

From: [Grant Brodehl](#)
To: [Swayne, Qiana \(FRA\)](#); [Toone, Kim \(FRA\)](#)
Subject: Comments on OMB Control Number 2130–0615
Date: Wednesday, June 10, 2020 10:41:47 AM

Dear Ms. Swayne and Ms. Toone:

Thank you for the opportunity to comment on OMB Control Number 2130–0615, which regards FRA’s Information Collection Request (ICR) posted in the Federal Register on Friday, May 29, 2020. Over the last six years, I have helped draft and/or package grant applications for FRA, FTA, and USDOT programs, and am familiar with the requirements of many of the largest programs.

The “Statement of Work” (SOW) is a unique requirement of FRA’s grant application process. While it is not explicitly listed in the table of forms applicable to this ICR, the SOW is contained within Form F-35 “Grant Application”, which is listed first in the table. However, Form F-35, in its entirety, rarely seems to be required for FRA’s major grant programs (PTC, CRISI, Federal-State Partnership, etc.); rather, the SOW is typically required apart from Form F-35. For reference, a copy of F-35 may be found here: https://dotcms.fra.dot.gov/sites/fra.dot.gov/files/fra_net/18022/FRA%20F%2035.pdf

This primary issue I’d like to raise is that there is considerable redundancy between the SOW and the 25-page project narrative that is typically required to accompany a grant application. For example, the SOW requires a description of work and the project narrative requires a detailed project description; the SOW requires project management information and the project narrative requires a description of the proposed project management arrangements. The SOW also requires project funding and budget information, which is likewise required in one way or another in the project narrative, not to mention forms 424, 424-A and/or 424-C.

In preparing both a project narrative and SOW as part of a grant application, I believe this redundancy not only requires additional time, but also creates confusion. For example, perhaps it is my own failing, but it has never seemed quite clear to me how detailed the SOW should be when compared to the project narrative. Should the description of the problem, scope, end-state of the project, and benefits be more concise in the SOW since they were covered extensively in the project narrative? Unfortunately, I think the answer to that question is no, as past FRA webinars seemed to suggest that some reviewers focus solely on the SOW while others focus on the project narrative in part or in whole. Regardless, as an applicant, it’s not altogether clear how to cater both the project narrative and SOW to their respective audiences.

Furthermore, in the words of FRA’s website, the “[SOW] templates are intended to assist grantees in drafting an SOW for each application selected by FRA to receive funding. The development of an SOW should be a highly collaborative process between the grantee and FRA” (see <https://railroads.dot.gov/grants-loans/grant-administration/statements-work>). Setting aside the fact that all applicants—regardless of whether they are selected to receive FRA funding or not—are required to complete an SOW, judging a grant application on the merits of an SOW that has not been developed collaboratively seems to contradict FRA’s stated goal. I can appreciate that receiving a SOW with a grant application may give FRA a jumpstart on developing a future grant agreement, but I can’t help but question the SOWs value at such an early stage.

Ultimately, I suggest that FRA could tighten up the elements required for the project narrative to capture any additional information that might otherwise appear in the SOW, and then eliminate the SOW as part of the grant application process. If awarded, information could then be pulled from the project narrative into the SOW in a truly collaborative process with FRA. Borrowing from the language of the ICR, I believe this would reduce the burden to applicants, while still ensuring that FRA is receiving clear and quality information with practical utility for FRA to perform its functions.

Please know that I am submitting these comments in a constructive spirit. My agency is extremely appreciative of FRA's past funding support for our projects, and I am grateful for the opportunity to comment on FRA's grant application forms and processes.

Sincerely,

Grant Brodehl

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