Department of the Treasury Information Collection Request – Supporting Statement Coronavirus Economic Relief for Transportation Services (CERTS) OMB No. 1505-0273

A. Justification

1. <u>Circumstances necessitating the collection of information</u>

On December 27, 2020, the President signed the Consolidated Appropriations Act, 2021 (the "Act"). Division N, Title IV, Subtitle B, Section 421 of the Act provides \$2 billion for the U.S. Department of the Treasury ("Treasury") to provide grants to eligible providers of transportation services ("Recipients") under the Coronavirus Economic Relief for Transportation Services ("CERTS") Program. Recipients include motorcoach companies, school bus companies, passenger vessel companies, and pilotage companies. Under Section 421 of the Act, Recipients must demonstrate significant revenue losses as a result of COVID-19, and must use grant funds for payroll costs and for other eligible operating expenses. At this point, all funds have been distributed and compliance reporting has been completed.

According to the CERTS grant agreement, grantees must keep records pertinent to the receipt of the Funds and compliance with the terms and conditions of the Grant Agreement for a period of three years after all funds have either been expended or returned to Treasury and make them available upon request for audit purposes.

The final CERTS grantee expended all funds as of December 31, 2022, and as such, the latest possible date for record retention is December 31, 2025.

2. Use of the data

The information reported will allow Treasury to verify that grantees are in compliance with the grant agreements. Treasury will also use the self-reported information on use of funds to track the amount of funds expended, including the breakdown of how funds are used in different eligible categories. This information will help both with tracking compliance and assessing program impacts.

3. <u>Use of information technology</u>

There are no more reporting requirements. Grant recipients maintain records in the format of their choosing, however electronic records are preferred.

4. Efforts to identify duplication

Records retained are specific to recipients' participation in the CERTS program and not duplicative of any other requirements.

5. <u>Impact on small entities</u>

This collection of information will minimally affect small entities. Grant recipients have the flexibility to maintain records in the manner of their choosing.

6. <u>Consequences of less frequent collection and obstacles to burden reduction</u>

Grant recipients will only be required to make records available to Treasury in the case of an audit to evaluate the Grantee's compliance with the terms of the Grant Agreement and ensure that the funds were used for their designated purpose.

7. <u>Circumstances requiring special information collection</u>

There are no special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

8. <u>Solicitation of comments on information collection and justification for expedited processing</u> <u>pursuant to 5 C.F.R. § 1320.13</u>

On December 26, 2024, Treasury published a notice in the *Federal Register* at 89 FR 105177, soliciting public review and comment for a 60-day period. Treasury received no comments from the public in response to this notice.

9. Provision of payments to respondents

No payments or gifts are provided to respondents.

10. Assurance of confidentiality

Information collected will be kept confidential to the extent appropriate and consistent with the Freedom of Information Act and other applicable laws.

11. Justification of sensitive questions

No sensitive questions will be asked of eligible grantees.

12. Estimate of the hour burden of information collection

Reporting	# Respondents	# Responses Per Respondent	Total Responses	Time per response	Total Burden in Hours	Cost to Respondent (\$47.50 per hour*)
CERTS Recordkeeping	1,460	1	1,460	30 minutes	730	\$34,675

Total 1,460 1,460 730

* Bureau of Labor Statistics (BLS), U.S. Department of Labor, Occupational Outlook Handbook, Accountants and Auditors, on the Internet at https://www.bls.gov/ooh/business-and-financial/accountants-and-auditors.htm (visited December 30, 2020). In 2019, the median pay for accounts and auditors was \$34.40/hour. To account for the fully-loaded employer cost of employee compensation, the median pay is increased by 38%, resulting in a fully-loaded wage rate of \$47.50. According to BLS's Employer Cost for Employee Compensation from September 2020 (released on December 17, 2020: https://www.bls.gov/news.release/pdf/ecec.pdf), employers provided 38% of total employee compensation in the form of non-wage compensation (i.e., benefits such as paid leave, health insurance, etc.) for state and local government workers.

13. Estimated total annual cost burden to respondents

There are no annualized capital/startup costs for the Recipients to maintain records.

14. Estimated cost to the federal government.

There are no costs to the federal government for this recordkeeping requirement.

15. <u>Reasons for change in burden</u>

At this point, all CERTS funds have been distributed and compliance reporting has been completed. This reduces the burden by 8,030 hours due to agency discretion. This request is to renew the OMB approval for CERTS recordkeeping, which is necessary through Dec 31, 2025.

16. <u>Plans for tabulation, statistical analysis and publication</u>

Treasury plans to publish grant and payment amounts.

17. <u>Display of the expiration date for OMB approval</u>

Treasury requests permission to omit display of the expiration date in order to avoid potential confusion among stakeholders about the acceptance dates of the application and compliance reports.

18. Exceptions to submission requirements

There are no exceptions to the submission requirements.

Part B. Describe the use of statistical methods such as sampling or imputation.

This collection does not employ statistical methods.