

DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION

SUPPORTING STATEMENT

49 U.S.C. SECTION 5308 Clean Fuels Grant Program

OMB Control No. 2132- 0573

ABSTRACT

This supporting statement is associated with a request for revision of a currently approved information collection. The change in this collection reflects a reduction in burden on the public and federal government due to the Clean Fuels Grant Program being repealed by Congress under the Moving Ahead for Progress in the 21st Century Act (MAP-21). As a result, the application stage and all information collected as part of this process in the program have been eliminated.

A. Justification

1. CIRCUMSTANCES THAT MAKE THE COLLECTION NECESSARY.

The Clean Fuels Grant Program has a two-fold purpose. First, the program was developed to assist nonattainment and maintenance areas in achieving or maintaining the National Ambient Air Quality Standards for ozone and carbon monoxide. Second, the program supported the development and deployment of clean fuel and advanced propulsion technologies for transit buses by providing funding for clean fuel vehicles and facilities.

The Section 5308 Clean Fuels Grant Program was originally initiated as a formula program under the Transportation Equity Act for the 21st Century (TEA-21) in June 1998. However in 2005, Section 3010 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), Pub. L. No. 109-59, 119 Stat. 1144, 1572 (2005), amended section 5308 of title 49 United States Code, commonly referred to as the Clean Fuels Grant Program, from a formula-based to a discretionary grant program.

On October 1, 2013, the Clean Fuels Grant program was repealed by Congress under the Moving Ahead for Progress in the 21st Century Act. Originally, the program had two reporting requirements by grant recipients; the application stage and the project management stage. Since being repealed, the program no longer announces grant funding opportunities, thus totally eliminating the application stage. However, to meet federal program oversight responsibilities, FTA must continue to collect information under the program management stage until the period of availability expires; the funds are fully expended; the funds are rescinded by Congress; or the funds are otherwise reallocated.

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

Since the application stage is being eliminated, the only information collected as part of the Clean Fuels Grant Program occurs during the Project Management Stage. During this stage, grant recipients are required to submit various reports electronically via FTA's Transportation Electronic Award and Management (TEAM) system. However, not all grant recipients are required to submit every report.

All recipients shall maintain and report financial and operating information on a quarterly basis by submitting their Federal Financial Reports (FFRs) into team. However, only the recipients of financial assistance under 49 U.S.C. 5308 who purchase or lease hybrid electric, battery electric and fuel cell vehicles shall report semi-annually to FTA for the first three years of the useful life of the vehicle. In addition, recipients that purchase or lease clean diesel vehicles are not required to report information beyond FTA grant reporting requirements for capital projects. Below is a summary of each of the various reports and/or information collected.

- a. Federal Financial Reports (FFRs)/Quarterly: All grant recipients are required to submit 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.
- b. Milestone/Progress Reports (MPR)/Semi-Annually: These narrative reports define the level of activity for each project element during the reporting period. All significant events (e.g. delays, problems, milestone achievements, etc.) are reported to FTA. The reports greatly reduce the need for on-site visits by staff. Since March 2007, recipients of 5308 projects that operate transit from small urbanized areas are no longer required to submit quarterly reports, but instead are required to submit Semi-Annual Milestone/Progress Reports for the first three years of the useful life of the vehicle.

If this information is not collected, FTA could not ensure the proper expenditure of federal funds or assess the program effectiveness.

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

FTA's Transportation Electronic Award and Management (TEAM) system is an online program used by 100% of recipients to submit reporting requirements during the project management stage.

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.

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.

If the information was not collected during the project management stage, FTA would not be able to track expenditures for approved projects as federally required. Further reduction of reporting information would make it impossible to determine the reliability, benefits and costs of operations and performance of clean fuel technology buses and conduct trend analyses.

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 November 4, 2014 – Volume 79, No. 213, (pages 65476 and 65477) 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 December 29, 2014 - Volume 79, No. 248 (pages 78136) and 78137).

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.

The estimated hourly and cost burden of the Clean Fuels Grant Program during the Project Management stage is presented below. The estimate is based on the review of the grantees internal documents in preparation of each of the required reports that are submitted into TEAM by the grant recipient. FTA estimates that only (1) lawyer, accountant, mechanical engineer, and/or admin personnel will be involved in the preparation of the request. Although there is no new funding available for this program, there are currently a total of (32) respondents that are required to continue reporting information under the project management stage. All (32) respondents must submit the FFR on a quarterly basis ($32 \times 4 = 128$ reports). However, only (21) respondents must submit a MPR on a semi-annual basis ($21 \times 2 = 42$ reports) due to the type of vehicle purchased. Therefore, there are a total of 170 reports ($128 + 42$) reports submitted on an annual basis. If each report takes approximately 2 hours to complete, the total annual burden hours is 340 hours (170×2).

Report Requirements	# Total Respondents	#Total Submissions/Reports Annually	Burden hours per submission
Federal Financial Reports (FFR) Submitted Quarterly	32	128	2
Milestones/Progress Reports (MPR) Submitted Semi- Annually	21	42	2

Estimate of the cost to respondents:

Project Management Stage:

It is estimated to take each respondent approximately (2) hours to prepare and submit the FFRs and/or MPRs at an average salary of \$32 per hour or \$64 per report. There are a total of 170 reports annually; therefore, the cost is estimated to be ($\$64 \text{ per report} \times 170 \text{ reports} = \$10,800$).

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 is calculated as follows:

Project Management Stage:

The average FTA employee reviewing program management reports (FFRs and MPRs) submitted into TEAM by recipients is between a GS-12 and GS-13 (average salary, \$42 per hour). It takes approximately 2 hours per report for review. There are 170 reports per year. Thus, the total annual hours spent reviewing reports is 340 hours (170 x 2).

The total cost to the federal government is \$14,280 (\$42 per hour x 340 hours = \$14,280).

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

Burden hours decreased because the Clean Fuels Grant Program has been repealed under MAP-21, thus eliminating the Application Stage and all cost and burdens associated with this phase.

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.