

DEPARTMENT OF TRANSPORTATION

INFORMATION COLLECTION SUPPORTING STATEMENT

Agency Request for **Renewal and Revision of Previously Approved** Information Collection of Information Associated with the Aviation Manufacturing Jobs Protection (AMJP) program (**Part of the American Rescue Plan Act of 2021**)

OMB Control #2106-0048

INTRODUCTION

This is to request the Office of Management and Budget's (OMB) renewal and revision of previously approved information collection required in support of the Aviation Manufacturing Jobs Protection (AMJP) program, which is required as part of the "American Rescue Plan Act of 2021" (ARPA), Public Law (P.L.) 117-2, enacted on March 11, 2021.

Part A. Justification

1. Circumstances that make the collection of information necessary.

On March 11, 2021, ARPA was enacted. The ARPA included subtitle B of title VII, establishing the "Aviation Manufacturing Jobs Protection" (AMJP) program. The stated purpose of the program is "to provide public contributions to supplement compensation of an eligible employee group" (which is defined in the statute), by entering into agreements with qualified business entities (outlined in Section 2), to pay up to half of the payroll costs for that group of employees for up to six months, in return for several commitments, including a commitment that the company will not involuntarily furlough or lay off employees within that group.

Business entities eligible to apply are those that either build aircraft or aircraft components, or that provide maintenance, repair and overhaul services. To receive funding, businesses must meet all of the requirements set forth in the law. Therefore, DOT must collect certain information from applicants to determine eligibility. DOT must also verify the accuracy of specific payment requests from approved applicants, in accordance with other laws and regulations governing Federal financial assistance programs, including (but not limited to) the Antideficiency Act, the Federal Funding Accountability and Transparency Act (FFATA), the Payment Integrity Information Act of 2019, and 2 CFR Part 200, among others.

All of the agreements must be established within a six-month period (i.e., from the effective date of the first agreement, DOT has only six months before all remaining agreements must be in place).

Accordingly, DOT developed an expedited process and a system that enabled businesses to apply for financial assistance under the AMJP. DOT used an online, web-based system to collect the

required information.

This program also meets the criteria of Executive Order 14002.

2. How, by whom, and for what purpose is the information to be used.

Individual companies deemed eligible for AMJP funds (referred to hereafter as “the recipient”), must enter into agreements with the DOT. These agreements require the recipient to provide information related to compensation for their designated Eligible Employee Group (EEG) during the period of the agreement with DOT. DOT will use an online, web-based system to collect the following information necessary for DOT to evaluate payment requests from program recipients:

- Recipient business name and changes to the EEG that may affect the public contribution amount (and an explanation of the reason for the change). Employee information will be protected by the employer and not include personally identifiable information (PII).
- Explanation of why a member of the EEG was replaced by a new employee and compensation comparisons between old and new EEG member(s).
- Description and justification of employment actions, such as layoffs or furloughs, within the company but which do not impact the EEG.
- In the case of an interim payment request, the company would need to provide financial data proving allowable costs incurred are greater than previous payments received, and that the cumulative amount requested would not be greater than 90% of the estimated public contribution.
- Redacted EEG payroll reports including job category, compensation level, pay frequency, and any actions affecting the size or composition of the EEG.
- See Forms: AMJP-1A.2.2, AMJP-1A.2.3, AMJP-1A.2.4, AMJP-1A.6.4, AMJP-1A.6.5, AMJP-1A.6.6, AMJP-1A.6.7 for more details.
- Recipients will be required to provide supporting documentation in sufficient detail to substantiate the actual costs, *specifically excluding* any Personally Identifiable Information (PII) for any individual employees, in support of disbursement requests.
- DOT may also ask recipient businesses to submit voluntary reports regarding demographic data associated with the workforce that is and is not included in the Eligible Employee Group. This would be voluntary on the part of the employer and based solely on data self-reported by employees, disaggregated from any Personally Identifiable Information in order to avoid any potential privacy concerns. If a statistically valid sample can be developed, then it may be possible to extrapolate for reporting and program evaluation purposes. Such information may be used to support program evaluation.

- DOT may also ask recipient businesses to identify how they first learned about the AMJP program. Such information may be useful in implementation of future financial assistance programs.

3. Extent of automated information collection.

DOT anticipates using an online, web-based system to collect all the necessary data and supporting documentation. This will reduce costs for applicants as well as eliminate the risk of hard-copy documentation getting lost, delayed, or delivered to incorrect addresses. The system will enable applicants to save their work frequently and easily upload supporting documentation.

DOT uses the GrantSolutions platform (<https://www.grantsolutions.gov>) as the online data collection and record keeping platform for the AMJP program. Applications were uploaded into GrantSolutions, communications between DOT reviewers and applicants were recorded in the system, and additional supporting documents are saved within. Therefore, the recipient companies already have established account access and are familiar with the GrantSolutions system. DOT has decided to continue using GrantSolutions to collect subsequent data required to review payment requests and authorize payments. Recipients will be expected to upload the necessary forms and supporting documentation.

4. Describe efforts to identify duplication.

By using the same data collection platform during the application and post-award phase, GrantSolutions, DOT has streamlined the reporting process for recipient companies, eliminating the need to manage and learn multiple logins and systems. This also reduces the risk of redundant disbursements or other errors. In addition, in Form AMJP-1A.6.5 (“AMJP Recipient Notification to USDOT of EEG Composition”), DOT requires the applicant to assign a unique identification number to each employee in the Eligible Employee Group, in order to streamline reconciliation efforts throughout the life-cycle of each award.

5. Efforts to minimize the burden on small businesses.

In order to help reduce the burden on recipients (and particularly on small businesses), DOT decided to make an initial disbursement shortly after award of each agreement. The initial disbursement is up to 50 percent of the award amount. This provides the recipient businesses with an immediate cash infusion, while also reducing the total number of disbursements and the cumulative paperwork required.

6. Impact of less frequent collection of information.

DOT carefully considered the impacts of shifting from monthly disbursement requests to an approach involving an initial and final disbursement and giving recipients the option to request an interim reimbursement. This results in fewer opportunities to monitor the rate at which recipients are incurring allowable costs. However, DOT is requiring periodic reports from higher-risk recipients, so that DOT can identify emerging issues or trends earlier than otherwise, and DOT has built in safeguards to minimize the risk of having to recover funds from recipients.

7. Special Circumstances.

No special circumstances apply to this collection.

8. Compliance with 5 CFR 1320.8(d).

DOT has published a notice in the Federal Register at [insert link] notifying the public of the intent to seek approval for this renewed and revised information collection.

In addition, almost immediately after enactment of ARPA on March 11, 2021, various associations representing U.S. aircraft manufacturers and repair stations began contacting DOT via letters, phone calls, and emails to provide input on every aspect of implementation of the Aviation Manufacturing Jobs Protection (AMJP) program. In one notable instance, a letter arrived bearing the logos and signatures of 12 separate associations. Likewise, letters from various Members of Congress expressed their views about the program.

The primary concern expressed by stakeholders was the urgency of implementing the AMJP program as swiftly as possible, due to the extreme financial hardships affecting the industry. DOT consistently pointed out that the Paperwork Reduction Act requirements would need to be met before beginning the application process. Particularly because the statutory provisions governing both eligibility and magnitude of financial assistance under the AMJP required data from applicant businesses that was not publicly available, the new information to be collected necessitated emergency PRA procedures be followed.

At the same time, DOT quickly determined that one key step that many prospective applicants would have to take involved registering in the System for Award Management (SAM). Accordingly, 34 days after enactment, DOT published a set of dedicated webpages on the DOT website, highlighting the most urgent information for prospective applicants, including the need to secure a DUNS number and register in SAM. DOT issued a press release on that same day, and sent copies of that press release out through the established Small Business Office distribution lists maintained by both DOT and the FAA. This gave prospective applicants two full months of advance notice to get registered in SAM while DOT continued developing the application process.

Additionally, on the same date, DOT published a *Federal Register* notice announcing its intent to request emergency approval from OMB for the new information collection.

These early steps elicited additional feedback from stakeholders. Two sets of comments were formally submitted in response to the April 14 *Federal Register* notice. However, phone calls and emails continued to come in, and DOT carefully listened to input and feedback. These contacts came from individual businesses that were interested in applying, and association representatives or consultants representing prospective applicants.

DOT seized the opportunity to talk with anyone who called and made note of all such input. This information played a key role in how DOT implemented the application process. In one notable

example, stakeholders emphasized the importance of keeping the application process as simple as possible, while also recognizing that applicants would range in size from very small family-owned businesses with fewer than 10 employees, to large, complex international corporations with more than 100,000 employees. Stakeholders also highlighted the fact that the types of documentation prepared by publicly held corporations (e.g., SEC filings, audited financial reports, etc.) would not exist for unincorporated sole proprietorships. Stakeholders also emphasized the value of integrating the required forms with the instructions, so that applicants would not have to consult multiple documents simultaneously. DOT took all of this input into consideration and designed the application process accordingly.

Likewise, some stakeholders expressed concern about the financial constraints on applicants, especially if they had to file monthly disbursement requests and then wait until DOT was able to process them. Stakeholders highlighted this could prevent some businesses from swiftly rehiring or recalling employees who had been laid off or furloughed. Accordingly, DOT decided (and announced in mid-June 2021 in the AMJP application package) that DOT would make an initial disbursement shortly after award of the AMJP agreements, of up to 50 percent of the award amount. This helps recipient businesses make swift decisions to help retain their existing workforce as well as rehiring or recalling laid-off employees.

DOT also established dedicated help lines (via both phone and email) for anyone with questions about the AMJP program and/or the application process. DOT responded to several hundreds of inquiries, ranging from general questions about purpose and eligibility for the program to details about the application process. The process of reviewing and responding to those questions gave DOT valuable insights into the types of information that prospective applicants needed and could readily provide to DOT.

DOT used those insights to develop a series of three publicly available webinars, all of which were recorded and remain available for public access on DOT's website with the accompanying presentation materials. Participants were able to submit questions through a live portal and DOT addressed as many as they could during the live program, and then addressed the remaining questions through other communication mechanisms. Additionally, DOT issued numerous large-scale distribution emails, each to more than 10,000 representatives of prospective applicants. These mass communications were triggered by urgent program clarifications or critical updates to the application process. Those email messages invariably led to further inquiries from prospective applicants, which DOT took into consideration in subsequent program implementation decisions.

9. Payment or gifts to respondents.

Not applicable.

10. Assurance of confidentiality.

DOT will protect data submitted by applicants for the AMJP program consistent with the Freedom of Information Act (FOIA) and DOT's regulations implementing the FOIA. DOT has also emphasized repeatedly (in the Federal Register notices, on the DOT website, and in the

forms that DOT has created) that applicants must not include any Personally Identifiable Information (PII) for any individual employees.

11. Justification for collection of sensitive information.

Not applicable. None of the data required for this collection meets the stated criteria as being sensitive.

As noted above, DOT may also ask recipient businesses to submit voluntary reports regarding demographic data associated with the workforce that is and is not included in the Eligible Employee Group. This would be voluntary on the part of the employer, and based solely on data self-reported by employees, disaggregated from any Personally Identifiable Information in order to avoid any potential privacy concerns.

12. Estimate of burden hours for information requested.

DOT originally estimated as many as 4,900 applications. Initially, DOT received only 384 applications. DOT then reopened the application process for another four-week period, and received another 191 applications. Those figures reflect some duplicate or replacement applications. To be conservative, DOT is rounding the figure up to 600 applications in total.¹

All of the information required to complete the application process should have been readily available to the applicant, with the exception of the internal calculations needed to define the Eligible Employee Group and the associated compensation costs. DOT originally estimated that the application process itself could require up to 9 hours, plus 1 hour to assemble the necessary documentation to support eligibility criteria, plus 2 hours to complete the online application process. That equated to a total of 12 hours. Based on anecdotal observations and the nature of questions received, DOT has now increased that estimate to 16 hours.

Initial Application			
Budget Analyst	9.00 hours @	\$36.80 per hour =	\$331.20
Human Resource Specialist	5.00 hours @	\$29.77 per hour =	\$148.85
Staff Lawyer	2.00 hours @	\$59.11 per hour =	\$118.22
Cost to prepare initial application	16.00 hours		\$598.27
Multiplied by 600 applications	9,600 hours		\$358,962.00

In addition to the application submission, DOT originally estimated it could take up to 2 hours to prepare each disbursement request, and that there could be as many as 6 disbursement requests (once monthly for the maximum 6-month duration of each agreement). DOT subsequently decided to make an initial disbursement of up to 50 percent of the award amount, and a final disbursement, and to give recipients the option to request an interim disbursement. Accordingly,

¹ DOT published the 60-day renewal notice on September 21, 2021. At that time, DOT believed that the application process had been concluded. Therefore, DOT no longer included figures associated with the AMJP application process (which DOT had included in the original request for emergency approval published on April 14, 2021). DOT subsequently reopened the application process for a third and final round, with an application deadline of December 13, 2021. If another 150 applicants apply, then this would represent an additional burden of 2,400 hours at an estimated cost of \$89,740.50.

DOT increased the estimated workload for the interim and final disbursements, but reduced the number of disbursements to just two (2) for which the recipient has to take any action:

Disbursement Requests			
Budget Analyst	2.00 hours @	\$36.80 per hour =	\$73.60
Human Resource Specialist	2.00 hours @	\$29.77 per hour =	\$59.54
Staff Lawyer	0.00 hours @	\$59.11 per hour =	\$0.00
Cost to prepare disbursement requests	4.00 hours		\$133.14
Disbursement Requests per applicant*	2		
Total Disbursement Requests	1,200		
Totals	4,800 hours		\$159,768.00 **

* This calculation assumes that all recipients will request an Interim Disbursement. Even though it is optional, DOT is assuming 100% in order to be conservative in its burden calculations.

** Note that these burden calculations do not include completing the required forms to accompany the disbursement requests. Those burdens are presented separately. See Form AMJP-1A.6.4 (“AMJP Recipient Request for Interim Payment”) and Form AMJP-1A.6.7 (“AMJP Recipient Final Financial Report”).

In addition to the application and disbursement requests, and consistent with the original notice, DOT has established additional reporting requirements during the period of performance, including:

- Form AMJP-1A.2.2 (“AMJP Recipient Report to USDOT of Employment Action Affecting the Eligible Employee Group”)
- Form AMJP-1A.2.3 (“AMJP Recipient Report to USDOT of Replacement in the Eligible Employee Group”)
- Form AMJP-1A.2.4 (“AMJP Recipient Report to USDOT of employment action not affecting the Eligible Employee Group”)
- Form AMJP-1A.6.4 (“AMJP Recipient Request for Interim Payment”)
- Form AMJP-1A.6.5 (“AMJP Recipient Notification to USDOT of EEG Composition”)
- Form AMJP-1A.6.6 (“AMJP Recipient Interim Financial Report”)
- Form AMJP-1A.6.7 (“AMJP Recipient Final Financial Report”)

The assumptions and resulting burden calculations for each of these forms is addressed below:

Form AMJP-1A.2.2			
(“AMJP Recipient Report to USDOT of Employment Action Affecting the Eligible Employee Group”)			
Budget Analyst	0.50 hours @	\$36.80 per hour =	\$18.40
Human Resource Specialist	0.50 hours @	\$29.77 per hour =	\$14.89
Staff Lawyer	0.50 hours @	\$59.11 per hour =	\$29.56
Cost to prepare Form AMJP-1A.2.2	1.50 hours		\$62.85
Assumed % of recipients needing to file	50%		
Applicants filing forms	300		
Assumed number of forms per applicant	2		
Total forms prepared	600		
Totals	900 hours		\$37,710.00

Form AMJP-1A.2.3			
("AMJP Recipient Report to USDOT of Replacement in the Eligible Employee Group")			
Budget Analyst	0.50 hours @	\$36.80 per hour =	\$18.40
Human Resource Specialist	1.00 hours @	\$29.77 per hour =	\$29.77
Staff Lawyer	0.50 hours @	\$59.11 per hour =	\$29.56
Cost to prepare Form AMJP-1A.2.3	2.00 hours		\$77.73
Assumed % of recipients needing to file	50%		
Applicants filing forms	300		
Assumed number of forms per applicant	2		
Total forms prepared	600		
Totals	1,200 hours		\$46,638.00

Form AMJP-1A.2.4			
("AMJP Recipient Report to USDOT of employment action not affecting the Eligible Employee Group")			
Budget Analyst	0.00 hours @	\$36.80 per hour =	\$0.00
Human Resource Specialist	1.00 hours @	\$29.77 per hour =	\$29.77
Staff Lawyer	1.00 hours @	\$59.11 per hour =	\$59.11
Cost to prepare Form AMJP-1A.2.4	2.00 hours		\$88.88
Assumed % of recipients needing to file	20%		
Applicants filing forms	120		
Assumed number of forms per applicant	1		
Total forms prepared	120		
Totals	240 hours		\$10,665.60

Form AMJP-1A.6.4			
("AMJP Recipient Request for Interim Payment")			
Budget Analyst	1.00 hours @	\$36.80 per hour =	\$36.80
Human Resource Specialist	1.00 hours @	\$29.77 per hour =	\$29.77
Staff Lawyer	0.50 hours @	\$59.11 per hour =	\$29.56
Cost to prepare Form AMJP-1A.6.4	2.50 hours		\$96.13
Assumed % of recipients needing to file	100%		
Applicants filing forms	600		
Assumed number of forms per applicant	1		
Total forms prepared	600		
Totals	1,500 hours		\$57,678.00

Form AMJP-1A.6.5			
("AMJP Recipient Notification to USDOT of EEG Composition")			
Budget Analyst	0.50 hours @	\$36.80 per hour =	\$18.40
Human Resource Specialist	1.00 hours @	\$29.77 per hour =	\$29.77
Staff Lawyer	0.50 hours @	\$59.11 per hour =	\$29.56
Cost to prepare Form AMJP-1A.6.5	2.00 hours		\$77.73
Assumed % of recipients needing to file	100%		
Applicants filing forms	600		
Assumed number of forms per applicant	3		
Total forms prepared	1,800		
Totals	3,600 hours		\$139,914.00

Form AMJP-1A.6.6			
("AMJP Recipient Interim Financial Report")			
Budget Analyst	1.00 hours @	\$36.80 per hour =	\$36.80
Human Resource Specialist	0.50 hours @	\$29.77 per hour =	\$14.89
Staff Lawyer	0.00 hours @	\$59.11 per hour =	\$0.00
Cost to prepare Form AMJP-1A.6.6	1.50 hours		\$51.69
Assumed % of recipients needing to file*	35%		
Applicants filing forms	210		
Assumed number of forms per applicant**	13		
Total forms prepared	2,730		
Totals	4,095 hours		\$141,113.70

* At this time, out of the initial 313 recipients, DOT has identified about 100 applicants (roughly 32 percent) for this increased-frequency reporting. To be conservative, DOT is increasing that assumption to 35 percent and applying it to the higher total applicant figure.

** This assumes biweekly pay periods. Some recipients may pay their employees either more or less frequently, so it is reasonable to assume biweekly as an average. Typically there are 26 biweekly pay periods in a 52-week year. Because the AMJP Period of Performance is limited to six months, this calculation divides 26 by 2 to get 13.

Form AMJP-1A.6.7			
("AMJP Recipient Final Financial Report")			
Budget Analyst	1.00 hours @	\$36.80 per hour =	\$36.80
Human Resource Specialist	1.00 hours @	\$29.77 per hour =	\$29.77
Staff Lawyer	0.50 hours @	\$59.11 per hour =	\$29.56
Cost to prepare Form AMJP-1A.6.7	2.50 hours		\$96.13
Assumed % of recipients needing to file	100%		
Applicants filing forms	600		
Assumed number of forms per applicant	1		
Total forms prepared	600		
Totals	1,500 hours		\$57,678.00

DOT estimates it could take up to 4 hours to prepare the final closeout documentation:

Closeout Reports			
Budget Analyst	2.00 hours @	\$36.80 per hour =	\$73.60
Human Resource Specialist	2.00 hours @	\$29.77 per hour =	\$59.54
Staff Lawyer	0.00 hours @	\$59.11 per hour =	\$0.00
Cost to prepare closeout reports*	4.00 hours		\$133.14
Multiplied by 600 applications*	2,400 hours		\$79,884.00

* This is for supporting documentation, in addition to what's shown immediately above for Form AMJP-1A.6.7 ("AMJP Recipient Final Financial Report"). The combined hours for these two related tasks is 3,900 hours, and the combined cost is \$137,562.

In addition, DOT may ask recipients to submit a voluntary form (either SF-100 or a facsimile thereof), providing demographic data, based solely on data self-reported by employees. DOT may also ask recipients to identify how they first heard about the AMJP program.

Form SF-100 or comparable			
(Voluntary Demographic Data and Associated Information)			
Budget Analyst	0.00 hours @	\$36.80 per hour =	\$0.00
Human Resource Specialist	1.50 hours @	\$29.77 per hour =	\$44.66
Staff Lawyer	0.50 hours @	\$59.11 per hour =	\$29.56
Cost to prepare Form SF-100 or comparable	2.00 hours		\$74.22
Assumed % of recipients electing to submit	75%		
Applicants filing forms	450		
Assumed number of forms per applicant	1		
Total forms prepared	450		
Totals	900 hours		\$33,399.00

Therefore, the total estimated burden hours and costs would be:

Total Burdens on Applicants	Hours each*	Total hours*	Estimated burden
Initial Application**	16.00	9,600	\$358,962.00
Disbursement Requests	4.00	4,800	\$159,768.00
Forms			
Form AMJP-1A.2.2	1.50	900	\$37,710.00
Form AMJP-1A.2.3	2.00	1,200	\$46,638.00
Form AMJP-1A.2.4	2.00	240	\$10,665.60
Form AMJP-1A.6.4	2.50	1,500	\$57,678.00
Form AMJP-1A.6.5	2.00	3,600	\$139,914.00
Form AMJP-1A.6.6	1.50	4,095	\$141,113.70
Form AMJP-1A.6.7	2.50	1,500	\$57,678.00
Form SF-100 or comparable	2.00	900	\$33,399.00
Subtotal - Forms	16.00	13,935	\$524,796.30
Closeout Reports	4.00	2,400	\$79,884.00
Totals	40.00	30,735	\$1,123,410.30

* These figures reflect the hours per action or form. In some cases, these figures cannot be added together because the associated action or form is not required of all applicants -- or, in some cases, there may be multiple actions or forms.

** When DOT published the 60-day notice on September 21, 2021, DOT believed that the application process had been concluded, and therefore no longer included figures associated with the application process. DOT subsequently reopened the application process for a third and final round, with an application deadline of December 13, 2021. These calculations are based on the full burden assuming 600 applicants in total.

13. Estimate of the total annual costs burden.

Estimated labor costs for applicants are included in Section 12. There should be no other cost to applicants because they should already have all of the information needed, and there should be no additional costs required.

14. Estimates of costs to the Federal Government.

DOT plans to use a combination of Federal and contract personnel to review applications and process subsequent disbursement requests.

Initial Application			
Contractor	2.50 hours @	\$125.00 per hour =	\$312.50
DOT Financial Analyst	0.50 hours @	\$120.00 per hour =	\$60.00
Cost to review initial application	3.00 hours		\$372.50
Multiplied by 600 applications	1,800 hours		\$223,500.00

As noted above, DOT originally anticipated monthly disbursement requests (one per applicant for each month of the maximum 6-month duration of the agreements), but subsequently revised that to an initial disbursement, an interim disbursement, and final disbursement. The initial disbursement is a simple calculation across all recipients—50 percent of the award amount. Therefore, only the interim and final disbursement drive any significant workload for the government or its support contractor:

Disbursement Requests			
Contractor	1.00 hours @	\$125.00 per hour =	\$125.00
DOT Financial Analyst	0.25 hours @	\$120.00 per hour =	\$30.00
Cost to review disbursement requests	1.25 hours		\$155.00
Disbursement Requests per applicant	2		
Total Disbursement Requests	1,200		
Totals	1,500 hours		\$186,000.00

DOT will rely upon a combination of contractor and Federal personnel to review the forms. The assumptions and resulting cost calculations for each of these forms is addressed below:

Form AMJP-1A.2.2			
("AMJP Recipient Report to USDOT of Employment Action Affecting the Eligible Employee Group")			
Contractor	0.50 hours @	\$125.00 per hour =	\$62.50
DOT Financial Analyst	0.25 hours @	\$120.00 per hour =	\$30.00
Cost to review Form AMJP-1A.2.2	0.75 hours		\$92.50
Assumed % of recipients needing to file	50%		
Applicants filing forms	300		
Assumed number of forms per applicant	2		
Total forms reviewed	600		
Totals	450 hours		\$55,500.00

Form AMJP-1A.2.3			
("AMJP Recipient Report to USDOT of Replacement in the Eligible Employee Group")			
Contractor	1.00 hours @	\$125.00 per hour =	\$125.00
DOT Financial Analyst	0.25 hours @	\$120.00 per hour =	\$30.00
Cost to review Form AMJP-1A.2.3	1.25 hours		\$155.00
Assumed % of recipients needing to file	50%		
Applicants filing forms	300		
Assumed number of forms per applicant	2		
Total forms reviewed	600		
Totals	750 hours		\$93,000.00

Form AMJP-1A.2.4			
("AMJP Recipient Report to USDOT of employment action not affecting the Eligible Employee Group")			
Contractor		0.50 hours @ \$125.00 per hour =	\$62.50
DOT Financial Analyst		0.50 hours @ \$120.00 per hour =	\$60.00
Cost to review Form AMJP-1A.2.4		1.00 hours	\$122.50
Assumed % of recipients needing to file		20%	
Applicants filing forms	▶	120	
Assumed number of forms per applicant		1	
Total forms reviewed		120	
Totals		120 hours	\$14,700.00

Form AMJP-1A.6.4			
("AMJP Recipient Request for Interim Payment")			
Contractor		2.00 hours @ \$125.00 per hour =	\$250.00
DOT Financial Analyst		0.50 hours @ \$120.00 per hour =	\$60.00
Cost to review Form AMJP-1A.6.4		2.50 hours	\$310.00
Assumed % of recipients needing to file		100%	
Applicants filing forms	▶	600	
Assumed number of forms per applicant		1	
Total forms reviewed		600	
Totals		1,500 hours	\$186,000.00

Form AMJP-1A.6.5			
("AMJP Recipient Notification to USDOT of EEG Composition")			
Contractor		1.50 hours @ \$125.00 per hour =	\$187.50
DOT Financial Analyst		0.50 hours @ \$120.00 per hour =	\$60.00
Cost to review Form AMJP-1A.6.5		2.00 hours	\$247.50
Assumed % of recipients needing to file		100%	
Applicants filing forms	▶	600	
Assumed number of forms per applicant		3	
Total forms reviewed		1,800	
Totals		3,600 hours	\$445,500.00

Form AMJP-1A.6.6			
("AMJP Recipient Interim Financial Report")			
Contractor		1.00 hours @ \$125.00 per hour =	\$125.00
DOT Financial Analyst		0.25 hours @ \$120.00 per hour =	\$30.00
Cost to review Form AMJP-1A.6.6		1.25 hours	\$155.00
Assumed % of recipients needing to file		35%	
Applicants filing forms	▶	210	
Assumed number of forms per applicant		13	
Total forms reviewed		2,730	
Totals		3,413 hours	\$423,150.00

Form AMJP-1A.6.7			
("AMJP Recipient Final Financial Report")			
Contractor	2.50 hours @	\$125.00 per hour =	\$312.50
DOT Financial Analyst	0.50 hours @	\$120.00 per hour =	\$60.00
Cost to review Form AMJP-1A.6.7	3.00 hours		\$372.50
Assumed % of recipients needing to file	100%		
Applicants filing forms	600		
Assumed number of forms per applicant	1		
Total forms reviewed	600		
Totals	1,800 hours		\$223,500.00

If DOT asks recipients to submit a voluntary form (either SF-100 or a facsimile thereof), providing demographic data, then DOT will review and compile the resulting data, with the following estimated costs:

Form SF-100 or comparable			
(Voluntary Demographic Data and Associated Information)			
Contractor	0.50 hours @	\$125.00 per hour =	\$62.50
DOT Financial Analyst	0.25 hours @	\$120.00 per hour =	\$30.00
Cost to review Form SF-100 or comparable	0.75 hours		\$92.50
Assumed % of recipients electing to submit	75%		
Applicants filing forms	450		
Assumed number of forms per applicant	1		
Total forms reviewed	450		
Totals	338 hours		\$41,625.00

Finally, DOT anticipates requiring a simple closeout process for each agreement:

Closeout Reports			
Contractor	1.50 hours @	\$125.00 per hour =	\$187.50
DOT Financial Analyst	0.25 hours @	\$120.00 per hour =	\$30.00
Cost to review closeout reports	1.75 hours		\$217.50
Multiplied by 600 applications	1,050 hours		\$130,500.00

* This is to review supporting documentation, in addition to what's shown immediately above for Form AMJP-1A.6.7 ("AMJP Recipient Final Financial Report"). The combined hours for these two related tasks is 2,850 hours, and the combined cost is \$354,000.

In summary:

Total Costs to Government	Hours each*	Total hours	Estimated burden
Initial Application**	3.00	1,800	\$223,500.00
Disbursement Requests	1.25	1,500	\$186,000.00
Required Forms			
Form AMJP-1A.2.2	0.75	450	\$55,500.00
Form AMJP-1A.2.3	1.25	750	\$93,000.00
Form AMJP-1A.2.4	1.00	120	\$14,700.00
Form AMJP-1A.6.4	2.50	1,500	\$186,000.00
Form AMJP-1A.6.5	2.00	3,600	\$445,500.00
Form AMJP-1A.6.6	1.25	3,413	\$423,150.00
Form AMJP-1A.6.7	3.00	1,800	\$223,500.00
Subtotal - Required Forms	11.75	11,633	\$1,441,350.00
Voluntary Form SF-100 or comparable	0.75	338	\$41,625.00
Closeout Reports	1.75	1,050	\$130,500.00
Totals	18.50	16,320	\$2,022,975.00

* These figures reflect the hours per action or form. In some cases, these figures cannot be added together because the associated action or form is not required of all applicants -- or, in some cases, there may be multiple actions or forms.

** When DOT published the 60-day notice on September 21, 2021, DOT believed that the application process had been concluded, and therefore no longer included figures associated with the application process. DOT subsequently reopened the application process for a third and final round, with an application deadline of December 13, 2021. These calculations are based on the full burden assuming 600 applicants in total.

In addition, DOT incurred initial costs to acquire and configure the web-based tools that will be used to manage the entire application, evaluation, award, disbursement and documentation process. DOT does not yet have a complete estimate for this cost, but it is very likely that between internal labor, contract support, and acquisition, configuration and operation of the existing GrantSolutions system for this purpose, DOT may need to use the full amount allowed for in the statute (up to 1% of the \$3 billion appropriated, or \$30 million overall).

15. Explanation of the program change or adjustments.

Not applicable—this is a new program.

16. Publication of results of data collection.

DOT anticipates publishing the list of approved applications including the maximum eligible amounts, the estimated amounts to be paid (reflecting any pro-rata reduction if necessary), and actual disbursements as soon as practicable after the data has been verified.

17. Approval for not displaying the expiration date of OMB approval.

Not applicable. DOT is not seeking approval to not display the expiration date for OMB approval of the information collection.

18. Exceptions to the certification statement.

No exceptions stated.