

DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION

JUSTIFICATION STATEMENT
All Stations Accessibility Program (ASAP)
(OMB Control No. 2132-0582)

ABSTRACT

This submission requests approval from the Office of Management and Budget (OMB) for an extension, without change, of the currently approved information collection under OMB Control Number 2132-0582, *All Stations Accessibility Program (ASAP)*. Initiated in 2022 under an emergency approval following enactment of the Infrastructure Investment and Jobs Act, the ASAP program provides competitive funding to assist transit agencies in capital projects that repair, improve, modify, retrofit, or relocate station infrastructure to ensure all public areas are accessible to individuals with disabilities, including those who use wheelchairs. Since its launch, the program has received broad and enthusiastic support from both transit agencies and the public, and FTA has issued two rounds of funding opportunities. The previously estimated number of respondents and associated burden hours for application and post-award activities have proven accurate, and there have been no programmatic or statutory changes to the program. This 3-year renewal request reflects no changes to the underlying information collection; however, the estimated cost to respondents has been updated to incorporate the latest labor rates published by the U.S. Bureau of Labor Statistics (BLS), and the estimated cost to the federal government has been revised to align with the 2026 General Schedule (GS) pay rates issued by the U.S. Office of Personnel Management (OPM).

A. Justification

1. EXPLAIN THE CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY. IDENTIFY ANY LEGAL OR ADMINISTRATIVE REQUIREMENTS THAT NECESSITATE THE COLLECTION.

The collection of this information is necessary because access to public transportation was one of the earliest advocacy issues for people with disabilities as they sought to find ways to live their best lives in our Nation's communities. Although the Americans with Disabilities Act was passed over thirty years ago, and there has been progress in public transportation accessibility, many people with disabilities still don't have access to reliable public transportation. Inaccessibility is a significant hurdle for riders using rail systems built before 1990, known as legacy systems. Over 900 of these transit legacy stations are still not fully accessible today. The All Stations Accessibility Program (ASAP) will provide support for transit agencies to repair, improve, modify, retrofit, or relocate infrastructure of stations or facilities for passenger use. Planning activities by transit agencies seeking to improve accessibility also qualify for ASAP funds.

Authority

Division J of the Bipartisan Infrastructure Law (enacted as the Infrastructure Investment and Jobs Act, Pub. L. 117-58) authorized ASAP to provide funding to States (including territories

and Washington, D.C.) and local governmental authorities to help finance capital projects to upgrade the accessibility of legacy rail fixed guideway public transportation systems (e.g., subway, commuter rail, light rail) for persons with disabilities, including those who use wheelchairs, by increasing the number of existing stations or facilities, such as outdoor light-rail boarding and alighting areas, that are fully accessible.

Eligible Recipients:

Eligible applicants for ASAP include designated recipients that operate or allocate funds to inaccessible pre-ADA or “legacy” rail fixed guideway public transportation systems, and States (including territories and Washington, D.C.) and local governmental entities that operate or financially support legacy rail fixed guideway public transportation systems and corresponding legacy stations/facilities. The law limits ASAP to legacy rail fixed guideway public transportation systems with stations or facilities for passenger use that are not already accessible to and usable by persons with disabilities, including wheelchair users. To be considered eligible, applicants must be able to demonstrate the requisite legal, financial, and technical capabilities to receive and administer Federal funds under this program.

Eligible Activities:

- Projects to repair, improve, modify, retrofit, or relocate infrastructure of legacy stations or facilities for passenger use, including load-bearing members that are an essential part of the structural frame, to meet or exceed current ADA standards for buildings and facilities; or
- Planning related to pursuing public transportation accessibility projects, assessments of accessibility, or assessments of planned modifications to legacy stations or facilities for passenger use.
- An eligible entity may not use a grant awarded under this program to upgrade a station or facility for passenger use that is already accessible to and usable by people with disabilities, including individuals who use wheelchairs, according to standards for new construction under Title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12131 et seq.)
- Eligible activities apply only to legacy stations or facilities that are currently inaccessible.

Information Collected

Generally, FTA’s collection of information from recipients is in two stages; the application stage, and the post funding award/project management stage.

Application Stage

FTA must determine the applicant's eligibility to receive program funds. FTA must know: a) who the applicant is; b) for what purpose the funds are requested; and c) the amount of federal funds requested or needed.

FTA will use an online, web-based grant management system to collect the following information:

- Applicant name
- Unique Entity Identifier
- Key contact information (including contact name, address, email address, and phone)
- Congressional district(s) where project will take place
- Project information (including title, an executive summary, and type)
- A detailed description of the need for the project
- A detailed description on how the project will support the Program’s objectives
- Evidence that the project is consistent with local and regional planning documents
- Evidence that the applicant can provide the local cost share
- A description of the technical, legal, and financial capacity of the applicant
- A detailed project budget

- An explanation of the scalability of the project
- Details on the local matching funds
- A detailed project timeline
- A system map and listing of accessible vs inaccessible stations, and which station(s) they are proposing to upgrade.

Project Management Stage

The reporting requirements under this stage are necessary to ensure the proper and timely expenditure of federal funds within the scope of the approved project. The requirements comply with the Uniform Guidance and are contained in FTA Circular 5010.1E, “Grant Management Requirements” and also may also be included in sections of the grant contract.

- **MILESTONE PROGRESS REPORTS (MPR).** These narrative reports define the level of activity for each project element during the reporting period. Delays, problems, and milestone achievements are reported to FTA. The reports greatly reduce the need for on-site visits by staff.

Cost Allocation Plan. These narrative reports are required of State or local agencies desiring reimbursement for indirect administrative expenses incurred in connection with a capital grant. The Cost Allocation Plan is necessary to properly determine those indirect costs attributable to capital grants.

- **FEDERAL FINANCIAL REPORTS (FFRS).** These quantitative reports provide a financial picture of project activity. The reports include information regarding obligations, payments, receipts, and other pertinent financial data required to ensure proper expenditure of federal funds

Reports of Significant Events. Unforeseen events that impact the schedule, cost, capacity, usefulness or purpose of the project should be reported to FTA immediately after detection and then reflected in the next quarterly progress report.

Pre-award and Post-delivery Rolling Stock Reviews. The reviews are required to be performed by FTA grantees purchasing rolling stock. These reviews are intended to ensure compliance with various requirements, such as Buy America, and to detect any vehicle defects while the vehicle is under warranty. Grantees certify compliance with the review requirements under the implementing rule that was published in September 1991.

Project Management Plan Updates. As major construction projects progress, the original project management plans need revisions and updates. Updates must include project budget; project schedule; financing, both capital and operating; ridership estimates, including operating plan; and, when appropriate, the status of local efforts to enhance ridership when estimates are contingent, in part, upon the success of such efforts to be made.

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 information will be collected via the Transit Award Management System (TrAMS), FTA's on-line fillable platform to award and manage federal grants. TrAMS was created to provide greater efficiency and improved transparency and accountability. The initial application and follow-up reports are submitted to the cognizant program office, usually within an FTA regional office, to determine the recipient's eligibility for funding and, subsequently, the grantee's progress in implementing and completing project activities. The reports assure FTA of a level of management of risks. Also, the information submitted ensures FTA's compliance with applicable federal laws, and the Common Grant Rule. In addition, without these reports, significant resources and manpower would be necessary to conduct on-site inspections.

3. CONSIDERATION OF IMPROVED INFORMATION TECHNOLOGY TO REDUCE BURDEN AND ANY TECHNICAL OR LEGAL OBSTACLES TO REDUCING BURDEN.

FTA's electronic grant making and management system is a paperless, electronic grant application, review, approval, acceptance, and management process. 100 percent of FTA's grant applications are submitted electronically. FTA also anticipates that approximately 100 percent of the periodic reports that grantees are required to submit will be sent electronically on the same platform. Grantees are also encouraged to use the electronic system for signature of annual certifications and assurances.

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.

The application and reports are project specific, and the information is not available elsewhere. There is no duplication.

5. METHODS USED TO MINIMIZE BURDEN ON SMALL BUSINESSES OR OTHER SMALL ENTITIES.

The information collected does not involve small businesses.

6. CONSEQUENCES TO FEDERAL PROGRAMS OR POLICY ACTIVITIES IF INFORMATION WAS NOT COLLECTED OR COLLECTED LESS FREQUENTLY, AS WELL AS ANY TECHNICAL OR LEGAL OBSTACLES TO REDUCING THE BURDEN.

Information is collected during the application stage to ensure only eligible recipients receive federal funding under this program. If federal financial reports or milestone reports were not collected or required less frequently, additional site visits by agency staff would be needed to ensure compliance with program objectives.

7.SPECIAL CIRCUMSTANCES THAT REQUIRE THE COLLECTION TO BE CONDUCTED IN A MANNER INCONSISTENT WITH 5 CFR 1320.6.

The information collected is consistent with the guidelines in 5 CFR 1320.6.

8.EFFORTS TO CONSULT WITH PERSONS OUTSIDE THE AGENCY TO OBTAIN THEIR VIEWS.

A 60-day Federal Register notice was published on December 23, 2025 FR. 90 No. 244 Vol. 60230 soliciting comments prior to submission to the Office of Management and Budget (OMB). No comments were received related to the PRA or collection of information, burden, respondents, etc. The comments was sent to the for North Central Independent Living Service, Inc. and was in support of the grant program and it's need in mass transit and especially rural areas. They also made suggestions to expand the program, including initiating something similar with passenger rail (FRA). A 30-day Federal Register notice was published on April 23, 2026 Vol.91 No.78 pg. 21869. Both Federal Register notices have been included with this OMB submittal in ROCIS.

FTA frequently engages in stakeholder outreach including webinar series and site visits to projects and transit agencies by the regional staff. Since the program launch there have been two rounds of funding opportunities and FTA has held several webinars [FTA-FY26-ASAP-NOFO-Webinar 0.pdf](#) to support each funding announcement and help agencies understand the process and encourage their feedback on the time associated with applying and post award requirements.. FTA will continue to seek additional outreach opportunities with our stakeholders.

9. EXPLAIN ANY DECISION TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS, OTHER THAN REMUNERATION OF CONTRACTORS OR GRANTEES.

No payment is made to respondents.

10.DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED RESPONDENTS.

There is no assurance of confidentiality regarding these submissions.

11.ADDITIONAL JUSTIFICATION FOR QUESTIONS OF A SENSITIVE NATURE.

None of the information is of a sensitive nature.

12.ESTIMATE OF THE HOUR BURDEN OF THE COLLECTION; AND ANNUALIZED

TOTAL RESPONDENTS: **20**

TOTAL RESPONSES: **40**

(20 application submissions + 20 project-management submissions)

TOTAL ANNUAL BURDEN HOURS: **280**

(Application = $20 \times 10 \text{ hr} = 200 \text{ hr}$; Project Management = $20 \times 4 \text{ hr} = 80 \text{ hr}$; $200 + 80 = 280$)

COST TO RESPONDENTS: **\$14,095**

| Requirements | #Annual submissions | Burden hours per submission | Total burden hours |
|--|----------------------------|------------------------------------|---------------------------|
| Application Stage | | | |
| <u>Includes all the following:</u> | 20 | 10 | 200 |
| <ul style="list-style-type: none"> • Authorizing/Resolution • Opinion of Counsel • Project Description • Project Budget • Project Justification • Public Hearing Notice • Project Milestones • List of Labor Unions • Environmental Exhibit | | | |
| Project Management Stage | | | |
| Milestone Progress Reports (MPRs) 8 16,696 Financial Status Report (FFRs) <ul style="list-style-type: none"> • Cost Allocation Plans • Project Management Plan Updates | 20 | 4 | 80 |
| Grand Total, Application and Project Management | 40 responses | 14 burden hrs. | 280 burden hrs. |

Estimate of the cost to respondents:

The number and complexity of applications submitted each year vary considerably and there is a wide variance in the level of effort required. A majority of applications are, however, simple and straightforward. The figures below are representative of a straightforward application meeting all of the criteria for federal funding.

FTA estimates that the average salary of the respondent, typically an Urban/Regional Planner (occupation code 19-305; [Urban and Regional Planners](#) has a median hourly wage of \$50.34 (hourly salary of \$39.33 weighted with a 28 percent benefits adjustment of \$11.01) according to the data on the Bureau of Labor Statistics website.

Application Stage

Based on feedback from two competitive funding rounds (2022 and 2025), FTA’s original assumption that each applicant requires approximately 10 personnel-hours to develop and submit an application remains accurate. Those awardees in those rounds ranged from 8 to 15 per round, and because eligibility is limited to a small number of legacy stations, FTA expects modest program growth and continues to project about 20 applications annually over the next three years. Therefore, FTA retains the estimate of 20 applications per year, for a total of 200 application burden hours (20 applications × 10 hours each). At an average respondent labor rate of \$50.34 per hour, the application-stage cost is 200 hr × \$50.34/hr = **\$10,068**.

Project Management Stage

Based on feedback from respondents during the ASAP informational webinars, FTA estimates that it will take approximately 4 personnel-hours to submit the Milestone/FFR reports annually. Since the same occupation listed above (Urban/Regional Planner: occupation code 19-3051; [Cost Estimators \(bls.gov\)](https://www.bls.gov) and 20 respondents would submit these reports, it is estimated that the total cost for the project management stage is **\$4,027**. Project management stage cost: 80 hr × \$50.34/hr = \$4,027

Total annual cost to respondents: 280 hr × \$50.34/hr = **\$14,095**

13. ESTIMATE OF TOTAL ANNUAL COST BURDEN TO RESPONDENTS OR RECORDKEEPERS RESULTING FROM THE COLLECTION OF INFORMATION (NOT INCLUDING THE COST OF ANY HOUR BURDEN SHOWN IN ITEMS 12 AND

There is no additional cost beyond that shown in items 12 and 14.

14. ESTIMATE OF THE ANNUALIZED COST TO THE FEDERAL GOVERNMENT.

Total Cost to the Federal Government (including IT cost): \$58,519

Application Stage:

It will take approximately 10 person-hours to review each application received by FTA. It should be noted that this figure assumes that the application is: 1) complete, 2) fundable and 3) non-controversial. More complex projects or programs of projects would consume additional time. We estimate that the average grade level of the reviewers is GS-13/Step 5, paid \$66.14 per hour with locality pay according to the 2026 OPM Federal Pay Scale [DCB h.pdf](#). FTA maintains that a single federal employee (GS-13, Step 5) is assigned to this program and spends the full 200 hours on application review for a total cost of \$13,228 (Application stage: 200 hr × \$66.14 = \$13,228).

Project Management Stage:

A review of the project management reports submitted during a year should be completed within 1 hour by a GS-13/Step 5 according to the 2026 Federal Pay Scale [DCB h.pdf](#) (average salary, \$66.14 per hour). There are approximately 80 hours associated with post-award documents and financial reports submitted during a year. The cost to the federal government is \$5,291 (Project management stage: 80 hr × \$66.14 = \$5,291.20).

IT/System Maintenance:

Approximately 20% of the TrAMS IT support contract is dedicated to system maintenance relevant to federal grant review. Given this, the costs associated with system maintenance for an individual FTA grant program are estimated at approximately \$40,000 annually.

Total:

Total federal cost for application, project management stages and IT is **\$58,519** (\$13,228 application stage + \$5,291 project management stage + \$40,000 IT system maintenance costs).

15. EXPLAIN REASONS FOR CHANGES IN BURDEN, INCLUDING THE NEED FOR ANY INCREASES

This is an extension of a previously approved information collection without changes. FTA has not applied any substantive changes or adjustments from the previous submission.

16. PLANS FOR TABULATION AND PUBLICATION FOR COLLECTIONS OF INFORMATION WHOSE RESULTS WILL BE PUBLISHED.

FTA does not plan to publish the results of the information collected for statistical use.

17. IF SEEKING APPROVAL NOT TO DISPLAY THE EXPIRATION DATE FOR OMB APPROVAL, EXPLAIN THE REASONS.

There is no reason not to display the expiration date of OMB approval.

18. EXPLAIN ANY EXCEPTIONS TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19 OF OMB FORM 83-I.

No exceptions are stated.