOR CHANGES IN BURDEN, INCLUDING THE NEED FOR ANY INCREASES.

The total number of burden hours decreased from 31,880 hours for the previous request to 17,052 hours for this request, representing a reduction of 14,828 hours. The decrease in burden hours is primarily due to the completion of the application stage within the program and more accurate program management and reporting.

16. PLANS FOR TABULATION AND PUBLICATION FOR COLLECTIONS OF INFORMATION WHOSE RESULTS WILL BE PUBLISHED.

FTA plans to publish the results of the information collected for statistical use and use by grantees.

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 EXCEPTIONS TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19 OF OMB FORM 83-I.

No exceptions are stated.