

FTA Webinar on the Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA)

Wednesday, January 13, 2021

Edits have been made to this transcript for clarity.

Welcome to FTA's webinar on the Coronavirus Response and Relief Supplemental Appropriations Act, or what we're calling CRRSAA. I am Kimberly Sledge, the Acting Associate Administrator for the Office of Program Management.

So, before we begin a few items to note. For closed captions, please click in the bottom right hand corner on the CC icon. And there you can select your language and text size. You may also submit questions via the chat box anytime during the presentation. There will be time at the end of the presentation to address as many questions as possible in the remaining time.

Now I'll turn it over to our Executive Director, Matt Welbes.

Matt Welbes

Thank you, Kim, and good afternoon everyone. Thank you for joining us for this informational session on the Coronavirus Response and Relief Supplemental Appropriations Act of 2021. On behalf of FTA Acting Administrator Jane Williams, I just want to begin by saying thank you to all of you. Since the beginning of the COVID-19 public health emergency, the people in the transit industry have provided essential services to communities large and small across the nation. You've helped transport essential workers in healthcare, food services, and delivering jobs that sustain all of us in the past year. So, thanks for your resilience and your commitment to providing that critical transportation service for every American who depends on public transportation every day. During this webinar, our FTA presenters will provide an overview of the Coronavirus Response and Relief Supplemental Appropriations Act – which, as Kim noted, we're calling CRRSAA – including funding levels and eligibility as well as take your questions.

First, I'd like to just take a moment and review some of the FTA response to the COVID-19 Public Health Emergency, and preview how we will continue that work in our partnership to ensure that the transit industry nationwide can remain safe and continue to support communities as we work on responding to and recovering from COVID-19. When the CARES Act became law last March, FTA worked around-the-clock to distribute 25 billion dollars in emergency assistance to support transit agencies. To date, we've

awarded more than 95% of the CARES Act grant money, totaling 23.6 billion dollars. That's keeping our country and our economy moving. Of that, we've distributed a bit more than half of the funding: 14.9 billion dollars. That's money that transit grantees have drawn from the US Treasury, so please continue to focus on spending down your CARES Act funding promptly. And then prior to the CARES Act, FTA identified administrative relief measures, expanded the federal transit government share of agency operating expenses to 100, and we extended several competitive program applications and regulatory deadlines to give our grantee some breathing room to respond to COVID-19 health emergency. And then working with our partners at FEMA, DOT helped distribute more than 100 million face coverings across the transportation network, including about 14 million masks to 2200 transit agencies for frontline workers as well as passengers to support safe operations.

And then during 2020, FTA hosted several industry listening sessions on how transit agencies nationwide are working to manage and provide service during the public health emergency. The past seven sessions have helped facilitate really an exchange of ideas to help the participants learn from each other about what's working, what isn't, and how we can make further improvements together. So those sessions have provided valuable strategies for transit agencies as well as FTA to consider as the transit agencies manage service, including ways to instill confidence in the safety of their systems, and we really look forward to hosting additional similar sessions during 2021.

Of course, we know that transit agencies and states continued to experience significant operational and financial challenges due to the COVID-19 public health emergency. So, with the enactment of CRRSAA into law on December 27th, 14 billion dollars was allocated to the public transit industry. There's 13.26 billion dollars for urbanized areas. There's 678.2 million dollars for rural and tribal governments. And then there is \$50,000,000 for the first time provided to support public transportation operators delivering Enhanced Mobility for Seniors and Individuals with Disabilities – what people in the transit often industry often call “Section 5310” program funds. So, the legislation emphasizes that funding will be prioritized for transit agency, payroll and operations; that's in statute. And similar to CARES Act, the supplemental funding under CRRSAA will be provided at a 100% federal share with no local match required. The Act does include funding limits based on 2018 operating expenses, with available amounts capped for urbanized areas at 75% and rural areas at 125%, and it includes support received under both the CARES Act and the new CRRSAA allocations. The FTA speakers will go into greater detail on this topic which I know is one of interest, and we've posted specific funding amounts in the apportionment tables

on the FTA website. So again, I do urge you to be attentive and spend down the unobligated and obligated CARES Act funding as soon as possible, really with a focus on payroll and operations.

I also want to take a moment to share an FTA organizational update with you. I think many of you know that after 40 years of federal service, including 20 years of tremendous support for the transit industry, FTA CFO Bob Tuccillo retired at the end of 2020. So, with Bob's retirement, Bruce Robinson is currently serving as FTA's Acting CFO, and then Kim Sledge, who introduced me, is now serving as FTA's Acting Associate Administrator for Program Management. We're really fortunate to have a deep bench of talented leaders who stepped forward when the circumstances require it. And so, I'm very grateful to both Bruce and Kim for performing the roles they are right now. So, as I close I just want to once again thank all of you for what really are heroic efforts during unprecedented challenging circumstances. And throughout our history when things become difficult, we rise to the occasion. And how we've responded, and how we will continue to respond to this public health emergency, I think really reflects our collective resilience, our strength and our commitment to supporting the American people right now. So, let me turn this back over to Kim, who is going to lead the webinar. Thank you.

Kim Sledge

Thank you, Matt. So now I'll turn the presentation over to Alexandria Burns. She's a program analyst in our Urbanized Area Division in FTA's Office of Transit programs. Alex.

Alexandria Burns

Thank you, Kim. This webinar does not have the force and effect of law and is not meant to bind the public in any way. The webinar is intended only to provide clarity to the public regarding existing requirements under the law or agency policies. Grantees and subgrantees should refer to FTA statutes, and regulations for applicable requirements. Today, you'll be provided an overview of the Coronavirus Response and Relief Supplemental Appropriations Act of 2021, which we'll be referring to as CRRSAA. Prior to the enactment of CRRSAA in response to COVID-19, FTA expeditiously allocated 25 billion dollars in CARES Act funding; authorized the use of previously apportioned 5307 and 5311 funding under the Emergency Relief Program at 100% federal share for COVID related expenses; extended competitive deadlines, as well as due dates for grant reporting; postponed not only oversight reviews, but also certain NTD reporting requirements; with a focus on safety, issued a safety advisory; and distributed over 14 million cloth face coverings to twenty two hundred (2,200) transit systems. As previously stated,

the CARES Act provided a total of 25 billion dollars, which encompassed urbanized and rural areas and tribal transit formula funds, in addition to funding for administration and oversight. These funds were provided to support transit in response to COVID-19.

As of January 5th, FTA has awarded 778 CARES Act grants and obligated 95% of the total apportioned funds, totaling 23.6 billion dollars. Of this amount, 14 billion dollars has been dispersed. FTA continues encouraging recipients to use funds expeditiously. In response to COVID-19, the Coronavirus Response and Relief Supplemental Appropriations Act of 2021, or CRRSAA, provided \$14 billion dollars to support the transit industry. The allocations are \$13.26 billion to the urbanized area program, \$678 million to the Rural Formula Area 5311 program, including \$30,000,000 for tribal formula, and \$50,000,000 to the Enhanced Mobility of Seniors and Individuals with Disabilities 5310 program, and \$10,000,000 for administration and oversight.

CRRSAA had five key takeaways, three of which are the allocation of supplemental funding for Section 5310, emphasis on the primary use of funding for payroll and operations, and permitting private providers of public transportation to be subrecipients. For the remaining two, CRRSAA allocation thresholds take into account funding allocations under the CARES Act by limiting the total CARES Act and CRRSAA allocations for urbanized areas to 75% of the 2018 NTD reported operating costs and limiting the CARES Act and CRRSAA allocations for rural areas to 125% of the 2018 NTD reported operating costs.

Federal apportionments are allocated at the urbanized area or state level and not at the recipient or subrecipient level. Because of this, the governor determines the designated recipient of urbanized area apportionments. After assigned, the designated recipient must inform FTA of the arrangement in a split letter, which establishes the allocation of Section 5307 funds in large UZAs. For funds attributable to small UZAs, a state must inform FTA of such arrangements in an annual apportionment letter. Recipients or grantees in shared UZAs are encouraged to coordinate with the designated recipient of that urbanized area to obtain their allocation, and subrecipients are encouraged to coordinate with FTA recipients to obtain their allocation.

The total 5307 urbanized area amounts for CARES Act and CRRSAA combined may not exceed 75% of 2018 NTD reported operating costs for urbanized areas. Urbanized areas whose CARES Act funds exceeded the 75% operating expense threshold will not be allocated additional funds under CRRSAA,

nor will they be required to return CARES funding that exceeds the 75% threshold. Urbanized areas whose CARES Act funds were less than the 75% of 2018 NTD operating expenses will receive additional funds from CRRSAA up to the 75% threshold. To reiterate, the 75% threshold is at the urbanized area level and not at the recipient level. For recipients in shared urbanized areas, allocations are determined at the local level. Recipients should visit FTA's published apportionment tables and coordinate with designated recipients for specific amounts in their area. CRRSAA allocated 13.26 billion dollars to urbanized areas. Funding was apportioned in accordance with formulas for section 5307 and 5337. In comparison to fiscal year 2020 appropriations, the formula distribution for urbanized area CRRSAA funds are approximately 65 percent for 5307 and approximately 35% for 5337. CRRSAA excludes funding for the Passenger Ferry Competitive and State Safety Oversight Formula programs.

The CARES Act allocated approximately 22.7 billion in urbanized area funding which included 5340 Growing States and High Density States formulas. These areas received anywhere between 27 to 125,000 percent of 2018 operating expenses. From this, 140 areas received less than 75% of 2018 operating expenses whereas 360 areas exceeded this threshold. At this time, Sarah Clements will discuss additional CARES and CRRSAA information.

Sarah Clements

Thanks Alex. For the rural area funding section 5311, the CARES and CRRSAA funds for a state may not exceed 125 percent of the rural operating costs reported to the 2018 NTD. States whose CARES Act funds exceeded 125 percent of their 2018 operating expenses will not receive CRRSAA funds, but they will not be required to return any CARES funds. States whose CARES funds were less than 125 percent of their operating expenses will receive funds from CRRSAA up to the 125 percent threshold. Specific amounts will be on the FTA apportionment tables and the requirement for states to spend up to 15 percent of their apportionment on intercity bus transportation does not apply to CRRSAA, although intercity bus is still an eligible expense. CRRSAA will provide \$648 million for formula grants for rural areas and \$30 million for formula grants for tribal areas. The tribal formula grants will be apportioned in the same way as the FY20 appropriation and CARES funds. The rural formula funds will be apportioned in accordance with Section 5311. Funds are apportioned to states; it is up to each state to determine the allocation to subrecipients. Under the CARES Act, of the \$2.178 billion, States and territories received between 26 percent and 300 percent of their 2018 operating expenses. So, the breakdown is 22 States

and territories received less than 125 percent and 32 were above. Now I'll turn the presentation over to Marianne Stock for the next slide.

Marianne Stock

I'm going to be talking about the Enhanced Mobility of Seniors and Individuals with Disabilities, or Section 5310 program. So, as was mentioned earlier, CRRSAA for the first time allocated \$50,000,000 for Section 5310 public transportation providers nationwide. The CARES Act did not have any funding for Section 5310. Section 5310 funds, similar to what's already been talked about with the other programs, are apportioned to Designated Recipients in large urbanized areas and to States in small urbanized and rural areas, and those designated recipients or states determine the allocation to subrecipients. Therefore, if you are traditionally a subrecipient in the Section 5310 program, you are encouraged to work with the designated recipient or the state to understand your potential share of this funding. CRRSAA funding is eligible to be used for operating costs at 100% federal share--no match required. The requirement to use 55% of funds for traditional capital projects does not apply to CRRSAA of funds. That's a requirement that applies to all regular section 5310 funds under the regular annual program. However, the coordinated Human Services transportation plan requirement that applies to section 5310 does apply to CRRSAA funding. And the other interesting aspect of CRRSAA is that permits funds that have been previously appropriated but have not yet been obligated to a recipient to be awarded at the 100% federal share. Those funds, however, must still meet the 55% requirement and be included in a coordinated plan. Now I'm going to turn it back to Sarah for some more information.

Sarah Clements

Thanks Marianne. For eligible expenses, CRRSAA funds as well as any unobligated CARES funds should be used for payroll and operations as much as possible, unless the recipient has certified to FTA that no employees have been furloughed. Expenses subject to this requirement include capital expenses like vehicle procurements or facility construction. Operating expenses for all recipients, including large urbanized areas, are still eligible beginning January 20th, 2020. This includes administrative leave, vehicle operator salaries, fuel, and items with a useful life of less than a year.

Here are some features common to both CARES and CRRSAA. The federal share is 100%; no matching funds are needed. Pre-award authority is available back to January 20th, 2020. And the funds don't lapse, but recipients are encouraged to use them expeditiously. All federal transit program requirements

apply to CARES, Act, and CRRSAA funding, including certification by the Department of Labor for 5307 funds. For 5311 funds, DOL is notified, but no certification is needed, and for 5310 funds this does not apply. If the apportionment is being shared between two transit providers, then a new split letter is needed. And as far as exceptions go, some expenses do not need to be in a TIP, a STIP or a long-range transportation plan. The emergency relief docket is available for grantees who need to ask for additional regulatory or statutory relief above and beyond what's already provided, and I'd like to stress that recipients should contact their regional office before submitting anything to the docket, because sometimes a transit provider's issue can be addressed by working directly with the regional office. Now, I'd like to turn the presentation over to Josh Kamp.

Josh Kamp

Thank you, Sarah, good afternoon. CRRSAA has been structured in TrAMS by unique funding source. The table displayed presents the specific funding source short codes for each 5307, 5311, and 5310 CRRSAA program. The appropriation code for CRRSAA is 28. Please always double check and confirm the correct appropriation code has been selected for CRRSAA. Per OMB requirement. CRRSAA grants entered into TrAMS should not be combined with any other funding sources, including CARES Act funding. Similarly, CARES act funding entered into TrAMS should not be combined with any other funding source – in other words, a super grant. There are a few reminders about the electronic clearinghouse operation web application. Please be aware of timing between drawdown request and receipt of funds in ECHO. Please remember payments are only processed twice a day on established business days. Additionally, drawdown requests made by 2:00 PM Eastern Standard Time will usually be available to the requestor in the morning of the next business day. Drawdowns need to be for immediate disbursement. Funds drawn from ECHO need to be taken in line with the request made by the recipient. Also, if a single request exceeds \$50,000,000, a notice must be provided to Treasury via the Office of Budget and Policy 3 full calendar days before funds can be issued. Thank you and the next slide goes to Alex.

Alexandria Burns

Thanks Josh. For additional information, please visit FTA's website at [transit.dot.gov](https://www.transit.dot.gov) for CARES Act and CRRSAA apportionment tables, and check back soon for updated FAQs. The CRRSAA Apportionment Notice will be published in the Federal Register. At this time. I'll turn it over to the Office of Transit Programs' Director, John Bodnar, who will lead the Q&A session of this webinar.

John Bodnar

Alright, thanks Alex. Hello, everyone. Just a few notes before we start on the Q&A session. First of all, as Alex mentioned, the CRRSA apportionment tables are currently posted on FTA's website. If you haven't seen them yet, you can go to transit.dot.gov and you'll find them there. So please go and review them to find out how much your area was apportioned for CRRSAA. FTA is still working to make funds available in TrAMS, so we're not quite there yet. And we're also working to post the certifications and assurances on our website. Those actions will be completed soon, so check back later this week. During the Q&A session, we will not be answering questions about specific apportionments allocations. For questions like that you can contact your FTA regional office, who will collect those questions and then get them to the right person in order to respond. OK, so, for the first batch of questions, looks like we have several for the 5310 program, so these will be for Marianne.

Q: OK I am a 5310 direct recipient with subrecipients. Many subrecipients have only received vehicles in the past but have a need for operating funds. Can I allocate CRRSAA operating funds to those sub recipients?

A [Marianne Stock]: Yes, CRRSAA funds are eligible to be used for operating, and no match is required; it can be 100% federal and the requirement to use 55% of funds for traditional capital projects does not apply to CRRSAA funding. However, coordinated planning requirements do still apply, and if the distribution method varies from how it is described in an existing State Management Plan or Program Management Plan, the differences about how CRRSAA funds are being distributed should be documented.

Q: OK. So, here's one. I am a Section 5010 subrecipient. We desperately need operating funds to provide service to our constituents. How will I know how much operating funding I will get?

A [Marianne Stock]: So, we are encouraging subrecipients to contact the direct recipient in your area that you've worked with in the past and coordinate with them, they will have the answer because those sub-allocations are determined at the local level.

Q: OK. Does CRRSAA allow Section 5310 funds that we already have to be used for capital projects at 100% federal share?

A [Marianne Stock]: Yes, previously apportioned funds that have not yet been obligated -- so it has to be unobligated and can't be in an existing grant – but if there is a portion of previously allocated 5310 that have not yet been obligated, that can be used at 100% federal share for either operating or capital. And, again, that funding does still need to meet the 55% requirement for traditional capital projects, and also, must be in a coordinated Human Services Transportation Plan.

Q: OK, so you mentioned that can happen with funds that have not been obligated, but with funds s that have been obligated, can a grant be amended to use the 100% match.

A [Marianne Stock]: Grants already obligated cannot be amended for that purpose.

Q: OK thanks, Marianne. Give you a break for a moment. It looks like we have a batch of questions about eligibility and requirements. So, these next few will be for Alex. Can CRRSAA funding be used to purchase PPE and other protective equipment?

A [Alexandria Burns]: Yes, funding can be used for operating expenses such as personal protective equipment and cleaning supplies.

Q: Great. It's another one for Alex. Is there additional oversight or administrative requirements for recipients who use CRRSAA's funding?

A [Alexandria Burns]: No. There are no additional oversight or administrative requirements. The requirements remain in effect for the various programs. Program activities and associated eligibilities outlined in existing funding programs must be met unless waived.

Q: OK, where can we find information on what regulatory relief FTA has provided in response to COVID-19?

A [Alexandria Burns]: Additional information can be found on our public website, specifically our FAQ webpage or our CRRSAA or COVID-19 landing pages, as well.

Q: Can you do the next one? Are planning activities eligible with CRRSAA funding?

A [Alexandria Burns]: It is allowable as long as a recipient has certified that it hasn't furloughed any employees.

Q: OK so, it looks like we've got a 5310 question here, so this is for Marianne. And actually, I think this question we addressed in the PowerPoint, but it's an important piece of information, so maybe we can go back over it again. When allocating the 5310 funds, is the designated recipient or state required to allocate the funds based on the 55% traditional and 45% non-traditional projects allocation rule?

A [Marianne Stock]: And the answer there is not for CRRSAA funds. For CRRSAA 5310 funds, the recipients are encouraged to allocate all of it to operating costs to the greatest extent possible, and the 55% does not apply to CRRSAA funds directly, but any existing other 5310 funds that are going to be allocated now that come from the regular 5310 program, no matter what year those funds are, do have to file at the 55% requirement.

Q: OK. So this question was about 5310 and 5311, but it actually applies to 5307 CRRSAA funds as well, so I'll ask this of Sarah. Do CRRSAA transit funds have to be obligated by September 30th, 2021.

A [Sarah Clements]: No, they don't, CRRSAA funds don't lapse.

Q: OK. Here is another one about 5310. So back to Marianne. Can states require normal local match amounts for CRRSAA funds; that is, a required 20% match for any CRRSAA funds used for mobility management grants and 50% match for any operating assistance grants? I guess that would be for subrecipients.

A [Marianne Stock]: Yes, I believe there is not a restriction on that: it can be used up to 100% for local match, but if anyone wanted to provide a partial match, that's allowed.

Q: OK this one, I think, is for Alex, but let me know if you think it should go somewhere else. Alex, if a transit agency is not included in the Apportionments, but the state is, should that transit agency go to

the state – the eligible direct recipient – to see if there is an opportunity to be a subrecipient for CRRSAA of funds?

A [Alexandria Burns]: That's interesting. So, I'm trying to understand the question. So if the transit agency is not included in the apportionments, but the state is, should that transit agency go to the state? So, I believe it depends on the location the services provided by that transit operator falls in. They can go to the state. We can't prevent them from going to the state, however, the designated recipient, as designated by the governor, determines how funds are allocated in an urbanized area. So, they would need to work with the designated recipient; however, can they become a subrecipient, but again they will need to work with the state to determine the state's subrecipient process and whether or not they want to go through those changes of becoming one. If they are eligible, then the state ultimately determines which expenses are eligible for Subrecipients to come in for. So even with that, it's a local decision.

Q: OK. OK, this question is about 5307, so this is also for Alex. If we have funds from previous years that are appropriated, but we have not yet applied for them, can we apply for those funds? And use the 5307 for operations?

A [Alexandria Burns]: Under the emergency relief program, for any expenses related directly to COVID-19, you can. So, whether it's a large urban or small urban previous 5307 apportionment, they can be used at the 100% federal share for operating expenses if it is directly related to COVID-19 under the flexibility of our emergency relief program for formula programs 5307 and 5311.

Q: Next is a question about 5310. Direct recipients have to follow an existing 5310 Program Management Plan. For selecting subrecipients for CRRSAA, can they come up with a different way to select projects to fund? So that's for Marianne.

A [Marianne Stock]: Yes, they can. You can vary from the Management Plan that is on file, but you should definitely document and notify your regional office how you're doing it and have that documented.

Q: OK. Another 5310 question for Marianne. Do we need to submit a POP or Human Services Plan for 5310?

A [Marianne Stock]: Yes, they need to. I'm not sure I fully understand the question, but any 5310 project, including those funded under CRRSAA, must follow the Coordinated Human Services Plan requirements, so they should be included in your Human Services Plan. And as far as the POP, yes, any 5310 Grant should have a POP if I'm understanding what they are asking about.

Q: OK. So, if whoever asked that didn't get the answer they're looking for, maybe rephrase the question, ask again, and we'll try to get you the answer. So maybe I'm going to ask you another question, because we were talking about this just before this webinar. For expenses other than operations or payroll, do states need to certify that no employees of any sub recipients have been furloughed? Where are states limited to providing funds to individual sub recipients based on furloughs at the subrecipient level?

A [Marianne Stock]: Yes, that is an excellent question and we are looking into that. We're still having to do a little bit of research about that, and there will be an FAQ posted when we are comfortable we have the right answer for everyone.

Q: OK this one is for Josh. Did the Treasury threshold of 50 million recently change under CARES? It was 100 million. Will this change remain in effect moving forward for all drawdowns?

A [Josh Kamp]: Hello, thank you for the question. I can really only speak to the statutory advancement in CRRSAA, which is 50 million. I'm sorry I don't have the specific knowledge with regard to future determinations, but, for now, for CRRSAA, and we have the \$50,000,000.

Q: OK this is this is one for Alex on 5307. Does the limitation of 75% of operating expenses within a UZA for 5307 funds apply to amounts apportioned to recipients by MPO's.

A [Alexandria Burns]: That would actually be a local decision. This 75% operating expense is at the UZA level. FTA isn't determining how or at what percentage or what threshold your designated recipient or your MPO for your area will allocate funding. We don't determine how they break that down for direct

recipients. Nor do we decide how the direct recipients will breakdown the ratio or how they'll distribute funds to the subrecipients. That'll be determined at your level.

A [John Bodnar] Just to add to that, if the local decision was that one recipient within the UZA needed more than 75% of their operating expenses then that would be their decision.

Q: OK as long as the overall threshold for the UZA is still 75% but within the UZA there is some leeway there to make those local decisions. OK, this is for Sarah I believe. Could you provide more detail about the types of projects that don't need to be included in a TIP or STIP?

A [Sarah Clements]: Sure. They would be projects with capital expenses that don't involve a substantial change to the location or function or capacity of an asset.

Q: Correct operating expenses, as well, do not need to be in the TIP/STIP. OK, 5310 again. So, this is Marianne. We have section 5310 funds from fiscal year 2020. And we'll have funds from fiscal year 2021. Can these funds be used at 100% Federal share?

A [Marianne Stock]: If they have not yet been obligated – when you say we have them, I'm not sure what that means – but if they haven't been obligated, they're not in an FTA grant at this time, then you would be able to. I believe that applies to both FY20 and 21. The Frequently Asked Questions are posted. That will be clarified exactly which years that applies to. But again, it only applies if the funds have not yet been obligated in a grant from the FTA. If they have, then they have to be used at the federal share that is in the existing grant.

Q: OK. This question could really be for anyone, so this one is Sarah. Can CRRSAA funds be used towards new service created during COVID? We have modified routes due to COVID an in response to ridership.

A [Sarah Clements]: I don't know the answer. I'm going to have to defer to maybe Marianne or Alex.

A [Alexandria Burns]: Sure, I'll take it, no problem. So typically, CRRSAA funds and CARES Act funds can be used for pretty much any eligible expense normally eligible under that program, whether 5307 or

5311, as long as the recipient has certified that they have no furloughs. So, I guess the best option would be to work with the regional Office to ensure you're complying. However, if it's an eligible expense, it is allowable as long as you certified to no furloughs.

Q: OK. Alright. Let's see. Let's send this one to Marianne here. What is the definition of private providers of public transportation?

A [Marianne Stock]: That's a stumper. I guess it's not a public transportation provider – it's a private company that operates transit service. I think there is. They commonly receive federal funds.- if they are under contract. Many transit authorities, I guess I'll say “contract with private companies to actually provide the transportation service. So, the reference to private providers being eligible to be subrecipients means that those types of companies that direct recipient would normally have a contract with for service can change their relationship from a contract-relationship to a grantee-Subrecipient relationship. I hope that's helpful.

Q: I think that was a good way to respond without mentioning any specific companies to prove the point. So, good job Marianne. Here's another one for you, Marianne: pre-award authority. It was mentioned that 5310 funding can be used for retroactive expenses. How far back does that go?

A [Marianne Stock]: I believe it's the same as for the other, the other program, so I believe it's January 20th, 2020.

Q: Yeah, another one for Marianne. We did advertise this was for 5310 recipients, so I guess I'm not surprised here. So, another 5310 question for Marianne. I am with an MPO over 200,000 and we run a competitive process for 5310 awards. We have never awarded funding for operations. Is it advisable to start awarding operating funds even though we have no history or structure in place to do so?

A [Marianne Stock]: That is an excellent question. What I would say is that the intent in CRRSAA, Congress made it quite clear that they would like for CRRSAA funds to be used for operating to the greatest extent possible, and again the provision about needing to certify that no employees have been furloughed. If you want to use it for capital, I understand the hesitation. I think. It's encouraged that you do use CRRSAA funds to the greatest extent possible for operations.

Q: OK. So, this is about the 5310 program, but it really applies to all of the programs that we've talked about today. So, Alex, is there a deadline for recipients to disperse allocations to subrecipients for Section fill-in-the-blank program, could be 5307, 5310 or 5311 there.

A [Alexandria Burns]: Yes, there is no deadline to disperse allocations. However, we are requesting that you obligate these funds and use them as expeditiously as possible. There is no deadline, but we do encourage you to use them and obligate them promptly.

Q: Alright, this one goes back to Marianne. As an eligible private company subrecipient operating as part of a wider state transit agency, how would we secure funding under CRRSAA?

A [Marianne Stock]: I guess I'm going to assume that the state transit agency is the direct recipient, and so I would suggest a conversation with that agency or with whatever agency is the direct recipient of funds in the area. And if I may take a point of privilege to go back to the other question about 5310, the MPO that has never awarded funding for operations before. I want to add something which is that, if you're an MPO or any entity in that situation and feeling the pressure, FTA has some mechanisms that we can help you, perhaps with some technical assistance, about how you might go about doing this if it's challenging for you, so I would encourage you to contact your regional office. We have the National Aging and Disabilities Transportation Center is a technical assistance center that provides technical assistance related to the section 5310 program, and so it's possible that we could help you as an entity figure out what to do if you contact that entity or contact your regional office and we might be able to help. So, I just wanted to offer that.

Q: OK so this one is for Alex. To clarify, if the recipient's CARES Act funding exceeds the 75% of 2018 operating expenses, do they need to return any excess funds?

A [Alexandria Burns]: No, they don't. They just wouldn't be apportioned additional funds under CRRSAA.

A [John Bodnar]: And Furthermore the 75% threshold applies to the urbanized area as a whole and not to an individual recipient.

Q: Let's see. Here's another one for Alex. Can funding be used for rapid testing equipment? I assume for COVID testing.

A [Alexandria Burns]: So.. we-I'm going to ask someone else to chime in on this one.

A [John Bodnar]: So, I'll take a stab at it and wanted to go back in and confirm. This funding is available for personal protective equipment and things of that nature. So, what we can do is we can check to see if this would be categorized in that manner so we can take a note on and get back to you unless anyone else has a better answer than I do.

Q: OK, so we'll take that one back for some research. Alright, to clarify, so this is about subrecipients, So, either Marianne or Sarah should take this one. Must subrecipients have been previously eligible or can they be newly eligible? So, perhaps they're speaking as to whether or not they are an existing subrecipient to a recipient.

A [Marianne Stock]: I'll take a stab at that to the extent possible, I think, it would be probably in the best interest of the direct recipient to follow their State Management Plan—to the extent possible. So, whatever the methodology for selecting, although it's not really up to FTA, that's really a local decision or the decision of the state or direct recipient that administers the Program Management Plan to determine how they're going to do that distribution. So, I guess that's actually really the answer, so it's a local decision. If you're in doubt about a specific situation, I would suggest consulting with your regional office.

Q: OK so we're getting close to time now. I think will have one more question here. Let's give this one to Sarah to start. Can CRRSAA funding be used for transportation to or from COVID vaccination sites.

A [Sarah Clements]: I'm going to have to defer to somebody else.

A: I'll jump in. There is a FAQ already posted on the FTA website, on the CARES website, FAQs that talk about a variety of funds that can be used and how they can be used for transportation and for other issues related around vaccination, and it will be updated when —maybe this is a good time to say all of

the FAQs will be updated, or those that need to be in light of CRRSAA – will be updated shortly and the updates will be posted when that happens. As regards to this specific question, you'll see more information about CRRSAA funding, specifically on that frequently asked question.

Q: Great, yeah, definitely keep an eye out for updated FAQs. There will be a GovDelivery announcement when those updated and new FAQs go live, so if you haven't signed up yet on FTA's website, please do so. And with that, I will turn the presentation back over to Kim Sledge to close this out again.

Kim Sledge

Alright thank you everybody. It was great. So, I'd like to thank everybody. Thank you all who have so admirably stepped up and demonstrating your commitment to help keeping America moving. Moving forward, we will be posting a recording of this webinar on the CRRSAA landing page. You can find it at www.transit.dot.gov, and we have that live for you now. We are also updating new FAQs in response to the passage of CRRSAA. So please be sure to sign up for notifications on FTA's website. Those are coming soon as well. I think that's it. So, thank you for attending, and this concludes today's webinar.