Frequently Asked Questions – 2020 CARES Act Funding

Issued 4/21/20

Questions	Response
Can CARES Act funding be used to provide community services such as Meals on Wheels?	Yes. The use of transit vehicles is eligible as an incidental use if the delivery services do not conflict with the provision of transit services or result in a reduction of service to transit passengers. As part of Emergency Relief efforts authorized by 49 U.S.C. 5324, FTA also will permit recipients to use Section 5307/5311 funds administered under the provisions of the Emergency Relief program or CARES Act funds for up to 6-months from January 20, 2020, to pay for the operational costs of such services. In addition, this service is eligible for FEMA's Public Assistance program, and to maximize the funding available to them to respond to the COVID-19 public health emergency, FTA recommends that recipients check with their State Office of Emergency Services to determine whether those resources are available, or to seek reimbursement from the entity requesting the service. A recipient may charge only costs not covered by other entities to an FTA grant.
Will the paid administration leave have to separated out from the Regular Salary Line Item?	No. Paid Administrative leave is an eligible operating expense. You will need to include back up documentation to seek reimbursement.
Can we purchase small capital items with this funding such as sign holders, bus cameras?	Response on Call: Yes, small capital items can be purchased under this funding, but will need to be related to an expense related to COVID-19. Guidance from FTA: Only items that have a useful life of less than one year may be charged to operating expenses.
Can we replace our buses used the CARES Act funding?	The replacement of vehicles is eligible under the CARES Act funding. The vehicles that were considered for replacement were based on 2020 requests along with the vehicles that are up for replacement on ADOT's TAM plan.

Do we have an anticipated date of when E-Grants will open up?	We currently have closed E-grants down for updating subrecipient vendor numbers. We also submitted out CARES Act funding application and awaiting approval from FTA. Once we are awarded ADOT will be need to update GAEs so that you can bill all COVID-19 expenses starting February 1, 2020.
Do I understand correctly, that with this funding that it does not need to be listed in the TIPs or STIP?	Yes, you are correct. All normal requirements such as operating expenses and like replacement vehicles do not need to be listed in the TIPs or STIP.
Can we have a disinfecting company come in to clean the buses and have that covered 100% under the Cares Act for PM?	Yes, you can. You need to make sure that when you are procuring you are following your own agency's procurement guidelines as well as what is outlined in your 5311 contract.
Do agencies know their allocation amount? Or when will that be known?	ADOT will be sending out awards to agencies as well as posting awards to agencies as soon as ADOT's CARES Act funding application is approved.
How is it determined how much each Rural agency will receive from the CARES Act?	ADOT looked at every agency's remaining awarded funds, their 2020 requests, and used the evaluation process used yearly to award funding to agencies.
Can we purchase personal protective gear under supplies and have this reimbursed under the CARES Act funding?	Yes. You need to make sure to provide documentation of the purchase to seek reimbursement.
Does ADOT have guidance on how sub recipients should report the eligible items for reimbursement. For example, what will be needed to be uploaded to E-Grants as back up for these CARES Act funding related expenses?	Agencies should include documentation as you currently do under the traditional 5311 funding reimbursement. In your reimbursement, you would include your general ledger or documentation from any financial system your agency uses.
Could you talk more about the MM funds and how they will be distributed, what documentation is required, etc.?	ADOT looked at every agency's remaining awarded funds, their 2020 requests, and used the evaluation process used yearly to award funding to agencies. The documentation submitted with reimbursement would be similar to the current requirements.

Will E-grants be amended to reflect the combined expenses for PM, Admin & Ops?	Yes. E-grant will be updated to reflect the new CARES Act funding. ADOT is currently working on developing a strategy behind the scenes in E-grants for this funding.
Will extra 5310 funds be made available if 5311 is offsetting/augmenting 5310?	No. This funding is specifically for 5307 and 5311. However, 5311 agencies that contract with 5310 agencies for service can pay the 5310 agency with these funds.
Can you explain more about eligible expenses? If we have nothing essentially change in response to COVID 19, do we just not bill or does this mean that our normal operations will be billed as CARES expenses? I am a bit confused.	All current expenses to operate your service during COVID-19 are eligible for reimbursement. So, your current Admin, Operating, and Preventive Maintenance expenses are eligible for reimbursement under the CARES Act funding.
Are there special guidelines for emergency procurement, in particular installing physical barriers to protect transit operators?	FTA has created an Emergency Relief docket to allow agencies to request a waiver to allow temporarily relief from the FTA procurement requirements.
Will Intercity have a separate line added in E-grants?	Yes. ADOT is currently working on making that possible in E-grants.
How long are the funds set to continue? Is there a specific date, or when the total amount is used?	There is not an expiration dates for the funds. However, FTA would like for these funds to be spent expeditiously. ADOT will be assigning it to the grant lifecycle and we plan to roll any unspent funds to the following contract year (2020-2022).
Does ADOT have any supply lines or options for procuring personal protection equipment to assist 5310 and 5311 programs that are having trouble acquiring them?	No. Current there is nothing available on the state contract for those supplies. ADOT is currently experiencing similar difficulties. You may want to reach out to your Mobility Managers to see what neighboring agencies are doing for supplies. ADOT keep you informed of any updates regarding this.

For more information check FTA's FAQ webpage: https://www.transit.dot.gov/frequently-asked-questions-fta-grantees-regarding-coronavirus-disease-2019-covid-19#CARES