

DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION

JUSTIFICATION STATEMENT

**Over-the-Road Bus (OTRB) Accessibility Program
(OMB # 2132-0570)**

Summary of Submission

This justification statement is associated with a request for a revision of a currently approved information collection. The total number of respondents decreased from 100 in the previous collection to 16 respondents in the current submission. The burden hours associated with this submission and accounted has also been reduced from 800 hours in the previous information to 144 hours. The change in this collection reflects a reduction in burden on the public and federal government due to the OTRB Accessibility program being repealed under Moving Ahead for Progress in the 21st Century (MAP-21). Fiscal Year (FY) 2012 was the last year for discretionary awards under this program.

1. EXPLAIN THE CIRCUMSTANCE THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

Under this program, the Federal Transit Administration (FTA) provided financial assistance to providers of intercity fixed-route service, and to other providers of over-the-road bus (OTRB) accessibility services, including local fixed-route service, commuter service, and charter and tour service. These services are an important element of the U.S. transportation system. Before being repealed, the program was originally authorized under Section 3038 of the Transportation Equity Act for the 21st Century (TEA-21), Pub. L. 105-85 as amended by the Safe, Accountable, Flexible, Efficient, Transportation Equity Act: A Legacy for Users (SAFETEA-LU), Pub. L 109-059, August 10, 2005.

Federal Transit funds were available to intercity fixed-route providers and other OTRB providers at up to 90 percent of the project cost. The funding was used for the purchased of adding lifts and other accessibility components to new vehicle purchases and purchasing lifts and associated components to retrofit existing vehicles. In addition, funding for eligible training costs which included developing training materials or providing training for local providers of over-the-road bus services were also provided under this program. Typical grants under this program ranged from \$25,000 to \$180,000, with most grants being less than \$40,000, for lift equipment for one bus.

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 Since being repealed, the program no longer announces grant funding opportunities, thus totally eliminating the application stage.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. INDICATE 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 OTRB 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, AND TO WHAT EXTENT, THE COLLECTION OF INFORMATION INVOLVES THE USE OF AUTOMATED, ELECTRONIC, MECHANICAL, OR OTHER TECHNOLOGICAL COLLECTIONS TECHNIQUES OR OTHER FORMS OF INFORMATION TECHNOLOGY

FTA's electronic grant making and management system is a paperless, electronic grant application, review, approval, acceptance and management process. All respondents (100%) exercised the electronic submission option for the FFRs and MPRs. Grantees are also encouraged to use the electronic system for signature of annual certifications and assurances. All respondents (100%) exercised the electronic submission option.

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. There is no duplication.

5. IF THE COLLECTION OF INFORMATION IMPACTS SMALL BUSINESS OR OTHER SMALL ENTITIES, DESCRIBE THE METHODS USED TO MINIMIZE BURDEN.

The information collection does not directly involve small businesses.

6. DESCRIBE CONSEQUENCES TO FEDERAL PROGRAMS OR POLICY ACTIVITIES IF THE COLLECTION WERE CONDUCTED 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 and/or federal requirements.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES THAT REQUIRE THE COLLECTION TO BE CITED IN A MANNER INCONSISTENT WITH THE GUIDELINES IN 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.

A 60-day Federal Register notice was published on March 14, 2017 Vol. 82, No. 48 page 13726-13727. No comments were received from that notice. A 30-day Federal Register notice was published on May 19, 2017 Vol. 82. No.96 (pg. 23129), soliciting comments prior to submission to OMB.

9. EXPLAIN ANY DECISION TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS, OTHER THAN REMUNERATION OF CONTRACTORS OR GRANTEEES.

No payment or gift is made to respondents.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS AND THE BASIS FOR ASSURANCE IN STATUTE, REGULATIONS, OR AGENCY POLICY.

There is no assurance of confidentiality regarding these submissions.

11. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF SENSITIVE NATURE.

No questions of a sensitive nature are involved.

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

Estimated Annual Number of Respondents: 16

Estimated Total Annual Burden Hours: 144 hours

Estimated Total Cost: \$4,608

The estimated hourly and cost burden of the OTRB 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. Due to the program being repealed, the level of activity concerning each grant and the information required for updating in the report has been significantly reduced.

Although there is no new funding available for this program, there are currently a total of 16 respondents that are required to continue reporting information under the project management stage. All 16 respondents must submit the FFR on a quarterly basis (16 x 4 = 64 reports). There are a total of 16 respondents that must submit a MPR on an annual basis (16 x 1 = 16 reports). Therefore, there are a total of 80 reports (64 + 16) reports submitted on an annual basis. If each FFR report takes approximately 2 hours to complete, the total annual burden hours are 128 hours (16 x 2). It is estimated that each MPR report takes approximately 1 hour to complete for a total of 16 hours (16 x 1). Therefore, the total burden hours to complete both the FFR and the MPR is 144 hours (128 + 16).

Report Requirements	# Total Respondents	#Total Submissions/Reports Annually	Burden hours per submission	Total Annual Burden Hours
Federal Financial Reports (FFR) Submitted Quarterly	16	64	2	128 hours
Milestones/Progress Reports (MPR) Submitted Annually 16,696	16	16	1	16 hours

Estimate of the cost to respondents:

Project Management Stage:

It is estimated to take each respondent approximately (2) hours total to prepare and submit the FFRs at an average salary of \$32 per hour or \$64 per report. It takes approximately (1) hour to prepare and the submit the MPR at an average salary of \$32 per hour or \$32 hours per report. There are a total of 80 reports annually; therefore, the cost is estimated to be \$4,608 (\$64 per FFR report x 64 FFR reports = \$4,096 and \$32 per MPR report x 16 MPR reports = \$512)

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).

There is no additional cost other than the hour burdens as listed in items 12 and 14 of this justification statement. This information collection requires no additional overhead and the annual cost burden is therefore \$0.

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

The average FTA program manager reviewing the OTRB 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 given that the program has been repealed and most of the information that is updated by the grantee on an annual basis is minimal. There are 80 reports per year. Thus, the total annual hours spent reviewing reports is 80 hours (80 x 1).

The total cost to the federal government is \$3,360 (\$42 per hour x 80 hours = \$3,360).

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

The burden associated with the program management stage has been significantly reduced as a result of the program being repealed under MAP-21. There has been no new federal funding for the program since 2012. As a result, the reporting of information is limited to those grantees associated with previous allocations of funding, which has been reduced to approximately 16 active grants, reducing the burden hours to 144 hours.

16. PLANS FOR TABULATION AND PUBLICATION OF COLLECTION 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 FOR 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 OMB FORM 83-I.

No exceptions are stated.