

**DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION**

JUSTIFICATION STATEMENT

**49 U.S.C Section 5339 ALTERNATIVES ANALYSIS PROGRAM
(OMB # 2132-0571)**

Summary of Submission

This supporting statement is associated with a request for reinstatement of a previously approved information collection. FTA failed to submit the information collection request prior to the expiration date as a result of internal review processes that occurred after 2016 Presidential election. The change in this collection reflects a reduction in burden on the public and federal government due to the 49 U.S.C. Section 5339 Alternative Analysis Program being repealed by Congress under the Moving Ahead for Progress in the 21st Century Act (MAP-21). As a result, the application stage and all information collected as part of this process in the program have been eliminated.

1. Circumstances that make collection necessary.

The Alternative Analysis Grant Program was created to fund the alternative analysis portion of a project. It is the transportation planning process conducted at the local level to decide the best mode, or the best corridor, in the development of major capital investments. Under the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), it is the part of the environmental process to make decisions for the locally preferred alternatives to include how to invest capital funding and address transportation needs.

On October 1, 2013, the Alternative Analysis was repealed by Congress under the Moving Ahead for Progress in the 21st Century Act (MAP-21).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 Since being repealed, the program no longer announces grant funding opportunities, thus totally eliminating the application stage.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, 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the program management stage until the period of availability expires; the funds are fully expended; the funds are rescinded by Congress; or the funds are otherwise reallocated.

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

Since the application stage has been eliminated, the only information collected as part of the Alternative Analysis Grant Program occurs during the Project Management Stage. During this stage, grant recipients are required to submit various reports electronically via FTA's electronic award and management system (TrAMS).

Federal Financial Reports (FFRs)/Quarterly: All grant recipients are required to submit 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.

Milestone/Progress Reports (MPR)/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 to FTA. The reports greatly reduce the need for on-site visits by staff.

If this information is not collected, FTA could not ensure the proper expenditure of federal funds or assess the program effectiveness.

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

FTA's electronic grant making and management system is a paperless, electronic grant application, review, approval, acceptance and management process. FTA anticipates that approximately 100 percent of the periodic reports that grantees are required to submit will be submitted electronically. Grantees are also encouraged to 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 project management reports are project-specific and therefore 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 these and other reports were required less frequently, additional site visits by agency staff would be required to ensure compliance with program objectives.

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 9, 2016 Vol.81, No.237 (pages 89182-89183, 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 March 14, 2017 Vol. 82, No.48 (pages 13724-13725).

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.

Estimated Annual Number of Respondents: 25

Estimated Total Annual Burden Hours: 250

Estimated Total Cost: \$8,000

The estimated hourly and cost burden of the Alternative Analysis Program during the Project Management stage is presented below. The estimate is based on the review of the grantees internal documents in preparation of each of the required reports that are submitted into TrAMS by the grant recipient.

Although there is no new funding available for this program, there are currently a total of 25 respondents that are required to continue reporting information under the project management stage. All 25 respondents must submit the FFR on a quarterly basis (25 x 4 = 100 reports). There are a total of 25 respondents that must submit a MPR on an annual basis (25 x 1 = 25 reports). Therefore, there are a total of 125 reports (100 + 25) reports submitted on an annual basis. If each report takes approximately 2 hours to complete, the total annual burden hours is 250 hours (125 x 2).

Report Requirements	# Total Respondents	#Total Submissions/Reports Annually	Burden hours per submission
Federal Financial Reports (FFR) Submitted Quarterly	25	100	2
Milestones/Progress Reports (MPR) Submitted Semi- Annually 16,696	25	25	2

Estimate of the cost to respondents:

Project Management Stage:

It is estimated to take each respondent approximately (2) hours to prepare and submit the FFRs and/or MPRs at an average salary of \$32 per hour or \$64 per report. There are a total of 125

reports annually; therefore, the cost is estimated to be (\$64 per report x 125 reports = \$8,000)

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 items 12 and 14.

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

The average FTA employee reviewing program management reports (FFRs and MPRs) submitted into TrAMS by recipients is between a GS-12 and GS-13 (average salary, \$42 per hour). It takes approximately 1 hour per report for review. There are 125 reports per year. Thus, the total annual hours spent reviewing reports is 125 hours (125 x1).

The total cost to the federal government is \$5,250 (\$42 per hour x 125 hours = \$5,250).

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

Moving Ahead for Progress in the 21st Century Act (MAP-21) repealed the Alternative Analysis program. FTA no longer conducts competitive application reviews and project justifications. As a result, there is a decrease in the respondents and burden hours.

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.