

**SUPPORTING STATEMENT**  
**National Transit Asset Management**  
**OMB CONTROL NO. 2132-0579**

**A. JUSTIFICATION**

The purpose of this request is to seek the Office of Management and Budget's (OMB) approval for an extension without change of a currently approved information collection OMB Control Number: 2132-0579, "National Transit Asset Management (TAM) System" information collection request (ICR), that is associated with 49 CFR Part 625, 49 CFR Part 630 and currently due to expire on Nov 30, 2019. This program requires FTA grantees to develop management plans for their public transportation assets, including vehicles, facilities, equipment, and other infrastructure. The Transit Asset Management (TAM) asks transit agencies to develop a strategic approach to maintain and improve capital assets. Every FTA-supported transit provider is required to inventory and assess the conditions of their assets, develop priorities for investment based on the inventory, and establish performance targets by Oct 1 2018. TAM was established under Moving Ahead for Progress in the 21<sup>st</sup> Century (MAP-21) and reauthorized by the Fixing America's Surface Transportation (FAST) Act and is intended to close the gap on aging and poorly maintained transit assets.

The first round of TAM plans was developed and completed on Oct 1 2018, this information collection covers the maintenance of that data and the burden for collecting and updating that data for the next round of TAM plans in 2022 and thus shows a decreased burden as the initial data collection is complete. The supporting statement below includes the requirements pertaining to the transit asset management requirements of the TAM Final Rule approved in 2016.

**1. Explain the circumstances that make the collection of information necessary.**

Critical to the safety and performance of a public transportation system is the condition of its capital assets—most notably, a system's equipment, rolling stock, infrastructure, and facilities. When transit systems are not in a state of good repair, the consequences include increased safety risks, decreased system reliability, higher maintenance costs, and overall lower system performance. Insufficient funding combined with inadequate asset management practices have contributed to an estimated \$86.9 billion transit state of good repair (SGR) backlog—a value derived from FTA's Transit Economic Requirements Model (TERM) Scale and representative of the

reinvestment cost to improve transit asset conditions to the midpoint of its 1(poor) to 5 (excellent) scale. Furthermore, FTA estimates that an additional \$2.5 billion per year above current funding levels from all levels of government is needed just to prevent the SGR backlog from growing; a figure that poses a significant challenge during these fiscally constrained times.

Given existing fiscal constraints, it is unlikely that the Nation's state of good repair (SGR) backlog can be addressed through increased spending alone. Rather, a systematic approach is needed to ensure that existing funding resources are strategically managed to target the SGR backlog.

The National Transit Asset Management (TAM) System is in accordance with section 20019 of the Moving Ahead for Progress in the 21<sup>st</sup> Century Act codified at 49 U.S.C.5326 (section 5326) and reiterated in the FAST Act. The National TAM System must include the following: a definition of the term "state of good repair"; a requirement that all recipients and sub-recipients under Chapter 53 develop a TAM Plan, which would include an asset inventory, an assessment of the condition of those assets, decision support tools, and investment prioritization; annual reporting requirements; and technical assistance provided by FTA to recipients, including an analytical process or decision support tool that allows for the estimation of capital asset needs and assists with investment prioritization. In addition, 49 CFR 625 (TAM Final Rule) established four SGR performance measures, and recipients are required to set performance targets based on those measures. Furthermore, each recipient is required to submit an annual report to the National Transit Database (NTD) on the condition of their public transportation systems and include a description of any change in condition since the last report and its progress towards meeting performance targets established during that fiscal year and a description of the recipients' performance targets for the subsequent fiscal year.

**2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.**

The primary users of the information will be FTA and the transit providers (FTA grant recipients and sub-recipients). The same two groups of transit providers will be providing information; Tier I provider means a recipient that owns, operates, or manages either (1) one hundred and one (101) or more

vehicles in revenue service during peak regular service across all fixed route modes or in any one non-fixed route mode, or (2) rail transit, and Tier II provider means a recipient that owns, operates, or manages (1) one hundred (100) or fewer vehicles in revenue service during peak regular service across all non-rail fixed route modes or in any one non-fixed route mode, (2) a subrecipient under the 5311 Rural Area Formula Program, (3) or any American Indian tribe. The information developed will be used in decision support tools that will assist transit providers to evaluate the current condition of their assets, project future asset condition, and prioritize investment to meet targets and improve the state of good repair of their capital assets.

The TAM Plan, which must be updated at least every four years, will help agencies to identify and prioritize investments to efficiently manage their assets, as well as assess risks that may impact safety and operational performance. The annual data progress report will help each transit provider assess the progress made towards achieving the target set previously, and identify factors which may have contributed towards their failure to achieve the target. This also will help them to identify factors that contribute to achieving the performance targets, resulting in an improved understanding of the actions and outcomes. In addition, the TAM Plan and the narrative reports can be used by transit providers to inform the public and State legislators of the providers' plans and progress towards the performance targets. This will increase transparency and accountability of the use of public funds. The annual narrative report will inform FTA on the outcomes of implementing a TAM System and provide insights into what issues still need to be addressed to achieve a state of good repair for the Nation's transit assets.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.**

Transit providers will develop its TAM Plan with computing software, such as Microsoft word or excel, and graphical software. FTA will verify compliance with the TAM Plan requirements during the Triennial or State Management review process, which are FTA's existing audit processes. The annual narrative report, performance targets, and the asset condition report will be submitted electronically to the National Transit Database (NTD) every year. The performance targets will be included in the narrative report. The

collection of this information is already included in another information collection (IC); National Transit Database (NTD) Asset Inventory Module 49 U.S.C. Section 5335(c). Since this information is already collected in another IC, there is no duplication of burden reporting.

TAM must include analytical tools to analyze the data to develop project priority lists, and performance measures and targets. Analytical tools can be developed with readily available off-the shelf software such as Microsoft Excel. Transit providers also may choose to purchase software depending on the provider's needs. In addition, transit providers may use FTA's TERM-Lite model free of charge.

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

FTA has taken several steps to gather information from the transit industry to develop TAM and continues to gather information. In addition to the extensive stakeholder information gathering for the rulemaking in 2016 FTA has continued to hold annual in-person roundtables that host 80-100 transit attendees, bimonthly webinars with 200-300 attendees, quarterly newsletters, and presentations at industry conferences including APTA, CTAA and AASHTO.

Each occasion provided an opportunity to highlight any potential duplication in the requirements and what may be required elsewhere.

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

To minimize burden on small transit service providers, recipients are categorized into two tiers, with fewer requirements for the smaller transit service providers. The smaller entities are classified as Tier II providers meaning a recipient that owns, operates, or manages (1) one hundred (100) or fewer vehicles in revenue service during peak regular service across all non-rail fixed route modes or in any one non-fixed route mode, (2) a subrecipient under the 5311 Rural Area Formula Program, (3) or any American Indian tribe. These recipients have the option of participating in a Group TAM Plan that is developed by a direct recipient such as a State or other designated recipient. Tier II providers are only required to develop a less burdensome TAM Plan by excluding the requirements for identifying policies and strategies to achieve transit asset management; strategies for implementation of the TAM Plan; a list of key activities to achieve asset

goals; identification of financial resources to meet the asset management goals; and a plan for continuous improvement.

**6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

A less than annual reporting of this information would not be sufficient to know the condition of transit revenue vehicle fleet. This information is used for estimating the future transit investment needs reported in the Condition and Performance Report produced by U.S.DOT. The last report was published in 2015, however the new report is forthcoming in the next few months. For some assets, such as stations and facilities, the condition data will be collected every three years. In addition, FTA is not collecting condition data for any assets that transit providers do not have direct capital responsibility for. If asset condition reporting occurred less frequently, the value derived from a better understanding of changes in asset condition would be compromised by limiting the ability to understand trends overtime. FTA would use annual reporting of SGR performance targets to identify what each transit provider is planning to achieve each year and measure an individual transit provider's progress towards meeting SGR.

**7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.**

The information collection fully applies with 5 CFR 1320.6

**8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

A 60-day Federal Register notice was published on July 31, 2019 (Vol. 84, FR. 37388), 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 56011).

FTA engaged in stakeholder outreach including, a bimonthly webinar series with approximately 200-300 attendees each to inform and educate transit providers of the TAM. In addition, FTA hosts an annual in-person roundtable which attracts 80-100 transit practitioners. FTA also conducted informal presentations at workgroup and association meetings. FTA will continue to provide outreach to stakeholders.

**9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.**

No payment or gift is made to respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.**

Respondents are not provided any assurance of confidentiality. The data is used for determining eligibility for receipt of grant funds and compliance with statutory requirements.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

The documents do not require any information of a sensitive nature such as sexual behavior or attitudes, religious beliefs, or other matters that are commonly considered private. None of the information required is of a personal nature.

**12. Provide an estimate in hours of the burden of the collection of information.**

Total Annual Respondents: 2,878 (164 Tier I + 2,714 Tier II)

Total Annual Responses: 987 (164 Tier I + 823 Tier II)

Total Annual Burden Hours: 404,233 (161,596 Tier I + 242,637 Tier II)

Total Annual Burden Cost: \$19,077,332 (\$7,968,880 Tier I + \$11,108,452 Tier II)

**Estimated Total Annual Number of Respondents and Responses:**

Tier I:

There are 164 Tier I providers. These are direct/individual transit providers that submit one Transit Asset Management Plan for a total of 164

plans/responses on an annual basis.

Tier II:

There are 2,714 Tier II providers. Of the 2,714 transit providers, only 823 TAM Plans/responses are developed on an annual basis [756 (Individual Plans) + 67 (Group Plans)] because many designated recipients will develop Group TAM Plans for their subrecipients which includes data for all of its subrecipients. Accordingly, a Group TAM Plan Sponsor (designated recipient) would submit one data report and one narrative report on behalf of all the Group TAM Plan participants (subrecipients).

#### Estimated Total Annual Burden Hours and Cost:

Tier I:

FTA estimates that the total annual burden hours associated with this information collection for Tier I providers is 161,596. FTA estimates that the total annual burden cost associated with this information collection for Tier I providers is \$7,968,880.

Tier II:

FTA estimates the total annual burden hours associated with this information collection for Tier II providers is 242,637 hours. FTA estimates that the total annual burden cost associated with this information collection for Tier II providers is \$11,108,452.

Tables 1 and 2 below show the hours of burden and the dollar cost incurred by Tier I and Tier II transit providers implementing the TAM Rule. The tables show the assumptions made for the level of effort and the loaded wage rates (wage rate adjusted to account for employer cost of fringe benefits)<sup>1</sup> used for estimating the hours of burden and the cost of implementing the Rule.

The TAM regulation calls for some other activities to be repeated less than annually, such as every three years (e.g., condition assessment for stations and facilities) or every four years. In all cases, the reported burden hours and costs in the table represent an annualized average - i.e., the total estimated cost of the activity divided by the number of years in the cycle.

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<sup>1</sup> BLS data show wages as 62.5% of total compensation, with benefits at 37.5%. Therefore, employees' wages are factored by 1.60 (100 / 62.5) to account for employer provided benefits.

**Table 1: Tier I Operators (More Than 100 Vehicles and Rail Fixed Guideway)**

Item	Labor Rate (\$/hr) Urban	Average Annual Recurring Hours of Burden	Average Annual Recurring Costs
	(May 2018 BLS Statistic) <sup>1</sup>		
Asset Assessment	\$49.28	84,054	\$4,142,197
Asset Inventory	\$49.28	5,904	\$290,949
Analytical Processes	\$49.28	34,112	\$1,681,039
Project List	\$49.28	5,904	\$290,949
Strategy and Other Plan Items	\$68.32	13,120	\$224,090
Performance Management	\$68.32	5,904	\$403,361
NTD Reporting	\$44.74	9,318	\$416,877
Narrative Reporting and Review	\$68.32	3,280	\$224,090
TAM Plan Management (Planning/Recordkeeping, and IT)	\$44.74	6601	\$295,329
<b>Total Annual Dollar Cost and Hours of Burden</b>		161,596	\$7,968,880

**Table 2: Tier II Operators (100 Vehicles or Less and No Rail Fixed Guideway)**

Item	Labor Rate (\$/hr) Urban	Average Annual Recurring Hours of Burden	Average Annual Recurring Cost
	(May 2018 BLS Statistic) <sup>1</sup>		
Asset Assessment	\$49.50	40,912	\$2,025,128
Asset Inventory	\$49.50	29,628	\$1,466,586
Analytical Processes	\$49.50	85,592	\$4,236,804
Project List	\$49.50	19,752	\$977,724
Performance Management	\$62.03	19,752	\$1,225,217
NTD Reporting	\$49.50	5,029	\$248,918
Narrative Report and Review	\$62.03	8,230	\$510,507
TAM Management Plan (Planning/Recordkeeping and IT)	\$49.50	33,743	\$417,570
<b>Total Recurring Average Annual Dollar Cost and Hours of Burden</b>		242,637	\$11,108,452

**13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question 12 above).**

FTA estimates no other costs to respondents' other than the costs associated with the paperwork burden hours shown in item #12 above (which are not to be included in item #13). There are no capital/start-up costs or



operation/maintenance costs associated with the information collection burden.

**14. Provide estimates of annualized cost to the Federal government.**

The TAM is supported by contracts in FY 2019 at a level of approximately \$300,000. The TAM program is also supported by 2.5 FTE in DC at an average GS-13 Step 6 <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/DCB.pdf>) with a salary of \$115,699/year for a total of \$289,247.5. Another 10 partial FTE support the TAM program throughout the country in each of the 10 FTA regional offices at an average GS-11 Step 5 <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/GS.pdf> with a salary of \$60,981. The TAM program has additional administrative costs of approximately \$1 million each year for support. Thus the total cost to the federal government is approximately \$1,650,228.50.

There will be additional costs to the Federal government to collect, analyze and publish the new data requested under TAM. These costs are covered by another information collection National Transit Database (OMB #2132-0008).

**15. Explain the reasons for any program changes or adjustments.**

This information collection reflects an increase in respondents but an overall decrease in total annual burden hours. In 2016, TAM was a new information collection associated with a rule. During the first three years since implementation, data entered into NTD indicates that the original number of Tier I respondents was estimated too high. There were fewer Tier I and more Tier II than previously estimated. The increase in Tier II grantees increased the total annual respondents. Additionally, the first TAM plans were completed in October 2018 and therefore the initial burden of collecting new information has decreased. Recipients are now only required to maintain the data and update their TAM plans every four years. Thus, this information collection now reflects an overall decrease in burden hours. These revised values are based on data reported to the NTD for fiscal year 2018.

**16. For collections whose results will be published, outline the plans for tabulation and publication.**

FTA will tabulate the data and make it available to the public through the National Transit Database website.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.**

FTA is not seeking approval to the exception.

**18. Explain each exception to the certification statement.**

Not applicable.

**B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS**

The collection does not employ statistical methods.