

DEPARTMENT OF TRANSPORTATION
INFORMATION COLLECTION
SUPPORTING STATEMENT
Disadvantaged Business Enterprise Program Collections
OMB CONTROL NUMBER: 2105-0510

Introduction

This is to request the Office of Management and Budget's (OMB) renewed three-year approved clearance for the information collection entitled "Disadvantaged Business Enterprise Program Collections" (Collection). The Collection includes five instruments that OMB approved in August 2015 and October 2018.

The Disadvantaged Business Enterprise (DBE) program is statutorily mandated and intended to assist small businesses owned and controlled by socially and economically disadvantaged individuals compete fairly in the Department's highway, mass transit, and airport financial assistance programs. The statutory provision governing the DBE program in the highway and mass transit financial assistance programs is the Infrastructure Investment and Jobs Act (IIJA), Pub. L. 117-58 (Nov. 15, 2021) and the statutory provision governing the DBE program as it relates to airport financial assistance programs is 49 U.S.C. 47113. The Department's final regulations implementing these statutes are found in 49 CFR Part 26. The DBE program is implemented by recipients of DOT financial assistance (state highway agencies, transit authorities, and airports).

The five collection instruments described in this supporting statement all support DOT's mission of establishing economic equity for small businesses owned by disadvantaged individuals and promoting development opportunities for them. The collections also help ensure that state and local recipients that let federally funded contracts carry out their mandated responsibility to ensure that only eligible businesses may compete for such contracts as a DBE or Airport Concession DBE (ACDBE). Hereinafter, DBE and ACDBE are referred to collectively (for purposes of this renewal request) as "firm" or "DBE." The five instruments are (1) Uniform Report of DBE Awards or Commitments and Payments (Uniform Report), (2) Uniform Certification Application (UCA), (3) Annual Affidavit of No Change, (4) Personal Net Worth (PNW) Form, and (5) Percentages of DBEs in Various Categories.

Part A. Justification

1. Circumstances that make the collection of information necessary. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each section of each statute and regulation mandating or authorizing the collection of information.

- The Uniform Report is required by § 26.11 and 26.47. Without it, the Department would not be able to carry out its oversight responsibilities because the Department would not be able to obtain information from funding recipients about the participation they obtain in their DBE programs.
- The UCA is necessary to implement 49 CFR § 26.83(c)(7)(i). Completion and submission of the UCA by DBE program applicants is necessary for certifying agencies in the Unified Certification Programs (UCPs) to determine whether a particular firm qualifies for certification as a DBE. This collection, therefore, serves the important goal of ensuring that firms participating in the program are owned and controlled by socially and economically disadvantaged individuals.
- The Annual Affidavit of No Change is mandated by 49 CFR § 26.83(j) and is necessary to ensure the integrity of the DBE program, which requires DBEs to annually state that they remain eligible for the program. A firm that fails to submit this form will be deemed to have failed to cooperate and could be subject to decertification. This collection is necessary to ensure the integrity of the DBE program because it requires DBEs to affirm in a notarized affidavit that they are still eligible to participate in the program. Since DBEs are not required to reapply after they are certified, this affidavit (along with information documenting the firm's gross receipts) is the only information DBEs are required to submit regularly to the UCP to maintain their certification, absent certain changes in circumstances identified in § 26.83(i).
- The PNW Form is necessary to implement the requirement found in 49 CFR §26.67(a)(2) that a firm applying for DBE certification must attest that the PNW of the qualifying owner does not exceed the current \$1.32 million maximum and provide a corroborating PNW statement. When submitted as part of the initial application, this collection allows recipients to determine whether a firm is truly owned and controlled by a disadvantaged individual with a PNW below the regulatory cap and is therefore necessary to ensure that only qualified firms are certified.
- The Percentages of DBEs in Various Categories collection is necessary to implement a long-standing statutory requirement calling on States to report the percentages of white women, minority men, and minority women who own and control DBE firms. This requirement is most recently stated at section 1101(b)(4)(A) and (B) of the FAST Act. Submission of this information will also satisfy 49 CFR. § 26.11(e).

2. How, by whom, and for what purpose the information is to be used. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

- The Uniform Report is collected bi-annually from recipients by the Department's Federal Highway Administration (FHWA) and Federal Transit Administration (FTA), and annually from recipients of the Federal Aviation Administration (FAA), is used to enable DOT to

conduct program oversight of recipients' DBE programs and to identify trends or problem areas in the program. All three Operating Administrations use an electronic collection system to collect these reports. The form requires recipients to include information about their DBE goals for that year and the DBE participation they managed to achieve during that time. The collection of this information is necessary to ensure that the DBE program is achieving its goal of encouraging DBE participation in Federal transportation-related contracts.

- For the UCA, businesses that wish to become certified as a DBE submit this information to a recipient of FAA/FHWA/or FTA funds that are members of the Unified Certification Program (UCP) and perform certification functions. The exact method of submission varies by recipient, but most applications, including the notarized form, and necessary attachments, are submitted electronically. The UCP then evaluates the application to determine whether the applicant firm meets the certification requirements set forth in the Regulation. In doing so, the UCP determines whether, among other things, the applicant firm exceeds the mandatory gross receipts cap for a DBE, and is owned and controlled by a socially and economically disadvantaged individual(s) whose personal net worth does not exceed the current cap. If a UCP is satisfied by the information provided in this collection, it will certify the DBE after conducting an onsite visit. The information provided in this collection will also be used as a basis for DOT to determine whether a UCP correctly rejected an application in the event the decision is appealed to the Department.
- For the Annual Affidavit of No Change, firms certified as DBEs must submit this affidavit annually to the UCP of every State in which they are certified. The affidavit requires that the DBE affirm that “there have been no changes in the firm’s circumstances affecting its ability to meet size, disadvantaged status, ownership, or control requirements of this part or any material changes in the information provided in its application form, except for changes about which you have notified the recipient under paragraph (i) of this section,” and that the firm “continues to meet SBA business size criteria and the overall gross receipts cap of this part, documenting this affirmation with supporting documentation of your firm's size and gross receipts.”
- The PNW Form will be used in the same manner that Small Business Administration Form 413 is currently used. That is, prospective DBEs will submit this form and necessary supporting documentation to demonstrate that the owner(s) on whom the firm relies for DBE certification eligibility is, in fact, economically disadvantaged.
- For the Percentages of DBEs in Various Categories collection, States, through their UCPs are the respondents. To carry out this requirement, UCPs review their statewide directories and count the number of firms controlled, respectively, by white women, minority or other men, and minority women. They then convert the numbers to percentages and send the results to the Departmental Office of Civil Rights. The Department uses this statutorily required information to respond to public and governmental questions regarding the DBE program, determine which States may need assistance in conducting outreach to DBEs, and assist in determining whether States' DBE goals are in line with the current make-up of DBE availability.

3. Extent of automated information collection. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

- Most recipients already use computer systems for many of these information collection tasks. FTA uses the Transit Award Management System (TrAMS) (formerly the “Transportation Electronic Awards and Management system”) to receive reporting data (<https://faces.fta.dot.gov/suite/>). FAA’s system is called the dbE-Connect (<https://faa.dbconnect.com/FAAfaa/login.asp>). FHWA uses a system called Civil Rights Connect (<https://fhwa.civilrightsconnect.com/FHWA/login.asp>).
- For the UCA, the decision regarding how a UCP will accept this form is left to the recipient. The Department has available on the DBE website copies of this form (in screen-fillable format) and links and contact information for all State UCPs. Nearly all recipients provide additional information about the application process on their websites. However, recipients generally require that application forms be submitted to the UCP by either mail or (more likely) through electronic means.
- For the Annual Affidavit of No Change, the Department provides examples of an accepted affidavit on its website, as well as contact information for all State UCP members. The UCP members also provide copies of the affidavit on their websites and many accept submission of the affidavit electronically.
- For the PNW Form, the Department makes the form available online in a screen-fillable format on the DBE website. A PDF copy is also available in the Code of Federal Regulations. The Department encourages UCPs to make the form available online as well. Like the Uniform Certification Application and Annual Affidavit, the Department anticipates that most recipients will continue the submission of this form electronically.
- For the Percentages of DBEs in Various Categories instrument, the Department anticipates that States will provide this information to the Departmental Office of Civil Rights via letter or e-mail.

4. Describe efforts to identify duplication. 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 above.

- The Uniform Report does not contain duplicative information. It is possible that some recipients also collect similar information for their own purposes, but the extent of such collections is not known and it is not required by the Department.
- For the UCA, the Department has minimized the burden of this collection in three ways. First, because each state is required to maintain a Unified Certification Program (UCP), firms need only apply once in each state in which they seek to be certified, not for each DOT recipient within that state. That is, a DBE certified by a UCP member for work it has done on a contract with the member agency is not required to resubmit this form if the DBE next wishes to perform work on a contract for a municipal transit agency or for any other recipient in that state. Next, once certified in a state, a DBE is certified unless it is decertified through the procedures found in 49 CFR § 26.87. Thus, there is no requirement that a DBE resubmit this form at any regular interval to remain certified. Finally, although DBEs are certified on a State-by-State, not federal, basis, the Department has taken steps to ease the process of a DBE that is already certified in one state to become certified in another state. Most importantly, all states are required to use this form and are not permitted to create their own form. Additionally, the Department has adopted an interstate certification process in § 26.85 that attempts to expedite the process for a DBE already certified in one state gaining certification in another state without submitting a new application. The information being requested in the form is not duplicative of other information requested as part of this program.
- For the Annual Affidavit of No Change, certified firms are only required to submit one affidavit to each state in which they are certified. However, DBEs must submit a separate affidavit to each state in which they certified; this is because certain aspects of DBE eligibility, for example the requirement of control, may vary from state to state. The Department does not view this as creating any significant additional burden, since firms may complete the affidavit and go through the notarization process for each state at the same time.
- The PNW Form does not lead to the collection of duplicative information because it replaced the Department's prior approach of requesting the Small Business Administration (SBA) form with the Uniform Certification Application. Beyond basic identifying information, the Personal Net Worth Form and Uniform Certification Application do not request the same information and are unique collections.
- The Percentages of DBEs in Various Categories is statutorily mandated, and is a different collection than the Uniform Report of Awards/Commitments and Payments. This information will be reported separately (once per year) in a letter to the Director of the Departmental Office of Civil Rights with the Office of the Secretary.

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

The Department does not foresee any increase in burden if the collections are renewed. In the past, the Department took steps to lessen the potential burden of these collections, as explained in greater detail below.

- For the Uniform Report, FTA and FAA have funding thresholds that exempt their smaller recipients from the DBE program requirements, including this report. As noted above, reporting frequencies are only annual (for FAA recipients) or semi-annual (for FTA recipients). The information on these matters is found in the DOT DBE regulation (*see* 49 CFR. §§ 26.11 and 26.21, and Appendix B).
- For the UCA, the Department attempted to make this collection as streamlined and user-friendly as possible to minimize the burden on applicants, while requiring sufficient information to maintain the integrity of the DBE program. For example, in its 2014 revision to the rule, DOT shortened the form and removed redundant and/or unnecessary fields. Further, the Department made discretionary some supporting documentation that was previously mandatory.
- The Annual Affidavit of No Change minimizes as much as possible the burden on DBEs, all of which (by definition) are small businesses. Firms are only required to submit this affidavit on an annual basis and the affidavit is essentially a “fill-in-the blank” statement, copies of which are available online on both the Department’s and states’ websites. In addition, the annual affidavit causes considerably less burden than any conceivable alternative, such as a requirement that DBEs go through a recertification process.
- For the PNW Form, the Department streamlined the document in 2014 and no longer requires that all DBEs include with the form various supporting documents and, instead, leaving it up to the UCP to request additional documentation on a case-by-case basis.
- The Percentages of DBEs in Various Categories collection only burdens State Departments of Transportation (FHWA recipients), not DBEs, airports, transit agencies, or other local government entities. (See 49 CFR. § 26.11(e)). There were no technical corrections made to this collection.

6. Impact of less frequent collection of information. Describe the consequence to federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

- For the Uniform Report, no change has been made regarding the frequency of collection. Without this information collection, there would be no way to determine whether the program’s objectives were being met, it would be impossible to determine whether the program was being administered consistent with legal and constitutional requirements, and there would be no accountability for any participants.
- For the UCA, there is no opportunity for less frequent collections of this information since a DBE is only required to fill out this form when applying to a state for the first time. The Department notes that it has long rejected any mandate that the DBEs would be required to

reapply after a set period of time, leaving it to the UCP's discretion what additional information would be required periodically as part of the UCP's program documents. The form was streamlined in 2014.

- The Department believes that less frequent collection of the Annual Affidavit of No Change (e.g., every two years rather than annually) would greatly affect the integrity of the DBE program and would lead to situations where federal money would be awarded to contracts without the participation of firms that are correctly certified as DBEs. A less frequent collection would lead to an increased risk of fraud, such as in situations where a DBE knowingly continues to participate despite changes in its circumstances. There were no revisions to this form and the frequency of collection continues to be annual.
- For the PNW Form, the requirement that the form be included with each application for certification cannot be reduced, as it is a necessary part of the initial application process. The Department streamlined this form in 2014 and made minor editorial corrections in this renewal submission.
- For the Percentages of DBEs in Various Categories instrument, the clear and unambiguous language of the DBE Program's statutory language, most recently contained in the Infrastructure Investment and Jobs Act, mandates that this information be collected annually. Historically, the Department has collected this information toward the end of the calendar year.

7. **Special Circumstances. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- **Requiring respondents to report information to the agency more often than quarterly;**
- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **Requiring respondents to submit more than an original and two copies of any document;**
- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

- That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

- Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

None.

8. Compliance with 5 CFR §1320.8(d). If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR §1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to those comments. Specifically address comments received on cost and hour burden.

Describe 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.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The Department published a 60-day Federal Register Notice addressing these five collections on April 29, 2021, FR Vol. 86, No. 80, page 22515. No comments were received during the 60-day comment period. The Department published a 30-day Federal Register Notice on September 15, 2021, FR Vol. 86, No. 176, page 51444. No comments were received. In addition, the Department contacted fewer than 10 recipients of FAA, FHWA, and FTA funds to gauge the burden associated with the instruments in this supporting statement.

Payment or gifts to respondents. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

None.

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

The UCA and the PNW Form are the only two instruments that contain such assurances. Specifically, they include statements that the Department will comply with both the Freedom of Information Act and the Privacy Act in collecting, using, and disclosing information in those documents. 49 CFR. § 26.109 contains assurances of confidentiality for any information provided by a DBE as part of the DBE program. Section 109(a)(2) states that recipients “must not release any information that may reasonably be construed as confidential business information to any third party without the written consent of the firm that submitted the information. This includes applications for DBE certification and supporting information. However, you must transmit this information to DOT in any certification appeal proceeding under § 26.89 of this part or to any other state to which the individual's firm has applied for certification under § 26.85 of this part.”

11. Justification for collection of sensitive information. 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. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from the information is requested, and any steps to be taken to obtain their consent.

Not applicable.

12. Estimate of burden hours for information requested. Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
- If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in item 14.

In the following table the description of “affected public” for each collection instrument is based on the requirements and activity descriptions in the applicable provisions of 49 CFR Part 26. For the instruments in which recipients of DOT funds are the affected public, the number of respondents is the number of recipients of DOT funds. For the instruments in which DBE applicant or certified firms are the affected public, the number of respondents is derived from a database on DOT’s website that lists the names of all certified firms as well the names of the firms that were denied certification or whose certification was removed.

DBE certification staff hourly wage rate is taken from the U.S. Bureau of Labor Statistics’ (BLS) estimate of an Eligibility Interviewer in Government Programs (OEWS Designation). The wage rate is multiplied by 1.62 to get a fully loaded hourly wage rate of \$34.77 to account for the cost of employer provided benefits. For state and local government workers, wages represent 61.9% of total compensation in 2020, therefore the multiplier is 1.62 ($1/0.619$). Given the number and geographic spread of DOT’s recipients, it was not feasible for DOT to determine the exact job classifications of employees who perform each task. Further, the geographic variances will, to an unknown extent, affect the wage rate.

COLLECTION INSTRUMENT	AFFECTED PUBLIC	NUMBER OF RESPONDENTS	FREQUENCY OF REPOSE	ESTIMATED AVERAGE ANNUALIZED HOURS BURDEN PER RESPONSE	ESTIMATED TOTAL ANNUALIZED HOURS BURDEN	ANNUALIZED HOURS BURDEN ESTIMATE SOURCE	ESTIMATED ANNUALIZED COST FOR RESPONDENTS BASED ON WAGE RATE CATEGORY
Uniform Report of DBE Awards/Commitments (49 CFR 26.11)	Recipients of DOT funds	1,198	Once per year	317 hours	379,766 hours	DOT reached out to FAA, FHWA, and FTA recipients. In 2018, DOT estimated that the average hours burden per response was five hours. In 2020 DOT reached out to fewer than 10 recipients. Their feedback resulted in the estimates below. The estimated average hours burden of 317 is the average of seven recipient responses.	\$13.2 million

COLLECTION INSTRUMENT	AFFECTED PUBLIC	NUMBER OF RESPONDENTS	FREQUENCY OF REPOSE	ESTIMATED AVERAGE ANNUALIZED HOURS BURDEN PER RESPONSE	ESTIMATED TOTAL ANNUALIZED HOURS BURDEN	ANNUALIZED HOURS BURDEN ESTIMATE SOURCE	ESTIMATED ANNUALIZED COST FOR RESPONDENTS BASED ON WAGE RATE CATEGORY
<p>Uniform Certification Application (Section 26.83(c)(7)(i) and Appendix F of 49 CFR Part 26)</p>	<p>Firms applying for DBE certification</p>	<p>9,500</p>	<p>Once during initial certification</p>	<p>40 hours</p>	<p>380,000 hours</p>	<p>Based on discussions with consultants who assist firms with completing the Uniform Certification Application, it is estimated that the total burden hours per applicant to fill out the Uniform Certification Application and gather the supporting documentation to be approximately 40 hours.</p> <p>To estimate the number of respondents, in December 2020 the Department contacted four recipients to get a rough estimate of how many</p>	<p>There is no applicable wage rate because there is no standardized way in which the many hundreds of firms applying each year operate and how they pay their employees. It is not possible for DOT to contact applicant firms for estimates because of well-established DOT protocol and potential ethical boundaries. In addition, DOT does not know the identities of applicant firms. DOT only has data about the numbers of certified firms, decertified firms, and firms whose applications were denied.</p>

						<p>applications they receive each month. Their responses ranged between 5 – 80 per month. The number cannot be precisely calculated because it is not feasible for DOT to contact all 1,198 recipients to ask them how many applications they receive each year. Nor is there a central repository that captures the number of applicants each year. In addition, the number of respondents varies significantly among the 52 jurisdictions that have a DBE program. There are likely several reasons for the variance. DOT infers that the frequency of</p>	
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						<p>submissions at times varies according to construction season (high applications when the season is over), the contracting opportunities available in the marketplace, and the number of new transportation-related business formations or expansions. Jurisdictions that have a high DBE applicant pool may receive a higher number whereas jurisdictions in remote areas of the country with smaller numbers of firms may have lower applicant requests for DBE certification.</p>	
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COLLECTION INSTRUMENT	AFFECTED PUBLIC	NUMBER OF RESPONDENTS	FREQUENCY OF REPOSE	ESTIMATED AVERAGE ANNUALIZED HOURS BURDEN PER RESPONSE	ESTIMATED TOTAL ANNUALIZED HOURS BURDEN	ANNUALIZED HOURS BURDEN ESTIMATE SOURCE	ESTIMATED ANNUALIZED COST FOR RESPONDENTS BASED ON WAGE RATE CATEGORY
Annual Affidavit of No Change (49 CFR 26.83(j))	Certified DBE and ACDBE firms	45,525 (41,800 DBEs and 3,725 ACDBEs)	Once per year	2 hours	91,050 hours	DOT contacted five consultants who are familiar with what this collection instrument involves. Only one responded.	There is no applicable wage rate because different consultants charge different amounts. There is no industry standard for how much DBE program consultants charge their clients. Further, it is very plausible that many certified firms do not hire a consultant to perform this task and will use their own employees to do it. Well established protocol prevents recipients or DOT to directly contact firms and obtain estimates.
Personal Net Worth Form (49 CFR 26.67)	Firms applying for DBE or ACDBE certification	9,500 applicants each year	Once during initial DBE or ACDBE application submission	10 hours	95,000 hours	Based on experience with adjudicating appeals in which issues of personal net worth are the	There is no applicable wage rate because there is no standardized way in which firms operate and how they pay their employees. It is not possible for DOT to

						focus, the Department believes that completing and submitting this form would require no more than 10 hours.	contact applicant firms for estimates because of well-established DOT protocol and potential ethical boundaries.
COLLECTION INSTRUMENT	AFFECTED PUBLIC	NUMBER OF RESPONDENTS	FREQUENCY OF REPOSE	ESTIMATED AVERAGE ANNUALIZED HOURS BURDEN PER RESPONSE	ESTIMATED TOTAL ANNUALIZED HOURS BURDEN	ANNUALIZED HOURS BURDEN ESTIMATE SOURCE	ESTIMATED ANNUALIZED COST FOR RESPONDENTS BASED ON WAGE RATE CATEGORY
Percentages of DBEs in Various Categories (49 CFR 26.11)	State Departments of Transportation	52 (50 states plus the District of Columbia and Puerto Rico)	Once per year	315 hours	16,380 hours	DOT contacted six State Departments of Transportations and asked them to provide estimates. There was vast variance in the estimates they provided, ranging from three hours to 915 hours for their annual hours burden estimates. The average of their estimates is 315.	\$569,532
Aggregate annualized hours burden for all five collection instruments: 962,196 hours							

13. Estimate of the total annual costs burden. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the costs of any hour burden shown in items 12 and 14).

-The cost estimates should be split into two components: (A) a total capital and start-up cost component (annualized over its expected useful life); and (B) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rates(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

-If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

-Generally, estimates should not include purchases of equipment or services, or portions thereof, made (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

The instruments described in this supporting statement do not require any respondents to obtain any equipment or services beyond what is part of their customary and usual business or private practices. Information about capital and start-up costs and operation and maintenance and purchase of services is not available, as costs to recipients and firms are not broken out in any way that allows the Department to identify costs specific to each instrument.

14. Estimates of costs to the Federal Government. Provide estimates of annualized cost to the federal government. Also, provide a description of the method used to estimate costs, which should include quantification of hours, operational expenses such as equipment, overhead, printing, and support staff, and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from items 12, 13, and 14 in a single table.

COLLECTION INSTRUMENT	RESOURCE	PAY GRADE (WASHINGTON, DC)	ESTIMATED TIME TO REVIEW EACH RESPONSE	ESTIMATED ANNUALIZED HOURS BURDEN	ESTIMATED ANNUALIZED COST BURDEN
Uniform Report of DBE Awards/Commitments (49 CFR 26.11)	Equal Opportunity Specialist	GS 11 step 5 (\$39.51/hour)	One hour	1,800 hours	\$71,118
Percentages of DBEs in Various Categories (49 CFR 26.11)	Equal Opportunity Specialist	GS 11 step 5 (\$39.51/hour)	.5 hour	26 hours	\$1,027.26

The Uniform Certification Application, Personal Net Worth Form, and Annual Affidavit of No Change do not have costs to the federal government because the federal government does not receive, review, or retain them. Applicant and certified firms submit the forms to their local recipient, i.e., local certifying agency. Neither firms nor certifying agencies provide copies to the federal government.

15. Explanation of the program change or adjustments. Explain the reasons for any program changes or adjustments reported in items 13 or 14.

The adjustment to the total burden hours mentioned in this supporting statement results from an increase in the number of applicant and certified firms each year, which in turn increases the hours and cost burdens. As stated in this collection, these firms must submit an annual affidavit and the burden hours reflected account for this increase. When this collection was submitted for renewal in 2018, the estimate for federal review of the “Uniform Report of DBE Awards or Commitments and Payments” was based on the reports being reviewed by a GS-13 step 5 in Washington, DC. However, upon reevaluation of current staffing and other resources, DOT adjusted the estimates based on the cost of a GS-11 step 5 in Washington, DC to review the reports.

16. Publication of results of data collection. For collections of information whose results will be published, outline plans for tabulation, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Not applicable.

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

Not applicable.

18. Exceptions to the certification statement. Explain each exception to the certification statement “Certification for Paperwork Reduction Act Submissions.”

There are no such exceptions.