FTA Section 5311 Funding: Proposed Revisions to the Funding Allocation Process

February 7, 2018

Final Report
EXECUTIVE SUMMARY

In response to concerns raised by recipients of Federal Transit Administration (FTA) Section 5311 funds, the Public Transportation Advisory Committee (PTAC) commissioned a study to look at the allocation method for the Section 5311 funding administered by the Rail and Public Transit Division. The study was to examine the current funding allocation process and evaluate potential changes to that method. PTAC designated a Section 5311 Working Group to provide direction for the study and make recommendations on possible changes in the allocation process. The nine-member Working Group was selected to provide a diverse representation, both in geography and type of provider, of Section 5311 recipients.

Currently, Oregon uses a formula to disperse the Section 5311 funds to eligible recipients. The current formula is as follows:

- All eligible participants receive a base amount of $100,000 per recipient per biennium (some entities receive more than one base due to the merging of two or more Section 5311 recipients, each of which previously received a base allocation)
- Distribution of remaining funds after the base amount is extracted is calculated based on revenue miles (accounting for 60 percent of the formula allocation) and rides (accounting for 40 percent of the formula allocation)
- Total allocation for each recipient is guaranteed to be no less than the previous biennium’s allocation and capped at an amount dictated by funding availability (the increase was capped at five percent this past biennium)

There are currently 35 Section 5311 recipients in Oregon. Total funding in the 2017-19 biennium is $17,963,688. The large majority of the Section 5311 funding in Oregon is used for transit operations.

Current Section 5311 recipients were surveyed twice during the study, and the results of those surveys were factored into the Working Group recommendations.

Recommendations

1. Continue to use a formula-based allocation method.
2. Continue with a formula based on revenue miles and rides, and continue with the current split of 60 percent based on service miles and 40 percent based on ridership.
3. Change the minimum guaranteed funding from 100 percent to 95 percent of the previous biennium’s allocation.
4. Allocate funds to systems whose performance would warrant an increase in their allocation proportionate to their performance calculation, but not to exceed a 10 percent increase in funding.
5. Maintain a base allocation of $100,000 for all recipients.
7. Continue current process for accommodating start-ups.
SECTION 5311 PROGRAM

The Federal Transit Administration (FTA) Section 5311, Formula Grants for Rural Areas Program, has been in existence since 1978. It provides funding for transit in rural communities, with the funding allocated to each state. It is up to the state to determine how to allocate the funding to eligible recipients within the state.

The FTA Section 5311 Program has the following elements:

- Provides capital, planning, and operating assistance to states to support public transportation in rural areas with populations of less than 50,000. Eligible activities include planning, capital, operating, job access and reverse commute projects, and the acquisition of public transportation services.

- Eligible recipients include states and federally recognized Indian Tribes. Subrecipients may include state or local government authorities, and nonprofit organizations.

- The federal share is typically 89.73 percent for capital projects, planning and administration; and 56.08 percent for operating assistance. Each state must spend no less than 15 percent if its annual apportionment for the development and support of intercity bus transportation, unless it can certify, after consultation with intercity bus service providers, that the intercity bus needs of the state are being adequately met.

- A maximum 10 percent of the funding can be used by the state for program administration, technical assistance, and planning.

CURRENT ALLOCATION PROCESS

Currently, Oregon uses a formula to disperse the Section 5311 funds to eligible recipients. The current formula is as follows:

- All eligible participants receive a base amount of $100,000 per recipient per biennium (some entities receive more than one base due to the merging of two or more Section 5311 recipients, each of which previously received a base allocation)

- Distribution of remaining funds after the base amount is extracted is calculated based on revenue miles (accounting for 60 percent of the formula allocation) and rides (accounting for 40 percent of the formula allocation)

- Total allocation for each recipient is guaranteed to be no less than the previous biennium’s allocation and capped at an amount dictated by funding availability (the increase was capped at five percent this past biennium)

There are currently 35 recipients in Oregon. Total funding in the 2017-19 biennium is $17,963,688. The large majority of the Section 5311 funding in Oregon is used for transit operations.
CONCERNS WITH CURRENT PROCESS

There have been repeated concerns expressed to ODOT about the formula used to distribute 5311 funds to eligible entities and the difficulty for new agencies to enter the program. Concerns included:

- The allocation process does not adequately reward improved performance (increased ridership, service level) due to the ceiling on biennium-to-biennium increases
- Some agencies don’t utilize all funding, but still receive a full allocation biennium after biennium
- Hard to accommodate “start-ups” – new agencies entering program
- Some systems, due to geography, service area size and density, or other factors, have more difficulty achieving high performance than other systems

In response to these concerns, the Public Transportation Advisory Committee (PTAC) commissioned a study to look at the allocation of the Section 5311 funding. The study was to examine the current funding allocation process and evaluate potential changes to that method.

SECTION 5311 WORKING GROUP

PTAC designated a Section 5311 Working Group to provide direction for the study and make recommendations to PTAC on possible changes in the allocation process. The nine-member Working Group was selected to provide diverse representation, both in geography and type of provider, of Section 5311 recipients. One member was not a Section 5311 recipient, and was brought on to provide an “outsider’s” perspective to the allocation process.

Section 5311 Working Group:

- Jeff Hazen, Sunset Empire Transportation District, Chair
- Mary Jo Carpenter, Community Connection of Baker County
- Kim Curley, Commute Options
- Karen Friend, Central Oregon Intergovernmental Council
- Andi Howell, City of Sandy
- Susan Johnson, Confederated Tribes of the Umatilla Indian Reservation
- Kathy McClaskey, City of Woodburn
- Mike Stinson, Basin Transit
- Dennis Pinheiro, Douglas County
SECTION 5311 DISTRIBUTION IN OTHER STATES

A tally of how other states distribute the Section 5311 funds was provided to the Working Group to provide a sense of the options that could be considered. The following information is from a 2010 Portland State University study (Assessment of Oregon Department of Transportation’s Section 5311 (Rural and Non-Urbanized Area) Grant Allocation Formula, Ashley R. Haire, November 2010).

- Competitive vs. formula allocation methods
  - 28 states use a competitive allocation method
  - 9 states use a formula-based allocation method
  - 1 state uses a combination of competitive and formula allocation
  - Data not available for 11 states

- States that use a formula (10 states)
  - 4 states use strictly population-based allocation
  - 4 states use a combination of population and performance factors
  - 2 states use performance factors only.

- Some states allocate regionally, then sub-allocate
- Some states combine 5311 allocation with other funding

This review of other states’ allocation methods shows that most use a competitive allocation method, requiring each transit provider eligible for Section 5311 funds to submit an application and for the state to review the applications and determine how funds are to be distributed. Of the states that, like Oregon, use a formula-based allocation method, most include a population basis in the formula.

It should be noted that Oregon previously used population as a factor in determining the distribution of Section 5311 funding. That was discontinued due to issues regarding providers that overlap in their service area (who gets credit for the population), and the fact that the population factor was independent of the service level, so a provider could receive funding based on very minimal service to a particular population.

FUNDING ALLOCATION OBJECTIVES

The Working Group developed a prioritized list of objectives for the allocation process. These objectives were informed by the results of a survey of Section 5311 recipients. The objectives, in order of importance, are:

1. Fairness/Equity
2. Stability of funding
3. Connectivity
4. Stewardship
5. Get people to where they want to go
6. Flexibility
7. Efficiency
8. Incentivize growth/Support new service
ENGAGEMENT OF SECTION 5311 RECIPIENTS

The Working Group placed a strong emphasis on soliciting feedback from current Section 5311 recipients throughout the study process. All meetings of the Working Group were open to the public and several interested persons chose to attend or call in. In addition, there were two surveys of Section 5311 recipients conducted during the study process.

The first survey was conducted to solicit concerns with the current process and to assist with finalizing the objectives for a revised allocation process. The second survey was conducted prior to the Working Group developing its final recommendations to the PTAC. Key results from that survey are highlighted in the “Recommendations” section of this report. The responses from the surveys are included as Appendices A and B.

RECOMMENDATIONS

COMPETITIVE VS. FORMULA ALLOCATION METHOD

Question: Should the Section 5311 allocation method continue to be based on a formula, or should a change be made to allocate the funds on a competitive basis, with eligible recipients submitting an application at each funding cycle?

RECOMMENDATION: Continue to use a formula-based allocation method.

The formula method was seen as providing greater stability of funding, which is a very strong objective for the allocation system. In addition, the competitive process, which requires the submittal and evaluation of applications every funding period, would take additional time and effort by both the recipients and ODOT staff.

PERFORMANCE CRITERIA

Question: What factors should be used for the performance criteria and what should the split be between the factors?

Currently, the performance criteria are based on revenue miles (60 percent) and rides (40 percent).

Survey Results

Should we continue to use service miles and ridership as Section 5311 performance measures?

Survey respondents were unanimous in their support to use service miles and ridership in the formula.
Survey Results

*If service miles and ridership are used, what should the split be?*

![Survey Results Chart]

About two-thirds of survey respondents agreed that we should keep the current 60/40 split between service miles and ridership. This aligns with the Working Group’s previous recommendation to keep the split as it currently exists. Of those who suggested a change in the split, there were about as many (17 percent) who thought it should emphasize ridership more (a 50/50 split) as those (14 percent) who thought it should emphasize service miles more (a 75/25 split).

**RECOMMENDATION:** Continue with a formula based on revenue miles and rides, and continue with the current split of 60 percent based on service miles and 40 percent based on ridership.

**MINIMUM/MAXIMUM**

*Question: Should there continue to be a minimum funding guarantee based on the previous allocation and, if so, what should that be?*

Currently, all Section 5311 recipients are assured of receiving no less than the previous biennium’s allocation. This guarantee of funding from biennium to biennium provides stability in the funding stream, which is critically important to Section 5311 recipients. The flip side, however, is that the guaranteed minimum funding level restricts the amount of funding that can be allocated based on the miles/rides formula to recipients who improve their relative performance compared to other Section 5311 recipients. This past biennium, no recipient received more than a five percent increase.
Survey Results
What should the guaranteed minimum funding level be?

A majority of survey respondents (62 percent) liked the idea of reducing the guaranteed minimum to 95 percent of the previous allocation.

**RECOMMENDATION:** Change the minimum guaranteed funding from 100 percent to 95 percent of the previous biennium allocation.

Question: Should there continue to be a maximum funding limit based on the previous allocation and, if so, what should that be?

Due to the allocation to recipients to meet the guaranteed minimum level of funding based on previous allocations and overall Section 5311 funding limits, it is not possible to allocate full funding to meet the amount dictated by the performance criteria. As a result, the funding has been capped, with the cap from the previous biennium placed at a five percent increase (maximum of 105% of the previous allocation). The cap could continue, or the increase could be proportional to their performance level, with the proportion based on available funding.

Survey Results
How should the maximum be determined?
The majority of respondents, at 59 percent, thought that a cap of 10 percent should be implemented. 38 percent believed that there should be no maximum, but rather should be a proportional amount tied to performance.

The Working Group reached consensus on a combination of a cap with proportional funding for those under the cap. Recipients whose performance, based on the allocation formula, dictated an increase in Section 5311 funds would receive an increase that is proportional to the available funding, with no recipient receiving more than a ten percent increase. If, for example, the funding available after the minimum guarantees are met would allow for funding half of the performance-based increase, the following funding allocations would be applied.

<table>
<thead>
<tr>
<th>Provider</th>
<th>Funding change based on formula (including base allocation)</th>
<th>Actual funding assuming WG recommendation and funding limits allowing for 50 percent proportional funding</th>
</tr>
</thead>
<tbody>
<tr>
<td>Provider A</td>
<td>85%</td>
<td>95%</td>
</tr>
<tr>
<td>Provider B</td>
<td>98%</td>
<td>98%</td>
</tr>
<tr>
<td>Provider C</td>
<td>106%</td>
<td>103%</td>
</tr>
<tr>
<td>Provider D</td>
<td>118%</td>
<td>109%</td>
</tr>
<tr>
<td>Provider E</td>
<td>130%</td>
<td>110%</td>
</tr>
</tbody>
</table>

**RECOMMENDATION:** Allocate funds to systems whose performance would warrant an increase in their allocation proportional to their performance calculation, but not to exceed a 10 percent increase in funding.

**BASE ALLOCATION**

**Question: Should a base be provided as part of the Section 5311 allocation?**

Currently, a base allocation of $100,000 is provided to every Section 5311 recipient. The intent of the base allocation is to ensure that every recipient receives at least enough funding to operate one vehicle in service. Currently, the base allocation accounts for about 21 percent of the total allocation to the Section 5311 recipients. The remaining 79 percent is provided through the miles/rides formula.

While the intent of the base allocation was to provide a minimum level of funding to each Section 5311 recipient, the fact is that the vast majority of the recipients receive well above the amount needed to operate a minimum level of service. The base allocation is not tied to the number of communities a recipient serves, the number of people served, or the geographic reach of the service.
Survey respondents were a mixed in their response to this question. A total of 48 percent preferred not to change from a base allocation to a guaranteed minimum allocation, but 31 percent did prefer the minimum allocation and an additional 21 percent were not sure what they preferred.

RECOMMENDATION: Maintain a base allocation of $100,000 for all recipients.

Question: If there continues to be a base allocation, should multiple bases be allowed?

As a result of the merging of two or more transit recipients, each with their own base allocation, some Section 5311 recipients currently receive more than one base allocation. Allowing this encourages consolidation of services, which enhances performance and efficiency. However, the result is that some recipients receive multiple bases by virtue of the sequence of service delivery, while other recipients, who may serve more communities and a wider geographic area, receive only a single base.

Survey Results
Should multiple bases be eliminated?

Survey respondents were a mixed in their response to this question. A total of 48 percent preferred not to change from a base allocation to a guaranteed minimum allocation, but 31 percent did prefer the minimum allocation and an additional 21 percent were not sure what they preferred.

RECOMMENDATION: Maintain a base allocation of $100,000 for all recipients.

Question: If there continues to be a base allocation, should multiple bases be allowed?

As a result of the merging of two or more transit recipients, each with their own base allocation, some Section 5311 recipients currently receive more than one base allocation. Allowing this encourages consolidation of services, which enhances performance and efficiency. However, the result is that some recipients receive multiple bases by virtue of the sequence of service delivery, while other recipients, who may serve more communities and a wider geographic area, receive only a single base.

Survey Results
Should multiple bases be eliminated?
A majority (55 percent) of survey respondents agreed that multiple bases should be eliminated, with another 28 percent “not sure” Only two providers currently have multiple bases, so the impact is limited, and the impact on those two providers is eased by the guaranteed 95 percent minimum allocation.

**RECOMMENDATION:** Eliminate multiple bases.

**START-UPS**

*Question: Should start-ups be accommodated and, if so, how should their initial funding be established?*

Transit service to a community that meets Section 5311 eligibility criteria but did not previously have transit service is called a “start-up.” Under the current system start-ups are added on a case-by-case basis. Criteria used to evaluate potential startups are the following:

- Must meet the Federal requirements for Section 5311 funding.
- Must serve previously unserved populations/areas.
- Evaluation of a service plan and budget
- Level of community involvement
- Local support
- Potential for consolidation with an existing provider

**Survey Results**

*Should start-ups be considered for Section 5311 funding?*

A total of 62 percent of survey respondents believed that start-ups should continue to be considered for Section 5311. Only 14 percent thought that they should not be considered.

**RECOMMENDATION:** Continue current process for accommodating start-ups.
APPENDIX A – SURVEY #1 RESULTS

Survey and Interview Methodology

Survey recipients were identified as the 35 Oregon public transportation providers who currently receive Section 5311 Formula Grants for Rural Areas Program funds. The survey was available online between Wednesday, September 6, 2017 and Saturday, September 30, 2017.

The survey asked three primary types of questions. For the first part of the survey, survey takers were asked to rank how agreeable they were to certain aspects of the current 5311 allocation process. This was rated on a five-point scale: strongly disagree, disagree, neither agree nor disagree, agree, and strongly agree. Next, survey takers were asked to rank how important to them various aspects of the allocation formula are also on a five-point scale: not important, limited importance, somewhat important, important, and very important. Finally, survey takers were asked how their current 5311 funding allocation is spent, and how much of their total funding comes from 5311. There were three opportunities in the online survey for survey takers to input comments. In total, 19 surveys were completed.

Of the stakeholders who were sent the online survey, nine were also contacted for in-depth telephone interviews. The stakeholders were emailed a copy of the survey and asked to provide convenient times for a short telephone interview. There was follow-up with additional emails or telephone calls for those who did not initially respond. Telephone follow-up also occurred if there were email delivery problems or staff changes (such as retirements). Eight of the nine interviewees identified were interviewed.

Those interviewed were asked the same questions as asked in the online survey. Interviewees were encouraged to comment after each question was asked. It was not evident if those who provided in-depth interviews had also taken the online survey. Therefore, their responses to the survey questions provided during the phone interviews are not included in the survey findings to avoid duplication.

A copy of the survey is included in Attachment A; and a list of interview participants is included in Attachment B.
Survey Results and Interview Summary

The following provides an overview of the summary responses as well as common comments from interviews.

**Question 1:** The system does not adequately reward good performance (more miles and higher ridership) due to the five percent cap on increase.

Nearly 50% of survey respondents disagree (15.8%) or strongly disagree (31.6%) with the statement: the system does not adequately reward good performance. Only 26.3% were in agreement with the statement (with only 5.3% of those strongly agreeing).

Interviewees indicated that they agree with a cap on the funding increase, but that it should perhaps be increased from 5% to 10%. It appears that most of those surveyed believe that the system does, in fact, reward good performance.

**Question 2:** Agencies that do not utilize all their funding are still able to receive full funding the following allocation period.
A majority of respondents (57.9%) indicated that they believe agencies that do not use their full funding allotment should not automatically receive the formula allocation for the following period. However, there was also a sizeable number of respondents (36.9%) who did agree that on some level agencies that do not utilize their funding should be able to receive full funding the following allocation period.

Interviewees often complained that the question was written confusingly. While their responses to this question varied along the spectrum of responses, they generally consistently stated that no funding allocation should be eliminated or withdrawn without allowing the provider to explain why the funding was not used.

**Question 3:** The process makes it hard to accommodate “start-ups” (new agencies seeking Section 5311 funding).

A majority of respondents (52.6%) neither agreed nor disagreed that start-ups had a difficult time making it through the 5311 process. The remainder were fairly evenly split in agreeing or disagreeing that it is difficult to accommodate start-ups.

Interviewees noted that it is important to accommodate start-ups, but that there should be some sort of justification or requirements to demonstrate the need for joining the funding pool. Many recognized the strain adding new providers to the program has on the limited funds. Another comment was that the program should not accept a start-up that serves an area that already has a provider who receives Section 5311 funds.
**Question 4:** Some systems, due to geography, population distribution, or other factors, have greater difficulty achieving higher performance standards (revenue miles and ridership).

A large majority of respondents agreed (42.1%) or strongly agreed (36.8%) that due to geography, population distribution, or other factors, some agencies have difficulty reaching optimal revenue miles or ridership performance standards. Only 15.8% disagreed that agencies face these difficulties. A little over 5% did not have an opinion.

Interviewees continued to note that while a high-performance standard based on ridership may be difficult to achieve, the total number of revenue miles is achievable. Agencies that serve rural areas or multiple counties will travel significant miles, with a relatively low number of riders. If population and/or ridership were weighted heavily in the formula, it would have a negative impact to the providers serving the state’s more rural areas. There is general consensus that the base is very important to allow all providers to provide service.
**Question 5:** The statewide funding formula does not reflect local public transportation needs and priorities.

The needs and priorities question was a very divisive one overall, with respondents fairly even between agreeing with the statement (36.8%), disagreeing with the statement (31.6%), and neither agreeing or disagreeing (31.6%).

Similar to the survey results, the interviewees had divided responses to this question. While some indicated that the formula should not focus on community need at all since it is difficult to factor that into a statewide formula, others said that it should be included as it gets to the root of why the service is provided.

**Question 6:** Please provide other concerns you have with the current allocation process.

In general, four general themes emerged in response to the open-ended question about the current allocation process. Please refer to Appendix D for all comments.

First, about a third of individuals who provided a comment did not want to see the system changed. There were questions about why this is being looked at now and concern about if the update in 2012 had been fully implemented. Some felt that the system is fair now and others were concerned about any changes to their current funding levels.

Secondly, some felt strongly that eliminating funding based on use of funds was not a good idea. Those who commented to this effect mentioned that transit providers should be allowed to explain why they were unable to spend all their funds. Some indicated that it can be difficult to come up with matching funds.

A third theme was an observation about how funds are allocated when multiple providers serve the same area. Comments reflected that there should be coordination between providers when this is the case. There was also a question of fairness when a provider serving multiple counties and jurisdictions receives the same base as a provider with a much smaller service area.
Lastly, respondents gave suggestions on how to change the allocation. Recommendations included:

- Increasing the cap from 5% to 10% and adding a floor of -5%.
- Balancing access and the need to focus funds on providers who are serving last resort, low income, or disabled users.
- Taking geography into consideration. Although ridership may be low, the number of miles can be considerable.

**Question 7:** The process should provide for a high degree of funding stability from year to year.

![Pie chart showing 84.2%Very-important and 15.8%Important]

Every respondent agreed that the 5311 allocation process should provide for a high degree of funding stability from year to year, with 84.2% indicating it is very important and the remaining 15.8% indicating it was important. Interviewees agreed that stability was critical to the Section 5311 formula. There seems to be agreement that a discretionary program would not be the best allocation process for these funds in Oregon.
**Question 8:** The funding formula should emphasize ridership and reward improved ridership.

A majority of survey respondents felt that rewarding ridership increases was important, with 36.8% rating it as somewhat important, 36.8% as important, and 5.3% as very important. Not one respondent thought that this was not important at all.

Interviewees agreed that ridership is important, but that providing transportation opportunity is most critical, even if ridership is low. There are very rural places with low populations, but the individual rider relies on public transportation just as much as in locations with higher ridership.

**Question 9:** The funding should emphasize access to transit, rewarding increased service levels (measured as revenue miles).

Again, not one survey respondent believed that the issue of service levels was not important at all. Instead, half (50%) believed rewarding increased service levels was somewhat important, with an additional 22.2% finding it important, and 5.6% finding it to be very important to them. 22.2% of
survey respondents found that rewarding increased service levels was of limited importance to them. Similar to the previous question, interviewees indicated that getting people to where they needed to go, regardless of population, is important.

**Question 10:** The funding should reflect community need, measured as the population served.

A plurality of respondents believed that reflecting community need, measured as the population served, was either important (36.8%) or very important (10.5%) to them. 15.8% found this to only be somewhat important and 21.1% found it to be of limited importance. 15.8% of survey respondents did not believe this issue was important whatsoever.

Interviewees questioned what factor would be used to demonstrate community need. They felt that population is not always a good representation of need, as residents in extremely rural locations may need public transit just as much as those in more populated areas.
**Question 11**: The funding should emphasize connectivity between communities and between modes.

A healthy majority of survey respondents found that emphasizing connectivity between communities and modes was either important (57.9%) or very important (5.3%). Another 21.1% found this to be somewhat important to them, and 15.8% thought that this was of limited importance. However, no survey respondent believed that this wasn’t important at all. Additionally, no interviewee had a specific comment to share regarding this question.

**Question 12**: Providing a base level of funding for every provider is critical.

A large majority of survey respondents believed that providing a base level of funding to every provider was very important (52.6%) or important (31.6%). A total of 10.6% of respondents believed it had limited or no importance.

Interviewees all agreed that base funding is a critical component of the Section 5311 allocation as it ensures that there is enough funding for each provider to offer at least some level of service. The stability of this funding program is critical to the recipients.
**Question 13**: Section 5311 applications should be considered every biennium solely on the basis of meeting established funding criteria, without regard to previous funding allocations. (This would suggest a competitive rather than formula-based funding process.)

![Pie chart showing responses to Question 13](chart1.png)

Most survey respondents did not believe a competitive process would be important to the funding allocation going forward. A total of 57.9% found it to be not important at all with another 31.6% believing it would only be of limited importance. Only 5.3% thought it would be somewhat important and 5.3% thought that it would be important. Interviewees emphasized that even if a provider had a poor year, it might be an anomaly and, if their funding was based on the anomaly, they would struggle to continue to provide service.

**Question 14**: Section 5311 funding should support implementation of service as documented in approved plans, such as Transit Development Plans or Transit System Plans.

![Pie chart showing responses to Question 14](chart2.png)

A majority of respondents indicated that it was either important (36.8%) or very important (21.1%) that 5311 funds support implementation of service in documented and approved plans. Some
interviewees voiced support for using funds to implement set plans that are documented and approved.

**Question 15:** Start-ups (new providers who are eligible for the Section 5311 funding) should be accommodated.

The question of accommodating start-ups resulted in a very mixed response. Some respondents found that accommodating start-ups was either of limited importance (31.6%) or not important at all (10.5%). However, 26.3% believed it was important, with an additional 15.8% thinking it was very important.

Although there was some concern among the interviewees that available Section 5311 funds may be spread too thin, there was consensus that start-ups are important and should be accommodated. However, several interviewees would like to only allow start-ups that provide service to new areas within the state.

**Question 16:** Please provide other suggested objectives for the Section 5311 funding that are not included the above series of questions.

In general, responses to the question about suggested objectives were not only directed to the objectives, but also to criteria that a new formula should consider. This summary includes responses from the online survey as well as the interviews. Please see appendix E for comment responses.

Many responses emphasized above all else the role of 5311 funds to provide stability for rural public transportation providers. Making the allocation competitively based was generally voiced as not in concert with the objectives of the funding program.

On the topic of introducing start-ups to the funding allocation, there were again some opinions that new providers should not provide service to a geographical area that already has a provider.

People identified the following as issues to consider in developing the funding allocation:

- How Section 5311 funds fit in with the new HB2017 funds.
• Basing funding on implementation and concurrence with adopted local plans, not just Transit Development Plans or Transportation System Plans.
• Population does not reflect community need and should not be a part of the equation.

**Question 17:** During the last biennium, for what purpose(s) did you use Section 5311 funding?

In the above table, each bar represents a survey respondent. Most public transportation providers indicated that they used their Section 5311 funding on operations, with three agencies using their entire allocation on operations. Every agency who took this survey used at least half of their Section 5311 funds for operations. The next largest purpose for 5311 funds was administration. Section 5311 funds were used for capital improvements at two agencies, and only one agency used the funds for planning purposes; that agency only used 1% of their Section 5311 funds for that purpose.
**Question 18:** What percentage of your total operating cost is provided by Section 5311 funding?

The percentage of transit provider operating cost provided by Section 5311 funds ranged from just over 10% to 60%.

**Question 19:** Are there other comments you want to share regarding the current Section 5311 allocation process and possible changes to that process?

This summary includes responses from the online survey as well as the interviews to the “other comments” question.

Three key themes that were heard in response to this question:

- Recipients need stability from year to year. Do not take away funding if it is not used.
- Keep Section 5311 allocation as formula as opposed to a competitive process.
- There is a preference toward no change.

The base allocation seems to be a critical piece of funding allocation stability. Providers felt that the idea of using only performance measures to allocate the funds could result in misallocation and should not be considered. Other respondents identified the required match of the Section 5311 funding to be difficult to meet.

Several respondents commented on the critical role outreach will be in changing the allocation of the funding. There were requests to have more Section 5311 recipients sitting on the working group.
Attachment A: PTAC Stakeholder Interview Questionnaire

FTA Section 5311 Recipients:

The Public Transportation Advisory Committee (PTAC) has initiated a study to look at the current allocation method of Federal Transit Administration Section 5311 funding and evaluate potential changes to that method. This study responds to repeated concerns we have heard regarding the formula used to allocate those funds. PTAC has designated a Working Group to provide direction for the study and make a recommendation to PTAC on possible changes in the allocation process. The nine-member Working Group provides a diverse representation, both in geography and type of provider, of Section 5311 recipients.

PTAC is very interested in soliciting opinions from Section 5311 recipients as part of this process. The link below takes you to a survey of your opinions regarding the current allocation process and on funding objectives that will be used to develop and evaluate potential changes to the process. A follow-up survey will solicit your opinions on options for changes to the allocation method.

We understand how critical this funding is for providers and are committed to fully vetting any possible changes with all of you. Please note that any changes in the allocation process would not go into effect until the 2019-21 biennium, at the earliest. Section 5311 funding allocations established for the 2017-19 biennium would not be impacted.

Thank you in advance for your participation in this study.

Allan Pollock
PTAC Chair
PTAC Interviews

Dear FTA Section 5311 Recipient:

Currently, FTA Section 5311 funds in Oregon are distributed to subrecipients using the following formula:

- Minimum base funding of $100,000 per biennium ($50,000 per year) per recipient
- Additional funding based on provider revenue miles (60 percent) and ridership (40 percent)
- Allocation is to be within 100 and 105 percent of the previous allocation (no less than the previous allocation and no more than a five percent increase).

Name:

Email:

Please indicate your level of agreement with the following concerns with the current allocation process:

1. The system does not adequately reward good performance (more miles and higher ridership) due to the five percent cap on increase.
   - Strongly disagree
   - Disagree
   - Neither agree nor disagree
   - Agree
   - Strongly agree

2. Agencies that do not utilize all their funding are still able to receive full funding the following allocation period.
   - Strongly disagree
   - Disagree
   - Neither agree nor disagree
   - Agree
   - Strongly agree

3. The process makes it hard to accommodate “start-ups” (new agencies seeking Section 5311 funding).
   - Strongly disagree
   - Disagree
   - Neither agree nor disagree
   - Agree
   - Strongly agree

4. Some systems, due to geography, population distribution, or other factors, have greater difficulty achieving higher performance standards (revenue miles and ridership).
5. The statewide funding formula does not reflect local public transportation needs and priorities.
   o Strongly disagree
   o Disagree
   o Neither agree nor disagree
   o Agree
   o Strongly agree

6. Please provide other concerns you have with the current allocation process.

As a starting point for developing and evaluating potential changes to the Section 5311 allocation process, we want to establish a clear program intent with objectives to be used to evaluate optional allocation methods. Please rate the importance of the following potential objectives.

7. The process should provide for a high degree of funding stability from year to year.
   o Not important
   o Limited importance
   o Somewhat important
   o Important
   o Very important

8. The funding formula should emphasize ridership and reward improved ridership.
   o Not important
   o Limited importance
   o Somewhat important
   o Important
   o Very important

9. The funding should emphasize access to transit, rewarding increased service levels (measured as revenue miles).
   o Not important
   o Limited importance
   o Somewhat important
10. The funding should reflect community need, measured as the population served.
   - Not important
   - Limited importance
   - Somewhat important
   - Important
   - Very important

11. The funding should emphasize connectivity between communities and between modes.
   - Not important
   - Limited importance
   - Somewhat important
   - Important
   - Very important

12. Providing a base level of funding for every provider is critical.
    - Not important
    - Limited importance
    - Somewhat important
    - Important
    - Very important

13. Section 5311 applications should be considered every biennium solely on the basis of meeting established funding criteria, without regard to previous funding allocations. (This would suggest a competitive rather than formula-based funding process.)
    - Not important
    - Limited importance
    - Somewhat important
    - Important
    - Very important

14. Section 5311 funding should support implementation of service as documented in approved plans, such as Transit Development Plans or Transit System Plans.
    - Not important
    - Limited importance
    - Somewhat important
    - Important
15. Start-ups (new providers who are eligible for the Section 5311 funding) should be accommodated.
   - Not important
   - Limited importance
   - Somewhat important
   - Important
   - Very important

16. Please provide other suggested objectives for the Section 5311 funding that are not included the above series of questions.

17. During the last biennium, for what purpose(s) did you use Section 5311 funding?
   - Operations: _____ percent of funding
   - Administration: _____ percent of funding
   - Capital: _____ percent of funding
   - Planning: _____ percent of funding

18. What percentage of your total operating cost is provided by Section 5311 funding?

19. Are there other comments you want to share regarding the current Section 5311 allocation process and possible changes to that process?
## Attachment B: Interview List

<table>
<thead>
<tr>
<th>Region</th>
<th>Organization</th>
<th>City</th>
<th>Contact Person</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-Profit</td>
<td>Community Connection of Northeast Oregon</td>
<td>Baker City</td>
<td>Mary Jo Carpenter</td>
</tr>
<tr>
<td>Region 5</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Non-Profit</td>
<td>Commute Options</td>
<td>Bend</td>
<td>Kim Curley</td>
</tr>
<tr>
<td>Region 4</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>COG</td>
<td>Central Oregon Intergovernmental Council</td>
<td>Bend</td>
<td>Karen Friend</td>
</tr>
<tr>
<td>Region 4</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tribe</td>
<td>Confederated Tribes of the Umatilla Indian Reservation</td>
<td>Pendleton</td>
<td>Susan Johnson</td>
</tr>
<tr>
<td>Region 5</td>
<td>- Kayak Transit</td>
<td></td>
<td></td>
</tr>
<tr>
<td>District</td>
<td>Sunset Empire Transportation District</td>
<td>Astoria</td>
<td>Jeff Hazen</td>
</tr>
<tr>
<td>Region 2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>City</td>
<td>City of Sandy</td>
<td>Sandy</td>
<td>Andi Howell</td>
</tr>
<tr>
<td>Region 1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>City</td>
<td>City of Woodburn</td>
<td>Woodburn</td>
<td>Kathy McClaksey</td>
</tr>
<tr>
<td>Region 2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>County</td>
<td>Douglas County</td>
<td>Roseburg</td>
<td>Dennis Pinheiro</td>
</tr>
<tr>
<td>Region 3</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>District</td>
<td>Basin Transit</td>
<td>Klamath Falls</td>
<td>Contacted, No Response.</td>
</tr>
<tr>
<td>Region 4</td>
<td></td>
<td></td>
<td></td>
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</table>
## APPENDIX B – SURVEY #2 RESULTS

**Question 1:** Should we continue to use service miles and ridership as Section 5311 performance measures?

<table>
<thead>
<tr>
<th>Option</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>29</td>
</tr>
<tr>
<td>No</td>
<td>0</td>
</tr>
<tr>
<td>Not Sure</td>
<td>0</td>
</tr>
</tbody>
</table>

**Question 2:** If service miles and ridership are used, what should the split be?

<table>
<thead>
<tr>
<th>Split</th>
<th>Count</th>
</tr>
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<tbody>
<tr>
<td>50 percent service miles/ 50 percent ridership</td>
<td>5</td>
</tr>
<tr>
<td>60 percent service miles/40 percent ridership</td>
<td>19</td>
</tr>
<tr>
<td>75 percent service miles/25 percent ridership</td>
<td>4</td>
</tr>
<tr>
<td>Other</td>
<td>1</td>
</tr>
</tbody>
</table>

**Question 3:** What should the guaranteed minimum funding levels be?

<table>
<thead>
<tr>
<th>Allocation</th>
<th>Count</th>
</tr>
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<tbody>
<tr>
<td>100 percent of previous allocation</td>
<td>11</td>
</tr>
<tr>
<td>95 percent of previous allocation</td>
<td>18</td>
</tr>
</tbody>
</table>

**Question 4:** How should the maximum be determined?

<table>
<thead>
<tr>
<th>Method</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Use a cap (such as 10 percent)</td>
<td>17</td>
</tr>
<tr>
<td>Use proportional funding</td>
<td>11</td>
</tr>
<tr>
<td>Use some other maximum</td>
<td>1</td>
</tr>
</tbody>
</table>

**Question 5:** Should multiple bases be eliminated?

<table>
<thead>
<tr>
<th>Option</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>16</td>
</tr>
<tr>
<td>No</td>
<td>5</td>
</tr>
<tr>
<td>Not sure</td>
<td>8</td>
</tr>
</tbody>
</table>

**Question 6:** Should the base allocation be replaced by a guaranteed minimum allocation?

<table>
<thead>
<tr>
<th>Option</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>9</td>
</tr>
<tr>
<td>No</td>
<td>14</td>
</tr>
<tr>
<td>Not sure</td>
<td>6</td>
</tr>
</tbody>
</table>
Question 7: If the base allocation is replaced with a minimum guarantee, what should that minimum amount be?

<table>
<thead>
<tr>
<th>Option</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>$100,000 per biennium (matches current allocation)</td>
<td>11</td>
</tr>
<tr>
<td>Increased to keep pace with inflation</td>
<td>13</td>
</tr>
<tr>
<td>Recalculated based on current cost estimate to operate a single vehicle</td>
<td>5</td>
</tr>
</tbody>
</table>

Question 8: Should start-ups be considered for Section 5311 funding?

<table>
<thead>
<tr>
<th>Option</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>18</td>
</tr>
<tr>
<td>No</td>
<td>4</td>
</tr>
<tr>
<td>Not sure</td>
<td>7</td>
</tr>
</tbody>
</table>

Question 9: Should the current criteria continue to be used?

<table>
<thead>
<tr>
<th>Option</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>20</td>
</tr>
<tr>
<td>No</td>
<td>2</td>
</tr>
<tr>
<td>Not sure</td>
<td>7</td>
</tr>
</tbody>
</table>

Comments on Performance Criteria

- I have answered this but feel really unqualified to answer as I would be unable to provide service if my frontier community received fewer funds. I don't want an answer to reflect that end result. Funds are far too tight as is.
- I feel it is an equitable way to disperse funding.
- The modestly larger emphases on service miles provides some funding stability for services in low population areas that travel considerable distances.
- I believe the performance measures and current split of 60% service miles/40% ridership is fair and equitable.
- No criteria will be perfect for all parties concerned. I believe the 60/40 service miles to ridership represents the best option for the largest number if providers.
- I support the 60/40 split because it recognizes that passenger trips in rural areas have a longer distance. I agree that revenue miles should be weighted more than passenger trips. This would provide incentive for rural services to not concentrate services in the more densely populated areas and provide more incentive to ensure residents living in less densely populated areas get service.
- Rural communities often do not have high ridership but cover considerable miles in providing that service. Increasing the ratio level the "playing field" between rural and urban.
- 80/20
- Performance criteria must be only a part of the formula. It is critical that the base remain. 60/40 is acceptable. If there is an interest in changing it I suggest 50/50 (and certainly not moving to 75/25).
• This may come later in survey but entities that are governing bodies with responsibilities as STF agency and oversight of a larger area should receive a little more funding than just a single provider without these responsibilities

• I do believe that this does effect recipients that provide demand response and sub contract service. Deadhead miles are not recorded. We therefore have fewer miles to report than a fixed route system that is travelling on a route and collecting miles whether passengers are on board or not.

• I thought that population was also a useful tool because that indicates how many people we’re serving, not just number of rides and miles. Some rural areas the average ride is only 2-5 miles, but that doesn't mean the rides aren't less necessary because a lot of those rides are needed to get people to places who wouldn't otherwise be able to. I do realize that population is hard to determine with some programs that overlap with others and maybe that is part of the reason it was taken out of the formula, but when it comes to looking at one community/area, I think it is a good indicator.

• The amount of population in the area being served should also factor into the equation.

• Rural counties travel far distances with low ridership numbers.

Comments on Minimums/Maximums

• I like the proportional funding for the max, it spreads the dollars out fairly.

• My biggest worry is the impact the 95% cap could have on very small services that could potentially be impacted by temporary short term events (example: lengthy snow events shutting down service for an extended period of time or some other unusual event). Without a guaranteed core base of funding, these services may not have the flexibility to absorb a temporary loss. I like the 95% in terms of being equitable but is it really a good idea? Mixed feelings on that.

• The minimum 95% helps protect programs and retain service but encourage performance improvement. a 10% max cap rewards improvement but yet does not take an excessive amount out of the fun, further limiting the 95% group. I am concerned on situations where a service has many service miles but a very low ridership count. We should no reward for low ridership on long routes. This is very expensive cost per ride & per mile service. Other service options should be offered for high cost per ride routes.

• I support the 95% minimum funding level consideration. This would increase the allocation model's redistribution of Section 5311 funds. Agency’s should be able to plan accordingly and the new STIF monies should provide agencies more solvency.

• I am opposed to making a change to 5311 formula funding at this time. Providers have taken a 17% reduction in STF funds already. HB2017 funds may take years to build up and the Legislature may make cuts to other transit funding offsetting those dollars. Too much is up in the air right now to be messing with 5311 at this time.

• Consider CPI. At the 100% minimum level you are generally receiving less revenue as costs are increasing. So at 100% plus performance hopefully that covers CPI of expenses.

• It is fair and equitable to reward programs that increase service. And that is balanced by providing a little less money to programs that have decreased mileage/ridership. It should be noted that a 5% decrease over two biennia is not a small net sum—if we assume an annual increase cost of service of about 5%. Over four years this would result in a "delta" of 30% (20% increase in expenses and a 10% decrease in Section 5311 funding). It is important to be fair in
balancing increases and decreases. If a program, for example, receives a 10% increase based on increased mileage/ridership and then has a significant decrease the following biennia it may be fair to return the program to the prior level of funding (10% less) rather than "protect" it with a 5% floor. We should also take into some consideration the history of the program. If a program, for example, provided 200,000 annual rides many years ago and the ridership was subsequently reduced to 150,000 (with the same allocation) it would seem unfair to grant a 10% increase if the ridership then increased to 175,000 the following biennium. 10% seems like a fair cap (and may help prevent large fluctuations for a few programs). But there should perhaps be a provision for special circumstances--where an increase of more than 10% could be requested/approved based on unique circumstances--approved by RPTD Administrator after review by PTAC.

- Stability is important as is performance so 95%. A system that is improving deserves an increase but not at the expense of other systems also improving, again it is about stability so cap at 10%.
- Add some criteria for governing bodies to receive more, at least 100% of previous year but ideally 10% more than provider without these responsibilities.
- What if a recipient has a one year anomaly? Is there a way to factor this in when making funding reduction decisions?
- I think it's great that we're talking about minimum levels and caps, but that is really only buying some of us a little bit of time and some services will really suffer and some will bring in much more through the proposed formula changes. With my program, we'd be one of the ones cut, but our ridership increased by 5% last year and prior to that, it has increased by almost 40% in 4-5 years. And, we're maxed out and providing that level of service with fewer FTE in the support area. We have turned over every rock over the years (BETC/EIP, etc.) in order to find funding and we've also been very conservative at the same time and turned away capital funding if we felt like we could get by without it. I realize most other providers probably do the same thing and we should be answering these questions trying to apply the best approach for all programs involved, but this is part of the reason I would be hesitant changing too much.
- Sustainability is necessary to provide reliable public transportation. Small agencies cannot continue without a reliable base to budget with.

**Comments on Base Allocations**

- I'm very unclear on this one so I'm not sure I have a solid opinion. I hate to see an impact that shuts down rural service but also think it is very appropriate for funds to be distributed based on ridership/miles or some other performance factor.
- The base allocation is the most difficult for me to respond to.
- The savings on eliminating the few service with a multiple base is not a large $$ amount in the overall scope of the total 5311 budget. A few rural areas will be impacted with a huge impact on their overall budgets. The add back into the 5311 fund will be a minor increase in the average budget for all 5311 recipients.
- Since costs are always rising I support a method to keep pace with inflation.
- These recommendations seem in conflict with each other. How do you eliminate the base but have a 95% minimum funding guarantee? It is not clear how these things work together but it seems the net effect is to lower dollars to many providers and I am opposed to this.
- The cost estimate to operate a single vehicle could vary widely by service provider.
Many agencies will be negatively impacted by funding cuts.

Question 8 and 9 are somewhat confusing. First, the history is somewhat cloudy. The concept of a base was NOT specially linked to the cost of operating a single vehicle. It was based on the general concept that there is a basic cost of opening the doors of a program. Also, at the time there were three factors—mileage, ridership and population. Population was difficult to administer (where there were multiple transit programs in an area) and population by itself is not directly linked to service (some areas with a small population were well served with robust service whereas some areas with larger populations had limited service). When population was eliminated as a factor it was generally agreed that the base was a critical factor of the "three legged funding stool". It is critical to keep the base in order to address the enormous diversity of programs in the state. Including balancing programs that provide mostly demand significant response service to a limited geographic areas with program that provide limited ridership but very lengthy trip legs. The $100,000 base must be retained. An increase liked to inflation would be helpful but is not critical. Since the FTA allocation to Oregon may remain at about the current level, it is more important—and equitable—to instead allow for an increase of up to 10% to programs which increase ridership mileage. The elimination of so-called multiple bases is a complex item. It may appear "fair" but if you look closely at the history of Community Connection of NE Oregon it was done, I think, to facilitate coordination and efficiency. Having one program (with three bases) was, in the end, a more reasonable/equitable approach than if the programs had remained separate and therefore eligible for three bases. Under no circumstances should the discussion expand to "how many current programs in one country receive funds?" or to a formula that would allow current programs to separate into multiple programs for the singular purpose of collecting separate bases. The current base—and the allocation method base to current programs (including CCNO) seems fair and equitable. No reason to change it.

Due to stability and the high numbers of organizations that may see funding decrease, even if slightly, I do not currently support removing the base.

Eliminating multiple base per program that receives multiple bases will save a very small amount of funds but will have a huge impact on some of the small rural programs in rural areas.

The idea of a base allocation was intended as a way to "open the door" for business. The one thing that doesn't make sense to me is to have multiple bases allowed for one office or manager. Even if there are multiple programs under one roof, the number of rides and miles used in the formula would increase the allocation received for their program(s).

Comments on Start-ups

It's hard to carve up the pie and make it smaller for everyone. I wonder how STIF can play into this discussion?

Providers are having issues with the 5311 allocation process which infers to me that they are worried about their 5311 allocations. If we continue diluting this source of funding with start-ups, this funding may soon become unable to assist in maintaining current levels of service.

It depends on how they are funded - taking dollars away from current programs is not the answer!

I have concerns allowing start ups as that means existing service is reduced to allow for new service. Saying that I get that it is good to provide service to areas not being served now.

allocated based on the performance criteria rather than a base minimum
"Starts ups" should be eligible for finding. But generally, Section 5311 funds should not be used to support the initial "start up". If a community wishes to start service it should first establish a pilot project (using local funds, STF funds, Section 5310 funds, discretionary grant funds and other resources). If the pilot project is successful the community can thereafter apply for Section 5311 funds using the same criteria as all other programs.

The current criteria is fine except we may want to add language that directs the provider to STIF funds first as STIF is intended for new connections.

HB2017 funding levels for the "start up" regions, need to be taken into consideration, which would be in addition to local support.

I believe it is good to consider other providers, but only if it is an area that isn't being served and possibly can't be served from an existing provider. I'm assuming the community/area would have to show a need and would also have to show that it would meet some performance measures at a certain level. I think the multiple-bases definitely need to go away if we're potentially adding new programs.

The current general public rural transportation service providers have limited funding. Reducing the funding for startups will destabilize the current transit system.

Additional Comments on Section 5311 Funding

- My concern is that if not careful those of us in frontier and rural Oregon could suffer with changes. I would ask that our small size not work against us. It costs as much or more for us to run our programs than those in the metro areas. We have fewer funding streams to draw from and our communities depend on us. Any change should not end in a net loss to us out here.

- I don't feel like my responses have been definitive but I have not been attending these meetings so I've missed a lot of the discussion. I appreciate the hard work everyone has been putting into addressing possible changes.

- If start-ups continue, I believe the current criteria meets the need to show financial and managerial responsibility for a successful start-up program.

- I was happy to learn the transit community supports the usage of an allocation method and the usage of the 60/40 revenue mile and passenger trip allocation model.

- Yes - this is simply not the right time to change things when those changes could be very hurtful to small providers, in the context of other possible changes. We should wait until the 2019-21 Biennium and see how things shake out.

- I'm worried that now with the STIF funding people are going to start taking away other grant money. Then we're still in the same situation, only worse because the perception will be that the STIF monies should be enough despite the loss of funding in other areas.

- Postpone any changes to 2021-2023. Too many unknowns in the coming biennium including HB 2017, STF and Section 5310 funding and the (potentially different) impacts on different parts of the state. Thank you for developing the spreadsheet that provides estimates for each program for each alternative. Everyone needs to clearly understand the potential impact. This information needs to be updated--with any revisions proposed by the work group--using the same data that was used for the allocation of 2017-2019 funds. Final comment-- please do NOT eliminate the $100,000 base.

- Will something be sent out to all 5311 providers showing impact of changes prior to decision. There may need to be time for others in the community to weigh in.
Thank you for reaching out to the service providers for feedback. I'm sure we have a variety of answers, but hopefully it is helpful. I don't know the complete big picture with all of transportation in Oregon and the individual needs of all providers, but would hope the group opts to not change the formula or change it for the betterment of the majority of the providers and that those who will lose won't be too much and those that will receive more truly need it and run their programs as conservatively as all others.