DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION

SUPPORTING STATEMENT
National Transit Database
OMB Control No. 2132-0008

ABSTRACT
This is to request the Office of Management and Budget (OMB) renew the current approval of the OMB Control Number 2132-0008, "National Transit Database" information collection request, which is currently due to expire on November 30, 2019, and extend it for three years. This request is for an extension without change of a currently approved information collection. Although there are no programmatic or policy changes in the program there is a small increase in the number of respondents and estimated burden. The respondents increased because of new transit providers entering the industry and being required to now report to NTD annually. The increase in burden hours was primarily driven by an increase in reportable safety events and the addition of the new respondents. The change in this collection reflects an increase in total estimated burden hours from 323,435 in the 2016 approved information collection to a new estimated annual total burden hours of 327,524.

The National Transit Database (NTD) was established by Congress to be the Nation's primary source for information and statistics on the transit systems of the United States. Recipients of grants from the Federal Transit Administration (FTA) under the Urbanized Area Formula Program (§5307) or Other than Urbanized Area (Rural) Formula Program (§5311) are required by statute to submit data to the NTD. The NTD is designed to support local, state and regional planning efforts and help governments and other decision-makers make multi-year comparisons and perform trend analyses. It contains a wealth of information such as agency funding sources, inventories of vehicles and maintenance facilities, safety event reports, measures of transit service provided and consumed, and data on transit employees.

NTD was reauthorized under the Fixing America's Surface Transportation Act (FAST). There have been no changes in the collected of information since 2016. NTD reports from transit agencies continue to include an asset inventory, safety event reporting, asset condition reporting, and Transit Asset Management Program target reporting. The detailed safety event reporting was also updated to align with safety rulemakings authorized under 49 CFR 674.

A. Justification

1. **Circumstances that make the collection of information necessary**
   National Transit Database (NTD) system is a statutory requirement. 49 U.S.C. 5335 requires the Secretary to "maintain a reporting system, using uniform categories to accumulate public transportation financial, operating, and asset condition information using a uniform system of accounts." Additionally, 49 U.S.C. 5335(b) specifies that the Secretary may award grants under the Federal Transit Administration's Urbanized Area Formula Program or Rural Area Formula Program (Sections 5307 and 5311) "only if the applicant and any person that will receive benefits directly from the grant are subject to the reporting and uniform systems." The NTD is the reporting system established to meet these requirements. By defining a national set of performance

and financial metrics that are reported across the industry according to a standard set of rules, the NTD provides a common data vocabulary for evaluating and understanding public transportation issues. In 2012, MAP-21 added a new subpart (c) to 49 U.S.C. 5335 that requires recipients of a grant under this chapter to report 'any information relating to a transit asset inventory or condition assessment conducted by the recipient'. Additionally, 49 U.S.C. 5326(c)(1) and (2) requires recipients to report annually on the condition of their transit assets as well as their progress against set performance targets.

NTD data are used to report to Congress on the condition and performance of the nation's transit systems: 49 U.S.C. 308(e) requires the Secretary to report on the performance and conditions of public mass transportation systems. This report is commonly referred to as the *Conditions and Performance Report to Congress*. The latest publication was submitted to Congress in 2015. FTA has completed a new report and it is currently being reviewed before publication. NTD is an essential source of this performance data, allowing FTA to report on overall ridership, transit capacity, and transit operating efficiency. The capital asset data collected through the NTD underpins the Transit Economic Requirements Model (TERM), which is used to estimate the nation's transit investment needs for the next twenty years, a key component of this report.

NTD data are used by multiple external stakeholders. NTD data are used by State and local governments, as well as individual transit agencies, to conduct performance benchmarking among peer transit systems. NTD data are also frequently used by academic researchers seeking to improve public transportation systems. NTD data are key components of the American Public Transportation Association's Annual Factbook and data on capital assets. Time series of NTD data are frequently used by suppliers of transit equipment and services to evaluate market trends and by government at all levels to guide transit investment decisions.

2. **How, by whom, and for what purpose the information is used and consequences if the information is not collected.**

How:
The NTD collects data through an online reporting system. Data is validated by analysts at the NTD operations center who work with the reporters to meet specific data quality standards. The respondents using the NTD consist of large urbanized transit systems, small transit systems and federally-recognized Indian Tribes as well as State and Territorial Departments of Transportation who enter data directly into the system on behalf of the transit systems in rural areas. Almost these reporters are recipients of 5307 or 5311 grant funds.

Who:
The NTD categorizes transit agencies reporting into the system by the nature and size of their service. "Full reporters" operate in urbanized areas and supply side characteristics that make them large. Full Reporters have a detailed annual report to complete. This annual report includes data transit providers collect monthly for ridership and safety events. "Reduced reporters" also operate in urbanized areas but generally have supply side characteristics on a smaller scale than those of Full Reporters; reduced reporting is granted via waiver request. "Rural Reporters" operate in other than urbanized areas. Rural Reporters have reduced reporting requirements which are like those

reporting requirements of Reduced Reporters. FTA estimates it takes some 140 hours to gather the data, review and submit the annual NTD report.

For What Purpose:

NTD data are used by FTA, Congress, State and local governments, academic institutions, and individual transit agencies to understand the impacts of previous investments in public transportation and for performance benchmarking. NTD data are also the only source of operating costs for various transit modes. All levels of government, from FTA to the state and local level use these data to make public transportation investment decisions. These data would not be available from any other comprehensive nationwide source without the NTD.

At the local level, NTD service and performance data are often used to make funding allocation decisions when multiple transit systems service the same area. State and local governments, as well as individual transit systems, use NTD information to make performance benchmark comparisons among peer groups of transit systems. Without NTD data, there would be no nationwide source for this sort of benchmarking, which would make it harder for transit managers to drive efficiency improvements in their own systems.

By including a directive for a National Transit Asset Management (TAM) system in MAP-21, Congress drew attention to the need for more robust asset management practices in order to address aging transit infrastructure nationwide. The NTD collects asset inventory for the TAM program which was included as part of the 2016 IC approved renewal. This inventory is one important part of standardizing and strengthening asset management practices throughout the transit industry. The reporting requirements were fully implemented in report year 2018.

In addition to creating a national standard, the asset inventory will allow for a more robust analysis of the nation's state of good repair backlog. An estimate of the transit industry's state of good repair backlog is currently reported biannually to the congress in the Conditions and Performance Report. The current backlog estimates are being derived through annual asset surveys provided by transit agencies. A systematic collection of this information through the NTD will allow for a much more precise estimate of the national condition of transit assets as well as their funding needs.

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

Data for the NTD is currently collected entirely using information technology. The NTD uses an online reporting system in which respondents enter data on their office computers. These data are checked for errors through a series of automatic validation checks and then through a visual review by a validation analyst. Information technology allows the automatic validation checks to quickly identify routine data-entry errors, and allows the validation analyst to quickly raise more complex issues with reporters – and to quickly receive responses. From 1979 to 1994, NTD data were collected through paper forms, and from 1995 to 2001 NTD data were collected through diskettes that were mailed-in. The online reporting system, in place since 2002, has significantly reduced the overall reporting burden from the paper-based and diskette-based processes.

In October of 2014, the NTD began the roll out a new on-line reporting system (NTD 2.0.). This system is now fully implemented and uses an off-the-shelf business process application that has been configured to collect transit data using NTD form pages. The new NTD reporting system has automated many of the validation checks used to ensure data quality. It was also configured to allow users to directly upload or download their data using excel templates.

4. **Describe efforts to identify duplication.**

The NTD is the only source of nationwide transit data and the only source of transit data collected according to a uniform system of accounts. Prior to the establishment of the NTD in 1979, the American Public Transit Association (APTA) collected and published financial and operating statistics based on reports from its members. This data set was limited since data was only collected from APTA members. Additionally, as a private membership organization, APTA had limited ability to validate these data, as collected from its own members, and there was no guarantee of public availability of these data. APTA has consistently supported the NTD as providing a valuable data resource for its members and for the public.

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

FTA continues to seek to reduce the overall burden of NTD reporting while maintaining the value of the NTD as a comprehensive nationwide data source.

FTA has tiered reporting requirements to allow small urban and rural reporters to submit just a few short forms to the NTD once a year. Additionally, Rural NTD data are primarily collected through the State Department of Transportation, which in many cases already has records of some of the required data, further minimizing the burden on small transit systems.

6. **Describe consequences to federal program or policy activities if data were not collected or collected less frequently.**

If data for the NTD were not collected, several federal programs would be affected, including the Urbanized Area Formula Program, the State of Good Repair Formula Program, the Rural Formula Program, the Tribal Transit Formula Program, the Bus and Bus Facilities Formula Program, the safety program, the National Transit Asset Management System, and FTA's civil rights program. Updated data would not be available for the formula apportionment, and approximately $9 billion in funds would be allocated by FTA based on outdated data. This would frustrate the Congressional intent of using the formula programs to provide additional money to those areas that invest in public transportation. FTA's safety program would be without timely data on safety events at the Nation's public transportation systems. NTD data would also not be available to FTA for reporting to Congress on the conditions and performance of the nation's public transportation systems. FTA would not have current data for estimating the Nation's public transportation state of good repair backlog. Current NTD data also would no longer be available to FTA, State and local governments, researchers, and individual transit agencies for conducting peer group analyses

and performance benchmarking activities to ensure that the nation's transit systems are run efficiently and effectively.

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

The NTD data collection is consistent with 5 CFR 1320.6.

8. **Describe efforts to consult with persons outside the agency to obtain their views.**

All National Transit Database Reporting requirements are subject to public notice-and-comment prior to implementation. The National Transit Database Program also supports at least 10 classroom training sessions each year through the National Transit Institute, as well as several webinars. Attendees at both the classroom training and the webinars frequently provide feedback on NTD reporting requirements and make suggestions for improvements. A 60-day Federal Register notice was published on July 18, 2019 (Vol. 84, FR. 34476), soliciting comments prior to the submission of this information collection to the Office of Management and budget (OMB). No comments were received from that notice. A 30-day Federal Register notice was published on October 18, 2019 (Vol. 84, FR 56010).

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.

10. **Describe any assurance of confidentiality provided by respondents.**

No assurances of confidentiality are made to respondents.

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

No sensitive information is requested or required.

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

The NTD reporters are comprised of Rural, Urban, and Small/Tribal Transit Systems. There are 2,334 reporters required to submit their report into NTD annually.

Respondents: Rural, Urban and Small/Tribal Transit Systems
Estimated Annual Number of Respondents: 2,334
Estimated Annual Burden Hours: 327,524
Estimated Total Cost to Respondents: $16,926,518
Frequency: Annual

TABLE 1: Summary of Hours of Annual Burden Calculation

Respondents	Total Respondents	Total Burden Hours Per Respondent	Total Annual Hrs.
Urban/Rural/Small/Tribal Transit Providers	2,334	140.32	327,524

TABLE 2: Cost of Annual NTD Reporting by Transit Providers

Item	Number of Reporters	Labor Category (BLS code/title*)	Labor Rate** ($/hr) (May 2018 BLS Statistic)	Cost ($1000s)
Urban Reporters	920	Business Operations Specialist	63.23	$8,162,639
Rural/Small/Tribal Systems	1414	Business Operations Specialist	44.17	$8,763,879
TOTALS	**2,334**			**$16,926,518**

*https://www.bls.gov/oes/current/oes131199.htm
**Includes 28% for fringe benefits

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 item 12.

14.   Estimate of annualized cost to the federal government.

The NTD is supported by contractors in FY 2018 at a level of approximately $4.5 million. The NTD is also supported by 3 FTE at an average GS-13 Step 5 (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/DCB.pdf) with a salary of $112,393/year for a total of $337,179. The NTD has additional administrative costs of approximately $100,000 each year for IT equipment and support. Thus, the total cost to the federal government is approximately $4,937,179.

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

This information collection request reflects a small increase IN the number of respondents as there were new transit providers (primarily rural and small systems) entering the industry and required to report into the NTD. The was also a minimal burden increase. Primarily driven by the increase in new respondents and a small increase in reportable safety events from transit providers. There

is also an increase in cost to federal government because of updated median hourly wages listed by the Bureau of Labor Statistics (BLS) and the Office of Personnel Management (OPM). There are no changes in item 13.

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

   Data from the NTD are made available electronically at www.transit.dot.gov/ntd. Data are published in various Excel-format data tables and database files. Data from each transit system reporting to the NTD is also compiled into a summary one-page data profile. Other data compilations and analyses of a more ad-hoc nature are also posted on the website.

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.**

   There are no exceptions to certification statement.