

SUPPORTING STATEMENT
National Transit Asset Management (TAM)
OMB CONTROL NO. 2132-0579

A. JUSTIFICATION

The purpose of this request is to seek the Office of Management and Budget’s (OMB) approval for an extension without change of a currently approved information collection OMB Control Number: 2132-0579, “National Transit Asset Management (TAM) System” that is associated with 49 CFR Part 625, 49 CFR Part 630 and currently due to expire on May 31,2026. The overall increase in total burden hours, despite a decrease in the total number of respondents, is attributed to a corresponding increase in the total number of responses. This is not a result of any action by FTA or change in statutory requirements. This change is driven by the respondent universe with an increase in the number of Tier II providers who are now submitting individual plans. This indicates a shift in reporting, suggesting either the presence of new reporters or former participants in a Group TAM Plan who are now reporting individually.

This program requires FTA grantees to develop management plans for their public transportation assets, including vehicles, facilities, equipment, and other infrastructure. Transit Asset Management (TAM) asks transit agencies to develop a strategic approach to maintain and improve capital assets. Every FTA-supported transit provider is required to develop a compliant TAM plan, set performance targets for capital assets, create data and narrative reports on performance measures, and coordinate with their planning partners.

1. Explain the circumstances that make the collection of information necessary.

Critical to the safety and performance of a public transportation system is the condition of its capital assets—most notably, a system’s equipment, rolling stock, infrastructure, and facilities. When transit systems are not in a state of good repair, the consequences include increased safety risks, decreased system reliability, higher maintenance costs, and overall lower system performance. Insufficient funding combined with inadequate asset management practices have contributed to an estimated \$101 billion transit state of good repair (SGR) backlog a value derived from FTA’s Transit Economic Requirements Model (TERM) Scale and representative of the reinvestment cost to improve transit asset conditions to the midpoint of its 1 (poor) to 5 (excellent) scale.

It is unlikely that the Nation’s state of good repair (SGR) backlog can be addressed through increased spending alone. Rather, a systematic approach is needed to ensure that existing funding resources are strategically managed to target the SGR backlog.

The National Transit Asset Management (TAM) System is in accordance with section 20019 of the Moving Ahead for Progress in the 21st Century Act codified at 49 U.S.C.5326 (section 5326) and reiterated in the FAST Act. The National TAM System must include the following: a definition of the term “state of good repair”; a requirement that all recipients and sub-recipients under Chapter 53 develop a TAM Plan, which would include an asset inventory, an assessment of the condition of those assets, decision support tools, and investment prioritization; annual reporting requirements; and technical assistance provided by FTA to recipients, including an analytical process or decision support tool that allows for the estimation of capital asset needs and assists with investment prioritization. In addition, 49 CFR 625 (TAM Final Rule) established four SGR performance measures, and recipients are required to set performance targets based on those measures. Furthermore, each recipient is required to submit an annual report to the National Transit Database (NTD) on the condition of their public transportation systems and include a description of any change in condition since the last report and its progress towards meeting performance targets established during that fiscal year and a description of the recipients’ performance targets for the subsequent fiscal year.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

The primary users of the information will be FTA and the transit providers (FTA grant recipients and sub-recipients). The same two groups of transit providers will be providing information; Tier I provider means a recipient that owns, operates, or manages either (1) one hundred and one (101) or more vehicles in revenue service during peak regular service across all fixed route modes or in any one non-fixed route mode, or (2) rail transit, and Tier II provider means a recipient that owns, operates, or manages (1) one hundred (100) or fewer vehicles in revenue service during peak regular service across all non-rail fixed route modes or in any one non-fixed route mode, (2) a subrecipient under the 5311 Rural Area Formula Program, (3) or any American Indian tribe. The information developed will be used in decision support tools that will assist transit providers to evaluate the current condition of their assets, project future asset condition, and prioritize investment to meet targets and improve the state of good repair of their capital assets.

The TAM Plan, which must be updated at least every four years, will help agencies to identify and prioritize investments to efficiently manage their assets, as well as assess risks that may impact safety and operational performance. The annual data progress report will help each transit provider assess the progress made towards achieving the target set previously and identify factors which may have contributed towards their failure to achieve the target. This also will help them to identify factors that contribute to achieving the performance targets, resulting in an improved understanding of the actions and outcomes. In addition, the TAM Plan and the narrative reports can be used by transit providers to inform the public and State legislators of the

providers' plans and progress towards the performance targets. This will increase transparency and accountability of the use of public funds. The annual narrative report will inform FTA on the outcomes of implementing a TAM System and provide insights into what issues still need to be addressed to achieve a state of good repair for the Nation's transit assets.

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

Transit providers will develop its TAM Plan with computing software, such as Microsoft Word or Excel, and graphical software. FTA will verify compliance with the TAM Plan requirements during the Triennial or State Management review process, which are FTA's existing audit processes. The annual narrative report, performance targets, and the asset condition report will be submitted electronically to the National Transit Database (NTD) every year. The performance targets will be included in the narrative report. The collection of this information is already included in another information collection (IC); National Transit Database (NTD) Asset Inventory Module 49 U.S.C. Section 5335(c). Since this information is already collected in another IC, there is no duplication of burden reporting.

TAM must include analytical tools to analyze the data to develop project priority lists, and performance measures and targets. Analytical tools can be developed with readily available off-the-shelf software such as Microsoft Excel. Transit providers also may choose to purchase software depending on the provider's needs. In addition, transit providers may use FTA's TERM Lite model free of charge.

4. Describe efforts to identify duplication.

FTA has taken several steps to gather information from the transit industry to develop TAM and continues to gather information. In addition to the extensive stakeholder information gathering for the rulemaking in 2016, FTA has continued to hold annual roundtables that host 80-100 transit attendees, webinars with 200-300 attendees, newsletters, and presentations at industry conferences including APTA, CTAA and AASHTO.

Each occasion provides an opportunity to highlight any potential duplication in the requirements and what may be required elsewhere.

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

To minimize burden on small transit service providers, recipients are categorized into two tiers, with fewer requirements for the smaller transit service providers. The smaller entities are classified as Tier II providers meaning a recipient that owns, operates, or manages (1) one hundred (100) or fewer vehicles in revenue service during peak regular service across all non-rail

fixed route modes or in any one non-fixed route mode, (2) a subrecipient under the 5311 Rural Area Formula Program, (3) or any American Indian tribe. These recipients have the option of participating in a Group TAM Plan that is developed by a direct recipient such as a State or other designated recipient. Tier II providers are only required to develop a less burdensome TAM Plan by excluding the requirements for identifying policies and strategies to achieve transit asset management; strategies for implementation of the TAM Plan; a list of key activities to achieve asset goals; identification of financial resources to meet the asset management goals; and a plan for continuous improvement.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

A less than annual reporting of this information would not be sufficient to know the condition of transit revenue vehicle fleet. This information is used for estimating the future transit investment needs reported in the Condition and Performance Report produced by U.S.DOT which was last published in 2024 [Report to Congress \(C&P\) - 25th Edition \(dot.gov\)](#). For some assets, such as stations and facilities, the condition data will be collected every four years. In addition, FTA is not collecting condition data for any assets that transit providers do not have direct capital responsibility for. If asset condition reporting occurred less frequently, the value derived from a better understanding of changes in asset condition would be compromised by limiting the ability to understand trends overtime. FTA uses annual reporting of SGR performance targets to identify what each transit provider is planning to achieve each year and measure an individual transit provider's progress towards meeting SGR.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

The information collection fully applies with 5 CFR 1320.6

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 60-day Federal Register notice was published on March 26, 2026 (Vol. 91, FR. 14751), soliciting comments prior to the submission of this information collection to the Office of Management and budget (OMB). No comments were received from that notice. A 30-day Federal Register notice was published on May 27, 2026 (91FR 31521).

FTA engages in stakeholder outreach including a webinar series with approximately 200-300 attendees each to inform and educate transit providers of TAM. In addition, FTA hosts an annual

roundtable which attracts 80-100 transit practitioners. FTA also conducts informal presentations at workgroup and association meetings. There is also a TAM outreach materials page with fact sheets, TAM news, trainings and presentations that is updated regularly [FTA Outreach Materials | FTA \(dot.gov\)](#). There is also a TAM Resource table [Transit Asset Management Resource Table | FTA \(dot.gov\)](#) with a full list of available resources including FTA reports, materials from webinars and roundtables, and publications from external stakeholders. FTA will continue to provide outreach to stakeholders.

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

No payment or gift is made to respondents.

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

Respondents are not provided with any assurance of confidentiality. The data is used to determine eligibility for receipt of grant funds and compliance with statutory requirements.

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.

The documents do not require any information of a sensitive nature such as sexual behavior or attitudes, religious beliefs, or other matters that are commonly considered private. None of the information required is of a personal nature.

12. Provide an estimate in hours of the burden of the collection of information.

Total Annual Respondents: **2,867** (157 Tier I +2,710 Tier II)

Total Annual Responses: **1,005** (157 Tier I + 848 Tier II)

Total Annual Burden Hours: **412,319** (168,111 Tier I + 244,208 Tier II)

Total Annual Burden Cost: **\$23,044,769** (\$11,057,395 Tier I + \$11,987,374 Tier II)

Estimated Total Annual Number of Respondents and Responses:

Tier I:

There are 157 Tier I providers. These are direct/individual transit providers that submit one Transit Asset Management Plan for a total of 157 plans/responses on an annual basis.

Tier II:

There are 2,710 Tier II providers. Of the 2,710 transit providers, only 848 TAM Plans/responses are developed on an annual basis [771 (Individual Plans) + 77 (Group Plans)] because many designated recipients will develop Group TAM Plans for their subrecipients which includes data for all of its subrecipients. Accordingly, a Group TAM Plan Sponsor (designated recipient)

would submit one data report and one narrative report on behalf of all the Group TAM Plan participants (subrecipients).

Estimated Total Annual Burden Hours and Cost:

Tier I:

FTA estimates that the total annual burden hours associated with this information collection for Tier I providers is 168,111. FTA estimates that the total annual burden cost associated with this information collection for Tier I providers is \$11,057,395.

Tier II:

FTA estimates the total annual burden hours associated with this information collection for Tier II providers is 244,208 hours. FTA estimates that the total annual burden cost associated with this information collection for Tier II providers is \$11,987,374.

Tables 1 and 2 below show the hours of burden and the dollar cost incurred by Tier I and Tier II transit providers implementing the TAM Rule. The tables show the assumptions made for the level of effort and the loaded wage rates (wage rate adjusted to account for employer cost of fringe benefits)¹ used for estimating the hours of burden and the cost of implementing the Rule.

The TAM regulation calls for some other activities to be repeated less than annually. In all cases, the reported burden hours and costs in the table represent an annualized average – i.e., the total estimated cost of the activity divided by the number of years in the cycle.

Table 1: Tier I Operators (More Than 100 Vehicles and Rail Fixed Guideway)

Item	Labor Rate (\$/hr) Urban	Average Annual Recurring Hours of Burden	Average Annual Recurring Costs
	(May 2023 BLS Statistic)		
Asset Assessment	\$73.19	90,082	\$6,593,102
Asset Inventory	\$51.81	5,652	\$292,830
Analytical Processes	\$51.81	32,656	\$1,691,907
Project List	\$51.81	5,652	\$292,830
Strategy and Other Plan Items	\$73.14	12,560	\$918,638
Performance Management	\$73.14	5,652	\$413,387
Narrative Reporting and Review	\$73.14	3,140	\$229,660
TAM Plan Management (Planning/Recordkeeping, and IT)	\$49.15	12,717	\$625,041
Total Annual Dollar Cost and Hours of Burden		168,111	\$11,057,395

¹ BLS data show wages as 61.7% of total compensation, with benefits at 38.3%. Therefore, employees' wages are factored by 1.621 (100 / 61.7) to account for employer provided benefits.

Table 2: Tier II Operators (100 Vehicles or Less and No Rail Fixed Guideway)

Item	Labor Rate (\$/hr) Urban	Average Annual Recurring Hours of Burden	Average Annual Recurring Cost
	(May 2023 BLS Statistic)		
Asset Assessment	\$76.13	41,536	\$3,162,136
Asset Inventory	\$38.14	30,528	\$1,164,338
Analytical Processes	\$38.14	88,192	\$3,363,643
Project List	\$38.14	20,352	\$776,225
Performance Management	\$76.13	20,352	\$1,549,398
Narrative Report and Review	\$76.13	8,480	\$645,582
TAM Management Plan (Planning/Recordkeeping and IT)	\$38.14	34,768	\$1,326,052
Total Recurring Average Annual Dollar Cost and Hours of Burden		244,208	\$11,987,374

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question 12 above).

FTA estimates no other costs to respondents' other than the costs associated with the paperwork burden hours shown in item #12 above (which are not to be included in item #13). There are no capital/start-up costs or operation/maintenance costs associated with the information collection burden.

14. Provide estimates of annualized cost to the Federal government (admin and IT).

The total annual cost to the Federal Government is **\$1,873,276**.

The TAM program is supported by contracts awarded in FY 2025 at a level of approximately \$450,000. This is a 5-year fixed contract.

The TAM program is also supported by 2.5 FTE in DC at an average GS-13 Step 6 [DCB h.pdf](#) with a salary of \$140,677/year for a total of \$351,693. Another 10 partial FTE support the TAM program throughout the country in each of the 10 FTA regional offices at an average GS-11 Step 5 [DCB h.pdf](#) \$71,583. The TAM program has additional administrative costs and IT of approximately \$1 million each year for support. Thus, the total cost to the federal government is approximately **\$1,873,276**.

There will be additional costs to the Federal government to collect, analyze and publish the new data requested under TAM. These costs are covered by another information collection National Transit Database (OMB #2132-0008).

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

This information collection request is for renewal without change to the information being collected, as there have been no programmatic or statutory changes to the TAM program requirements. The overall increase in total burden hours, despite a decrease in the total number of respondents, is attributed to a corresponding increase in the total number of responses. This change is driven by the respondent universe and is not a result of any action by the FTA or a change in statutory requirements. Specifically, there is an increase in the number of Tier II providers who are now submitting individual plans, indicating a shift in reporting that suggests either the presence of new reporters or former participants in a Group TAM Plan who are now reporting individually. The revised data for this current renewal is based on the latest available data reported to the National Transit Database (NTD) for Fiscal Year 2025, as Fiscal Year 2026 data has not been collected at this time.

16. For collections whose results will be published, outline the plans for tabulation and publication.

FTA will tabulate the data and make it available to the public through the National Transit Database website.

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.

FTA is not seeking approval of the exception.

18. Explain each exception to the certification statement.

Not applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

The collection does not employ statistical methods.