

GUIDE: NATIONAL TRANSIT DATABASE (NTD) REPORTING AND COVID-19

Reporting changes resulting from the pandemic in Report
Year 2020 and beyond (Version 1.3)

The contents of this document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies. Grantees and subgrantees should refer to FTA's statutes and regulations for applicable requirements.

Version	Date	Update
1.0	03 August 20	Initial publication
1.1	14 October 20	Added notice to beginning of document.
1.2	27 October 20	Updated guidance regarding Extraordinary and Special Items.
1.3	March 21	Updated guidance regarding use of NTD data for apportionments.

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Transit agencies reporting to the NTD have been affected by the Coronavirus Disease 2019 (COVID-19) pandemic beginning in Fiscal (Report) Year 2020. COVID-19 has impacted several aspects of data collection and reporting, which may affect data availability or data quality.

FTA recognizes the challenges that agencies are now facing. In addition to answering questions regarding NTD Reporting found in the [FAQ from FTA Grantees Regarding COVID-19](#), FTA has produced this reference document to help your agency meet the NTD reporting requirements during this public health emergency. This document provides guidance on the following key data collection and reporting issues that result:

- Understanding How NTD Data Will be Used for Funding
- Collecting and Reporting Service Consumed Data
- Reporting Changes in Service Supplied
- Reporting Expenses Related to COVID-19
- Reporting Employee Data
- Reporting Condition Assessments

Understanding How NTD Data Will Be Used for Funding

FY 2021

Funds apportioned for the 2021 Federal fiscal year (FY) (beginning October 1, 2020) are based on FY 2019 agency data reported to the NTD. FTA has the necessary data to apportion FY 2021 funds.

FY 2022

On March 13, 2020 a nationwide emergency was declared; all 50 states, the District of Columbia, and 5 territories were approved for major disaster declarations for COVID-19. For apportionment for FY 2022, FTA will implement the following procedure:

1. FTA will use your data from either the 2019 or 2020 National Transit Database Annual Report

2. By default, FTA will use all data from whichever Report Year has the higher reported agency total Vehicle Revenue Miles (VRM)

FTA does not guarantee a positive outcome for all UZAs, nor does it guarantee an increase in apportionment to an Urbanized Area (UZA), State, or Tribal Area from the prior year (FY 2021) apportionment by using these procedures. You do not need to request that FTA use the year with higher VRM in its FY 2022 apportionment, as FTA will apply this procedure automatically for every NTD Report.

The year in which your total reported VRM is higher is your *default year*. For example, for purposes of the FY 2022 apportionment, if you reported more VRM to the NTD in 2019 than in 2020, then your default year is 2019. Likewise, if your default year is 2019, then your *alternative year* is 2020.

FY 2023

For the FY 2023 formula apportionment, FTA will automatically use either all of your 2019 or all of your 2021 data, whichever has the higher reported agency total Vehicle Revenue Miles (VRM). This may change your *default year* and *alternative year* for purposes of the FY 2023 apportionment. FTA will calculate your *default year* and *alternative year* separately for each year's apportionment.

Requesting Use of Lower VRM Year Data

For most urbanized areas and rural areas, vehicle revenue miles is the most important transit data factor in the calculation of formula apportionments. However, there are other transit data factors used in certain formulas, including the following:

- Fixed Guideway (FG),
- Directional Route Miles (DRM),
- FG VRM,
- State of Good Repair FG DRM,
- State of Good Repair High Intensity DRM,
- State of Good Repair High Intensity VRM, or
- VRM increasing in one UZA but decreasing in another,

FTA will examine each of the above six factors to determine if any of were higher in your alternative year than in your default year. If any of the above were higher in your alternative year than in your default year, then FTA will contact you. You will then be asked to confirm using your default year data in the apportionment.

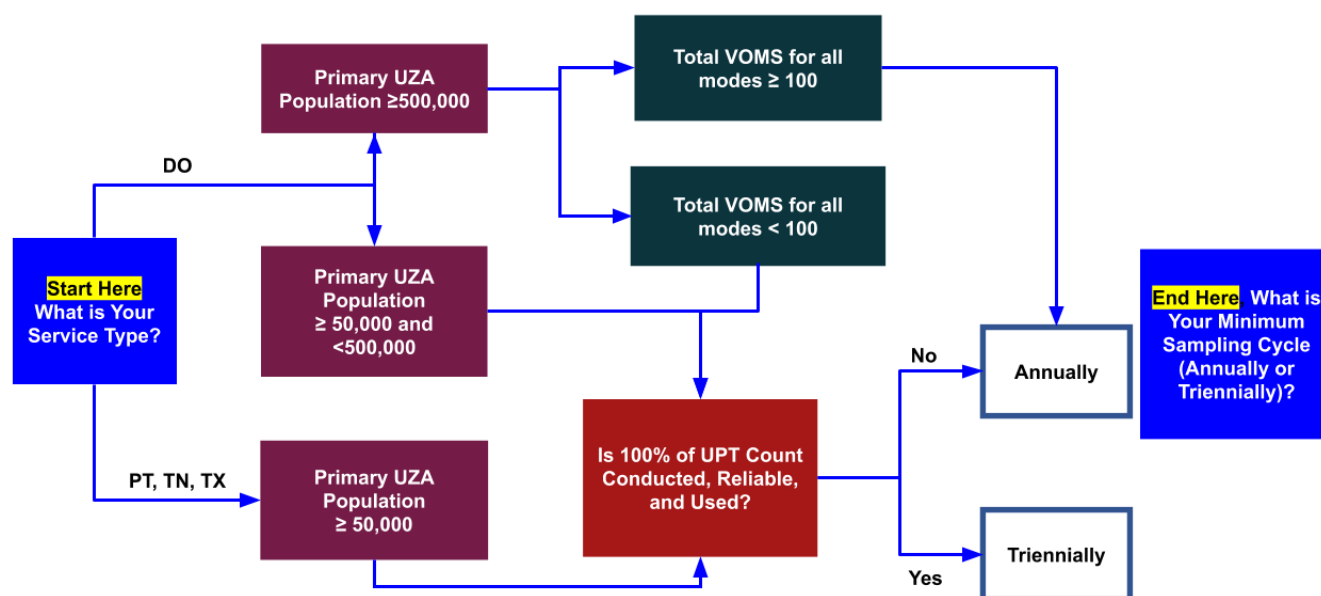
Agencies that receive this prompt may or may not earn greater formula funding by requesting that FTA use your alternative year data instead of your default year data.

You may request that FTA use the alternative year data at your discretion, whether you receive a prompt from FTA or not. To request that FTA use your alternative year data, submit a letter to your NTD analyst, on agency letterhead and signed by your CEO, stating that you would like FTA to use all data from the alternative year in the apportionment. No action is needed for FTA to use your default year data.

Collecting and Reporting Service Consumed Data

On March 25, 2020, FTA requested that agencies suspend their sampling activities for NTD reporting purposes if those activities involved onboard data collectors or “ride-checkers.” If your agency did suspend sampling activities, your reporting approach will depend on how often FTA requires sampling. You can determine your agency’s minimum required sampling cycle by consulting the table below. Please consult the NTD reporting manual for the definitions of terms found in this diagram.

Exhibit 1: Determining Sampling Frequency

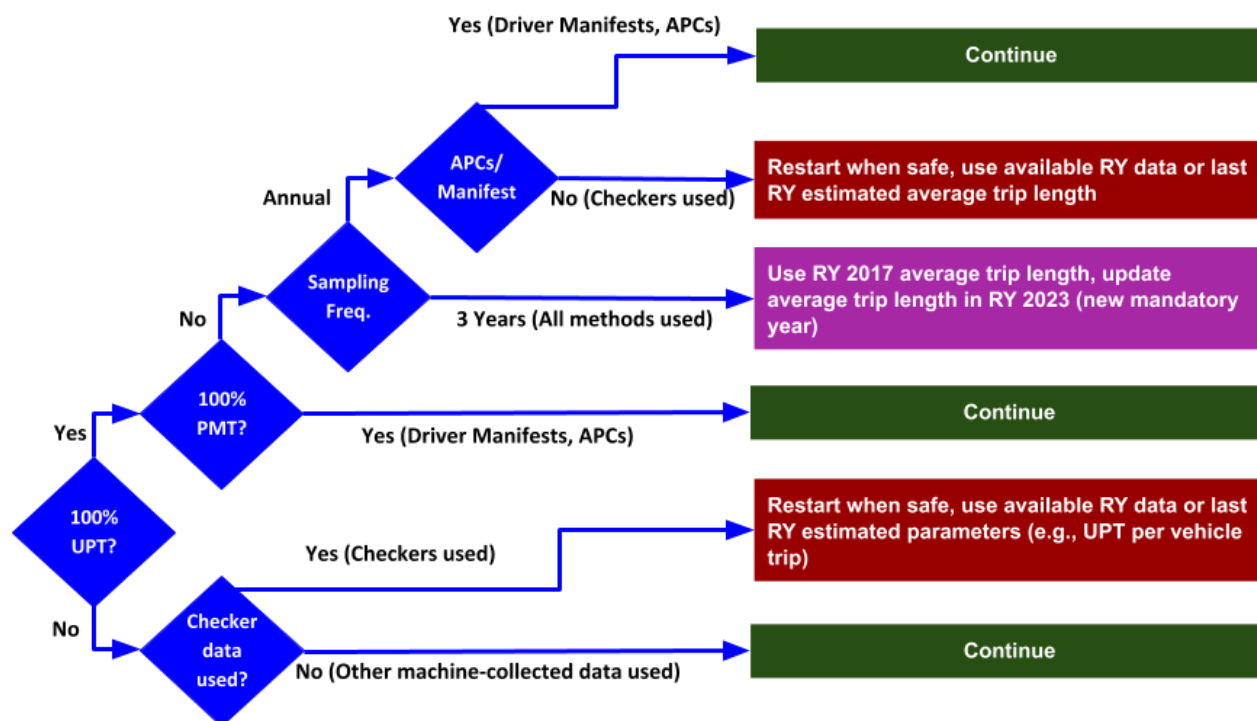


FTA amended the sampling requirement for Report Year 2020 with the following objectives in mind:

- Prioritize the safety of operators, other employees, and passengers.
- Consider the need for accurate, recent service consumption data.
- Prevent a penalty to any urbanized areas, no matter their reporting frequency (see the section *Understanding How NTD Data Will be Used for Funding* above).

Please see the below flowchart which illustrates the updated FTA sampling requirements for Report Year 2020 and beyond.

Exhibit 2: Report Year 2020 Service Consumed Data Collection Requirement



Triennial Sampling Requirement

Per the triennial sampling requirement, 2020 was a mandatory sampling year. FTA has waived the sampling requirement for Report Year 2020 for all agencies with this sampling frequency. To estimate passenger miles traveled (PMT) in your 2020 NTD Annual Report, please use the average passenger trip length from 2017, or from your most recent past-year sample. The next mandatory sampling year will be in Report Year 2023.

Annual Sampling Requirement

If your agency is required to sample annually, you should estimate your agency's PMT using the best available data for Report Year 2020. Please contact your assigned NTD analyst to discuss the method you plan to use if your agency cannot follow its normal sampling approach.

Impact Based on Methods for Data Collection

If ride checkers normally sample for your agency, resume that sampling approach when your agency determines that it is safe. If your agency uses a machine collection method for unlinked passenger trips (UPT) or PMT—such as a registering farebox or automated passenger counter, or if your vehicle operators record ridership and are still able to do so safely—please continue to collect this data. (This includes using one of those methods to sample data.)

If your agency moved to rear-door boardings for safety and could not collect UPT or lost some UPT data as a result, please contact your NTD analyst to communicate the scope of the issue and discuss potential remedies. You should also discuss with your analyst any concerns regarding incompleteness of average passenger trip length sampling for new services (modes or routes). There may be cases in which no Average Passenger Trip Length data are available for a new service as a result of the ongoing public health emergency. In this case, please provide your analysts with the relevant detail and plan to discuss an alternative, statistically appropriate estimating procedure.

Reporting Changes in Service Supplied

Service Reductions

Many agencies have reduced service during the COVID-19 pandemic.

Full Reporters that are operating reduced schedules should calculate their average weekday, Saturday, and Sunday data to represent an average over the entire fiscal year. Include both the normal period (before and after the national emergency was declared) and the abnormal period of reduced service (during the pandemic) in the calculation of each schedule. This means the agency will report a normal number of days operated in each period, though average data for each would be reduced.

If a mode is not operated at all during part of the pandemic period, record the number of days that the mode was not operated under Days Not Operated (S-10 form).

Accommodating Social Distancing in Revenue Service

Some transit agencies have instituted a social distancing policy on their transit vehicles. Riders are encouraged to seat themselves or stand six feet apart from other passengers. This type of policy has reduced the effective capacity of transit vehicles. Some agencies are restricting passenger loading and/or requiring operators to prevent admitting additional passengers until others alight the vehicle.

Seating and Standing Capacity

Agencies implementing this type of reduced vehicle capacity policy have asked if seating and standing capacities on the A-30 Revenue Vehicle Inventory form need to be revised to reflect the temporary capacity changes made in response to COVID-19.

Do not update values for the Seating Capacity and Standing Capacity for existing fleets in the Revenue Vehicle Inventory to reflect any temporary capacity changes made in response to COVID-19. Similarly, for vehicles added to fleets during the year, agencies should report seating and standing capacity as they would have per normal operating standards (e.g., before COVID-19).

Temporarily Restructured Ridesharing Services

FTA requires agencies to provide shared rides for the service to be considered public transportation. Many vanpool and other ridesharing services have limited the number of passengers allowed in the vehicle at one time as a safety measure during the ongoing public health emergency. Therefore, agencies may still report public transportation services even if a single passenger is permitted on the vehicle at a time during the emergency, assuming the service otherwise meets the definition of public transportation.

“Doubleheading” Vehicles

When transit agencies notice that crowded vehicles are passing by passengers on the same trips every day, the agency schedules a “doubleheader” vehicle or “shadow service” for those trips. This means that a second vehicle is added to operate in tandem with the scheduled vehicle. Passenger timetables remain unchanged. The only difference is that two vehicles, instead of one, arrive at the scheduled times on the route.

If your agency uses doubleheader vehicles because you anticipate needing extra capacity on a route on a regular basis, report the miles and hours traveled by those vehicles along the assigned route as **revenue service** in your agency’s monthly and annual reports. Revenue service begins when the doubleheader vehicle starts its route service, even if passengers do not board the shadow vehicle until a later point in the route. You should also report the associated deadhead hours and miles for these buses as part of vehicle hours and miles in the annual report.

Similarly, if doubleheader vehicles are dispatched daily, as capacity concerns arise in real time, you should report the miles and hours those vehicles spend in route service in your agency’s monthly and annual reports. Report the associated deadhead hours and miles for these buses as part of the vehicle hours and miles in the annual report.

Floater Vehicles

Sometimes transit agencies will use “floater” vehicles to provide immediate response to problems relating to passenger capacity and breakdowns. These agencies station floater vehicles (typically buses, for fixed-route systems) at selected locations in their service areas away from their garages and parking areas. Transit agencies will dispatch the floater vehicle(s) to restore service where breakdowns have occurred and to address passenger overloads on selected routes.

If a floater vehicle is dispatched to provide immediate response to accommodate vehicles that have reached capacity, you should report the miles and hours those vehicles spend in route service as revenue service in your agency’s monthly and annual reports. Report the associated deadhead hours and miles (e.g., before arriving at its first stop) for these vehicles as part of the vehicle hours and miles in the annual report.

If a floater vehicle is not dispatched to provide immediate response to a breakdown and/or a passenger capacity problem, you should not record or report any miles or hours operated by the floater buses. FTA does not consider the miles and hours spent traveling to and from the stationing locations by the floater buses as reportable miles and hours, because these vehicles did not provide revenue service.

Emergency Services

You should not report emergency services provided by your agency unless these services meet the statutory definition of public transportation. Typically, emergency services carried out by transit operators in coordination with medical centers or emergency management agencies in response to COVID-19 do not meet the FTA definition of public transportation. Likewise, services that your agency provides under contract, which do not involve the transport of passengers, (such as a meal delivery program), do not meet the FTA definition of public transportation.

For example, some transit systems have used their vehicles to provide wi-fi hotspots for educational purposes. Miles traveled by a vehicle for this purpose (or for meal delivery) are treated the same as maintenance and training miles. These miles are excluded from the *total miles* reported on the Service form (S-10). They are neither *revenue miles* nor are they *deadhead miles*. These miles are included, however, as total miles for the vehicle on the Revenue Vehicle Inventory form (A-30).

If your agency provides emergency services that you believe may be reportable, please contact your assigned NTD analyst to discuss the reporting eligibility of these services.

Reporting Expenses Related to COVID-19

The public health emergency presents challenges in accounting and reporting expenses to the NTD.

FTA provided initial guidance in a previous version of this guide stating activities undertaken in response to the COVID-19 public health emergency were to be reported as Extraordinary and Special Items (E&S) on the Reconciling Items form (F-40). The Uniform System of Accounts defines **Extraordinary items** as “events or transactions that are distinguished by their unusual nature **and** by the infrequency of their occurrence” where **Special items** are “events or transactions that are either unusual in nature or infrequent, but not both.”

However, FTA is clarifying that Full Reporting agencies may either report COVID-19-related expenses as E&S **OR** as ordinary modal operating expenses. Agencies may report directly traceable COVID-19-related expenses in the appropriate field and allocate shared costs using an allocation model.

For example, agencies may have varying levels of Personal Protective Equipment, hand-sanitizer, barriers, and other items that may be directly linked to a particular mode or type of service. If so, you may report these expenses on the F-30 form for the appropriate mode. However, if your agency prepared to account for (or already reported) these expenses in the NTD as E&S based on previous guidance, you may continue to do so for Report Year 2020.

Reduced Reporters and Rural Reporters, if possible, should include COVID-19-related expenses in Funds Expended on Operations by Mode and Type of Service. If you already prepared to account for (or already reported) these expenses in the NTD as E&S based on previous guidance, you may exclude these expenses from Funds Expended on Operations by Mode and Type of Service. However, you must include the costs in the appropriate category under Sources of Revenue Expended.

FTA recognizes that it is highly unusual to allow multiple reporting mechanisms for expenses. FTA will provide more uniform reporting guidance for Report Year 2021.

The sections below review possible COVID-19-related expenses.

Health & Safety Expenses

Most transit agencies have responded to the COVID-19 pandemic by taking action to prevent the spread of the virus on transit vehicles and property. Examples of these actions include the following:

- Extra cleaning of vehicles and facilities
- Providing personal protective equipment, such as face masks and gloves
- Installing sanitizer stations
- Public messaging such as signs, videos, and online messages

As stated above, for Report Year (RY) 2020, FTA allows agencies to report these expenses on as Extraordinary and Special Items on Form F-40 or as regular operating expenses on Form F-30.

Financial Support of Agency Employees

Many agencies have taken additional measures during the pandemic, such as

- Furloughing employees with pay, partial pay, and/or benefits;
- Providing additional death benefits to families of employees who died from COVID-19;
- Placing more operators on the extra-board than would typically be needed for the level of service provided (e.g., to meet specific agency policies); and
- Providing extra benefits to employees, such as additional sick leave.

As stated above, for RY 2020, FTA allows agencies to report these expenses on as Extraordinary and Special Items on Form F-40 or as regular operating expenses on Form F-30.

Indirect Expenses

Your agency may incur additional, COVID-19 related indirect or overhead expenses separately from the direct expenses described in the sections above. Examples of indirect expenses include support provided by finance and human resource departments and oversight provided by general management.

As stated above, for RY 2020, FTA allows agencies to report these expenses on as Extraordinary and Special Items on Form F-40 or as regular operating expenses on Form F-30.

Reduced Revenues

Agencies are observing much lower ridership, and many are experiencing reduced revenue streams during the pandemic. Many agencies have stopped collecting fares due to safety concerns.

Reduced revenues are not considered an expense for NTD reporting. Do not report the estimated reduced revenues for your agency as an expense in the Operating Expense Forms (F-30) or in the Extraordinary and Special Items Form (F-40).

Reporting Employee Data

Full Reporters should use the R-10 form to report employee work hours and head counts for directly operated modes. Hours spent working on activities that are considered Extraordinary and Special Items, as described above, should be included on the R-10 only if they were included on the F-30. Include a count of all employees at fiscal year-end as you would during a normal year. Include furloughed employees in this count.

Reporting Condition Assessments

FTA recognizes that the condition assessment required for facilities covered by the Transit Asset Management (TAM) rule and reported on the TAM Facilities Inventory form (A-15) may have been delayed during this time. Therefore, FTA is waiving the requirement to inventory 3/4 of all facilities in FY 2020. The exhibit below identifies the updated phase-in schedule for this aspect of TAM.

Exhibit 3: Updated Asset Inventory Module Requirement Schedule

NTD Report Year	Set Internal Performance Measure Targets	Report Condition Assessment - Facilities
RY 2019	Required (for FY 2020)	2/4 Required
RY 2020	Required (for FY 2021)	2/4 Required
RY 2021	Required (for FY 2022)	4/4 (All) Required