

**Supporting Statement A
Airports Grants Program
OMB 2120-0569**

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

Title 49, U.S.C., which is referred to as the "Act," provides funding for airport planning and development projects at airports included in the National Plan of Integrated Airport Systems. The Act also authorizes funds for noise compatibility planning and to carry out noise compatibility programs. The information required by this program is necessary to protect the Federal interest in safety, efficiency, and utility of the Airport; and to prevent fraud, waste and abuse of public funds.

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.

Airport owners and managers (sponsors) are required to report this information on occasion to the FAA in order to receive grant funds. This is a mandatory reporting collection the purpose of which is that airport authorities (owners and managers) are required to provide on occasion to the FAA in order to receive grant awards. The collected information consists of airport demographics (runway data; lighting data; enplanement data, etc.) and financial information. This information is received and used by the FAA for grant awarding and monitoring purposes; and in compliance with the enabling legislation. This is a mandatory reporting collection for certifications and representations, financial management and performance measurement as follows:

Certifications and Representations

The Uniform Guidance (2 CFR § 200), 49 CFR § 18 and 49 USC Chapter 471 authorize the FAA to require Sponsors to submit certain certifications and representations as required by Federal statutes or regulations. In compliance with these statutory and regulatory requirements data is collected on the following Federal Aviation Administration (FAA) forms:

- FAA Form 5100-128, Agreement on State Sponsorship and Airport Sponsor Obligations – Airport Improvement Program;
- FAA Form 5100-129, Construction Project Final Acceptance – Airport Improvement Program Sponsor Certification;
- FAA Form 5100-130, Drug-Free Workplace – Airport Improvement Program Sponsor Certification;
- FAA Form 5100-131, Equipment and Construction Contracts – Airport Improvement Sponsor Certification;
- FAA Form 5100-132, Project Plans and Specifications – Airport Improvement Program Sponsor Certification;
- FAA Form 5100-133, Real Property Acquisition – Airport Improvement Program Sponsor Certification;
- FAA Form 5100-134, Selection of Consultants – Airport Improvement Program Sponsor Certification;
- FAA Form 5100-135, Certification and Disclosure Regarding Potential Conflicts of Interest – Airport Improvement Program Sponsor Certification.

The FAA used the information to make funding decisions and to ensure compliance with statutes and regulations. By submission of the forms listed above, the FAA utilized the information to prepare and issue grants.

Financial Management

The Uniform Guidance and 49 USC Chapter 471 require that recipients of Federal monies meet certain standards for financial management, performance, reporting, and audits. Financial data is used by FAA personnel and accountants to ensure that grant obligations are not exceeded and revenue is not diverted. There would be great potential for revenue diversion and fraud if financial data were not collected. The FAA uses this information for payment processing, grant application review, compliance with Federal financial transaction protocols, budgeting, reports to Congress, and to ensure compliance with other statutory and regulatory requirements. Financial reports and requests for payment are used in the grant programs' fund control process, payment process, and accounting systems.

The FAA uses the information in fulfillment of our oversight and fiduciary responsibilities to the taxpayers. We work to ensure their funds are spent in accordance with the enabling legislation, appropriation law, FAA policy and program requirements. The reviews highlight changes in schedules and costs. Cargo activity report is used to allocate funding to cargo facilities. Development and planning applications are used to establish a proposed grant budget. Government payment and financial summary reports are collected to provide the FAA with a means of evaluating sponsor compliance with revenue-use requirements. Buy American information is collected to ensure compliance with Buy American requirements. Transfer reports are used to ensure compliance with protocols and procedures associated with transfer of Federally-funded capital assets. Benefit cost analysis is done to help identify proposed projects that will provide a net benefit to the aviation community. The letter of intent (LOI), snow removal inventory form and cold weather early start forms are used by the FAA as financial planning and forecasting tools. Data is collected on the following FAA forms:

- FAA Form 5100-108, All Cargo Carrier Activity Report;
- FAA Form 5100-100, Application for Federal Assistance (Development);
- FAA Form 5100-101, Application for Federal Assistance (Planning);
- FAA Form 5100-126, Financial Government Payment report;
- FAA Form 5100-127, Operating and Financial Summary;
- FAA Form 5100-110, Request for FAA Approval of Agreement for Transfer of Entitlements;
- FAA Form 5100-136, Buy American Content Percentage Calculation Worksheet;
- FAA Form 5100-137, Buy American Preferences – Final Assembly Questionnaire;
- FAA Form 5100-138, Data Requirements for an Office of Airports Automated Weather Observation System (AWOS) Benefit Cost Analysis (BCA);
- FAA Form 5100-139, LOI Application Financial Template;
- FAA Form 5100-141, Inventory of Snow Removal Equipment; and
- FAA Form 5100-142, Sponsor Request for FAA Acknowledgment for Cold Weather Early Start.

The FAA used the information to make funding decisions and to ensure compliance with statutes and regulations; and in fulfillment of our oversight and fiduciary responsibilities to the taxpayers. By submission of the forms listed above, the FAA has prepared and issued grants during the fiscal year as spending levels are appropriated by Congress; amended actual dollar amounts and descriptions to reflect changes in existing grants; monitored the progress of projects and status of remaining funds in a project through financial status reports. The requested forms also serve as documentation for routine audits.

Performance Measurement

As specified in 2 CFR § 200, proper program management requires that information be collected about program performance. Sponsors are required to monitor performance on grant projects to ensure that time schedules are being met and performance goals are achieved. Data is collected on the following FAA forms and plans:

FAA Form 5370-1, Construction Progress and Inspection Report; and
FAA Form 5100-140, Performance Report.
Construction Management Plan

The FAA used the information to monitor performance of the funded projects and in fulfillment of our oversight and fiduciary responsibilities to the taxpayers to ensure their funds were spent in accordance with the enabling legislation, appropriation law, FAA policy and program requirements. The reviews highlight changes in schedules and costs. These reports are reviewed by FAA personnel to determine that project performance goals have been met. If these reviews were not made, the Federal government would be vulnerable to unexpected costs overruns and time delays.

The information collected will not be disseminated publicly except information from Forms 5100-126/127. Airport financial data is made available per the Federal Aviation Authorization Act of 1994 to inform the public about how airports collect and disburse funds. The information is available for viewing at <http://cats.airports.faa.gov/>.

Responding to the collection is necessary to obtain a Federal award, and the responders are public-use airports. This is an annual reporting collection of sponsor identifying information and financial information used for planning, development or noise compatibility projects at individual airports. Information is received by the FAA.

The Airport Improvement Program (AIP) uses the collection to make funding decisions to provide grants to public agencies — and, in some cases, to private owners and entities — for the planning and development of public-use airports that are included in the [National Plan of Integrated Airport Systems \(NPIAS\)](#). The collection of this information supports the DOT Safety strategy “to work effectively with State, local, and private partners; address human behaviors that increase safety risks; improve safety data analysis to guide decisions; ensure automation brings significant safety benefits; and pursue performance-based objectives.” Other major policy objectives are advanced by assigning high priority in the award of grant funds to projects that maintain current airport infrastructure and increase safety and environmental sustainability.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

Approximately 75% of the current collection is submitted electronically. The organization has efforts under way to allow electronic grant submission and performance reporting, which we expect will positively affect the existing burden on airport sponsors. For the last few years, the FAA has worked on updating its grants management system to accommodate this process and internal testing continues. Full electronic processing for this collection may still be several years off because of the significant number of data elements and reporting requirements that must be incorporated and tested; however, as we move toward full automation, we have also put a team in place to identify ways to streamline the existing process and thus further reduce the overall burden to sponsors.

The FAA Airports Organization is licensing third party e-signature software that will be in place by December 30, 2019. We plan to begin testing this service with airport sponsors in 2020 and, depending on the success of this testing, allow digital signatures on fillable PDF forms during the fiscal year 2020 grant program.

All forms except 5100/126-127 and 5100/136-139 and 5100/140-142 may be viewed and printed from <https://www.faa.gov/forms/>.

Forms 5100/126-127 may be viewed and printed from <https://www.faa.gov/forms/index.cfm/go/document.information/documentid/185624> and <https://www.faa.gov/forms/index.cfm/go/document.information/documentid/185626> respectively.

Forms 5100-136/137 may be viewed and printed from https://www.faa.gov/airports/aip/buy_american/?frns.

Form 5100-139 may be viewed and printed from <https://www.faa.gov/airports/aip/loi/>.

Form 5100/138,141-142 are available from regional offices at https://www.faa.gov/about/office_org/headquarters_offices/arp/regional_offices/.

The information collected will not be disseminated publicly except information from Forms 5100-126/127. Airport financial data is made available per the Federal Aviation Authorization Act of 1994 to inform the public about how airports collect and disburse funds. The information is available for viewing at <http://cats.airports.faa.gov/>.

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 above.

Duplication is not possible since data collected from the airport sponsor is unique to the specific airport, the specific project, and specific project period and does not exist elsewhere. Other than basic identification data, such as name and address, the information collected is unique and no similar data exists.

5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

This collection does not affect small businesses or small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Annual reporting is required by Section 47107(a) of the Title 49 U.S.C.; failure to collect the information will result in non-compliance with the statute. It would also prevent the FAA from making funding decisions based on accurate, complete and current financial data and other information. Any less frequent reporting would not provide adequate financial or programmatic oversight in order to monitor and detour revenue diversions.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

There are no special circumstances associated with this collection.

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the

public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A Federal Register Notice published on March 11, 2019 (84 FR 8779) solicited public comment. One comment was received. The comment and our responses to the commenter follow.

When I called the FAA to ask about the 21 forms and whether each airport would be responsible for completing all 21 forms, I did not get a definitive answer one way or the other.

FAA: Airports are responsible for completing any of the twenty-two (22) forms that are applicable to their request for funding. Not every form is applicable to every airport every year. For example, airports located in milder climates likely will not need to complete the Inventory of Snow Removal Equipment (Form 5100-141), or the Sponsor Request for FAA Acknowledgement for Cold Weather Early Start (Form 5100-142). Other forms need to be completed only for specific types of projects, acquisitions or activities such as the Real Property Acquisition form (Form 5100-133) or the Request for FAA Approval of Agreement for Transfer of Entitlements (Form 5100-110). Each airport will complete the forms that are necessary and required for that airport and/or project.

Assuming that we are filling out the majority of the 21 forms, I think that a 9-hour administrative burden is not accurate, especially for Non- or Small-Hub airports. At these airports, there is usually one person who is responsible for financial or grant reporting. To ask one person to dedicate their time to filling out 21 forms while they handle their other responsibilities is excessive.

FAA: It is unlikely that every airport will be required to complete all twenty-two forms. The burden hours' estimate is a national average which considers airports of all sizes, available resources and funding history. Most of the forms don't change materially across time, and many of the airports are familiar with the content. The more frequently an airport completes a form, the less time it will likely take to do so. In addition, each year the notice of funding availability usually allows airport applicants 30 - 90 days to complete and submit the application and required forms. Hopefully, this gives airports the ability to develop grant application timelines and completion schedules around the same time each year, as well as allowing time for unforeseen delays, unscheduled absences, etc.

When I asked why all of this information was needed, the FAA representative informed me that the information would be used by various departments to work on metrics, performance measures and analytics. Airports are filling out these forms on a quarterly/semi-annual/annual basis already--why can't the FAA use the data that airports are already supplying?

FAA: In addition to what is stated in the comment, the collection of this information supports the Department of Transportation's safety strategy to improve public health and safety by reducing transportation-related fatalities and injuries for all users, working toward no fatalities across all modes of travel. Other major policy objectives are advanced by assigning high priority in the awarding of AIP funds to projects that maintain current airport infrastructure and increase environmental sustainability.

In addition, most of the forms are included with the annual application for funding, and some of the data will be used to make a funding decision. It would be unfair to the airports if the FAA used previously submitted data to make a decision to fund or not fund an airport project - the data may be outdated, inaccurate or otherwise invalid. Applicants submit current data that supports their request for funding.

I also would like to know how much time will airports be given to supply the requested data. This cannot be turned around in a week or two; it would be helpful if airports could be given 90-120 days for this work to get done. Again, those of us at small airports are extremely busy at certain times of the year and need as much notice as possible. From the months of September (end of our fiscal year) to April, my Airport Finance Department is working on Year-End activities, the Internal Audit, submitting the annual budget, AIP grant pre-application and application and Airport Capital Improvement Program activities

FAA: Most of the forms are completed as part of the application process. A few of the forms are completed after funding has been awarded (forms 5370-1, 5100-126, 5100-127 and 5100-140, for example). In general, applicants have 30 - 90 calendar days to complete and submit the application and all required forms. Due dates for other required forms are usually provided after the airport has been notified of funding approval.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

No payments or gifts are provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

No assurance of confidentiality is given to respondents.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

Burden estimates were developed from anecdotal data provided by users of the various forms. Specific reporting requirements are shown in the narratives and tables below. The labor hour burden is estimated on an annual basis.

Sponsors of public use airports or public agencies are required to document aspects of project planning design, acquisition, construction and closeout; including technical equipment determinations, and compliance with federal requirements, such as the Drug-Free Workplace Act.

Certifications and Representations: Form 5100-128, 5100-129, 5100-130, 5100-131, 5100-132, 5100-133, 5100-134, 5100-135

Summary (Annual Numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	1,550		

# of Responses per respondent	1		
Hours per Response	8		
Total # of responses	1,550		
Total burden (hours)	12,400		

Sponsors of public use airports or public agencies may submit preapplications and/or applications for one or more projects in a form prescribed by the Secretary of the Department of Transportation (Preapplications are not required by FAA, though some sponsors choose to submit them). The ACIP and application must contain a list of projects for programming, airport layout sketches, a description of relocation cost, plans, and assurances, a statement describing clearing procedures and public hearings, environmental assessments, property descriptions, plans and specifications for projects, civil rights, and other assurances. FAA Forms 5100-100 and 5100-101 are used for this purpose.

Financial Management: Forms 5100-100, 5100-101

Summary (Annual Numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	2,054		
# of Responses per respondent	1		
Hours per Response	28.0141		
Total # of responses	2,054		
Total burden (hours)	57,541		

The available funds are apportioned to sponsors of airports, which are served by aircraft providing scheduled and nonscheduled service of property only with an aggregate annual landed weight in excess of 100,000 pounds. FAA Form 5100-108 is used annually for this purpose.

Financial Management: Forms 5100-108

Summary (Annual Numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	350		
# of Responses per respondent	1		
Hours per Response	0.5		
Total # of responses	350		
Total burden (hours)	175		

Sponsors of public use airports or public agencies are required to document aspects of project design, implementation, and closeout, including technical equipment determinations, and compliance with federal requirements, such as Buy American.

Financial Management: 5100-110, 5100-136, 5100-137, 5100-138, 5100-139, 5100-141, 5100-142

Summary (Annual Numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	1,550		
# of Responses per respondent	1		
Hours per Response	8		
Total # of responses	1,550		
Total burden (hours)	12,400		

Section 47107(a)(19) of Title 49 requires airport owners and operators to submit to the Secretary and make available to the public an annual report listing of all amounts paid by the airport to other units of government and the purpose of payment. Airport owners or operators must also make available a listing of all services and property provided to other units of government and the amount of

compensation received for the provision of each service and property. FAA Form 5100-126 is used for this purpose.

Financial Management: Form 5100-126

Summary (Annual Numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	550		
# of Responses per respondent	1		
Hours per Response	3		
Total # of responses	550		
Total burden (hours)	1,650		

49 U.S.C. § 47107(a)(15) requires the Secretary of Transportation to issue a simplified format for reporting applicable to Airports to assist in public understanding of airport finances and to provide information concerning the amount of any revenue surplus the amount of concession generated revenue, and other information required by the Secretary. FAA Form 5100-127 is used for this purpose. The most recently completed year for which we have available data at this time is 2017.

Financial Management: Form 5100-127 Commercial Service Airports

Summary (Annual Numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	550		
# of Responses per respondent	1		
Hours per Response	5		
Total # of responses	550		
Total burden (hours)	2,750		

Financial Management: Form 5100-127 Supplemental Information from Large, Medium and Small Hub Commercial Service Airports

Summary (Annual Numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	330		
# of Responses per respondent	1		
Hours per Response	1		
Total # of responses	330		
Total burden (hours)	330		

Construction work on any grant project is subject to the inspection and approval of the Secretary. Regulations require cost and progress reporting by the sponsor. The following burden is associated with sponsor certification of qualified engineering and construction specifications, compliance with wage regulations, and periodic performance reporting. FAA Form 5370-1 and the Construction Management Program are used for this purpose.

Performance Measurement: Forms 5100-140, 5370-1

Summary (Annual Numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	6,165		
# of Responses per respondent	1		

Hours per Response	5		
Total # of responses	6,165		
Total burden (hours)	30,825		

Forms Summary	Responses	Hours
Performance Measurement Forms:		
5100-140, 5370-1	6,165	30,825
Total Performance Measurement	6,165	30,825
Certifications and Representations Forms:		
5100-133, 5100-132, 5100-131, 5100-130, 5100-129, 5100-128, 5100-135, 5100-134	1,550	12,400
Total Certifications and Representations	1,550	12,400
Financial Management Forms:		
5100-100, 5100-101	2,054	57,541
5100-108	350	175
5100-110, 5100-136, 5100-137, 5100-138, 5100-139, 5100-141, 5100-142	1,550	12,400
5100-126	550	1,650
5100-127	550	2,750
5100-127 Supplementary	330	330
Total Financial Management	5,384	74,846
Total All Forms	13,099	118,071

Cost data is taken from US Dept. of Labor, Bureau of Labor Statistics Occupational Employment Statistics for labor category 00-0000, All Occupations, as the forms could be completed by staff in a wide range of positions and pay ranges (example, an engineer, clerk, certified public accountant, secretary, student intern, airport manager). The 2018 mean hourly wage rate for 00-0000 is \$24.98 (https://www.bls.gov/oes/current/oes_nat.htm). The average fringe benefit rate for government employees is 37.5% (US Dept. of Labor, Bureau of Labor Statistics News Release 10:00 EDT Tuesday, March 19, 2019; <https://www.bls.gov/news.release/pdf/ecec.pdf>); and the average burden rate, including fringe benefits, (overhead) is 50% (GrantThornton, 2017 Government Contractor Survey, Spring 2018; <https://www.grantthornton.com/library/survey-reports/public-sector/2018/2017-government-contractor-survey.aspx>). We calculate the total as follows:

2018 Mean Hourly Wage Rate	\$24.98
Average Fringe Benefit Rate	37.5%
Total Hourly Rate	\$34.35
Average Overhead Rate	50%
Total Rate	\$51.52
Total Annual Hours	118,071

Total Annual Cost	\$6,083,018
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13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.

There are no material costs to respondents.

14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

Cost data is taken from US Dept. of Labor, Bureau of Labor Statistics Occupational Employment Statistics for labor category 00-0000, All Occupations, as the staff support might be provided by a wide range of positions, pay ranges and localities (example, GS-5 through GS-15). The 2018 mean hourly wage rate for 00-0000 is \$24.98 (https://www.bls.gov/oes/current/oes_nat.htm). The average fringe benefit rate for government employees is 37.5% (US Dept. of Labor, Bureau of Labor Statistics News Release 10:00 EDT Tuesday, March 19, 2019; <https://www.bls.gov/news.release/pdf/ecec.pdf>); and the average burden rate, including fringe benefits, (overhead) is 50% (GrantThornton, 2017 Government Contractor Survey, Spring 2018; <https://www.grantthornton.com/library/survey-reports/public-sector/2018/2017-government-contractor-survey.aspx>). We calculate the total as follows:

2018 Mean Hourly Wage Rate	\$24.98
Average Fringe Benefit Rate	37.5%
Total Hourly Rate	\$34.35
Average Overhead Rate	50%
Total Rate	\$51.52
Total Annual Hours	42,000
Total Annual Cost	2,163,840

15. Explain the reasons for any program changes or adjustments.

Adjustments due to updated estimates and revised calculations resulting from the updates.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The information collected is not published, except for data from Forms 5100-126/127. Airport financial data is made available per the Federal Aviation Authorization Act of 1994 to inform the public about how airports collect and disburse funds. The information is available for viewing at <http://cats.airports.faa.gov/>.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

We are not seeking approval not to display the expiration date.

18. Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”

There are no exceptions.