FEDERAL TRANSIT ADMINISTRATION

Calculating, Documenting, and Charging Operating Expenses Webinar

April 2021

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Purpose of This Webinar

- Discuss eligible operating expenses
- Explain how to calculate FTA operating assistance
- Examine appropriate documentation of operating expenses and Electronic Clearing House (ECHO) draws
- Describe recommended actions if an error is made in calculating operating assistance



All Large Urban Systems Now Eligible for Operating Assistance

- Previously, large urban systems (over 200,000 population urbanized area) with more than 100 buses in peak demand service were ineligible for operating assistance
- All recipients eligible to draw down FTA operating assistance at 100% through COVID-19 relief programs:
 - Emergency Relief Program
 - Coronavirus Aid, Relief, and Economic Security (CARES) Act
 - Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA)
 - American Rescue Plan Act of 2021 (ARPA)

Who is an FTA Recipient?

- Any entity that is receiving funds from FTA directly
 - Municipal and County Governments
 - Transit Authorities
 - Indian Tribes and Alaska Native tribal governments
 - States
 - Metropolitan Planning Organizations (MPOs)
- A <u>subrecipient</u> is an entity that receives FTA funds through a direct FTA recipient
 - Section 5311 funds are awarded by States to subrecipients
 - Many Section 5307 and 5310 funds are awarded by States or other FTA recipients to subrecipients

What Are <u>Eligible</u> Operating Expenses?

Examples include (but are not limited to):

- Wages and benefits
- Fuel
- Materials and supplies
- Contracted services
- Overhead costs
- Special transportation services for persons with disabilities
- Indirect costs (must have an approved cost allocation plan or be eligible for the *de minimis* rate)



Eligible Expenses COVID-19 Relief Programs

- Expenses incurred on or after January 20, 2020
- Preventive maintenance (which may be considered an operating expense)
- Existing operations and maintenance service contracts awarded prior to January 20, 2020, even if those contracts were not procured according to federal procurement requirements
- Administrative leave for operations and maintenance employees



Eligible Expenses COVID-19 Relief Programs

- Operating costs of essential delivery services, including meal delivery, from January 20, 2020 through January 20, 2022
- Non-refundable costs incurred for events, travel, or other activities approved in an FTA award that was cancelled due to COVID-19
- Operating portion of the capital cost of contracting for all expenses incurred after January 20, 2020



Eligible Expenses COVID-19 Relief Programs

- Purchases necessary to continue operations in the present emergency [such as laptops, remote secure access (RSA), printers, etc.]
- Bonus or incentive compensation when the overall compensation is reasonable and paid or accrued based on an agreement entered into before the services were rendered
- Questions regarding the incidental use flexibilities should be directed to your FTA Program Manager



What Are Ineligible Costs?

Examples include (but are not limited to):

- School bus operations
- Charter bus operations (exception under the Emergency Relief Program)
- Entertainment expenses
- Fines, penalties, or charitable donations



What Are Ineligible Costs?

Examples include (but are not limited to):

- Expenses for contingencies such as contributions to a capital reserve fund
- Depreciation accrued on facilities and equipment acquired with federal, state, or local funds
- Interest expense on long-term borrowing and debt retirements



Ineligible Expenses COVID-19 Relief Program

Program funds <u>cannot</u> be used to:

Reimburse lost revenue except through claiming eligible
operating expenses

	March 1-31,2019	March 1-31, 2020
Eligible Operating Expenses	\$100,000	\$100,000
Farebox Revenue	(\$20,000)	(\$5,000)
Net Project Cost	\$80,000	\$95,000
FTA Share	\$40,000 (50%)	\$95,000 (100%)
	Pre-COVID Award	CARES Act Award

Ineligible Expenses COVID-19 Relief Program

Program funds <u>cannot</u> be used to:

Reimburse operating expenses already reimbursed by a federal award

... and a reminder...

At least one percent of COVID-19 relief funds apportioned through the Section 5307 program must be used for public transportation security projects, or the recipient must certify that the expenditures are unnecessary

Sample Operating Expense Worksheet

Let's look at Appendix C to FTA C. 9030.1E – Urbanized Area Formula Program

For the Period: <u>March 1, 2021 – March 31, 2021</u> Public Transportation Operator(s): <u>Metropolitan Transit Authority</u> Applicant: <u>Metropolitan Transit Authority</u> Designated Recipient: <u>Metropolitan Planning Organization</u>

(A) Total Operating Expenses (Itemize)

Wages & Benefits	\$ <u>60,000</u>
Fuel	\$_12,000
Parts & Supplies	\$ <u>10,000</u>
Overhead Costs	\$ <u>18,000</u>

TOTAL OPERATING EXPENSES





Sample Operating Expense Worksheet

(B) Less Eliminations

(1) Less Ineligible Expenses (Itemize)

Depreciation\$ 6,000Capital Reserve Fund Contribution\$ 4,000

(2) Less Nonpublic Transportation Expenses (Itemize)

(3) Less Revenue/Offset items (Contra-Expenses) (Itemize)

Earned Interest	\$ <u>1,000</u>
Insurance Claims	\$ <u>14,000</u>

(4) Less Other Exclusions (Itemize)
(e.g., costs already attributed to preventive maintenance)

TOTAL ELIMINATIONS



Sample Operating Expense Worksheet

(C)	Eligible Operating Expenses	\$ <u>75,000</u>	(3)(Line 1 – Line 2)
(D)	Less Farebox Revenues	\$_5,000	_(4)
(E)	NET PROJECT COST (Line 3 – Line 4)	\$ <u>70,000</u>	_(5)
(F)	Local Share (Itemize)		
<u>NA -</u>	- CARES Act Award \$ \$ \$ \$ \$		
	·	\$	_(6)
(G)	Net Expenses Before Applying FTA Funds (Line 5 – Line 6)	\$ <u>70,000</u>	_(7)
(H)	Maximum FTA Share	\$_70,000	_(8)
(I)	FTA Funds Requested (This amount must not exceed line 6)	\$ <u>70,000</u>	_ (9)

Sample Operating Expense Worksheet What Are Contra-Expenses?

Contra-expenses are revenue items that directly offset transit expenses and therefore, must be removed – examples include:

- Earned interest
- Proceeds from the sale of equipment in excess of the depreciated value
- Cash discounts and refunds
- Insurance claims
- Reimbursements that directly offset accrued liabilities

At a minimum, the ECHO draw documentation must contain:

- Evidence that the recipient's designated ECHO approving official (or their written designee) approved the draw
 before it was made in the ECHO system
- Evidence that the person that prepared the ECHO draw was not the recipient's ECHO approving official or designee
- Evidence that the person who made the ECHO draw was not the recipient's ECHO approving official or designee

At a minimum, the ECHO draw documentation must contain:

- The underlying transaction amount
- Expenses that are reasonable, allowable, and charged to the correct Activity Line Item (ALI)
- Evidence that contra-expenses, farebox revenue, and local share were deducted from eligible expenses
 - Local share deduction not required for COVID-19 relief program awards

At a minimum, the ECHO draw documentation must contain:

- The correct indirect cost rate, when applicable
- Evidence that the correct federal share was drawn, although with the COVID-19 relief programs, federal share is 100%
- Evidence that expenses were incurred prior to the ECHO draw unless the federal funds will be disbursed in 3 business days



For operating expenses, common types of underlying transaction documentation are:

- Payroll reports
- Time and attendance reports
- Detailed General Ledger reports
- In-kind charges

Although more likely to be used for capital expenses, other types of underlying transaction documentation are:

- Paid invoices
- Copies of checks

Let's look at a real FTA recipient's ECHO draw documentation

ECN:	Me	essage No:	1248153784	Req.	No: 2	
Recipient Name:						
Requestor:			Phone No:			
Approving Officia	1:					
Request Date/Time	02/02/20	21 14:56:24				
Request Total:	\$1,746,7	17.00				
TrAMS Grant:			Project Number:			
PO Number	Scope	Suffix	Request	Amount	Return	Amount
	300	A1	\$1,746	,717.00		\$0.00

To:	, General Manager
From:	, Finance Manager
Date:	February 01, 2021
Subject:	ECHO Draw Down of Funds

Attached is a form that requires your signature, the form authorizes me to request reimbursement from the Federal Transit Administration (FTA) via their ECHO system. I am requesting reimbursement of \$1,746,717 of federal operating assistance (1996)) for fiscal year 2020-21 quarter 1. This drawdown will partially utilize funds on the FTA 1996 Section 5307 CARES Act Operating Assistance grant.

ECHO P	FTA MENT REQUES	ST FORM		
ECHO CONTROL NUMBER: REQUEST NO: RECIPIENT'S NAME: APPROVING OFFICIAL: TOTAL AMOUNT CLAIMED: \$ 1.946,7 PROJECT NO. AMOUNT MARK IF CR	() PROJE	DATE: B.O.H.: TEL. NO. CONTACT: CT NO.	2/01/ 15,50 AMOUNT	
Signature of Authori	ng Official	21	12) Date	

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CFDA	Federal Award ID Number	Beginning	Drawdowns	Remaining	Current	New Grant	Year	1
or bA		Grant Total	to Date	Balance	Drawdown	Balance	Tour	1
	GL-2018-321-00	\$6,084,394	\$3,876,542	\$2,207,852	\$0	\$2,207,852	2018	
	GL-2020-123-00					\$13,360,550	2020	
						-		
	Totals:	33,915,384	\$16,600,265	\$17,315,119	1,746,717	15,568,402		Cross Checks Should Equal: \$0
					Cross Chec	\$0		
								(Available - (Unobligated + Unligidated))
	1. Enter c	urrent drawd	own figure					\$0
	2. Enter blue figure on ECH	O Form in "B	alance on Ha	nd (BOH)" s	pac			
	3. Enter green figure on ECHC) Form in "TC	TAL AMOUN	T CLAIMED	" spac			Drawdowns to Date + Current Drawdown
								\$0

Updated & Reconciled to TEAM and/or ECHO:

Grant #	Project Description	Awarded	Drawdowns	Available	Unobligate	Unliquidate	Project	ALI#	Comments
			(All)		d	d	Status		
GL-2018-321-0	00								
	(13) Replacement 40ft Buses -	\$5,652,50	\$3,461,05	\$ \$2,191,44	r \$0	\$2,191,44	Active	11.12.01	Section 5339(b)
	9 Diesel, 4 Electric								
	Mechanic technical training for	\$28,405	\$12,000	\$16,405	\$0	\$16,405	Active	11.71.11	Section 5339(b)
	the replacement buses								
	(1) Replacement 40ft Buses -	\$403,489	\$403,489	\$0	\$0	\$0	Complete	11.12.01	Section 5339(a)
	Diesel	•••••	• • • • • • • • •	••					
	Sub Total (GL-2018-321-00)	\$6,084,394	\$3,876,542	\$2,207,852	\$0	\$2,207,85	2		
GL-2020-123-	0 Section 5307 CARES Act	\$16,390,496	\$3,029,946	\$13,360,55) \$0	\$13,360,55	Active	30.09.08	Section 5307
	Operating Assistance								Current Drawdown
	Grand Total:	\$33,915,384	4 \$18,346,982	\$15,568,40	2 \$0	\$15,568,402	2		



Income Statement - First Quarter 2020-21

July 1, 2020 – September 30, 2020

REVENUES	
Operating Revenue	
Cash Fares	5.00
Day Passes	12.00
10-Day Ride Passes	1,863.00
Monthly Passes	 52.00
Total Operating Revenue	\$ 1,932.00
Non-Operating Revenue	
Advertising on Buses	68,420.70
Interest on Investments	19,299.68
Miscellaneous Revenue	733.34
Overpass Property Revenue	546.14
Total Non-Operating Revenue	\$ 88,999.86
State and Local Assistance	
Local Operating Assistance	2,249,626.25
State Operating Assistance	—
Property Tax Assistance	596,781.92
Total State and Local Assistance	\$ 2,846,408.17
Federal Assistance	
FTA – Operating Assistance	1,479,177.00
FTA CMAQ Operating Assistance	_
Total Federal Assistance	\$ 1,479,177.00
TOTAL REVENUES	\$ 4,416,517.03

EXPENSES

Labor Expenses	
Scheduled Labor	1,491,096.97
Scheduled OT	80,102.71
Unscheduled OT	31,536.12
Supervisors	352,483.77
Mechanics	174,171.60
Less Mechanic Capital Labor	<mark>(14,537.89)</mark>
General Staff	348,865.91
Administration	 299,451.72
Total Labor Expenses	\$ 2,763,170.91
Fringe Benefits	
FICA	234,074.90
Pension	321,524.09
Health Insurance	758,574.31
Sick Pay	61,137.21
Vacation	195,927.99
Holiday Pay	79,979.09
Other Pay	12,735.36
Unemployment Insurance	401.84
Uniform Allowance	10,045.25
Tool Allowance	 1,100.00
Total Fringe Benefits	\$ 1,675,500.04



Services		
Medical & Driving Exams		9,317.80
Professional Services		184,904.43
Insurance		170,265.72
Liability & Incident Payouts		133,247.07
Less Accident Reimbursements		<mark>(1,657.78)</mark>
Maintenance & Repairs		143,975.45
Advertising & Marketing		24,116.83
Paratransit Services		250,389.99
Training, Travel & Meetings		580.00
Miscellaneous Services		14,686.51
Mandated Fees & Permits		5,562.67
Total Services	\$	935,388.69
Materials		
Fuel & Lubes		403,810.14
Electric Bus Power		6,550.92
Tire Lease		22,039.62
Parts & Supplies		197,067.31
Office Supplies & Computers		5,924.87
Dues & Subscriptions		9,725.02
Miscellaneous Expenses		7,141.91
COVID-19 Expenses		65,409.12
Total Materials	\$	717,668.91
Utilities	\$	71,668.91
TOTAL EXPENSES	\$	6,163,234.88
LESS REVENUES	\$	(4,416,517.03)
NET PROJECT COSTS	\$	1,746,717.85
FTA Share 100% (CARES Act Award)		
TOTAL ECHO DRAW	<mark>\$</mark>	<mark>1,746,717.85</mark>

ECHO Draw Best Practices

- Include the Operating Expense Worksheet (or a similar form) with each ECHO draw for operating assistance
- Include a cover sheet, memo, or simple form that summarizes the draw
- Include the ECHO system confirmation so the FTA reviewer can identify the ECHO approving official
- Include detailed General Ledger reports, not a copy of an approved budget



ECHO Draw Best Practices

- Include documentation that demonstrates the exact dates the expenses were incurred
- Ensure the correct people within your agency are assisting with the calculation of operating expenses
- Make draws for operating expenses regularly (i.e., monthly) to reduce the amount of documentation that must be included with each draw



ECHO Draws – DO NOT

- Have the ECHO approving official sign and date the ECHO draw documentation *after* the draw is completed
- Draw down funds before expenses have been incurred unless you are absolutely certain those expenses will be incurred within 3 business days
- Complete one draw for the entire award amount since the level of documentation required may be overwhelming, and there is a greater likelihood of missing eligible expenses



Oh No! I Made a Mistake – What Now?

- Don't panic!
- If it has been <u>more</u> than 3 business days since you made the ECHO draw, <u>do not</u> make adjustments in the ECHO system or return funds; <u>instead</u>, contact your FTA Program Manager
- Your FTA Program Manager will work with you to determine the correct course of action
- Once adjustments have been made in the ECHO system, remember to report the adjustments in your next Federal Financial Report (FFR)



Additional Resources

Frequently Asked Questions from FTA Grantees Regarding COVID-19 | FTA

Frequently Asked Questions for FTA Tribal Transit Recipients on COVID-19

FTA Circular 9030. IE - Urbanized Area Formula Program

FTA Circular 9040. IG Formula Grants for Rural Areas

FTA C. 9070.1E - Enhanced Mobility of Seniors and Individuals with Disabilities

2 CFR 200.405 - Uniform Guidance (Allowable Costs)



Questions and Answers



Thank you!

This session has been recorded and will be posted on FTA's website

