

# CRRSAA GRANT-MAKING TOOLKIT | FEDERAL TRANSIT ADMINISTRATION

Before compiling your TrAMS application, please review the language of the Coronavirus Response and Relief Supplemental Appropriations Act of 2021 (CRRSAA, Pub. L. 116-260, December 27, 2020) and applicable Federal Transit Administration (FTA) Circulars (<https://www.transit.dot.gov/regulations-and-guidance/fta-circulars/final-circulars>, specifically C9030.1E, C5010.1E, C9040.1G, and C9070.1G). You also may review resources available on FTA's website (<https://www.transit.dot.gov/coronavirus>), which include COVID-19 FAQs, for additional guidance.

This grant-making toolkit is a general reminder of the items that FTA reviewers might look for in CRRSAA applications and applications for Coronavirus Aid, Relief, and Economic Security (CARES) Act funding unobligated as of December 27, 2020. FTA may request additional information and documentation depending on each application and its specific requirements. The contents of this document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies. Recipients and subrecipients should refer to FTA's statutes, regulations, and Circulars for applicable requirements.

## **GENERAL NOTES:**

- Recipients should apply for CRRSAA funds through a stand-alone TrAMS application, separate from CARES Act and other non-CRRSAA funding applications.
- For more information regarding changes and differences between the CARES Act and the CRRSAA, please see FTA's [COVID-19 FAQs](#) on the above referenced website.
- The Emergency Relief Docket (FTA-2021-0001 at <https://www.regulations.gov/docket?D=FTA-2021-0001>) is open and available for requests for relief from FTA statutory and administrative requirements of Sections 5307, 5311, and 5310 funding in States that have declared an emergency or the President has declared a disaster. Grant recipients should discuss the need for a waiver with the FTA regional office prior to submitting a request to the Docket. Any waiver requests or approvals from FTA requirements should be referenced in the grant application.
- To the maximum extent possible, CRRSAA funds shall be directed to payroll and operations of public transit (including payroll and expenses of private providers of public transportation), unless the recipient certifies to FTA that the recipient has not furloughed any employees within the agency under the Federal Fiscal Year (FFY) 2021 Certifications and Assurances. Recipients are responsible for ensuring that payments of CRRSAA funds to subrecipients are consistent with this requirement and that the FFY 2021 Certifications and Assurances are properly certified.
- FTA will reimburse any actual, eligible expenses incurred on or after January 20, 2020, which is the date that the public health emergency was declared, including eligible expenses that may have otherwise been offset by lost revenue. This includes all expenses normally eligible under Urbanized Area Formula Grants (Section 5307), the Formula Grants for Rural Areas Program (Section 5311), or the Enhanced Mobility for Seniors and Individuals with Disabilities Program (Section 5310) that occurred on or after January 20, 2020, at a 100% Federal share.
- All net operating expenses (after subtracting fare revenues from the eligible operating expenses) are eligible under Section 5307, Section 5311, and Section 5310, for all recipients in large urban,

small urban, and rural areas that are incurred on or after January 20, 2020, including the following:

- Provision of transit service, including but not limited to:
    - Drivers and other operations worker salaries;
    - Fuel; and
    - Supplies (including personal protective equipment and cleaning supplies).
  - Administrative leave for operations employees (including employees performing maintenance). Administrative leave is an administratively authorized absence from duty without loss of pay or reduction in an employee's available leave. In the context of the COVID-19 public health emergency, administrative leave could include, but is not limited to, leave for an employee who is not required to work due to a reduction in service or leave for a worker who is quarantined after potential exposure to an individual infected with COVID-19.
  - Operations and maintenance service contracts for service provided, or to pay for administrative leave of contractor operations or maintenance personnel.
- After reviewing FTA's [COVID-19 FAQs](#), please direct outstanding CRRSAA inquiries to your [Regional Office](#).

## RECIPIENT INFORMATION

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

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

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

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

**SUPPORTING DOCUMENTATION:** Attach all relevant supporting documentation in the Application Documents section. Supporting Documentation may include, but is not limited to, split or suballocation letters, requests and/or approvals of FTA waivers and Program Circular Operating Expense Worksheets used to determine the

amount of eligible operating assistance (e.g., Appendix C of C9030.1E for 5307, [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FINAL\\_FTA\\_circular9030.1E.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FINAL_FTA_circular9030.1E.pdf)). Additional documentation may be requested at FTA's discretion.

## APPLICATION DETAILS

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

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

**APPLICATION TYPE:** Select "Grant."

**APPLICATION EXECUTIVE SUMMARY:** Include FFY 2021 Section 53XX CRRSAA, amount of federal funds being requested, indicating whether for the full apportionment or partial, a brief application description, and types of project(s) included.

First paragraph template: *This is an FFY 2021 Section 53XX CRRSAA application in the amount of \$XXXX, representing X% (up to 100%) federal share of the total eligible amount. This application utilizes CRRSAA funding to prevent, prepare for, and respond to coronavirus. The application scope of work includes [provide a list of projects included in the application].*

The Application Executive Summary should also include:

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

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

- Any remaining balance of federal funds that will be requested in future grants or amendments.
- If the application includes line items that are not directed to payroll and operations of public transit (including the payroll and expenses of private providers of public transit), the Recipient should include one of the following three statements to reflect the requirement at Section 1.5 of the FFY 2021 Certifications and Assurances:

- *The Recipient certifies that it, and its subrecipients and contractors that are providers of public transportation, have not furloughed any employees since March 27, 2020 (the enactment date of the CARES Act); **or***
- *The Recipient certifies that it and any subrecipient or contractor that is a provider of public transportation: (a) are currently not furloughing any employees; (b) have, to the maximum extent possible, brought back any employees previously furloughed as a direct result of financial challenges caused by the COVID-19 public health emergency; and (c) have rehired, or posted to rehire, any positions of employees who were laid off as a result of financial challenges caused by the COVID-19 public health emergency; **or***
- *The Recipient certifies that it and any subrecipient or contractor that is a provider of public transportation: (a) intend, to the maximum extent possible, to use CARES Act or CRRSAA funds to bring back any employees previously furloughed as a direct result of financial difficulties caused by the COVID-19 public health emergency; (b) intend to use CARES Act or CRRSAA funds to rehire any positions of employees who were laid off as a direct result of financial challenges*

*caused by the COVID-19 public health emergency; and (c) will explain how they have spent CARES Act or CRRSAA funds on payroll, operations, or payroll and expenses of private providers of public transportation “to the maximum extent possible.”*

- A certification that:

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

- If applicable, the Executive Summary should identify subrecipients funded through the grant application and the projects being implemented by each subrecipient.
- A statement highlighting whether any projects in the application lead to a functional, location, or capacity change. If not, include:

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

If a project involves a functional, location, or capacity change, include:

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

- If using 3<sup>rd</sup> party contractors, please add the following:  
*“[Recipient name] will follow all 3rd party procurement policies as defined in C4220.1F (Third Party Contracting Guidance).”*  
*“[Recipient name] will ensure contractors procured will not be on the FTA Suspension and Debarment list.”*

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

**PERIOD OF PERFORMANCE END DATE:** Select date by which all activities are expected to be complete and no further costs incurred. The Period of Performance End Date should be set to the next March 30<sup>th</sup>, a minimum of two years beyond the latest milestone. For example, if the latest milestone is 12/20/22, the Period of Performance End Date would be 3/30/25.

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

**PRE-AWARD AUTHORITY:** The Pre-Award Authority start date for CRRSAA funding is January 20, 2020. If pre-award authority is utilized, a recipient will be required to prepare an initial Federal Financial Report in TrAMS before grant execution.

**INDIRECT COST RATE:** All recipients must identify whether:

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

or,

- Indirect costs will not be applied to this application.

If your organization's approved Indirect Cost rate will be applied, include the rate information and ensure that either Cost Allocation Plan or Indirect Cost Rate Proposal approval documentation is uploaded in TrAMS in the organization's Recipient Profile. If applying the de minimis rate, please ensure the certification form has been uploaded in TrAMS.

**NOTE:** Indirect costs may be included for capital and operating projects, in accordance with the requirements outlined in the approved indirect cost documentation, including established rates, timeframes, and applicable items of cost. Applicants should identify the rate and amount of indirect costs in the ALI description. Please consult the FTA [Regional Office](#) for additional guidance.

## PROJECT DETAILS AND NARRATIVES

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

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

Considerations for the Project Details section:

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

Also, include: *The Federal share is X% (up to 100%).*

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

**Project Scope.** Describe the scope of work, components, and quantity of capital items funded under this project, as well as a justification for the grant request. Include the useful life of capital components valued over \$5,000 funded in the project.

**Program of Projects.** Private providers of public transportation, who are eligible subrecipients under CRRSAA, should be listed in the Program of Projects in TrAMS, if applicable.

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

For Section 5311 and Section 5310 CRRSAA funds, a State or designated recipient may develop a program of projects consistent with its documented State Management Plan or Program Management

Plan that has been updated to accommodate CRRSAA funds.

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

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

**Intercity Bus.** While States are not required to set aside 15 percent of their 5311 CRRSAA funds for intercity bus service, intercity bus service is an eligible expense under CRRSAA.

**NOTE:** If including funds for intercity bus service in a TrAMS application, add separate ALI(s) in the application budget under Scope 634-00, as you would in an annual formula Section 5311 application.

**Explanation of Expenses.** Explain the approach used to determine requested funding under this project, such as reliance on the most recent year's National Transit Database (NTD) data.

Example: *We developed our request based on the most recent year's NTD data.*

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

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

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

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

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

or

*This project(s) is listed in the FY XXXX-20XX Statewide Transportation Improvement Program (STIP), approved by FTA/FHWA on XX/XX/XXXX. The STIP ID is XXXX (if applicable). This project is referenced in the STIP on page XX, and the reference page is attached in Application Documents.*

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

## BUDGET ACTIVITY LINE ITEMS & MILESTONES

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

- |            |   |
|------------|---|
| 5307       | Urbanized Area Formula Grants (CRRSAA); |
| 5311       | Rural Area Formula (CRRSAA);            |
| 5311(c)(1) | Tribal Formula (CRRSAA); or             |



5310 Enhanced Mobility of Seniors and Individuals with Disabilities (CRRSAA).

**ACCOUNT CLASSIFICATION CODES (ACC)**

Short Code	Program	Account Class Code	Fiscal Year	Appropriation Code	Section Code	Limitation Code
5307-8	Urbanized Area (CRRSAA)	2021. <b>28.90.CR.1</b>	2021	<b>28</b>	90	<b>CR</b>
5311-9A	Rural Area (CRRSAA)	2021. <b>28.18.CR.1</b>	2021	<b>28</b>	18	<b>CR</b>
5311-9B	Tribal (CRRSAA)	2021. <b>28.18.TR.1</b>	2021	<b>28</b>	18	<b>TR</b>
5310-1B	Mobility States (CRRSAA)	2021. <b>28.16.SR.1</b>	2021	<b>28</b>	16	<b>SR</b>
	Mobility 50-200K (CRRSAA)	2021. <b>28.16.MR.1</b>	2021	<b>28</b>	16	<b>MR</b>
	Mobility >200K (CRRSAA)	2021. <b>28.16.LR.1</b>	2021	<b>28</b>	16	<b>LR</b>

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

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

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

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

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

Helpful information might include:

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

**Useful Life.** Please include useful life information for all rolling stock ALIs and capital equipment valued over \$5,000 in the EBD of the applicable ALI. Refer to C 5010.1E for common useful life standards and sources where useful life information of less common assets may be found.

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

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

**Project Management, Force Account, Fleet Management Plans, and Transit Asset Management**

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

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

For **Operations** activities:

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

or

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

**NOTES:** If the operating assistance period overlaps with the operating assistance period in another application (CARES Act or other FTA funding), please list the applicable FAIN(s) and add a statement explaining that the other available funding is insufficient to cover eligible operating expenses within the period.

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

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

For **Preventive Maintenance** activities:

*Preventive maintenance funds will cover expenses from XX/XX/2020 until XX/XX/20XX. Expenses include [provide brief description of costs].*

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

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

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



*after award (actual value and useful life)."*

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

For **Project Administration** expenses:

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

For **State Administration** expenses:

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

For **Program Administration** expenses:

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

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

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

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

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

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

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

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

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

## ENVIRONMENTAL DETERMINATIONS

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

- Operating, planning, and administrative activities will typically fall under Class II(c) – Categorical

Exclusion (C-List), Type 04.

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

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