

ODOT Grant Management Training February 2025 Questions and Answers

National Environmental Policy Act (NEPA)

- 1. If a construction project is unintentionally initiated without properly completing the NEPA process, does that prevent you from using federal funding for that project or property in the future?**

The Federal Transit Administration's NEPA regulations prohibit project construction from proceeding until FTA has completed the environmental review process. Starting construction prior to completing the NEPA process, even unintentionally, is likely to render the project ineligible for FTA funding.

- 2. If a city purchased property two years ago, and now wants to use FTA funds for a project, is that possible?**

Whether a property that was purchased with local funds can be used for a future federally assisted project is highly dependent on the individual circumstances of when, how, and why a project sponsor acquired a specific property. FTA would need to individually review such "historical" acquisitions to determine if the intent of the acquisition was for a federally funded program or project. See FTA guidance (Q12 and Q13) for more information:

FTA Real Property Acquisition and the National Environmental Policy Act (NEPA) Frequently Asked Questions (FAQs) ask your RTC for the most recent links to these documents. Contact ODOT Environmental staff via your RTC to discuss the circumstances of specific projects or properties.

- 3. What has triggered this level of NEPA? We haven't had this before with things like vehicles. Also how long is it going to take to get our 5339s for rolling stock (the most recent one) reviewed? Are we looking at 6 to 10 months**

The requirements haven't changed, but FTA can change their approach to documentation and that is what has happened with the rolling stock. We anticipate Categorical Exclusions concurrence for rolling stock will take 2 to 3 weeks after ODOT's submittal of the concurrence request to FTA.

- 4. Is an endangered species analysis required for the environmental process when construction activities are planned? How long is the analysis good for?**

The type of analysis and documentation that FTA will need to comply with the Endangered Species Act (ESA) depends on whether a project is likely to adversely affect or jeopardize a federally listed species or its critical habitat. A project's effects on species or critical habitat

depend on the type and scope of proposed project activities, as well as the location of the project area and whether it includes any listed species and/or critical or suitable habitat.

- 5. What if you already have chargers in place that were purchased with local funds, can you then purchase vehicles with federal funds?**

It depends on the situation. Contact ODOT Environmental staff via your RTC to discuss the specific circumstances involved.

- 6. Can you explain what the process would be to purchase a replacement gas or diesel bus?**

Prior to purchasing rolling stock, the FTA must concur in writing that the purchase has been classified as a Categorical Exclusion. To provide FTA with the information they need to do that, subrecipients complete a Purchase of Rolling Stock Environmental Review Information form, which includes some simple prompts and fill-in spaces. ODOT provides completed Environmental Review Information forms to FTA. FTA reviews the information provided on the Environmental Review Information form and provides Categorical Exclusion concurrence, usually in 2 to 3 weeks after submittal by ODOT.

- 7. Is there a process or path to salvage a project's eligibility for Federal funds that may not have followed NEPA? We can use the example of improper segmentation.**

It depends on the situation. Contact ODOT Environmental staff via your RTC to discuss the specific circumstances involved.

- 8. If you bought a property and didn't follow NEPA, can you sell the property, complete the NEPA and then buy it back?**

ODOT Environmental staff posed this question to FTA who responded that this approach would be unlikely to work due to FTA's real estate purchase requirements.

Financial Management and Reporting

- 9. For STIF agreements, will the signed agreements be with each of the recipients or only the Qualified Entities?**

At this point, the Department of Justice has said it is just with the Qualified Entities.

- 10. Can the Qualified Entity require additional documentation over and above what is in the STIF Periodic Report, if the invoices provided match the amount in the SPR.**

The Qualified Entity can require additional documentation, but this may be under review in the future. Each Qualified Entity should check with your RTC and Programs Services before adding additional requirements.

- 11. The Agreed-Upon Procedure (AUP) is turned in when the audit report is transmitted, correct?**

Yes, it should be, or can be part of your audit report, but must contain the questions asked from the AUP form. [STIF-Agreed-Upon-Audit-Procedures-Form.pdf](#)

12. It's not a question, but for a small transit agency the biggest hurdle is Admin support.

Thank you for that additional information. We are hoping that we can provide some technical assistance with agencies with our Technical Resource Center resources. We are currently developing a scope for a technical assistance grant specifically supporting rural agencies. Be sure to communicate highest needs for rural agencies with your RTC.

13. Training on the Budget Detail Worksheet for PTSPs might be useful.

Thank you, that is great information. It would be great, and maybe we could do that during a quarterly meeting or tack that onto our financial management training that will take place this summer. There is a quarterly finance peer to peer meeting. Please reach out to RTC to get on the meeting invitation list. These meetings are optional and can be a resource for agencies.

What is considered when checking allowability of a reimbursable expense?

Cost must meet the following general criteria:

- Be necessary and reasonable for the performance of the Federal award and be allocable thereto under these principles.
- Conform to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items.
- Be consistent with policies and procedures that apply uniformly to both federally financed and other activities of the district.
- Be accorded consistent treatment.
- Be determined in accordance with generally accepted accounting principles.
- Not be included as a cost or used to meet cost sharing or matching requirements of any other federally financed program in either the current or a prior period.
- Be adequately documented.

Selected Items of Costs – is consistent with one of the allowability factors for selected items of costs articulated in 2 CFR § 200.420 through § 200.475.

Grant Budget – is consistent with the allowable expenses provided for in the grant agreement.

14. Certifying the Assets is very difficult as there are vehicles being sold, purchased and in the process.

Yes, the Agency Periodic Report is a snapshot in time and sometimes things do have to wait until the next quarter. The key is reporting as soon as you are able and have the most accurate information for the quarter.

**15. For accidents, do you report all accidents to ODOT or just ones that cross a certain threshold?
Do you need to report accidents just on ODOT funded vehicles or all vehicles?**

If you are part of the ODOT TAM plan you should report on any vehicles that have ODOT as security holder. You should also inform your RTC of the accident as you are not able to charge those against grants if part of the insurance deductible. Any accident that hits the threshold for crash reporting with DMV are required to be reported in your APR/SPR. Immediate notification—serious accident with fatalities or serious injury within 2 hours. Injuries requiring transport from the scene. Significant property damage \$2,500 or more.

As noted in our training one agencies driver didn't fill out an accident report as it was under the threshold, but the other party did report, and the driver of the public transit vehicle had their license suspended. ORS 811.720 has more on accident reports.

16. Can we get the definition of "incident"?

The term "incident" is often used when the exact details of an event aren't known, or when the event is considered less serious

The term "incident" can also be used to refer to a situation that could lead to an accident. Every accident can be an incident. However, not all incidents can be termed as an accident.

17. What is the difference between major and minor accidents?

The key is to look at the DMV threshold (\$2,500) for accidents and incidents. Best practice is to send the RTC an email even if small fender bender. ORS 811.720. We had a minor incident (\$1,000) even though technically did not have to submit a DMV report, because the other party submitted a report, DMV expected us to also submit one. This failure resulted in the agency's driver getting his license suspended. You might consider reporting it whether or not the accident exceeds the \$2,500 threshold.

18. What is considered in-kind? Where can I find more info or rules?

Third-party in-kind contributions means the value of non-cash contributions (i.e., property or services) that—(1) Benefit a federally-assisted project or program; and (2) Are contributed by non-Federal third parties, without charge, to a non-Federal entity under a federal award ([FTA Circular 9040.1H](#), pp. III-16, IX-4-6).

In-kind must be laid out in application initially. If it is not in the Statement of Work, it cannot be used for that grant funding. We will post the form that helps with tracking of the in-kind documentation on the training website.

FTA Funding

- 19. Regarding the 5311 applications and asking how much money we'd need each quarter, wasn't it only meant to be the amount we'd need within our published allocated amounts? We didn't note we'd need more than our allocation, even though we do.**

Correct. Agencies were asked to "Provide the expected reimbursement request amounts that are necessary to sustain existing service and/or avoid other significant hardships for Q3 2025, Q4 2025, Q1 2026 and Q2 2026." We were looking for statements of need in relation to agencies' allocation estimates. We realize there are additional unmet needs beyond what can be funded by the allocation estimates.

- 20. As we go into budget building, do we continue to assume that we will receive 100% of our formula dollars in 5310 and 5311 just delayed? Or do we need to curtail operational spending next fiscal year? And if so by how much?**

For the 2025-2027 biennium, Oregon's federal formula transit funding, set by Congress for federal fiscal years 2025 and 2026, totaled \$29.8 million for 5311 Formula Grants for Rural Areas and \$2.6 million in 5310 Enhanced Mobility for Seniors and Individuals with Disabilities. However, Congress has only funded federal fiscal year 2025, providing about \$14 million for 5311 and about \$1.2M for 5310 small urban formula funds. Additionally, Oregon will provide \$12.5 million for 5310 from Surface Transportation Block Grant (STBG) Program funding.

For the 2025-2027 biennium, ODOT will provide the first year of formula funding only, as approved by Congress, and not funds that have not been authorized yet. Federal fiscal year 2026 funding will be distributed once Congress passes a budget for 2026 and ODOT executes the grant agreements with FTA.

Miscellaneous Questions

- 21. Is there a template for Mobility Management reports?**

We do not have one, but we can begin working on a template to share with providers. The Regional Transit Coordinators will share the template once it is completed. For Mobility Management reports, please review your statement of work to ensure your reports provide these specific details and progress on each task and deliverable identified.

- 22. Is a fleet maintenance program report acceptable for invoices, or do you need all the actual invoices as well?**

A fleet maintenance program report is acceptable as long as your fleet report provides all the details as listed on our Preventive Maintenance log that is posted on the website:

[Preventative Maintenance Log.pdf](#). We need to see the following: invoice date, invoice

number, maintenance service provider, description of work performed, out of service dates, total maintenance cost, grant funding the charged expense.

23. For our APR, if we only have capital grants, do we need to submit the Budget Detail Worksheet? On the form itself, it looks like it does not apply to capital only projects.

If you have more than one grant it helps the RTCs to see a snapshot of all grants used during the quarter. We recommend working with your RTC to review what's possible to make the determination.

24. Do you have to go just by what the federal thresholds are (for procurement)?

No, you should go with the federal thresholds unless the state or local thresholds are more restrictive. Then you would use those figures. As a reminder, you also have to follow your own agency procurement policy not just the federal or state thresholds.

25. What if you are using local vendors for all the maintenance and don't have a contract?

It is fine to use local vendors, but you would need to conduct a procurement for any funding that is going out the door. The majority of folks would have spent above a micro purchase threshold and thus should conduct a procurement process. You must consider the total amount of funding you are spending over the entire biennium on services. It is possible you would need to complete an RFP or RFI process to develop a list of acceptable candidates and you should still be conducting a procurement process. It is best to reach out to your RTC and determine the best action forward.

26. Is the onsite review scheduled for a full day? We are working on blocking out calendars for our upcoming review.

Compliance review length varies depending on the agency, what is being reviewed and if you got your documents in ahead of the review. One way to help reduce the amount of on-site time would be to have all your requested documents turned in as soon as the request for information comes in. RLS being able to review documents ahead helps to target their areas of concern.

27. Is the procurement training that is coming up going to be more than just building a bus? There is so much more needed with all the recent changes.

The procurement training in May will be offered by RLS and will not talk specifically about building a bus. It will be going over federal regulations, requirements, thresholds and other important information. We have, however, been asked to provide additional training on buying a vehicle and will do so either with the procurement training or shortly after that training.

28. Is a Title VI Plan Required for STIF only recipients?

No. STIF is a state fund. Title VI Plan requirements are tied to federal funding.

If your agency receives STIF funding but does not receive any federal funds from ODOT, you are not required to have a Title VI Plan. Federal funding includes FTA, Federal Highway Administration, and other federal sources. Anytime your agency receives any funding from ODOT, federal or state, you should work with your ODOT contact in the relevant work area to determine necessary compliance or reporting requirements.

29. Can you post a good example of a Title VI Plan for a recipient to use as a template?

The best resource for updating a Title VI Plan in Oregon is our recently updated Intermodal [Title VI Transit Provider Handbook](#), which includes template language and examples in the appendix. It's difficult to share one example because many of the elements of the plan are specific to the transit services provided and geographic area served. Your RTC or ODOT's Office of Equity and Civil Rights can usually find a completed plan by another agency in Oregon with enough similarities to your agency to serve as an example.

30. If we are a subrecipient of a Tribe, can we use their plan?

Yes, it is possible to coordinate your plan with a Tribe or other entity that is passing through funds. However, the Title VI Plan will need to be written to include both agencies and there will be some elements that must be specific to your agency. The best solution is usually to create your own plan that can include many elements from the other agencies' plan, as they will be the same as your own. ODOT's Office of Equity and Civil Rights can help identify what elements can be the same and what will need to be unique.

31. Is the onsite review scheduled for a full day?

We are working on blocking out calendars for our upcoming review. Compliance review length varies depending on the agency, what is being reviewed and if you got your documents in ahead of the review. One way to help reduce the amount of on-site time would be to have all you requested documents turned in as soon as the request for information comes in. RLS being able to review documents ahead helps to target their areas of concern.

32. For the training held on Feb. 26, 2025, can you please share the link of the webpage (for resource documents and the presentation) you are referencing?

<https://www.oregon.gov/ODOT/RPTD/Pages/Training.aspx>

33. A training on rolling stock purchasing would be great including maybe how to also purchase off the state price agreement.

RLS will be conducting a procurement training in May, we will look at adding how to purchase off the state price agreement. [Buy a Vehicle: Public Transportation](#) webpage has resources to help with this process.

34. I am hoping the procurement training is more than just building a bus. There is so much more needed with all the recent changes.

The procurement training in May will be offered by RLS and will not talk specifically on building a bus. It will be going over federal regulations, requirements, thresholds and other important information. We have, however, been asked to provide additional training on buying a vehicle and will do so either with the procurement training or shortly after that training.

35. What are the dates for upcoming trainings?

Upcoming trainings will be posted on our website: [Public Transportation Provider Trainings](#).

- **Procurement Training** – Virtual training by RLS
May 14, 2025, 9:00 am – 12:00 pm
- **NEPA Environmental Training** - Virtual training by ODOT
May 21, 2025, 10:00 am - 11:30 am
- **Financial Management** – Virtual training by RLS
July 16, 2025, 9:00 am – 12:00 pm
- **Drug and Alcohol Training** – Two-day in-person training in Bend by RLS
July 29, 8:30 am – 5:00 pm
July 29, 9:00 am – 12:00 pm
- **STIF Periodic Reporting Training**
Summer 2025
- **Oregon Transportation Conference** – In-person in Bend with the final day including in depth trainings for STIF, federal funding and zero emissions vehicle transition planning that ODOT expects providers to attend.
November 2-5, 2025