

Department of the Treasury
Information Collection Request – Supporting Statement
Coronavirus Economic Relief for Transportation Services (CERTS)
OMB No. 1505-0273

A. Justification

1. Circumstances necessitating the collection of information

Justification for Emergency Processing:

On December 27, 2020, the President signed the Consolidated Appropriations Act, 2021 (the “Act”). Division N, Title IV, Subtitle B, Section 421 of the Act provides \$2 billion for the U.S. Department of the Treasury (“Treasury”) to provide grants to eligible providers of transportation services (“Recipients”) under the Coronavirus Economic Relief for Transportation Services (“CERTS”) Program. Recipients include motorcoach companies, school bus companies, passenger vessel companies, and pilotage companies. Under Section 421 of the Act, Recipients must demonstrate significant revenue losses as a result of COVID-19, and must use grant funds for payroll costs and for other eligible operating expenses. Treasury intends to begin making payments as soon as possible given the urgent need for funds, and requests emergency processing for the CERTS Application Form.

CERTS Application Form

A Recipient must submit an application to be considered for a CERTS grant. Treasury will review each application submitted by the deadline to validate company identity and eligibility, to assess the accuracy and completeness of information submitted, and to confirm other attributes consistent with the CERTS statute. All applications will be subject to uniform standards of review that will be applied equally. To determine grant amounts, Treasury will review each applicant’s financial information, such as annual revenues and year-over-year lost revenues, and apply a formula that provides each approved applicant with an equitable, proportionate share of the funding appropriated by Congress for the program.

CERTS Compliance Reporting Form

A Recipient must submit regular quarterly reports to be in compliance with the terms of their CERTS grant, including formal certification that the grantee has used funds for eligible expenses. Treasury will review each response to assess the accuracy and completeness of information submitted, and to confirm other attributes consistent with the CERTS statute. Treasury will also use the data on funds expended and use of funds to identify program impacts and efficacy.

There will be up to five quarterly reports per recipient. As the grant agreement states that all funds must be expended within one year, recipient would not need to continue filing reports after they indicated that they had expended all funds in the previous quarter; as many of these firms

are expected to expend all funds quickly, Treasury expects some Recipients to close out their reporting prior to the final reporting period.

2. Use of the data

The information reported will allow Treasury to verify that grantees are in compliance with the grant agreements. Treasury will also use the self-reported information on use of funds to track the amount of funds expended, including the breakdown of how funds are used in different eligible categories. This information will help both with tracking compliance and assessing program impacts.

3. Use of information technology

Treasury will manage the submission process through widely available technology including secure web portal and e-mail.

4. Efforts to identify duplication

The information collections are in support of a new statutory authority, and the information is not known to overlap with any other data collected under any other information collections at Treasury. Furthermore, the information collection is tailored to leverage data that Recipients already have and to require additional data only to the extent that is strictly necessary to validate eligibility consistent with the statute.

5. Impact on small entities

This collection of information will minimally affect small entities. However, Treasury will attempt to minimize burden on small entities to the greatest extent practicable through detailed instructions within the CERTS application form and compliance reports, and automated workflows within the CERTS application form and compliance reports that will dynamically present only those questions necessary for a given applicant type.

6. Consequences of less frequent collection and obstacles to burden reduction

Treasury will collect only the information required to track when funds are expended and that the expenditures are on eligible uses. Most of the information will be readily available to the Recipients in the ordinary course of business. If the Recipients are unable to provide necessary information on expenditures, or even that funds have been expended, then Treasury would be required to claw back grant awards from those Recipients. Without these quarterly reports, and without the certification by Recipients that they have used funds on eligible expenses, Treasury would have difficulty verifying that Recipients are in compliance and that the funds are used for their designated purpose.

7. Circumstances requiring special information collection

There are no special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

8. Solicitation of comments on information collection and justification for expedited processing pursuant to 5 C.F.R. § 1320.13

This Information Collection Request is submitted under emergency clearance procedures in order to expedite dissemination of instructions to Grant Recipients; due to most recipients being small businesses, many of whom are experiencing hiring problems, extended review of finalized reporting guidance is needed to ensure both accuracy of reports and includes both support from Treasury and outreach through industry groups. As such, advance public notice and comment is not possible.

9. Provision of payments to respondents

No payments or gifts are provided to respondents.

10. Assurance of confidentiality

Information collected will be kept confidential to the extent appropriate and consistent with the Freedom of Information Act and other applicable laws.

11. Justification of sensitive questions

No sensitive questions will be asked of eligible grantees.

12. Estimate of the hour burden of information collection

The CERTS Grant Application burden estimate is as follows:

Reporting	# Respondents	# Responses Per Respondent	Total Responses	Hours per response	Total Burden in Hours	Cost to Respondent (\$47.50 per hour*)
CERTS Application	8,000	1	8,000	2 (120 minutes)	16,000	\$760,000
CERTS Compliance Reports (initial and quarterly reporting)	1,460	4	5,840	1.5 hours	8,760	\$416,100
Total	9,460		13,840		24,760	\$1,176,100

* Bureau of Labor Statistics (BLS), U.S. Department of Labor, Occupational Outlook Handbook, Accountants and Auditors, on the Internet at <https://www.bls.gov/ooh/business-and-financial/accountants-and-auditors.htm> (visited December 30, 2020). In 2019, the median pay for accounts and auditors was \$34.40/hour. To account for the fully-loaded employer cost of employee compensation, the median pay is increased by 38%, resulting in a fully-loaded wage rate of \$47.50. According to BLS's Employer Cost for Employee Compensation from September 2020 (released on December 17, 2020: <https://www.bls.gov/news.release/pdf/ecec.pdf>), employers provided 38% of total employee compensation in the form of non-wage compensation (i.e., benefits such as paid leave, health insurance, etc.) for state and local government workers.

13. Estimated total annual cost burden to respondents

There are no annualized capital/startup costs for the Recipients to provide the information.

14. Estimated cost to the federal government.

Federal costs include a total of \$1.975 billion in direct grants and up to \$25 million in administrative expenses. To date, \$1.973 billion has been paid to grant recipients.

15. Reasons for change in burden

This revision request is to add the CERTS Compliance Reports to the OMB approval and will increase the burden by 8,760 hours.

16. Plans for tabulation, statistical analysis and publication

Treasury plans to publish grant and payment amounts.

17. Display of the expiration date for OMB approval

Treasury requests permission to omit display of the expiration date in order to avoid potential confusion among stakeholders about the acceptance dates of the application and compliance reports.

18. Exceptions to submission requirements

There are no exceptions to the submission requirements.

Part B. Describe the use of statistical methods such as sampling or imputation.

This collection does not employ statistical methods.