

DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION

SUPPORTING STATEMENT
49 U.S.C. SECTIONS 5337
STATE OF GOOD REPAIR PROGRAM
(OMB# 2132-0577)

ABSTRACT

This supporting statement is associated with a request for a three-year extension, without change, of a currently approved Information Collection (IC). Since the previous renewal in May 2023, there have been no programmatic or statutory changes affecting the scope or requirements, respondent universe or burden hours. The document has been revised throughout the document and also includes updated labor costs, specifically incorporating the new Office of Personnel Management (OPM) salary rates for Federal employees and the May 2025 updated wage rates published by the Bureau of Labor Statistics (BLS).

1. CIRCUMSTANCES THAT MAKE THE COLLECTION NECESSARY.

The SGR Grants Program, provides financial assistance to public transit agencies operating rail fixed-guideway and high-intensity motorbus systems. Funds support the maintenance, replacement, and rehabilitation of capital assets, as well as the development and implementation of Transit Asset Management (TAM) plans.

The program aims to ensure public transit operates safely, efficiently, and reliably to improve mobility and encourage economic development. Eligible recipients are state and local governmental authorities in urbanized areas with qualifying fixed guideways and/or motorbus systems operating for at least seven years. Projects are generally funded at 80% Federal and require a 20% local match. Also included under this program is the 5337(f) Competitive Grants for Rail Vehicle Replacement (Rail Program) with similar cost-share requirements, but a maximum Federal share of 50% of the net project cost.

The collection of information is dictated by 49 U.S.C. Sections 5337, 49 CFR Part 18 (the Common Grant Rule), and the need for prudent administration of Federal grant funds. The Federal Transit Administration (FTA) must review applications for grantee and project eligibility and monitor approved projects to ensure timely expenditure of Federal funds.

The required information is submitted in two stages:

1. Application Stage

FTA must determine the applicant's eligibility and the project's purpose, scope, and funding needs, ensuring compliance with Federal laws and FTA Circular FTA C 9050.1A which was updated on November 1, 2024.

Required application documents include:

- **Authorizing Resolution and Opinion of Counsel:** Required by 49 U.S.C. 1602(a)(2)

- (A) to confirm the applicant's representation and legal capacity to undertake the project.
- **Project Budget:** Details required Federal funds, local match, and specific costs.
- **Project Description:** Enables FTA to confirm the project is allowable under SGR's limited categories and the Common Grant Rule.
- **Project Milestone Schedule:** Provides key dates for major activities, such as bid award and project completion.
- **List of Labor Unions:** Used by the Department of Labor for the labor protective arrangements certification (49 U.S.C. Section 5333(b)).
- **Environmental Exhibit:** Documentation for project classification per FHWA/FTA Environmental Procedures (23 C.F.R. Parts 771.115 and 771.117).
- **Transit Asset Management Plan:** Certification of compliance with 49 CFR 625, requiring plans that include capital asset inventories, condition assessments, and investment prioritization.
- **Annual Certifications and Assurances:** Required by Federal law before a grant award.
- **Responses to Evaluation and Selection Criteria:** Required for the discretionary Rail Vehicle Replacement Program (5337(f)) applicants and published in the Notice of Funding Opportunity (NOFO).

2. Project Management Stage

These requirements ensure the proper and timely expenditure of Federal funds within the approved scope, complying with the Common Grant Rule and FTA Circular 5010.1F updated in 2024. They also greatly reduce the need for FTA staff on-site visits.

Annual reporting requirements include:

- **Milestone/Progress Reports (MPR):** Narrative reports detailing activity, milestone achievements, delays, and problems.
- **Cost Allocation Plan:** Required for State or local agencies seeking reimbursement for indirect administrative expenses connected to a capital grant.
- **Federal Financial Reports (FFRs):** Quantitative reports on obligations, payments, and receipts for proper financial oversight.
- **Reports of Significant Events:** Immediate reporting of unforeseen events impacting schedule, cost, capacity, or usefulness of the project.
- **Pre-award and Post-delivery Rolling Stock Reviews:** Required for grantees purchasing rolling stock to ensure compliance (e.g., Buy America) and detect defects.
- **Project Management Plan Updates:** Revisions to the original plans for major construction projects, including updates to budget, schedule, financing, and ridership estimates.

2. HOW, BY WHOM, AND FOR WHAT PURPOSE THE INFORMATION IS TO BE USED AND CONSEQUENCES IF THE INFORMATION IS NOT COLLECTED.

The information is collected and used by the Federal Transit Administration (FTA) program office, primarily through a regional office, via FTA's electronic grant making and management system, to determine the applicant's eligibility for funding and monitor the grantee's subsequent progress in implementing and completing project activities. The reports assure FTA of a level of risk management and ensure compliance with applicable

Federal laws and the Common Grant Rule. For the competitive discretionary program, applications are submitted to the program office for selection consideration before the standard reporting begins. If this information is not collected, FTA would need to use significant resources and manpower to conduct on-site inspections to verify eligibility and project progress.

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

The Federal Transit Administration (FTA) maximizes the use of information technology to reduce applicant and grantee burden. All applicants selected for a discretionary grant allocation, as well as all grantees for formula grants, utilize FTA's electronic grant making and management system (TrAMS). TrAMS is a paperless system that manages the electronic application, review, approval, acceptance, and management process for all grants and approximately 100 percent of the required periodic reports under the project management stage. Grantees are also encouraged to use TrAMS for the electronic signature of annual certifications and assurances. The use of TrAMS streamlines the process with point-and-click capability, menus, and selection choices designed to significantly reduce the amount of information a user needs to input.

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 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. However, grantees reporting from smaller urbanized areas (urbanized areas with populations of less than 200,000) can submit Milestone Progress Reports and Federal Financial Reports on an annual basis rather than on the quarterly basis formerly required.

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.

If these and other reports were required less frequently, additional site visits by agency staff would be required 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 March 26, 2026 Vol. 91 No.58 (page 14748) soliciting comments prior to submission to the Office of Management and Budget (OMB). No comments were received. A 30-day Federal Register notice was published on May 27, 2026 Vol. 91 FR 31519.

FTA consistently engages with our grantees. FTA staff hosts annual webinars with transit providers to allow for two-way communication on updates in the industry and answer any questions or concerns. Our grantees have found this information and engagement with FTA staff to be useful during the application and reporting process. The Federal Transit Administration (FTA) provides regular webinars on Transit Asset Management (TAM) and State of Good Repair (SGR) to help transit agencies maintain capital assets, improve safety, and meet regulatory requirements, with [events updated on their site](#) as of April 2026. These sessions often focus on TAM plan development, capital investment strategies, and reducing the national SGR backlog.

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 COST TO RESPONDENTS.

Respondents: State and local governments
Estimated Annual Number of Respondents: 118
Estimated Annual Number of Responses: 1,097
Estimated Total Annual Burden: 13,729
Frequency: Annual

Requirements	# Annual submissions	Burden hours per submission	Total burden hours
<u>Application Stage includes all of the following):</u>	118 (68 SGR + 50 RVP)	35.93	4,240 (3,740 + 500)
Authorizing/Resolution <ul style="list-style-type: none"> • Opinion of Counsel • Project Description • Project Budget • Project Justification • Project Milestones • List of Labor Unions • Environmental Exhibit 			
<u>Project Management Stage includes all of the following</u>	979 (976 original SGR + 3 RVP)	9.69	9,489 (9,477 original SGR + 12 RVP)
<ul style="list-style-type: none"> • Milestone Progress Report • Reports of Significant Events • Federal Financial Reports • Pre-award/Post Delivery of Rolling Stock • Cost Allocation Plans • Project Management Plan Updates 			
Grand Total, Application and Project Management	1,097		13,729

Estimated Cost to Respondents

Although various personnel are involved in the development of an application, the median salary for an Urban and Regional Planner (19-3051) according to BLS [Occupational Employment and Wage Statistics Profiles](#) is \$45.55 per hour plus 28% for fringe benefits equals \$58.30 per hour. The cost below is calculated using a labor rate of \$55.30 per hour.

The cost below is calculated using a labor rate of \$58.30 per hour,

Cost at Application Stage:

- 4,240 total burden hours x \$58.30 per hour = **\$234,472**
- **Cost at Project Management Stage:**
 - 9,489 total burden hours x \$58.30 per hour = **\$524,641**

Grand Total Estimated Annual Cost to Respondents: \$759,113

\$234,472 Application Stage + \$524,641 Project Management Stage = \$759,113

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 14.

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

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

The cost to the federal government is **\$580,757.20**. The cost is based on the 2026 OPM salary table [DCB h.pdf](#) and calculated as follows:

The cost is calculated using a uniform wage rate of **\$66.14 per hour** for both the Application Stage and the Project Management Stage:

Application Stage: Our experience indicates that it takes approximately 50 person-hours to review each application and supporting documents 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. Although reviewed by several different staffers, from secretaries to the Administrator, it is estimated that the average grade level of the reviewers is GS-13 step 5 (including locality pay) paid at \$66.14 per hour. Since FTA receives and reviews approximately 68 applications per year, the cost to the federal government is **\$224,876.00** (50 hours x 68 SGR applications = 3,400 hours x \$66.14). The project management stage RVP discretionary progress reports are less complex and require 10 hours of review per application, which is 500 person hours (10 hours x 50 applications). This federal cost is **\$33,070.00** (500 hours x \$66.14) for the discretionary grant application stage. The combined federal cost of formula and discretionary application review is **\$257,946.00** (\$224,876.00 + \$33,070.00).

Project Management Stage: A review of the progress and other project management reports submitted during a year should be completed within 5 hours by a GS-13.5 at \$66.14. There are approximately 976 progress reports (976 SGR PM Reports + 3 RVP discretionary funds reports) and financial reports submitted during a year. The cost to the federal government is **\$322,811.20** (\$66.14 x 5 hours x 976 reports).

Total cost for application and project management stages is **\$580,757** (\$257,946 application stage + \$322,811 project management stage) for both SGR formula and the RVP discretionary funded programs.

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

There are no programmatic or statutory changes to this program, resulting in a request for an extension without changes to a currently approved information collection. However, as required the supporting statement has been updated to reflect an increase in labor costs for both respondents and federal government because of the updated wages from BLS and the 2026 OPM salary table.

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.