

ARP GRANT-MAKING TOOLKIT | FEDERAL TRANSIT ADMINISTRATION

Before compiling your TrAMS application, please review the language of the American Rescue Plan Act of 2021 (Pub. L. 117-2, March 11, 2021) and applicable Federal Transit Administration (FTA) Circulars (<https://www.transit.dot.gov/regulations-and-guidance/fta-circulars/final-circulars>; specifically, C9030.1E, C5010.1E, C9040.1G, and C9070.1G). You also may review resources available on FTA’s website (<https://www.transit.dot.gov/coronavirus>), which include COVID-19 FAQs, for additional guidance. In this document, the American Rescue Plan Act of 2021 will be referenced as “ARP.” You may see the acronyms “ARPA” or “ARP Act” in the Transit Award Management System (TrAMS) and elsewhere.

This grant-making toolkit is a general reminder of the items that FTA reviewers might look for in an application for ARP formula funding administered under Sections 5307, 5311, and 5310. This toolkit does not address the non-formula ARP programs (*i.e.*, Tribal Discretionary, Additional Assistance for Urbanized and Rural Areas, Competitive Planning under 5307, and Capital Investment Grant ARP). FTA may request additional information and documentation, depending on each application and its specific requirements. The contents of this document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies. Recipients and subrecipients should refer to FTA’s statutes, regulations, and Circulars for applicable requirements.

COMPARISON OF FORMULA FUNDING FEATURES – ARP vs. CARES & CRRSAA:

	ARP	CARES & CRRSAA
Federal Share	100%	up to 100%
Pre-Award Authority	All expenses must be incurred on or after January 20, 2020 .	
Eligible Expenses	Funds to be directed to payroll and operations of public transit (including that of private providers of public transportation) unless the recipient certifies to FTA that the recipient has not furloughed any employees since March 27, 2020.	To the maximum extent possible, funds to be directed to payroll and operations of public transit (including that of private providers of public transportation), unless the recipient certifies to FTA that: <ul style="list-style-type: none"> • The recipient has not furloughed any employees since March 27, 2020; or • The recipient has brought back furloughed employees/rehired laid off positions.
Intercity Bus	States are required to set aside 15% of their Section 5311 apportionment for intercity bus activities unless they certify, after consultation, that intercity bus needs in the state have been met.	CARES: States are required to set aside 15% of their Section 5311 apportionment for intercity bus activities unless they certify, after consultation, that intercity bus needs in the state have been met. CRRSAA: 15% set aside not required, but intercity bus is an eligible expense.
Private Provider Eligibility	Private providers of public transportation are not eligible subrecipients under 5307 ARP but may receive funding through contractual agreements. Providers normally eligible under 49 U.S.C. § 5310 and 49 U.S.C. § 5311 remain eligible under Section 5310 and Section 5311 ARP.	Private providers of public transportation are eligible to become subrecipients of funding.
Period of Availability	Available for obligation until September 30, 2024 (October 1, 2024 lapse date).	Available until expended. No lapse date.
Drawdown Deadline	Available for disbursement until September 30, 2029 .	Available until expended. No drawdown deadline.
TIP/STIP	Projects are required to be in the TIP or STIP <i>only if</i> they are capital projects that involve substantial changes to the function, location, or capacity of the asset(s) involved.	
DOL Certification	Relevant 5307/5311 DOL requirements apply.	

GENERAL NOTES:

- For more information regarding the differences between ARP, the Coronavirus Aid, Relief, and Economic Security (CARES) Act, and the Coronavirus Response and Relief Supplemental Appropriations Act, 2021 (CRRSAA), please see FTA's [COVID-19 FAQs](#) and the [ARP webpage](#).
- The Emergency Relief Docket (FTA-2021-0001 at <https://www.regulations.gov/docket?D=FTA-2021-0001>) is open and available for requests for relief from FTA statutory and administrative requirements of Sections 5307 and 5311 funding in States that have declared an emergency or the President has declared a disaster. Grant recipients should discuss the need for a waiver with the FTA regional office prior to submitting a request to the Docket. Any waiver requests or approvals from FTA requirements should be referenced in the grant application.
- Recipients should apply for ARP funds through a stand-alone TrAMS application, separate from CARES Act, CRRSAA, general formula funds, and other non-ARP funding sources.
- ARP funds shall be directed to payroll and operations of public transit (including that of private providers of public transportation), unless the recipient certifies to FTA that neither they nor their subrecipients and contractors that are providers of public transportation have furloughed any employees within the agency under their current Certifications and Assurances (in TrAMS) *and* in the application executive summary (see [FAQ CA50](#)). If a recipient of ARP funding has furloughed employees on or after March 27, 2020, it cannot use ARP funding for any expenses other than operations and payroll, even if furloughed positions have since been brought back. Recipients are responsible for ensuring that payments of ARP funds to subrecipients are consistent with this requirement and that the current Certifications and Assurances are accurately certified.
- FTA will reimburse any actual, eligible expenses incurred on or after January 20, 2020 (the date on which the public health emergency was declared), including eligible expenses that may have otherwise been offset by lost revenue. This includes all expenses normally eligible under Urbanized Area Formula Grants (Section 5307), the Formula Grants for Rural Areas Program (Section 5311), or the Enhanced Mobility for Seniors and Individuals with Disabilities Program (Section 5310) that occurred on or after January 20, 2020, at a 100% Federal share.
- All net operating expenses (after subtracting fare revenues from the eligible operating expenses) incurred on or after January 20, 2020 are eligible under Section 5307, Section 5311, and Section 5310, for all recipients in large urban, small urban, and rural areas, including the following:
 - Provision of transit service, which may include, but is not limited to:
 - Drivers and other operations worker salaries;
 - Fuel; and
 - Items having a useful life of less than one year, including personal protective equipment and cleaning supplies.
 - Administrative leave for operations employees (including employees performing maintenance). Administrative leave is an administratively authorized absence from duty without loss of pay or reduction in an employee's available leave. In the context of the COVID-19 public health emergency, administrative leave could include, but is not limited to:
 - Leave for an employee who is not required to work due to a reduction in service;

- Leave for a worker who is quarantined after potential exposure to an individual infected with COVID-19; and
- Leave for an employee to receive the vaccine, including reasonable time for the employee to recover from potential side effects.
- Existing operations and maintenance service contracts awarded prior to January 20, 2020, whether previously funded by Federal or non-Federal funds.

NOTE: Services provided through operations and maintenance contracts awarded prior to January 20, 2020 that did not follow Federal procurement requirements are eligible for reimbursement.
- Operating costs of [essential services](#), including meal delivery, until January 20, 2022.
- Preventive maintenance, including cleaning of vehicles and facilities (considered an operating expense for the purposes of CARES Act, CRRSAA, and ARP reimbursement).
- Consistent with regular formula grant reporting requirements, Quarterly Federal Financial Reports (FFR) and Milestone Progress Reports (MPR) are required for all ARP applications with any of the following criteria:
 - Grant total is in excess of \$2 million,
 - Includes Construction Activities,
 - Any other risk factor identified with the grantee or grant activities that may trigger quarterly reporting.
- The period of availability for ARP funding ends on September 30, 2024 (lapse date of October 1, 2024).
- ARP funding must be fully disbursed from the grant application by September 30, 2029. Any undisbursed funds after this date will be deobligated and returned to the Treasury.
- After reviewing FTA's [COVID-19 FAQs](#), please direct outstanding ARP inquiries to your [Regional Office](#).

RECIPIENT INFORMATION

CERTIFICATIONS AND ASSURANCES: Prior to award, each recipient must have the FFY 2021 Certifications and Assurances pinned in TrAMS. If the Approving Official and Attorney were not the users to pin in TrAMS, please ensure the appropriate documentation is attached (*e.g.*, Delegation of Authority, Signature Page). If an ARP application in TrAMS includes expenditures that are not directly related to payroll and operations of public transit, FTA will review the recipient's Certifications and Assurances to ensure that the recipient has certified to FTA that no employees have been furloughed. Any questions regarding this requirement not sufficiently answered by FTA's [COVID-19 FAQs](#) should be directed to your FTA Regional Office.

The FFY 2021 Certifications and Assurances and a summary of changes made between FFY 2020 and FFY 2021 have been posted on FTA's website. See: <https://www.transit.dot.gov/funding/grantee-resources/certifications-and-assurances/certifications-assurances>.

CIVIL RIGHTS: Each recipient must adhere to civil rights laws in all areas, including the Americans with Disabilities Act (ADA), Equal Employment Opportunity, Disadvantaged Business Enterprise, and Title VI of the Civil Rights Act. ARP applications that include projects with new construction, construction that involves alterations of stations or stops, or that involve rebuilding or retrofitting vehicles must meet the U.S. Department of Transportation's Standards of ADA compliance. See: <https://www.transit.dot.gov/regulations-and->

[guidance/civil-rights-ada/civil-rightsada.](#)

SYSTEM FOR AWARD MANAGEMENT (SAM) REQUIREMENTS: Each applicant or recipient must have an active (*i.e.*, not expired or otherwise restricted) SAM registration to apply for awards. See: <https://sam.gov/SAM/>.

SUPPORTING DOCUMENTATION: Attach all relevant supporting documentation in the Application Documents section. Supporting Documentation may include, but is not limited to, split or suballocation letters, requests and/or approvals of FTA waivers and Program Circular Operating Expense Worksheets used to determine the amount of eligible operating assistance (*e.g.*, Appendix C of C9030.1E for 5307, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FINAL_FTA_circular9030.1E.pdf). Depending on the specific activities included in the grant application, additional documentation may be requested at FTA's discretion.

APPLICATION DETAILS

APPLICATION NAME: The Application Name should specifically include reference to ARP, the applicable program (*i.e.*, 5307, 5311, 5311(c), 5311(f), or 5310), the Agency Name, and a title that accurately reflects the project scope.

Example: *ARP Section 53XX ABC Transit Operating Assistance*

APPLICATION TYPE: Select "Grant."

APPLICATION EXECUTIVE SUMMARY: Include FFY 2021 Section 53XX ARP funding, the UZA(s) from which funds have been allocated, amount of federal funds being requested, indicating whether for the full apportionment or partial, a brief application description, types of project(s) included, and list of subrecipients, if applicable.

First paragraph template:

This is an FFY 2021 Section 53XX ARP funding application (ABC UZA) in the amount of \$XXXX, representing 100% federal share of the total eligible amount. This application utilizes ARP funding to prevent, prepare for, and respond to coronavirus. The application scope of work includes [provide a list of projects and/or subrecipients included in the application].

The Application Executive Summary should also include:

- Total federal funds apportioned or suballocated to the recipient, as well as a breakdown by urbanized area (UZA), as applicable:

The split/suballocation letter(s), dated xx/xx/xx21, is attached in TrAMS.

- Acknowledgement of balance of ARP funding and recipient plan for remaining funding (if applicable):

The remaining balance of \$XXX, XXX will be requested in a future grant application or amendment.

- Detail on each of the following five elements:
 - Purpose of the award;
 - Activities to be performed;
 - Expected outcomes;
 - Intended beneficiaries; and
 - Subrecipient activities.

- If the application includes line items that are not directed to payroll and operations of public transit (including that of private providers of public transit), the Recipient must include the following statement to reflect the requirement in Section 1.5 of the FFY 2021 Certifications and Assurances:

The Recipient certifies that it, and its subrecipients and contractors that are providers of public transportation, have not furloughed any employees since March 27, 2020 (the enactment date of the CARES Act).

NOTE: Per [FAQ CA50](#), the annual Certifications and Assurances alone are not sufficient to confirm that the Recipient has not furloughed employees under ARP. If using ARP funding for activities outside of payroll and operations of public transit, the language above is mandatory.

- Required for all ARP applications, a certification that:

The Recipient agrees that if it receives Federal funding from the Federal Emergency Management Agency (FEMA) or through a pass-through entity through the Robert T. Stafford Disaster Relief and Emergency Assistance Act, a different Federal agency, or insurance proceeds for any portion of a project activity approved for FTA funding under this Grant Agreement, it will provide written notification to FTA, and reimburse FTA for any Federal share that duplicates funding provided by FEMA, another Federal agency, or an insurance company.

- A statement highlighting whether any projects in the application lead to a functional, location, or capacity change. If not, include:

Per ARP, the project(s) in this application is/are not required to be programmed in the Long-Range Transportation Plan, Statewide Transportation Plan, or Statewide Transportation Improvement Program.

If a project does involve a functional, location, or capacity change, include:

This project(s) is listed in the current Statewide Transportation Improvement Program (STIP). The STIP ID is XXXX (if applicable). This project is referenced in the STIP on page XX, and the reference page is attached in Application Documents.

- In each UZA to which funds are apportioned under Section 5307, designated recipients and recipients must certify that either: (1) recipients in the urbanized area will collectively expend at least 1 percent of the amount apportioned to the UZA for a fiscal year on “public transportation security projects,” or (2) that such expenditures for security projects are unnecessary. If a recipient certifies that such expenditures are unnecessary, the recipient should include a brief explanation of how this was determined in their grant application. If such expenditures are not necessary, please include a brief description of how this was determined

Please reference the Activity Line Item(s) (ALIs) associated with this requirement.

- If using 3rd party contractors, please add the following:

“[Recipient name] will follow all 3rd party procurement policies as defined in C4220.1F (Third Party Contracting Guidance).”

“[Recipient name] will ensure contractors procured will not be on the FTA Suspension and Debarment list.

- If applicable, the Executive Summary should identify subrecipients funded through the grant application and the projects being implemented by each subrecipient.
- If applicable, please add the following statement for operating expenses:

The operating expenses requested in this application were determined by [Agency to provide explanation of how they arrived at the amounts requested and separate into three categories, if necessary]. The [Agency Name] understands that the expenses requested in this application are subject to review for their reasonableness as part of the agency’s next Triennial/State Management Review.”

PERIOD OF PERFORMANCE START DATE: Date grant is awarded (automatically populated at FTA Obligation/Award).

PERIOD OF PERFORMANCE END DATE: Select date by which all activities are expected to be complete and no further costs incurred. The Period of Performance End Date should be set to the next March 30th, a minimum of two years beyond the latest milestone. For example, if the latest milestone is 12/20/22, the Period of Performance End Date would be 3/30/25. Please note however there is one exception, the Period of Performance End Date should not fall after September 30, 2029. Funding must be **fully** disbursed from the grant application prior to that date.

NOTES: If all activities were completed prior to the Award Start Date due to pre-award authority, the recipient should enter an Award End Date at least ninety days after the Award Start Date to provide time for disbursement of funds.

PRE-AWARD AUTHORITY: The Pre-Award Authority start date for ARP funding is January 20, 2020.

NOTE: If Pre-Award Authority is selected, the recipient will be required to prepare an initial Federal Financial Report (FFR) in TrAMS before grant execution. Expenses incurred should be recorded on the initial FFR. If no expenses have been incurred, then a statement in the initial FFR should reflect why pre-award authority was chosen. If the agency entered a contract prior to grant execution, the unliquidated obligations line in the initial FFR should reflect the contract amount.

INDIRECT COST RATE: All recipients must identify whether:

- Indirect costs will be applied to this application at the organization’s approved rate.
- The de minimis indirect cost rate of 10% will be applied to this application.

or,

- Indirect costs will not be applied to this application.

If your organization’s approved Indirect Cost rate will be applied, include the rate information and ensure that either Cost Allocation Plan or Indirect Cost Rate Proposal approval documentation by the respective Cognizant Federal Agency is uploaded in TrAMS in the organization’s Recipient Profile. If applying the de minimis rate, please ensure the certification form has been uploaded in TrAMS (please refer to FTA Circular 5010.1E, page VI-9, for more details).

NOTE: Indirect costs may be included in accordance with the requirements outlined in the approved indirect cost documentation, including established rates, timeframes, and applicable items of cost. When selecting “Yes” to indirect costs, applicants must add details about the rate(s) to the Indirect Cost Description section of

the application details. Please consult the FTA [Regional Office](#) for additional guidance.

PROJECT DETAILS AND NARRATIVES

PROJECT NAME: Each project (or expense) must include a name that identifies the eligible expenses being undertaken within the project.

PROJECT DESCRIPTION: Information in this section should allow reviewers to obtain a general understanding of the nature, purpose, and eligibility of the activities and expenses included within each project in the application.

If applicable, the project or expense description should identify subrecipients funded through the grant application and the projects being implemented by each subrecipient.

NOTE: Under ARP, private providers of public transportation are not eligible subrecipients.

Sufficient detail includes, but is not limited to:

Funding Type. State the type of funds requested [5307/5311/5311(c)/5311(f)/5310]. Include total project cost and the amount of federal funding being requested in the specific Project. Indicate whether future grant requests will be made for remaining project costs.

Also, include: *The Federal share is 100%.*

*X% (up to 10%) of the ARP allocation will be used for state/program administration.
(For Section 5311/5310)*

Project Scope. Describe the scope of work, components, and quantity of capital items funded under this project, as well as a justification for the grant request.

Program of Projects. For Section 5307 ARP funds, operating assistance projects and capital projects that do not involve a substantial change to the function, location, or capacity of an asset, are subject only to the requirements associated with making the amount of funding available to the recipient (49 U.S.C. § 5307(b)(1)) and making the final program of projects available to the public (49 U.S.C. § 5307(b)(7)). Projects funded with Section 5307 ARP funds that involve substantial changes to the function, location, or capacity of transit system assets are subject to all Program of Projects requirements.

For Section 5311 and Section 5310 ARP funds, a State or designated recipient may develop a program of projects consistent with its documented State Management Plan or Program Management Plan that has been updated to accommodate ARP funds.

Please work with your [Regional Office](#) should you have questions about Program of Projects requirements under ARP.

Coordinated Plan. For 5310 ARP applications, include a statement confirming that all projects are consistent with a Coordinated Human Services Transportation Plan.

Intercity Bus. States are required to set aside 15% of their formula Section 5311 ARP apportionment for intercity bus activities unless they certify, after consultation, that intercity bus needs in the state have been met. Certification letter from the Governor must be attached, if applicable.

If a State is a recipient of 5311(f) Intercity Bus funding under ARP, the full allocation must be dedicated to intercity bus service unless certification that intercity bus needs in the state have been met is in place. If all intercity bus needs have been met, 5311(f) funding may be used for any activity eligible under the

formula 5311 ARP program.

PROJECT BENEFITS: Each project must include a statement of the intended outcomes of the project and who will benefit from the project.

CAPITAL INVESTMENT PROJECT DETAILS: Select “No, this is not a Capital Investment Grant project.”

PROGRAM PLAN INFORMATION: Please review the programming requirements under ARP that may apply to your project.

Under **STIP/TIP**, include one of the following statements in the description box. Note that, per ARP, STIP/TIP is required *only* for capital projects leading to a substantial functional, location, or capacity change.

This project(s) includes only operations, planning and/or capital projects, with no substantial functional, location, or capacity change. Therefore, per ARP requirements, no Statewide Transportation Improvement Program (STIP) or Transportation Improvement Plan (TIP) documentation is needed.

or

This project(s) is listed in the current Statewide Transportation Improvement Program (STIP). The STIP ID is XXXX (if applicable). This project is referenced in the STIP on page XX, and the reference page is attached in Application Documents.

PROJECT LOCATION: Recipients should identify the Urbanized Area(s) and congressional district(s) in which the project is located, along with a brief narrative on the project’s location.

BUDGET ACTIVITY LINE ITEMS & MILESTONES

FTA FUNDING INFORMATION: ARP funds have been apportioned under Section 5307, Section 5311, and Section 5310. When building the application budget, please select the appropriate FTA Funding Source for your agency:

- 5307 Urbanized Area Formula Grants (ARPA);
- 5311 Rural Area Formula (ARPA);
- 5311 Tribal Transit Program Formula (ARPA);
- 5311 Rural Transit Assistance Program (ARPA);
- 5311(f) Inter City Bus (ARPA); or
- 5310 Mobility of Sr. and Indv. w/ Disabilities Formula (ARPA).

Please select the FTA Funding Source in TrAMS carefully. The correct formula ARP programs will appear exactly as they do above. Any remaining ARPA sources (e.g., 5307 – Urbanized Area Additional Assistance (ARPA), 5311 – Rural Area Additional Assistance) are not the correct selections for the formula ARP funding programs addressed in this toolkit.

5311(f) Intercity Bus (ARPA). When applying for funding under the 5311(f) Intercity Bus ARP program, select the appropriate funding source in TrAMS [5311(f) – Inter City Bus (ARPA)], which is different from the 5311 - Rural Area Formula (ARPA) funding source.

5311 Rural Transit Assistance Program (ARPA). When applying for funding under the 5311 Rural Transit Assistance ARP program, select the appropriate funding source in TrAMS [Rural Transit Assistance Program (ARPA)], which is different from the 5311 - Rural Area Formula (ARPA) funding source.

ACCOUNT CLASSIFICATION CODES (ACC)

Short Code	Program	Account Class Code	Fiscal Year	Appropriation Code	Section Code	Limitation Code
5307-9	Urbanized Area (ARPA)	2021.32.90.PV.1	2021	32	90	PV
5311-10	Rural Area (ARPA)	2021.32.18.PR.1	2021	32	18	PR
5311-10A	RTAP (ARPA)	2021.32.18.P6.1	2021	32	18	P6
5311-10D	5311(f) – Intercity Bus (ARPA)	2021.32.18.PI.1	2021	32	18	PI
5311-10C	Tribal (ARPA)	2021.32.18.PF.1	2021	32	18	PF
5310-5	Mobility States (ARPA)	2021.32.16.PS.1	2021	32	16	PS
	Mobility 50-200K (ARPA)	2021.32.16.PM.1	2021	32	16	PM
	Mobility >200K (ARPA)	2021.32.16.PL.1	2021	32	16	PL

LINE ITEMS: Appropriate scopes and ALIs should be selected when developing the project budget. Please utilize the “Custom Line Name” feature to denote specific use of funds, as appropriate.

5307 Urbanized Area Formula Grants (ARPA). Following selection of the ARP Account Classification Code (ACC), the Operating Assistance Scope Code for operational expenses under the 5307 ARP program is **300-00**. Activity Line Item (ALI) code for 5307 ARP operational expenses at 100% is **30.09.08** with a pre-set 100% share. For Preventive maintenance, use Scope Code **117-00** with the ALI of **11.7A.00**. For ADA paratransit, use Scope Code **117-00** with the **ALI of 11.7C.00**. Other ALIs also are available.

5311 Rural Area Formula (ARPA). Following selection of the ARP ACC, the Operating Assistance Scope Code for operational expenses under the 5311 ARP program can be either 300-00 or 600-00. The recommended Scope Code is **600-00** with the ALI of **30.09.08** with a pre-set 100% share. However, recipients that traditionally use other Scope and ALI coding may use those. For Program Administration, use Scope Code **610-00** with the ALI of **11.80.00**. For Intercity Bus, use Scope **634-00** with the ALI of **30.09.08**.

5310 Enhanced Mobility of Seniors & Individuals with Disabilities (ARPA). Following selection of the ARP ACC, please use Scope Code **641-00**. ALI code for 5310 ARP operational expenses at 100% is **30.09.08** with a pre-set 100% share. For Program Administration, use Scope Code **610-00** with the ALI of **11.80.00**.

NOTE: Under ARP 5310, recipients are not required to dedicate a minimum 55% of the apportionment to traditional capital projects.

EXTENDED BUDGET DESCRIPTION (EBD): Sufficiently detailed EBDs should be provided for each ALI and include the more activity-specific information that may not have been mentioned at the Project level.

Sufficient detail may include, but is not limited to:

Contract Information. Please note the selection process used for each procurement (*e.g.*, sole source). If your agency has requested a waiver on the Emergency Relief Docket, please note here.

Useful Life. Please include useful life information for all rolling stock ALIs and capital equipment valued

over \$5,000 in the EBD of the applicable ALI. Refer to C 5010.1E for common useful life standards and sources where useful life information of less common assets may be found.

For vehicle replacement, include a list of vehicles being replaced with vehicle identification number (VIN), year, make, model, and mileage (or reference the attached document where information is listed). Include a statement that replacement vehicles have met useful life.

For State Department of Transportation recipients: If the State has a different useful life from FTA in their State Management Plan (SMP), please note in EBD.

Project Management, Force Account, Fleet Management, Transit Asset Management, and Safety Plans.

Indicate the status of these documents, if required. Force account work under \$1,000,000 may be performed with no additional documentation. Force account work between \$1,000,000 and \$10,000,000 requires justification. Force account work over \$10,000,000 requires a Force Account Plan approved by FTA.

Common project activities funded by ARP may include operating and the provision of service, preventive maintenance, project administration, and state administration. Preventive maintenance may be categorized as an operating expense for CARES Act, CRRSAA, and ARP grants. Suggested EBD language for these activities is provided below.

For **Operations** activities:

Operating funds will cover expenses for existing service incurred beginning XX/XX/20XX until XX/XX/20XX, including [provide brief description of costs].

or

Operating funds will cover expenses for new or expanded service incurred beginning XX/XX/20XX until XX/XX/20XX, including [provide brief description of costs]

NOTES: Recipients may use the worksheet in Circular 9030.1E to determine the amount of eligible operating assistance, if needed. If worksheet is used, please attach. Generally, the eligible amount of operating assistance is *operating costs minus fare box revenues*.

If applying for multiple years of operating assistance, please separate each year/12-month increment into separate ALIs.

For **Preventive Maintenance** activities:

These funds will support [bus or rail] preventive maintenance activities as defined in the National Transit Database from XX/XX/20XX until XX/XX/20XX. Expenses include [provide brief description of costs].

Be sure to list preventive maintenance items valued over \$5,000 and their useful life.

When there are no items over \$5,000:

"The agency [Name] does not anticipate the purchase of items over \$5,000 in value at this time. Any items with value over \$5,000 identified during the execution of the activities under this ALI will be included after award (actual value and useful life)."

If applying for multiple years of preventive maintenance, please separate each year/12 month increment into separate ALIs.

For **Project Administration** expenses under ARP Section 5307:

These funds will be used to support administrative activities pertaining to the immediate accomplishment or oversight of capital activities outlined within this grant.

For **State Administration** expenses:

These funds will be used to support administration of ARP 5311 funding. This ALI does not exceed the maximum of 10% of the state's ARP apportionment.

For **Program Administration** expenses:

These funds will be used to support administration of ARP 5310 funding. This ALI does not exceed the maximum of 10% of the ARP apportionment.

NOTE: If the time period listed for Operating Assistance, Preventive Maintenance, or Project/State/Program Administration overlaps with a corresponding time period in another application (CRRSAA, CARES Act or other FTA funding), please list the applicable FAIN(s) and add a statement explaining that the other available funding is insufficient to cover eligible expenses within the period.

For other project activities, please consult with the [Regional Office](#), as appropriate.

Please ensure that the quantity of capital purchases is included in the budget in the quantity field and confirm that this number matches the language in extended budget description.

MILESTONES: Each milestone will be populated with a generic start date/end date field, and recipients are required to identify, at minimum, a start date and an end date for each ALI. However, recipients should add additional milestones, as appropriate, to allow for efficient oversight.

- ALIs that do not include contracted out project activities should, at a minimum, include: (1) Activity Start Date and (2) the Activity Completion Date.
- At a minimum, activities that will require a contract award should have milestones identifying the (1) Request for Proposal (RFP)/Invitation for Bids (IFB Issuance Date, (2) Contract Award Date, and (3) Contract Completion Date.
- Rolling stock ALIs should list five milestones: (1) RFP/IFB Issue Date, (2) Contract Award Date, (3) Initial Delivery Date, (4) Final Delivery Date, and (5) Contract Completion Date.

Milestone dates prior to the Period of Performance Start Date may be entered if the recipient has used pre-award authority.

NOTES: For ARP funding, pre-award authority cannot be applied before January 20, 2020.

For State vehicle contracts, please ensure that the vehicle order was not submitted prior to January 20, 2020.

The Period of Performance End Date on the Application Details screen must occur after the final milestone date in the application.

ENVIRONMENTAL DETERMINATIONS

All National Environmental Policy Act (NEPA) and related environmental requirements apply under ARP.

- Operating, planning, and administrative activities will typically fall under Class II(c) – Categorical Exclusion (C-List), Type 04.
- Capital activities, including preventive maintenance, for COVID-19 response typically will fall under Class II(c) – Categorical Exclusion (C-List), Type 07 (vehicles and equipment), or Type 08 (facilities).

Please note that even though a “C-List” categorical exclusion (CE) option (23 CFR § 771.118(c)) may apply to a project, additional requirements applicable to other Federal and State statutes and regulations may still apply, including but not limited to Section 106 of the National Historic Preservation Act, Section 4(f) of the 1966 Department of Transportation Act, the Clean Water Act, the Clean Air Act, the General Bridge Act, and the Endangered Species Act. Some of these requirements may require review and/or permitting by other Federal agencies. Actions requiring consultation or permitting by another federal agency could constitute unusual circumstances and potentially trigger a higher level of NEPA review, requiring the development of an Environmental Assessment or an Environmental Impact Statement. Requirements under other environmental laws and permits must be met before the project proceeds, regardless of the availability of the NEPA C-List CE. If your project may require additional review or permitting, please consult with your FTA regional planning contact or Environmental Protection Specialist immediately.