



North Central Texas
Council of Governments

Job Access/Reverse Commute and New Freedom Program Call for Projects

Questions and Answers

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2011

IMPORTANT: Federal Transit Administration (FTA) funds require a high degree of dedication to detail and reporting, along with very specific requirements. If you are unfamiliar with FTA regulations and grant management requirements or have not received FTA funds in the past, please review the documents associated with this Call for Projects to determine if your agency is willing, and has the institutional capacity, to comply with the required terms and conditions.

On October 7, 2011, the North Central Texas Council of Governments (NCTCOG) issued a Call for Projects to award Federal Transit Administration Job Access/Reverse Commute and New Freedom Program funds to eligible entities and projects within the Dallas/Fort Worth Metropolitan Area. NCTCOG held two (2) pre-proposal workshops on Monday, October 17 and Tuesday, October 18, 2011, for prospective project sponsors to learn more about the Call for Projects and to ask questions about the programs or prospective projects.

Questions were taken at the workshops, as well as via phone, e-mail and fax, through 5:00 p.m. on Friday, October 21, 2011. Responses to questions received are provided below based on the following categories:

1. Definitions
2. General
3. Project Submittals and Evaluation
4. Project and Grant Requirements
5. Funding/Matching Requirements
6. Job Access/Reverse Commute Program
7. New Freedom Program

DEFINITIONS

Capital Expense: Capital expenses are generally defined as tangible items with a useful life of more than one year. Funding is available at an 80/20 federal/local share and examples of capital purchases include: vehicles, service and support equipment, construction of bus shelters, mobile radio units, and capital support equipment (e.g., computer hardware, software, and other equipment that enhances operating efficiency). For more information, please refer to [Chapter III, Section 6 of FTA Circular 9030.1D](#) for more information.

Eligible Entities: Entities eligible to apply for and receive Job Access/Reverse Commute and New Freedom funds include:

- 1.) Private non-profit organizations;
- 2.) State or local governmental authorities; or
- 3.) Operators of public transportation services, including private operators of public transportation services.

Individual with a Disability: An individual who, because of illness, injury, age, congenital malfunction, or other incapacity or temporary or permanent disability (including an individual who is a wheelchair user or has semi-ambulatory capability), cannot use effectively, without special facilities, planning, or design, public transportation service or a public transportation facility. [\[FTA Circular 9045.1, Page I-3\]](#)

Low-Income: Refers to an individual whose family income is at or below 150 percent of the poverty line (as that term is defined in Section 673(2) of the Community Services Block Grant Act (42 U.S.C. 9902 (2)), including any revision required by that section) for a family of the size involved. [\[FTA Circular 9050.1, Page I-2\]](#).

Non-Profit Organization: A corporation or association determined by the Secretary of the Treasury to be an organization described by 26 U.S.C. 501(c) which is exempt from taxation or one which has been determined under State law to be non-profit and for which the designated State agency has received documentation certifying the status of the non-profit organization. Documentation certifying the status of the non-profit organization must be submitted as part of the project submittal. [\[FTA Circular 9045.1, Page I-3\]](#) and [FTA Circular 9050.1, Page I-3\]](#).

Operating Expense: Operating costs are considered those expenses necessary to operate, maintain, and manage a transit system. Operating expenses usually include such costs as driver salaries, fuel, and items having a useful life of less than one (1) year. The term "operating expenses" is defined in the Glossary of Transit Terms for the National Transit Database as "all expenses associated with the operation of an individual mode by an operator. Operating expenses do not include reconciling items such as interest expenses and depreciation." Generally, a grantee may call any eligible cost that is not a capital or planning cost an operating cost. For additional information, please refer to [Appendix C of FTA Circular 9030.1D](#).

Paratransit: Comparable transportation service required by the [American with Disabilities Act of 1990 \(ADA\)](#) for individuals with disabilities who are unable to use fixed route transportation systems.

Planning Expense: Activities relating to the planning and evaluation of transit projects. Eligible activities include, but are not limited to, studies relating to management, operations, capital requirements and economic feasibility, plans and specifications; evaluation of previously funded projects; and other similar or related activities prior to and in preparation for the acquisition or operational improvements of transit systems, facilities, and equipment. Planning assistance is available at the 80/20 federal/local share ratio. For more information, please refer to [Chapter III, Section 5 of FTA Circular 9030.1D](#).

Shared Ride: Refers to two or more passengers in the same vehicle who are otherwise not traveling together. Service which can be reserved for the exclusive use of individuals or private groups, either by the operator or by the first passenger's refusal to permit additional passengers, is not shared-ride service and therefore not eligible for funding under the JA/RC and New Freedom programs.

GENERAL

1. *Will there be additional opportunities to ask questions?*
The purpose of this document is to respond to initial questions, as well as common questions, received through the pre-proposal workshops. NCTCOG staff continues to be available to respond to questions or comments related to the Job Access/Reverse Commute Program, New Freedom Program, as well as specifics related to the Call for Projects. For your convenience, staff contact information is provided at the end of this document.
2. *In the application, the submitter is asked to identify the need for the project. Who identifies this need?*
The need of a project is identified by the submitting agency and can be demonstrated in several ways. Some examples would be through conducting surveys, collecting data, requests by citizens or agencies, etc. In the "Needs Assessment" component of the Project Narrative (Section II of the Project Submittal Form), applicants should explain how an identified project will provide relief to a given population or area. The applicant should explain the impact the project will have on persons with disabilities or how the project may enhance access to employment opportunities and employment related activities. In order to justify a need, an analysis may be conducted to demonstrate how an area or population may be negatively impacted if the proposed project is not implemented.

3. Where can I obtain data on the number of welfare recipients, low-income persons, or persons with disabilities in a given area?
The most common source of this data is the U.S. Census Bureau. A wealth of information can be found on their website at <http://factfinder.census.gov>. In addition, you can find information on NCTCOG's website at www.nctcog.org/ris/census/index.asp.
4. Where can I obtain a list of transportation service providers currently operating in the region?
Staff is available to assist you in identifying transportation providers in your area. In addition, a list of public transportation providers in the region is available on the NCTCOG website from the [Transportation Provider Inventory](#).
5. What is the timeline for successful proposals to receive funding?
Please refer to the schedule provided on Page 8 of the [Application Information Packet](#).
6. What is mobility management?
Mobility management is an eligible capital expense under both the Job Access/Reverse Commute and New Freedom Programs. Mobility management is defined as activities intended to build coordination among existing public transportation providers and other transportation service providers with the result of expanding the availability of service in the community. Mobility management does not include operating costs of a service. Examples of mobility management activities are provided in [FTA Circular 9050.1, Page III-9](#).
7. Is a private, for-profit taxi provider considered a private operator of public transportation services?
The Federal Transit Administration considers private, for-profit taxi companies that provide shared-ride service to the public or to special categories of users (such as older adults or persons with disabilities) on a regular basis to be operators of public transportation, and therefore eligible. NCTCOG may request supporting documentation. See Page 2 for the definition of "shared-ride."

NCTCOG encourages private, for-profit providers to explore partnership opportunities with nonprofit organizations, health and human service agencies or similar entities interested in providing transportation services that meet the needs of their clients. Project submittals demonstrating this form of collaboration and partnership are encouraged.
8. Is a city that doesn't currently have public transportation eligible to submit and receive JA/RC or New Freedom funds?
Yes. State or local governmental authorities are eligible subrecipients. See "eligible entities" definition on Page 1 for more information. However, NCTCOG encourages coordination with an existing transit provider (if available) to maximize service efficiencies and prevent potential duplication of efforts.
10. If a project fits under JA/RC and New Freedom, how does NCTCOG decide from which area to fund the project?
NCTCOG will accept projects that fit under more than one program area. Projects will initially be screened under the requirements of each program to ensure they meet basic program requirements and are derived from the regional coordination plan. If the project is selected for funding, NCTCOG will fund the project under the program that most closely matches the needs and goals of the project, maximizes the implementation of the region's coordination goals, policies, and strategies, and best utilizes funding available.

11. Must an Intent to Submit postcard be completed and returned in order for NCTCOG to accept and review a project submittal?
No. The Intent to Submit postcard is intended as a benefit to agencies and provides for a reminder to be sent approximately two weeks prior to the submittal deadline. However, whether or not an agency completes and returns the postcard has no impact on the acceptance or evaluation of a project submittal.
12. If my project qualifies for both the JA/RC and New Freedom Program, do I need to submit more than one application for funding?
No. An agency may submit a single application even though a project qualifies under both programs. In the Project Submittal Form under the Program Type, please check all the boxes that apply to the proposed project. However, if an agency has multiple projects which have different scopes and intents, separate applications are required.
13. Is a project focused on transporting the “elderly” eligible for funding?
No. Projects focused on transporting older adults are not eligible to receive funding. However, projects focusing on transporting older adults to and from work and work-related activities or transporting older adults with disabilities may qualify under the JA/RC or New Freedom Programs.
14. I am interested in purchasing vehicles for my project. How do I find more information on how to do this?
Appendix E of your [Application Information Packet](#) provides a detailed outline on selecting and determining a budget for vehicle purchases. Since the Federal Transit Administration (FTA) has very stringent regulations and competitive procurement requirements, NCTCOG will work with agencies and procure vehicles on their behalf. It is highly encouraged that agencies first attempt to exhaust all avenues of existing resources and/or existing service providers that they may be able to partner with before requesting funding for vehicles.
15. Has NCTCOG conducted and published an analysis on past projects that were funded through previous calls?
No. Because the Job Access/Reverse Commute and New Freedom Programs are fairly new, many of the projects funded by NCTCOG in past calls are still underway. If an agency is interested in learning about the types of projects that were considered for funding in past calls, please refer to the “[Past Calls](#)” page on our website. This page provides a summary of the projects that have been submitted and the resulting funding recommendations.
16. In the pre-Call workshop on September 28, NCTCOG proposed that projects would need to meet a \$100,000 minimum threshold. Is this still applicable?
No. The threshold was removed as a requirement for the 2011 Call for Projects. Instead, NCTCOG urges applicants to submit projects that fall into the Strategic Focus Areas as outlined in Appendix G of the [Application Information Packet](#).

PROJECT SUBMITTALS AND EVALUATION

1. Can the authorized representative, agency contact, and project manager be the same person?
The answer depends upon the agency’s organizational structure. The authorized representative is the individual at your organization with the legal authority to enter into contracts, typically an executive director or president. The agency contact is the person

available to answer questions and provide additional information as requested regarding the Project Submittal Form. The project manager is the individual that will actually be implementing the project and will serve as the project liaison to the NCTCOG project manager.

2. *How many projects may one entity submit?*

There is no limit on the number of projects an entity may submit. However, each project must be addressed on its own Project Submittal Form. As this is a competitive process, please give appropriate time and detail to all projects submitted.

3. *Should the detailed vehicle fleet and agency fleet plan be included in the Project Narrative section or may it be submitted separately?*

An agency's current vehicle fleet listing and/or fleet plan can be submitted separately.

4. *What if my agency doesn't have a fleet plan? Is there a template?*

There is no template for the fleet plan. If you currently have a fleet plan, that will be sufficient. Entities requesting funding for vehicle(s) that do not have a fleet plan in place should document the number and types of vehicles they currently operate, as well as where, when, and how the vehicle(s) being requested will be fueled, serviced, maintained, repaired, cleaned, etc.

5. *In what format should I submit my forms and additional documentation?*

Project proposals must consist of one original hard copy and one copy in electronic format. The requirement for an electronic copy may be satisfied by providing the Project Submittal Form in PDF and the Budget Sheets in Microsoft Excel. Supporting documents are preferred to be submitted in PDF format. As a reminder, no submittals will be accepted via e-mail.

6. *If a project is a collaboration of several community partners, will it receive a higher score?*

NCTCOG encourages projects that are collaborations among multiple community partners. The extent of collaboration and coordination among partners is a consideration in the project selection process and projects may obtain a higher score in the "Coordination, Collaboration and Partnership" criteria.

7. *Can project selection criteria be provided?*

Criteria used to evaluate projects are demonstrated in Appendix F of the [Application Information Packet](#). Applicants should respond to the points outlined in the Project Evaluation Guide to develop their Project Narrative.

8. *What are examples of supporting documents that demonstrate local match?*

Examples could include grant award letters, foundation award letters, funding commitment letters from partnering agencies, or statement from the applicant that its traditional revenues will be utilized. The purpose of requesting supporting documentation is to demonstrate that sufficient local funds are available and committed to a project.

9. *Are audited financial documents needed for agencies applying for funding?*

Depending on the project type, scope, dollar amount and experience an agency has with federal grants, NCTCOG may request financial information from an applicant to determine the institutional and financial capacity of the agency to administer the project. For non-profits, this would include the IRS Form 990. Audited financials may be requested from other eligible entities.

10. The “Implementation, Operations and Sustainability” section of the Project Narrative asks for a detailed timeline that includes major milestones. Can I submit this separately?
Yes. A detailed timeline that includes major milestones may be submitted separately.
11. What is the difference between an agency’s operational and technical capability and an agency’s institutional capability? (Refer to [Appendix F Project Evaluation Guide - “Implementation, Operations and Sustainability: 1c and 2d](#))
In the statement “The agency demonstrates operational and technical capability to carry out the proposed project successfully,” staff is looking for the organization’s overall capacity to handle the proposed project. This would entail an evaluation of similar past projects the organization has implemented as well as the available resources to the agency.
- Evaluation of “the agency demonstrates institutional capability to carry out the proposed project successfully” refers to the organizational structure, experience and skill set of the key staff of the proposed project. The expertise of the staff should be stated to provide a good argument as to why they are best suited for their role on the project. This would include personnel’s past experience and specialized knowledge that will be advantageous to the proposed project.
12. Should the points outlined in Marketing and Outreach (found under the [Implementation, Operations and Sustainability section](#)) only be addressed by applicants submitting marketing focused proposals?
No. For the Marketing and Outreach section, evaluators would like to briefly understand how the proposed project will be marketed to clients (if applicable), potential riders, stakeholders and the public. Applicants should also include methods of identifying partners that can aid in disseminating information about the project. The goal of any JA/RC or New Freedom project is to aid some population whether it be through providing service, enhancing existing services through the use of infrastructure/technology, etc. Therefore, this section asks how one of the groups mentioned above will learn more about the proposed project or how will the agency submitting reach out to partners to help bring efforts to the forefront of a given community. The question therefore should be answered by all applicants, not only those that are identified as marketing projects.
13. How many characters are allowed for each text box, specifically the Project Summary, Project Narrative, and Budget Narratives?
Project Summary: roughly 2250 characters, 26 lines
Narrative sections: roughly 4150 characters, 44 lines
Budget Assumptions: roughly 2700 characters, 29 lines
14. Does an applicant have to list all grants received by an agency or just those relating to the project?
The applicant should list all federal grants (i.e., HUD, Title III, etc.) and transportation-specific grants (i.e., 5307, 5310, JA/RC, etc.) currently received.

PROJECT AND GRANT REQUIREMENTS

1. What information will need to be provided in the monthly/quarterly status reports?
Monthly Status Reports shall include: work accomplished and current status for each project task; work activities anticipated or the following month by task; existing or anticipated problems that may affect the project schedule and proposed solutions; and

updated project schedule with milestones and deliverables. Forms will be provided to successful applicants as part of their contract.

2. *Do projects have to operate wholly within the urbanized area?*
No, projects do not have to be wholly in the given urbanized area. However, the project should focus on and directly benefit the urbanized area. A map of the Dallas-Fort Worth-Arlington and Denton-Lewisville urbanized areas is provided on Page 2 of the [Application Information Packet](#).
3. *If a project encompasses both the Dallas-Fort Worth-Arlington and Denton-Lewisville urbanized areas, how should this be reflected in the Project Submittal Form?*
The Service Area and Project Narrative should document the service area and service parameters of the project. NCTCOG will utilize this information to determine from which urbanized area funds will be awarded to selected projects.
4. *Is a thorough study of needs in a particular area to develop project ideas eligible as a planning or other expense?*
Planning is only an eligible expense under the Job Access/Reverse Commute Program, and cannot be funded under the New Freedom Program. It is important to note that a specific link between the planning activities identified and the JA/RC Program objectives must exist.
5. *Are there any emissions requirements for the vehicles purchased?*
Vehicles purchased must comply with the Clean Fleet Vehicle policy adopted by the Regional Transportation Council (RTC). Information on the Clean Fleet Vehicle policy is available on the NCTCOG website at <http://www.nctcoq.org/trans/air/programs/fleet/policy/index.asp>.
6. *Is it correct that "subrecipients that receive only JA/RC, New Freedom or Section 5310 assistance are not subject to FTA's Drug and Alcohol testing rules, but must comply with the Federal Motor Carrier Safety Administration rule for employees who hold commercial drivers licenses"?*
Yes. The Federal Transit Administration requirements related to Drug and Alcohol Testing under the Job Access/Reverse Commute and New Freedom Program are found in [Chapter VIII\(12\)](#) and [Chapter VIII\(11\)](#) in their respective guidance documents. Please note that if your agency is receiving other Federal Transit Administration program funds, the Drug and Alcohol Testing requirements remain in effect.
7. *Do operational expenses include allocation of shared costs such as driver pay, dispatch salaries, administrative salaries, maintenance department salaries, rent, utilities, taxes, insurance, professional fees, bank charges, telephone expense, equipment maintenance, depreciation, interest, office supplies, drug test, toll fees, (radio tower lease for driver communication), security, etc.? Are there any allocation rules or procedures?*
Under federally funded grant programs, recipients may incur costs of both a direct and indirect nature. A cost allocation plan is required if a grantee desires to charge indirect program-related costs to an FTA grant. For more information, please see [Chapter 3 of FTA Circular 5010.1D](#).
8. *What will be the contracting instrument for successful projects? May we review a copy at this time?*
Entities selected to receive grant funding will be required to enter into a contract with the North Central Texas Council of Governments. Copies are available upon request.

9. Are there procurement requirements for purchases of goods and services for a project?
Yes. Project sponsors will be required to comply with applicable federal procurement requirements for the purchase of goods and services. Additional information is available upon request and will be provided to entities awarded grant funds.
10. What happens to vehicles purchased with JA/RC or New Freedom funds when the project is over?
The Federal Transit Administration encourages maximum use of vehicles funded under the Job Access/Reverse Commute and New Freedom Programs. Vehicles are to be used first for program related needs for which the grant is made and then to meet other transportation needs of other federal programs or project needs, providing that they do not interfere with the project activities originally funded. If the equipment is no longer needed for the original program or project, the equipment may be used in other activities currently or previously supported by a federal agency. NCTCOG reserves the right to reallocate vehicles if necessary.
11. Are agencies required to purchase wheelchair accessible vehicles?
Yes. Vehicle purchases and any other capital expenditures funded through the Job Access/Reverse Commute and New Freedom Programs are required to be ADA accessible.
12. Are there any required specifications for technology purchases?
No. There are no required specifications for technology purchases. Technology purchases that entail implementing Intelligent Transportation Service (ITS) technology, GIS tools, automation, vehicle position monitoring systems (GPS), stop annunciators or detectable warning systems are just some of the examples of technology that can aid passengers as well as agencies to provide quality service. Technologies that are compatible with other transportation service providers in the region will receive further consideration.

FUNDING/MATCHING REQUIREMENTS

1. What is a reimbursement grant program?
Both the Job Access/Reverse Commute and New Freedom Programs are reimbursement grants. A reimbursement grant program requires that the entity implementing the project incur the costs first. The entity then submits an invoice for payment and eligible expenditures are reimbursed at the appropriate rate. Advancement of funds is prohibited.
2. How long does it take to get reimbursed by NCTCOG?
NCTCOG makes every effort to process complete and accurate requests for reimbursement within 45 days of receipt of the required documentation.
3. The grant will be a reimbursement contract. As such, can the subcontractor or provider of transportation use a unit rate; i.e., cost per trip or cost per mile? Can the match likewise be based on the same unit rate?
If documentation of the unit rate methodology is provided and approved by NCTCOG, the grantee may use a unit rate (i.e., cost per trip or cost per mile).
4. What does in-kind mean?
Non-cash local match such as donations, volunteer services, or in-kind contributions are federally eligible to be counted toward the local match requirement. However, the use of such non-cash local match will result in increased reporting, documentation, administration, and oversight.

5. Can in-kind donations (i.e., vehicles) be counted towards the local match portion of the cost of the project?
NCTCOG will consider requests for the use of non-cash local match on a case-by-case basis.
6. Can money from other federal or state funding sources be used as local matching funds?
Yes. However, the local share must be provided from sources other than Federal Department of Transportation funds. Some examples of sources of local match which may be used for any or all of the local share include (but are not limited to): State or local appropriations; other non-DOT federal funds; dedicated tax revenues; private donations; revenue from service contracts; and toll revenue credits. Please see the Job Access/Reverse Commute [\[FTA Circular 9050.1, Chapter III-12\]](#) and New Freedom [\[FTA Circular 9045.1, Chapter III-12\]](#) program guidance for more information on potential sources of local match.
7. If we have a potential source of matching funds and something happens with that source after the application is submitted, will we have an opportunity to submit a replacement? What if a grant has already been approved? What happens if we cannot find substitute, both before and after grant is approved?
NCTCOG encourages project sponsors to identify and secure local match prior to submittal and execution of a contract with NCTCOG. However, NCTCOG understands the nature and difficulty in securing local match and will work with project sponsors related to local match issues. If after substantial time and/or effort, a project has no source or potential source of local match, the federal funds will be de-obligated and reprogrammed in subsequent calls.
8. If a project is selected for funding, is there a specific amount of time that the money must be spent?
Project expenditures should occur within a reasonable timeframe of what is specified in the project submittal. NCTCOG reserves the right to de-obligate and reprogram awarded funds if projects do not progress satisfactorily or if budget surpluses exist after a project timeline expires.
9. How many years can projects get funded through this Call for Projects?
Projects can be submitted for one, two, or three years of funding under this Call for Projects. Funding under these two programs is limited, and as such is intended to be used to pilot new and innovative solutions to address the unmet transportation needs of people with disabilities and individuals with limited incomes. NCTCOG envisions funding under these two programs to serve as “seed money” and encourages projects that have the potential to become self-sustaining.
10. Can projects submitted in this Call for Projects get more funding in the next Job Access/Reverse Commute & New Freedom Call for Projects?
Eligible projects funded with Job Access/Reverse Commute or New Freedom funds may continue to be eligible for funding as long as the project(s) continue to be part of the coordinated plan. However, as mentioned above, NCTCOG is looking for projects that have the potential to become self-sustaining. In addition, there is no guarantee that a given project will be funded through subsequent competitive calls for projects.

11. Should I fill out the worksheets from Year 1 through Year 3 in the Budget Sheets even though I only need funding for two years?
No. The worksheets should only reflect the years of requested funding, from one up to the maximum of three.
12. Can funds be moved around in a budget? For example, in a multi-year project, can the subrecipient ask for year two funds during the first year of the project?
Requests to advance funding will be considered on a case-by-case basis.
14. Is there an official list of eligible expenses under the JA/RC and New Freedom programs?
There is no official list of line items that may qualify under the Operating, Capital, or Planning funding categories. For an example of the types of expenses that would qualify under the three funding categories, refer to Appendix D of your [Application Information Packet](#). Staff can further assist if an agency is unsure of what category to place a given expense in. Please reference Page 1-2 for definitions of “Capital Expense,” “Operating Expense” and “Planning Expense.”
15. Since funding is provided on a reimbursement basis, can funds be expended before a Notice to Proceed is issued?
No. Projects must be under contract and a Notice to Proceed issued by NCTCOG before any project expenditures may be considered eligible for reimbursement.
16. Can fares or donations for a ride be considered local match?
No. Fares or donations for a ride can be used to reduce the net cost of a service but cannot be used to satisfy the local match.
17. Are Transportation Development Credits (TDCs) eligible for local match?
Yes. TDCs are eligible to be utilized as local match. Agencies proposing to use TDCs should submit documentation of their request and/or award from the Texas Department of Transportation (TxDOT). NCTCOG recommends that agencies requesting TDCs from TxDOT also have a secondary source of local match secured.

JOB ACCESS/REVERSE COMMUTE PROGRAM

1. What is the definition of “low-income” for purposes of the Job Access/Reverse Commute Program?
Please reference the “low-income” definition provided on Page 1 of this document.
2. Does a project have to be new (or expanded) to receive funding under the Job Access/Reverse Commute Program?
No. However, NCTCOG places an emphasis on projects intended to fill gaps or provide service where service is limited or none is currently available.
3. Can I use JA/RC funds to provide transportation service to and from my business/facility for my clients only?
Yes. However, please keep in mind that the employees must qualify as low-income (Job Access) or the business/facility must be in a suburban locale (Reverse Commute) to be eligible for funding. NCTCOG encourages projects selected for funding be open to all individuals interested in utilizing the service.

4. Are after school agencies/programs eligible to receive JA/RC funding?
Based upon Federal Transit Administration guidance updated April 24, 2008, “projects that transport children of low-income parents to and from school or after school locations do not constitute transportation to employment support services under the JA/RC Program and would not be eligible for JA/RC funds.”
5. Is it necessary to verify individuals’ income information to operate a Job Access project?
Yes. However, the determination that an individual is “low-income” may be derived from indirect sources, which could include: a high-percentage of welfare recipients residing in the zip code served by the project, enrollment of an individual or group of individuals in a federal support program based on income, or origin and destination of the trips (e.g., workforce centers, sheltered workshops, subsidized housing, outreach agencies, etc.).
6. Is the Job Access/Reverse Commute Program mostly for low income individuals?
The Job Access/Reverse Commute Program is more like two programs: Job Access and Reverse Commute. Job Access supports projects that transport eligible low-income individuals to and from jobs and activities related to their employment. Reverse Commute supports projects designed to transport residents of urban, suburban, and rural areas to suburban employment opportunities. Note that the Reverse Commute program does not have any income requirements.

NEW FREEDOM PROGRAM

1. What is “new” service under New Freedom?
For the purposes of the New Freedom Program, “new” service is any service or activity that was not operational on August 10, 2005, and did not have an identified funding source as of August 10, 2005, as evidenced by inclusion in the Transportation Improvement Program (TIP) or Statewide Transportation Improvement Program (STIP). In other words, if not for the New Freedom Program, the project would not be operational. Subrecipients may not terminate ADA paratransit enhancements or other services funded before August 10, 2005, in an effort to reintroduce the services as “new”. [\[FTA Circular 9045.1, Chapter III-11\]](#)
2. Can New Freedom funds be used to pay for trips currently being provided?
No. New Freedom funds must be used for new public transportation services or new public transportation alternatives that go beyond the requirements of the ADA. The only exception to this rule is in the case of eligible projects previously funded with New Freedom funds. These projects may continue to be eligible for funding as long as the projects continue to be consistent with the coordinated plan.
3. Do volunteer drivers need ADA accessible vehicles?
If using personal vehicles, volunteer drivers would not be required to provide ADA accessible vehicles. However, FTA does note that any volunteer program supported by New Freedom funds must meet the requirements of both “new” and “beyond the ADA.”
4. Is bringing a vehicle up to ADA requirements an eligible expense?
No. Vehicle enhancements must go beyond the requirements of the Americans with Disabilities Act to be eligible for funding under the New Freedom Program.
5. How is an individual qualified as “disabled”? Who makes the determination?
The determining factor is whether or not the individual has a medical condition, either temporary or permanent, that prevents him or her from driving safely. This determination

is made by the agency submitting the project, but agencies typically rely on a note or standardized form signed by a licensed medical professional.

6. *Does an individual have to be receiving benefits to be qualified as disabled?*
No. A disabled person does not have to be receiving benefits or have any formal documentation required to qualify. The receipt of federal and/or State benefits is not a determining factor for eligibility.

7. *Can a project focus on a particular location or population with similar disabilities?*
Yes. Projects can focus on serving a specific population of disabled persons as well as limit services to a specific geographical area. In the “Needs Assessment” of the Project Narrative, be sure to clearly state how the analysis was conducted to determine the specific needs of a given area or population.

ADDITIONAL RESOURCES

New Freedom Guidance

http://www.fta.dot.gov/documents/FTA_C_9045.1_New_Freedom.pdf

Job Access/Reverse Commute Guidance

http://www.fta.dot.gov/documents/FTA_C_9050.1_JARC.pdf

FTA Circular 5010.1C – Grant Management Guidelines

http://www.fta.dot.gov/documents/C_5010_1D_Finalpub.pdf

FTA Circular 9030.1 - Urbanized Area Formula Program

http://www.fta.dot.gov/documents/FTA_Circular_9030_1D_3-31-10.pdf

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