

Supporting Statement A
Inflation Reduction Act – Fueling Aviation’s Sustainable Transition Grant Program
OMB 2120-XXXX

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

Section 40007 of the Inflation Reduction Act of 2022 (P.L. 117-169) directs the Secretary of Transportation to implement a “competitive grant program for eligible entities to carry out projects located in the United States that produce, transport, blend, or store sustainable aviation fuel, or develop, demonstrate, or apply low-emission aviation technologies.” The Department of Transportation (DOT), Federal Aviation Administration (FAA) is seeking to establish this new grant program—named the Fueling Aviation’s Sustainable Transition (FAST) Grant Program—and collect project proposals via a Notice of Funding Opportunity (NOFO). FAST will have elements focused on sustainable aviation fuel (SAF), to be termed FAST-SAF, and elements focused on low-emission aviation technologies, to be termed FAST-Tech. The program aims to reduce the greenhouse gas emissions (GHG) associated with the aviation sector, in line with the net-zero GHG by 2050 goal outlined in the U.S. Aviation Climate Action Plan.¹ The amount of available funding for the two programs is \$244.53M and \$46.53M for FAST-SAF and FAST-Tech, respectively.

The NOFO will solicit project proposals from eligible entities. The collected information is required for FAA to evaluate proposals and distribute IRA funds to address U.S. climate goals.

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.

The FAA is collecting project information to help with the selection of projects to be funded by the Fueling Aviation’s Sustainable Transition (FAST) Grant Program. Eligible entities who elect to compete for funding and obtain benefits from the FAST Grant Program will submit project information. The information collected is based on grant criteria outlined in the IRA Section 40007.

The FAA will use information submitted to evaluate and select projects for funding that most closely align with the criteria outlined in the NOFO. A team of subject matter experts in aircraft technology development and sustainable aviation fuels (SAF) from the FAA and other government agencies will assess each application against the applicable criteria. The information FAA is collecting will include technical, project management, and cost proposals for candidate projects. Key evaluation criteria include the capacity for the project to increase the domestic production and deployment of SAF

¹ Available at https://www.faa.gov/sites/faa.gov/files/2021-11/Aviation_Climate_Action_Plan.pdf

or the use of low-emission aviation technologies and the projected greenhouse gas emissions from such a project.

The information collected will not be disseminated to the public.

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.

Project information will be solicited through a NOFO published to grants.gov. Applications will be collected via grants.gov. The NOFO outlines in detail the form of the full application. Where practical, the full application requires the use of existing standard grant forms.

The FAA Office of Environment & Energy (AEE) will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with FAA standards for confidentiality, privacy, and electronic information.

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.

This collection is related to the FAST Grant Program, which has specific criteria for project selection as outlined in the IRA. While the FAA may incidentally collect information about potential FAST applicants for other FAA acquisitions or grant programs, the project eligibility and technical criteria for this new grant program is unique. Other than basic applicant data, the information collected is unique.

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

The FAA is collecting the minimum amount of information needed so as not to overburden small entities. The FAA held an informational meeting on December 14, 2022, to provide an overview of the program and the statutory requirements. The FAA has received feedback and answered questions from interested applicants. Applicants should be well-informed on the program elements and have been provided sufficient notice to minimize the burden of developing project proposals.

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.

Failure to collect project proposals for the FAST Grant Program will result in non-

compliance with the IRA, prevent distribution of the funds in accordance with the law, and not allow the FAA to take important steps to addressing our climate goals. Collecting information less than every 1-2 years would prevent the FAA from soliciting proposals for future phases of the program, including a second phase that would enable first phase planning projects to progress to infrastructure construction projects.

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.*

There are no special circumstances associated with this collection.

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 May 24, 2023 (88 FR 33659) solicited public comments. The following comment was submitted anonymously:

“There are two parts to this, FAST-SAF and FAST-TECH. However, you state that there is only one NOFO. It appears that there should be two NOFO’s since there are two separate criteria for each program with definitions for each.”

Since the start of FAST program planning in the October/November timeframe of 2022, we have been planning for and communicating to stakeholders that we would be using a single NOFO to solicit applications for the entire program, covering both SAF and Tech elements. We communicated this at the FAST public information meeting in December 2022 and received no comments from the 700+ attendees on that approach. There are many programmatic reasons for our releasing this as a single NOFO, including:

- The statutory language calls for a single grant program with SAF and low-emissions technology elements.
- We expect the possibility of proposals containing both FAST-SAF and FAST-Tech elements. One NOFO enables us to review them side by side for potential interplay/synergy.
- Examining SAF and Tech in one NOFO allows for the most fair application of geographic diversity of awards criteria and equity considerations, and for examining the full program (across SAF and tech) in one senior-level evaluation
- External communications and approvals have committed to a single NOFO approach.
- The applicant pool is already expecting a single NOFO from public meeting content and single assistance listing.
- Other FAA grant programs (e.g., FAA Airports LOB [ARP]) do NOFOs with many proposal categories within the program. For example, the Airport Climate Challenge NOFO (also a discretionary grants program). The first element in the application requirements is to state which category they are applying for—they have four categories with different application content requirements and evaluation criteria. This single NOFO approach is a simpler version of what ARP already does in cases like this.

Additionally, an informational meeting on the program was held on December 14, 2022, to discuss technical requirements, legislative mandates, and competitive selection process. The NOFO incorporates the public comments that were received. Comments and questions that were addressed at the meeting have been collected in writing and addressed via information provided in the NOFO.

The following comment was submitted by Beta Analytic, Inc. Please note, only the first line of the comment is included below. The full comment is attached to this submission.

“Our recommendation is that the FAST-SAF grant program includes biogenic content testing requirements following the ASTM D6866 standard for any SAFs produced by co-processing.”

The FAST-SAF grant program will follow the statutory language of Section 40007 of the Inflation Reduction act regarding lifecycle value determinations described under section (e)(7)(E) parts (i) and (ii). This language requires methodology “similar to that adopted by the International Civil Aviation Organization” or that is “reflective of the latest scientific understanding of lifecycle greenhouse gas emissions” and “as stringent as the requirement under clause (i)”. Verification of biogenic content of SAF produced via co-processing is part of the lifecycle value determination that will be required as part of the project proposal.

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

The FAA will not provide gifts or remuneration.

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.

The FAA will not ask questions of a sensitive nature.

12. 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 under item 13.**

The FAA estimates the burden to respond to this information collection to be approximately 507 hours per applicant at a cost of \$28,735 to the applicant. The FAA anticipates approximately 50 individual applications, thereby running the total burden of the information collection to be 25,350 hours at a cost of \$1,436,736.

The time needed to develop an application will vary depending on the complexity of the proposed project. The particular staffing to develop the application will also vary, but we anticipate a combination of engineers, program management specialists, financial specialists, human resource specialists, lawyers, and management contributing to the application package. The below table provides estimates for the average hourly and cost burden for different job categories for each element of the full application. Mean hourly wage values are derived from the U.S. Bureau of Labor Statistics Occupational Employment and Wage Statistics (https://www.bls.gov/oes/current/oes_nat.htm#17-0000).

	Mean hourly wage		
Aerospace Engineer	\$ 61.10		
Chemical Engineer	\$ 56.64		
Civil Engineer	\$ 46.82		
Petroleum Engineer	\$ 68.66		
<i>Average Engr</i>	\$ 58.31		
Financial Specialist	\$ 44.37		
Lawyer	\$ 78.74		
HR Specialist	\$ 35.13		
Managers, All Other	\$ 67.88		
Project Management Specialist	\$ 48.85		
Role	Hours	Hourly Wage	Cost
Volume 1: Technical and Management Proposal			
Engineer	80	\$ 58.31	\$ 4,664.40
Engineer	80	\$ 58.31	\$ 4,664.40
Engineer	80	\$ 58.31	\$ 4,664.40
Project Management Specialist	40	\$ 48.85	\$ 1,954.00
Volume 2: Cost Proposal, Certifications and Declarations			
<i>SF-424</i>			
HR Specialist	2	\$ 35.13	\$ 70.26
<i>Senior/Key Person Profile</i>			
HR Specialist	2	\$ 35.13	\$ 70.26
<i>Research & Related Personnel Data</i>			
HR Specialist	2	\$ 35.13	\$ 70.26
<i>Research & Related Budget</i>			
Engineer	40	\$ 58.31	\$ 2,332.20
Financial Specialist	40	\$ 44.37	\$ 1,774.80
Financial Specialist	40	\$ 44.37	\$ 1,774.80
<i>Research & Related Federal and Non-Federal Budget</i>			
Financial Specialist	10	\$ 44.37	\$ 443.70
<i>Project/Performance Site Locations of Each Member</i>			
HR Specialist	2	\$ 35.13	\$ 70.26
<i>Indirect Cost Agreement</i>			
HR Specialist	1	\$ 35.13	\$ 35.13
Addendum			
HR Specialist	8	\$ 35.13	\$ 281.04
Overall Application Review			
Manager	40	\$ 67.88	\$ 2,715.20
Lawyer	40	\$ 78.74	\$ 3,149.60
Total Hours Per Applicant	507		
Total Cost Burden Per Applicant	\$ 28,734.71		
Expected Number of Applicants	50		
Total Program Hours	25350		
Total Program Burden	\$ 1,436,735.50		

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

Estimated labor costs for applicants are included in Section 12. There should be no other cost to applicants.

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.

The total estimated cost to the Federal government is \$260,693.

Review of applications by the government is expected to include participation from general engineers, management & program analysts, financial specialists, management, senior executives, and lawyers. We expect the team of technical reviewers (approximately 10 employees) to require 8 hours on average to review each submission (including discussion amongst the review team). Two financial specialists are estimated to spend 2 hours to review the budget package of each submission. Additional review of the overall package of recommended applications by management, legal counsel, and senior executives will also be necessary. These estimates are detailed in the below table, which also includes mean hourly wages derived from U.S. Bureau of Labor Statistics Occupational Employment and Wage Statistics for the Federal Executive Branch (NAICS 999100 - https://www.bls.gov/oes/current/naics4_999100.htm#11-0000).

	Mean hourly wage		
General Engineer (Engineers, All Other)	\$ 61.48		
Management & Program Analyst (Management Analyst)	\$ 49.51		
Lawyer	\$ 73.41		
Senior Executive (Top Executive)	\$ 68.85		
Financial Specialist	\$ 45.25		
Manager, All Other	\$ 66.50		
Role	Hours	Hourly Wage	Cost
Technical Review			
General Engineer	8	\$ 61.48	\$ 491.84
General Engineer	8	\$ 61.48	\$ 491.84
General Engineer	8	\$ 61.48	\$ 491.84
General Engineer	8	\$ 61.48	\$ 491.84
General Engineer	8	\$ 61.48	\$ 491.84
General Engineer	8	\$ 61.48	\$ 491.84
Management & Program Analyst	8	\$ 49.51	\$ 396.08
Management & Program Analyst	8	\$ 49.51	\$ 396.08
Management & Program Analyst	8	\$ 49.51	\$ 396.08
Management & Program Analyst	8	\$ 49.51	\$ 396.08
Financial Specialist	2	\$ 45.25	\$ 90.50
Financial Specialist	2	\$ 45.25	\$ 90.50
Manager	2	\$ 66.50	\$ 133.00
Senior Level Review			
Senior Executive	0.5	\$ 68.85	\$ 34.43
Senior Executive	0.5	\$ 68.85	\$ 34.43
Legal Review			
Lawyer	2	\$ 73.41	\$ 146.82
Lawyer	2	\$ 74.41	\$ 148.82
Total Cost Per Application	\$ 5,213.85		
Expected Number of Applications	50		
Total Cost to Federal Government	\$ 260,692.50		

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

N/A – This is a new information collection for a new grant program.

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 project information submitted under this collection will not be published. However, once funding decisions are made, the FAA will publish a list of projects funded under the FAST Grant Program on the FAA website.

The FAA will collect project proposals at the onset of each new phase of the FAST Grant Program. Currently, it is envisioned that a solicitation for a second phase of the program will occur in 2025. Additional future phases are dependent on congressional direction.

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 to not 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.