

## SUPPORTING STATEMENT

### PLANNING AND RESEARCH PROGRAM ADMINISTRATION

**Introduction:** This request is for OMB's three-year renewal of a currently approved information collection titled, "Planning and Research Program Administration." This information collection is covered by OMB Control No. 2125-0039 and is scheduled to expire on May 31, 2014.

#### A. Justification

##### 1. Circumstances that make the collection of information necessary:

Planning and Research Program Administration is covered under 23 CFR Part 420. 23 CFR Part 420 regulation includes administrative requirements and procedures for PL funds (23 USC 104(b)(5)) provided for Metropolitan Planning Organizations (MPOs) to carry out metropolitan planning, and SPR funds (provided under the provisions of 23 U.S.C. 505) for State Departments of Transportation (State DOTs) to implement statewide transportation planning and research, development and technology (RD&T) work activities. Also, at a State DOT's option, other Title 23 funds as identified in the definition of FHWA planning and research funds in 23 U.S.C. 505 and 23 CFR 420.103 may be used to perform planning activities. Different from this request, the information collection requirement for work performed by MPOs is a joint Federal Highway Administration/Federal Transit Administration requirement, and is covered under OMB Control Number 2132-0529.

In accordance with government-wide grant management procedures, a grant application must be submitted for these funds. In addition, recipients must submit periodic progress and financial reports. The content and frequency of submission of progress and financial reports specified in 23 CFR Part 420 is as specified in 2 CFR 200 grant management regulations. With the implementation of 2 CFR 200, the focus will be more on using data to determine the grant's achievement outcomes and less on accountability compliance. FHWA and the State DOTs are called upon to identify clear performance goals, indicators and milestones for the grants.

This information collection supports the DOT's Strategic Objective of "Organizational Excellence" by providing an ongoing mechanism to review applications and approve Federal grants to States for their transportation planning and research, development and technology work programs.

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

In lieu of Standard Form 424, "Application for Federal Assistance", the FHWA uses a "work program" as the grant application that includes a scope of work and budget for activities to be undertaken with FHWA planning and research funds. The information contained in the work program includes task descriptions, assignments of responsibility for conducting the work effort, and estimated costs for the tasks. This information is necessary to determine how the FHWA planning and research funds will be utilized by the State DOTs and if the proposed work is eligible for Federal participation.

The information is used by FHWA field staff to evaluate a State DOT's proposed transportation

planning and RD&T activities and budget not only to determine the federal participation eligibility but also to monitor performance and progress. FHWA authorization to proceed with the proposed work constitutes a contractual obligation of the Federal government. In addition, this information is used by FHWA headquarters staff to monitor the nationwide transportation planning and RD&T efforts and for evaluating the adequacy of the Federal-aid funding.

Information in the periodic progress and financial reports are used by FHWA field staffs to monitor and evaluate State DOT performance of authorized work. The work program, along with the periodic progress and financial reports, are the FHWA's primary tools for administering FHWA planning and research grants to State DOTs, and are used to ensure adequate performance and progress are being made. The grant information further aids FHWA in carrying out their oversight duties by identifying all eligible Federal and non-Federal activities that supports transportation planning, and RD&T programs. Without this information, there would be no basis for the approval or disapproval, and subsequent reimbursement of Federal funds.

### **3. Extent of automated information collection:**

States currently have the option to submit their work plans and financial reports electronically to the FHWA. The State DOTs and FHWA field staff has the flexibility to determine the extent of detail and format for their submissions. The FHWA does specify the minimal information that must be included, but not in any uniform format that could be automated. FHWA estimates 70% of the responses will be automated.

### **4. Efforts to identify duplication:**

Some State DOTs prepare work programs and periodic progress and financial reports for transportation planning and RD&T activities performed with their own and other funding sources. Similarly, some State DOTs have written a set of RD&T program administration procedures. To the extent that the information required by 23 CFR Part 420, the FHWA field offices will accept existing State documents that adequately covers the work performed with FHWA planning and research funds or the State's RD&T administration procedures in lieu of preparing separate documents for FHWA's approval and use.

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

This information collection does not involve small businesses.

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

Annual progress and financial reports are the minimum acceptable. Less frequent reporting would not allow reasonable monitoring of compliance with conditions of the grants.

The FHWA planning and research fund program is a continuing program based on FHWA approval of periodic work programs, which may cover more than one State DOT fiscal year. Those State DOTs that submit a biennial work program do not need to prepare a new work program, unless there will be significant changes in proposed work, but still must request authorization of Federal funds for the second continuing year. Because of the uncertainty of work activities and necessary funds, work programs longer than 2 years would probably not result in a significant reduction of burden since they would probably need extensive revision to

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reflect changing emphases.

**7. Special circumstances:**

There are no special circumstances associated with this information collection.

**8. Compliance with 5 CFR 1320.8:**

The FHWA published a Federal Register notice on January 17, 2014, vol. 79/12, pages 3264-3265, which solicited public comments on our intent to seek OMB's renewed approval for this information collection. No comments were received.

**9. Payment of gifts to respondents:**

No payments or gifts are provided to respondents.

**10. Assurance of confidentiality:**

None of the information is considered confidential; it is all available to the public.

**11. Justification for collection sensitive information:**

None of the information required is of a sensitive or private nature.

**12. Estimate of burden hours for information collected:**

**a) Annual burden to respondents:**

Each State, the District of Columbia and the Commonwealth of Puerto Rico are required to provide information. The annual number of burden hours (professional and clerical staff) per respondent for preparation of work programs and progress and financial reports is estimated to be 720 (18 weeks x 40 hours per week). The total annual burden for all respondents is estimated to be 37,440 burden hours (720 burden hours per respondent times 52 respondents).

This annual burden consists of staff time of each respondent for preparation of the work programs, and progress and financial reports. For those respondents that elect to use biennial work programs, the burden for preparation of work programs would be significantly less for the second year. The burden was determined as follows:

Professional staff time for preparation of work programs:

$$400 \text{ hours/respondent} \times 52 \text{ respondents} = 20,800 \text{ hours}$$

Professional staff time for preparation of progress and financial reports:

$$120 \text{ hours/respondent} \times 52 \text{ respondents} = 6,240 \text{ hours}$$

Clerical staff time:

$$200 \text{ hours/respondent} \times 52 \text{ respondents} = \frac{10,400 \text{ hours}}{37,440 \text{ hours}}$$

**b) Annual associated salary cost to respondents:**

The annual associated salary cost to respondents is estimated to be \$1,618,344 based on an average salary of \$38.00 per hour (approximately \$79,000<sup>1</sup> per year) for professional staff and \$18.20 per hour (approximately \$37,780<sup>2</sup> year) for clerical staff.

Professional staff cost for preparation of work programs:

$$20,800 \text{ hours} \times \$38.00 \text{ per hour} = \$790,400$$

Professional staff time for preparation of progress and financial reports:

$$6,240 \text{ hours} \times \$38.00 \text{ per hour} = \$237,120$$

Clerical staff time:

$$10,400 \text{ hours} \times \$18.20 \text{ per hour} = \$189,280$$

In summary:

Professional Staff (Work Program)	\$790,400
Professional Staff (Progress/Financial Report)	\$237,120
Clerical Staff	\$189,280
<i>Subtotal Direct Salaries</i>	\$1,216,800
Overhead/fringe benefits at 33%	\$401,544
<i>Total annual respondent cost</i>	\$1, 618,344

**13. Estimate of total annual costs to respondents:**

There are no other costs to respondents other than those identified under item 12.

**14. Estimate of cost to the Federal Government:**

The cost to the Federal Government consists of the staff time and related expenses for review of the work programs, monitoring of work performed, and general oversight activities. The Government will incur an annual estimated cost of approximately \$594,633, as follows:

Professional staff time for review of work programs:

$$2.5 \text{ person-years (2.5 weeks per respondent} \times 52 \text{ respondents) per year times an average salary of } \$79,000 = \$197,500$$

Professional staff time for monitoring of performance:

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1 person-year (1 week per respondent x 52 respondents) per year times an average salary of \$79,000 = \$79,000

Professional staff time for oversight:

2 person-years (2 weeks per respondent x 52 respondents) per year times an average salary of \$79,000 = \$158,000

Clerical staff time:

1/3 person-year (1/3 week per respondent x 52 respondents) per year at an average salary of \$37,780 = \$12,593

In summary:

Federal direct salary (review)	\$197,500
Federal direct salary (monitoring)	79,000
Federal direct salary (oversight)	158,000
Clerical staff	12,593
<i>Total direct salary cost:</i>	\$447,093
Overhead/fringe benefits at 33%:	147,540
<i>Total annual Federal agency cost:</i>	\$594,633

**15. Explanation of program changes or adjustments:**

With implementation of 2 CFR 200, there will be an anticipated learning curve of the new grant administration regulation. The focus of the new grant rule has added several new focus areas: enhanced performance monitoring, risk-based assessment on the grant audits, and streamlining of the cost principles. The 2 CFR 200 also changed how subgrants will be managed. The grantee will have to provide and strengthen their oversight of their subgrantees. The increased grant administration burden are equally distributed to the MPO, State DOTs and FHWA, and will take more time to manage, document, and resolve than in the past years.

In addition, MAP-21 has new requirements for the planning programs. The new requirements included performance-based planning and programming (PBPP). These two elements will require more planning data and reporting systems to support the performance management. To design the work tasks and to identify how these components will need to interface with current planning process, will take time, and efforts by State DOTs and MPOs.

**16. Publication of results of data collection:**

There are no plans for publishing the information collected under this requirement.

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

Approval for not displaying the expiration date is not being requested.

**18. Exceptions to certification statement:**

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



<sup>1</sup> The annual salary from the Bureau of Labor Statistics for the [Architecture and Engineering Occupations](#) is listed at \$79,000 for 2012.

<sup>2</sup> The annual salary from the Bureau of Labor Statistics for Secretaries and Administrative Assistants is listed at \$37,780 for 2012.