

**U.S. Department of Transportation
Federal Transit Administration (FTA)
Supporting Statement for Paperwork Reduction Act Submissions
Public Transportation Safety Certification Training Program
OMB CONTROL NO. 2132-0578**

JUSTIFICATION

This supporting statement is associated with a request for an extension without change of a currently approved information collection (OMB# 2132-0578) “Public Transportation Safety Certification Training Program (PTSCTP)”. There have been no programmatic or statutory changes or requirements since the last OMB submission. This information collection request (ICR) is due to expire on June 30, 2022. PTSCTP provides minimum training requirements for Federal and State personnel and contractors who conduct safety audits and examinations of transit systems and for transit agency personnel and contractors who are directly responsible for safety oversight to enhance the technical proficiency.

1. Circumstances Making the Collection of Information Necessary

The PTSCTP is authorized pursuant to 49 U.S.C. § 5329(c)(1) and provides minimum training requirements for Federal and State personnel and contractors who conduct safety audits and examinations of transit systems and for transit agency personnel and contractors who are directly responsible for safety oversight to enhance the technical proficiency.

The PTSCTP has different Individual Training Plan (ITP) tracks. The different ITP tracks are stated below:

- 1) **State Safety Oversight (SSO)** - State personnel and their contractor support who conduct safety audits and examinations of public transportation systems;
- 2) **Rail Transit Agency (RTA)** – Rail transit agency personnel who are directly responsible for public transportation system safety oversight,

All are recipients of FTA grant funding and compliance a grant condition.

FTA personnel and contractors who conduct safety audits and examinations of rail public transportation systems will adhere to applicable State Safety Oversight Agencies (SSOAs) training requirements. PTSCTP prescribes minimum training requirements for SSOAs personnel and contractors who conduct safety audits and examinations of public transportation systems. The program also provides minimum training requirements for RTA personnel who are directly responsible for safety oversight of public transportation systems. To comply with 49 U.S.C. § 5329(c)(1), designated personnel are required to register for the PTSCTP and request an individual training plan (ITP) at: [Safety Training | FTA \(dot.gov\)](https://www.fta.dot.gov/safety-training). FTA then issues an ITP with a curriculum associated with his or her job category. That is either conducting safety audits and examinations, or directly responsible for safety oversight of a public transportation system. Following registration, participants enroll in courses specific to their curriculum. In those

circumstances where a participant has already completed training that may be equivalent to a PTSCTP requirement from an entity other than FTA, the participant may request that FTA evaluate the training. The evaluation request is affected by submitting the following to FTA: an official transcript or certificate of the training; a description of the curriculum and competencies obtained; and a brief statement detailing how the training or certification satisfies the applicable PTSCTP requirement. If FTA determines the training satisfies a PTSCTP requirement, the participant is provided appropriate credit and waived from having to repeat the training. Recipients are required to self-certify compliance with 49 CFR part 672 annually. Additionally, SSOAs are required to maintain training records for its designated personnel for a five-year period.

2. 11Purpose and Use of the Information

It is necessary for FTA to collect information for this program to ensure that SSOA and RTA are complying with the prescribed training requirements by ensuring their designated personnel are receiving training that assist with enhancing technical and professional proficiency in performing safety oversight functions. FTA will use the information collected to monitor implementation of the PTSCTP. Certain information collected may be disseminated to recipients or FTA program managers to encourage and ensure participation by designated personnel is achieved within the prescribed 3-year certification period. FTA will disseminate any information associated with the PTSCTP to the general public.

3. Use of Information Technology and Burden Reduction

FTA requires transit agencies and States to submit annual certifications and assurances to FTA to ensure compliance with this program. Transit agencies and States may generate and use any processes desired, but submissions and compliance would not require information technology that is more complex than a word processing or spreadsheet file.

FTA uses information technology, particularly electronic record keeping for PTSCTP registration. In compliance with both the requirements of the Paperwork Reduction Act and Government Paperwork Elimination Act (GPEA), FTA utilizes 100% electronic entry and participation in the PTSCTP. Initial information will be collected on a one-time basis as participants register for the program. All participants will utilize FTA's electronic registration process to request an ITP and register for required coursework. Additionally, participants will be able to correspond with FTA via electronic mail when requesting evaluation of such training. Data and information collected will be entered, stored, transmitted, and circulated electronically, both internal to the agency and in external communications from FTA to recipients. If technical assistance is warranted, FTA may provide support through either electronic or telephonic forms of technology. FTA's Transit Awards Management System (TrAMS) will be used by RTAs and SSOAs to submit electronic certification and assurances that they are compliance in accordance with established policies and procedures. TrAMS is already in use by all of FTA grantees, so there is no additional burden associated with the use of this system.

4. Efforts to Identify Duplication and Use of Similar Information

Congress authorized the PTSCTP to enhance the technical and professional competencies of those charged with safety oversight responsibilities for public transportation systems. The PTSCTP implements federal training requirements mandated by Congress and there is no duplication of effort for participants. The information requested is unique to each participant and is not available from any other source. FTA coordinated its efforts during the rulemaking process in 2019 to ensure that required participants for each rule are not burdened with the same requirements twice. FTA has numerous programs/information collections related to safety oversight and in some cases have some overlap for required participants. However, tasks associated with each information collection have been designated in the appropriate information collection previously and are not duplicated with this request. Specifically, the information collection for the Rail Fixed Guideway Systems; State Safety Oversight (OMB#2132-0558) contain training costs and burdens associated with PTSCTP requirements for SSOAs. The costs and burdens associated with this program do not include training costs and burdens already captured in the approved SSO information collection.

5. Impact on Small Businesses or Other Small Entities

The requirements of this program apply only to SSOAs and RTAs; recipients such as bus transit systems or ferry systems are not required to participate in the PTSCTP. In an effort to minimize burden on all participants, FTA will maintain electronic records of participants and make the records available to them electronically. This process will assist recipients with monitoring the progress of designated personnel and assist with their annual self-certification requirement. Additionally, FTA will continue to develop and offer e-Learning courses as part of the PTSCTP online curriculum.

6. Consequences of Collecting the Information Less Frequently

If this information were not collected or collected less frequently, FTA would be unable to fulfill the statutory requirements of 49 U.S.C. § 5329 (c)(1). FTA has limited the information collection requirements to implement the PTSCTP to those that are essential for ensuring compliance. Without the information collection requirements stated in this document, FTA would be unable to adequately determine compliance with program requirements; thus, adversely affecting the funding status of recipients. FTA considers the collection of information to be a critical element of its goal of advancing public transportation safety.

7. Special Circumstances that Require the Collection to be Conducted in a Manner Inconsistent with OMB Guidelines

There are no special circumstances that require the collection of information inconsistent with any OMB guidelines.

8. Comments in Response to the Federal Register Notices and Efforts to Consult Outside Agencies

A 60-day Federal Register notice was published on March 1, 2022, Vol. 87, No.40 (page 11507-11508), soliciting comments prior for the approval of this information collection to submission to the Office of Management and Budget (OMB). No comments were received. The 30-day Federal Register notice was published on June 23, 2022 (Vol. 87, No.120 (page 37551-37552). Both Federal Register Notices have been uploaded under the supplementary documents section of ROCIS.

In an effort to provide additional outreach to PTSCTP respondents, FTA has created an online resource library to better consult with respondents from the SSOs and RTAs [PTASP Community of Practice | FTA \(dot.gov\)](#). FTA works along with the Transportation Safety Institute (TSI) to administer training programs. TSI can verify the status of all scheduled courses and assist respondents with any other course-related questions.

9. Explanation of Any Payment or Gift to Respondents

No payment or gift is made to respondents.

10. Assurance of Confidentiality Provided to Respondents

There have been no assurances of confidentiality provided to respondents. This was unnecessary given that there will be no questions of a confidential nature for individuals on the information reported by the recipients.

11. Justification for Sensitive Questions

No individuals are asked questions of a sensitive nature in this information collection. Only RTAs and state oversight agencies will provide the information.

12. Estimates of Hour Burden Including Annualized Hourly Costs

Total Annual Respondents: 90 respondents (30 SSOAs that conduct audits and examinations of public transportation systems and 60 public RTAs with designated personnel who are directly responsible for safety oversight of their systems).

Total Annual Responses: 1020

Total Annual Burden Hours: 5,118

There are typically 90 annual respondents (SSOA's and RTA's) that provide information to FTA in relation to the PTSCTP program. The table below indicates the hours and costs estimated to be incurred on an annual basis

FTA estimates that the average salary of the respondent, typically a General and Operations Manager (occupation code 11-1021; [General and Operations Managers \(bls.gov\)](https://www.bls.gov)) has a median hourly wage of \$70.92 (hourly salary of \$55.41 weighted with a .28 percent benefits adjustment of \$15.51) according to the latest May 2021 Bureau of Labor Statistics standard occupational classification system..

The estimated time to fulfill each requirement are as follows:

Rail Transit Agency (RTA) Annual Burden Table:

CFR Section	Total Annual RTA's Respondents	Total Annual Responses	Total Annual Burden Hours	Annual Cost Burden
672.1 Purpose	0	0	0	\$0.00
672.3 Scope and Applicability	0	0	0	\$0.00
672.5 Definitions	0	0	0	\$0.00
672.13 Designated Personnel of Public Transportation Agencies - RTAs	60	60	180	\$12,766
672.15 Evaluation of prior training	60	241.5	965	\$68,438
672.21 (a) Records (all recipients)	60	60	121	\$8,581
672.23 Availability of Records	60	241.5	795	\$56,381
672.31 (all recipients)	60	60	181	\$12,836
Note: 2021 Wage Rate = \$70.92				
Total		663	2242	\$159,002

State Safety Oversight Agency (SSOA) Annual Burden Table:

CFR Section	Total Annual RTA's Respondents	Total Annual Responses	Total Annual Burden Hours	Annual Cost Burden
672.1 Purpose	0	0	0	\$0.00
672.3 Scope and Applicability	0	0	0	\$0.00
672.5 Definitions	0	0	0	\$0.00
672.11 Designated Personnel who conduct safety audits and examinations - SSOAs	30	30	60	\$4,255
672.15 Evaluation of prior training	30	119	475	\$33,687
672.21 (a) Records (all recipients)	30	29	59	\$4,184
672.21 (b) SSO requirement	30	30	1800	\$127,656
672.23 Availability of Records	30	119	392	\$27,801
672.31 (all recipients)	30	30	90	\$6,383
Note: Wage rate = \$70.92				
Total		357	2876	\$203,966

13. Estimate—Total Annual Cost Burden to Respondents/Recordkeepers

There are no additional cost beyond what is shown in question 12 above.

14. Annualized Cost to the Federal Government

We estimate the annualized cost to the Federal government to be approximately \$1,464,458 as noted in the table below.

Federal Salaries and Benefits	\$ 252,466
Contract Services	\$ 368,000
Equipment, Supplies, Space, Other	\$ 58,260
Travel (Other than Course Delivery)	\$ 13,800
Course Delivery	\$ 462,866
ADD: TSI Indirect @ 19%	\$ 211,496
Est. Materials Fee Recovery	\$ 97,570
Total	\$ 1,464,458

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

There have been no programmatic or adjustments since the last OMB submission.

16. Plans for Tabulation and Publication and Project Time Schedule

FTA does anticipate reporting on the progress of the industry in aggregate to Congress; however, FTA does not plan to publish training program data.

17. Reason(s) the Display of OMB Expiration Date is Inappropriate

There is no reason not to display the expiration date of OMB approval.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification statement.