

Oregon Community Paths Program GUIDELINES FOR 2025 GRANTEES (Federally Funded Projects)

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Disclaimer

These guidelines are intended as a general resource for Oregon Community Path (OCP) Federally Funded grant recipients—they should not be considered legal advice. They do not cover all details in the agreement or all circumstances, nor do they replace the project agreement between the grantee and the Oregon Department of Transportation (ODOT). The project agreement remains the binding legal document. The OCP program is governed by Oregon Revised Statutes 184.619 and Oregon Administrative Rules Chapter 731, Division 36. As statutory changes are possible for OCP funding cycles, this will be a living document as future changes are made.

Purpose

The Oregon Community Paths Program awarded 24 grants in 2025, some grants in a “construction” category and some grants in a “project refinement” category¹. These guidelines assist Oregon Community Path grant recipients in administering their awarded grants. While not all-inclusive, the guidelines touch on the most asked questions from grant recipients and should serve as a quick reference to ensure grant funds are spent according to the applicable policies and rules. Grantees are responsible for ensuring the terms in the project agreement are followed.

Overview

The OCP program provides grant funding for cities, counties, tribes, transit districts, certain non-profits and other local units of government through a reimbursement process for investments in off-road active transportation investments. The Oregon legislature allocated a percentage of the Automobile Privilege Tax and the bicycle excise tax to fund the program. In addition, the Oregon Transportation Commission authorized federal Transportation Alternatives funds allocated to the State to be used for the OCP.

OCP provided two types of grants in 2025, both federally funded: construction grants and project refinement grants. For both grants funded with federal funds, ODOT generally delivers the project unless the local grantee is [certified to deliver federally funded projects](#).

The Oregon Community Paths program does not provide additional funds for cost overages and does not guarantee future funding for project refinement grants. All costs that exceed the grant amount to deliver a project are the responsibility of the grant recipient.

Roles

Throughout your project, you will have regular and frequent contact with ODOT Community Paths Program Manager and support staff through the program email,

¹ For more information about the “Construction” and “Project Refinement” categories, please refer to the 2024 Grant Solicitation Guidelines listed in the Additional Resources section.

communitypaths@odot.oregon.gov and with ODOT staff in [your region](#). The project manager will be part of ODOT region staff and is your primary point of contact to address project questions.

In summary:

- **Grantee:** The OCP Grantee for a federally funded grant will primarily work with the assigned ODOT project manager and support the completion of the project on scope, schedule and on budget.
- **ODOT Project Manager:** Each OCP grant will be assigned an ODOT project manager from the grantee's region to manage the project from beginning (including agreement writing) through completion. For grantees certified to deliver federally funded projects, the ODOT project manager will take on more of a support role but still be involved in every aspect of the project. If the grantee is unclear who the ODOT project manager is, please contact CommunityPaths@odot.oregon.gov.
- **ODOT Oregon Community Paths Program Manager:** The OCP Program Manager's role is to discuss programmatic guidelines if the project has an issue that cannot be resolved by the grantee and the ODOT project manager. The OCP Program Manager can be reached using the program email address, CommunityPaths@odot.oregon.gov.
- **ODOT Certification Program Manager:** The Certification Program manager defines policies, processes, and requirements for certified delivery for local agencies that are certified to deliver federally funded projects.
- **ODOT Delivered Local Agency Program (ODLAP) Manager:** The ODLAP Manager defines policies, processes, and requirements for ODOT to deliver federally funded projects for local agencies. .

Federally Funded Grants

All federally funded Oregon Community Paths grants are financed through the Federal Highway Administration Surface Transportation Block Grant and administered by ODOT. Construction and project refinement projects must be completed by an agency [certified by ODOT](#) to administer federal funds. If the grantee is not certified, ODOT (or any other certified agency) can partner with the grantee to administer and deliver the project on their behalf. The grants and their use must comply with state and federal laws and regulations related to eligible construction and planning projects.

Statewide Transportation Improvement Program

When a project is federally funded, it must be included in Oregon's Statewide Transportation Improvement Program (STIP). This is a tracking and reporting program required to spend federal funds. To learn more please visit the STIP site, [Oregon Department of Transportation : STIP Documents : Statewide Transportation Improvement Program : State of Oregon](#).

Eligible Expenses for Federally Funded Grants

The ODOT project manager will be the primary contact for eligibility questions. If you are not sure who your ODOT project manager is, reach out to the OCP Program mailbox, CommunityPaths@odot.oregon.gov.

Generally, Oregon Community Paths funds are to be used for capital expenditures or planning expenditures. The OCP grant program has two categories, Construction grants and project refinement grants. Construction grants incorporate all aspects of a project including but not limited to design, utility relocation, right of way acquisition, and construction.

Project refinement grants may be determined based off the scope of the application to be either planning or preliminary engineering related work and will require clear explanation on the intent of the work to be done.

Eligible project costs generally include the actual costs expended to deliver the scope of work in the project agreement that are reasonable, necessary, and directly related to the project and project delivery and are considered capitalized to an asset that is part of the project. They generally do not include indirect, agency administrative costs, working capital, or operating costs.

Matching Funds

The Oregon Community Paths program requires that grantees provide a portion of their own moneys toward the project—we refer to this as “match,” “matching funds,” or “local cash match.”

Cash match is actual funds provided by the applicant that are reasonable, necessary, and directly related to the project and funded by the applicant. Examples of cash match include engineering, design, utility relocation, right of way acquisition, and construction costs.

Education and outreach efforts do not constitute cash match. Actual cash funds for federally funded projects will only be considered after the date the project agreements executed.

Federally funded grants must have a local cash match of 10.27%. Federal funds cannot be used as a cash match for a federal grant.

Project Agreement

When grantees accept Oregon Community Paths grant funds, they agree to adhere to applicable state and federal laws, regulations and rules and the additional requirements provided in a project agreement; grant monies must only be used for purposes consistent with these requirements. Improper use of funds may result in the state recovering grant funds.

The agreements for federally funded projects will be written by your ODOT region staff and facilitated by your ODOT project manager. Email CommunityPaths@odot.state.or.us if you do not know how to contact your ODOT Project manager. Agreements with certified agency grantees will be written on the certification program's current project agreement template.

All grantees should aim to begin spending funds within 2 years of having a signed project agreement and complete the project within ten years for construction grants and three years for project refinement grants. Extensions can be made due to complexities of federal funding.

Change Orders

To amend your agreement with ODOT, you must follow a process led by the ODOT project manager. This will entail requesting changes from your ODOT project manager (email CommunityPaths@odot.oregon.gov if you do not know how to contact your ODOT project manager) then follow the steps they lay out. This will likely include filling out a "Request for Change Order". The change will need to be approved by the ODOT project manager and the Oregon Community Paths manager, as well as other ODOT staff. Once the change is approved, the agreement will be amended.

Escalation Process

When a grantee is out of compliance with the terms of their agreement, it is critical to address each non-compliance event. The below is a general overview of steps if one is not detailed in your project agreement.

Step 1	Informal	ODOT staff attempts to work with grantee to achieve compliance (verbal and email)
Step 2	Informal	ODOT staff escalates to Oregon Community Paths program manager to determine whether the non-compliance merits escalation (verbal or email)
Step 3	Informal	ODOT staff sends email to grantee documenting the non-compliance concerns with a copy to CommunityPaths@odot.oregon.gov
Step 4	Formal	Oregon Community Paths program manager or other identified ODOT program manager sends letter documenting non-compliance concerns, provides options and deadline to remedy, and potential consequences with a copy to CommunityPaths@odot.oregon.gov
Step 5	Formal	Oregon Community Paths program manager or other identified ODOT program manager, sends decision letter with consequences with a copy to CommunityPaths@odot.oregon.gov

Reimbursements (if applicable)

If you are a certified agency delivering a federally funded grant, Oregon Community Paths is a reimbursement program; you may only request reimbursement after you have expended funds (paid bills) on eligible project activities. Reimbursement of both the certified agency's and ODOT's project costs will be in accordance with the funding and invoicing requirements of the Local Agency Certification Program and ODOT region reimbursement process.

For agencies that are certified to deliver federally funded projects, information about project invoicing is also available in the Progress Billing Chapter of the [ODOT Local Agency Guidelines for Certified Local Public Agencies](#).

Project Close-Out

For "Construction" projects, since the project is federally funded, it will need to pass an ODOT led inspection before it is considered complete. Before your project close-out, grantees must submit photos of the completed project to CommunityPaths@odot.oregon.gov For "Project Refinement" projects, grantee will submit a copy of the final contract deliverables to CommunityPaths@odot.oregon.gov.

For agencies that are certified to deliver federally funded projects, information about project close-out is also available in the Chapter 17 of the [ODOT Local Agency Guidelines for Certified Local Public Agencies](#).

Other Provisions

Records Retention

Grant recipients and their contractors must keep project and financial record for six years after project completion.

Americans with Disabilities Act (ADA)

Construction and project refinement projects are subject to the requirements of the Americans with Disabilities Act. Any work must be completed according to ODOT's standards. The ODOT project manager will lead the process and compliance.

Environmental Protection

Construction projects that are funded with federal dollars must follow [NEPA guidelines and processes](#). The ODOT project manager will lead the process and compliance.

High-level Summary: ODOT Region Procedures for Initiating a Federally Funded OCP Project

Step ²	Action
1	After Oregon Bicyclist Pedestrian Advisory Committee makes project recommendations to ODOT, the OCP program manager lets regional administrators know which projects to anticipate.
2	ODOT regional administrator assigns project manager.
3	OCP program manager connects project manager with new grantee.
4	OCP program manager provides project information to project manager.
5	OCP program manager provides project STIP information to STIP coordinator.
6	Project manager requests a project agreement through Oregon Buys and works with grantee to draft the needed specifics into the project agreement.
7	Grantee signs project agreement.
8	Once project agreement executed, project manager notifies Regional STIP coordinator, who requests federal authorization.
9	Regional STIP coordinator notifies project manager and OCP program manager of federal authorization.
10	Notice to Proceed for IGA agreement between ODOT and local agency.

Additional Resources

2025 Solicitation Guidelines: [2025 OCP Federal Solicitation Guide](#)

Guide to Federal Aid Programs and Projects: <https://www.fhwa.dot.gov/federalaid/projects.pdf>

Oregon Community Paths website: <https://www.oregon.gov/odot/Programs/Pages/OCP.aspx>
(Includes information about how to apply for future grants.)

Oregon Revised Statute 367.093: <https://www.oregonlaws.org/ors/367.093>

Oregon Administrative Rule Chapter 731, Division 36:

<https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=5681>

² These steps are not all inclusive and may change order depending on the timeline of the OCP call for applications.

ODOT Region Contacts for Local Governments:

<https://www.oregon.gov/odot/LocalGov/Pages/Contacts.aspx>

Guidelines for Local Agencies that are certified to deliver federally funded projects: [LAG Manual \(Full\)](#)