

Department of Transportation (DOT)
Federal Highway Administration (FHWA)

The Supporting Statement A

**Survey of Metropolitan Planning Organizations and State Departments of Transportation
Regarding Practices for Incorporating Equity and Meaningful Public Involvement in
Transportation Planning and Project Decision-Making**

OMB Control No. 2125-0665

Introduction:

This is a renewal information collection clearance request is titled “Survey of Metropolitan Planning Organizations and State Departments of Transportation Regarding Practices for Incorporating Equity and Meaningful Public Involvement in Transportation Planning and Project Decision-Making.” The information collection will be a survey of all Metropolitan Planning Organizations (MPOs) and State Departments of Transportation (State DOTs). The survey will ask MPOs and State DOTs about their transportation planning and programming activities and policies, in regard to the advancement of equity and meaningful public involvement.

This information collection clearance request is a revision on an approved request from 2022 for a similar survey (OMB control number: 2125-0665). This new request seeks clearance to conduct similar annual surveys in 2024-2026 (three-year clearance).

Part A. Justification.

1. Circumstances that make collection of information necessary:

The proposed survey will provide information to assess progress on key performance indicators in the U.S. DOT Equity Action Plan (<https://www.transportation.gov/priorities/equity/equity-action-plan>; 88 FR 36642) and in support of U.S. DOT’s implementation of Executive Order 13985: Advancing Racial Equity and Support for Underserved Communities Through the Federal Government and Executive Order 14091: Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government. These executive orders establish a government-wide policy to “pursue a comprehensive approach to advancing equity for all, including people of color who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality,” and provides an expanded definition of “equity” goes beyond definitions in past executive orders. The executive orders stress the importance of engagement with members of underserved communities in service of equity goals.

FHWA conducted a survey of State Departments of Transportation (State DOTs) and Metropolitan Planning Organizations (MPOs) in 2022 to establish a baseline for relevant key performance indicators related to equity and the transportation planning process. These results were published in a summary of the 2022 survey (https://www.transportation.gov/sites/dot.gov/files/2023-11/Summary%20of%202022%20Equity%20in%20the%20Transportation%20Planning%20Process_FINAL.pdf).

The 2022 survey provided sufficient information to establish a baseline on State DOT and MPO equity practices in transportation planning. Without additional surveys, FHWA does not currently have means to track ongoing progress. State DOTs and MPOs have not been required by statute or regulation to include information about equity practices in their required transportation planning

process documents. The proposed information collection is the most effective way to gather information on equity practices in transportation planning for 2024-2026. Furthermore, in the 2022 survey, FHWA asked responding agencies to indicate what the best means of gathering similar information would be in future years. The most common response (54%) was to "Repeat this (or a similar) survey annually."

The data from the survey will be used to inform progress on the following key performance indicator in the U.S. DOT Equity Action Plan: "All 50 State DOTs and Top 100 MPOs adopt a quantitative equity screening component to their S/TIP development processes by 2030." It will also inform progress on the equity goal established in the U.S. DOT Strategic Plan FY 2022-2026: "Reduce inequities across our transportation systems and the communities they affect. Support and engage people and communities to promote safe, affordable, accessible, and multimodal access to opportunities and services while reducing transportation-related disparities, adverse community impacts, and health effects," specifically the *Power of Community* objective.

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

This proposed information collection will be used by the Federal Highway Administration's (FHWA) Office of Planning, Environment and Realty (HEP), the Federal Transit Administration's Office of Planning and Environment (TPE), and the Office of the Assistant Secretary of Transportation for Policy (OST-P), in conjunction with research conducted by the U.S. DOT John A. Volpe National Transportation Systems Center (Volpe Center), to monitor progress on the following key performance indicator in the U.S. DOT Equity Action Plan and the U.S. DOT Strategic Plan FY 2022-2026: *All 50 State DOTs and top 100 MPOs adopt a quantitative Equity Screening component to their S/TIP development processes by 2030.*

U.S. DOT will use the survey results to assess which State DOTs and MPOs report that they are using equity as a prioritization factor in the transportation planning process. This will be assessed for three different stages of the transportation planning process: development of the planning work program (Question 10), development of the long-range transportation plan (Question 11), and development of the program of funded projects (Question 12). U.S. DOT does not plan to publish individual agency assessments of progress, but does plan to publish aggregated information about how agencies are progressing on this topic.

The survey results will also inform the development of future resources for State DOTs and MPOs on how to address equity in the transportation planning process, and how to meaningfully involve all members of the public (including underrepresented and underserved groups) in the development, prioritization, and selection of transportation projects. HEP, and TPE will use the survey results to inform technical assistance, training, and research activities designed to support State DOTs and MPOs in advancing equity goals outlined in the USDOT Equity Action Plan, USDOT Strategic Plan FY 2022-2026, and Executive Orders 13985 and 14091.

3. Extent of automated information collection:

The survey will be conducted using an online survey platform (Qualtrics or similar) distributed via email to a pre-screened list of contacts (one per each organization). All responses will be electronic, and the survey platform will allow respondents to save their progress, completing a portion of the survey and returning later. The platform will automatically aggregate responses to closed-ended questions, which will reduce the burden on the Federal government.

4. Efforts to identify duplication:

HEP, TPE, and OST-P have worked with the Volpe Center to research information about how State DOTs and MPOs address equity in the transportation planning process. This research

included a review of all State DOT Long Range Statewide Transportation Plans and Statewide Transportation Improvement Programs, as well as a random selection of approximately ten percent of MPO Metropolitan Transportation Plans and Transportation Improvement Programs. This research concluded that State DOTs and MPOs are not providing sufficient information in their publicly available (online) planning documents to meet U.S. DOT needs for this baseline effort.

When conducting the survey on this topic in 2022, FHWA asked respondents what the best way would be to collect this information in future years. The most common response (54%) was to "Repeat this (or a similar) survey annually."

Prior to conducting the 2022 survey, FHWA also consulted with membership organizations which represent nearly all State DOTs and MPOs, and these organizations confirmed that the information sought in the survey is not available from any current source.

5. Efforts to minimize the burden on small businesses:

N/A. Small businesses will not be asked to respond to this information collection.

6. Impact of less frequent collection of information:

This request is for a recurring annual information collection over the course of three years (2024-2026). During this time period, U.S. DOT will continue to investigate alternative means of collecting this information and will consider alternatives prior to requesting a renewal of this information collection for 2027 and beyond.

If the information collection were to happen less frequently than annually, U.S. DOT will not be able to adequately monitor State DOT and MPO progress in advancing equity in the transportation planning process. The annual collection provides U.S. DOT with information that enables it to target efforts, as needed, to assist State DOTs and MPOs in incorporating equity into their transportation planning processes and to report progress through annual updates to the Equity Action Plan.

7. Special circumstances:

N/A. There are no special circumstances associated with this information collection request.

8. Compliance with 5 CFR 1320.8:

The 60-day Federal Register notice that solicited public comments on this proposed information collection was published on October 27, 2023, on pages 73932 and 73933 [88 FR 73932]. No comments were submitted to the docket.

The 30-day Federal Register notice was published on May 1, 2024, at [89 FR 35300].

9. Payments or gifts to respondents:

There will be no gifts or payments to respondents to the information collection. Response will be on a voluntary basis only, with no compensation.

10. Assurance of confidentiality:

FHWA does not have a statutory basis to provide respondents with an assurance of confidentiality. FHWA does not plan to report the individual responses of any of the responding agencies; only aggregate estimates will be reported.

11. Justification for collection of sensitive information:

N/A. The information collection will not request sensitive or private information.

12. Estimate of burden hours for information requested:

FHWA will request responses from up to 472 individuals, representing all State DOTs and MPOs in the United States. This will be a recurring annual information collection over three years (2024-2026) with an estimated individual burden of one hour per respondent. Information will be collected via survey, conducted by the Volpe Center on behalf of FHWA. The total estimated burden in hours is 472 hours annually (1,416 hours over three years). Assuming a mean hourly wage of \$39.63¹ plus \$15.46 for benefits (30 percent of hourly wage), and a fully-loaded hourly rate of \$55.09, the total estimated cost for the burden hours of this information collection is \$26,002.48 annually (\$78,007.44 over the three-year period).

13. Estimate of total annual costs to respondents:

FHWA does not estimate any additional costs to respondents beyond the hours burden.

14. Estimate of cost to the Federal government:

The estimated cost to the Federal government for this information collection is \$75,000 per year (\$225,000 total over three years). This cost is comprised entirely of Federal labor and overhead expenses, including FHWA, OST-P, and FTA staff, and the costs of support from the Volpe Center.

15. Explanation of program changes or adjustments:

This is a renewal information collection. It builds upon a similar survey conducted in 2022 (OMB Control Number 2125-0665). The results were published in a summary of the 2022 survey (https://www.transportation.gov/sites/dot.gov/files/2023-11/Summary%20of%202022%20Equity%20in%20the%20Transportation%20Planning%20Process_FINAL.pdf).

FHWA has made modifications to the proposed survey based on the results of the 2022 survey, and to address feedback from State DOTs and MPOs. The proposed new survey for 2024-2026 covers the same general topics but includes improved question wording and new questions.

16. Publication of results of data collection:

U.S. DOT does not intend to publish the results of this data collection (individual responses). However, U.S. DOT may publish a high-level summary that does not include individual agency responses, similar to the one published summarizing the 2022 survey.

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

¹ Based on data from the Bureau of Labor Statistics (see [Bureau of Labor Statistics' median hourly rates for urban and regional planners](#))

N/A. U.S. DOT does not have any objection to publishing the expiration date of the OMB approval.

18. Exceptions to certification statement:

N/A. None