

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reduction in burden on the public and federal government due to the Job Access and Reverse Commute (JARC) Program being repealed by Congress under the Moving Ahead for Progress in the 21st Century Act (MAP-21) and reduction in open grants and corresponding reporting requirements. As a result, the application stage and all information collected as part of this process in the program have been eliminated. Once all funds are fully expended and the reporting requirements expire, this information collection will be discontinued.

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On October 1, 2013, the Job Access and Reverse Commute (JARC) Program was repealed by Congress under the Moving Ahead for Progress in the 21st Century Act (MAP-21).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 Since being repealed, the program no longer announces grant funding opportunities, thus eliminating the application stage.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 Transit Award Management System (TrAMS) 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 infrastructure goal in the Departmental Strategic Plan for FY 2018-2022. The infrastructure goal states that DOT will invest in Infrastructure to ensure safety, mobility and accessibility and to stimulate economic growth, productivity and competitiveness for American workers and businesses.

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 Transit Award Management System (TrAMS) 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 May 31, 2018 Vol. 83, No.105 (page 25103) soliciting comments prior to submission to the Office of Management and Budget (OMB). No comments were received from that notice. A 30-day Federal Register notice was published on September 6, 2018 Vol. 83 No. 173 (pages 45301-45302).

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: 160

Estimated Annual Number of Responses: 1805

Estimated Total Annual Burden Hours: 3,971

Estimated Annual Total Cost to Respondent: \$130,645.90

Report Requirements	# Total Open Grants	#Total Submissions/ Reports Annually	Burden hours per submission	Total Submissions/ Reports Annual Burden Hours
Federal Financial Reports (FFR) Submitted Quarterly	361	1,444	2	2,888
Milestones/ Progress Reports (MPR) Submitted Annually 16,696	361	361	3	1,083
Totals	361	1,805	N/A	3,971

There is currently a total of **(160)** respondents/grantees. Some respondents/grantees have been awarded funding for more than one project resulting, in a total of **(361)** active transit projects that require reporting to FTA. The chart is detailed below:

Total Annual Responses: 1805 (1,444 FFRs + 361 MPRs)

(361 existing projects x 4 quarterly reports =1444 FFR annual reports).

(361 projects x 1 yearly = 361 MPRs annual reports)

Total Annual Burden Hours: 3,971 (2,888 FFRs + 1,083 MPRs)

The time allotted to compile the required reports has decreased dramatically because the projects are near completion and there are less financial and milestone updates to make in TrAMS.

(1,444 FFRs x 2 hours to review = 2,888 burden hours)

(361 MPRs x 3 hours to review = 1,083 burden hours)

Estimated Cost to Respondents:

Project Management Stage:

FTA estimates that a Business and Financial Operations Personnel/Cost Estimator (occupation code 13-1051 <https://www.bls.gov/oes/current/oes131051.htm>) will be involved in the preparation of the request. As stated above it is estimated to take each respondent approximately 2 hours per report to prepare and submit the quarterly FFRs. It is estimated that (1) individual will prepare each report at the mean salary of \$32.90 per hour for a cost of \$65.80 per grant. The total annual cost for preparing and reporting the FFR reports is \$95,015.20 (65.80 x 1444).

It is estimated to take each respondent approximately 3 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 \$32.90 per hour for a total cost of \$98.70 per grant. The total cost to the respondents to prepare and submit MPR's on annual basis is \$35,630.70 or (98.70 x 361).

The total annual burden cost to the respondents for preparing and submitting both the FFR and the MPR reports is **\$130,645.90** (95,015.20 + 35,630.70).

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 average salary of grant program managers in the Office of Program Management, the employee reviewing program management reports (FFRs and MPRs) submitted into TrAMS by recipients is a

GS-12 step 5 (average salary, \$44.28 per hour <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2018/general-schedule/>). If you include a 28% benefits adjustment, the average salary is \$56.68. If takes (1) federal employee approximately 2 hours per report (FFRs and MPRs) for review, the total cost is \$113.36 per report. There are 1,805 total annual report submissions, thus the total cost to the government for the project management stage is **\$204,614.80** (113.36 x 1805).

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

The annual burden hours decreased from 52,080 hours in the previous request to 3,971 hours for the current request, representing a decrease of 48,109 hours. The decrease is due to the decline in the open grants and the amount of hours/effort to submit both FFR's and MPR's. As grants reach the end of their project life cycle, there are less activities occurring and therefore less information that needs to be reported. In addition, since the activities have previously been uploaded into the TrAMS system, the respondent is simply providing a status on detailed project information that had previously been submitted. The burden hours will continue to decrease until all funds are expended and no reporting is required. This IC will be discontinued at this point.

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.