

**Department of Transportation
Office of the Chief Information Officer**

**SUPPORTING STATEMENT
Annual Grant Program Effectiveness Survey**

The Federal Motor Carrier Safety Administration (FMCSA) prepared this Supporting Statement for the Office of Management and Budget (OMB) review and approval of a new information collection request (ICR) entitled, “*FMCSA Annual Grant Program Effectiveness Survey*.”

Section A. Justification:

1. Circumstances that make collection of information necessary.

The Federal Motor Carrier Safety Administration (FMCSA) needs a survey of its State partners who support the operation, regulation, and enforcement of various mutually-beneficial safety programs. This knowledge will improve the Federal government’s understanding of the effectiveness of commercial motor vehicle (CMV) safety related grant programs. FMCSA is interested in surveying grant recipients to collect information on the strengths, weaknesses, and effectiveness of FMCSA grant programs.

The Secretary of Transportation is authorized to conduct studies pertaining to commercial motor vehicle safety in 49 U.S.C. 504 (Attachment A), and 49 CFR 1.87 (Attachment B).

In 2009, the Government Accountability Office (GAO) issued a final report entitled, “Motor Carrier Safety: Commercial Vehicle Registration Program Has Kept Carriers from Operating, but Effectiveness Is Difficult to Measure, GAO-09-495,” (Attachment C). The GAO recommended that FMCSA measure the effectiveness of one of its grant funded programs called the Performance Registration Information Systems Management (PRISM).

This ICR is consistent with 2 CFR Chapter I, and Chapter II Parts 200, 215, 220, 225, and 230 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards,” Final Rule (78 FR 78590), December 26, 2013 (Attachment D) which requires Federal Agencies to monitor grants. OMB Circular A-110, Reports and Records, sections 50 through 53 (Attachment E) set forth the procedures for monitoring and reporting on the recipient's financial and program performance and the necessary standard reporting forms.

Monitoring and evaluating FMCSA grant programs support the following Department of Transportation FY 2014-2018 STRATEGIC OBJECTIVE:

“Improve the safety of the transportation system by addressing behavioral, vehicle, and infrastructure safety issues through prevention, mitigation, and response using innovative and effective partnerships, programs, and resources.”

FMCSA proposes to collect the data for this project via electronic mail surveys and through the occasional use of clarifying interviews. The information collection supports the DOT’s Strategic Goal of Safety, and will help confirm whether the program(s) improve public health and safety by reducing transportation-related fatalities and injuries. Therefore, the purpose of this IC is to

conduct a survey to evaluate the effectiveness of specific grant programs through the use of in-person interviews and electronic surveys. The survey will not be statistical in nature, as the intention is to secure information from 100 percent of the participating State-partners. FMCSA intends to use the information collection to assess the impacts of proposed rules, potential improvements in its grant supported safety programs, and provide data to support future budget decisions.

2. How, by whom, how frequently, and for what purpose the information used.

- (a) (How) FMCSA intends to collect this information principally by surveying all FMCSA State grant recipients and to interview some or all of the survey recipients which propose best practices or offer ideas which may require additional discussion. The survey will not exceed 40 questions and the complexity will be Likert scale and short responses. The decision to use the Likert scale over say the ordinal scale is because the numbers in the ordinal level indicate the relative position of items, but not the magnitude of difference that you get from the Likert scale. For example, the survey will present a question such as, "The grant funding provided in support of your program is adequate to meet all aspects of the mission." The response options may include:

1. Strongly disagree
2. Disagree
3. Neutral
3. Agree
4. Strongly agree
5. Not Applicable

The Agency will use the interview technique on a by exception basis as a tool to fill in any gaps created by short answers that could translate into best practices or ideas that address areas for improvement.

- (b) (By Whom) The Agency seeks the perspective of its State partners which benefit from the use of any of its grant programs past and present to assist FMCSA identify the impacts of, and perceptions to, certain rulemakings requirements, the current use of the grant funding, and ideas on improving or removing aspects of existing grant programs.
- (c) (How Frequently) FMCSA would like to survey its state partners annually using Form MCSA-5888. The results of this effort will allow FMCSA to track trends in performance and identify opportunities to improve. There is currently no established comprehensive methodology for the Agency to obtain input from our State partners for the purpose of performance measurement and process improvement. The Agency will aggregate the results of the information collection into tables to show results across all respondents. The agency will use this information to establish a baseline of our grant programs from the grantee's perspective for use in future grant-related decision making.

The Agency estimates that the review will take less than one hour per year to complete. The majority of our State partners will not be subject to an additional interview as they will be conducted on a by exception basis.

3. Extent of automated information collection.

The Agency proposes to collect the information through the use of electronic mail and by interviewing selected State grant recipients. One hundred (100%) percent of the responses will be accepted electronically (e.g., via the Internet). The Agency would like to reserve the opportunity to conduct telephone or face-to-face interviews of the grant recipients. The Agency employees will use electronic media to enter any answers provided by State representatives during face-to-face or telephone interviews. The Agency believes this approach will have the least burden on the respondents, all of whom already communicate with the Agency electronically to satisfy existing grant-related award requirements.

4. Efforts to identify duplication.

The Agency's desire to collect information through a survey does not exist in any other form, and the Agency is not aware of any similar surveys which specifically address this matter. Fortunately, this information would be useful to meet the needs of several FMCSA offices like the Agency's Enforcement Program Office, Policy Office, Office of Field Operations, and the Office of Governmental Affairs; none of them have initiated a similar action in recent memory. Open communication solicited from willing participants will go a long way towards ensuring the Agency is current and fully aware of the expectations of current and possibly future grant recipients.

5. Efforts to minimize burden on small businesses.

This information collection does not impact small businesses or small entities. The targeted population for this ICR are State operated public offices that benefit from FMCSA grant programs. These State offices include the States' Office of Protective Services (Sherriff and Police Services), the Office/Department of Motor Vehicles (DMVs), and/or the State Office of Revenues. Our target audience is the public sector and not the private sector in any way. FMCSA does not consider the information request to be unduly burdensome, since we estimate that the response time for the survey instrument will not exceed one hour annually. The Agency has limited the survey to include only the absolutely necessary questions.

6. Impact of less frequent collection of information.

Without this survey, FMCSA would not be able to characterize the relative success of its grant programs from the perspective of the recipients who best know the program's frailties and strengths. The information collection will assist FMCSA determine whether there is a consensus regarding best practices, program weaknesses, and ideas to improve the program's impact on the regulated commercial motor carrier community.

7. Special circumstances.

There are no special circumstances related to this information collection.

8. Compliance with 5 CFR 1320.8.

On 8 October 2014, FMCSA published a notice in the Federal Register (79 FR 60889) with a 60-day public comment period to announce this new ICR and request comments from the public (Attachment F). The agency received no comments in response to this notice. On January 16, 2015, FMCSA published a notice in the Federal Register (80 FR 2470) with a 30 day public comments period to announce that this new ICR would be sent to OMB for approval and request comments from the public (Attachment G).

9. Payment or gifts to respondents.

The Agency approach does not include the offer of a gift in conjunction with this data collection.

10. Assurances of Confidentiality.

This collection will be kept private to the extent possible under law.

11. Justification for collection of sensitive information.

This information collection does not involve any data of a sensitive nature. Additionally, the Agency will inform the respondents that they do not need to answer any questions they consider sensitive.

12. Estimates of burden hours for information requested.

The information collection is limited to public organizations. The Agency estimates that the annual information collection burden to be 45 minutes per State grant respondent, as determined through pre-testing of an initial survey on nine State respondents using Form MCSA-5888. The information collection seeks responses from 50 State representatives via an electronic mail survey and authority to ask clarifying questions of respondents via in-person or telephone interviews. The hourly burden for this information collection activity is estimated as follows:

Electronic mail-in: Response burden is estimated at 45 minutes per respondent to answer survey questions. The estimated annual burden for this information collection activity is **38 hours** [50 respondents x 45 minutes/60 minutes = 37.5 hours rounded to 38].

State Personnel Interviews: Response burden is estimated at 30 minutes per respondent to answer clarifying questions. The estimated annual burden for this information collection activity is **25 hours** [50 respondents x 30 minutes = 25 hours].

Estimated Total Annual Hours: 63 hours [38 hours for mail-in + 25 hours through interviews = 63 hours].

Estimated Annual Number of Respondents: 50 representatives [50 e-mail surveys to include up to 50 follow-up interviews of respondents with concerns and/or recommendations for improvements].

Estimated Annual Number of Responses: 100 responses [50 electronic mail-in responses + 50 additional follow-up interviews with State personnel].

The U.S. Department of Labor, Bureau of Labor Statistics website provides the following mean hourly wages for three different classes of public servants.

<u>Occupation Series and Title</u>	<u>Mean Hourly Wage</u>
<p><i>33-1012 First-Line Supervisors of Police and Detectives (State Government Protective Services) Directly supervise and coordinate activities of members of police force. This information can be found at:</i> http://www.bls.gov/oes/current/oes331012.htm</p> <p><i>53-6051 Transportation Inspectors</i> <i>Inspect equipment or goods in connection with the safe transport of cargo or people. Includes rail transportation inspectors, such as freight inspectors; rail inspectors; and other inspectors of transportation vehicles, not elsewhere classified. Excludes "Transportation Security Screeners" (33-9093).</i> http://www.bls.gov/oes/current/oes536051.htm</p>	\$39.76
	\$32.83
AVERAGE	\$36.29

The average hourly rate a supervisory public servant is \$36.29/hr. Using this rate, the estimated total annual cost to respondents for completing the surveys is \$2,286 [63 annual burden hours x \$36.29 respondents cost per hour = \$2,286.27]

13. Estimates of total annual costs to respondents.

No cost beyond those reported under bullet number 12 above.

14. Estimate of cost to the Federal government.

The total Federal government budget for this information collection is \$26,000, based on an average grade of GS-14, step five. The costs are itemized as follows:

Assume average grade is GS14/5
Tasks
Project Management costs
Development of survey design and protocol

15. Explanation of program changes or adjustments.

This program change increase of 63 estimated annual burden hours is due to a new ICR.

16. Publication of results of data collection.

FMCSA will analyze the results of the surveys they receive and report the results to the public on FMCSA Web site at www.fmcsa.dot.gov as appropriate.

17. Approval for not displaying the expiration date of OMB Approval.

FMCSA is not seeking an exemption from displaying the expiration date on the information collection questionnaires.

18. Exceptions to certification statement.

None.