

DEPARTMENT OF TRANSPORTATION

FEDERAL TRANSIT ADMINISTRATION

JUSTIFICATION STATEMENT

JOB ACCESS AND REVERSE COMMUTE (JARC) PROGRAM  
(OMB # 2132-0563)

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reduction in burden on the public and federal government due to the Job Access and Reverse Commute (JARC) Program being repealed by Congress under the Moving Ahead for Progress in the 21<sup>st</sup> Century Act (MAP-21).

A. Justification

1. CIRCUMSTANCES THAT MAKE THE COLLECTION NECESSARY.

The Federal Transit Administration (FTA) provides financial assistance to States, local governments, private nonprofit organizations and public transportation authorities through 49 U.S.C. Section 5316, the Job Access and Reverse Commute (JARC) Program. The program provided funding to states for areas with a population of less than 200,000 and designated recipients in urbanized areas of 200,000 persons or greater to transport welfare recipients and other low-income individuals to and from jobs related to employment. The (JARC) program was established to address the unique transportation challenges faced by welfare recipients and low-income persons seeking to obtain and maintain employment.

The provisions of Title 49 U.S.C. Section 5316, 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.

On October 1, 2013, the Job Access and Reverse Commute (JARC) Program was repealed by Congress under the Moving Ahead for Progress in the 21<sup>st</sup> Century Act (MAP-21). Originally, the program had two reporting requirements by grant recipients; the application stage and the project management stage. Since being repealed, the program no longer announces grant funding opportunities, thus totally eliminating the application stage. However, to meet federal program oversight responsibilities for those JARC grants that are still active, FTA must 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.

## 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 5010.1B, and may also be included in sections of the grant contract. These reporting requirements are:

### Milestone/Progress Reports (MPRs) – SUBMITTED ANNUALLY

These narrative reports define the level of activity for each project element during the reporting period. All significant events (e.g. delays, problems, milestone achievements, etc.) are reported in the MPR. The reports greatly reduce the need for on-site visits by staff.

### Financial Status Reports (FFRs) – SUBMITTED QUARTERLY

These qualitative 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. In addition, any 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 this report.

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

The eligible designated grant recipients of the JARC program included States and public bodies. Eligible sub-recipients were private non-profit organizations, State or local governments, and operators of public transportation services including private operators of public transportation services. The recipients submit annual reports via FTA's Transportation Electronic Award and Management (TEAM) data collection system. The information submitted ensures FTA's compliance with applicable federal laws and the Common Grant Rule. Without these reports, significant resources and manpower would be necessary to conduct on-site inspections. In addition, the FFR report permits an assessment of program effectiveness for the federal government in both the executive and congressional branches. If this information was not collected, FTA could not ensure the proper expenditure of federal funds or assess the program effectiveness.

This information collection also satisfies the mobility 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 (TEAM) is a paperless, electronic grant application, review, approval, acceptance and management process. All JARC grants and periodic reports are submitted (100%) 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.

A 60-day Federal Register notice was published on March 17, 2015 Vol. 80, No.51 (page 13949-13950) soliciting comments prior to submission to the Office of Management and Budget (OMB). No comments were received. A 30-day Federal Register notice was published on June 1, 2015 Vol. 80 No. 104 (page 31092).

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.

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

**Estimated Annual Number of Respondents: 181**

**Estimated Annual Number of Responses: 2170** (434+1736)

**Estimated Total Annual Burden Hours: 52, 080** (17,360+34,720)

**Estimated Total Cost: \$1,562,400** (\$520,800 + 1,041,600)

The estimated annual burden hours and cost of the (JARC) Program during the Project Management stage is presented below. The estimate is based on the actions required by grantees for their open grants. Each grant has required reports that are submitted into TEAM by the grant recipient. FTA estimates that only (1) lawyer, accountant, mechanical engineer, and/or admin grantee personnel will be involved in the preparation of the request. Although there is no new funding available for this program, there are currently a total of (181) respondents with 434 open grants that they are required to continue reporting information under the project management stage. There are some respondents that have more than one grant in the system.

All (181) respondents must submit an FFR on a quarterly basis for each open grant (434 x 4 =1736 FFR annual reports). (181) respondents must submit a MPR for each open grant on an annual basis (434 x 1 = 434 MPR annual reports). Therefore, there are a total of 2170 reports on an annual basis. Please note, that although the number of respondents, annual burden hours and the cost decreased in this ICR submission, there is an increase in the annual responses. Previous information collection submissions assumed that the number of respondents was equal to the number of grants that would have reporting requirements. Upon review and updating of the current information collection, it was found that FTA had more grants per respondent than just one.

If compiling each FFR takes 10 hours each, four times a year, the annual FFR burden hours is 17,360 (1736 x 10). If compiling each MPR takes 80 hours once a year, the total burden hours per year for MPR's is 34,720 (434 x 80). The total annual burden hours for completing both the required FFR and MPR reports is 52,080 hours.

<b>Report Requirements</b>	<b># Total Open Grants</b>	<b>#Total Submissions/ Reports Annually</b>	<b>Burden hours per submission</b>	<b>Total Submissions/ Reports Annual Burden Hours</b>
Federal Financial Reports (FFR) Submitted Quarterly	434	1736	10	17,360
Milestones/ Progress Reports (MPR) Submitted Annually 16,696	434	434	80	34,720
Totals	434	2170	N/A	52,080

Estimate of the cost to respondents:

Project Management Stage:

It is estimated to take each respondent approximately 10 hours per report to prepare and submit the quarterly FFRs. It is estimated that (1) individual will prepare each report at \$30 per hour for a cost of \$300 per grant. The total annual cost for preparing and reporting the FFR reports is \$520,800 (300 x 1736).

It is estimated to take each respondent approximately 80 hours to prepare and submit (1) MPR on annual basis for each grant. It is estimated that (1) individual will prepare each MPR report at \$30 per hour for a total cost of \$2,400 per grant (80 x 30 = 2400). The total cost to the respondents to prepare and submit MPR's on annual basis is \$1,041,600 or (2400 x 434).

The total annual burden cost to the respondents for preparing and submitting both the FFR and the MPR reports is \$1,562,400 (520,800 + 1,041,600).

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 1 hour to review each report. There are approximately 434 projects requiring review annually. The cost to the federal government is \$ 18,228. (1 hr. x 434 submissions = 434 hours x \$42 = \$ 18,228.). FFR's are reviewed quarterly to ensure they are submitted and that they are accurate which takes approximately ½ hour for a GS-13 (average salary, \$ 42 per hour). The cost to the federal government is \$ 9114 (1/2 x 434 submissions = 217 hours x \$ 42 = \$ 9114). Thus, the total cost to the government for the project management stage is: \$ 27,342 (\$18,228+\$9114).

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

The burden decreases from 153,988 hours in the previous request to 52,080 hours for this request, representing a decrease of 101,908 hours. The decrease is due to a legislative change that eliminated the program effective October 1, 2012. All funds authorized under the previous law for this program are obligated – a total of \$ \$706,652,284 with 434 grants still active. No additional applications will be required thus there is only one phase still pertinent to this program – the program management phase. These changes reduced the burden hours and the number of active grants.

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 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.