

DEPARTMENT OF TRANSPORTATION

Federal Transit Administration

JUSTIFICATION STATEMENT

Transit Investments in Greenhouse Gas and Energy Reduction Program
OMB Control No. 2132-0566

ABSTRACT

This supporting statement is associated with a request for revision of a currently approved information collection. The change in this collection reflects a decrease in the annual burden hours and respondents due to the elimination of funding for the program. This program was funded for three years (2009-2011) under the American Recovery & Reinvestment Act (ARRA) of 2009. However, to meet federal program oversight responsibilities for the remaining TIGGER 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the program management stage until the period of availability expires; the funds are fully expended; the funds are rescinded by Congress; or the funds are otherwise reallocated.

1. CIRCUMSTANCES THAT MAKE THE COLLECTION NECESSARY.

The Federal Transit Administration (FTA) provided financial assistance to public transportation authorities through the Transit Investments in Greenhouse Gas and Energy Reduction (TIGGER) Program. Initiated within the American Recovery and Reinvestment Act (ARRA) of 2009, the TIGGER Program concluded the funding opportunities with the announcement of project selections in (FY) 2011. The TIGGER program provided funding to public transportation agencies to implement new strategies for reducing greenhouse gas emissions and/or reduce energy use within transit operations. The TIGGER program awarded 87 competitively selected projects, implementing a wide variety of technologies to meet program goals. The awarded projects were geographically diverse, covering 35 states and 67 different transit agencies in both urban and rural settings.

Since the last Notice of Funding Availability (NOFA) in December 2011, the program no longer announces grant funding opportunities, thus totally eliminating the application stage. However, reporting requirements must be submitted by recipients in two stages: the project management stage and the project evaluation stage.

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 5010.1D, "Grant Management Requirements" and may also be included in sections of the grant contract. These reporting requirements are:

- a. Milestone/Progress Reports (MPR). These narrative reports are required quarterly. They define problems, and milestone achievements are reported to FTA. The reports greatly reduce the need for on-site visits by staff. In addition, any grant recipients that received funding under ARRA through were required to submit an additional report on progress implementing their grants, pursuant to the requirements of Section 1201(c) of the Recovery Act. This report was completed as part of the Milestone Progress Reports. The final report of all DOT ARRA Programs was published in 2012 and can be found at <https://www.transportation.gov/policy-initiatives/recovery/arra-1201c-report-january-31-2012>.
- b. Federal Financial Status Reports (FFRs). These quantitative reports are required quarterly. They 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.
- c. Cost Allocation Plan Report (CAP). These reports are required annually and are tailored to fit the specific policies of each grantee. The reports summarize, in writing, the methods and procedures that each grantee uses to allocate costs to the various projects, contracts and agreements (direct and indirect expenses).

Project Evaluation Stage

The reporting requirement under this stage is necessary to assess program effectiveness for the federal government in both the Executive and Congressional branches. This electronic database report is collected annually from grantees and provides information regarding how the project is performing in achieving national program objectives. Information is provided regarding actual energy use and greenhouse gas emission reductions and associated reductions in operating costs. This information permits federal Executive and Congressional evaluation of the program.

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

The reports are submitted annually through FTA's Electronic Management and Award system (TrAMS). The information submitted ensures FTA's compliance with applicable federal laws and the Common Grant Rule. In addition, without these reports, significant resources and manpower would be necessary to conduct on-site inspections. Finally, the evaluation report permits an assessment of program effectiveness for the federal government in both the executive and congressional branches.

This information collection also satisfies the environmental stewardship 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 is a paperless, electronic grant application, review, approval, acceptance and management process. All TIGGER grants and periodic reports are submitted 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.

FTA has worked with grantees on reporting requirements in shaping its reporting system and offers an opportunity for all grantees to comment on its methodologies. A 60-day Federal Register notice was published on August 16, 2016 Vol. 81. No. 158 (page 54660), soliciting comments prior to submission to OMB. A 30-day Federal Register notice was published on November 17, 2016 Vol. 81 No. 222 (pages 81239 & 81240).

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. Congress through the Government Accountability Office has required an evaluation of this program every six months and a formal written report annually.

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

Estimated Annual Number of Respondents: 24

Estimated Total Annual Burden Hours: 3,072

Estimated Total Cost: \$92,160

The estimated annual burden hours and cost of the TIGGER Program during the Project Management stage is presented below. The estimate is based on the actions required by current grantees for their open projects. Each grant has required reports that are submitted into TrAMS by the grant recipient. FTA estimates that only (1) 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 (24) respondents with 24 open grants that they are required to continue reporting information under the project management stage.

All 24 respondents must submit an FFR on a quarterly basis for each open grant (24 x 4 = 96 FFR annual reports). (24) Respondents must submit a MPR for each open grant on a quarterly basis (24 x 4 = 96 MPR annual reports). (24) Respondents must submit a Cost Allocation Plan for each open grant on an annual basis (24 x 1 = 24 CAP annual reports). Therefore, there are a total of 216 reports on an annual basis. Please note, the number of respondents, annual burden hours and the cost decreased in this Information Collection Request (ICR) submission decreased.

If compiling each FFR takes 4 hours each, four times a year, the annual FFR burden hours is 384 (96 x 4). If compiling each MPR takes 16 hours each, four times a year, the annual MPR burden hours is 1,536 (96 x 16). If compiling each CAP takes 8 hours once a year, the total burden hours per year for CAP is 192 (24 x 8). If compiling each Annual Evaluation Report

(AER) takes 40 hours once a year, the total burden hours per year for AER is 960 (24 x 40).

Title: TIGGER Estimated Burden and Cost

REPORT REQUIREMENTS	ANNUAL RESPONDENTS (OPEN GRANTS)	TOTAL SUBMISSIONS/REPORTS ANNUALLY	BURDEN HOURS PER SUBMISSION	ANNUAL BURDEN HOURS
PROJECT MANAGEMENT STAGE				
Federal Financial Report - FFR (quarterly)	24 (4)	96	4	384
Milestone/Progress Reports - MPR (quarterly) & Section 1201(c) ARRA Reporting	24 (4)	96	16	1,536
Cost Allocation Plan - CAP (annually)	24 (1)	24	8	192
TOTAL	24	216	28	2,112
PROJECT EVALUATION STAGE				
Annual Evaluation Report	24 (1)	24	40	960
Total Annual Burden Hours				3,072

All burden hour estimates are based on a comprehensive review of all the requirements associated with the TIGGER program and, discussions with appropriate Headquarters and Regional staff, and analysis of other FTA programs.

The annual respondents used to calculate total annual burden on the OMB Form 83-I include all the respondents who complete quarterly and annual reports. Included in this figure is the number of annual applicants who must submit quarterly and annual reports and the active grants from previous years.

Estimate of the cost to respondents:

The hourly burden to respondents is outlined in the preceding paragraphs; however, there are no additional costs to respondents other than those reflected. While FTA provides an estimate below (approximating annual cost of the burden hours), for the purposes of burden

calculation for this collection, all respondent costs are reflected in terms of burden hours. Previously approved versions of this collection erroneously counted both burden hours and monetized burden hours, overestimating the burden impact.

Project Management Stage:

It is estimated to take each respondent approximately 4 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 \$120 per grant. The total annual cost for preparing and reporting the FFR reports is \$11,520 (120 x 96).

It is estimated to take each respondent approximately 16 hours to prepare and submit the quarterly MPRs and information associated with Section 1201(c) of the Recovery Act. It is estimated that (1) individual will prepare each report at \$30 per hour for a cost of \$480 per grant (16 x \$30 = \$480). The total annual cost for preparing and reporting the MPR reports is \$46,080 (480 x 96).

It is estimated staff time devoted to the preparation and submission of CAP reports takes approximately 8 hours at an average salary of \$30 per hour or \$240 per report (8 x \$30 = \$240). There are expected to be 24 reports prepared and submitted annually. The total cost to the respondents to prepare and submit CAP on annual basis is \$5,760 or (240 x 24).

The total annual burden cost to the respondents for preparing and submitting the FFR, MPR and CAP reports is \$63,360 (11,520 + 46,080 + 5,760).

Project Evaluation Stage:

There are approximately 24 active grantees that are required to submit an annual evaluation report and we estimate that it will take approximately 40 burden hours per submission.

Therefore, the cost is estimated to be \$28,800 (24 grantees x 40 hours =960 hours. \$30 per hour x 960 hours =\$28,800.)

The grand total cost to the respondents for both the program management and evaluation stage is \$92,160 (\$63,360 + 28,800).

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 ½ hour per report to review it. There are approximately 24 projects requiring reports annually. The cost to the federal government is \$4,536 (½ hr. x 216 submissions x \$42 per hour = \$4,536).

Annual Evaluation Stage:

Grantee performance information is submitted electronically and annually to FTA through FTA's TrAMS system. This information will be summarized by FTA staff or a contractor and posted for the public. FTA estimates that one staff person at the GS-13 level will devote approximately 192 hours (8 hrs. annual evaluation x 24 reports = 192) to this task, totaling \$8,064 (192 hours x \$42 per hour = \$8,064).

The total cost to the federal government is \$12,600 (\$4,536 + \$8,064 = \$12,600).

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

The total number of burden hours decreased from 17,052 hours for the previous request to 3,072 hours for this request, representing a reduction of 13,980 hours. In addition, the total annual respondents decreased from 87 to 24, representing a reduction of 63 responses. The decrease in burden hours and respondents is due to the elimination of the application stage and a reduction of grantees required to complete the program management and reporting phase.

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 statistical use and 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.