

Major Changes Summary

ODOT State Management Plan (SMP) 2015 – 2025

Overall Comments:

- The 2025 SMP has been reorganized into a new layout where each funding program's requirements are described under each SMP required topical area rather than broken down by individual program area chapters. For example, the eligible subrecipients that can apply for FTA funding through ODOT are all described under Section 2.4 Eligible Subrecipients, broken down by program, rather than individually separated by different program sections in the previous SMP.
- PTD's name has been updated throughout the 2025 SMP from the previous name of Rail and Public Transit Division to the current Public Transportation Division (PTD).
- The Special Transportation Fund (STF) Program has been removed from the 2025 SMP as the program was rescinded by the Oregon State Legislature and rolled into the Statewide Transportation Improvement Fund (STIF) Program.
- The Section 5303 and 5309 programs has been removed as they are not a required elements to be included in the SMP and PTD's involvement in Section 5303 and 5309 funding is minimal.
- A new section was added that aggregated all subrecipient reporting requirements into one location, Section 4.8 Reporting Requirements.

The following chart is meant to act as a crosswalk to indicate where the 2015 SMP elements have been reflected in the current 2025 SMP with an explanation of any major changes. The areas that have been eliminated are indicated in the chart below as well.

2015 SMP Area	2025 SMP Area	Comments/Major Changes
Chapter I Introduction	Chapter I Overview and Purpose	No major changes
1.1 Document Purpose	Section I Overview and Purpose	No major changes
1.2 Agency Mission	1.2 ODOT Mission and Goals	No major changes
1.3 State Policy Guidance	1.2 ODOT Mission and Goals	Updated dates of the OTP and included the most recent goals of the OTP and the Oregon Public Transportation Plan (OPTP).
1.4 Program & Authority	1.1 Designated Administrative Entity	The City of Milton-Freewater has been removed as a recipient of Section 5307 funding as the City decided not to participate in the funding program in the Walla Walla urbanized area.

1.5 Roles and Responsibilities	2.2 Roles and Responsibilities	Added subrecipient responsibilities addressing the UEI number, SAM.gov registration, and FTA certifications and assurances.
N/A	1.3 Communications	New section added to direct communications concerning ODOT's transit programs to the correct personnel
Chapter II Brief Overview of Programs	Chapter II Program Administration introduction	No major changes
2.1 Formula Grants for Rural Areas (5311)	Chapter II Program Administration introduction	
2.2 Enhanced Mobility of Seniors and Individuals with Disabilities Program (5310)	Chapter II Program Administration introduction	
2.3 Bus and Bus Facilities Program (5339)	Chapter II Program Administration introduction	
2.4 Special Transportation Fund Program	Removed	The STF program was rescinded by the Oregon State Legislature and rolled into the pre-existing STIF program. For the requirements regarding the STIF program, readers are referred to the STIF-STN Guidebook on ODOT's website.
2.5 Transit Planning Program	Chapter II Program Administration introduction	Renamed to match the current Section 5304 Statewide Transportation Planning Grant program name. The program overview description is included in the introduction of Section II and the program requirements and administration procedures are included in the new various sections of Chapter III Programming and Planning relating to Section 5304.
2.6 Mass Transit Vehicle Replacement Program	Chapter II Program Administration introduction	Renamed to match the current Vehicle Replacement Program name. The FHWA Surface Transportation Program name was updated to the current Surface Transportation Block Grant (STGB) program.
2.7 Transportation Options Program	Removed	Removed as this is not a required element of the SMP.

2.8 Transit Network Program	Chapter II Program Administration and 3.3 Intercity Bus Program	Renamed to match the current Statewide Transit Network program name. The program overview description is included in the introduction of Section II and the program requirements and administration procedures are included in the new 3.3 Intercity Bus Program.
2.9 Special Projects	Removed	Removed as this is not a required element of the SMP.
N/A	2.1 Program Goals and Objectives	Added description of the ODOT rural consultation and tribal consultation processes for statewide planning efforts.
Chapter III Program, Grant, and Financial Management Procedures	Chapter IV Post Award Management & Requirements introduction	Removed the links to other federal regulations.
3.1 RPTD Program Administration	3.5 State Administrative Set-Aside Ch. VI Post Award Management & Requirements introduction 4.1 Project and Financial Management	Examples of administrative expenses were added in Section 3.5. Removed mention of FFATA reporting as it is not a required element of the SMP.
3.2 Project Management	4.1 Project and Financial Management 4.4 Audit 4.8 Oversight	Update references to audit requirements in 2 CFR 200 including the Single Audit threshold to \$1,000,000 in federal funds expended. All audit requirements were relocated to Section 4.4 Audit. Responses to subrecipient noncompliance matters were added to Section 4.8.
3.3 Project Monitoring/ Project Compliance		
3.4 Reporting and Recordkeeping Requirements	4.4 Award Close Out 4.7 Reporting Requirements	All reporting requirements in the 2015 SMP were aggregated into one section in the 2025 SMP. The recordkeeping requirements have been updated to reflect the five year records retention requirement from the state which is more restrictive than the federal requirement.

3.5 Procurement and Contracting	4.5 Procurement	Updated references to outdated OMB regulations and replaced with current 2 CFR 200 requirements.
3.6 Public Involvement	3.7 Public Involvement & Private Sector Participation	Simplify the PTD public involvement responsibilities by detailing the basic FTA requirements for public involvement and instead refer to ODOT's public involvement plan for more information.
3.7 Planning and Coordination (including Program of Projects Development)	2.3 Coordination 3.4 Program of Projects 3.7 Public Involvement & Private Sector Participation	Updated the responsible office for STIP development and coordination from the Highway Program Office to the Financial Services Division. Added more information on the development of the POP including the varying levels of approval authority granted between the PTD Administrator, ODOT Director, and the OTC.
3.8 Grant Protest Procedures	3.8 Grant Protest Procedures	No major changes
3.9 Charter Bus Protections	6.1 Charter Service	Redundant charter definitions were removed and the current Charter Service Report Form link was corrected. Annual certification and assurances requirements have been relocated under 2.2 Roles and Responsibilities under the Subrecipient Agency responsibilities subsection which are included as part of ODOT's subrecipient agreements. This is same change throughout the entire SMP.
3.10 School Bus Regulations	6.2 School Bus Service	No major changes
3.11 Safety Authority	Removed	Removed as this is not a required element of the SMP.
3.12 Drug-Free Workplace and FTA Drug and Alcohol Testing Regulations	6.3 Drug-Free Workplace Act and Drug and Alcohol Program Requirements	Update the DAMIS recordkeeping requirement to match the federal requirement of five years.
3.13 Labor Protection	6.4 Labor Protections	Clarify that PTD will comply with labor reporting requirements as part of its FTA application process and remove the requirement for subrecipients to annually provide

		information on unions operating in their geographic area.
3.14 Environmental Protection	6.5 Environmental Review Process	Dramatically updated to match the current practices employed by ODOT when conducting NEPA reviews.
3.15 Lobbying	6.6 Lobbying	Updated name of ODOT Governmental Relations office. Clarified the requirement to report on lobbying activities for anytime a subrecipient receives a subaward from ODOT in excess of \$100,000.
3.16 Debarment and Suspension	4.5 Procurement	No major changes
Chapter IV Civil Rights	Chapter V Civil Rights	Updated the name of OECR and their roles and responsibilities under the civil rights areas. Predominately shift OECR's responsibility of closing out civil rights related compliance findings to PTD with OECR brought in for technical assistance and expertise. Include a more robust description of how PTD ensures equitable funding availability through its call for projects application processes.
4.1 Title VI	5.1 Title VI and Limited English Proficiency	Remove subrecipient responsibility to submit an annual Title VI report and instead refer to the APR quarterly reporting. Add essential Title VI Program requirements description.
4.2 Environmental Justice	Removed	Removed as this is not a required element of the SMP and the subject is already covered by the Title VI and Environmental Review Process sections of the 2025 SMP.
4.3 Disadvantaged Business Enterprise	5.3 Disadvantaged Business Enterprise	Revise DBE program development threshold and meet updated DBE final rulemaking from 2024 to reflect the new Tier I and Tier II DBE program requirements for recipients and subrecipients of FTA funds. Add essential DBE Program requirements description.
4.4 Equal Employment Opportunity	5.2 Equal Employment Opportunity	Added EEO laws and regulations description and essential EEO

		Program requirements description. Revised subrecipient EEO Program submission to OECR from every three years to every four years.
4.5 Limited English Proficiency (LEP)	5.1 Title VI and Limited English Proficiency	Combined with the Title VI section as LEP requirements are derived from Title VI's application.
Chapter V Americans with Disabilities Act	5.4 Americans with Disabilities Act	Removed requirement to develop and submit an annual complementary paratransit plan as this is no longer required. Removed the annual desk review responsibility under PTD as the compliance review process examines applicable subrecipient compliance with these ADA requirements.
5.1 Summary of ADA Requirements	5.4 Americans with Disabilities Act	
5.2 ADA Service Provisions	5.4 Americans with Disabilities Act	
5.3 Training	5.4 Americans with Disabilities Act	
Chapter VI Capital Procurement and Management of Capital Assets	No information to transfer in the introductory section.	N/A
6.1 Procurement and Management of Equipment	4.5 Procurement 4.6 Asset Management	Updated capital definition to align with the new definition from OMB set at a value of \$10,000 or more and a life expectancy of one year or more. Updated useful life benchmarks for non-revenue rolling stock equipment. Added information on procurement requirements surrounding full and open competition and the methods of procurement, ensuring the most current federal thresholds are specified.
6.2 Vehicle Procurement and Leasing	4.5 Procurement 4.6 Asset Management	Updated links to PTD guidance regarding how to purchase a vehicle. No major changes in leasing.
6.3 Vehicle Insurance	4.6 Asset Management	No major changes Removed requirement for subrecipients to submit maintenance plans with every application.
6.4 Vehicle Maintenance		
6.5 Warranty		
6.6 Vehicle Useful Life and Disposition	4.6 Asset Management	Updated vehicle disposition procedures and the sale proceeds that would need to be returned to

		the FTA under the defined circumstances updated in the BIL.
6.7 Buy America Provisions, Pre-Award/Post-Delivery Certifications, and New Model Bus Testing	4.5 Procurement	Removed the PTD responsibility for reviewing Buy America waivers as PTD would not be involved in this decision, only the FTA.
6.8 Force Account	Removed	Removed as this is not a required element of the SMP.
6.9 Subrecipient Closure	4.8 Oversight	No major changes
Chapter VII Land, Buildings, and Facilities	No information to transfer in the introductory section.	N/A
7.1 Maintenance Requirements	4.6 Asset Management	No major changes
7.2 Restrictive Covenants and Other Property Agreements		
7.3 Disposition of Property		
7.4 Facility Useful Life Standards		
Chapter VIII Formula Grants for Rural Areas Program (5311)	Chapter II Program Administration introduction	Relocated the general description of the program under the Section 5311 program overview in the Section II introduction.
8.1 Program Goals	2.1 Program Goals and Objectives	Goals updated to align with the most recent call for projects solicitation and the most recent FTA Circular 9040.1H.
8.2 Eligible Subrecipients	2.4 Eligible Subrecipients	Included a description of the circumstances that must be followed if/when a 5307 direct recipient also receives funding as a 5311 subrecipient.
8.3 Eligible Services and Service Areas	2.5 Eligible Service Areas and Services	No major changes
8.4 Eligible Assistance Categories	2.6 Eligible Assistance Categories	Updated to reflect the latest listing of capital projects since being combined with the 5339 program in the most recent FTA Circular 9040.1H. Updated capital definition to align with the new definition from OMB set at a value of \$10,000 or more and a life expectancy of one year or more.

8.5 Local Match and Local Funding Requirements	2.7 Federal/Local Share and Funding Requirements	Included a brief description of the sliding scale and how it applies to specific projects differently under the 5311 program.
8.6 Project Selection Criteria and Funds Distribution Method	3.1 Method of Distribution of Funds 3.2 Project Selection Criteria	Updated the description of how PTD administers its funding programs through the formula funding and discretionary funding programs. Included the factors that PTD utilizes in the selection of 5311 formula funding program projects. The Method of Distribution of Funding section includes description of new program subrecipients as eligible to apply for funding as well.
8.7 Start-up Program		
8.8 Basic Grant Management Policies	4.2 Grants Management	No major changes
8.9 Training Requirements	4.8 Oversight	Removed most information besides that subrecipient may be required to attend training as part of any compliance oversight deficiency and corrective action. Training requirements are not a required element of the SMP.
8.10 Rural National Transit Database	4.7 Reporting Requirements	Added APR quarterly reporting and revised the NTD reporting as an explicit requirement. Included a description of OPTIS used for reporting purposes.
Chapter IX Transit Network Program	3.3 Intercity Bus Program	Updated the Key Program focus areas to align with the current program requirements that also align with the OTP goals. Added a description of the Oregon POINT intercity bus service and information on program goals taken from the 2024 STIF-STN Guidebook.
9.1 Program Overview		
9.2 Program Goal		
9.3 Key Program Focus Areas		
9.4 Program Resources		
9.5 Intercity Bus Discretionary Grants (5311(f))	Various parts of Chapter II	The eligible subrecipients, services, assistance categories, federal/local match were included as part of the program requirements under 5311 with separate call out for 5311(f). Project selection criteria and funding

		distribution was relocated in Sections 3.1 and 3.2.
Chapter X Transit Assistance Program (TAP)	3.6 Rural Transit Assistance Program	No major changes Updated to the current information and URL links available on the ODOT website detailing RTAP scholarships and applications.
10.1 Purpose		
10.2 Scholarships		
10.3 Training		
10.4 TAP Management		
Section XI Bus and Bus Facilities Program (5339)	2.1 Program Goals and Objectives	No major changes
11.1 Program Goals		
11.2 Funding		
11.3 Eligible Subrecipients	2.4 Eligible Subrecipients	No major changes
11.4 Eligible Services	2.5 Eligible Service Areas and Services 2.6 Eligible Assistance Categories	Removed bicycle projects as an eligible project as that has been moved to the Section 5311 program under then most recent FTA Circular 9040.1H. Eligible capital projects have been aligned with the new circular that combined 5311 and 5339 program requirements.
11.5 Local Match and Local Funding Requirements	2.7 Federal/Local Share and Funding Requirements	Removed bicycle project funding requirements as that project type has been wholly moved under the Section 5311 program.
11.6 Project Selection Criteria and Fund Distribution Method	3.1 Method of Distribution of Funds 3.2 Project Selection Criteria	Updated the description of how PTD administers its funding programs through the formula funding and discretionary funding programs. Included the applicant evaluation factors that PTD utilizes in the selection of 5339 discretionary funding program projects based on the OPTP. The discretionary grant program no longer utilizes the Mid-Grant Cycle name and instead is simply referred to as the discretionary grant call for projects, conducted biennially not annually as previously stated.

11.7 Basic Grant Management Policies	4.2 Grants Management	No major changes
11.8 Reporting Requirements	4.7 Reporting Requirements	Added APR quarterly reporting and NTD reporting as explicit requirements. Included a description of OPTIS used for reporting purposes.
Section XII Enhanced Mobility of Seniors and Individuals with Disabilities Program (5310)	Section II Program Administration introduction 2.6 Eligible Assistance Categories 2.8 Fund Transfer	The overall description of the program has been relocated to the program overview description of Section 5310 in the introduction of Section II Program Administration. The description of the 55/45 traditional vs. nontraditional project split has been relocated to the 2.6 Eligible Assistance Categories. The description of the funding transfers from STP (now STBG) has now been coalesced into one section describing fund transfers.
12.1 Program Goals	2.1 Program Goals and Objectives	No major changes. Incorporated the 5310 program measures and goals into one description under the Section 5310 program in Section 2.1.
12.2 Eligible Subrecipients	2.4 Eligible Subrecipients	Rename public agency as a state and local governmental authority. Explicitly added mass transit districts as eligible public agencies to coordinate public transportation services. Rename recipients of STF funding to Lead Agencies for coordination purposes.
12.3 Eligible Assistance Categories	2.6 Eligible Assistance Categories	No major changes
12.4 Project Selection Criteria and Fund Distribution Method	3.1 Method of Distribution of Funds 3.2 Project Selection Criteria	Updated the description of how PTD administers its funding programs through the formula funding and discretionary funding programs. Included the applicant evaluation factors that PTD utilizes in the selection of 5310 discretionary funding program projects based on the OPTP. The discretionary grant program no longer utilizes the Mid-Grant Cycle

		moniker and instead is simply referred to as the discretionary grant call for projects, conducted biennially.
12.5 Local Match and Local Funding Requirements	2.7 Federal/Local Share and Funding Requirements	Included a more descriptive explanation of the local match sources available for Section 5310 subrecipients/projects.
12.6 Training Requirements	4.8 Oversight	Removed most information besides that subrecipient may be required to attend training as part of any compliance oversight deficiency and corrective action. Training requirements are not a required element of the SMP.
12.7 Basic Grant Management Policies	4.2 Grants Management	No major changes. Combined with the capital, planning, and operating grant management principles from other program areas such as 5311 and 5304.
12.8 Reporting Requirements	4.7 Reporting Requirements	Added APR quarterly reporting. NTD reporting only applicable to certain 5310 subrecipients. Included a description of OPTIS used for reporting purposes.
Section XIII Urbanized Area Formula Program (5307)	Section II Program Administration introduction 3.1 Method of Distribution of Funds	Most content in this section was largely removed as it is not a required element of the SMP and as PTD plays a small role in the administration of Section 5307 funding for Oregon small urban transit recipients. A description of the governor's apportionment process is included in the program overview in the introduction of Section II and in the description of funding distribution utilized by PTD in Section 3.1.
13.1 Program Goals		
13.2 Eligible Recipients and Subrecipients		
13.3 Eligible Assistance Categories		
13.4 Fund Distribution		
13.5 Federal and Local Match Funding Requirements		
13.6 Basic Grant Management Policies	4.2 Grants Management	Removed and instead refer to the basic grant management principles outlined for the capital, planning, and operating grants previously taken from other program areas such as 5310 and 5311.
13.7 Reporting Requirements	4.7 Reporting Requirements	No major changes

13.8 Title VI Program	5.1 Title VI and Limited English Proficiency	No major changes
13.9 Direct Recipient Coordination	4.8 Oversight	No major changes; Defer to FTA oversight for Section 5307 recipients.
Section XIV Special Transportation Fund Program	Removed	The STF program was rescinded by the Oregon State Legislature and rolled into the pre-existing STIF program. For the requirements regarding the STIF program, readers are referred to the STIF-STN Guidebook on ODOT's website.
Section XV Transportation Options Program	Removed	Removed as this is not a required element of the SMP. ODOT administers this program under new funding opportunities as funds become available or are allocated.
Section XVI Discretionary Grants Program	3.1 Method of Distribution of Funds 3.2 Project Selection Criteria	The content was incorporated into the description of the discretionary grant programs administered by PTD in their associated requirements. Any mention of the STF funding was removed.
16.1 Overview		
16.2 Project Selection Criteria and Method of Distributing Funds		
Abbreviations and Acronyms	Appendix A: Abbreviations and Acronyms	Information carried over with some minor updates to new acronyms or revised programs/divisions with new names