#### Supporting Statement A Airports Grants Program OMB 2120-0569

This submission revises the total number of respondents, the number of responses, the burden and cost of the collection to respondents, and the cost to the federal government. These adjustments reflect the inclusion of Bipartisan Infrastructure Law (BIL) grant programs and a more detailed accounting of the compliance-related components of airport grant programs. To ensure the agency could distribute BIL funds as quickly and efficiently as possible, the FAA relied on many of the processes, staff, and collection instruments already in use for existing airport grant programs. The addition of the compliance-related elements ensures the burden and cost associated with this collection are more accurate. This renewal also includes additional collection instruments that were incorporated into past burden calculations but not specifically identified (e.g., standard forms) and a more complete accounting of costs to the government. In the past, we showed an average burden on many of the forms, rather than the burden associated with that particular form. To correct this, we will update the incorrect burden statements on several forms (identified in Question 15) to reflect the burden associated with that form.

## 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

Title 49, U.S.C., which is referred to as the "Act," provides funding for airport planning and development projects at airports included in the National Plan of Integrated Airport Systems (NPIAS) (see https://www.faa.gov/airports/planning\_capacity/npias/). The Act also authorizes funds for noise compatibility planning and to carry out noise compatibility programs. When Airport owners and operators accept Federal grants, deeds of conveyance, or property transfers, they agree to preserve and operate their facilities in a safe and efficient manner and comply with certain conditions, federal requirements, and assurances, including reporting obligations, for periods specified in the agreements. In 2021, the passage of the Infrastructure Investment and Jobs Act, referred to as the Bipartisan Infrastructure Law (BIL), added additional funds to be administered the FAA. To ensure the efficient distribution of these funds, the FAA administers those funds identified for airport infrastructure improvements using the same process and collection tools as the existing Airport Grant Program. (See related collection 2120-0806, Bipartisan Infrastructure Law Airport Terminal and Tower Information, which covers the data collected to make initial project selections. Once selected, grantees use the same collection instruments as do Airport Improvement Program grantees.)

The information collected in support of the Airport Grants Program is necessary to protect the Federal interest in safety, efficiency, and utility of the Airport; and to prevent fraud, wage and abuse of public funds.

## 2. 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.

Airport owners and managers (sponsors) are required to report this information on occasion to the FAA in order to receive grant funds. The collected information consists of airport demographics (runway data; lighting data; enplanement data, etc.) as well as financial and compliance information. This information is received and used by the FAA for grant awarding and monitoring purposes; and for ensuring compliance with the enabling legislation and grant assurances.

This is a mandatory reporting collection for certifications and representations, financial management and performance measurement as follows:

#### **Certifications and Representations**

The Uniform Guidance (2 CFR § 200), 49 CFR § 18 and 49 USC Chapter 471 authorize the FAA to require Sponsors to submit certain certifications and representations as required by Federal statutes or regulations. In compliance with these statutory and regulatory requirements data is collected on the following Federal Aviation Administration (FAA) forms:

FAA Form 5100-128, Agreement on State Sponsorship and Airport Sponsor Obligations – Airport Improvement Program;

FAA Form 5100-129, Construction Project Final Acceptance – Airport Improvement Program Sponsor Certification:

FAA Form 5100-130, Drug-Free Workplace – Airport Improvement Program Sponsor Certification;

FAA Form 5100-131, Equipment and Construction Contracts – Airport Improvement Sponsor Certification;

FAA Form 5100-132, Project Plans and Specifications – Airport Improvement Program Sponsor Certification;

FAA Form 5100-133, Real Property Acquisition – Airport Improvement Program Sponsor Certification:

FAA Form 5100-134, Selection of Consultants – Airport Improvement Program Sponsor Certification:

FAA Form 5100-135, Certification and Disclosure Regarding Potential Conflicts of Interest – Airport Improvement Program Sponsor Certification.

FAA Form 5100-145, Title VI Pre-Grant Award Checklist (added with this renewal)

Certification Regarding Lobbying (added with this renewal)

Standard Form 1445, Labor Standards Interview Form (added with this renewal)

The FAA uses the information collected to make funding decisions, prepare and issue grants, and ensure compliance with statutes and regulations.

Currently, the FAA receives fewer than ten submissions for the Airport Investment Partnership Program (AIPP) (see <a href="https://www.faa.gov/airports/airport\_compliance/privatization">https://www.faa.gov/airports/airport\_compliance/privatization</a>). We will include this program in the future if filings approach 10 or more annually.

#### Financial Management

The Uniform Guidance and 49 USC Chapter 471 require that recipients of Federal monies meet certain standards for financial management, performance, reporting, and audits. Financial data is used by FAA personnel and accountants to ensure that grant obligations are not exceeded and revenue is not diverted. There would be great potential for revenue diversion and fraud if financial data were not collected. The FAA uses this Information for payment processing, grant application review, compliance with Federal financial transaction protocols, budgeting, reports to Congress, and to ensure compliance with other statutory and regulatory requirements. Financial reports and requests for payment are used in the grant programs' fund control process, payment process, and accounting systems.

The FAA uses the information in fulfillment of our oversight and fiduciary responsibilities to the taxpayers. We work to ensure their funds are spent in accordance with the enabling legislation, appropriation law, FAA policy and program requirements. The reviews highlight changes in schedules and costs. Cargo activity report is used to allocate funding to cargo facilities. Development and planning

applications are used to establish a proposed grant budget. Government payment and financial summary reports are collected to provide the FAA with a means of evaluating sponsor compliance with revenue-use requirements. Buy American information is collected to ensure compliance with Buy American requirements. Transfer reports are used to ensure compliance with protocols and procedures associated with transfer of Federally-funded capital assets. Benefit cost analysis is done to help identify proposed projects that will provide a net benefit to the aviation community. The letter of intent (LOI), snow removal inventory form and cold weather early start forms are used by the FAA as financial planning and forecasting tools. Data is collected on the following FAA forms:

Standard Form 424, Application for Federal Assistance (added with this renewal) Standard Forms 425 and 425A, Federal Financial Report and Attachment (added with this renewal)

FAA Form 5100-108, All Cargo Carrier Activity Report;

FAA Form 5100-100, Application for Federal Assistance (Development);

FAA Form 5100-101, Application for Federal Assistance (Planning);

FAA Form 5100-126, Financial Government Payment report;

FAA Form 5100-127, Operating and Financial Summary;

FAA Form 5100-110, Request for FAA Approval of Agreement for Transfer of Entitlements;

FAA Form 5100-136, Buy American Content Percentage Calculation Worksheet;

FAA Form 5100-137, Buy American Preferences - Final Assembly Questionnaire;

FAA Form 5100-138, Data Requirements for an Office of Airports Automated Weather

Observation System (AWOS) Benefit Cost Analysis (BCA);

FAA Form 5100-139, LOI Application Financial Template;

FAA Form 5100-141, Inventory of Snow Removal Equipment;

FAA Form 5100-142, Sponsor Request for FAA Acknowledgment for Cold Weather Early Start;

Standard Form 270, Request for Advance or Reimbursement (added with this renewal);

Standard Form 271, Outlay Report and Request for Reimbursement for Construction Projects (added with this renewal);

U.S. Department of Labor Form 347, Contractor Payroll Form (added with this renewal);

The FAA uses financial management information to make funding decisions and to ensure compliance with statutes and regulations; and in fulfillment of our oversight and fiduciary responsibilities to the taxpayers. To ensure effective long-term planning, the FAA works with airports even before their grant requests are submitted, through the Airport Capital Improvement Plan process, to identify funding needs and projects that are of the highest priority. By submission of the forms listed above, the FAA prepares and issues grants during the fiscal year as spending levels are appropriated by Congress; amends actual dollar amounts and descriptions to reflect changes in existing grants; monitors the progress of projects and status of remaining funds in a project through financial status reports; and ensures compliance with federal laws and policies. The collected information also provides the necessary information for routine audits. Additionally, post-grant oversight is conducted through Airport Compliance Financial Reviews, Aviation Fuel Tax Action Plans, and Single-Audit Reviews.

With this renewal, we are cancelling FAA Form 5100-143, Buy American Construction Project Content Percentage Worksheet. We have consolidated this form with Forms 5100-136 and 5100-137 to ease the burden on airport sponsors and improve program management.

#### Performance Measurement

As specified in 2 CFR § 200, proper program management requires that information be collected about program performance. Sponsors are required to monitor performance on grant projects to ensure that time schedules are being met and performance goals are achieved. Data is collected on the following FAA forms, plans, and processes:

FAA Form 5370-1, Construction Progress and Inspection Report; and FAA Form 5100-140, Performance Report Construction Management Plan

The FAA uses the collected information to monitor performance of the funded projects and in fulfillment of our oversight and fiduciary responsibilities to the taxpayers to ensure their funds were spent in accordance with the enabling legislation, appropriation law, FAA policy and program requirements. The FAA also tracks grant assurance compliance through additional processes and instruments, including 14 CFR Part 16 Complaints, internal compliance database, Personal Surplus Property filings, and Airport Land Use Inspection Reports. Submitted information is reviewed by FAA personnel to determine that project performance goals have been met. If these reviews were not made, the Federal government would be vulnerable to unexpected costs overruns and time delays.

Responding to the collection is necessary to obtain a Federal award, and the responders are public-use airports. Information is received by the FAA. The collection of this information supports the DOT Safety and Climate and Sustainability priorities.

3. 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.

Approximately 90 percent of the certification and financial management data is submitted electronically. The organization has efforts under way to allow online submission of airport capital improvement planning data, grant documents, and performance reporting data, which we expect will positively affect the existing burden on airport sponsors. For the last few years, the FAA has worked on updating its grants management system to accommodate this process and internal testing continues. Full electronic processing for this collection may still be several years off because of the significant number of data elements and reporting requirements that must be incorporated and tested; however, as we move toward nearly full automation, we a team in place to identify ways to streamline the existing process and thus further reduce the overall burden to sponsors. The FAA Airports Organization has licensed third party e-signature software and began allowing digital signatures on all fillable PDF forms during the fiscal year 2020 grant program. Once the automation process is complete, we anticipate only those documents related to land grants that require notarization will not be submitted electronically.

In addition, approximately 70 percent of the information collected to monitor compliance is currently submitted electronically. We are presently revising the associated databases, including introducing more "user friendly" features and more flexible reporting capabilities, to reduce the burden on airport sponsors.

Forms related to this collection are available at <a href="https://www.faa.gov/airports/resources/forms">https://www.faa.gov/airports/resources/forms</a>. Data associated with Forms 5100-126 and 5100-127 can be submitted electronically via <a href="https://cats.airports.faa.gov/">https://cats.airports.faa.gov/</a>.

4. 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.

Other than basic identification data, the data collected from the airport sponsor is unique to the specific airport, the specific project, and specific project period and does not exist elsewhere. Information sharing exists within our internal grant and compliance databases to prevent duplication when multiple

offices within the FAA have need of the same data.

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

Some airports applying for Federal grant funds are small entities. However, FAA staff in Regional and Airport District Offices have a long history of working closely with airports, including small entities, to provide any support and assistance needed to help them meet the information requirements of this collection. Further, as we move toward full electronic submission of data, we are building in efficiencies to ease the collection process as much as possible.

# 6. 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.

Annual reporting is required by Section 47107(a) of the Title 49 U.S.C.; failure to collect the information will result in non-compliance with the statute. It would also prevent the FAA from making funding decisions based on accurate, complete and current financial data and other information. Any less frequent reporting would not provide adequate financial or programmatic oversight in order to monitor and detour revenue diversions.

### 7. 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 secrets, 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.

Three special circumstances exist:

- U.S. Department of Labor Form 347, Contractor Payroll Form, is submitted on a weekly basis per Department of Labor requirements.
- Per 14 CFR Part 16, respondents to Part 16 complaints have 20 days to respond to complaints.
- Per 14 CFR Part 16, complainants must file the original and three copies of their complaint with the FAA.
- 8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those

comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A Federal Register Notice published on January 5, 2023 (88 FR 900), solicited public comment. No comments were received.

FAA staff engage in outreach with the airport community throughout the year to discuss the grant process and development needs. This includes individual meetings with airports and airport staff as well as presentations to regional and state aviation meetings and conferences attended by airports, consultants, and airport industry groups. Through this outreach, staff are continually collecting comments on the process and ways to both streamline it and reduce the burden to airports. Further, we provide contact information for our collection instruments so grantees can recommend improvements, which we consider when we update these tools.

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

No payments or gifts are provided to respondents.

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

No assurance of confidentiality is given to respondents.

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

There are no questions of a sensitive nature.

### 12. Provide estimates of the hour burden of the collection of information. The statement should:

Burden estimates were developed from anecdotal data provided by users of the various forms. Specific reporting requirements are shown in the narratives and tables below. The labor hour burden is estimated on an annual basis. Respondent numbers below have been increased to include the expected annual submissions for Bipartisan Infrastructure Law (BIL) grants, which follow many of the same processes and use the same tools used for Airport Improvement Program grants.

Sponsors of public use airports or public agencies are required to document aspects of project planning design, acquisition, construction and closeout; including technical equipment determinations, and compliance with federal requirements, such as the Drug-Free Workplace Act.

<u>Certifications and Representations:</u> Form 5100-128, 5100-129, 5100-130, 5100-131, 5100-132, 5100-133, 5100-134, 5100-135, 5100-145, Certification Regarding Lobbying, SF 1445, other filings

Summary (Annual Numbers)	Reporting	Recordkeeping
# of Respondents	1,950	

# of Responses per respondent	1	
Hours per Response	10	
Total # of responses	1,950	
Total burden (hours)	19,500	

Approximately 90 percent of airports in the NPIAS (Approximately 3,000) provide airport capital improvement planning (ACIP) information to the FAA each year to make long-term planning more efficient.

Financial Management: ACIP data

Summary (Annual Numbers)	Reporting	Recordkeeping
# of Respondents	3,000	
# of Responses per respondent	1	
Hours per Response	8	
Total # of responses	3,000	
Total burden (hours)	24,000	

Sponsors of public use airports or public agencies may submit pre-applications and/or applications for one or more projects in a form prescribed by the Secretary of the Department of Transportation (Pre-applications are not required by FAA, though some sponsors choose to submit them). The ACIP and application must contain a list of projects for programming, airport layout sketches, a description of relocation cost, plans, and assurances, a statement describing clearing procedures and public hearings, environmental assessments, property descriptions, plans and specifications for projects, civil rights, and other assurances. FAA Forms 5100-100 and 5100-101 and Standard Form 424 are used for this purpose.

Financial Management: Forms 5100-100, 5100-101, SF 424

Summary (Annual Numbers)	Reporting	Recordkeeping
# of Respondents	2,454	
# of Responses per respondent	1	
Hours per Response	30	
Total # of responses	2,454	
Total burden (hours)	73,620	

The available funds are apportioned to sponsors of airports, which are served by aircraft providing scheduled and nonscheduled service of property only with an aggregate annual landed weight in excess of 100,000 pounds. FAA Form 5100-108 is used annually for this purpose.

Financial Management: Form 5100-108

Summary (Annual Numbers)	Reporting	Recordkeeping
# of Respondents	150	
# of Responses per respondent	1	
Hours per Response	0.5	
Total # of responses	150	
Total burden (hours)	75	

Sponsors of public use airports or public agencies are required to document aspects of project design, implementation, and closeout, including technical equipment determinations, and compliance with federal requirements.

Financial Management: 5100-110, 5100-138, 5100-139, 5100-141, 5100-142, DOL 347

Summary (Annual Numbers)	Reporting	Recordkeeping
# of Respondents	1,950	
# of Responses per respondent	1	
Hours per Response	8	
Total # of responses	1,950	
Total burden (hours)	15,600	

Sponsors of public use airports or public agencies must follow Buy American requirements for steel and manufactured goods used in Airport Improvement Program (AIP) funded projects. If certain market or product conditions exist, they can requests waivers to these requirements using FAA Forms 5100-136 and 5100-137.

Financial Management: 5100-136, 5100-137

Summary (Annual Numbers)	Reporting	Recordkeeping
# of Respondents	2,000	
# of Responses per respondent	1	
Hours per Response	1	
Total # of responses	2,000	
Total burden (hours)	2,000	

Section 47107(a)(19) of Title 49 requires airport owners and operators to submit to the Secretary and make available to the public an annual report listing of all amounts paid by the airport to other units of government and the purpose of payment. Airport owners or operators must also make available a listing of all services and property provided to other units of government and the amount of compensation received for the provision of each service and property. FAA Form 5100-126 is used for this purpose.

Financial Management: Form 5100-126

Summary (Annual Numbers)	Reporting	Recordkeeping
# of Respondents	550	
# of Responses per respondent	1	
Hours per Response	4	
Total # of responses	550	
Total burden (hours)	2,200	

49 U.S.C. § 47107(a)(15) requires the Secretary of Transportation to issue a simplified format for reporting applicable to Airports to assist in public understanding of airport finances and to provide information concerning the amount of any revenue surplus the amount of concession generated revenue, and other information required by the Secretary. FAA Form 5100-127 is used for this purpose. The most recently completed year for which we have available data at this time is 2017.

Financial Management: Form 5100-127 Commercial Service Airports

Summary (Annual Numbers)	Reporting	Recordkeeping
# of Respondents	550	
# of Responses per respondent	1	

Hours per Response	4	
Total # of responses	550	
Total burden (hours)	2,200	

<u>Financial Management:</u> Form 5100-127 Supplemental Information from Large, Medium and Small Hub Commercial Service Airports

Summary (Annual Numbers)	Reporting	Recordkeeping
# of Respondents	330	
# of Responses per respondent	1	
Hours per Response	1	
Total # of responses	330	
Total burden (hours)	330	

Sponsors of public use airports or public agencies that accept federal grants accept certain obligations and conditions. The FAA ensures sponsors comply with financial management requirements by collecting financial plans, such as Fuel Tax Action Plans, and working with sponsors to conduct Airport Financial and Single-Audit Reviews.

<u>Financial Management:</u> Compliance filings

Summary (Annual Numbers)	Reporting	Recordkeeping
# of Respondents	135	
# of Responses per respondent	1	
Hours per Response	50	
Total # of responses	135	
Total burden (hours)	6,750	

Sponsors of public use airports or public agencies with new (approximately 1,600 annually) and open grants (approximately 3,000 annually) submit standard forms to request reimbursement for covered expenses and to report how they expend grant funds.

<u>Financial Management:</u> Standard Forms 270, 271, 425, 425A

Summary (Annual Numbers)	Reporting	Recordkeeping
# of Respondents	4,600	
# of Responses per respondent	4	
Hours per Response	0.5	
Total # of responses	18,400	
Total burden (hours)	9,200	

Construction work on any grant project is subject to the inspection and approval of the Secretary. Regulations require cost and progress reporting by the sponsor. The following burden is associated with sponsor certification of qualified engineering and construction specifications, compliance with wage regulations, and periodic performance reporting. This information is submitted by sponsors of public use airports or public agencies with new (approximately 1,600 annually) and open grants (approximately 3,000 annually).

Performance Measurement: Forms 5100-140, 5370-1, Construction Management Plans

Summary (Annual Numbers)	Reporting	Recordkeeping
# of Respondents	4,600	
# of Responses per respondent	1	
Hours per Response	5	
Total # of responses	4,600	
Total burden (hours)	23,000	

Sponsors of public use airports or public agencies that accept federal grants accept certain obligations and conditions. The FAA ensures sponsors comply with performance management requirements through Personal Surplus Property registrations, Airport Land Use Inspection Reports, and other compliance filings.

Performance Measurement: Compliance filings

Summary (Annual Numbers)	Reporting	Recordkeeping
# of Respondents	80	
# of Responses per respondent	1	
Hours per Response	20	
Total # of responses	80	
Total burden (hours)	1,600	

Anyone concerned about an airport's compliance with its obligations may file informal or formal complaints with FAA. There are specific filing requirements under Part 16, and complainants and airport sponsors must comply in order to have their complaints adjudicated.

Performance Measurement: Part 16 Complaints

Summary (Annual Numbers)	Reporting	Recordkeeping
# of Respondents	13	
# of Responses per respondent	1	
Hours per Response	200	
Total # of responses	13	
Total burden (hours)	2,600	

Cost data is taken from US Dept. of Labor, Bureau of Labor Statistics Occupational Employment Statistics for labor category 00-0000, All Occupations, as the forms could be completed by staff in a wide range of positions and pay ranges (example, an engineer, clerk, certified public accountant, secretary, student intern, airport manager). The 2018 mean hourly wage rate for 00-0000 is \$29.76 (<a href="https://www.bls.gov/oes/current/oes\_nat.htm">https://www.bls.gov/oes/current/oes\_nat.htm</a>). The cost of benefits plus other overhead costs such as rent, utilities, and office equipment for government employees is calculated by multiplying this rate by 2 (U.S. Department of Health and Human Services, Guidelines for Regulatory Impact Analysis, Table 4.2, Constructing Default Estimates of the Value of Time, 2016;

https://aspe.hhs.gov/system/files/pdf/242926/HHS\_RIAGuidance.pdf). We calculate the total as follows:

2022 Mean Hourly Wage Rate	\$29.76
Total Hourly Rate with Fringe	
Benefit/Overhead Costs	\$59.52
Total Annual Hours	182,675
Total Annual Cost	\$10,872,816

IC Summary	Responses	Hours
Performance Measurement ICs:		
5100-140, 5370-1, Construction Management Plan	4,600	23,000
Compliance filings	80	1,600
Part 16 Complaints	13	2,600
Total Performance Measurement	4,693	27,200
Certifications and Representations ICs:		
Form 5100-128, 5100-129, 5100-130, 5100-131, 5100-132, 5100-133, 5100-134, 5100-135, 5100-145, Certification Regarding Lobbying, SF 1445, other filings	1,950	19,500
Total Certifications and Representations	1,950	19,500
Financial Management ICs:		
ACIP data	3,000	24,000
5100-100, 5100-101, SF 424	2,454	73,620
5100-108	150	75
5100-110, 5100-138, 5100-139, 5100-141, 5100-142, DOL 347	1,950	15,600
5100-136, 5100-137	2,000	2,000
5100-126	550	2,200
5100-127 and Supplemental	880	2,530
Compliance filings	135	6,750
SF 270, 271, 425, 425A	18,400	9,200
Total Financial Management	29,519	135,975
Total All ICs	36,162	182,675

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.

There are no material costs to respondents.

14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, 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.

Costs to the government—including staff, system, and contract costs—is \$12,856,900.

Cost data is taken from US Dept. of Labor, Bureau of Labor Statistics Occupational Employment Statistics. Many FAA staff participate in the administration of airport grant programs, and the particular positions that participate vary depending on office location. For this reason, we've used the average of the mean hourly wage of those positions most likely to manage airport grant programs at the FAA. Where available, we used the Federal average for each position:

- Management Analyst, 13-1111 (https://www.bls.gov/oes/current/oes131111.htm): \$49.51
- Engineer, 17-2000 (<a href="https://www.bls.gov/oes/current/naics3">https://www.bls.gov/oes/current/naics3</a> 481000.htm#17-0000): \$54.22
- Planner, 19-3051 (<a href="https://www.bls.gov/oes/current/oes193051.htm">https://www.bls.gov/oes/current/oes193051.htm</a>): \$51.64
- Compliance Officer, 13-1041 (<a href="https://www.bls.gov/oes/current/oes131041.htm">https://www.bls.gov/oes/current/oes131041.htm</a>): \$43.76
- Office and Administrative Support Workers, 43-9199
   (<a href="https://www.bls.gov/oes/current/oes439199.htm">https://www.bls.gov/oes/current/oes439199.htm</a>): \$25.54
- Average: \$44.93

The cost of benefits plus other overhead costs such as rent, utilities, and office equipment government employees is calculated by multiplying this rate by 2 (U.S. Department of Health and Human Services, Guidelines for Regulatory Impact Analysis, Table 4.2, Constructing Default Estimates of the Value of Time, 2016; <a href="https://aspe.hhs.gov/system/files/pdf/242926/HHS\_RIAGuidance.pdf">https://aspe.hhs.gov/system/files/pdf/242926/HHS\_RIAGuidance.pdf</a>). We calculate the total as follows:

2022 Mean Hourly Wage Rate	\$44.93
Total Hourly Rate with Fringe	
Benefit/Overhead Costs	\$89.86
Total Annual Hours	65,000
Total Annual Cost	\$5,840,900

In addition, the FAA incurs contract and system costs. The annual cost of development, updates, maintenance, and contract support for grant and compliance databases is approximately \$7 million. Contract costs for the solicitation and confirmation of all-cargo carrier activity is approximately \$16,000.

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

This renewal reflects increases in the number of respondents, hourly burden, cost to airports, and cost to the Federal Government. These adjustments are primarily caused by the inclusion of Bipartisan Infrastructure Law (BIL) grant programs and a more detailed accounting of the compliance-related components of airport grant programs. To ensure the agency could distribute BIL funds as quickly and efficiently as possible, the FAA relied on many of the processes, staff, and collection instruments already in use for existing airport grant programs. The addition of the compliance-related elements ensures the burden and cost associated with this collection are more accurate. This renewal also includes additional collection instruments that were incorporated into past burden calculations but not specifically identified (e.g., standard forms) and a more complete accounting of costs to the government. In the past, we showed an average burden on many of the forms, rather than the burden associated with that particular form. To correct this, we will update the incorrect burden statements on the following forms to reflect the burden associated with that form.

	Current Burden	Revised Burden
Forms	Hours Per Response	Hours Per Response
5100-128, 5100-129, 5100-130, 5100-131, 5100-132,		
5100-133, 5100-134, 5100-135	8	10
5100-145, Certification Regarding Lobbying, SF 1445	NA	10
5100-100, 5100-101, SF 424	28	30
DOL 347	NA	8
5100-136, 5100-137	8	1
5100-126	8	4
5100-127	8	4-5
Standard Forms 270, 271, 425, 425A	NA	0.5
5100-140, 5370-1, Construction Management Plans	8	5

16. 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.

The information collected will not be disseminated publicly except as follows:

- Airport financial data, collected via Forms 5100-126 and 127, is made available at
   <a href="http://cats.airports.faa.gov/">http://cats.airports.faa.gov/</a> per the Federal Aviation Authorization Act of 1994 to inform the
   public about how airports collect and disburse funds.
- Airport Compliance Reviews of Airport Noise Land Use and Financial Operations, conducted
  periodically at obligated airports to ensure adherence to Grant Assurances and the FAA's
  Revenue Use Policy, are posted to the FAA website at
  <a href="https://www.faa.gov/airports/airport\_compliance/compliance\_reviews">https://www.faa.gov/airports/airport\_compliance/compliance\_reviews</a>.
- Aviation Fuel Tax Plans are posted to Regulations.gov.
- Buy American waiver requests, which require public comment, and waivers issued as a result of these requests are made available at <a href="https://www.faa.gov/airports/aip/buy">https://www.faa.gov/airports/aip/buy</a> american/.
- Summarized data about grants issued as a result of information collected is published in annual reports, the NPIAS, and grant histories available at https://www.faa.gov/airports/.

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

We are not seeking approval not to display the expiration date.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions.