

FEDERAL RAILROAD ADMINISTRATION
Grant Management Requirements for
Federal Railroad Administration
Grant Awards and Cooperative Agreements (“Awards”)
SUPPORTING JUSTIFICATION
OMB Control Number 2130-0615

Summary of Submission:

- This submission is a request for a revision of the last three-year approval granted by the Office of Management and Budget (OMB) on May 05, 2022, which expires January 31, 2025.
- The Federal Railroad Administration (hereafter “FRA” or “the Agency”) published the required 60-day Federal Register (FR) Notice on October 4th, 2024, see 89 FR 80983. FRA received one comment in response to this Notice. See question #8 for response to comment.
- Program change decreased the burden by 8,470 hours and responses by 165.
- Adjustments decreased the burden by 2,168 hours and responses by 1,643.
- Overall, program changes and adjustments decreased the burden by 10,638 hours.
- The answer to question 12 itemizes all information collection requirements.
- The answer to question 15 itemizes all adjustments.

1. Circumstances that make collection of the information necessary.

The Office of Management and Budget (OMB) Circular 2 CFR 200, issued on December 26, 2014, sets forth the standards for administration of Federal grants to all Financial Assistance entities. Federal grant-making agencies are required to incorporate the contents of the 2 CFR 200 in their grant regulations, which the Department of Transportation (DOT) codified as 49 U.S.C. 322(a), and 49 CFR part 1201 and DOT accepts OMB-required reporting and recordkeeping requirements in Sections 2 CFR 200.206 and 200.327.

The Federal Railroad Administration (FRA) is an Operating Administration of the DOT. FRA solicits grant applications for viable projects including, but not limited to, preconstruction planning activities, safety improvements, congestion relief, improvement of grade crossings, rail line relocation, as well as projects that encourage development, expansion, and upgrades to passenger and freight rail infrastructure and services. Funded projects are those that meet statutory requirements as well as FRA and government-wide evaluation standards, and align with DOT’s strategic goals as detailed below:

- *Safety*: Make our transportation system safer for all people. Advance a future without transportation-related serious injuries and fatalities.

- *Economic Strength and Global Competitiveness*¹: Grow an inclusive and sustainable economy. Invest in our transportation system to provide American workers and businesses reliable and efficient access to resources, markets, and good-paying jobs.
- *Equity*: 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.
- *Climate and Sustainability*: Tackle the climate crisis by ensuring that transportation plays a central role in the solution. Substantially reduce greenhouse gas emissions and transportation-related pollution and build more resilient and sustainable transportation systems to benefit and protect communities.
- *Transformation*: Design for the future. Invest in purpose-driven research and innovation to meet the challenges of the present and modernize a transportation system of the future that serves everyone today and, in the decades to come.
- *Organizational Excellence*: Strengthen our world-class organization. Advance the Department’s mission by establishing policies, processes, and an inclusive and innovative culture to effectively serve communities and responsibly steward the public’s resources.

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

FRA administers award agreements for both construction and non-construction projects that will result in service benefits or other improvements in rail. These projects include completion of planning, preliminary engineering, environmental review and project development, final design, and construction activities.

To ensure accountability of Federal award recipients through performance and results, including expenditures in support of agreed-upon activities and allowable costs outlined in FRA’s Notice of Grant Award (NGA), FRA requires a systematic and uniform collection and submission of information, as approved by the OMB.

FRA collects reports, documents, and other information from its grant recipients throughout the grant lifecycle as a primary means of practicing effective oversight of Federal investments in rail projects to enable the safe, reliable, and efficient movement of people and goods for a strong America, now and in the future.

FRA makes use of additional resources to compile evidence relevant to provide effective oversight in delivering Federal financial assistance and encourage continuous improvements in service delivery. For example, FRA may hold recurring or ad-hoc meetings with its grant recipients to discuss project progress. FRA also conducts a yearly risk assessment of its grants portfolio and selects certain projects to receive additional review and monitoring.

¹ [FY 2022-26 U.S. DOT Strategic Plan and Progress Report | US Department of Transportation.](#)

The data collected is detailed in the following tables below and describes each FRA document collection conducted throughout the grant lifecycle, including the purpose and means of the collection of each document:

Application - OMB Standard Forms

All standard forms (SF) listed in the tables below are used as part of the FRA Grants application process. The burden hours for the SF forms are accounted for under the host OMB control number and are not included with this ICR submission.

Documentation	Host OMB Control #	Purpose	Means of Collection	Annual Frequency
SF-424 Application for Federal Assistance	4040-0004	Collect applicant and proposed project data, including descriptive title of project, location of proposed activity, and budget summary. Auto-populates data to other OMB forms and templates to minimize burden.	Fillable PDF to be uploaded to Grants.gov	1
SF-424 A Budget Information - Non-Construction Programs	4040-0006	Summarize project budgetary information, detailing Federal and non-Federal funding sources, costs by object class categories, or forecasted cash needs by year.	Fillable PDF to be uploaded to Grants.gov	1
SF-424 B Assurances - Non-Construction Programs	4040-0007	Assure that applicant will comply with all applicable federal regulations and statutes, including property disposal provisions, allow federal agency access to Federally funded project records and documentation, and deliver project activities within a timeframe specified in an award agreement. Assure that applicant will exercise effective oversight of construction and engineering activities.	Print, scan, and upload to Grants.gov	1
SF-424 C Budget Information - Construction Programs	4040-0008	List project budget by cost classification items, including both allowable and non-allowable costs under a federal award.	Fillable PDF to be uploaded to Grants.gov	1
SF-424 D Assurances - Construction Programs	4040-0009	Assure that applicant will comply with all applicable federal regulations and statutes, allow federal agency access to Federally funded project records and documentation, and deliver project activities within a timeframe specified in an award agreement.	Print, scan, and upload to Grants.gov	1
Disclosure of Lobbying Activities (SF-LLL) ²	4040-0013	Disclosure of applicant's lobbying activities, affecting initial or continued Federal funding of awardee project.	Print, scan, and upload to Grants.gov	1

Application - FRA Forms

² 31 U.S.C. 1352.

Documentation	Purpose	Means of Collection	Annual Frequency
Pre-award Authority Request Form (FRA F 6180.288) <i>(New form)</i>	Allows project sponsors who would like to incur eligible pre-award costs to request pre-award authority from FRA via a standardized form. Streamlines the information collection process and FRA's subsequent review of the request. Directs the project sponsor to confirm that it understands that pre-award costs are considered at-risk until the grant agreement has been fully executed, and that FRA will authorize such costs only to the extent they are allowable under the terms of the grant agreement.	Fillable electronic PDF submitted via email	1
FRA F 6180.251 ³ Applicant Financial Capability Questionnaire	Evaluate the risks associated with financial assistance applicants.	Fillable PDF to be uploaded to Grants.gov	1
FRA F 6180.30 FRA ⁴ Assurances & Certifications Regarding Lobbying; Debarment, Suspension and Other Responsibility Matters and Drug-Free Workplace Requirements	Certify that applicant has not committed actions which may result in suspension or debarment and upholds the requirements for maintaining a drug-free workplace. Record applicant's lobbying activities.	Print, scan, and upload to Grants.gov	1

Award Maintenance - OMB Standard Forms

Documentation	Host OMB Control #	Purpose	Means of Collection	Annual Frequency
SF-270 ⁵ Request for Advance or Reimbursement	4040-0012	Collect advance payment or reimbursement request from awardee by program/function/activity, including payee information, program outlays to date, program income, and proposed estimated outlays. Specify outlays by Federal and non-Federal shares, and amount requested for advance or reimbursement.	Delphi eInvoicing	4
SF 425 ⁶ Federal Financial Report	4040-0014	Record cumulative Federal cash received, disbursed, and on hand; expenditures and unliquidated obligations against available budget; cumulative expenditures under the grant to date; recipient share of	Submitted through GrantSolutions.gov	4

³ 2 CFR 200.205.

⁴ 2 CFR 180, 49 CFR 32 and 49 CFR 20.

⁵ 2 CFR 200.305(b).

⁶ 2 CFR 200.308.

		expenditures against total recipient share of budget; program income; and indirect costs.		
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Award Maintenance - FRA Forms

Documentation	Purpose	Means of Collection	Frequency
Additional Required Buy America Documentation	Certify compliance with or seek an exemption from the provisions of Buy America as allowed by the Secretary of Transportation; petition FRA to Investigate Compliance of Successful Bidder/ Offeror with Bidder’s/Offeror’s Certification; pre- and post-award audit.	Various	1
FRA F 6180.34 Quarterly Progress Report <i>(Updated)</i> ⁷	Track progress of awardee programmatic and financial performance for the reported quarter and proposed activities for the following quarter	Fillable PDF to be submitted via Grant Solutions	4
FRA F 6180.252 Payment Summary Spreadsheet	Collect expenditure amounts at the task level and by federal and matching shares, which is a greater level of detail than the SF-270, which the Payment Summary Spreadsheet accompanies. Allows FRA to monitor expenditures against the approved project budget.	Delphi eInvoicing	4
FRA F 6180.31 ⁸ Grant Adjustment Request Form (GARF) <i>(Updated)</i> ⁹	Request amendment of the NGA terms and conditions and record the nature and rationale for the requested adjustment, as well as risk factors and risk mitigation, as recommended by FRA, of approving the adjustment.	Fillable PDF to be emailed to FRA	1
FRA F 6180.32 Service Outcome Agreement Annual Reporting	Provide an annual update on the status of current and past FRA-funded obligations towards commencement of service and for a period of 20 years after service initiation.	Email	1

⁷The Quarterly Progress Report was updated by adding a Certification Checkbox after Field 10 for recipient to mark.

⁸ 2 CFR 200.308.

⁹ The term “Grantee” has been changed to “Recipient”. On Page 1, the first use of “NGA” has been defined (Notice of Grant Award). Page 5, box F, the prompt has been updated to, “If this is an OST program (e.g., INFRA, MEGA, RAISE), has OST approved the adjustment? If no, do not proceed until you have obtained OST approval.” An “N/A checkbox was added. Page 5, Section V, a financial field has been added next to “If yes, denote the amount of needed Federal funds.”

Documentation	Purpose	Means of Collection	Frequency
FRA F 6180.217 Categorical Exclusion Worksheet	Compliance with the National Environmental Policy Act (NEPA) ¹⁰ and associated laws is required prior to the obligation of a grant	Word Document to be emailed to FRA, and upload to Grants.gov	1

¹⁰ National Environmental Policy Act of 1969, Pub. Law 9-190 (January 1, 1970).

Closeout - FRA Forms

Documentation	Purpose	Means of Collection	Annual Frequency
FRA F 6180.33 ¹¹ Final Performance Report	Provide a full accounting of project performance upon completion of the period of performance, summarizing project objectives, activities, outputs, outcomes, performance measures, lessons learned, budgetary narrative, and feedback from the recipient.	Fillable PDF to be emailed to FRA	1

3. Extent of automated information collection.

FRA highly encourages and strongly endorses the use of advanced information technology, wherever possible, to reduce burden on respondents. FRA utilizes, to the extent possible, automated systems and formats for collecting all information necessary in compliance with 2 CFR § 200.337.

FRA has streamlined reporting formats using fillable PDF forms with drop-down fields, that reduce the time required for awardees to complete and submit required reports. FRA strongly endorses submitting documents electronically and depending on the form, recipients can scan, email, or upload directly to Grants.gov.

While recipients continue to be provided the option of submitting some documentation via email, based on previous years submissions, FRA estimates that approximately 100 percent of applications will be completed by using automated systems.

4. Efforts to identify duplication.

In order to identify duplication, FRA maintains a program management database with unique elements that are used to compare and crosswalk against new or existing applications and all other data elements—internal or external—to minimize the amount of information requested from the recipient.

Project narratives and statements of work are generally project specific, and the information provided in a statement of work is unique and not available elsewhere.

When appropriate, to reduce duplication, relevant materials previously provided to FRA may be referenced and described as unchanged. To the extent referenced, this information need not be resubmitted. This procedure is expected to continue to be followed by recipients in the future.

5. Efforts to minimize the burden on small business.

There are no impacts to small businesses anticipated in this data collection.

¹¹ 2 CFR 200.343.

6. **Impact of less frequent collection of information.**

FRA implements information collection policies and procedures with consideration of efficient Federal funding oversight, compliance with government wide standards and regulations, and minimization of time and cost burdens. Information collection policies and procedures result from careful consideration of the data necessary for stewardship of Federal funds and cost-efficient project execution. At each phase of the award lifecycle, FRA mandates collection only of information that meets these criteria.

Application Forms

Proposed new form—Pre-Award Authority Request Form (FRA F 6180.288)

Currently, FRA accepts requests for pre-award authority via a letter from the recipient. The purpose of FRA F 6180.288 is to allow recipients who would like to incur eligible pre-award costs to request pre-award authority from FRA by submitting a standardized form. This form streamlines the information collection process and FRA's subsequent review of the request. The form also directs the recipient to confirm that it understands that pre-award costs are considered at-risk until the grant agreement has been executed, and that FRA will authorize such pre-award costs only to the extent such costs are allowable under the terms of the grant agreement.

Award Maintenance Requirements

FRA must collect reports and technical deliverables to ensure progress and performance and meet the FRA's fiduciary responsibility. Without interim reports, such as FRA F 6180.34 Quarterly Progress Report (QPR) FRA would not be able to: monitor and assess the progress of selected awards; verify projects are on track for scope, schedule, and budget; or identify projects needing additional FRA assistance or support. Furthermore, without this collection of information, FRA would not be able to accurately provide current or future budget estimates or respond to agency or Congressional inquiries related to the status of selected projects.

The collection of quarterly and financial reports enables FRA to fulfill statutory and regulatory requirements, contribute to the economic development of States and the District of Columbia, and promote and enhance safe rail and reliable transportation throughout the United States.

Awardees utilize the Payment Summary Spreadsheet (FRA F 6180.252) to allocate expenditures by approved project budget task and by federal and matching shares. This allows awardees to demonstrate compliance with requirements to expend funds in line with the approved project budget. The form contains auto calculated cells to reduce burden on the awardees and mathematical errors. Without such systemization for payment processing, FRA's time burden for reviewing payment requests, and the likelihood for non-compliance with the approved project budget, would increase.

To further reduce awardees' burden, FRA may in the future allow recipients to upload final performance reports to a secure web portal, instead of via email. In this way,

information transmission would be more direct, and FRA's burden would be further reduced.

FRA and recipients utilize the GARF (FRA F 6180.31) to review and approve minor amendments, no-cost extensions, statement of work (SOW) revisions, and any significant changes to NGAs efficiently. In the GARF, recipients justify the need for an adjustment, and FRA reviews the recipients' input to make a decision that balances program goals with the recipients' progress and performance. FRA implements a thorough, multi-level review process that assesses the recipient's request from programmatic, financial, and compliance-related perspectives. Without the GARF, FRA would be at a disadvantage in efficiently collecting data from recipients in requesting and justifying their requests for adjustments to the NGA. Additionally, FRA's process for reviewing adjustment requests would require additional time and effort, leading to higher costs and project delays. Using the GARF also ensures FRA collects the information it needs from the recipients the first time, thereby reducing the need for follow-up questions and additional work on the part of recipients.

FRA collects Buy America waivers from awardees that are unable to fulfill the Buy America requirements. Waivers must clearly state the reasons for the inability to meet Buy America requirements, the as outlined in the Passenger Rail Investment and Improvement Act of 2008 (PRIIA)¹² Buy America or one of the exceptions found in the Buy American Act and its implementing regulations. In reviewing Buy America waivers, FRA and DOT weigh the awardee's ability to meet project deliverables and support economic opportunity for American companies and workers. To maximize opportunities for American businesses to fill the needs of FRA awardees, all waiver requests must be published in the Federal Register before they are granted, and DOT posts waiver requests on its website. Waiver requests serve as the justification for awardees to proceed with project activities, including procurement, by transacting with non-American companies and businesses on an exceptional basis only. Without the information collection described in this submission, the FRA Administrator could not fulfill the Administrator's duties under DOT's Buy America policy. Specifically, the Administrator could not (1) be reasonably certain that the FRA is complying with the Buy America policy of only obligating an amount to carry out an FRA funded project if the steel, iron, and manufactured goods used in the project are produced in the United States, (2) perform the fact-finding necessary to grant or deny a waiver, (3) justify the Administrator's grants of any waivers, (4) communicate to awardees through the application and Awards negotiation process to verify compliance with the Buy America, (5) investigate and document any reported or discovered non-compliance with the Buy America, (6) audit awardees pre-award to verify compliance with the Buy America, and (7) encourage domestic production of rolling stock by requesting borrowers submit plans to improve domestic rolling stock to assist awardees in complying with the Buy America.

The SOA (FRA F 6180.32) provides an annual assessment of current and past awardees' progress towards commencing service and compliance with SOA provisions towards meeting milestones and commitments. Without this annual update, FRA would face challenges in evaluating the long-term outcomes, benefits, and cost-effectiveness of

¹²Pub.L 110-432 (Oct 16, 2008)

service projects. The SOA also gives FRA the ability to determine eligibility of past awardees for future funding, based on awardees' long-term performance.

The Categorical Exclusion (CE) Worksheet (FRA F 6180.217) is used to ensure FRA meets the statutory requirements of NEPA and related laws and regulations. The information collected through this form is used to confirm that the project scope being funded through the grant meets FRA categorical exclusions, which allows for the completion of this form instead of a lengthier environmental assessment (EA) or environmental impact assessment (EIS). Absent the CE Worksheet, the same information would still need to be collected from the recipient, as required by CEQ regulations and FRA's procedures for implementing NEPA found at 23 CFR Part 771. The CE Worksheet provides a logical and efficient way to collect the information FRA needs to meet its requirements under NEPA while minimizing over-reporting of information.

Closeout

Similar to the QPR, FRA F 33 Final Performance Report enables project-level assessment as a fundamental component of an overall evaluation of FRA programs. DOT utilizes final reporting data from FRA and other agency operating administrations in its reports to Congress. Without final reports, FRA would face serious challenges in recording and analyzing the completeness and lasting impact of award-funded projects, including monitoring patent disclosure (if applicable), status of construction and inspection activities at the close of the project, and condition of Federally owned property (if applicable) that are included in required close-out reports by State governments. Such data inform future funding and program decisions.

7. Special Circumstances.

All information collection requirements are in compliance with this section.

8. Compliance with 5 CFR 1320.8.

As required by the Paperwork Reduction Act of 1995 (PRA) and 5 CFR 1320, FRA published a notice in the Federal Register on October 4th, 2024, soliciting comments.¹³ FRA received one comment related to the proposed collection of information.

On December 10, 2024, FRA received a comment from American Short Line and Regional Railroad Association (ASLRRA) expressing support for FRA's grant program and the proposal to add the new form FRA F 6180.288. ASLRRA believes that this important tool can help grantees, not only in the management of their project budgets, but will offer maximum flexibility, efficiency, and safety-critical repairs and investments. In addition, ASLRRA expressed that the changes will speed up the typically time-sensitive process of pre-award authority, and that they had no concerns with the proposed updates to forms FRA F 6180.31 and 6180.34, nor with the proposal to discontinue the duplicative FRA F 6180.35.

¹³89 FR 80983.

Consultations with representatives of the affected population:

FRA meets with impacted stakeholders to ensure that requested information is both useful to FRA and to the recipient, and that FRA is not causing undue burden on the recipient. FRA does so through individual calls with stakeholders, frequent project team communication, and the delivery of technical assistance through webinars, as well as informational conferences such as the FRA Project Delivery Workshop in July 2024. This most recent submission includes a proposal for a new form FRA F 6180.288 Pre-Award Authority Form, which was developed following feedback from recipients regarding the Pre-Award Authority request process after making award announcements. The feedback prompted FRA to post "FRA Answers to Frequently Asked Questions about Pre-Award Authority" to its website ([FAQ - Pre-Award Authority](#)) which then led to the development of the FRA F 6180.288. FRA continues to seek ways to improve the communication with stakeholders and to minimize the burden being placed on them through data collection.

9. Payments or gifts to respondents.

There are no monetary payments or gifts made to respondents associated with the information collection requests.

10. Assurance of confidentiality.

All material provided by recipient is proprietary and is subject to the Freedom of Information Act (FOIA).

Statements of work and project reports submitted by recipients pursuant to an NGA become agency records and thus subject to the FOIA and to public release through individual FOIA requests. FRA also recognizes that certain information submitted by awardees could be exempt from public release under FOIA because of the application of one of the FOIA exemptions which protect trade secrets and commercial or financial information obtained from a person that is privileged or confidential.

Entities seeking exempt treatment must provide a detailed statement supporting and justifying their request and should follow FRA's existing procedures for requesting confidential treatment in the railroad safety context found at 49 CFR 209.11.

As noted in the DOT's FOIA implementing regulation (49 CFR Part 7), the burden is on the entity requesting confidential treatment to identify all information for which exempt treatment is sought and to persuade the agency that the information should not be disclosed (see 49 CFR 7.17). The final decision as to whether the information meets the standards of exemption rests with FRA.

11. Justification for any questions of a sensitive nature.

The information collection does not contain any data of a personal or sensitive nature.

12. Estimate of burden hours for information collected.

Through application solicitation and awards management, FRA has calculated a burden associated with applications, deliverables, and reports.

Form Name	Form Number	Grant Activity /Process	Respondent Universe (A)	Average Time per Response (in hours) (B)	Total Annual Burden Hours (C = A * B)	Total Cost Equivalent in U.S. dollar (D = C * wage rates) ¹⁴
Applicant Financial Capability Questionnaire	FRA F 6180.251	Application	1000	2	2,000	\$123,700
FRA Assurances and Certifications Regarding Lobbying; Debarment, Suspension and Other Responsibility Matters and Drug-Free Workplace Requirements	FRA F 6180.30	Application	1000	0.25	250	\$15,462.50
Pre-Award Authority Request — Project Sponsors that wish to incur pre-award expenses can apply for pre-award authority. (<i>New Form</i>)	FRA F 6180.288	Pre-Award	100	3	300	\$18,555.00
Payment Summary Spreadsheet	FRA F 6180.252	Awards & Maintenance	860	0.50	430	\$26,595.50
Quarterly Progress Report ¹⁵ (FRA F 6180.34; new awards) <i>Revised form</i>	FRA F 6180.34	Awards & Maintenance	500	2	1,000	\$61,850.00
Quarterly Progress Report ¹⁶ (FRA F 6180.34; existing recipients) <i>Revised form</i>	FRA F 6180.34	Awards & Maintenance	864	2	1,728	\$106,876.80
Grant Adjustment Request Form (GARF) <i>Revised form</i>	FRA F 6180.31	Awards & Maintenance	212	1	212	\$13,112.20
Service Outcome Agreement (SOA) Annual Reporting	FRA F 6180.32	Awards & Maintenance	24	1	24	\$1,484.40

¹⁴ The dollar equivalent cost is derived from the May 2023 Department of Labor, Bureau of Labor Statistics (BLS), using the median hourly wage rate for a Management Analyst 13-1111 of \$47.80, plus an overhead rate of 29.4% ([Employer Costs for Employee Compensation – June 2023](#)) for a fully burdened wage rate of \$47.80 + \$14.05 = \$61.85.

¹⁵ 125 new awardees submit each quarter – 125 x 4 = 500 respondents.

¹⁶ 216 existing awardees submit each quarter – 216 x 4 = 864 respondents.

Form Name	Form Number	Grant Activity /Process	Respondent Universe (A)	Average Time per Response (in hours) (B)	Total Annual Burden Hours (C = A * B)	Total Cost Equivalent in U.S. dollar (D = C * wage rates)
Certification of Compliance or Non-Compliance with Buy America Requirements for Steel, Iron, Construction Materials, and Manufactured Products being produced by Awardee (narrative request)	Narrative Request	Buy America Component	15	4	60	\$3,711.00
Certification of Compliance with Buy America for Rolling Stock (narrative request)	Narrative Request	Buy America Component	1	62	62	\$3,834.79
Waivers – Requests/ Applications for Waivers, excluding FRA Form 229 (narrative request)	Narrative Request	Buy America Component	15	80	1,200	\$74,220.00
Awardee Investigations (including FRA initiated investigations)	Narrative Request	Buy America Component	3	333	999	\$61,788.15
Awardee direct reply to FRA after request to conduct investigation of bidder/offeree (narrative request)	Narrative Request	Buy America Component	2	1	2	\$123.70
Additional Documents to FRA from Awardee/Investigated Party (narrative request)	Narrative Request	Buy America Component	1	4	4	\$247.40
Transmission of Awardee/Bidder/Offeree Reply to Petitioner (narrative request)	Narrative Request	Buy America Component	1	4	4	\$247.40
Awardee/Investigated Bidder/Offeree response to Petitioner Comment (narrative request)	Narrative Request	Buy America Component	1	8	8	\$494.80
Written request to FRA for information bearing on substance of investigation which has been submitted by petitioner, interested parties, or awardees (narrative request)	Narrative Request	Buy America Component	1	4	4	\$247.40
Detailed Statement to FRA Regarding Confidentiality of Previously Submitted Information to Agency (narrative request)	Narrative Request	Buy America Component	1	8	8	\$494.80
Awardee Determination to make award before	Narrative Request	Buy America	1	40	40	\$2,474.00

Form Name	Form Number	Grant Activity /Process	Respondent Universe (A)	Average Time per Response (in hours) (B)	Total Annual Burden Hours (C = A * B)	Total Cost Equivalent in U.S. dollar (D = C * wage rates)
resolution of investigation one of these sections specified reasons (narrative request)		Component				
Notification to FRA by Awardee to make award during pendency of investigation (narrative request)	Narrative Request	Buy America Component	1	1	1	\$61.85
Request to FRA for Reconsideration of Initial Decision by Party Involved in Investigations (narrative request)	Narrative Request	Buy America Component	1	80	80	\$4,948.00
Pre-Award Audit (narrative request)	Narrative Request	Buy America Component	1	33	33	\$2,041.05
Final Contract between Awardee and Bidder/Offeror (narrative request)	Narrative Request	Buy America Component	1	16	16	\$989.60
Post Award Audit (narrative request)	Narrative Request	Buy America Component	1	256	256	\$15,833.60
Rolling Stock Domestic Content Improvement Plans (narrative request)	Narrative Request	Buy America Component	1	120	120	\$7,422.00
Categorical Exclusion (Worksheet)	FRA F 6180.217	Awards & Maintenance	75	156	11,700	\$723,645.00
Final Performance Report	FRA F 33	Closeout	79	8	632	\$39,089.20
Total ¹⁷			4,762 responses		21,173 hours	\$1,309,550

13. Estimate of total annual costs to respondents.

Other than the hourly wage cost associated in question number 12 above, there are no additional cost to the respondents.

14. Estimate of cost to Federal Government.

The annual estimated cost to the Federal government is \$718,366.10. This estimate is based on burden of previous requests for grant applications; reporting, and closeout documentation; anticipated applications, awards, and reporting requirements.

Form Number	Form Name	Total	Average	Total	Total
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¹⁷Total may not add up due to rounding.

		Annual Responses	Time Per Response (Hours)	Burden Hours	Federal Cost¹⁸
FRA F 6180.251	Applicant Financial Capability Question	1000	2	2,000	\$229,400
FRA F 6180.288	Pre-Award Authority Request Form — Project Sponsors that wish to incur pre-award expenses can apply for pre-award authority. <i>(New Form)</i>	100	4.50	450	\$51,615.00
SF 425	Federal Financial Report	1,592	0.25	398	\$45,650.60
SF 270	Request for Advance or Reimbursement	1000	0.50	500	\$57,350.00
FRA F 6180.252	Payment Summary Spreadsheet	1000	0.25	250	\$28,675.00
FRA F 6180.34	Quarterly Progress Report new and existing awards.	1592	0.50	796	\$91,301.20
FRA F 6180.31	Grant Adjustment Request Form (GARF)	350	3	1,050	\$120,435.00
FRA F 6180.32	Service Outcome Agreement (SOA) Annual Reporting	24	0.25	6	\$688.20
FRA F 6180.229 Narrative Requests	Consolidated Buy American components, including FRA F 229	63	1	63	\$7,226.10
FRA F 6180.217	Categorical Exclusion Worksheet	75	6	450	\$51,615.00
FRA F 6180.33	Final Performance Report	100	3	300	\$34,410.00
Total Annual Burden Hours		6,896 Responses	N/A	6,263 Hours	\$718,366.10

¹⁸ For this revision the wage rate was calculated using the 2023 salary rate of a GS-14, Step 2 @ \$65.54 per hour. An overhead cost of 75% or 1.75 has been added to give a total hourly wage rate of \$114.70 (65.54*1.75).

15. Explanation of program changes and adjustments.

This is a revision to a current collection of information. The current OMB inventory for this information collection shows a total burden of 31,811 hours and 6,570 responses while the requesting inventory estimates a total burden of 21,173 hours and 4,762 responses. Overall, program changes and adjustments decreased burden by 10,638 hours and responses by 1,808. The tables below detail the changes made.

	Burden	Responses
Program Changes	-8,470	-165
Adjustments	-2,168	-,1643
Total	-10,638	-1,808.00

Program Change

FRA will discontinue the use of FRA F 6180.35 Grant Application Form as this form has not been used in several years, and applicants are primarily using the SF-424 Application for Federal Assistance to submit their applications. Discontinued use of FRA F 6180.35 will eliminate unnecessary and duplicative burden for applicants. Responses and burden hours have been adjusted accordingly.

FRA will also discontinue the use of FRA F 6180.229 NIST Manufacturing Extension partnership Supplier Scouting. As part of the implementation of the Build America, Buy America (BABA), federal agencies are required to coordinate with the National Institute of Standards and Technology – Manufacturing Extension Partnership (NIST-MEP) to conduct supplier scouting efforts when federal agencies anticipate needing to waiver either BABA or Buy America requirements for federally funded projects. The NIST-MEP has requested that federal agencies direct project sponsors and the manufacturers of non-compliant components to engage directly with them to conduct this supplier scouting effort. As such, FRA no longer plans to collect information on the FRA F 6180.229 at this time and thus, proposes to remove the burden hours associated with the form, as this burden will be captured by the NIST-MEP.

FRA proposes to add new form FRA F 6180.288. The purpose of FRA F 6180.288 is to allow recipients who would like to incur eligible pre-award costs to request pre-award authority from FRA by submitting a standardized form. This form streamlines the information collection process and FRA’s subsequent review of the request. The form also directs the recipient to confirm that it understands that pre-award costs are considered at-risk until the grant agreement has been executed, and that FRA will authorize such pre-award costs only to the extent such costs are allowable under the terms of the grant agreement.

Form Name and Number	Total Annual Responses			Total Annual Burden Hours		
	Previous Submission	Current Submission	Difference	Previous Submission	Current Submission	Difference
Grant Application (FRA F 6180.35) <i>(To be discontinued)</i>	250	0	-250	8,500	0	-8,500
NIST Manufacturing Extension Partnership Supplier Scouting (FRA F 6180.229) <i>(To be discontinued)</i>	15	0	-15	270	0	-270
Pre-Award Authority Request Form — Project Sponsors that wish to incur pre-award expenses can apply for pre-award authority. (FRA F 6180.288) <i>(New Form)</i>	0	100	100	0.00	300.00	300.00
Total	265 Responses	100 Responses	-165	8,500 Hours	300 Hours	-8,470

FRA Adjustments

Additional Grant funding authorized by the Bipartisan Infrastructure Law (BIL) has significantly increased grant applications and FRA has made adjustments that more accurately reflect the estimated number of submissions over this three-year collection period. With this submission FRA is also correcting the previously reported burden hours for the Standard Forms. After a thorough review, FRA has determined that the previously reported burdens, associated with the SF were included as part of the total estimated burden hours and instead should have been reported under the assigned Host Agency OMB control number. Accordingly, FRA has removed the previously reported burden hours associated with the Standard forms from this ICR renewal submission.

The adjustments in the table below are a more accurate reflection of anticipated responses based on data from the previous three-year collection period and the additional grant funding FRA has received.

Form Name and Number	Total Annual	Total Annual
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	Responses			Burden Hours		
	Previous Submission	Current Submission	Difference	Previous Submission	Current Submission	Difference
Application for Federal Assistance (SF 424)	250	0	-250	275	0	-275
Budget Information for Non-Construction Programs (SF 424A)	75	0	-75	225	0	-225
Assurances for Non-Construction Programs (SF 424 B)	75	0	-75	19	0	-19
Budget Information for Construction Programs (SF 424 C)	175	0	-175	525	0	-525
Assurances for Construction Programs (SF 424 D)	175	0	-175	44	0	-44
Disclosure of Lobbying Activities (SF LLL)	250	0	-250	43	0	-43
Applicant Financial Capability Questionnaire FRA F 6180.251)	168	1000	832	336	2,000.00	1,664.00
FRA Assurances and Certifications Regarding Lobbying; Debarment, Suspension and Other Responsibility Matters and Drug-Free Workplace Requirements (FRA F 6180.30)	250	1000	750	63	250.00	187
Federal Financial Report (125 new awardees submit each quarter; 125x4=500) (SF 425; new awards)	500	0	-500	750	0	-750
Federal Financial Report (216 existing awardees submit each quarter; 216x4=864) (SF 425;	864	0	-864	1,296.00	0	-1,296

existing recipients)						
Request for Advance or Reimbursement (SF 270)	860	0	-860	860.00	0	-860
Certification of Compliance or Non-Compliance with Buy America Requirements for Steel, Iron, Construction Materials, and Manufactured Products being produced by Awardee (narrative request)	15	15	0	45.00	60.00	15.00
Transmission of Awardee/Bidder/Offeror Reply to Petitioner (narrative request)	2	1	-1	1.00	4.00	3.00
Total	3,659 Responses	2,016 Responses	-1,643	4,482 Hours	2,314 Hours	-2,168

16. Publication of results of data collection.

FRA has no plans to publish the collected information.

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

FRA is not seeking approval not to display the expiration date for OMB approval.

18. Exception to certification statement.

FRA does not request any exceptions to the certification statement.

APPENDIX:

1. SF-424 Application for Federal Assistance
2. SF-424 A Budget Information - Non-Construction Programs
3. SF-424 B Assurances - Non-Construction Program
4. SF-424 C Budget Information - Construction Programs
5. SF-424 D Assurances - Construction Programs
6. SF-LLL Disclosure of Lobbying Activities
7. FRA F 6180.30 Assurances and Certifications Regarding Lobbying; Debarment, Suspension and Other Responsibility Matters and Drug-Free Workplace Requirements
8. FRA F 6180.34 Quarterly Progress Report (Revised)
9. FRA F 6180.31 Grant Adjustment Request Form (Revised)
10. SF 425 Federal Financial Report
11. SF-270 Request for Advance or Reimbursement
12. FRA F 6180.32 Service Outcome Agreement Annual Reporting (FRA Template)
13. FRA F 6180.33 Final Performance Report (FRA Template)
14. FRA F 6180.217 Categorical Exclusion Worksheet
15. FRA F 6180.251, Applicant Financial Capability Questionnaire
16. FRA F 6180.252 Payment Summary Spreadsheet
17. FRA F 6180.288 Pre-Award Authority Request (New form)