

DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION
JUSTIFICATION STATEMENT

**49 U.S.C SECTION 5320 PAUL S. SARBANES
TRANSIT IN PARKS PROGRAM
OMB# 2132 - 0574**

ABSTRACT

This supporting statement is associated with a request for revision of a currently approved information collection. The change in this collection reflects a reduction in burden on the public and federal government due to the 49 U.S.C. Section 5320 Paul S. Sarbanes Transit in the Parks Program being repealed by Congress under the Moving Ahead for Progress in the 21st Century Act (MAP-21).

1. Circumstances that make collection necessary.

The Paul S. Sarbanes Transit in Parks Program was necessary because it addressed the challenge of increasing vehicle congestion in and around our national parks and other federal lands. America's national parks, wildlife refuges, and national forests were created to protect unique environmental and cultural treasures, but are now facing traffic, pollution and crowding that diminishes the visitor experience and threatens the environment. To address these concerns, this program provided funding for the planning and capital costs of alternative transportation systems, such as shuttle buses, rail connections and even bicycle trails. The program provided grants to Federal land management agencies, including but not limited to the National Park Service, the Fish and Wildlife Service, the Bureau of Land Management, the Forest Service, the Bureau of Reclamation, and to State, tribal and local governments.

The Paul S. Sarbanes Transit in Parks Program (Transit in Parks) was originally authorized in 2006 under Section 3021 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act—A Legacy for Users of 2005 (SAFETEA-LU) and codified in 49 U.S.C. 5320. The program is administered by the Federal Transit Administration (FTA) in partnership with the Department of the Interior (DOI) and the U.S. Department of Agriculture's Forest Service. In accordance with a Memorandum of Agreement between DOT and DOI, FTA staff worked closely with representatives of the Federal land management agencies to select the most meritorious projects – those that were both strong transportation projects and that best meet the unique needs of Federal lands. The evaluation criteria were based on (1) demonstration of need, (2) visitor mobility and experience benefits, (3) environmental benefits, and (4) operational efficiency and financial sustainability. As of January 2, 2015, the Transit in Parks Program has awarded more than \$163 million to Federal Land Management Agencies and State, tribal and local governments.

On October 1, 2013, the Paul S. Sarbanes Transit in Parks Program was repealed by Congress under the Moving Ahead for Progress in the 21st Century Act (MAP-21). Originally, the program had two application reporting requirements; 1.) the competitive grant application stage and 2.) grant application development stage. As a result of the program being repealed, the competitive grant application stage was eliminated, dramatically reducing the number of respondents previously associated with the collection. However, information must continue to be collected under the grant application development stage. During this phase, grantees apply for funds that were previously allocated during the competitive stage. In addition, as a result of Federal program oversight responsibilities, FTA must also continue to collect information under the program management stage until the period of availability expires; the funds are fully expended; the funds are rescinded by Congress; or the funds are otherwise reallocated.

Grant Application Development Stage

As a result of MAP 21, the Paul S. Sarbanes Transit in Parks Program (Section 5320) has been repealed. While there will be no additional funds distributed through the Section 5320 program, approximately \$12 million dollars in remaining FY 2012 funds were awarded in 2013. Therefore, grantees previously awarded funding have the ability to apply for these remaining funds. The information collected during this stage is comprehensive and includes a.) recipient information; b.) project information; c.) budget information; and d.) substantial narrative report(s). Applicants submit the information electronically via FTA's Transportation Electronic Award and Management (TEAM) system. It takes grantees approximately (10) hours to collect, verify and submit the needed grant application information. A sample screenshot of the (16 page) grant application information is included in this information collection request (ICR).

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. These requirements apply to State, local and tribal entities receiving grants through this program. These reporting requirements are:

- a. Quarterly Federal Financial Reports (FFRs). These quantitative reports 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.
- b. Quarterly Milestone & Progress Reports (MPRs). These reports permit FTA staff to monitor the progress of the project in view of the proposed milestones. The information in this report defines the level of activity for each project element during the reporting period. Delays, problems, and milestone achievements are included. The report allows recipients the ability to highlight any changes to the proposed milestones, any unanticipated changes to the project schedule, and to highlight the impact of the transportation project on the recipient's visitor management goals. The MPR reports greatly reduce the need for on-site visits by staff.

It is estimated that it takes approximately 2 hours to submit each quarterly report. A screenshot of a sample FFR and MPR are included in this information collection request (ICR).

2. How, by whom, and for what purpose the information is to be used.

The information collected during the Grant Application Development Stage is necessary in order for eligible recipients to be awarded funds. Grantees must apply thru FTA's online Transportation Electronic Award and Management (TEAM).

FTA collects information during the Project Management Stage from recipients that are currently managing an active or incomplete project. The narrative information is submitted through TEAM. The purpose of the collection of this information is to monitor the implementation of the project. Projects must be monitored to ensure that the work remains within the scope of the competitively selected award, that acceptable progress is being made towards completion in a reasonable timeframe, and that reimbursement requests and the drawdown of funds is in line with the proposed project milestones.

3. Describe whether collection of information involves information technology and any consideration of using information technology to reduce the burden.

FTA's TEAM system electronically assists State, local and tribal grantees with reporting requirements for federal funds. 100% of the grant recipients utilize the TEAM system to submit this information. This program is designed to aid FTA grant applicants by reducing paper and time.

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 application and reports are project-specific and cannot be obtained from other sources.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The information collected does not involve small businesses.

6. Describe consequences to federal program or policy activities if the information were not collected or collected less frequently, as well as any technical or legal obstacles to reducing burden.

If the FFR information was not collected during the project management stage, FTA would

not be able to track expenditures for approved projects as federally required. Further reduction of reporting information would make it impossible to examine projects to ensure that grant recipients are successful stewards of federal funds and have financial systems in place to monitor their grant expenditures. Timely submission of MPRs ensures projects remain within the scope of the competitively selected award, that acceptable progress is being made towards completion in a reasonable timeframe, and that reimbursement requests and the drawdown of funds is in line with the proposed project milestones.

7. Explain any special circumstances that would cause information 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. Describe efforts to consult with persons outside the agency to obtain their views.

A 60-day Federal Register notice was published on December 29, 2014, Vol. 79, No. 248 (pages 78138 and 78139) soliciting comments prior to submission to the Office of Management and Budget (OMB). No comments were received from that notice. A 30-day Federal Register notice was published on March 17, 2015 Vol. 80, No. 51 (page 13948 and 13949). However, that notice contained an incorrect estimated total annual burden hour (370 hours) on respondents. On March 27, 2015 a Notice of Correction was published in the Federal Register Notice Vol. 80 No. 59 (page 16512). It corrected the total annual burden as 130 hours.

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

No payment or gift is made to respondents.

10. Describe any assurance of confidentiality provided respondents.

There is no assurance of confidentiality regarding submissions.

11. Additional justification for any questions of a sensitive nature.

None of the information is of a sensitive nature.

12. Estimate of the hour burden of the collection of information and annualized cost to respondents.

a. Estimate of the burden of the collection of information:

Requirements	Annual Submissions	Burden Hours per Submission	Total Burden Hours
Application Stage			
Grant Development	5	10	50
Project Budget	5	incl.	incl.
Authorizing Resolution	incl.	incl.	incl.
Opinion of Counsel	incl.	incl.	incl.
List of Labor Unions	incl.	incl.	incl.
Annual Certifications and Assurances	incl.	incl.	incl.
Subtotal		10	50
Project Management Stage			
Quarterly Federal Financial Report	20	2	40
Quarterly Progress & Milestone Report (Narrative)	20	2	40
Subtotal		4	80
Grand Total			130

The total number of burden hours associated with this submission in FTA’s information collection inventory is **130 hours** (50 hours for the application stage + 80 hours for the project management stage).

b. Estimate of the cost to respondents.

Requirements	Annual Burden Hours	Average Salary /Hour	Total Annual Cost to Respondent
Application Stage			
Grant Development	50	\$32	\$1600
Project Budget	incl.	incl.	incl.
Authorizing Resolution	incl.	incl.	incl.
Opinion of Counsel	incl.	incl.	incl.
List of Labor Unions	incl.	incl.	incl.
Annual Certifications and Assurances	incl.	incl.	incl.
			\$1600
Project Management Stage			
Quarterly Federal Financial Report	40	\$32	\$1280
Quarterly Progress & Milestone Report (Narrative)	40	\$32	\$1280
			\$2560
TOTAL			\$4,160

The total cost to respondents is **\$4,160** (\$1600 Application Stage + \$2560 Project Management Stage).

13. Estimate of total annual cost burden to respondents or record keepers resulting from the collection of information (not including the cost of any hour burden shown in Items 12 and 14).

The information requested is collected and reviewed in the course of normal business practices; therefore, no additional costs are associated beyond that shown in item 12.

14. Estimates of the annualized cost to the federal government.

Requirements	Annual Personnel Hours	Average Salary/Hour	Total Annual Cost to the Federal Government
Application Stage			
Grant Development	20	\$42	\$840
Project Budget	incl.	incl.	incl.
Authorizing Resolution	incl.	incl.	incl.
Opinion of Counsel	incl.	incl.	incl.
List of Labor Unions	incl.	incl.	incl.
Annual Certifications and Assurances	incl.	incl.	incl.
			\$840
Project Management Stage			
Quarterly Federal Financial Report	40	\$42	\$1680
Quarterly Progress & Milestone Report (Narrative)	40	\$42	\$1680
			\$3360
TOTAL			\$4,200

It is estimated that the annual cost to the federal government is \$4,200.

15. Explain reasons for changes in burden, including the need for any increases.

The burden associated with the grant application stage and program management stage has been significantly reduced as a result of the program being repealed under MAP-21, eliminating funding for the program since 2013. As a result, the reporting of information is limited to those grantees associated with previous allocations of funding, which has been reduced to approximately five active grants.

16. Plans for tabulation and publication for collections of information whose results will be published.

FTA does not plan to publish the results of the information collected for statistical use.

17. If seeking approval not to display the expiration date of OMB approval, explain the reasons.

FTA is not seeking approval not to display the expiration date of OMB approval.

18. Explain any exceptions to the certification statement identified in item 19 of Form 83-I.

No exceptions are stated.