MULTI-SOURCED FUNDING -- APPLICATION CONSIDERATIONS

November 2017

Definition of a Multi-Sourced Application: A TrAMS application with multiple funding programs included (i.e., Section 5307, Section 5339, Section 5337, etc.)

PRE-AWARD

- Funding sources should be separated into their <u>own TrAMS Projects</u>. For example, Section 5307 in P1, Section 5339 in P2, Section 5337 in P3, etc. Recipients should indicate that the application contains more than one funding source in the name of the application (i.e., "<u>Sections 5307, 5337, 5339 Capital Assistance"</u>) and in the Executive Summary.
- Recipients must ensure eligible scopes/ALIs are funded by the appropriate funding source. For example,
 preventive maintenance may be funded by Section 5307 and 5337 funds but should not be included in the
 TrAMS Project dedicated to Section 5339 funding.
- Recipients should take the length of project timelines into account when considering whether to combine
 funding sources into a single application. For example, please see FTA GUIDANCE FOR CREATING APPLICATIONS
 WITH MULTIPLE FUNDING SOURCES IN TRAMS (SUPER GRANTS) *
 - * Originally posted February 10, 2016, updated July 25, 2016
- <u>DOL:</u> NOTE: If Section 5339 was combined with Section 5311 funding, the entire application would require DOL review and certification, since that is a requirement of Section 5339, even though it is not a requirement for 5311. Please think through the DOL certification process before combining funding sources.
- <u>NEPA</u>: Similarly, because NEPA documentation must be completed prior to application award, the timelines for combining funding for non-construction activities with funding for construction activities* into one application should be carefully considered.
 - *Construction activities include construction, demolition, renovation and rehabilitation projects.
- Projects included in a multi-sourced application should be similar in nature. For example, combining Section 5310 funds for sub-recipients with a transit agency's own Section 5307 funds may not be the best approach. FTA may suggest that these requests be separated into two unique TrAMS applications.

Post-Award

- Applications **cannot** be amended to add a new funding source. This limitation means that a multi-sourced application cannot be created via an amendment. Only those funding sources included in the original application record (-00) may be adjusted in future amendments.
- Recipients cannot transfer funds between TrAMS Projects funded by different funding sources via budget revisions and amendments. Projects funded by different funding sources are treated like separate applications: The existence of a scope is in one Project does not mean that the scope can be added to a different Project via budget revision.
- Reporting: If program funding sources have different reporting cycles (annual vs. quarterly), the more frequent cycle takes precedence.

OTHER CONSIDERATIONS

- When combining funds from different programs, the more stringent program requirements would apply to the entire application.
- <u>Grant Accounting</u>: Recipients must rely on their own accounting systems for multi-sourced and other applications. FTA is not responsible for recipient accounting.
- Ultimately, it is FTA's decision as to whether a Multi-Sourced Application is appropriate for a given activity versus the normal application development process. Recipients should discuss Multi-Sourced Applications with their pre-award manager prior to creation of the application in TrAMS.