

Coordinating Council on Access and Mobility

Report to the President



In response to: Fixing America's Surface Transportation Act Section 3006(c)(4)

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E.0 Executive Summary

E.1 CCAM Background

Transportation provides access to essential human services that enhance the health, happiness, and productivity of Americans. Human service transportation fosters personal mobility by connecting people to their homes, jobs, education, medical appointments, and communities. Millions of Americans, however, are unable to access reliable transportation services due to a lack of mobility. People with disabilities, older adults, and individuals of low income are disproportionately affected by gaps in transportation services, disconnecting them from their communities.

To improve these targeted populations' access to transportation—and thus to employment, medical appointments, and more—President George W. Bush signed in 2004 Executive Order 13330: Human Service Transportation Coordination, establishing the Interagency Transportation Coordinating Council on Access and Mobility (“Coordinating Council on Access and Mobility,” “CCAM,” or “Council”). The CCAM was charged with improving coordination across federally funded transportation services for people with disabilities, older adults, and individuals of low income with the goal of increasing access and efficiency of transportation for these targeted populations. To accomplish coordination, the CCAM issues policy recommendations and implements activities that increase the efficiency, accessibility, and availability of Federal programs that fund transportation services.

The Secretary of Transportation chairs the Council and ten additional agency leaders form the CCAM's membership. Nine of the 11 total CCAM agencies—the Departments of Agriculture (USDA), Education (ED), Health and Human Services (HHS), Housing and Urban Affairs (HUD), Interior (DOI), Justice (DOJ), Labor (DOL), Transportation (DOT), and Veterans Affairs (VA)—currently fund grant programs that can fund human service transportation. The additional two CCAM agencies—the National Council on Disability (NCD) and the Social Security Administration (SSA)—provide valuable expertise to enhance the CCAM's ability to serve its targeted populations.¹

E.2 FAST Act Requirements

Section 3006(c) of the Fixing America's Surface Transportation (FAST) Act (Pub. L. 114-94) specifically requires the CCAM to improve Federal coordination of transportation services for people with disabilities, older adults, and individuals of low income. **Figure 1** notes the two FAST Act requirements of the CCAM.

Figure 1: CCAM FAST Act Requirements

FAST Act Requirements
Publish a strategic plan
Submit a report to the President

¹ CCAM agencies are listed throughout this report in alphabetical order.

E.3 Key CCAM Activities Under the FAST Act

CCAM agencies have worked closely together to meet the statutory requirements imposed under the FAST Act. As the Secretary of Transportation is the chair of the CCAM, the Department of Transportation (DOT) has stewarded the CCAM's activities on behalf of the Council. The Council completed ten main activities to create Federal transportation resources and coordinate CCAM agencies to address FAST Act requirements:

1. Distributed **Pilot Program** grants;
2. Developed a new **CCAM Strategic Plan**;
3. Convened three **Federal Work Groups**;
4. Facilitated **CCAM State and Local Focus Groups**;
5. Analyzed the **National Center for Mobility Management (NCMM) Survey** results;
6. Convened the **Program Analysis Working Sessions** and published the **Federal Fund Braiding Guide**;
7. Developed the **CCAM Program Inventory**;
8. Gathered CCAM agencies for an official **CCAM meeting**;
9. Developed the **CCAM Cost-Sharing Policy Statement**; and
10. Submitted this **Report to the President**.

The successful execution of these activities relied heavily on interagency coordination led by DOT. Staff across CCAM agencies participated in work groups and contributed their expertise to aid the CCAM's development of these products. CCAM agency leadership convened in October 2019 for the first official CCAM meeting since 2008, during which the CCAM Strategic Plan 2019–2022 was adopted.

E.4 Challenges to Improving Transportation Coordination

One focus area of the CCAM was to identify **barriers to State and local transportation coordination** as required by the FAST Act. These barriers make it difficult to reduce duplication, fragmentation, and overlap of transportation services.

To address these barriers, the CCAM has identified 12 challenges that fall into two categories:

1. Challenges related to **CCAM agencies' engagement in the Council**; and
2. Challenges related to **State and local barriers to transportation coordination**.

The challenge categories are further divided into two subcategories: **global** challenges that broadly pertain to transportation coordination and challenges that, if addressed, would enhance **NEMT** coordination. Each challenge is directly associated with goals and objectives outlined in the CCAM Strategic Plan, **Mobility for All**. These challenges are listed in **Figure 2**.

Figure 2: Challenges Identified by the CCAM

Category	Challenges
CCAM Engagement: Global	<p><i>Challenge 1: Further Improving Coordination Amongst CCAM Partners</i></p> <p><i>Challenge 2: Improving Technical Assistance Delivery</i></p> <p><i>Challenge 3: Identifying Progress in Coordination</i></p>
State and Local Barrier: Global	<p><i>Challenge 4: Participation in Local Coordinated Transportation Planning Is Not Always Incentivized</i></p> <p><i>Challenge 5: Vehicle Sharing Is Not Expressly Allowed</i></p> <p><i>Challenge 6: Need for Transportation Data Collection Guidance</i></p> <p><i>Challenge 7: Recipients Are Not Enabled to Braid Federal Funds, Even When Not Expressly Prohibited</i></p> <p><i>Challenge 8: Reporting Requirements for Jointly Funded Projects Are Complicated and Not Standardized</i></p> <p><i>Challenge 9: Legal Use of Federal Funds on Transportation Is Discouraged</i></p> <p><i>Challenge 10: Flexible Service Boundaries for Enhanced Mobility of Seniors and Individuals with Disabilities Program Is Not Expressly Allowed</i></p> <p><i>Challenge 11: Incidental Use Is Not Expressly Allowed</i></p>
State and Local Barrier: NEMT	<p><i>Challenge 12: VTS Is Not Expressly Allowed to Share Costs of Transportation and Transport Other Federal Program Beneficiaries</i></p>

E.5 Next Steps

The CCAM is committed to achieving its vision of equal access to coordinated transportation for all Americans. Mobility for All, the Council’s Strategic Plan, provides four goals to accomplish by the conclusion of 2022:

1. Improve access to community through transportation;
2. Enhance cost-effectiveness of coordinated transportation;
3. Strengthen interagency partnerships and collaboration with State, local, and industry groups; and
4. Demonstrate innovative coordinated transportation.

Each strategic goal is composed of two or three objectives further detailing how the CCAM will operate over the subsequent two years.

While several of these goals and objectives are partially achieved, the exact direction of the CCAM’s next steps will be heavily influenced by DOT’s continued leadership and what actions are taken to address the challenges identified in this report. Ultimately, access to human service transportation can be significantly improved by removing transportation coordination barriers and positioning CCAM agencies to better organize their transportation services. This will further enhance access to transportation for people with disabilities, older adults, and individuals of low income, and dramatically raise the standard of living of these targeted communities.

1.0 Introduction

Human service transportation is essential to greater economic independence, healthy living, and an improved quality of life for Americans nationwide. Despite its significance, millions of Americans lack access to reliable transportation. A disproportionate amount of this affected population represents people with disabilities, older adults, and individuals of low income—also called “transportation-disadvantaged” populations.

Similar to “transportation-disadvantaged” populations, rural communities, those affected by the opioid epidemic, and Veterans are impacted by gaps in public transportation services. Without reliable transportation coordination, these Americans are unable to access jobs, healthcare, healthy food, education, social services, family, and other essential aspects of their community.

Recognizing the importance of mobility and transportation coordination, President George W. Bush in 2004 issued Executive Order 13330: Human Service Transportation Coordination. The executive order established the CCAM, a Federal interagency partnership tasked to improve coordination and reduce duplication across Federal programs that fund transportation services. The CCAM was charged with issuing policy recommendations and implementing activities that improve the efficiency, accessibility, and availability of transportation for transportation-disadvantaged populations.

Since the CCAM’s inception, DOT has led the CCAM in numerous initiatives to enhance transportation coordination. However, more work was necessary to achieve its vision of equal access to coordinated transportation for all Americans. This report, as required by the FAST Act, details how the CCAM met the requirements above, culminating with the Access and Mobility for All Summit on October 29, 2019, sponsored by Secretary of Transportation Elaine L. Chao. Within this report, the CCAM identifies challenges that if addressed, may help eliminate barriers to transportation coordination. This report shall be provided to the President, the Committee on Transportation and Infrastructure of the House of Representatives, and the Committee on Banking, Housing, and Urban Affairs of the Senate.

This report contains the following sections:

- **Executive Summary:** Provides an overall summary of the key takeaways of this report.
- **Introduction:** Outlines briefly the purpose of this report.
- **CCAM Background:** Discusses the history of the CCAM up until the 2015 enactment of the FAST Act and a summarizes the CCAM’s actions since the FAST Act was enacted.
- **Addressing the FAST Act Requirements for a Strategic Plan:** Details how the CCAM has met each FAST Act requirement for a strategic plan.
- **Report to the President:** Identifies challenges that, if addressed, would eliminate Federal barriers to State and local transportation coordination.
- **Conclusion and Next Steps:** Discusses the CCAM’s next steps and future commitment to improve transportation coordination.
- **Acronyms:** Lists the common acronyms used throughout this report as well as their meanings.

- **Glossary:** Includes a list of terms used throughout this report and their definitions.
- **Appendix:** Provides links to major CCAM documents and work products, as well as other key documents that are referenced in this report.

2.0 CCAM Background

This section provides a brief history of the CCAM from inception through the 2015 enactment of the Fixing America’s Surface Transportation (FAST) Act, and a synopsis of the CCAM’s actions since the FAST Act was enacted.

2.1 History of the CCAM Through 2015

The Federal government has supported transportation coordination for more than thirty years. In 1986, DOT and HHS formed the first interagency council on transportation coordination after the House Committee on Public Works found that there was a lack of coordination amongst federally funded transportation services in rural areas. The council—known as the Joint DOT/HHS Coordinating Council on Human Service Transportation—was charged with improving the efficiency and effectiveness of specialized and human services transportation by promoting coordination at the Federal, State, and local level.

In the late 1980s, the newly established Joint DOT/HHS Coordinating Council on Human Service Transportation made progress towards this goal by launching an effort to identify statutory, regulatory, and programmatic barriers to transportation coordination. Ten regional work groups, enlisted by the council, solicited the viewpoints of stakeholders from across the country and identified 64 barriers to coordination.² The council addressed the barriers by recommending a Federal response for each, ranging from policy clarifications to largescale legislative changes.

For the next twenty years, the council continued to meet regularly. ED and DOL began to attend council work group meetings because of the opportunity to coordinate their programs that could fund transportation.

Spotlight: Transportation Coordination Legislation

1998: Transportation Equity Act for the 21st Century (TEA-21) encouraged DOT grantees to participate in coordinated planning processes.

2005: Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) required coordinated public transit-human services transportation plans of many FTA grantees and allowed Federal funding to be used as matching funds for specific transportation programs.

2012: Moving Ahead for Progress in the 21st Century Act (MAP-21) continued the transportation coordination requirements of SAFETEA-LU.

2015: Fixing America’s Surface Transportation Act (FAST Act) directed the CCAM to develop an updated strategic plan among other requirements.

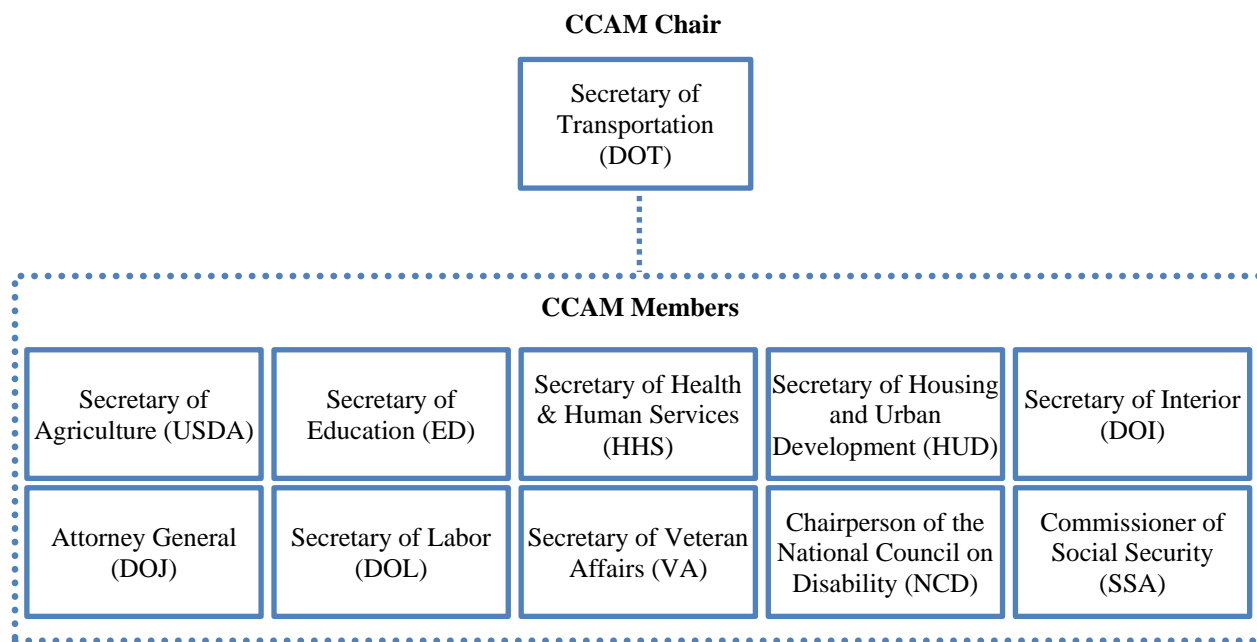
In 2003, the Joint DOT/HHS Coordinating Council on Human Service Transportation initiated the ten-year “United We Ride” campaign. United We Ride aimed to improve the availability, quality, and efficiency of transportation services for the transportation-disadvantaged. The council organized several activities through United We Ride, including awarding grants to

² “Transportation Coordination: Benefits and Barriers Exist, and Planning Efforts Progress Slowly.” U.S. General Accounting Office. 1999. <https://www.gao.gov/assets/230/228218.pdf>.

support coordinated planning and mobility management, issuing policy statements, and supporting technical assistance efforts.

In 2004, President George W. Bush issued Executive Order 13330 to improve the coordination of human service transportation for people with disabilities, older adults, and individuals of low income. The Executive Order established the CCAM, and the Council was expanded to its current membership of 11 Federal agencies.

Figure 3: Current CCAM Membership



In its first year, the new CCAM worked to set priorities and develop strategies to dismantle Federal barriers to transportation coordination. The CCAM issued an action plan in September 2004 to guide its initial activities and, as part of the action plan, issued the CCAM’s 2005 Report to the President. The report outlined goals and detailed action items in six areas: education and outreach, consolidated access, regulatory relief, coordinated planning, cost allocation, and useful practices. The Council established staff-level interagency work groups to implement the goals and action items and made significant progress. As a result of the work groups, the CCAM released policy statements on vehicle sharing and coordinated human service transportation planning. The CCAM continued to meet regularly through 2008.

From 2009 to 2015, the CCAM did not officially meet but it continued to make progress on removing barriers to transportation coordination. The CCAM published a **Strategic Plan** to guide its efforts from 2011 to 2013. Additionally, in 2011 and 2012, HHS, DOL, DOT, and VA coordinated to award more than \$64 million in Veterans Transportation and Community Living Initiative Grant (VTCLI) funding to support one-call/one-click transportation resource centers. The VTCLI program is further detailed in **3.5.5 Demonstration Projects**.

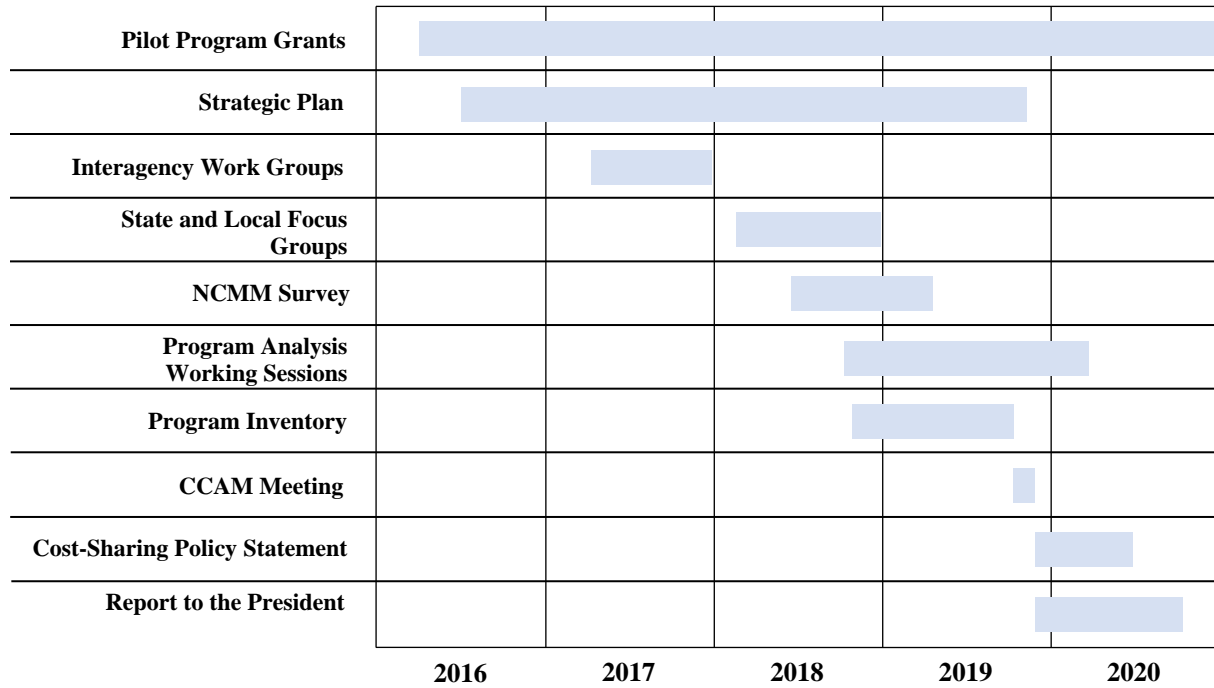
2.2 CCAM Actions Since the FAST Act

The enactment of the FAST Act in December 2015 reemphasized the importance of transportation coordination. Led by DOT, the CCAM undertook ten main activities to continue to coordinate Federal transportation resources. In order of completion, the activities are listed below:

1. Distributed **Pilot Program** grants;
2. Developed a new **CCAM Strategic Plan**;
3. Convened three Federal **Interagency Work Groups**;
4. Facilitated **CCAM State and Local Focus Groups**;
5. Analyzed the **National Center for Mobility Management (NCMM) Survey**;
6. Convened **Program Analysis Working Sessions** and published the **Federal Fund Braiding Guide**;
7. Developed the **CCAM Program Inventory**;
8. Gathered CCAM agencies for an official **CCAM meeting**;
9. Developed the **CCAM Cost-Sharing Policy Statement**; and
10. Led the development of this **Report to the President**.

The CCAM continued to address FAST Act requirements in 2016 by releasing a notice of funding opportunity (NOFO) and selecting projects for the first round of Transit and Health Access Initiative grants. The Council's final actions to meet the FAST Act requirements were the 2020 development of the CCAM Cost-Sharing Policy Statement and this report. In many cases, the results and outputs of an earlier activity influenced the trajectory of later activities as the CCAM learned more about Federal barriers to State and local transportation coordination. The timeline of the CCAM's actions is detailed in **Figure 4**, which shows the timeframe for each activity, including the development and concurrence of any resulting documents.

Figure 4: Timeline of the CCAM's Post-2015 Activities



CCAM agencies' individual participation is summarized in **Figure 5**.

Figure 5: CCAM Agency Participation in Post-2015 Activities

	USDA	ED	HHS	HUD	DOI	DOJ	DOL	DOT	VA	NCD	SSA
Pilot Program Grants	✓	✓	✓	✓		✓	✓	✓	✓		
Strategic Plan Development/Finalization	✓	✓	✓				✓	✓	✓		
Interagency Work Groups	✓		✓	✓	✓	✓	✓	✓	✓	✓	✓
Focus Group/NCMM Survey Participant Selection	✓	✓	✓	✓			✓	✓	✓		
Program Analysis Working Sessions	✓		✓			✓		✓	✓		
Program Inventory Development	✓	✓	✓	✓		✓	✓	✓	✓		✓
CCAM Meeting	✓	✓	✓	✓		✓	✓	✓	✓	✓	
Cost-Sharing Policy Statement			✓					✓	✓		
Report to the President	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓

2.2.1 Pilot Program Grants

Section 3006(b) of the FAST Act created the Innovative Coordinated Access and Mobility Pilot Program (Pilot Program Grants). Pilot Program Grants must be used for capital projects to improve the coordination of nonemergency medical transportation (NEMT) for transportation-disadvantaged populations.

Though these funds were appropriated to FTA, the agency deployed the Pilot Program Grants in a way to demonstrate FTA and DOT's continued commitment to broader transportation coordination. The three iterations of the program, described below, encouraged local transportation coordination by funding projects that strengthened transportation-human services ties. In preparation for the FY2020 pilot, the Mobility for All Pilot Program, FTA hosted two staff-level meetings to solicit input from CCAM agencies on the direction and specific focus of the FY2020 pilot program. Representatives from USDA, ED, HHS, HUD, DOJ, DOL, and DOT attended and provided comments and input.

FTA published three notices of funding opportunity (NOFO) for this pilot program:

- In FY2016, FTA issued the “**Rides to Wellness Demonstration and Innovative Coordinated Access and Mobility Grants**” NOFO. FTA awarded FY2016 and FY2017 funds across 11 projects totaling \$7.2 million. Projects included rural volunteer-based transit services to improve the coordination of NEMT, one-call/one-click centers, embedding transportation networks into hospital discharge planning, and more.

Project Spotlight: Knoxville Area Transit's 2-1-1 Service

The Knoxville Area Transit (KAT) 2-1-1 service is a free program that provides personal travel assistance and training to Knoxville residents. KAT **received \$200,000 through the Rides to Wellness Demonstration and Innovative Coordinated Access and Mobility Grants in 2016** to expand the 2-1-1 call center as a single point of entry for older adults and people with disabilities to access transit to healthcare facilities in the Knoxville area region. KAT partnered with Cherokee Health Systems, the Knox County Health Department, and the Knoxville Regional Transportation Planning Organization to improve and expand the 2-1-1 service. The 2-1-1 service continues to leverage travel trainers to provide direct assistance to Knoxville residents to get to medical appointments independently.³

- In FY2019, FTA issued the “**Access and Mobility Partnership Grants**” NOFO. FTA awarded FY2018 and FY2019 funds across 23 projects totaling \$7.4 million. Projects include on-demand vehicle dispatch, transportation smartphone app technology, NEMT trip scheduling software development, and more.
- In FY2020, FTA issued the “**Mobility for All Pilot Program Grants**” NOFO. FTA awarded FY2020 funds across 17 projects totaling \$3.5 million. Projects include coordinated demand response software, a mobile learning lab to assist targeted populations navigate transit systems, mobility managers to increase transportation coordination, and more.

³ “Call 2-1-1: Board the Bus to Better Health.” Knoxville Area Transit. 2020. <https://www.katbus.com/267/Rides-to-Wellness>.

2.2.2 Strategic Plan

In 2016, DOT convened several CCAM agencies to begin a strategic planning process informed by agency input, lessons learned, industry insights, and the evolving transportation needs of the American public. Representatives from USDA, ED, HHS, DOL, DOT, and VA participated in the initial development of the CCAM Strategic Plan, and representatives from all CCAM agencies were offered the opportunity to provide final comments and input prior to its adoption.

The CCAM Strategic Plan, Mobility for All, establishes a mission and vision for the CCAM that capture the Council's goal for coordinated transportation.

Mission

The Coordinating Council on Access and Mobility issues policy recommendations and implements activities that improve the availability, accessibility, and efficiency of transportation for targeted populations.

Vision

Equal access to coordinated transportation for all Americans.

The Strategic Plan also entails four strategic goals, each of which has substantiating objectives to further guide the CCAM's actions. These goals and objectives are included in **Figure 6** below.

Figure 6: The CCAM's 2019–2022 Strategic Goals and Objectives

Goal 1: Improve access to community through transportation <ul style="list-style-type: none">• Objective 1: Reduce Federal policy barriers to coordinated transportation• Objective 2: Encourage State and local transportation coordination• Objective 3: Promote public awareness of available transportation options
Goal 2: Enhance cost-effectiveness of coordinated transportation <ul style="list-style-type: none">• Objective 1: Enable and promote equitable cost sharing• Objective 2: Develop framework for transportation cost reporting• Objective 3: Advance awareness of Federal fund braiding opportunities
Goal 3: Strengthen interagency partnerships and collaboration with State, local, and industry groups <ul style="list-style-type: none">• Objective 1: Refresh the CCAM operating model• Objective 2: Promote coordinated transportation initiatives for targeted populations• Objective 3: Expand opportunities for external input
Goal 4: Demonstrate innovative coordinated transportation <ul style="list-style-type: none">• Objective 1: Implement and evaluate CCAM pilot programs• Objective 2: Incorporate the use of innovative technologies in coordinated transportation

The 2019–2022 CCAM Strategic Plan was adopted at the CCAM meeting held directly prior to the Access and Mobility for All Summit on October 29, 2019. The CCAM Strategic Plan will guide Council activities through 2022. Further detail on the CCAM's strategic goals and objectives is available in the 2019–2022 CCAM Strategic Plan, available in item 14 in the **Appendix**.

2.2.3 Interagency Work Groups

The DOT sponsored in 2017 three Federal interagency work groups on behalf of the CCAM to identify and address barriers to coordinated transportation. The work groups each met approximately ten times over the course of four months. Ten of the 11 CCAM agencies participated in at least one of the work groups, and work group participants were career Federal staff.

Figure 7: Interagency Work Groups: Participating Agencies and Operating Divisions

Agency	Operating Division(s) and Sub-Organization(s)
USDA	Rural Development
HHS	<ul style="list-style-type: none">• Administration for Children and Families• Administration for Community Living• Centers for Medicare and Medicaid Services• Center for Faith-Based and Neighborhood Partnerships• Office of the Assistant Secretary for Health• Substance Abuse and Mental Health Services Administration
HUD	Office of Policy Development and Research
DOI	Office of the Secretary
DOJ	Civil Rights Division
DOL	Office of Disability Employment Policy
DOT	<ul style="list-style-type: none">• Federal Highway Administration• Federal Transit Administration
VA	Veterans Health Administration
NCD	Policy and Legal Team
SSA	Office of Retirement and Disability Policy

Two of the three interagency work groups focused on a type of transportation coordination barrier faced by State and local grantees: The first focused on cost allocation, and the second on vehicle-sharing policies. The third interagency work group focused on Federal interagency collaboration barriers. All three work groups identified barriers and developed recommendations to address these barriers. The focus of the three work groups is described in more detail below.

- **Cost Allocation Work Group:** Barriers that may prevent Federal funding recipients from sharing project costs with one or more partners or funding sources.
- **Policy Work Group:** Barriers that may prevent Federal funding recipients from sharing vehicles or funding vehicles with one or more Federal funding sources.
- **Interagency Collaboration Work Group:** Barriers that prevent CCAM agencies from coordinating effectively to accomplish Council goals.

The work groups produced an initial set of recommendations for Federal action to address these barriers. Products from the work groups helped to inform the development of this final report.

More details on the interagency work groups are available in the Joint Work Group Meeting Minutes, available in item 10 in the **Appendix**.

2.2.4 State and Local Focus Groups

DOT facilitated, on behalf of the CCAM, a series of focus groups in spring 2018 that brought together transportation and human services stakeholders (including aging, disability, employment and training, and housing services) to identify coordination challenges at the State and local level. The objectives of the focus groups were to:

- Understand the **current state** of transportation services for people with disabilities, older adults, and individuals of low income;
- Identify transportation **coordination success stories** and promising practices; and
- Identify **barriers** to transportation coordination.

Through a combination of virtual and in-person focus groups, interviews, and industry listening sessions, the CCAM engaged over 200 stakeholders representing 22 States. Participating stakeholders included funding recipients from seven CCAM agencies: USDA, ED, HHS, HUD, DOL, DOT, and VA.

During the State and local focus group sessions, the CCAM identified ten primary barriers to local transportation coordination that occurred across stakeholder groups, displayed in **Figure 8**.

Figure 8: CCAM Focus Groups: Top Ten Barriers to Local Transportation Coordination

Rank	Barrier	Definition
1	Limited Awareness	A lack of awareness of the Federal funding sources available for human service transportation, the policies that enable transportation coordination, and/or the community's transportation options for targeted populations
2	Unengaged Stakeholders	Challenges associated with establishing and maintaining the organizational and community partnerships necessary to pursue transportation coordination
3	Program Restrictions	Reporting obligations, eligibility criteria, trip purpose restrictions, and other program rules that make it difficult to coordinate across different transportation programs
4	Insufficient Incentives	A lack of incentives or financial motivation for human service providers to pursue transportation coordination initiatives
5	Limited Federal Guidance	An absence of Federal guidance that States and local communities need to coordinate transportation in compliance with Federal law
6	Jurisdictional Boundaries	City, county, or other regional lines that define an organization's service area and prevent that organization from coordinating with other entities beyond the service area
7	Administrative Burden	The accounting obligations, logistical responsibilities, implementation work, and other administrative tasks that consume an excessive amount of time and resources

Rank	Barrier	Definition
8	Insufficient Data	A lack of the data that States and local communities need to increase the transparency of transportation spending, demonstrate the utility of transportation coordination, and allocate the costs of coordinated transportation equitably
9	Cost-Sharing Concerns	Apprehension about sharing the costs of coordinated transportation across participating stakeholders in a way that is equitable and proportionate to the services received
10	Inaccessible Systems	Transportation vehicles and facilities that funding recipients cannot use for some coordination activities because they are inaccessible to people with functional limitations

The CCAM also identified promising practices and transportation coordination success stories across the Nation. The full results of the State and local focus groups are available in the Focus Group Report, item 9 in the **Appendix**.

2.2.5 NCMM Survey

The CCAM leveraged the NCMM, an FTA-funded national technical assistance center to improve the coordination of transportation services. NCMM conducted a nationwide survey on transportation coordination best practices and barriers, which supplemented the CCAM focus group findings. The survey targeted individuals who worked at transportation and human services organizations, including public, private, and nonprofit organizations, in rural and non-rural areas. The survey was conducted from June through November 2018 and engaged 527 respondents across 47 States and the District of Columbia.

NCMM survey respondents noted a variety of benefits from coordinating transportation, including that it enhances the ability to serve constituents, improves the quality and cost-effectiveness of transportation services, and enables their organizations to serve more people. Despite these benefits, more than a fourth of respondents confirmed that their organizations do not participate in transportation coordination, while nearly half noted their respective States do not promote transportation coordination.

Additionally, NCMM survey respondents shared that organizations face a variety of barriers to transportation coordination. The five most commonly reported barriers were:

- Lack of time and/or staff,
- Lack of available transportation,
- Lack of cost-sharing arrangements or reimbursement structures,
- Inability to secure local match funding, and
- Complexity of reporting or other administrative requirements.

These barriers correspond directly to several of the most prevalent barriers uncovered in the State and local focus groups.

While the CCAM may not be able to address some barriers, like organizations' lack of time and staff resources to coordinate transportation, it has taken steps to address other barriers. In 2018

and 2019, the CCAM conducted the Program Analysis Working Sessions to address two areas: the inability to secure local match funding and lack of cost-sharing arrangements.

The full results of the NCMM survey are available in the NCMM Survey Analysis, available in item 11 in the **Appendix**. Additionally, the NCMM survey results segmented by CCAM agency are available in item 12 in the **Appendix**.

2.2.6 Program Analysis Working Sessions

In the State and local focus groups, participants—especially those in rural areas—stated that their organizations were often unable to secure local match funding due to budget constraints, which meant forfeiture of Federal grant funds, thus decreasing the amount of available transportation in their communities. The ability to use Federal funds to fulfill the local match requirement of another Federal grant (“Federal fund braiding for local match,” or “Federal fund braiding”) would help alleviate this barrier. However, State and local stakeholders were unsure when Federal fund braiding was legally permissible due to a lack of clear Federal guidance on the subject.

Definition: Federal Fund Braiding

Federal fund braiding for local match, also referred to as Federal fund braiding, is when Federal funds from one grant program are used to fulfill the local match requirement of another Federal grant. All statutory and regulatory requirements, such as eligibility and reporting, must be met for both programs.

In 2018 and 2019, DOT convened, on behalf of the CCAM, staff-level Program Analysis Working Sessions to address these barriers and develop a CCAM resource guide to provide clarity on acceptable Federal fund braiding for local match opportunities. Operating divisions within USDA, HHS, DOJ, DOT, and VA participated and provided program-specific information.

The CCAM selected the participating operating divisions by prioritizing those that:

- Focused on NEMT; or
- Gained new programs that may fund transportation through the Affordable Care Act, the response to the opioid crisis, or other initiatives.

Of the 11 operating divisions that the CCAM invited to participate in the Program Analysis Working Sessions, nine participated.

Figure 9: Program Analysis Working Sessions: Participating Agencies and Operating Divisions

Agency	Operating Division(s) and Sub-Organization(s)
USDA	<ul style="list-style-type: none"> • Food and Nutrition Services • Rural Development
HHS	<ul style="list-style-type: none"> • Administration for Children and Families • Administration for Community Living • Centers for Disease Control and Prevention
DOJ	Office of Justice Programs
DOT	<ul style="list-style-type: none"> • Federal Highway Administration • Federal Transit Administration
VA	Veterans Health Administration

For Federal fund braiding to occur, the authorizing statute of at least one of the two participating programs (either the program whose match requirement is being met with Federal funds, or the program whose funds are fulfilling the other program’s match requirement) must expressly authorize such an arrangement. This requirement is established in the OMB Uniform Guidance.

In total, 61 CCAM agency programs were discussed in the working sessions. Of the 61 programs, only eight programs expressly allow their match requirements to be fulfilled by other Federal programs (“incoming Federal fund braiding”), and only two programs expressly allow their funds to fulfill the match requirement of other Federal programs (“outgoing Federal fund braiding”). Because few programs have the express authorization to allow Federal fund braiding, this form of cost sharing is relatively uncommon.

The full results of the Program Analysis Working Sessions are available in the Federal Fund Braiding Guide, available in item 7 in the **Appendix**.

2.2.7 Program Inventory Development

Concurrently with the Program Analysis Working Sessions in 2018 and 2019, the CCAM gathered information on which CCAM agency programs may fund transportation for people with disabilities, older adults, and individuals of low income. Eight CCAM agencies (USDA, ED, HHS, HUD, DOJ, DOL, VA, and SSA) responded to information requests from DOT, which spearheaded this effort. NCD did not participate in this effort because it does not fund grant programs.

Agencies were asked to provide information about any program that may theoretically and legally fund transportation, even if grantees did not usually expend funds on transportation. The requested information included program purpose, annual spending on transportation (if available), primary CCAM population served, definitions of older adult and people with disabilities, and other program data. In total, the CCAM identified 130 Federal programs as of October 2019, that may fund transportation for the CCAM’s three targeted populations. The CCAM published the **CCAM Program Inventory**, available in item 4 in the **Appendix**, to share the collected program information with Federal agencies and grantees.

2.2.8 CCAM Meeting

On October 29, 2019, FTA Acting Administrator K. Jane Williams convened the CCAM as Secretary of Transportation Elaine L. Chao's delegate. Delegates from the other ten CCAM agencies were invited to attend and eight attended. The participating CCAM agencies, their delegates, and other official attendees are listed in **Figure 10**.

Figure 10: 2019 CCAM Meeting Attendees

Department of Agriculture <i>Anne DeCesaro, Director of Policy and Regulatory Coordination, Food, Nutrition, and Consumer Services</i>
Department of Education <i>Erin McHugh, Senior Advisor, Acting Principal Deputy Assistant Secretary, Office of Planning, Evaluation and Policy Development</i>
Department of Health and Human Services <ul style="list-style-type: none">• <i>Leith States, Acting Chief Medical Officer, Office of the Assistant Secretary for Health</i>• <i>Mary Lazare, Principal Deputy Administrator, Administration for Community Living</i>
Department of Housing and Urban Development <i>Seth Appleton, Assistant Secretary for Policy Development and Research</i>
Department of Justice <i>Ed Puccerella, Senior Advisor, Office of the Assistant Attorney General</i>
Department of Labor <i>Mark Zelden, Director, Centers for Faith and Opportunity Initiative</i>
Department of Transportation <ul style="list-style-type: none">• <i>K. Jane Williams, Acting Administrator, Federal Transit Administration</i>• <i>Bruce Robinson, Associate Administrator, Office of Program Management, Federal Transit Administration</i>
Department of Veterans Affairs <ul style="list-style-type: none">• <i>Garth Miller, Executive Director of Member Services, Veterans Health Administration</i>• <i>Michael Akinyele, Acting VA Chief Innovation Officer and Executive Director of the VA Innovation Center</i>
National Council on Disability <i>Neil Romano, Chairman</i>

Following final review of the **CCAM Strategic Plan** by delegates prior to the CCAM meeting, Acting Administrator Williams stewarded official adoption of the CCAM Strategic Plan at the 2019 CCAM meeting.

Acting Administrator Williams then led discussion on recent CCAM work, including State and local focus groups, interagency work groups, and Program Analysis Working Sessions.

Principal Deputy Administrator of the Administration for Community Living (ACL) Mary Lazare presented on ACL's coordination with FTA on transportation.

The two VA representatives, Acting VA Chief Innovation Officer and Executive Director of the VA Innovation Center Michael Akinyele and Executive Director of Member Services Garth Miller, shared insights from the VA’s innovative work to coordinate and provide NEMT for Veterans. The VA representatives also provided a demonstration of the VA’s VetRide technology after the meeting.⁴

Finally, the CCAM agency delegates committed their agencies to participate in the development of this report, the 2020 Report to the President, including the identification of challenges that if addressed, would promote local transportation coordination. The delegates from HHS and VA committed to participate in the development of a CCAM cost-sharing policy statement focused in part on NEMT. Following the CCAM meeting, agency delegates each appointed an agency point of contact (POC) to maintain engagement with CCAM initiatives.

The CCAM meeting agenda and slides used to guide the discussion are available respectively in items 2 and 3 in the **Appendix**.

2.2.9 Cost-Sharing Policy Statement

As a result of the 2019 CCAM meeting, the CCAM committed to developing the CCAM Cost-Sharing Policy Statement. To pilot the development process and determine the feasibility for a CCAM-wide policy, the Council focused on Centers for Medicare and Medicaid Services (CMS) and VA programs.

Definition: Cost Sharing
Cost sharing occurs when partners share common costs of a transportation service or a transportation project in a manner that is based equitably on the benefit received. Cost-sharing arrangements include both Federal fund braiding for local match as well as vehicle and ride sharing across Federal programs.

Focusing on CMS and VA programs was the most logical, as a preliminary cost-sharing policy statement could positively affect many travelers while targeting as few as four Federal programs. In FY2018, Medicaid as well as three VA transportation programs—just four of the 130 currently identified Federal programs that may fund transportation—spent a total of \$2.4 billion on NEMT in FY2018. Additionally, CMS was the largest non-DOT Federal funder of human service transportation for transportation-disadvantaged populations in FY2018. This sizable amount of transportation funding compared to other non-DOT CCAM agencies makes CMS and VA’s participation in a successful cost-sharing policy crucial.

In the future, the CCAM may further develop the CCAM Cost-Sharing Policy Statement to include other CCAM programs to enhance the use of Federal funds and to support program beneficiaries.

⁴ “VetRide Homepage.” VetRide. 2019. <https://www.vetride.va.gov/>.

Cost-Sharing Policy Statement Development

DOT led two working sessions with CMS and VA in 2019 and 2020 to develop a cost-sharing policy statement that addresses NEMT by including CMS- and VA-specific principles for vehicle and ride sharing. The ACL observed the working sessions.

During this development phase, the CCAM determined that two of the three VA NEMT programs cannot participate in vehicle and ride sharing. The Veterans Transportation Service only allows eligible Veterans to be transported with its vehicles, and the Beneficiary Travel program only permits the reimbursement of transportation costs to Veterans, not the direct payment to transportation providers. Therefore, DOT, CMS, and VA discussed general cost sharing principles, as well as principles specific to Medicaid and the VA's Highly Rural Transportation Grants program.

Cost-Sharing Policy Statement

DOT, CMS, and VA co-developed the CCAM Cost-Sharing Policy Statement, which the entire CCAM endorsed.

The CCAM Cost-Sharing Policy Statement consists of a brief policy statement, as well as information and resources for grantees on two types of transportation cost sharing: **vehicle and ride sharing** and **Federal fund braiding**. The policy statement reads:

CCAM agencies agree that Federal grantees should coordinate their transportation resources where possible, including sharing costs for mutually beneficial transportation services, in order to maximize the availability and efficiency of transportation services.

–CCAM Cost-Sharing Policy Statement

The **vehicle and ride sharing** section of the CCAM Cost-Sharing Policy Statement shares information about establishing a local cost-sharing agreement, including a link to the FTA Cost-Allocation Handbook for additional high-level guidance on how to assign costs in a transportation cost allocation agreement. It also contains 15 principles on how to develop an equitable and legally compliant local cost-allocation agreement: nine general principles that apply to any local cost-allocation agreement, two principles specific to Medicaid, and four principles specific to the VA's Highly Rural Transportation Grants program.

The **Federal fund braiding** section directs grantees to use the Federal Fund Braiding Guide to determine if it is possible to share the cost of a mutually beneficial transportation project across multiple CCAM agency programs. It also refers grantees to the CCAM Program Inventory to identify potential local area partners and other CCAM agency grantees that provide human service transportation.

The **CCAM Cost-Sharing Policy Statement** is available in item 1 in the **Appendix**.

2.2.10 Report to the President

Following the 2019 CCAM meeting, CCAM agency POCs met to discuss the development of the Report to the President, including the development and finalization of agency-specific and CCAM-wide challenges to include in the report.

The names and titles of the agency POCs that led their agencies' contributions to, and review of, this report are included in **Figure 11**.

Figure 11: CCAM Agency POCs

Department of Agriculture Wesley A. Gwinn, <i>Confidential Assistant, Office of the Under Secretary for Research, Education and Economics</i>
Department of Education Erin McHugh, <i>Senior Advisor, Acting Principal Deputy Assistant Secretary, Office of Planning, Evaluation and Policy Development</i>
Department of Health and Human Services Leith States, <i>Acting Chief Medical Officer, Office of the Assistant Secretary for Health</i>
Department of Housing and Urban Development Meena Bavan, <i>Policy Analyst</i>
Department of the Interior Carol Brown, <i>Senior Counselor, Bureau of Indian Affairs</i>
Department of Justice Ed Puccerella, <i>Senior Advisor, Office of the Assistant Attorney General</i>
Department of Labor Patrick Mannix, <i>Chief of Staff, Office of Disability Employment Policy</i>
Department of Transportation Marianne Stock, <i>Division Chief of Rural and Targeted Programs, Federal Transit Administration</i>
Department of Veterans Affairs Benjamin Williams, <i>Director, Compliance & Internal Controls, Member Services</i>
National Council on Disability Amy Nicholas, <i>Attorney Advisor</i>
Social Security Administration Leola Brooks, <i>Senior Advisor, Office of Retirement and Disability Policy</i>

The meeting objectives are detailed below:

- **Meeting 1 (November 2019):** Agency POCs reviewed FAST Act requirements for the CCAM, discussed the timeline for the report's development and concurrence, and were asked to submit by January 2020 any agency-specific challenges that if addressed, would improve State and local transportation coordination. HHS, DOL, DOT, NCD, and SSA attended.
- **Meeting 2 (February 2020):** Agency POCs discussed several draft CCAM-wide challenges that if addressed, would improve CCAM engagement. USDA, HHS, HUD, DOJ, DOL, DOT, VA, and NCD attended.

- **Meeting 3 (February 2020):** Agency POCs discussed several draft CCAM-wide challenges that if addressed, would improve State and local transportation coordination and reviewed the concurrence timeline for the report. USDA, ED, HHS, DOJ, DOT, and NCD attended.

DOT, as the Secretary of Transportation is the CCAM Chair, led the development of the report and updated draft versions following conversations with CCAM agency POCs. CCAM member agencies were provided opportunities to comment and concur on this report.

3.0 Addressing the FAST Act Requirements for a Strategic Plan

The Council shall publish a strategic plan for the Council that—

- A. outlines the role and responsibilities of each Federal agency with respect to local transportation coordination, including nonemergency medical transportation;
- B. identifies a strategy to strengthen interagency collaboration;
- C. addresses any outstanding recommendations made by the Council in the 2005 Report to the President relating to the implementation of Executive Order No. 13330, including—
 - i. a cost-sharing policy endorsed by the Council; and
 - ii. recommendations to increase participation by recipients of Federal grants in locally developed, coordinated planning processes;
- D. to the extent feasible, addresses recommendations by the Comptroller General concerning local coordination of transportation services;
- E. examines and proposes changes to Federal regulations that will eliminate Federal barriers to local transportation coordination, including non-emergency medical transportation; and
- F. recommends to Congress changes to Federal laws, including chapter 7 of title 42, United States Code, that will eliminate Federal barriers to local transportation coordination, including nonemergency medical transportation.

—FAST Act Section 3006(c)(2)

The FAST Act is a five-year funding and authorization bill enacted in December 2015 to improve the Nation’s surface transportation infrastructure, including roads, bridges, transit systems, and the passenger rail network. The FAST Act includes authorizations and reforms to enable the Federal Government to address the country’s transportation needs, including improved nationwide access to transportation services for people with disabilities, older adults, and individuals of low income. In order to improve Federal coordination to serve these transportation-disadvantaged populations, the FAST Act includes specific requirements for the CCAM in the development of a Strategic Plan, which incorporate nested and overlapping requirements from the 2005 Report to the President and two 2014 GAO reports.

The strategic plan requirements of the FAST Act and the recommendations of the 2005 Report to the President and the GAO, along with their respective locations in this report, are outlined in **Figure 12**.

Figure 12: CCAM Strategic Plan Requirements Mapped to Report Sections

Section in this Report	CCAM Requirement/Recommendation	Source of Requirement: FAST Act	Source of Requirement: 2005 Report to the President	Source of Requirement: 2014 GAO Reports
3.2	Outline the roles and responsibilities of each CCAM agency with respect to local transportation coordination	✓		
3.3	Identify a strategy to strengthen interagency collaboration	✓		
3.4	Develop a cost-sharing policy in compliance with applicable Federal laws	✓	✓	✓
3.5	<ul style="list-style-type: none"> Seek mechanisms to require participation in a community transportation planning process Promote vehicle sharing with recipients and sub-recipients of other Federal programs Develop a method of reporting and evaluation Pilot 10 to 12 demonstration projects 		✓	
3.6	<ul style="list-style-type: none"> Promote NEMT coordination by identifying challenges associated with coordinating NEMT Define and report on desired outcomes and collect data to track and measure results 			✓
3.7	Submit a report containing final recommendations of the Council to the President and Congress	✓		

This section discusses how the CCAM has met each of these requirements and relates the CCAM’s actions from 2016 to 2020, as described in **2.2 CCAM Actions Since the FAST Act**, to each of these requirements.

3.1 Strategic Plan

In addition to the FAST Act requirement that the CCAM publish a strategic plan, the GAO issued in December 2014 a recommendation that the CCAM convene and adopt a **strategic plan** that outlines a strategy to coordinate Federal NEMT, in addition to other requirements.

The CCAM convened on October 29, 2019 and adopted the 2019–2022 CCAM Strategic Plan, which is discussed in **2.2.2 Strategic Plan**. The Strategic Plan includes four goals with accompanying objectives, all of which apply to all Federal transportation coordination efforts, including NEMT. The CCAM has met the other FAST Act requirements for the Strategic Plan, as detailed in **3.0 Addressing the FAST Act Requirements for a Strategic Plan**.

The full CCAM Strategic Plan for 2019 through 2022 is available in item 14 in the **Appendix**.

3.2 CCAM Roles and Responsibilities

The Council shall...

- A. outline the role and responsibilities of each Federal agency with respect to local transportation coordination, including nonemergency medical transportation.

—FAST Act Section 3006(c)(2)

The CCAM consists of 11 agencies, each of whom participate through the support of Federal employees of various staff levels.⁵ Outside of CCAM-led initiatives, each individual agency is also responsible for organizing transportation coordination efforts as they relate to agency missions and targeted populations. The CCAM has documented its current staff- and agency-level roles and responsibilities as a preliminary step to refreshing the CCAM operating model, which is an objective of the 2019–2022 Strategic Plan.

3.2.1 Staff Roles and Responsibilities

Through Executive Order 13330 and CCAM agency input, the Council identified key roles that support interagency coordination on transportation within each CCAM agency. These staff members are organized into three groups based on staff level:

- **CCAM members:** Provide strategic direction to the CCAM;
- **CCAM agency points of contact (POCs):** Serve as liaisons between their agency and the CCAM; and
- **CCAM agency support staff:** Provide day-to-day support of CCAM functions.

The key responsibilities of each staff level outlined in the CCAM operating model are described below in descending order of seniority.

CCAM members are the official Cabinet-level members of the CCAM, as identified by Executive Order 13330, or their designees. CCAM member designees may be officers appointed by the President or full-time employees serving in a GS-15 position or above. These members are responsible for providing strategic direction to the CCAM and performing functions of the Council. CCAM members participated in the 2019 CCAM meeting and adopted the CCAM 2019–2022 Strategic Plan.

CCAM agency POCs are liaisons between an agency and the CCAM, selected by an agency's CCAM member as an output of the 2019 CCAM meeting. Agency POCs manage the agency's operating divisions' interactions with the CCAM, if applicable. Most recently, agency POCs coordinated the identification of agency-specific challenges and barriers to transportation coordination.

⁵ "CCAM Agencies." Coordinating Council on Access and Mobility. 2020. <https://www.transit.dot.gov/ccam/about/agencies>.

CCAM agency support staff provide day-to-day support of CCAM functions, including maintaining momentum on the CCAM’s strategic goals. From 2017 to 2019, CCAM agency support staff collaborated with agency POCs in CCAM work groups on topics such as cost allocation, policy, and interagency collaboration. This allowed CCAM agency support staff to share vital agency-specific transportation coordination information, identify challenges posed by current Federal law, regulations, and guidance, and recommend internal operational activities to promote transportation access and availability. These activities and outputs are further detailed in **2.2 CCAM Actions Since the FAST Act**.

3.2.2 Individual Agency Roles and Responsibilities

Per Executive Order 13330, the Secretary of Transportation serves as the Chair of the CCAM. DOT leads most CCAM initiatives and FTA—on behalf of DOT—liaises with CCAM agencies to improve coordinated transportation.

Roles of CCAM agencies in transportation coordination efforts are dependent on the mission of the agency and the nature of the programs that provide transportation to transportation-disadvantaged populations. Individual agencies are responsible for coordinating with other Federal agencies and operating divisions that also address the mission of their organization. For example:

- **NEMT:** VA programs, as well as many HHS programs, fund NEMT. Therefore, VA and HHS are responsible for proactively coordinating programs that may fund NEMT.
- **Employment-related transportation:** DOL programs provide transportation services to help Americans access employment. Therefore, DOL is responsible for proactively coordinating with other CCAM agencies that have programs that may fund transportation for employment.
- **Transportation in rural areas and for individuals of low income:** USDA programs focus on serving rural and low-income populations. Therefore, USDA is responsible for proactively coordinating with other CCAM agencies that have programs that specifically serve rural and low-income populations.

3.3 Strategy to Strengthen Interagency Collaboration

The Council shall...

B. identify a strategy to strengthen interagency collaboration.

—*FAST Act Section 3006(c)(2)*

Interagency collaboration, as it relates to the Council, is the process by which CCAM agencies work together and achieve the goals outlined in the CCAM Strategic Plan. The CCAM continuously conducts activities to enhance coordination and improve communications to promote new resources for CCAM partners. These activities have enabled CCAM agencies and their operating divisions to share transportation coordination best practices, learn about existing transportation initiatives, and identify opportunities to reduce duplication and increase partnerships. As the CCAM works to implement the 2019–2022 Strategic Plan, the Council will:

1. Initiate and manage **coordination-focused activities**;
2. Deploy a **communications strategy to promote resources**; and
3. Move towards a **future operating model**.

3.3.1 Coordination-Focused Activities

As part of the CCAM’s strategy to strengthen interagency collaboration, the CCAM tracks its activities to enhance transportation coordination in the **CCAM Summary of Activities**.⁶ This document is a comprehensive summary of CCAM agency and interagency activities (e.g. interagency meetings, stakeholder engagements, funding opportunities, trainings, etc.), and is updated quarterly and posted to the CCAM website. The Summary of Recent Activities identifies 49 discrete activities undertaken in 2019 by CCAM agencies independently, or in partnership, to increase coordination. This is a notable increase from the 38 activities identified in 2018, and the 31 activities in 2017.

High-profile coordination-focused activities include:

- The **CCAM’s 2020 Webinar Series** to promote Federal Fund Braiding opportunities and the CCAM Program Inventory. These webinars provide clear, unified messaging to grantees and are targeted to specific CCAM agencies’ grantees to increase participation;
- The 2019 and 2020 CCAM effort (involving DOT, HHS, and VA) to produce the **CCAM Cost-Sharing Policy Statement**;
- The 2018 and 2019 Federal CCAM working sessions to produce the **Federal Fund Braiding Guide** and **CCAM Program Inventory**; and
- The 2017 **Federal CCAM working sessions** on vehicle sharing policies, cost allocation, and interagency collaboration.

Spotlight: Joint DOL/DOT Online Dialogue

In fall 2019, DOL and DOT co-hosted the Barriers and Solutions to Complete Trips for All National Online Dialogue to gather ideas from stakeholders on potential solutions to address barriers traveling to employment and other activities. Nearly 200 stakeholders from across the country participated, including people with disabilities, transportation representatives, advocacy organizations, and State and local government representatives. DOL and DOT gathered several valuable takeaways that will guide their future work to increase workforce participation and independent living for people with disabilities.

The CCAM will continue to implement activities that enhance Federal transportation coordination, as well as track its progress in doing so.

3.3.2 Communications Strategy to Promote CCAM Resources

The CCAM recognizes that clear communications with Federal, State, and local stakeholders is an important component of strengthening interagency collaboration. In order to do so, the CCAM uses a centralized CCAM website, which serves as a hub for CCAM resources and

⁶ “CCAM Summary of Activities.” Coordinating Council on Access and Mobility. 2020. <https://www.transit.dot.gov/regulations-and-guidance/ccam/about/ccam-summary-activities>.

information. CCAM agencies as well as State and local entities use the website to locate CCAM resources and information, such as:

- **Federal Fund Braiding Guide:** A resource that defines Federal fund braiding and program eligibility to enable Federal agencies and Federal grant recipients to more effectively manage Federal funds and coordinate human services transportation services; and
- **CCAM Program Inventory:** A catalog identifying 130 Federal programs that may provide funding for human service transportation for people with disabilities, older adults, and/or individuals of low income.

These resources encourage coordination by providing guidance to transportation providers, Federal agencies, and other grantees that is necessary to effectively partner. All efforts and progress are documented and used to improve efforts moving forward and show progress on the Strategic Plan goals. Going forward, the CCAM will continue to post new resources and information on the CCAM website and will host joint interagency webinars as needed to ensure that State and local stakeholders can find the resources that apply to them.

3.3.3 Future Interagency Collaboration Model

The collective efforts of the CCAM will have a stronger impact on improving transportation access to transportation-disadvantaged populations than any single agency's efforts. Therefore, the CCAM's future model for interagency collaboration must further encourage cooperation and track progress.

As described in **Challenge 2: Improving Technical Assistance Delivery**, a **multiagency CCAM Technical Assistance Center** would provide guidance to grantees on programs that may fund transportation services, including nonemergency medical transportation (NEMT), across CCAM agencies. The Center would serve as a clearinghouse for transportation coordination best practices, and involvement from all CCAM agencies will enable the CCAM to jointly communicate with prospective and current grantees. Multiagency involvement would further ensure the unique requirements of each Federal agency are understood and incorporated within the Center. CMCOs will lead and coordinate their agency's involvement in the CCAM Technical Assistance Center.

Additionally, per **Challenge 3: Identifying Progress in Coordination**, agencies would describe their progress in coordinating transportation. For agencies that currently collect transportation-related data from grantees, the annual report could include an evaluation of that year's data. All agencies could include descriptions of their CMCO's engagement in the CCAM, staff-level efforts to improve State and local transportation coordination, transportation coordination best practices, Federal coordination on notices of funding opportunity (NOFO) to encourage transportation coordination, and examples of transportation coordination by current grantees. Some agency reports may be shorter than others due to fewer opportunities to coordinate transportation between their programs. The CMCOs will consolidate these reports and use them to help determine next steps for the Council.

3.4 Cost-Sharing Policy and Allocated Cost Model

The Council shall...

- C. address any outstanding recommendations made by the Council in the 2005 Report to the President relating to the implementation of Executive Order No. 13330, including—
 - i. a cost-sharing policy endorsed by the Council; and
 - ii. recommendations to increase participation by recipients of Federal grants in locally developed, coordinated planning processes; and
- D. to the extent feasible, addresses recommendations by the Comptroller General concerning local coordination of transportation services.

—FAST Act Section 3006(c)(2)

The FAST Act contains several nested requirements that direct the CCAM to create a cost-sharing policy. It requires the CCAM to address any outstanding recommendations made in the 2005 Report to the President or made by the GAO. Together, these recommendations instruct the CCAM to create a cost-sharing policy that addresses NEMT and is endorsed by the CCAM. Additionally, the FAST Act instructs the CCAM to consider two additional components:

In establishing the cost sharing policy required under paragraph (2), the Council may consider, to the extent practicable—

- A. the development of recommended strategies for grantees of programs funded by members of the Council, including strategies for grantees of programs that fund nonemergency medical transportation, to use the cost sharing policy in a manner that does not violate applicable Federal laws; and
- B. incorporation of an allocated cost model to facilitate local coordination efforts that comply with applicable requirements of programs funded by members of the Council, such as—
 - i. eligibility requirements;
 - ii. service delivery requirements; and
 - iii. reimbursement requirements.

—FAST Act Section 3006(c)(3)

In order to address the combined requirements of the 2005 Report to the President, the GAO, and the FAST Act, the CCAM has established the CCAM Cost-Sharing Policy Statement that addresses NEMT and has made progress toward developing an allocated cost model. The CCAM also identifies three challenges that if addressed, would enable further cost sharing.

3.4.1 Cost-Sharing Policy

The CCAM endorsed and adopted in June 2020 the **CCAM Cost-Sharing Policy Statement**, which addresses both the Federal fund braiding and vehicle- and ride-sharing elements of cost sharing. To address both elements and the combined FAST Act requirement, the endorsed statement contains principles, strategies, and tools to enable cost-sharing.

The **CCAM Cost-Sharing Policy Statement** is available in item 1 in the **Appendix**.

Definition: Cost Sharing
Cost sharing occurs when partners share common costs of a transportation service or a transportation project in a manner that is based equitably on the benefit received. Cost-sharing arrangements include both Federal fund braiding for local match as well as vehicle and ride sharing across Federal programs.

CMS Assistance to Clarify Medicaid NEMT Cost-Sharing Abilities

During the development process for the CCAM Cost-Sharing Policy Statement, the CCAM noted that some CCAM stakeholders, including State Medicaid agencies, may benefit from technical assistance regarding existing CMS policies around cost sharing.

Addressing Challenges to Improve Transportation Cost-Sharing

Additionally, the CCAM outlines three challenges that if addressed, would increase State and local transportation cost sharing:

- **Challenge 7: Recipients Are Not Enabled to Braid Federal Funds, Even When Not Expressly Prohibited**
- **Challenge 8: Reporting Requirements for Jointly Funded Projects Are Complicated and Not Standardized**
- **Challenge 12: VTS Is Not Expressly Allowed to Share Costs of Transportation and Transport Other Federal Program Beneficiaries**

3.4.2 Allocated Cost Model

The term “allocated cost model” means a method of determining the cost of trips by allocating the cost to each trip purpose served by a transportation provider in a manner that is proportional to the level of transportation service that the transportation provider delivers for each trip purpose, to the extent permitted by applicable Federal laws.

—FAST Act Section 3006(c)(1)

In recognition of the utility of an allocated cost model, DOT—on behalf of the CCAM—has advanced two separate allocated cost model technologies: the Cost Allocation Technology for Nonemergency Medical Transportation and the Two-Variable Cost Allocation Calculator. Additionally, the VA has developed two VA-specific technologies that could be expanded to

other CCAM agencies if the VA had the authority to share vehicles with other Federal agencies' beneficiaries: the VA Beneficiary Travel Self-Service System (BTSSS) and the VA VetRide Technology.

Cost-Allocation Technology for Nonemergency Medical Transportation

In fall 2019, on behalf of the CCAM, DOT began efforts to develop a cost-allocation technology for NEMT that would enable States, public transit authorities, nonprofit agencies, and private, for-profit NEMT providers to determine the fully allocated cost of individual and shared NEMT trips. This model differs from other existing cost models in that it fully incorporates for-profit operators and addresses issues such as depreciation and profit. Additionally, it incorporates validity testing so that financial entries that are out of range of normal NEMT performance are flagged.

This technology directly supplements the CCAM Cost-Sharing Policy Statement and incorporates the same Federal cost-sharing principles.

In addition to incorporating Federal principles, the technology also takes State-specific principles and regulations into consideration. As part of the development of the technology, DOT convened a technical advisory group consisting of State DOT and Medicaid officials in California, Ohio, North Carolina, Vermont, and Washington to discuss State principles and regulations. DOT then piloted the beta version of the technology over a three-month period in mid-eastern Ohio to ensure that the final technology correctly incorporated Federal and State principles and regulatory considerations.

The resulting technology is an open-source program, which will allow States and local communities to customize it even further, as needed. Transportation providers input their line item expenses into the program and the technology uses these inputs to determine the fully allocated cost of individual and shared rides.

The technology is anticipated to be available on the CCAM website in 2021.

Two-Variable Cost Allocation Calculator

The National Rural Transit Assistance Program (National RTAP), an FTA-funded technical assistance center, developed the Two-Variable Cost Allocation Calculator to enable communities to produce more accurate and detailed expense data, understand the costs of different services for managing Federal and State grants, and price and plan for new services. The calculator determines the fully allocated cost for providing services by travel mode, jurisdiction, service type, individual route/service, and sponsored services (if applicable). In particular, the calculator allows for shared ride demand response service to be sub-allocated to different trip sponsors.

In March 2020, National RTAP and NCMM hosted a joint webinar to explain the functionality of the Two-Variable Cost Allocation Calculator to transit agencies and other entities.⁷ The

⁷ "Cost Allocation Webinar." National Rural Transit Assistance Program. 2020. http://nationalrtap.org/images/Cost_Allocation_Webinar_Slides_3-25-20.pdf.

webinar detailed ways transportation providers may utilize results from the calculator for data reporting, pricing, and planning of services.

The Two-Variable Cost Allocation Calculator is available on the National RTAP website in both Microsoft Excel and Microsoft Access applications.⁸

VA Beneficiary Travel Self-Service System

BTSSS is an advanced electronic claims processing system specific to the VA's Beneficiary Travel program that permits Veterans to file claims electronically for mileage reimbursement from their smartphones, tablets, or computers. BTSSS verifies Veteran eligibility and the appointment for which the Veteran is claiming mileage reimbursement, calculates the amount of reimbursement due, and approves or rejects payment. If approved, BTSSS notifies the VA Financial Service Center to direct deposit the reimbursement amount. If the claim is rejected, BTSSS notifies the Veteran and informs them of any needed additional information if applicable.

In the future, BTSSS's reimbursement calculation function could be expanded to other CCAM agency programs. Though few other CCAM agency programs provide reimbursement to beneficiaries for transportation costs, BTSSS could be expanded to calculate the cost of a trip for other agencies, which may complement future cost-allocation efforts.

VA VetRide Technology

VetRide is a platform specific to the VA's Veterans Transportation Service (VTS) that manages Veterans' trip requests to and from VA healthcare facilities and authorized non-VA healthcare appointments. Veterans access self-service portals online via their smartphone, tablet, or computer to schedule their rides. Additionally, VetRide provides sophisticated reporting for the VA.

VetRide also connects to drivers' tablets on board VTS vehicles to ensure Veterans' trips are as seamless possible. These multifunctional tablets provide GPS directional navigation, electronic trip manifests and messaging with the dispatcher, and track passenger trips and associated clinic appointments for which the Veteran is being transported.

Currently, VTS may only provide rides to Veterans and their authorized caregivers. The VetRide platform could be expanded in the future to other CCAM agency programs' beneficiaries if VTS had the ability to participate in vehicle and ride sharing with other CCAM agencies. This could greatly increase the efficiency of NEMT services across the country.

⁸ "Two-Variable Cost Allocation Calculator." National Rural Transit Assistance Program. 2019. <https://www.nationalrtap.org/Web-Apps/Cost-Allocation-Calculator>.

3.5 Outstanding Recommendations from 2005 Report to the President

The Council shall...

- C. address any outstanding recommendations made by the Council in the 2005 Report to the President relating to the implementation of Executive Order No. 13330, including—
 - i. a cost-sharing policy endorsed by the Council; and
 - ii. recommendations to increase participation by recipients of Federal grants in locally developed, coordinated planning processes.

—FAST Act Section 3006(c)(2)

In 2005, the CCAM produced the Report to the President on Human Service Transportation Coordination, as required by Executive Order 13330. The report provided recommendations to advance the streamlining and innovations of transportation coordination. The 2005 Report to the President recommended that the CCAM:

1. Seek mechanisms to require participation in a **community transportation planning** process for human service transportation programs.
2. Promote **vehicle sharing** with recipients and sub-recipients of other Federal programs by reviewing and modifying Federal agency policies and procedures.
3. Create and endorse standard **cost allocation** principles.
4. Develop a method of **reporting and evaluation** to permit cross agency analysis towards improved coordination of transportation programs.
5. Pilot 10 to 12 **demonstration projects** in order to test the feasibility and cost-effectiveness of new approaches to transportation coordination efforts.

The CCAM has since worked to address each of these recommendations in support of the mission and vision of the Council. The progress on each recommendation is detailed below.

3.5.1 Coordinated Transportation Planning

In order to effectively promote the development and delivery of coordinated transportation services, the CCAM recommends that the Administration seek mechanisms (statutory, regulatory, or administrative) to require participation in a community transportation planning process for human service transportation programs.

—2005 Report to the President

Transportation coordination is the foundation of the CCAM and the driver to achieve the goals outlined in Executive Order 13330. The CCAM collaborates both among CCAM agencies and with federally assisted grantees to improve coordination opportunities that address the needs of transportation-disadvantaged populations. Fundamental to the delivery of coordinated transportation are community transportation planning processes, which often take the form of

locally developed, coordinated public transit-human services transportation plans (“coordinated plans”) that unite stakeholders with diverse interests.

To address this recommendation, the CCAM adopted in 2006 the following coordinated transportation policy statement:

Member agencies of the Federal Coordinating Council on Access and Mobility resolve that federally assisted grantees that have significant involvement in providing resources and engage in transportation delivery should participate in a local coordinated human services transportation planning process and develop plans to achieve the objectives to reduce duplication, increase service efficiency and expand access for the transportation-disadvantaged populations as stated in Executive Order 13330.

—Coordinated Human Service Transportation Planning Final Policy Statement

The CCAM continues to publish resources and information to further local coordination, including participation in coordinated plans. The CCAM **Program Inventory**, published in 2019, is a resource that details information on all 130 currently identified Federal grant programs that may fund human service transportation, including populations served, types of transportation projects funded, and local plan requirements. The **Federal Fund Braiding Guide**, published in 2020, is a guide that explains Federal fund braiding for local match and lists program-by-program determinations on Federal fund braiding eligibility. CCAM agency grantees can use the Program Inventory and Federal Fund Braiding Guide to find opportunities to coordinate locally, including in coordinated plans.

Spotlight: Collaboration in Crisis

The water crisis in Flint, MI served as a catalyst for the development and expansion of Flint's Mass Transportation Authority's (MTA) Rides to Wellness service in 2016. Residents needed a way to obtain bottled water, access medical clinics, and access grocery stores with fresh fruits and vegetables—all of which would limit health consequences from lead exposure. The Michigan Department of Health and Human Services approached MTA to provide needed transportation services to these destinations. MTA responded by quickly expanding its previously dialysis-centered Rides to Wellness service and modeling it after transportation network companies to respond in real time to ride requests. This expansion in service greatly increased local transportation coordination and helped prompt other local government agencies and hospitals to participate in the MTA's Rides to Wellness service.

Today, many coordinated plans are developed as part of the requirement of FTA’s Enhanced Mobility of Seniors and Individuals with Disabilities program. These coordinated plans detail the transportation needs of people with disabilities, older adults, and individuals of low income in local communities using various tools including community planning sessions, self-assessment tools, focus groups, surveys, and detailed studies and analyses. Emergency preparedness and response may also be a future focus of coordinated plans as transit agencies across the country grapple with the coronavirus disease 2019 (COVID-19) and prepare to respond to future emergencies. FTA allows significant flexibility in developing plans for human service transportation, such as permitting the lead agency for the coordinated planning process to be different from the designated recipient for the Enhanced Mobility of Seniors and Individuals

with Disabilities program. Other Federal programs, such as FTA's Urbanized Area Formula Funding program and the Formula Grants for Rural Areas program encourage grantees to develop coordinated plans.

Despite the CCAM's strides to improve access to information on local coordination opportunities, many local human service agencies and public transit agencies do not fully coordinate transportation. In the 2018 State and local focus groups, several transit organizations reported this as a significant barrier to transportation coordination. In order to address this barrier, the CCAM has identified **Challenge 4: Participation in Local Coordinated Transportation Planning Is Not Always Incentivized** to reduce duplicative transportation efforts and increase the efficiency of transportation projects.

3.5.2 Vehicle Sharing

In order to reduce duplicate transportation services as well as idle time for drivers and vehicles, the CCAM recommends that vehicles used in human service transportation be made available to other federally funded programs, consistent with the Common Grant Rule (OMB Circular A-102). Within the next year, each Federal agency should review and modify their policies and procedures to proactively promote the sharing of vehicles with recipients and sub-recipients of other Federal programs.

—2005 Report to the President

Vehicle sharing is a resource sharing strategy in which one entity provides transportation for clients of multiple programs to use the vehicles. Federal vehicle sharing broadens the spectrum of transportation options available to targeted populations; eliminates unnecessary spending caused by duplicated efforts; and expands access to transportation-disadvantaged communities.

In 2006, the CCAM developed the following vehicle resource sharing policy statement with the intent of increasing availability, enhancing efficiency, and improving accessibility of transportation:

Member agencies of the Federal Coordinating Council on Access and Mobility resolve that federally assisted grantees that have significant involvement in providing resources and engage in transportation should coordinate their resources in order to maximize accessibility and availability of transportation services.

—Vehicle Resource Sharing Final Policy Statement

This indicates that Federal cost principles do not restrict grantees to solely serve their own clients, which in turn, would increase availability of transportation options. This policy statement also enables and encourages sharing of grantee-owned vehicles, if the cost of providing transportation to the community is also shared. Coordinating vehicle use would enhance transportation service efficiency by reducing the amount of time that vehicles are idle and the duplication of routes and services in communities.

The CCAM's 2017 Vehicle Sharing Policy Work Group built on the 2006 policy statement to identify applicable barriers to implementing the policy. **Challenge 5: Vehicle Sharing Is Not Expressly Allowed**, discusses these barriers and notes an improvement that would encourage coordination of Federal funding recipients to share vehicles or fund vehicles with one or more Federal funding source. The CCAM identified two additional related challenges: **Challenge 10: Flexible Service Boundaries for Enhanced Mobility of Seniors and Individuals with Disabilities Program Is Not Expressly Allowed** and **Challenge 11: Incidental Use Is Not Expressly Allowed** to further increase opportunities for vehicle sharing.

3.5.3 Cost Allocation

In order to ensure that adequate resources are available for transportation services for people with disabilities, older adults and individuals with lower incomes, and to encourage the shared use of vehicles and existing public transportation services, the CCAM recommends where statutorily permitted that standard cost allocation principles for transportation be developed and endorsed by Federal human service and transportation agencies.

—2005 Report to the President

Cost allocation is a financial planning method used to assign costs to one or more parties proportional to the benefit received. The Federal Government does not currently use cost allocation to coordinate transportation. A set of Federal transportation cost-allocation principles realizes several benefits, including:

- Encouragement of States and local communities to share vehicles and rides;
- Improvement of the efficiency of Federal, State and local funds;
- Clarification for grantees of how to handle situations in which individuals qualify for transportation services through multiple programs (e.g., Medicaid, aging, employment, etc.); and
- Clarification for grantees of how to ensure the full cost of transportation services is accounted for, especially regarding the costs borne by local transit providers.

See **3.4 Cost-Sharing Policy and Allocated Cost Model** for details on the CCAM's efforts around cost sharing and cost allocation.

3.5.4 Reporting and Evaluation

The Council recommends the development of a method to permit cross-agency analysis of the effectiveness, efficiency, and progress of States, communities, and tribes toward improved coordination of transportation programs, as evidenced by improvements in the overall quality and cost-effectiveness of human service transportation.

—2005 Report to the President

Reporting and evaluating Federal transportation programs enable the CCAM to measure the progress of transportation coordination efforts towards achieving objectives outlined in the Strategic Plan. There are opportunities to gather data on the cost and quality of transportation services provided by programs that deliver a variety of services, such as job training, healthcare, education, and social services.

In developing the Program Inventory, the CCAM faced difficulties in collecting uniform transportation data. For example, 80 percent of programs in the Program Inventory did not track the amount spent annually on transportation. In order to improve reporting and evaluation, the CCAM has identified **Challenge 3: Identifying Progress in Coordination** and **Challenge 6: Need for Transportation Data Collection Guidance**. Consistently reporting specific transportation data and tracking transportation coordination metrics will allow the CCAM to better monitor trends in transportation coordination efforts; establish benchmarks to inform future coordination; and make data-driven recommendations and improvements to transportation coordination.

Examples of potential performance measures to collect may include:

- Transportation spending, such as cost per trip and cost per mile;
- Cost avoidance/savings realized through vehicle and ride sharing;
- Amount and demographics of people served;
- Trip travel time; and
- Customer satisfaction with transportation services.

As CCAM agencies determine what transportation data to collect, they will carefully consider the potential reporting burden placed on transportation grantees.

3.5.5 Demonstration Projects

In order to test the feasibility and cost-effectiveness of a new approach to meeting the full range of transportation needs of persons with disabilities, older adults and individuals with lower incomes, the CCAM recommends that statutory authority be sought to permit the development of 10 to 12 demonstration projects in metropolitan, rural and/or Tribal areas. In these demonstration projects, a single transportation system (not necessarily a single provider) financed through a consolidated federally funded stream would meet the total needs of transportation-disadvantaged populations.

—2005 Report to the President

Innovation in transportation coordination may lead to reduced duplication of Federal resources and the improved efficiency and quality of services provided to underserved populations. Demonstrating, or piloting, new transportation coordination programs encourages Federal agencies and transportation service providers to leverage and scale new developments and improvements in transportation coordination. Focusing these programs in rural and small urban areas allows these entities to better understand and address the specific needs of underserved populations.

The CCAM strives to test new and innovative methods of coordinating human service transportation. This approach has enabled the CCAM to support projects that meet a range of human service transportation needs of people with disabilities, older adults, and individuals of low income. In the past decade, these efforts have consisted of three pilot programs: the **Mobility Services for All Americans (MSAA) initiative**, the **Veterans Transportation Community Living Initiative (VTCLI)**, and the **Pilot Program Projects**.

- **MSAA:** In 2005, the CCAM launched the MSAA initiative to improve transportation services and simplify access to employment, healthcare, education, and other community activities by using advanced Intelligent Transportation Systems technology. MSAA promoted coordination of community mobility resources in the form of Travel Management Coordination Centers. The program underwent three phases, funding 11 regional projects with a total of \$7.3 million over the span of the initiative.

Project Spotlight: Via Mobility Services, Denver, CO

Via Mobility Services is a private, nonprofit organization that provides on-demand paratransit services, travel training, and mobility options information and referral for people living with mobility challenges in 19 communities across five counties in Colorado.⁹ Via **received \$240,000 through the MSAA initiative in 2015**, which allowed the organization to expand its Longmont coordination program to other communities. Via partnered with the Denver Regional Mobility and Access Council and the Seniors' Resource Center to allow agencies in the region to use a coordinated system to book rides and transfers for customers across service areas, which improved the customer experience and minimized the duplication of transportation service.

⁹ "Via Mobility Homepage." Via Mobility. 2020. <https://viacolorado.org/>.

- **VTCLI:** In 2011, the CCAM launched the VTCLI to help Veterans, military families, and others connect to jobs and services in their communities by improving access to local transportation. The FTA awarded 119 grants totaling \$64 million over two years.¹⁰

Project Spotlight: LinkforCare Website, Kansas City, MO

The Kansas City Veterans Affairs Medical Center (VAMC) and the Mid-America Regional Council (MARC) collaboratively developed the Kansas City LinkforCare website.¹¹ The LinkforCare website is a one-stop transportation information resource, funded by a **\$50,000 VTCLI grant in 2012**, for caregivers, healthcare professionals, social workers, discharge planners, mental health professionals, and individuals needing personal assistance, including Veterans. This project sparked impactful local collaboration: The VAMC became more familiar with the Kansas City Area Transportation Authority's (KCATA) transit offerings, including Americans with Disabilities Act (ADA) paratransit. The VAMC and KCATA jointly determined which Veterans qualified to ride ADA paratransit service and KCATA billed the Kansas City VAMC for these services, alleviating the financial burden on Veterans to front the cost of their NEMT and wait for reimbursement through the VA's Beneficiary Travel program. This program, in conjunction with ADA transportation, resulted in a nearly ten percent reduction in missed healthcare appointments. The partnership continues: In 2017, KCATA, in partnership with the Kansas City Veterans Administration and the Veterans Community Project, launched a free fare program for Veterans in honor of their service.¹² The program allows all area Veterans to use fixed-route bus service for free with a RideKC Veterans Pass.

- **Pilot Program Projects:** In 2016, the FTA launched the Pilot Program Projects which is detailed in **2.2.1 Pilot Program Grants**.

3.6 Outstanding GAO Recommendations

The Council shall...

- D. to the extent feasible, address recommendations by the Comptroller General concerning local coordination of transportation services.

—FAST Act Section 3006(c)(2)

In December 2014, the Comptroller General and the GAO issued two reports that contained a total of four recommendations for the CCAM to address. One report focused on NEMT¹³ and the other on measuring transportation coordination data.¹⁴ These recommendations are as follows:

¹⁰ "VTCLI – Grantee Resources." Federal Transit Administration. 2016.

<https://www.transit.dot.gov/funding/grant-programs/veterans-transportation/vtcli-%E2%80%93-grantee-resources>.

¹¹ "Link for Care Homepage." University of Kansas Medical Center. 2020. <https://www.linkforcare.org/>.

¹² "Veterans Ride Free with RideKC Veterans Pass." RideKC Kansas City Regional Transit. 2017. <https://ridekc.org/fares/veterans-pass>.

¹³ "Transportation Disadvantaged Populations: Nonemergency Medical Transportation Not Well Coordinated, and Additional Federal Leadership Needed (Report GAO-15-110)." U.S. Government Accountability Office. 2014. <https://www.gao.gov/assets/670/667362.pdf>.

¹⁴ "Transportation for Older Adults: Measuring Results Could Help Determine If Coordination Efforts Improve Mobility (Report GAO-15-158)." U.S. Government Accountability Office. 2014. <https://www.gao.gov/assets/670/667375.pdf>.

1. **Publish a strategic plan** that outlines a strategy for coordinating NEMT;
2. **Publish a cost-sharing policy** and identify how it applies to programs that fund NEMT;
3. Promote NEMT coordination by **identifying challenges associated with coordinating NEMT** and developing recommendations on how to address them; and
4. **Define and report on desired outcomes** and collect data to track and measure results.

Since 2014, the CCAM has made notable progress in addressing these four recommendations, as detailed below.

3.6.1 Strategic Plan

To promote and enhance federal, state, and local NEMT coordination activities, the Secretary of Transportation, as the chair of the Coordinating Council, should convene a meeting of the member agencies of the Coordinating Council and complete and publish a new or updated strategic plan that, among other things, clearly outlines a strategy for addressing NEMT and how it can be coordinated across federal agencies that fund NEMT service.

—GAO Report GAO-15-110

The 2019–2022 CCAM Strategic Plan, adopted at the October 2019 CCAM meeting and detailed in **3.1 Strategic Plan**, addresses the GAO’s recommendation that the CCAM convene and publish a new strategic plan. The goals and objectives in the Strategic Plan apply to all Federal transportation coordination efforts, including NEMT.

3.6.2 Cost-Sharing Policy

To promote and enhance federal, state, and local NEMT coordination activities, the Secretary of Transportation, as the chair of the Coordinating Council, should convene a meeting of the member agencies of the Coordinating Council and finalize and issue a cost-sharing policy and clearly identify how it can be applied to programs under the purview of member agencies of the Coordinating Council that provide funding for NEMT.

—GAO Report GAO-15-110

The CCAM Cost-Sharing Policy Statement, detailed in **3.4 Cost-Sharing Policy and Allocated Cost Model**, addresses the GAO’s recommendation that the CCAM create a cost-sharing policy. The CCAM Cost-Sharing Policy Statement specifically addresses how it applies to CMS and VA programs, as they are the largest Federal funders of NEMT.

3.6.3 NEMT Coordination

To promote and enhance federal, state, and local NEMT coordination activities, the Secretary of Transportation, as the chair of the Coordinating Council, should convene a meeting of the member agencies of the Coordinating Council and using the on-going work of the Health, Wellness, and Transportation working group and other appropriate resources, (1) identify the challenges associated with coordinating Medicaid and VA NEMT programs with other federal programs that fund NEMT, (2) develop recommendations for how these challenges can be addressed while still maintaining program integrity and fraud prevention, and (3) report these recommendations to appropriate committees of Congress. To the extent feasible, the Coordinating Council should implement those recommendations that are within its legal authority.

—GAO Report GAO-15-110

The CCAM participated in two main activities to enhance Federal, State, and local NEMT coordination:

1. Convened 2018 State and local focus groups, and
2. Developed CCAM Cost-Sharing Policy Statement that addresses NEMT.

The CCAM interviewed NEMT stakeholders as part of the 2018 State and local focus groups to identify their greatest barriers to NEMT transportation coordination. The focus groups hosted a broad representation of participating NEMT stakeholders, including those from State Medicaid agencies, physical and behavioral health services, and Veterans transportation services. These stakeholders identified several challenges and barriers to coordinating NEMT across Federal programs. See **2.2.4 State and Local Focus Groups** for the ten greatest barriers to coordinating NEMT. More information on identified barriers is available in the **2018 State and Local Focus Group Report**, available in item 9 in the **Appendix**.

Informed by the results of the State and local focus groups, the CCAM convened CMS and VA to develop CCAM Cost-Sharing Policy Statement that has a focus on NEMT coordination. Through several working group sessions and individual meetings led by DOT, the Council identified additional challenges associated with coordinating Medicaid and VA NEMT programs. These challenges are mainly associated with program regulations that restrict vehicle and ride sharing.

While there is only one NEMT challenge (Challenge 12) in this report, the CCAM has identified two additional challenges which have implications on NEMT coordination. The following three challenges have implications on NEMT coordination:

- **Challenge 6: Need for Transportation Data Collection Guidance**
- **Challenge 8: Reporting Requirements for Jointly Funded Projects Are Complicated and Not Standardized**
- **Challenge 12: VTS Is Not Expressly Allowed to Share Costs of Transportation and Transport Other Federal Program Beneficiaries**

3.6.4 Report on Desired Outcomes

To promote and enhance federal, state, and local coordination activities, the Secretary of Transportation, as the chair of the Coordinating Council, should convene a meeting of the member agencies of the Coordinating Council and define and report on desired outcomes and collect related data to track and measure progress in achieving results, including the extent of coordination efforts that are under way, such as improved services for older adults. This effort could be conducted as a part of the Coordinating Council's process to update its strategic plan, which we have also recommended in a concurrent report.

—GAO Report GAO-15-158

As previously discussed, the CCAM adopted its 2019–2022 Strategic Plan on October 29, 2019, which contains four strategic goals and supporting objectives. The CCAM reports on its collective and individual agency progress on these goals through the **CCAM Summary of Activities**, which is posted quarterly to the CCAM website.¹⁵ The CCAM will continue to report on its progress toward implementing the 2019–2022 Strategic Plan.

3.7 Examine and Propose Changes to Federal Regulations and Federal Laws

The Council shall...

- E. examine and propose changes to Federal regulations that will eliminate Federal barriers to local transportation coordination, including non-emergency medical transportation; and
- F. recommend to Congress changes to Federal laws, including chapter 7 of title 42, United States Code, that will eliminate Federal barriers to local transportation coordination, including nonemergency medical transportation.

—FAST Act Section 3006(c)(2)

The CCAM is not proposing changes to Federal regulations or laws at this time. If, in the future, the Administration determines a need for statutory change in the authorities affecting CCAM activities or transportation coordination, the CCAM will so advise Congress.

¹⁵ “CCAM Summary of Activities.” Coordinating Council on Access and Mobility. 2020. <https://www.transit.dot.gov/regulations-and-guidance/ccam/about/ccam-summary-activities>.

4.0 Report to the President

The Council shall, concurrently with submission to the President of a report containing final recommendations of the Council, transmit such report to the Committee on Transportation and Infrastructure of the House of Representatives and the Committee on Banking, Housing, and Urban Affairs of the Senate.

–FAST Act Section 3006(c)(4)

This report contains the challenges that the Council has identified that, if addressed, would eliminate Federal barriers to State and local transportation coordination. It will be submitted to the President.

4.1 Eliminating Federal Barriers to Local Transportation Coordination

As noted in **2.0 CCAM Background**, the CCAM has undertaken substantial effort to address its statutory requirements, including the outstanding recommendations from the 2005 Report to the President and from the GAO. For example, the CCAM adopted a new strategic plan to guide Council and individual agency-level activities; identified perceived barriers to local transportation coordination through the 2018 State and local focus groups and the National Center for Mobility Management (NCMM) survey; and conducted Federal working sessions to begin to address the perceived barriers. The CCAM continues to produce resources, such as the CCAM Program Inventory and the Federal Fund Braiding Guide, that educate and encourage Federal recipients of CCAM agency funds to coordinate their transportation efforts.

Despite this work, there are still opportunities for the CCAM to improve the Nation’s coordination of transportation for people with disabilities, older adults, and individuals of low income. To address these difficulties, the CCAM has identified a total of 12 challenges and their impacts on local transportation coordination.

These challenges are divided by whether they impact **CCAM agency engagement**, or **barriers to State and local transportation coordination**. Within both categories, challenges are further divided by whether they apply broadly to transportation coordination (**global challenges**) or are specific to NEMT coordination (**NEMT challenges**). **Figure 13** displays the number of challenges the CCAM identifies within each of these categories.

Figure 13: CCAM Challenges by Category

Challenges Category	Number of Challenges
CCAM Engagement Challenges	3
Global Challenges	3
State and Local Barrier Challenges	9
Global Challenges	8
NEMT Challenges	1
TOTAL CHALLENGES	12

4.1.1 CCAM Engagement Challenges

The CCAM has identified three global engagement challenges. Addressing these challenges would enable the CCAM to further reduce Federal barriers to State and local transportation coordination.

Global Challenges

Challenge 1: Further Improving Coordination Amongst CCAM Partners

Barrier: Although CCAM agencies have worked successfully together to make substantial progress in coordination, transportation coordination responsibilities are diffuse across CCAM agencies, which may limit further progress.

Improvement: CCAM agencies could appoint a designated Chief Mobility Coordination Officer (CMCO) to help coordinate their agency's involvement in the CCAM and other non-transportation related responsibilities within their agency. By designating a senior official with a prioritized focus on transportation coordination within each CCAM agency, the CCAM will be better equipped to make progress on high impact initiatives.

This challenge relates to goal 3, objectives 1 and 2 of the CCAM 2019–2022 Strategic Plan.

Challenge 2: Improving Technical Assistance Delivery

Barrier: States and local communities need joint Federal guidance and information on how to coordinate transportation, including NEMT, and remain compliant with Federal law. CCAM agencies do not currently have a mechanism to provide joint guidance and face additional difficulties when attempting to share information beyond their immediate agency's network.

Improvement: A single, joint multiagency CCAM Technical Assistance Center would engage the CCAM agencies to develop joint guidance and communications that would enable current and potential grantees to find coordinated Federal information on transportation coordination. This would in turn encourage and increase State and local transportation coordination.

This challenge relates to goal 1, objectives 1, 2, and 3 of the CCAM 2019–2022 Strategic Plan. For more details on this challenge, see 3.3.3 Future Interagency Collaboration Model.

Challenge 3: Identifying Progress in Coordination

Barrier: The CCAM agencies do not evaluate their own progress toward transportation coordination.

Improvement: CCAM agencies that produce an individual annual CCAM agency report would have a focused document that creates accountability at the agency level to participate in the CCAM's transportation coordination efforts. CCAM agencies would also be equipped to showcase their transportation coordination efforts and would be able to better track progress on accomplishing the goals in the 2019–2022 CCAM Strategic Plan.

This challenge relates to goal 3, objectives 1 and 2 of the CCAM 2019–2022 Strategic Plan. For more details on this challenge, see 3.3.3 Future Interagency Collaboration Model and 3.5.4 Reporting and Evaluation.

4.1.2 State and Local Barrier Challenges

Throughout the 2017 interagency work groups, the 2018 State and local focus groups, and the 2018/2019 NCMM survey, the CCAM gathered barriers to State and local transportation coordination. The CCAM had identified the following nine challenges, both global and NEMT-specific, to addressing these barriers and improve State and local transportation coordination.

Global Challenges

Challenge 4: Participation in Local Coordinated Transportation Planning Is Not Always Incentivized

Barrier: Some CCAM programs do not incentivize funding recipients to participate in coordination activities, such as locally developed, coordinated public transit-human services transportation plans. Regional planning is too narrowly focused on transit agencies and often fails to include community organizations that provide medical, housing, employment, and other human services. Though many transit agencies receiving FTA funding are required to include human service agencies in their planning process, human service agencies are not required nor incentivized to participate.

Improvement: CCAM agency grantees would be incentivized to seek collaboration with local partners, reducing duplicative transportation efforts and increasing the efficiency of transportation projects.

This challenge relates to goal 1, objective 2 of the CCAM 2019–2022 Strategic Plan. For more details on this challenge, see 3.5.1 Coordinated Transportation Planning.

Spotlight: New Hampshire State Coordinated Transportation Planning

New Hampshire launched a comprehensive interview and outreach effort to include transit and non-transit stakeholders in the development of its 2016 Statewide Coordination of Community Transportation Services Plan. The State's Department of Transportation, Department of Health and Human Services (including the Bureau of Elderly and Adult Services, the Bureau of Drug and Alcohol Services, and the Division of Children, Youth, and Families), the Council on Developmental Disabilities, the Manchester VA Medical Center, the Statewide Coordinating Council for Community Transportation, as well as members of the public and private enterprise were consulted. The result was an inclusive statewide plan that advanced the availability, accessibility, and efficiency of transportation across New Hampshire.¹⁶

¹⁶ “2016 New Hampshire Statewide Coordination of Community Transportation Services Plan - Final Report.” RLS and Associates. 2017. https://www.nh.gov/dot/programs/scc/documents/nh_final_20170131.pdf.

Challenge 5: Vehicle Sharing Is Not Expressly Allowed

Barrier: Authorizing statutes for some CCAM member agencies do not expressly allow vehicles purchased using program funds to be shared with other Federal funding recipients. Some CCAM agency programs are regulated by strict policies that prevent or discourage funding recipients from sharing vehicles. Grant recipients are therefore unlikely to seek vehicle sharing opportunities if they risk breaching Federal law or guidance.

Improvement: Removing program restrictions and updating program guidance on vehicle sharing policies to expressly allow vehicle sharing would encourage funding recipients to share vehicles and reduce duplicative costs. The CCAM Technical Assistance Center (see **Challenge 2: Improving Technical Assistance Delivery**) would be able to expand the reach of new program guidance by targeting it to CCAM agency stakeholders.

This challenge relates to goal 2, objective 1 of the CCAM 2019–2022 Strategic Plan. For more details on this challenge, see 3.5.2 Vehicle Sharing.

Challenge 6: Need for Transportation Data Collection Guidance

Barrier: Federal programs that may fund transportation do not all require standardized transportation data collection. States and transportation providers need Federal guidance on transportation data collection, including defined indicators to measure social determinants of health. There is no central Federal agency that establishes transportation data collection guidance in consultation with CCAM agencies. Once a data collection standard is developed, Federal agencies would be able to alter program regulations to require Federal fund recipients to collect uniform transportation data. Performance measures for each CCAM agency could then be developed based on the collected data.

Improvement: States and transportation providers would identify, collect, and compare standardized data points, enabling them to determine data-driven best practices, coordination opportunities, and internal performance measures. CCAM agencies would measure progress on existing goals and set new goals based on data received, which would further drive the CCAM's work.

This challenge relates to goal 1, objective 2 of the CCAM 2019–2022 Strategic Plan. For more details on this challenge, see 3.5.4 Reporting and Evaluation and 3.6.3 NEMT Coordination.

Challenge 7: Recipients Are Not Enabled to Braid Federal Funds, Even When Not Expressly Prohibited¹⁷

Barrier: State and local transportation grantees, especially those in rural areas, are often unable to procure required match funds for Federal grants. Recipients of contributions paid by the Federal Government under another CCAM agency award may not be used as local match, even when this is not expressly prohibited by statute. This sometimes results in these grant recipients

¹⁷ Challenge 7 does not apply to Medicaid as Medicaid does not provide direct grant funding, but rather the state Medicaid agency reimburses transportation providers for services furnished to Medicaid beneficiaries.

losing their Federal funding completely, decreasing the availability of vital transportation services in their communities.

Improvement: State and local transportation recipients that may otherwise lose their funding due to the inability to match Federal grants would still be able to receive Federal transportation funds. Transportation coordination would increase at the local level in these communities because of the additional coordination required to braid Federal funds.

This challenge relates to goal 1, objective 2, and goal 2, objectives 1 and 3 of the CCAM 2019–2022 Strategic Plan. For more details on this challenge, see 3.4.1 Cost-Sharing Policy.

Spotlight: The Need for Federal Fund Braiding

In FY2016, FTA awarded the Detroit Department of Transportation a Rides to Wellness grant to increase mobility for older adults, particularly city residents with disabilities and/or lower incomes, to nonemergency medical care. The project proposed using scheduling software to improve efficiency and coordination between transportation and healthcare providers, as well as offer transportation to health/wellness/prevention activities such as recreation centers, parks, and farmers' markets. Even though this project would have offered great benefits to the community, the Detroit Department of Transportation was unable to provide the 20 percent local match, despite trying to obtain a new partner, and the funding lapsed.

Challenge 8: Reporting Requirements for Jointly Funded Projects Are Complicated and Not Standardized

Barrier: Reporting requirements when multiple Federal funding sources fund the same service or project can be complex, both for NEMT and other forms of transportation. States and transportation providers struggle to interpret and follow the reporting requirements across multiple Federal and State funding sources, which discourages interagency or intercommunity transportation coordination efforts and sometimes results in a reduced availability of transportation services.

Improvement: Transportation providers would be able to share vehicles for medical and nonmedical trips without strenuous reporting requirements, increasing the efficiency of Federal and State transportation funds. Communities that struggle to provide the match funds for Federal grants, including rural communities, would be able to braid Federal funds more easily, enabling them to provide transportation that may not have otherwise been provided.

This challenge relates to goal 1, objectives 1 and 2, and goal 2, objectives 1 and 3 of the CCAM 2019–2022 Strategic Plan. For more details on this challenge, see 3.4.1 Cost-Sharing Policy and 3.6.3 NEMT Coordination.

Challenge 9: Legal Use of Federal Funds on Transportation Is Discouraged

Barrier: Although transportation for disadvantaged populations is an eligible expense for 130 currently identified Federal programs, some programs may discourage grantees from using Federal grant funds on transportation even when it is allowable and complies with all laws, regulations, and available guidance. This limits the availability of necessary transportation for transportation-disadvantaged populations and decreases local coordination.

Improvement: More CCAM agency grantees would provide necessary funds for transportation-related projects, creating further opportunities for local coordination and increasing availability of transportation for transportation-disadvantaged populations.

This challenge relates to goal 1, objectives 2 and 3 of the CCAM 2019–2022 Strategic Plan.

Spotlight: Joint HHS/DOT Webinar on Transportation Coordination

On February 13, 2020, HHS and DOT jointly hosted a webinar to highlight HHS programs that may fund transportation and ways that HHS and DOT grantees can coordinate transportation. In the webinar slides, HHS’s Administration for Children and Families stated that it “discourages the use of Child Care and Development Fund (CCDF) funds for costs related to transportation.” This discouragement may reduce the number of communities that use CCDF funds on transportation to support access to child care, which reduces access to this vital human service, even though CCDF program funds may legally be used for such a purpose.

Challenge 10: Flexible Service Boundaries for Enhanced Mobility of Seniors and Individuals with Disabilities Program Is Not Expressly Allowed

Barrier: 49 U.S.C. 5310 does not expressly allow vehicles funded by the Federal Transit Administration’s (FTA) Enhanced Mobility of Seniors and Individuals with Disabilities program to cross rural, small urban, and large urban area boundaries and all such vehicles to be used for trips originating outside of designated service areas. In some communities, local authorities have determined that vehicles funded by the Enhanced Mobility of Seniors and Individuals with Disabilities program may not be used for trips originating outside the service area. This prevents grantees from coordinating with organizations in neighboring jurisdictions and maximizing the efficiency of their vehicles. For example, if a trip originates inside the designated service area and ends outside the designated service area, these communities will not allow the vehicle to begin a new trip until it returns to the designated service area.

Improvement: Making it clear that vehicles funded by the Enhanced Mobility of Seniors and Individuals with Disabilities program are permitted to serve across large urban, small urban, and rural area designations (as long as the area for which the funds are apportioned is also served) would encourage program grantees to coordinate with neighboring jurisdictions. This would improve the efficiency of vehicles and empower communities to serve wider constituencies.

This challenge relates to goal 1, objective 1 of the CCAM 2019–2022 Strategic Plan. For more details on this challenge, see 3.5.2 Vehicle Sharing.

Challenge 11: Incidental Use Is Not Expressly Allowed

Barrier: 49 U.S.C. 5310(b)(7) does not expressly allow greater incidental use of vehicles funded by the FTA’s Enhanced Mobility of Seniors and Individuals with Disabilities program and Formula Grants for Rural Areas program. Because 49 U.S.C. 5310(b)(7) only expressly allows incidental use for meal delivery, the implication for funding recipients is that allowable incidental use is limited to meal delivery alone. Despite FTA guidance, funding recipients have reported confusion on allowable incidental use activities and whether and how they may provide service to other Federal program beneficiaries.

Improvement: Making it clear that public transportation service providers have the ability to provide incidental services would encourage local transportation coordination. This would increase the efficiency of vehicles funded by the Enhanced Mobility of Seniors and Individuals with Disabilities program and the Formula Grants for Rural Areas program.

This challenge relates to goal 1, objectives 1 and 2 of the CCAM 2019–2022 Strategic Plan. For more details on this challenge, see 3.5.2 Vehicle Sharing.

NEMT Challenge

Challenge 12: VTS Is Not Expressly Allowed to Share Costs of Transportation and Transport Other Federal Program Beneficiaries

Barrier: 38 U.S.C. 111A does not expressly allow the Veterans Transportation Service (VTS) program to share transportation costs with other Federal agencies when VTS beneficiaries share rides with other Federal program beneficiaries. Additionally, the authorizing legislation for VA does not expressly allow VA to transport other Federal program beneficiaries on VTS-operated vehicles to non-VA facilities. VTS program restrictions limit VA to only provide rides by VTS-paid employee drivers and only to and from VA facilities and authorized community care facilities. The VTS program is also restricted to providing transports only to VTS beneficiaries. This prevents opportunities for States and local communities to coordinate transportation with VTS.

Improvement: Making it clear that VA has the ability to share transportation costs with other Federal agencies when VTS-funded vehicles transport other Federal program beneficiaries and when other organizations and Federal agency programs use their vehicles to transport VTS beneficiaries would create cost savings for VTS and other Federal agency programs, as well as States and local communities.

This challenge relates to goal 1, objective 1, and goal 2, objective 1 of the CCAM 2019–2022 Strategic Plan. For more details on this challenge, see 3.4.1 Cost-Sharing Policy and 3.6.3 NEMT Coordination.

5.0 Conclusion and Next Steps

DOT remains committed to achieving the goals set forth by the strategic plan. DOT and the other CCAM agencies have worked closely together to further coordinate Federal transportation-related programs that serve people with disabilities, older adults, and individuals of low income. The Council has focused its work over the last five years to address the specific requirements laid out in the FAST Act. Specifically, the CCAM has:

- Identified **challenges** that if addressed, will eliminate barriers to local transportation coordination;
- Published a **strategic plan**;
- Outlined the **roles and responsibilities** of each CCAM agency with respect to local transportation coordination;
- Identify a strategy to strengthen **interagency collaboration**;
- Developed a **cost-sharing policy statement** in compliance with applicable Federal laws;
- Addressed outstanding recommendations made by the Council in the **2005 Report to the President**;
- Addressed outstanding recommendations made by the **Comptroller General**; and
- Submitted a **report** to the President.

Although the CCAM has made notable progress meeting the FAST Act requirements and encouraging State and local transportation coordination, the CCAM acknowledges the need for continued progress on transportation coordination.

Over the next two years, the CCAM will continue to implement its **2019–2022 Strategic Plan: Mobility for All**. Specifically, the Council will focus on the four strategic goals within the plan:

1. Improve access to community through transportation;
2. Enhance cost-effectiveness of coordinated transportation;
3. Strengthen interagency partnerships and collaboration with State, local, and industry groups; and
4. Demonstrate innovative coordination transportation.

The CCAM will continue to advance these strategic goals and draw attention to the need to address the 12 challenges laid out in this report. Addressing these challenges will increase the accessibility, availability, and efficiency of State and local transportation.

The CCAM is committed to enhancing access to and coordination of transportation for people with disabilities, older adults, and individuals of low income, and looks forward to continuing to work towards its goal of **Mobility for All**.

Acronyms

ACL	Administration for Community Living
Agency POC	Agency point of contact
ADA	Americans with Disabilities Act
BTSSS	Beneficiary Travel Self-Service System
CCAM	Coordinating Council on Access and Mobility
CCDF	Child Care and Development Fund
CMCO	Chief Mobility Coordination Officer
CMS	Centers for Medicare and Medicaid Services
DOI	U.S. Department of the Interior
DOJ	U.S. Department of Justice
DOL	U.S. Department of Labor
DOT	U.S. Department of Transportation
ED	U.S. Department of Education
FAST Act	Fixing America’s Surface Transportation Act
FTA	Federal Transit Administration
GAO	U.S. Government Accountability Office
HHS	U.S. Department of Health and Human Services
HUD	U.S. Department of Housing and Urban Development
MAP-21	Moving Ahead for Progress in the 21 st Century
MTA Flint	Mass Transportation Authority in Flint
MSAA	Mobility Services for All Americans
National RTAP	National Rural Transit Assistance Program
NCD	National Council on Disability
NCMM	National Center for Mobility Management
NEMT	Nonemergency Medical Transportation
NOFO	Notice of Funding Opportunity
OMB	Office of Management and Budget
SAFETEA-LU	Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users

SSA	U.S. Social Security Administration
TEA-21	Transportation Equity Act for the 21 st Century
USDA	U.S. Department of Agriculture
VA	U.S. Department of Veterans Affairs
VAMC	Veterans Affairs Medical Center
VTCLI	Veterans Transportation and Community Living Initiative

Glossary

Accessibility	In the context of the goals of the CCAM, increased accessibility is an increase in transportation options that results from coordination among funding recipients.
Allocated cost model	An allocated cost model is a method of determining the cost of trips by allocating the cost to each trip purpose served by a transportation provider in a manner that is proportional to the level of transportation service that the transportation provider delivers for each trip purpose, to the extent permitted by applicable Federal laws.
Americans with Disabilities Act (ADA)	The Americans with Disabilities Act (ADA) is one of America's most comprehensive pieces of civil rights legislation that prohibits discrimination and guarantees that people with disabilities have the same opportunities as everyone else to participate in the mainstream of American life—to enjoy employment opportunities, to purchase goods and services, and to participate in State and local government programs and services. (Source: U.S. Department of Justice)
Availability	In the context of the goals of the CCAM, increased availability is an expansion of transportation service that allows funding recipients to serve more people and regions.
Barrier to transportation coordination	A barrier to transportation coordination is a factor that prevents or hinders organizing and synchronizing, where appropriate, human service transportation.
Beneficiary	A beneficiary is a person who receives benefit from a federally funded program or service. For the CCAM, targeted beneficiaries primarily include people with disabilities, older adults, and individuals of low income.
Broker	A broker contracts with a human service organization to manage transportation services for the organization's beneficiaries. State Medicaid agencies and managed care organizations frequently contract with these third-party managers that assume responsibility for arranging nonemergency medical transportation for eligible Medicaid beneficiaries. Brokers are typically responsible for all functions of a transportation program, including verification of a recipient's eligibility, determination of the appropriateness of trips, and arrangement of the most efficient means of transportation. Brokers are also responsible for documenting and reporting beneficiary and trip data. Brokers execute contracts with public or private transportation providers that provide trips to eligible beneficiaries under the supervision of the broker. A broker may operate statewide or within a designated region.
CCAM Technical Assistance Center	The CCAM Technical Assistance Center is a multiagency unit proposed by the CCAM that will engage CCAM agencies to develop transportation coordination guidance and create a structure for joint communications to transportation coordination stakeholders.
CCAM agency	A CCAM agency is one of the 11 Federal agencies that form the CCAM. Each CCAM agency contributes to the fulfillment of the Council's vision

	<p>of equal access to coordinated transportation for all Americans. CCAM agencies include the following: U.S. Department of Agriculture (USDA); U.S. Department of Education (ED); U.S. Department of Health and Human Services (HHS); U.S. Department of Housing and Urban Development (HUD); U.S. Department of the Interior (DOI); U.S. Department of Justice (DOJ); U.S. Department of Labor (DOL); U.S. Department of Transportation (DOT); U.S. Department of Veterans Affairs (VA); National Council on Disability (NCD); and U.S. Social Security Administration (SSA).</p>
CCAM agency point of contact (POC)	<p>A CCAM agency point of contact (POC) is the liaison between a CCAM agency and the Council. They are Federal employees selected by their agency's CCAM member and are responsible for managing their agency's operating divisions' interactions with the CCAM.</p>
CCAM agency support staff	<p>The CCAM agency support staff are Federal employees that provide day-to-day planning and execution of CCAM functions, which includes maintaining momentum on the CCAM's strategic goals. CCAM agency support staff share vital agency-specific transportation coordination information; propose changes to Federal law, regulations, and guidance; and recommend internal operational activities to promote transportation access and availability.</p>
CCAM member	<p>A CCAM member is the official Cabinet-level member of the CCAM, as identified by Executive Order 13330, or their designee. Their designee must be a full-time employee serving in a position with pay equal to or greater than the minimum rate payable for GS-15 of the General Schedule and be able to perform functions of the Council or its subgroups on the member's behalf. These members are responsible for providing strategic direction to the CCAM and performing functions of the Council.</p>
Chief Mobility Coordination Officer (CMCO)	<p>The Chief Mobility Coordination Officer (CMCO) is proposed by the CCAM to be a dedicated senior official that dedicates a portion of their working time to the CCAM and transportation coordination efforts within their agency.</p>
Coordinated plan	<p>See Locally developed, coordinated public transit-human services transportation plan.</p>
Coordination	<p>In the context of the CCAM, coordination is the act of organizing federally funded transportation programs and sharing resources across CCAM agencies to improve the accessibility, availability, and efficiency of transportation services to targeted populations.</p>
Cost sharing	<p>Cost sharing occurs when partners share common costs of a transportation service or a transportation project in a manner that is based equitably on the benefit received. Cost-sharing arrangements include both Federal fund braiding for local match as well as vehicle and ride sharing across Federal programs.</p>
Cost-sharing principles	<p>Cost-sharing principles are standards on how to develop an equitable allocated cost model.</p>
Demand response service	<p>Demand response service is nonfixed route transportation that requires advanced scheduling by the customer. (Source: CCAM Interagency Collaboration Work Groups)</p>

Duplication	Duplication occurs when two or more agencies or programs are engaged in the same activities or provide the same services to the same beneficiaries. (Source: U.S. Government Accountability Office)
Efficiency	In the context of the goals of the CCAM, improved efficiency occurs when funding recipients save funds by sharing resources and reducing duplication of services.
Eligibility requirements	Eligibility requirements are statutory and/or regulatory restrictions on the types of individuals who are eligible to receive services and/or benefits funded by a specific program.
Fixing America’s Surface Transportation (FAST) Act	The Fixing America’s Surface Transportation (FAST) Act was signed into law on December 4, 2015 as the Federal funding and authorization bill governing U.S. surface transportation programs. The act authorizes the surface transportation programs of the U.S. Department of Transportation for FY2016 through FY2020.
Federal fund braiding	See Federal fund braiding for local match .
Federal fund braiding for local match	Federal fund braiding for local match occurs when Federal funds from one grant program are used to fulfill the local match requirement of another Federal grant. All statutory and regulatory requirements, such as eligibility and reporting, must be met for both programs.
Federal Fund Braiding Guide	The Federal Fund Braiding Guide is a CCAM resource that defines Federal fund braiding and program eligibility to enable Federal agencies and Federal grant recipients to more effectively manage Federal funds and coordinate human services transportation services, as of October 2019.
Fragmentation	Fragmentation occurs when more than one Federal agency (or more than one organization within an agency) is involved in the same broad area of national need and opportunities exist to improve service delivery. (Source: U.S. Government Accountability Office)
Fully allocated cost	The fully allocated cost is the total cost of providing a transportation service that accounts for both direct and indirect expenses. (Source: CCAM Interagency Work Groups)
Guidance	Guidance refers to how Federal agencies explain the manner in which regulations should be interpreted.
Human service transportation	Human service transportation includes transportation programs or services geared toward underserved populations, including Veterans, people with disabilities, older adults, and individuals of low income. Medicaid nonemergency medical transportation is included in some state definitions of human service transportation. (Source: Transportation Research Board)
Incoming Federal fund braiding	Incoming Federal fund braiding occurs when Federal programs’ match requirements are fulfilled by other Federal funds.
Interagency collaboration	In the context of the CCAM, interagency collaboration is the process by which CCAM agencies work together and achieve the goals outlined in the CCAM Strategic Plan.

Interagency work group	In the context of the CCAM, an interagency work group is composed of CCAM agency support staff and tasked to identify and address barriers to coordinated transportation.
Locally developed, coordinated public transit-human services transportation plan	The Federal Transit Administration (FTA) Section 5310 Enhanced Mobility for Seniors and Individuals with Disabilities program requires funding recipients to be included in a locally developed, coordinated public transit-human services plan that is developed and approved through a process that includes participation by seniors; individuals with disabilities; representatives of the public, private, and nonprofit transportation and human services providers; and other members of the public utilizing transportation services. These plans identify the transportation needs of older adults, individuals with disabilities, and individuals of low income; provide strategies for meeting these needs; and prioritize transportation services for funding and implementation. (Source: U.S. Department of Transportation)
Local match	Local match is the required non-Federal share in federally supported grants or contracts. (Source: CCAM Interagency Work Groups)
Medical ride	A medical ride is a transportation trip for a person to receive medical services.
Mobility management	In the context of this report, mobility management is an innovative approach for managing and delivering coordinated transportation services to customers, including people with disabilities, older adults, and individuals of low income. Mobility management focuses on meeting individual customer needs through a wide range of transportation options and service providers. It also focuses on coordinating these services and providers to achieve a more efficient transportation service delivery system. (Source: U.S. Department of Transportation)
Nonemergency medical transportation (NEMT)	Nonemergency medical transportation (NEMT) is transportation to or from any health care service excluding emergency medical services.
Nonfixed route transportation	Nonfixed route transportation is a transportation system that does not operate on a predetermined route according to a predetermined schedule.
Nonmedical ride	A nonmedical ride is a transportation trip for a person to receive services that are not medical in nature.
Operating Division	An operating division is an office, sub-agency, or division that is responsible for a specific function of a Federal agency.
Operating Model	An operating model outlines how an organization arranges and manages its resources to achieve its strategic goals.
Outgoing Federal fund braiding	Outgoing Federal fund braiding occurs when Federal program funds are used to fulfill the match requirement of another Federal program.
Overlap	Overlap occurs when multiple agencies or programs have similar goals, engage in similar activities or strategies to achieve them, or target similar beneficiaries. (Source: U.S. Government Accountability Office)

Paratransit	Paratransit includes any type of passenger transportation that is more flexible than conventional fixed route transit but more structured than the use of private automobiles. Paratransit includes demand response transportation services, shared-ride taxis, and car-pooling and vanpooling. Paratransit most often refers to wheelchair-accessible, demand response service. The Americans with Disabilities Act (ADA) and Department of Transportation (DOT) regulations require public transit agencies that provide fixed route transit service (bus and rail) to also operate complementary paratransit service for people with disabilities who cannot use fixed route bus or rail service. (Source: U.S. Department of Transportation)
Pilot program	A pilot program is a small-scale preliminary study conducted to evaluate the feasibility and scalability of a program design.
Program Inventory	The CCAM Program Inventory is a catalog identifying 130 Federal programs that can provide funding for human services transportation for people with disabilities, older adults, and/or individuals of low income. The CCAM Program Inventory includes detailed program information, such as CFDA numbers and statutory references, information on recipients and beneficiaries, and eligible transportation activities.
Providers	A provider is an entity that delivers transportation services to targeted populations.
Public transportation	Public transportation is regular, continuing shared-ride surface transportation services that are open to the general public or open to a segment of the general public defined by age, disability, or low income. (Source: 49 U.S.C. 5302)
Ride sharing	Ride sharing is a resource sharing strategy in which a vehicle provides service to more than one beneficiary in the same trip. Ride sharing may include multiple beneficiaries going to the same location, or they may include multiple beneficiaries going to different but proximate locations.
Service area	A service area is a geographic area in which a program or organization primarily provides service. Some programs or organizations may provide service outside of the service area under specified circumstances.
State and local stakeholders	In the context of the CCAM, State and local stakeholders are non-Federal entities that deliver or are impacted by transportation services. They include funding recipients of programs funded by a CCAM agency that serve people with disabilities, older adults, and/or individuals of low income.
Targeted populations	Targeted populations include persons with disabilities, older adults, low-income individuals, and intended to benefit from coordinated transportation. (Source: CCAM Interagency Work Groups)
Technical assistance	Technical assistance is the process of providing targeted support to an organization with a need or problem. (Source: U.S. Department of Health and Human Services)
Transit	See Public transportation .
Transportation coordination	See Coordination .

Trip purpose restrictions

Trip purpose restrictions are statutory and/or regulatory restrictions on the trips that are eligible to be funded by a particular program. For example, some programs may only fund trips that provide transportation directly to or from a specific location or type of location.

Uniform Guidance

The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (commonly referred to as “Uniform Guidance”) is an authoritative set of rules and requirements implemented by the Office of Management and Budget (OMB) that aim to simultaneously reduce the administrative burden on award recipients and guard against the risk of waste and misuse of Federal funds.

Vehicle sharing

Vehicle sharing is a resource sharing strategy in which one organization transports beneficiaries of other organizations, or one organization allows other organizations to use its vehicles. (Source: CCAM Interagency Work Groups)

Appendix

1. “CCAM Cost-Sharing Policy Statement.” 2020.

<https://www.transit.dot.gov/regulations-and-programs/ccam/about/ccam-cost-sharing-policy-statement>

The CCAM Cost-Sharing Policy Statement focuses on nonemergency medical transportation and contains principles, strategies, and tools to promote Federal fund braiding and vehicle and ride sharing. The principles include both general transportation cost-sharing principles that could apply to all CCAM agencies, and CMS- and VA-specific cost-sharing principles.

2. “CCAM Meeting Agenda and Intended Outcomes.” 2019.

<https://www.transit.dot.gov/regulations-and-programs/ccam/about/coordinating-council-access-and-mobility-ccam-meeting-agenda-and>

The CCAM Meeting Agenda and Intended Outcomes shows the agenda and intended outcomes of the October 29, 2019 CCAM meeting.

3. “CCAM Meeting Presentation.” 2019.

<https://www.transit.dot.gov/regulations-and-programs/ccam/about/coordinating-council-access-and-mobility-meeting-presentation>

The CCAM Meeting Presentation contains the slides used to guide discussion at the October 29, 2019 CCAM meeting. It includes slides from HHS and VA’s presenters.

4. “CCAM Program Inventory.” 2019.

<https://www.transit.dot.gov/regulations-and-guidance/ccam/about/ccam-program-inventory>

The CCAM Program Inventory identifies 130 Federal programs that are able to provide funding for human service transportation for people with disabilities, older adults, and/or individuals of low income.

5. “Coordinated Human Service Transportation Planning Final Policy Statement.” 2006.

<https://www.transit.dot.gov/ccam/policies-programs/ccam-policy-coordinated-planning>

The Coordinated Human Service Transportation Planning Final Policy Statement encourages CCAM agency grantees with significant involvement in transportation delivery to participate in local coordinated human services transportation planning processes.

6. **“Executive Order 13330: Human Service Transportation Coordination.” 2004.**
<https://www.transportation.gov/sites/dot.gov/files/docs/eo13330.pdf>

Executive Order 13330: Human Service Transportation Coordination was signed by President George W. Bush in 2004. It created the CCAM in order to enhance access to transportation to improve mobility, employment opportunities, and access to community services for transportation-disadvantaged populations.

7. **“Federal Fund Braiding Guide.” 2020.**
<https://www.transit.dot.gov/regulations-and-programs/ccam/about/coordinating-council-access-and-mobility-ccam-federal-fund>

The Federal Fund Braiding Guide provides information for Federal employees and potential grantees on whether CCAM agency programs may participate in “Federal fund braiding,” or the use of Federal program funds to fulfill the match requirement of other Federal programs on eligible transportation projects.

8. **“Fixing America’s Surface Transportation Act.” 2015.**
<https://www.congress.gov/114/plaws/publ94/PLAW-114publ94.pdf>

The Fixing America’s Surface Transportation (FAST) Act authorized \$305 billion for FY2016–FY2020 for surface transportation projects, including public transportation projects. The FAST Act created several requirements for the CCAM in Section 3006(c).

9. **“Focus Group Report.” 2018.**
<https://www.transit.dot.gov/regulations-and-guidance/ccam/about/ccam-focus-group-report>

The Focus Group Report presents the findings of the CCAM’s 2018 State and local focus groups. These findings include perceived barriers to transportation coordination, broken out by stakeholder category, as well as potential recommendations to address these barriers.

10. **“Joint Work Group Meeting Minutes.” 2017.**
<https://www.transit.dot.gov/regulations-and-guidance/ccam/about/ccam-joint-work-group-meeting-july-2017>

The Joint Work Group Meeting Minutes include a comprehensive summary of the outputs of the Federal interagency work groups in 2017.

11. **“National Center for Mobility Management (NCMM) Survey Analysis.” 2019.**
<https://www.transit.dot.gov/regulations-and-guidance/ccam/about/comprehensive-national-center-mobility-management-ncmm-survey>

The NCMM Survey Analysis summarizes the results of the 2018 NCMM survey to State and local transportation and human service providers on best practices and barriers around transportation coordination. The analysis includes results segmented by the funding CCAM agency and whether the respondents’ organizations served rural or non-rural areas.

12. “National Center for Mobility Management (NCMM) Survey Analysis – Agency Results.” 2019.

<https://www.transit.dot.gov/regulations-and-guidance/ccam/about/ncmm-survey-analysis>

The NCMM Survey Analysis – Agency Results are ten individual PowerPoint presentations that summarize the results of the 2018 NCMM survey to State and local transportation and human service providers on best practices and barriers around transportation coordination. Each presentation displays the individual survey results of the stakeholders of a single CCAM agency or operating division. There are presentations for USDA, ED, HHS, HUD, DOL, DOT, VA, and SSA, as well as the Centers for Medicare and Medicaid Services (CMS) and the Corporation for National and Community Service (CNCS).

13. “Report to the President—Human Service Transportation Coordination Executive Order 13330.” 2005.

<https://www.transit.dot.gov/regulations-and-guidance/ccam/about/report-president-human-service-transportation-coordination>

The CCAM’s 2005 Report to the President was a requirement of Executive Order 13330 and includes a description of how Executive Order 13330 was implemented and recommendations to advance the principles of the Executive Order.

14. “Strategic Plan 2019–2022.” 2019.

<https://www.transit.dot.gov/regulations-and-guidance/ccam/about/ccam-strategic-plan-2019-2022>

The CCAM’s Strategic Plan for 2019 through 2022 contains four strategic goals, each with two to three supporting objectives, for the CCAM to achieve in order to improve transportation availability, accessibility, and efficiency for transportation-disadvantaged populations. This resource was approved by the CCAM at the 2019 CCAM meeting.

15. “Vehicle Resource Sharing Final Policy Statement.” 2006.

<https://www.transit.dot.gov/ccam/policies-programs/ccam-policy-vehicle-sharing>

The Vehicle Resource Sharing Final Policy Statement includes a statement encouraging CCAM agency grantees to coordinate vehicle use, which clarifies that Federal cost principles do not restrict grantees to serving only their own clients. The policy applies to any Federal program that allows funds to be used for transportation services.