

DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION

SUPPORTING STATEMENT

Transit Research, Development, Demonstration, and Deployment Projects
(OMB Control No. 2132-0546)

ABSTRACT

This supporting statement is associated with a request for revision of a currently approved information collection. The change in this collection reflects an increase in the annual burden hours due to the 49 U.S.C. Section(s) 5313, 5314, and 5322 being added to the program under the Moving Ahead for Progress in the 21st Century Act (MAP-21).

1. Circumstances that make the collection necessary.

The Federal Transit Administration's Research, Development, Demonstration, Deployment, Cooperative Research, Technical Assistance, Standards Development, and Human Resources and Training programs are authorized at 49 U.S.C. 5312, 5313, 5314, and 5322 and collectively seek to develop solutions that improve public transportation. Its primary goals are to increase transit ridership, improve safety and emergency preparedness, improve operating efficiencies, protect the environment, promote energy independence, and provide transit research leadership; develop and conduct workforce development activities, training and educational programs for Federal, State, and local transportation employees, United States citizens, and foreign nationals engaged or to be engaged in Government-aid relating to public transportation work; and to sponsor development of voluntary and consensus-based standards to more effectively and efficiently provide transit service, as well as support the improved administration of Federal transit funds. To accomplish this, FTA funds projects to support research and development, demonstration, deployments of various technologies and operational models for transit; a national cooperative research program, a national training institute, national technical assistance centers, and transit workforce development programs.

The Research, Development, Demonstration, and Deployment Projects program (49 U.S.C. 5312) supports research not generally undertaken by the private sector. This includes studies on transit policy issues, operational efficiency, and travel behavior. These projects will promote the use of clean energy and air quality improvement. The program also funds long-term, high-risk, high-potential payoff investigations of new technologies, which is critical to developing a public transportation system that is efficient, attractive, and reliable. The majority of the funds (75%) appropriated under 49 U.S.C 5338 to support this section, must be used for a discretionary Low and No Emission deployment program.

The Transit Cooperative Research Program (TCRP) (49.U.S.C 5313) funds shorter-term research projects that address immediate operational issues facing the transit industry. These projects are designed to identify immediate improvements in transit safety, equipment and system design, system operations, and the economic development impact of transit

investments, among other topic areas. These funds are awarded to the National Academies of Science.

The Technical Assistance and Standards (49 U.S.C. 5314) funds support provide resources and direct assistance to support compliance with the Americans with Disabilities Act (ADA), human services transportation coordination requirements, the transportation needs of elderly individuals, increased transit ridership, transportation equity needs, and any other technical assistance activities deemed necessary by FTA, such as improvements in safety and asset management.

The Human Resources and Training program (49. U.S.C 5322) creates Ladders of Opportunity to help build pathways for job-seekers by leveraging opportunities in the transit industry in manufacturing, operations and maintenance. This program, among other activities, awards grants to transit agencies and other entities for workforce development programs and projects.

The information requested is necessary to evaluate applications and select projects associated with these U.S.C. 49 Sections for funding, ensure applicants meet eligibility requirements, make project awards, monitor grant requirements, disburse federal funds, evaluate project progress and results and determine the most effective means of sharing those results with a variety of customers in the public and private sectors.

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

Consistent with OMB Circular A-102, Grants and Cooperative Agreements with State and Local Governments, or 2 CFR 215 Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations, all applicants for FTA research grants must complete the information requested in the Standard Form 424 as well as complete a statement of work describing the work to be carried out for the proposed project to apply for funding for a project. FTA places Notices of Funding Availability (NOFA) on grants.gov describing what types of research activities FTA is proposing to fund and announcing selection criteria under each announcement that needs to be addressed in the statement of work. FTA uses this information to evaluate and select the projects for funding that best support FTA's strategic goals and priorities that offer the best technical and management approach, and are consistent with the specific objectives set forth in the NOFA. This information is also required to ensure applicants and the projects meet eligibility requirements and are in compliance with federal regulations.

Once a project has been selected and awarded, information is needed to ensure that the projects are being properly implemented, are achieving intended results on a timely basis, remain within approved budgets, and yield technical information of value to the federal government, the transit community and academia. Consistent with OMB Circular A-102, Grants and Cooperative Agreements with State and Local Governments, or 2 CFR 215 Uniform Administrative Requirements for Grants and Agreements with Institutions of

Higher Education, Hospitals, and Other Non-Profit Organizations, recipients must submit quarterly progress reports, the Federal Financial Report, the SF-270 to request payment, as well as a final technical report summarizing the research results of the project. FTA project managers use this information to ensure the technical and financial aspects of the project are proceeding in accordance with the grant requirements. The final technical report is used to share the results of the research with the transit industry.

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

All grantees (100%) submit information requested under the Standard Form 424 as well as the proposed statement of work, quarterly progress reports and the Federal Financial Report electronically into FTA's electronic grant-making and management system known as TrAMS. That system relies upon electronic signatures, with personal identification numbers. Grantees prepare and submit all technical and financial reports online in electronic form. FTA receives technical reports in electronic form to facilitate their posting and dissemination on the FTA website (www.fta.dot.gov). It is possible for a recipient to supply current information by updating prior versions of an electronic file and there is no technical or legal obstacle to this method.

On April 4, 2015, FTA issued a new version of Circular 6100.E Research, Technical Assistance and Training Program: Application Instructions and Program Management Guidelines. This circular, which was last updated in 2011, reflects current FTA practices and new information technology. This circular notes a requirement for all applicants to use a streamlined electronic system for application and project management, as well as clarify internal requirements and processes. Finally, it makes applicants aware of standard registration and reporting requirements, such as Data Universal Numbering System (DUNS), Central Contractor Registration (CCR), Grants.gov, and the Federal Funding Accountability Transparency Act (FFATA). These are all centralized electronic reporting systems that will ensure that applicants for FTA funds who are seeking other federal funds do not experience duplicative burdens.

4. Describe efforts to identify duplication. Show specifically why similar information already available cannot be used or modified for use for the purposes described in Item 2.

FTA's transit research, development, demonstration, deployment, training, workforce, standards, and evaluation projects are very specific and unlikely to be funded by any other sponsor, federal or otherwise, minimizing the likelihood of duplication. If recipients submit information to one FTA office, copies of that information generally suffice for purposes of other FTA offices. The information need not be regenerated or resubmitted.

The information requested is unique to each individual project, and information supplied for other projects or other purposes would not be relevant or pertinent. FTA staff is responsive to suggestions that available information, instead of newly generated information, be used for project administration purposes.

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

Small businesses or other small entities may keep their project applications and reports as brief as they deem fit, as long as they respond to the requirements set forth in the project work statement, sufficiently document their accomplishment of required tasks, and provide all of the legally required certifications and assurances.

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.

The information requested is consistent with requirements set forth under OMB Circular A-102, Grants and Cooperative Agreements with State and Local Governments, or 2 CFR 215 Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations. It would be unreasonably risky for FTA to award projects without verifying the eligibility of projects and recipients for specific program funds. Information must be responsive to the individual project, and is collected only in connection with applications for or reports about each project. If not collected, FTA could not make the necessary determinations that projects and/or recipients are eligible for funds, would be ignorant of whether or not progress was being made in conducting the projects, and would not have access to the information resulting from the projects even though it is produced with taxpayer funds.

Any delay or curtailment in reporting frequencies would greatly hamper the ability of FTA's program managers to monitor project activities effectively. Experience has shown that noncompliance with progress reporting requirements results in loss of pertinent information by grantees and jeopardizes their ability to document and certify how funding was utilized.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with 5 CFR 1320.6.

The collection is consistent with 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 21, 2015 Vol. 80, No. 244 (pages 79418 and 79419), soliciting comments prior for the approval of this information collection to submission to the Office of Management and Budget (OMB). No comments were received. The 30-day Federal Register notice was published on February 26, 2016 Vol. 81, No.38 (page 9932 and 9933).

On August 13, 2014, FTA issued a notice of availability of proposed FTA Circular 6100.1E in the Federal Register (78 FR 47514) and requested public comment. The comment period closed on October 14, 2014. The FTA Circular 6100.1E was a revision and update to Circular 6100.1D, which was last updated in 2011. In addition to the MAP-21 revisions addressed in the circular, this circular updates the organization and wording of the previous circular to improve clarity and consistency with FTA's other circulars and to reflect other changes in the law. Notably, the Office of Management and Budget (OMB) released its final guidance, "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards," 2 CFR part 200, on December 26, 2013. The U.S. Department of Transportation (U.S. DOT) is implementing the new OMB requirements through a new Common Rule, U.S. DOT regulations, "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards," 2 CFR part 1201. These U.S. DOT regulations (Common Rule) supersede and apply in lieu of U.S. DOT's previous Common Rules, former 49 CFR parts 18 and 19, and the Federal Cost Principles Circulars, former 2 CFR parts 220, 225, and 230. The requirements of former 49 CFR parts 18 and 19, and the Federal Cost Principles Circulars, former 2 CFR parts 220, 225, and 230, apply to FTA Grants and Cooperative Agreements and Amendments thereto awarded before December 26, 2014, to the extent applicable. The requirements of the new U.S. DOT regulations at 2 CFR part 1201 apply to FTA Grants and Cooperative Agreements and Amendments awarded on or after December 26, 2014 to any FTA Grants and Cooperative Agreements to the extent applicable. The Federal Transit Administration issued the final circular on April 10, 2015 [Docket No. FTA-2014-0017] Research, Technical Assistance, and Training Programs: Application Instructions and Program Management Guidelines.

Additionally, with the passage of the Fixing America's Surface Transportation Act on December 1, 2015, FTA will be reviewing and updating the FTA Circular 6100.1E to reflect any substantive changes needed.

Agency staff meets frequently with constituents groups to discuss projects, programs and priorities. There have been no complaints regarding burdensome application procedures or too frequent progress and financial reporting.

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

No payment or gift is made to respondents, all of whom are the actual or prospective contractors and grantees, beyond reimbursement of the federal share of project costs as documented in the grant, cooperative agreement or contract.

10. Describe any assurance of confidentiality provided respondents.

Applications are reviewed by project managers. In rare cases, unsolicited proposals from private companies are also reviewed by the Office of Procurement. Any proprietary information contained in applications or proposals is protected during the project application review, award and administration processes. Once an award is made, information generated by the project is in the public domain unless exceptional arrangements have been negotiated for intellectual property involved in the project.

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

No sensitive information is required.

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

Estimated Total Annual Number of Respondents: 175

Estimated Total Annual Burden Hours: 20,550

Estimated Total Cost: \$678, 150

Requirement	Number of Respondents	Frequency of Response (annual submissions)	Burden per Submission (labor-hours)	Annual Hour Burden (labor-hours)
<u>Application Stage</u>	175	1	90	15,750
Authorizing Resolution				
Opinion of Counsel				
Standard Assurances				
Project Description				
Project Budget				
Project Justification				
<u>Project Management Stage</u>				
Quarterly Progress Report	150	4	6	3,600
Financial Status Report	150	4	2	1,200
Total Annual Hour Burden				20,550
Estimated hourly cost of preparing information collected				\$33 per hour
Estimated annualized cost to respondents for hour burdens				\$678,150

The figures below represent an application meeting all of the criteria for funding under 49 U.S.C. Section 5312, 5314, 5338 and 5322. It is estimated that it takes 90 labor-hours to develop and submit an application to FTA for review. These are often scientific and technical applications which require subject matter expertise.

FTA receives approximately 175 applications per year, mostly for demonstration and deployment pilot projects. These projects test out research findings in public transportation environments. Since the average hourly salary of those engaged in preparation of such application is estimated to be \$33/hour – based upon staff with an average yearly salary of \$ 68,640, cost to respondents is calculated as follows:

$$90 \text{ labor hours} \times 175 \text{ applications} = 15,750 \text{ hours} \times \$33 = \$519,750$$

The total cost per application is $\$519,750/175 = \$2,970$.

For project management activities, the following estimates are provided.

Quarterly Progress Reports: Staff time for preparation of these progress reports is estimated at 6 hours at \$ 33/hr. for an average cost of \$198 per report. There are 600 reports submitted annually (600 reports x 6 hours = 3,600 hours) and the cost is estimated at \$118,800 (600 reports x \$198).

Financial Status Report: Estimated staff time spent to prepare Financial Status Reports is 2 hours or \$66 per report. There are 600 such reports submitted annually (600 reports x 2 hours = 1,200) and the cost is estimated at of \$39,600 (600 reports x \$66).

The total annual cost to a typical project recipient for project management is \$158,400, or an average of about \$1,056 per project per year.

The grand total annual cost to the applicants and grantees is estimated at \$678,150 (\$519,750 + \$158,400).

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 collected and reviewed is required in the course of normal business and there is no additional cost beyond that shown in Items 12 and 14.

14. Estimates of annualized cost to the federal government.

Experience indicates that it takes approximately 4 labor-hours to review typical project applications or proposals. This assumes that the application is complete, noncontroversial, and fundable. Although aspects of each application may be reviewed by many different members of the FTA staff, from secretaries to the Administrator, it is estimated that the average level is GS-13/5, or \$50.04 (2016 GS pay rate with 24.78% locality adjustment for the Washington, D.C. area) per hour, or 4 labor-hours x \$50.02 per hour = \$200.16 per application. Since FTA receives approximately 175 applications each year, the cost to the federal government is 175 applications x \$200.16 per application = \$35,028.

Based on recent experience, FTA awards approximately 75 new projects per year. The transit research, training, technical assistance, workforce, and standards programs cover virtually all areas of public transportation research and the federal government is the overwhelming source of funding for research in transit due to the publicly subsidized nature of the transit industry. It is extremely difficult, if not impossible, to reduce the number of projects, as each project is completely unique and addresses a different area of critical need. In addition, transformative technologies are creating fundamental changes to public transportation operations and capital, thus necessitating more opportunities to test out new processes and products. The cost to the federal government to manage new and previously approved projects is estimated as follows:

Application Review: Receive and review approximately 175 applications each year, the cost to the federal government is 175 applications x \$200.16 per application = \$35,028.

Quarterly Progress Reports: Review of a typical progress report should be completed within an hour by a GS-13/5. There are about 150 active projects requiring 4 reports per year; therefore, 600 x 4 x \$50.04 = \$30,024 annually.

Financial Status Reports: Review of a typical Financial Status Report takes less than 1/2 hour by a GS-13/5 with an hourly wage of \$50.04. Since there are approximately 150 projects requiring four reports per year, the cost is 600 x 4 x 0.5 x \$50.04 = \$15,012 annually.

Vouchers and Requests for Payment: Review of a typical voucher or request for payment requires about one hour of work collectively by an accounting technicians, administrative assistant and program manager. Assuming a composite average grade of GS-11/5, at an hourly rate of \$35.11, and assuming monthly disbursements, the cost is 150 x 12 x \$35.11 = \$63,198 annually.

In summary, the total annual cost to the federal government for reviewing these reports, requests for funds and applications is \$143,442 (\$35,208 + \$30,024+ \$15,012 + \$63,198).

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of OMB Form 83-I.

There is an increase in the burden hours requested under the current information collection request from 11,240 hours previously approved to the newly requested burden hours of 20,550 due to the addition of new programs being added to FTA's Transit Research, Development, Demonstration, and Deployment Projects as authorized under MAP-21 and the increase in technical complexity of research projects. In addition, the number of respondents was reduced from 200 to 175 due to more accurate information generated from respondents during recent funding availability.

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

Individual research results reported are published, typically in the form of individual project reports that are made available for public dissemination on the FTA website. Additionally, FTA publishes and posts on the FTA website an annual report on research.

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 exception to the certification statement identified in Item 19 of OMB Form 83-I.

No exceptions are stated.