

Department of Transportation (DOT)

Federal Highway Administration

The Supporting Statement A

Site Assessment Report- Detailed Damage Inspection Report

OMB Control No. 2125-XXXX

Introduction: The Federal Highway Administration (FHWA) respectfully requests review and approval from the Office of Management and Budget (OMB) for a new information collection under the Paperwork Reduction Act (PRA) of 1995 to establish the Site Assessment Report - Detailed Damage Inspection Report (DDIR).

Part A. Justification.

1. Circumstances that make collection of information necessary:

The Detailed Damage Inspection Report (DDIR) is an official document prepared under the FHWA's Emergency Relief (ER) Program, authorized by Title 23 of the United States Code (23 U.S.C. 125). The purpose of the DDIR is to provide a thorough assessment of roadway and bridge damages caused by natural disasters or catastrophic events, such as floods, hurricanes, and earthquakes. The completed report is necessary to serve as the foundation for determining the eligibility of a site under the ER program and developing the required Program of Projects.

This information collection supports the DOT Strategic Goals of Safety and Mobility. By establishing a formalized reporting mechanism to quickly assess and categorize damage to critical highway infrastructure, the FHWA can rapidly deploy Emergency Relief funds to restore safe and reliable transportation networks following catastrophic events.

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

The information is collected via the DDIR form (Form FHWA-1547) and includes specific site locations, roadway classifications, detailed descriptions of observed damage, and supporting documentation such as photographs, maps, inspection notes and proposed scope of work. It also captures cost estimates for emergency and permanent repairs.

Respondents include 50 State Departments of Transportation (DOTs), local and state governments, the District of Columbia, the Commonwealth of Puerto Rico, and four United States territories.

The FHWA uses this information to establish site eligibility under the ER program, evaluate the potential for resilience improvements, and ensure compliance with federal requirements that promote cost-effective measures to minimize future damage.

3. Extent of automated information collection:

State DOTs and local respondents are encouraged to utilize electronic data collection methods to complete the DDIR. Agencies use digital field assessment tools, tablets, and geographic

information systems (GIS) to log site locations and upload digital photographs directly into the report. It is estimated that nearly 100% of these data submissions are completed and transmitted electronically. The FHWA allows for full electronic filing via email and secure agency portals, fully complying with GPEA standards.

4. Efforts to identify duplication:

The DDIR is unique to the FHWA Emergency Relief Program. While the Federal Emergency Management Agency (FEMA) also conducts damage assessments for disaster declarations, the FHWA ER program explicitly covers federal-aid highways. The FHWA and FEMA coordinate to ensure overlapping jurisdictions do not result in duplicate reporting for the exact same roadway assets.

5. Efforts to minimize the burden on small businesses:

This information collection does not impact small businesses.

6. Impact of less frequent collection of information:

This information is collected on an as-needed basis, at a frequency of one report per damaged site following an emergency event. Less frequent collection is not possible, as the FHWA is legally required under 23 U.S.C. 125 to determine the eligibility of every specific site before disbursing Emergency Relief funds.

7. Special circumstances:

Not applicable.

8. Compliance with 5 CFR 1320.8:

The 60-day Federal Register notice intended to solicit comments from the public on this information collection was published on September 16, 2025, at [90 FR 44754]. There were 4 comments received.

The first comment: Maryland DOT

- *The full intent of the question is unclear. If the intent of the question is whether FHWA needs information about damage sustained to roads or bridges during a natural disaster, before authorizing Emergency Relief funds, the answer is yes. If the question is asking whether the DDIR as described is the appropriate method to communicate this information, the answer would depend on how the information is currently gathered and communicated. The document is unclear on this. Is there a shortcoming or problem with the existing method(s)? If there is no current formal, standardized method to communicate this information to FHWA when applying for Emergency Relief, then the DDIR seems reasonable.*

Lastly, this DDIR should only be applicable to unusual natural disasters or emergencies and should not be a part of the National Bridge Inspection Standards or the Specifications for the National Bridge Inventory.

- o **FHWA's response:** *This is not a new document requirement but an update to the existing DDIR (Form FHWA-1547). The update provides applicants with clearer guidance on the information needed for FHWA to determine site eligibility*

under the Emergency Relief (ER) program, including proposed resiliency improvements. The DDIR has long been used to document disaster-related damage and support eligibility determinations. The revisions are intended to improve the consistency and completeness of information submitted to FHWA, particularly for proposed resiliency improvements, rather than establish a new reporting requirement. The DDIR is used to assess site eligibility and estimate repair costs and is not part of the National Bridge Inspection Standards or National Bridge Inventory specifications.

- *Two hours for the assessment is too low. To fully provide the information described, ensuring all the requirements and formatting is addressed, gathering photos, maps, providing cost estimates for repairs, and contracting methods - this takes more than 2 hours. Additionally, it is unclear whether the burden is intended to include all the preparation time of visiting the site, gathering the data, taking the photos, developing the cost estimates and repair plans. To do all of this could take weeks, or much more depending on the nature of the situation. If the intent of the burden is to exclude all this work and simply prepare a report after all of the information is documented, then 4 to 6 hours may be more appropriate. The annual burden listed assumes 56 assessments. It is unclear where this number comes from. If the implication is that a state may see 56 natural disasters or emergencies in one year, it seems high. If the implication is that a natural disaster or emergency could damage multiple facilities, which could each require its own assessment, the number may be reasonable, but the document is unclear on this.*

There needs to be more clarity about how much detail is to be provided for the cost estimate of the emergency repairs and permanent repairs. What level of detail is going to be required? Do they expect bid items since they request a proposed contracting method?

- o **FHWA's response:** *Taking into consideration the time required to conduct site assessments, gather supporting documentation (including photographs, maps, repair information, and cost estimates), prepare a single DDIR, and submit it to FHWA for review, we have increased the estimated burden from 2 hours to 168 hours per DDIR. The initial estimate is only considered burden for the submission and approval of DDIRs, rather than preparation.*

With respect to the annual estimate of 56 assessments, this number represents one potential respondent from each State, the District of Columbia, and U.S. Territories that may utilize the DDIR process. It does not represent the anticipated number of assessments occurring within a single State each year.

Regarding cost estimates, the DDIR is intended to provide preliminary, planning-level estimates. States may develop these estimates using statewide average costs, recent similar projects, existing contracts, historical bid data, or other reasonable methodologies that can be justified. Detailed engineer's estimates or bid items are not required at the DDIR stage because the document is prepared before a project is advertised for bids. The proposed contracting method is included for planning purposes and does not require the development of contract bid schedules.

- *What type of evaluation or documentation is expected to be included in this report for the "potential for resilience improvements, ensuring compliance with federal requirements that promote cost-effective measures to minimize future damage and repair needs"? They appear to expect a lot of detail since the report is to be the "foundation for determining eligibility" for ER program.*

- o **FHWA's response:** *The DDIR is used to determine eligibility of a damaged site and the proposed scope of work under the ER program. For proposed resilience improvements that exceed current standards, applicants should provide documentation demonstrating compliance with 23 USC 125(d)(2)(A)(ii), typically through a cost-benefit analysis or similar economic evaluation. This documentation should support that the proposed resilience measure is cost-effective and would reduce future damage and repair costs compared to restoring the facility to current standards. The level of detail should be sufficient for FHWA to assess eligibility and determine whether the proposed resilience improvement meets ER program requirements.*
- *The number of hours to generate this report seems unrealistic, if it is to include all that is being requested.*
 - o **FHWA's response:** *Taking into consideration the time required to conduct site assessments, gather supporting documentation (including photographs, maps, repair information, and cost estimates), prepare a single DDIR, and submit it to FHWA for review, we have increased the estimated burden from 2 hours to 168 hours per DDIR.*

The Second comment: Virginia DOT

- *The current DDIR is burdensome, repetitive, and can create inconsistencies between state DOTs and FHWA. VDOT recommends streamlining ER funding by using disaster imagery and damage-based estimates to provide funding more quickly, with actual costs reconciled after project completion. They also note that extensive documentation requirements can delay recovery efforts and sometimes outweigh the benefits of the funding received.*
 - o **FHWA's response:** *This comment is not directly related to the DDIR form*
- *VDOT recommends that FHWA factor in additional time in calculating the estimate of the actual burden per assessment. FHWA's estimated burden of 2 hours per each assessment significantly underestimates the actual burden. FHWA's estimate of the number of hours spent per DDIR appears to only include office time spent gathering previously collected data. However, data collection in the field is required to complete a DDIR, and travel times alone are often an hour or more between individual sites, which would greatly increase the estimated burden. FHWA should include an estimate of the time spent collecting data and documentation for the DDIR. The public burden estimates should be based on median time per DDIR for years in which a DDIR was completed; not averages or medians which include years when no DDIR was completed. In VDOT's experience, documentation for each DDIR (site) requires between 20 to 24 hours per assessment. For example, VDOT's experience for the 68 DDIRs related to the Helene storm has been that it took over 1,632 hours (204 days) to complete the 68 DDIRs.*
 - o **FHWA's response:** *Taking into consideration the time required to conduct site assessments, gather supporting documentation (including photographs, maps, repair information, and cost estimates), prepare a single DDIR, and submit it to FHWA for review, we have increased the estimated burden from 2 hours to 168 hours per DDIR.*
- *VDOT recommends that FHWA streamline and standardize the DDIR process by implementing a GIS-based nationwide data collection tool, establishing a consistent national review process, and providing greater FHWA involvement in post-disaster assessments to better understand state burdens. VDOT also suggests developing an ER toolkit with standardized contracts and agreements, allowing geographically related*

DDIRs to be combined to reduce duplication, and enhancing the PIDP system by improving functionality, reducing repetitive uploads, enabling edits and deletions, extending session timeouts, and allowing batch submissions and document uploads.

- o **FHWA's response:** *This comment is not directly related to the DDIR form.*

Additionally, FHWA is working to provide State DOTs with multiple options for conducting damage assessments. The DDIR is one tool available to States that choose to use it. Other available tools include the Policy Information Data Portal (PIDP) and the Mobile Solution for Assessment & Reporting (MSAR). Both platforms enable State DOTs to collect site assessment data and submit it electronically to FHWA.

- *VDOT recommends that FHWA provide clearer guidance on performing permanent repairs alongside emergency repairs to streamline eligibility and approval processes. They also suggest reducing administrative burden by shifting from auditing every DDIR to a sample-based audit approach aligned with State DOT oversight practices, rather than treating each DDIR as a separate audited project.*

- o **FHWA response:** *This comment is not directly related to the DDIR form.*

The third comment: *VDOT submitted the same comments twice.*

The fourth comment: Anonymous

- *I am requesting Approval for this new agency collection for the Emergency Relief Program and Projects under the Federal Highway Administration, the Secretary of Homeland Security the Department of Defense DOD Resources, the Secretary of Defense, the Office of Management and Budget, the Office of the Chief information Officer, Secretary the Governor of Louisiana, Department of State and the Department of the Treasury, and al I related agencies and departments involved, on my behalf and request to allow for Federal aid authorization from the Highway Trust Fund and the Robert T. Stafford Disaster Relief and Emergency Assistance Act of January 1, 201 6 applicable under the Disaster Relief Acts of 1 970 and 1 974. This will support the Organizational Excellence Strategic Goal for personnel designation and operational needs accordingly. Tre projects for Relief include for adequate debris removal and wreckage under regulations of the Disaster Contract Improvement Act and the Oversight on Debris Removal compliance and indemnification requirements for the relief, assistance, recovery and support to carry out procedures as defined for disaster relief operations to be implemented immediately.*

- o **FHWA response:** *This comment is not directly related to the DDIR form.*

The 30-day Federal Register notice intended to notify the public this information collection was submitted to OMB for review and approval was published on June 23, 2026, at [91 FR 37214]."

9. Payments or gifts to respondents:

Not applicable.

10. Assurance of confidentiality:

This information collection pertains strictly to public roadway and bridge damage and contains no personal identifiable (PII) information.

11. Justification for collection of sensitive information:

Not applicable.

12. Estimate of burden hours for information requested:

The estimated average burden per response is 168 hours. There are 56 respondents (50 State DOTs, local and state governments, District of Columbia, Commonwealth of Puerto Rico, United States territories of American Samoa, Guam, N Marina Is., and the Virgin Islands (4 territories), etc.

Hourly wage rate is based on the BLS median hourly wage for Civil Engineers and Construction/Building Inspectors employed by state and local governments.

Respondents	Annual Responses	Burden Hours per Response	Total Annual Burden Hours	Hourly Wage Rate	Total Annual Cost
State/Local/Territory DOTs	56	168	9,408	\$47.88 ¹	\$450,455.04

13. Estimate of total annual costs to respondents:

There are no capital, start-up, or operation/maintenance costs to the respondents associated with this information collection. All costs are accounted for in the hour burden shown in question 12.

14. Estimate of cost to the Federal government:

The primary cost to the Federal Government involves FHWA division office staff reviewing and processing the submitted DDIRs to establish site eligibility.

Calculation: 168 burden hours (assuming 1 hour of review per 56 total reports to match respondent volume estimates or slightly less depending on disaster size) x \$43.57²/hour (Based on OPM General Schedule salary for a GS-13 equivalent federal employee) = \$409,906.56 estimated annual cost to the Federal Government.

15. Explanation of program changes or adjustments:

This is a new information collection. There are no changes or adjustments.

16. Publication of results of data collection:

The individual Site Assessment Reports are not published. However, aggregated cost data from approved DDIRs may be used to report on the overall allocation and disbursement of Emergency Relief funds nationwide.

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

The FHWA is not seeking an exemption. The OMB control number and expiration date will be displayed appropriately on the collection instruments.

¹ <https://www.bls.gov/ooh/architecture-and-engineering/civil-engineers.htm>

² https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/26Tables/pdf/GS_h.pdf

18. Exceptions to certification statement:

There are no exceptions to the certification statement.