

National Rural Transit Assistance Program

6th National RTAP Conference
Austin, Texas, December 9, 2025



FTA Tribal Transit Program Oversight and New Guidance

Tribal Transit Program (TTP)

Objective

- *Provide direct funding to federally recognized Indian tribes to provide public transportation service on and around Indian reservations or tribal land in rural areas*

Eligible Recipients

- *Federally recognized Indian tribes, and*
- *Alaska native villages, groups or communities as identified by the US Department of Interior*

Tribal Transit Program

SAFETEA-LU (FY 2006-2012)

Created the Tribal Transit Program

- Administered as a competitive program at approximately \$15 million per year

MAP-21(FY 2013-2014)

Continued and Modified TTP

- Formula Program : \$25 Million per year
- Competitive Program: \$5 Million per year

Tribal Transit Program

Fixing America's Surface Transportation (FAST) Act (FY 2015-2020)

TTP funding increased from \$30M to \$35M per year, a 17 percent increase.

- \$30M is distributed by Formula
- \$5M is awarded competitively

Consolidated Appropriations Act (FY2021) continued the same amount of funding for formula and competitive program.

Tribal Transit Program Funding

Infrastructure Investment and Jobs Act (FY 2022-2026)

Increase funding levels for both TTP Formula and Competitive Programs and added an annual funding increase

- Formula Program: Starting with \$35 M per year with an annual increase ending with \$38 M per year
- Competitive Program: Starting at \$8.75 M per year with an annual increase ending at \$9.6 M per year

In Millions						
Funding Program	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025	FY 2026
TTP Formula	\$30.0	\$35.01	\$35.74	\$36.68	\$37.43	\$38.39
TTP Competitive	\$5.0	\$8.75	\$8.94	\$9.17	\$9.36	\$9.60

Formula Apportionment

Eligible Projects

- Any purpose eligible under Section 5311
- Operating, Capital and Planning

Eligible Federal Share

- 100% (no match required for formula funds)

Funding Availability

- Funds are available the year appropriated plus two years (total of three years)

FTA 5311 Program Circular



<https://www.transit.dot.gov/regulations-and-guidance/fta-circulars/final-circulars>

[FY2024 Dear Colleague Letter - Circular Updates](#)

FTA Tribal Transit Program (TTP) – Formula Calculation

Tier	Percentage of TTP Formula Funding	Criteria
1	50%	Vehicle Revenue Miles (NTD)
2	25%	Indian Tribes providing at least 200,000 vehicle revenue miles (NTD)
3	25%	Indian Tribes providing public transportation on reservations where more than 1,000 low-income persons reside (Census data)

How is Formula Calculated?

Total Formula for Transit System with 147,059 VRM

- Tier 1: $147,059 \text{ VRM} \times \$0.75 = \$110,294$
- Tier 2: did not operate at least 200,000 VRMs = \$0
- Tier 3: Maximum low income = \$300,000

Total TTP Formula = \$410,294

FY2025 TTP Formula Apportionment Actual

- Tier 1: 130 Tribes (various \$\$ @ \$0.92/mi) (20,329,000 miles)
- Tier 2: 36 Tribes received \$268,262
- Tier 3: 57 Tribes (various), 13 received maximum

Total FY2025 TTP Formula = \$37,555,590

TTP Competitive Program

Eligible Projects	Eligible Federal Share	Funding Availability
<ul style="list-style-type: none">• Planning<ul style="list-style-type: none">✓ \$50,000 cap (increase from \$25,000)	100%	3 years (Year of Allocation + 2 FY)
<ul style="list-style-type: none">• Capital<ul style="list-style-type: none">✓ New Services✓ Replacement (bus, equip, facility)✓ Expansion (bus, equip, facility)	100%	
<ul style="list-style-type: none">• Operating<ul style="list-style-type: none">✓ All eligible recipients✓ Indirect costs limited 10% of award	100%	

TTP Competitive Program

FY2024 Competitive Program

On January 13, 2025, FTA announced the selection of approximately \$9.6M million to 26 projects in 14 states in funding from the Tribal Transit Grant Program. For more information:

<https://www.transit.dot.gov/funding/grants/grant-programs/fiscal-year-2024-tribal-transit-project-selections>

FY2025 Competitive Program

The Notice of Funding Opportunity (NOFO) anticipated in late 2025, early 2026.

- Attend webinar
- Make sure you registered in Grants.gov

TTP Technical Assistance Assessments

- Designed to provide technical assistance to Tribes who are direct recipients of TTP funding
- Identify areas in need of technical assistance and assist Tribes to put solutions in place to address these needs
- Consider Assessment a “one on one” technical assistance workshop

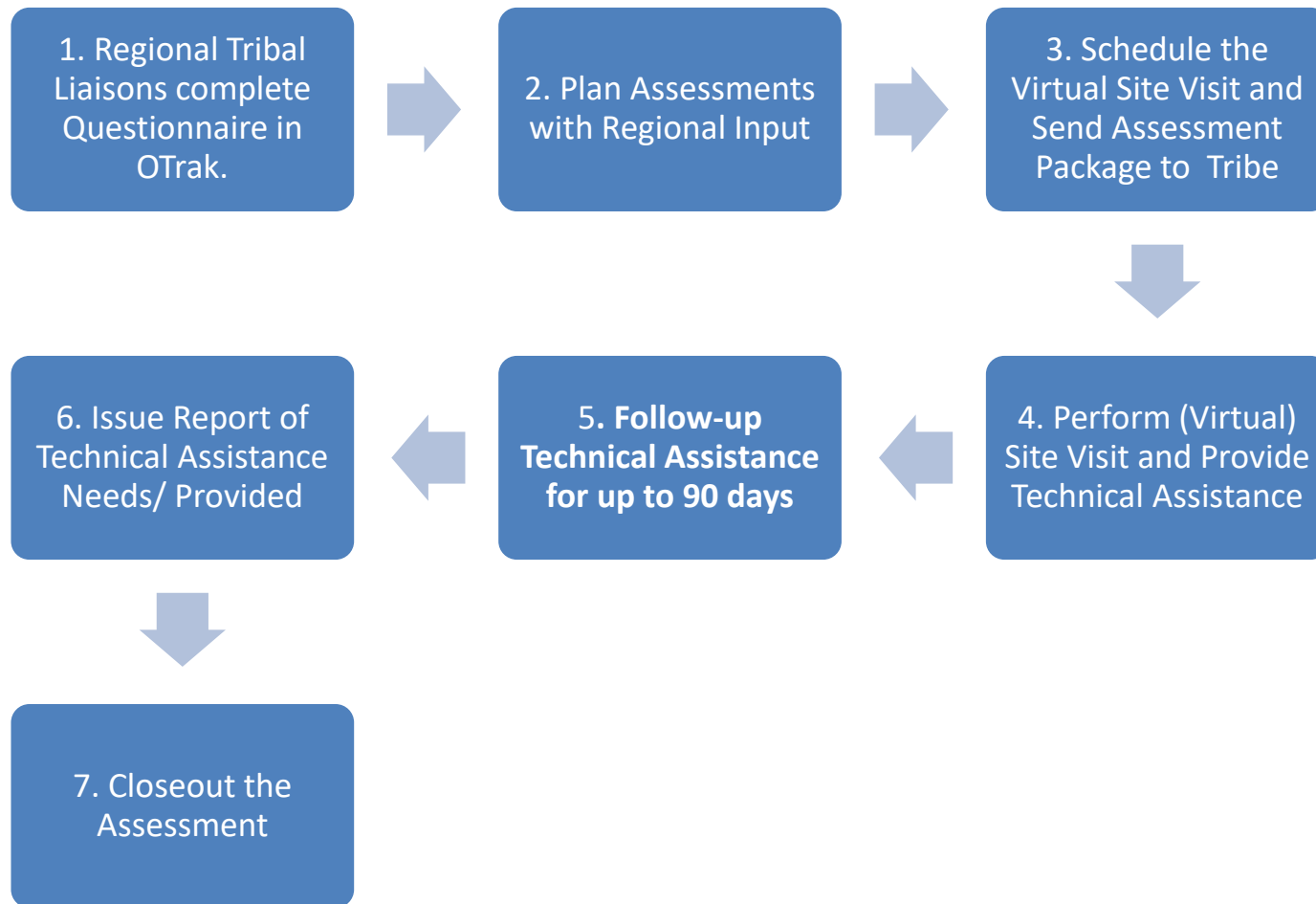
TTP Technical Assistance Assessments

- 10 Tribes participated in the FY2011 pilot program;
- First 13 Assessments conducted in FY2015
- Approximately 13-19 Tribes received TA Assessments each year;
- Expanded the TAA Program in FY 2023
- 31 Tribes selected in FY2023 for Assessments across all 10 Regions
- 26 Tribes selected in FY2024 for Assessments across all 10 Regions
- 131 Assessments performed through FY2025
- Tribes are identified by FTA Regional Tribal Liaisons

Areas Covered During TTP Assessments

- Legal, Technical Capacity and Award Management
- Financial Management and NTD
- Transit Asset Management
- Satisfactory Continuing Control
- Maintenance
- Procurement and Buy America
- Charter Bus
- Americans with Disabilities Act (ADA)
- Drug-Free Workplace Act and Drug and Alcohol Testing Program

Technical Assistance Assessment Process

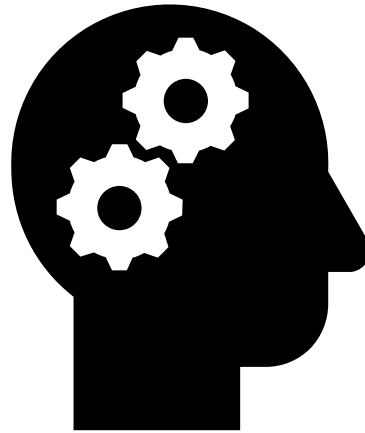


Follow Up Technical Assistance – 90 days

How does it work?

- Identified during the planning phase and Assessment site visit
 - Input from Region
 - Input from Assessment Team research
 - Input from Tribe during Assessment site visit
- Summary of Technical Assistance Needs
 - Provided at the conclusion of the Assessment site visit
- Schedule Technical Assistance sessions with Tribe
 - Include relevant Tribal staff
 - Schedule at convenient time(s)
 - Hands-on, real-time technical assistance
 - Best practices and resources shared

Questions, Concerns, & Comments?



The Tribe
Summary Table of the TTP Technical Assistance Assessment
December 7 - 8, 2025

TTP Assessment Area		Technical Assistance Provided
A.	Legal, Technical Capacity, and Award Administration	<p>(1) Authorizing Resolution and Designation of Authority – The Assessment Team advised the Tribe (TRIBE) to update its required forms and documents to reflect a current Authorizing Resolution (AR), in order to file and execute grant applications, and draw payments against available grant funds on behalf of TRIBE. Additionally, TRIBE was advised to have a Designation of Signature Authority (DSA) for Transit Manager to PIN the annual Certifications and Assurances (C&A) on behalf of the Chief. TRIBE was advised to review and update the user roles in TrAMS to reflect the current status of its users due to recent staffing changes. Additionally, the Assessment Team advised TRIBE to upload the signed AR and DSA to TrAMS.</p> <p>At the time of the site visit, TRIBE did not have an authorized person to submit ECHO payment requests. The Assessment Team assisted TRIBE with submitting an initial request for ECHO authorization for the Transit Manager and the Grants and Contract Manager.</p> <p>FFR and MPR Reporting. The Assessment Team reviewed TRIBE’s annual FFR and MPRs, and discussed circular 5010.1F guidance for completing the reports. The Assessment Team discussed the due date for the reports and the process of reconciling the Tribe’s reports with TrAMS, to ensure the reports agree with TrAMS. The Assessment Team discussed the calculation and reporting unliquidated obligations, providing a narrative discussion addressing status of all awards; any delays; amendments; and complaints or protest; and revising all milestone estimated or completion dates on the MPRs and FFR. TRIBE was advised to ensure it responds to the FTA’s remarks. The Assessment Team discussed charging indirect costs to its awards and how to report it on the FFR. TRIBE was advised the due date for FFRs and MPRs is 30-days after the close of the quarter.</p> <p>The Assessment Team advised TRIBE it had not been drawing down funds on its awards, making them inactive. The Assessment Team and TRIBE discussed the Tribe’s available expenses that could be applied to the current list of open awards. The Assessment Team advised TRIBE of the urgency to spend down the ARP funding, and advised the Tribe to prioritize the spending and closing of the CRSSA, CARES and ARPA funds.</p> <p>See FTA Circular 5010.1F – Award Management Requirements, Chapter III, 3. Reporting Requirements for full list of FFR and MPR items https://www.transit.dot.gov/sites/fta.dot.gov/files/2024-10/C5010.1F-Circular-11-01-2024_0.pdf</p>

B.	Financial Management and National Transit Database	<p>(2) Financial Management Policies and Procedures: The Assessment Team discussed the requirements for having financial management policies and procedures in place for managing Federal awards, establishing internal controls, ensuring timely distribution of funds, and determining allowability of costs. The Assessment Team advised TRIBE to have procedures for Allowable Cost and Cash Management in accordance with 2 CFR 200.</p> <p>The Assessment Team advised TRIBE on charging indirect costs (IDC) to its awards. The Assessment Team informed the Tribe how to correctly report the IDC based upon the funds expended in the current period, opposed to the total award value.</p> <p>(3) The Assessment Team advised TRIBE to develop a 3–5-year financial plan (Plan) to project and managing the Transit funding and expenses over a multi-year period. The Plan should list out all available funding sources and breakout expenses by operating costs and capital expenditures.</p> <p>(4) National Transit Database: The Assessment Team reviewed the requirements for reporting to the National Transit Database (NTD). The Assessment Team explained the TTP Program formula calculations by each Tier. With its reported vehicle revenue miles under 200,000, the Tribe missed Tier II threshold of 200,000 mile by approx. 30,000 miles. The Assessment Team shared with TRIBE, Tribes who had previously qualified for Tier II received an additional \$250,000. TRIBE was informed revenue miles from sponsored services that are a part of a coordinated human service transportation plan can be included in its annual submission of revenue miles.</p> <p>See FTA Circular 5010.1F Award Management Requirements https://www.transit.dot.gov/sites/fta.dot.gov/files/2024-10/C5010.1F-Circular-11-01-2024_0.pdf</p>
C.	Transit Asset Management	<p>(5) Transit Asset Management: TRIBE submitted its Transit Asset Management Plan (TAM plan). The Assessment Team proposed a follow-up meeting to review and train on how to develop a TAM plan; designate an accountable executive and document its responsibilities; and submit its annual performance targets through the National Transit Database (NTD).</p>
D.	Satisfactory Continuing Control	<p>(6) Disposition requirements for FTA-funded equipment: The Assessment Team discussed the disposition of FTA-funded equipment pre- and post-useful life and submitting reimbursements to the FTA through Pay.gov. The Assessment Team discussed the disposition of rolling stock and equipment that have met their minimum useful life, purchased with federal assistance, with a fair market value of more than \$10,000. The recipient may retain \$5,000 plus the percentage of its local share in the original award. If the fair-market value equals \$10,000 or less, the recipient may retain the full value. Any remaining federal share is returned to FTA through pay.gov.</p> <p>See pay.gov https://www.pay.gov/public/home</p>

E.	Maintenance	<p>(7) Vehicle Preventive Maintenance Procedures and Inspection Records: The Assessment Team advised TRIBE to develop a vehicle maintenance policy and procedures manual and checklist. The Assessment Team discussed timely performance of inspections and oversight of maintenance performed and accurate reporting of services performed. TRIBE was advised to include ADA accessibility features on its vehicle inspection checklists to ensure periodic inspection and maintenance.</p> <p>(8) Facility and Equipment Preventive Maintenance Procedures and Inspection Records: The Assessment Team discussed the need to have written maintenance plans for its FTA-funded facilities and equipment that meet FTA requirements. The plan describes a system of periodic inspections and preventive maintenance to be performed at certain defined intervals. Maintenance plans should conform to the manufacturer’s warranty requirements and include periodic inspection and maintenance of ADA accessibility features. Written procedures for pursuing warranty claims was also recommended. TRIBE should maintain records to ensure that maintenance is performed in accordance with its plan.</p> <p>Attachments:</p> <ul style="list-style-type: none"> • Sample Vehicle and Facility Maintenance Plans
F.	Procurement and Buy America	<p>(9) Procurement Policies and Procedures: The Assessment Team shared with TRIBE, FTA’s circular 4220.1F. The Assessment Team showed TRIBE how to access the National RTA (NRTAP) website, demonstrated how to setup a procurement in ProcurementPro, and how to download all the Federal Clauses. The Assessment Team advised TRIBE to utilize a procurement checklist to ensure procurements are conducted in accordance with its written procedures. The Assessment Team shared available procurement checklist on the FTA website as well as NRTAP.</p> <p>See FTA Circular 4220.1G – Third Party Contracting Guidance https://www.transit.dot.gov/regulations-and-guidance/fta-circulars/third-party-contracting-guidance</p> <p>National Rural Transportation Assistance Program Procurement PRO website link. https://www.nationalrtap.org/Technology-Tools/ProcurementPRO</p>
G.	Americans with Disabilities Act	<p>(10) ADA Complaint Process: The Assessment Team provided technical assistance with developing a formal complaint process, advertised to the public and accessible to and usable by individuals with disabilities. The Assessment Team discussed the procedures for prompt and equitable resolution of complaints, and the tracking and retention of the complaints.</p> <p>The Assessment Team discussed the process of developing a website for the Transit service that would include an ADA complaint policy that can be loaded as a link or through HTML format. TRIBE was advised to avoid the use of language that restricts use of lifts based on perceived disability of a patron or weight standards not consistent with the original equipment manufacturer’s requirements.</p>

		<p>https://www.nationalrtap.org/Technology-Tools/Website-Builder</p> <p>(11) Oversight of ADA General Service Provisions: The Assessment Team discussed the need to monitor the transit service for ADA Subpart G, general service provisions, which include:</p> <ul style="list-style-type: none"> • Stop announcements • Route identification • Service animals • Priority seating • Wheelchair size and weight • Lift or ramp deployment • Respirators, concentrators, and portable oxygen • Information in accessible formats • Reasonable modification <p>TRIBE was advised to include the ADA service provisions in its oversight checklist when conducting ride-a-longs or performing other oversight/supervisions of its transit services to document that the monitoring is being conducted.</p> <p>See FTA Circular 4710.1 Americans with Disabilities Act, Chapter 2. General Requirements https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/Final_FTA_ADA_Circular_C_4710.1.pdf</p>
H.	Drug and Alcohol Program	<p>(12) Drug and Alcohol Policy: The Assessment Team assisted TRIBE to develop a new Drug and Alcohol Policy using the FTA Drug and Alcohol Policy Builder. The Assessment Team reviewed the new TRIBE’s, FTA Drug and Alcohol Policy, advising TRIBE to complete the Policy and submit it to the Tribal Council for adoption. The Assessment Team also discussed the elements of the Policy and its implementation. The Assessment Team also review the available resources on the FTA website, like the training videos for safety-sensitive employees and supervisors, reasonable suspicion evaluation forms, post-accident tip sheets, and other pertinent resources.</p> <p>(13) Drug and Alcohol Management Information System: The Assessment Team discussed the requirement for submitting Drug and Alcohol Management Information System (DAMIS) reports summarizing drug and alcohol test results to FTA’s Office of Safety and Security annually.</p> <p>(14) Monitoring drug and alcohol testing vendors: The Assessment Team discussed requirements for ensuring the testing facilities are complying with 49 CFR Part 655 and their service agents have active certifications.</p> <p>See FTA Drug and Alcohol Tools and Resources – Policy Builder https://transit-safety.fta.dot.gov/DrugAndAlcohol/Tools/Default.aspx</p>

**The TRIBES
Summary Table of the TTP Technical Assistance Assessment
December 13 - 14, 2025**

TTP Assessment Area		Technical Assistance Provided
A.	Legal, Technical Capacity, and Award Administration	<p>(1) Authorizing Resolution, Designation of Authority and Opinion of Counsel – The Assessment Team advised the Tribes (TRIBES) to amend its Authorizing Resolution (AR) to include an authorization for drawing down federal funds in ECHO. TRIBES was advised to upload the AR into TrAMS.</p> <p>(2) FFR and MPR Reporting. The Assessment Team reviewed the Tribes’ annual FFR and MPRs. The Assessment Team walked through an FFR, advising TRIBES on how to complete the FFRs. The Assessment Team discussed how to calculate unliquidated obligations, calculating and reporting indirect costs, reconciling cash receipts and cash disbursements to TrAMS, and reporting accrual expenses. The Assessment Team assisted TRIBES to prepare its MPRs and FFRs for the quarter. TRIBES submitted the reports in TrAMS and provided copies of the submitted report to the Assessment Team. The Assessment Team demonstrated how to run a disbursement report from TrAMS, how to view the award fund status for active awards, and how to prepare an award closeout. The Assessment Team discussed the TRIBES amending its award to spend remaining ARP funds on current operating expenses so the award could be closed. The Assessment Team recommended the TRIBES consider spending the remaining ARP funds on operating assistance since its vehicle delivery was delayed by 18 months.</p> <p>The Assessment Team advised the TRIBES that it could apply its approved indirect costs (IDC) to its awards. TRIBES has an approved NICRA of 21.13% but applied the 10% de minis rate to its awards. The Assessment Team informed TRIBES how to report the base, rate, and IDC charged for the period.</p> <p>See FTA Circular 5010.1F – Award Management Requirements, Chapter III, 3. Reporting Requirements for full list of FFR and MPR items https://www.transit.dot.gov/sites/fta.dot.gov/files/2024-10/C5010.1F-Circular-11-01-2024_0.pdf</p>
B.	Financial Management and National Transit Database	<p>(3) Financial Management Policies and Procedures: The Assessment Team advised TRIBES to develop desk procedures to document many of its accounting procedures. The Assessment Team advised TRIBES to have written procedures for Allowable Cost and Cash Management in accordance with 2 CFR 200.</p> <p>TRIBES provided a demonstration of its Cuffing reports that allow for the tracking of projects and awards by line items. TRIBES maintain up-to-date information on all contractual obligations, payments made, funds received, project status, and remaining project balances. Through the discussions, TRIBES was able to demonstrate an understanding of how</p>

		<p>to track, calculate and report unliquidated obligations. The Assessment Team shared the operating expense calculation worksheet from FTA Circular 9040.1G.</p> <p>The Assessment Team discussed with TRIBES its plans for the transit service. TRIBES advised that it was transitioning back to its fixed route service, adding a few routes at a time. The Tribe also intended to increase the size of its fleet. The Assessment Team discussed methods for notifying the public of the services to increase ridership. The Assessment Team advised TRIBES on how to prepare a 3–5-year financial plan, and the benefits of developing multi-year plans based on available funding. The Assessment Team also discussed the FTA Tribal Transit Discretionary Funds and various federal funding sources that can be found on the FTA website. The Assessment Team reviewed TRIBES’s NTD reports, noting a significant drop in revenue miles resulting from the loss of fixed routes during COVID-19. The Assessment Team shared with TRIBES the list of Sponsored Service for which they can include in their reported miles.</p> <p>(4) Grant Administration: The Assessment Team discussed developing and maintaining an award closeout schedule for open awards. TRIBES was advised how a close out schedule assists with the management of its projects and awards.</p> <p>(5) National Transit Database: The Assessment Team reviewed TRIBES’s National Transit Database (NTD) reports for the prior three years. TRIBES was advised of additional vehicle revenue miles from other Sponsored Services as detailed in the NTD manual that are part of a coordinated human service transportation plan that can be included in the Tribe’s annual vehicle revenue miles reported to the NTD.</p> <p>See FTA Circular 5010.1F Award Management Requirements https://www.transit.dot.gov/sites/fta.dot.gov/files/2024-10/C5010.1F-Circular-11-01-2024_0.pdf</p>
C.	Transit Asset Management	<p>(6) Transit Asset Management: TRIBES provided its Transit Asset Management Plan (TAM plan). The updated TAM plan as of September 2022 was organized, addressing status of inventory and status assessment. The Assessment Team provided technical assistance to develop an organizational chart to demonstrate the accountable executive’s position within the organization and adding responsibilities of the accountable executive to its job description.</p>
D.	Satisfactory Continuing Control	<p>(7) Equipment Inventory and Disposition Requirements: The Assessment Team discussed the purpose for ensuring the FTA-funded equipment remains available to be used for its original purpose throughout the useful life until disposition. The Assessment Team reviewed the TRIBES’s equipment inventory and provided technical assistance on the elements of an inventory to be documented in accordance with 2 CFR 200.313, and to include its rolling stock and its two maintenance facilities. The Assessment Team discussed conducting bi-annual inventories and reconciling the inventory results to the agency’s financial records/asset management system.</p> <p>(8) Disposition requirements for FTA-funded equipment: The</p>

		<p>Assessment Team discussed the disposition of FTA-funded equipment and rolling stock pre- and post-useful life and reimbursing the FTA through pay.gov when there is greater than \$10,000 of fair market value remaining in the asset. TRIBES was advised that insurance proceeds received due to loss or damaged property are to either be applied to the replacement of the asset or reimburse the FTA its remaining federal proportionate share through pay.gov.</p> <p>See pay.gov https://www.pay.gov/public/home</p> <p>See FTA Circular 5010.1F, Award Management Requirements, page IV-49 https://www.transit.dot.gov/sites/fta.dot.gov/files/2024-10/C5010.1F-Circular-11-01-2024_0.pdf</p>
E.	Maintenance	<p>(9) Vehicle Preventive Maintenance Procedures and Inspection Records: The Assessment Team reviewed the TRIBES’s vehicle maintenance policy and procedures manual. Technical assistance was provided with the requirements for developing a vehicle maintenance manual to include required elements; ensuring timely performance of inspections and oversight of its third-party provider for regular and accurate reporting of services performed. The Assessment Team advised TRIBES to include ADA accessibility features on its vehicle inspection checklists to ensure periodic inspection and maintenance.</p> <p>Assessment Team provided a vehicle maintenance and facility maintenance inspection monitoring tool.</p> <p>(10) Facility and Equipment Preventive Maintenance Procedures and Inspection Records: The Assessment Team discussed the need to have written maintenance plans for its FTA-funded facilities and equipment. The Assessment Team discussed having a system of periodic inspections and preventive maintenance to be performed at certain defined intervals. The Tribe was advised to develop plans that conform to the manufacturer’s warranty requirements, and include periodic inspection and maintenance of ADA accessibility features. The Tribe was advised to have written procedures for pursuing warranty claims.</p> <p>(11) Special Flood Zone: The Assessment Team discussed the Tribe’s process for developing procedures for ensuring FTA-funded facilities and equipment are not located in special flood hazard areas.</p>
F.	Procurement and Buy America	<p>(12) Procurement Policies and Procedures: TRIBES provided their procurement policy manual. The Assessment Team discussed the National Rural Transportation Assistance Program’s (NRTAP) Procurement PRO and the contract provisions available on the NRTAP website.</p> <p>(13) Procurement File Review: The Assessment Team advised TRIBES to utilize a procurement checklist to ensure procurements document the following elements: responsibility determination, procurement written H\history, method of procurement, independent cost estimate, clauses</p>

		<p>and certifications. TRIBES was advised to secure all necessary files from the procuring agency prior to accepting an assignment of options from another agency’s procurement.</p> <p>See FTA Circular 4220.1G – Third Party Contracting Guidance https://www.transit.dot.gov/regulations-and-guidance/fta-circulars/third-party-contracting-guidance</p> <p>See National Rural Transportation Assistance Program Procurement PRO website link. https://www.nationalrtap.org/Technology-Tools/ProcurementPRO</p>
G.	Americans with Disabilities Act	<p>(14) ADA Complaint Process: TRIBES does not have an ADA complaint process or advertisement of ADA requirements on its website. The Assessment Team discussed the development of a formal complaint process to be advertised to the public and accessible to individuals with disabilities. The Assessment Team discussed the prompt and equitable resolution of complaints, and the tracking and retention of each complaints. The Assessment Team discussed with TRIBES the development of a Transit website, and the inclusion of ADA complaint policy and procedures.</p> <p>https://www.nationalrtap.org/Technology-Tools/Website-Builder</p> <p>(15) Oversight of ADA General Service Provisions: The Assessment Team discussed the requirement to monitor its transit service for ADA Subpart G, general service provisions.</p> <p>(16) The Assessment Team discussed procedures for monitoring the ADA service provisions in its oversight checklist when conducting ride-a-longs or performing other oversight/supervisions of its transit services.</p> <p>See FTA Circular 4710.1 Americans with Disabilities Act, Chapter 2. General Requirements https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/Final_FTA_AD_A_Circular_C_4710.1.pdf</p>
H.	Drug and Alcohol Program	<p>(17) Drug and Alcohol Policy: The Assessment Team assisted TRIBES with developing a Drug and Alcohol Policy using the FTA Drug and Alcohol Policy Builder. The Assessment Team reviewed the details of the resulting Policy, highlighting various section of the policy. The Assessment Team reviewed the list of prohibited substances, covered employees, contact persons, post-accident and random testing procedures and consequences.</p> <p>(18) FTA Drug and Alcohol Resources: The Assessment Team reviewed the available resources on the FTA website, including training videos for safety-sensitive employees and supervisors, and forms and tip sheets.</p> <p>(19) Drug and Alcohol Management Information System: The Assessment Team discussed the requirement for submitting Drug and Alcohol Management Information System (DAMIS) reports summarizing drug and alcohol test results to FTA’s Office of Safety and Security annually.</p>

		<p>(20) Monitoring drug and alcohol testing vendors: The Assessment Team discussed the monitoring of the testing facilities, and service agents active certifications.</p> <p>See FTA Drug and Alcohol Tools and Resources – Policy Builder https://transit-safety.fta.dot.gov/DrugAndAlcohol/Tools/Default.aspx</p>
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Tribe XX
Summary Table of the TTP Technical Assistance Assessment
April 2-3, 2025

TTP Assessment Area	Technical Assistance Provided
<p><i>The Assessment Team discussed the following Assessment Areas and provided technical assistance as follows:</i></p>	
<p>A. Legal, Technical Capacity, and Award Administration</p>	<p>(1) Tribal Resolution and Opinion of Counsel – Update the legal documents to reflect current authorized Official (Tribal Chairman) and Attorney for submitting certifications and assurances. Upload updated Tribal Resolution and Opinion of Counsel to TRAMS recipient profile.</p> <p>(2) Delegation of Authority for User Roles in TrAMS – Update legal documents to reflect current delegation of authority to Transit Director to act on behalf of the Tribe as the authorized “Official” for submitting certifications and assurances, applications and executing awards.</p> <p>See sample Opinion of Counsel and Delegation of Authority attached to be edited as needed. The updated Tribal Resolution was submitted prior to issuance of this summary.</p> <p>(3) MPR Reporting – Discussed requirements for MPR reporting and emphasized that MPRs should correspond to FFRs submitted for the same period. Specifically, MPRs should contain the following:</p> <ul style="list-style-type: none"> • Current status of each open ALI within the active/executed grant. • A narrative description of projects, status, any problems encountered in implementation, specification preparation, bid solicitation, resolution of protests, and contract awards. • Actual completion dates for completed milestones. • Revised estimated completion dates when original estimated completion dates are not met. • Explanation of why scheduled milestones or completion dates were not met. Identification of problem areas and narrative on how the problems will be solved. • Analysis of significant project cost variances. <p>The Assessment Team discussed that Tribe XX should clearly describe/elaborate on the status of each ALI; the MPR is the official communication to all Federal award stakeholders. Further, Tribe XX emphasized the due date of annual</p>

		<p>MPR/FFR reports in October 30.</p> <p>See FTA Circular 5010.1F – <i>Award Management Requirements, Chapter III, 3. Reporting Requirements</i> for full list of MPR items https://www.transit.dot.gov/regulations-and-programs/fta-circulars/award-management-requirements-circular</p> <p>(4) Award Closeout – discussed requirement to closeout awards with 120 days after the end of the period of performance, or after all approved activities are completed and/or the applicable federal assistance has been expended for all eligible costs. At the time of the Assessment, Tribe XX had the following six awards that were ready for closeout:</p> <p>XX-2022-032, XX-202-059, XX-2021-029, XX-2017-014, XX-2020-061, and XX-2021-032</p> <p>See FTA Circular 5010.1F – <i>Award Management Requirements, Chapter III, 8. Award Closeout</i> for detail instructions on how to closeout an award in TRAMS.</p> <p>Attachments: Sample Opinion of Counsel Sample Delegation of Authority</p>
B.	Financial Management and National Transit Database	<p>(5) Available FTA funds – discussed the lack of ECHO draws. Since October 1, 2022, there have only been ECHO draws in the amount of \$381,006 and \$180 on September 8, 2023, and August 14, 2024, respectively. The Tribe has \$3,810,021 in available funds executed in awards, a combination of FTA and XDOT awards in TRAMS. In addition, the Tribe had not executed its annual apportionments in the amount of \$1,448,815, including lapsing funds in FY2025, as follows:</p> <p>FY2023 TTP Formula - \$463,327 (lapse on September 30, 2025) FY2024 TTP formula - \$662,565 FY2025 TTP formula - \$322,923 (partial)</p>
C.	Transit Asset Management	<p>(6) TAM Plan – Follow up with XDOT to ensure they update the State-sponsored TAM Plan with current data from the Tribe. Obtain a copy of the updated TAM Plan.</p>
D.	Satisfactory Continuing Control and Maintenance	<p>(7) FTA-funded Asset Inventory Record – discussed the requirements for maintaining an inventory record for FTA-funded assets with all required data elements. Update inventory record to include purchase date and price, and award number. This will be important when the asset is disposed.</p> <p>(8) Disposition Policies and Procedures (new requirements) –</p>

		<p>should be used by the Tribe when disposing of FTA funded assets.</p> <p>NEW Rule* on or after October 1, 2024. Disposition of equipment and supplies acquired using FTA funds is governed by both 2 CFR Part 200 and 49 U.S.C. 5334(h)(4)(B). Effective October 1, 2024, in accordance with updates to 2 CFR Part 200.313 and 200.314, if an item of equipment or aggregate unused supplies purchased with Federal assistance, and no longer needed for a transit purpose, are sold for \$10,000 or less, the recipient may retain the full proceeds from the disposition. If the proceeds are greater than \$10,000, then per 49 U.S.C. 5334(h)(4)(B) the recipient may retain \$5,000 and the percentage of the local share in the original Award of the remaining proceeds, with the remaining federal share returned to FTA. In either case, selling and handling expenses are not permitted to be deducted from the amount returned or in determining the sale proceeds. This applies to all dispositions on or after October 1, 2024. See FTA Circular 5010.1F <i>Chapter IV, 3. Equipment and Supplies</i> (including rolling stock)</p>
E.	Procurement and Buy America	To be discussed
F.	Americans with Disabilities Act	<p>(9) ADA and Title VI complaint process - discussed the requirements for an ADA complaint process as a TTP recipient. In addition, since the Tribe receives other FTA (non-TTP) funds, the Tribe is also required to have a Title VI complaint process. The Tribe had well-developed procedures for processing complaints in its Title VI Plan (for race, color and national origin) but did not cover persons with disabilities. Assessment Team recommended that the Tribe use the current complaint form and relabel the process and form “Non-Discrimination” complaint process/form and add “disability” as a category for discrimination complaints.</p> <p>FTA ADA Circular 4710.1 – The Assessment Team discussed the requirements for ADA complaint procedures. Reference <i>Chapter 12, 12.7 Transit Agency Complaint Process</i> for ADA compliant process requirements https://www.transit.dot.gov/regulations-and-guidance/fta-circular-47101-americans-disabilities-act-guidance</p> <p>NOTES: Tribe XX operated a deviated, fixed-route service open to the general public across its service area. All of Tribe XX’s vehicles were ADA accessible. All drivers were required to be certified in Passenger Assistance, Safety and Sensitivity (PASS), and driver training covered the required ADA service provisions (e.g., lift deployment and service animal policies).</p>

G.	Charter	No charter services performed.
H.	Drug and Alcohol Program	<p>(10) Drug and Alcohol Testing Policy – Tribe XX provided its Drug and Alcohol Program policy that contained the required provisions but also included other provisions under the Tribe’s authority. Assessment Team recommended to more clearly indicate which provision were for FTA D&A Program (perhaps by italicizing FTA requirements). Assessment Team shared the FTA Drug and Alcohol Policy Builder and other resource on FTA’s website. The Tribe indicated the required training had been conducted.</p> <p>See FTA’s Drug and Alcohol Program website at https://www.transit.dot.gov/drug-alcohol-program</p> <p>Drug and Alcohol Program Tools and Resources: https://transit-safety.fta.dot.gov/DrugAndAlcohol/Tools/Default.aspx</p>
I.	FTA Circulars	<p>(11) Updates to the FTA Circulars. The Assessment Team discussed that FTA recently updated several of its Circulars, including:</p> <ul style="list-style-type: none"> • Award Management Requirements (C 5010.1F) • Rural Areas Formula Grant Programs Guidance (C 9040.1H) • Enhanced Mobility of Seniors and Individuals with Disabilities Program Guidance (C 9070.1H) <p>The Circulars are posted to FTA’s website at https://www.transit.dot.gov/regulations-and-programs/fta-circulars/circulars and are effective November 1, 2024.</p> <p>See discussion of updated circulars in FTA’s Dear Colleague letter https://www.transit.dot.gov/regulations-and-programs/dear-colleague-letters/dear-colleague-letter-2-cfr-200-and-fy24-circular</p> <p>FTA has posted a series of prerecorded videos located at https://www.transit.dot.gov/regulations-and-programs/fta-circulars/fta-2024circular-update addressing summary grants management information and highlight the requirements outlined in each of the revised circulars.</p>

TTP Assessment Area		Technical Assistance Code	Technical Assistance Provided
A.	Legal, Technical Capacity, and Award Administration	<p>TTP L1-1: <i>Required forms and documents</i></p> <p>TTP T2-2: <i>MPR/FFR reporting</i></p> <p>TTP T-4-1: <i>Award closeouts</i></p>	<p>Assisted Tribe XX with updating its required forms and documents (Opinion of Counsel, Authorizing Resolution, Delegations of Authority, and/or ECHO-Web authorizations and certifications, etc.) using the templates provided in the FTA TrAMS and ECHO-Web User Manuals.</p> <p>Provided technical assistance to Tribe XX on the requirements for FFR and MPR reporting and reconciling FFRs and MPRs.</p> <p>Assisted Tribe XX with developing an award closeout plan. Advised the Tribe to work with the FTA regional office to execute award funds and close fully disbursed awards.</p>
B.	Financial Management and National Transit Database	TTP F2-1: <i>ECHO documentation</i>	Assisted the Tribe XX to develop procedures for documenting ECHO draws.
C.	Transit Asset Management		
D.	Satisfactory Continuing Control and Maintenance	<p>TTP SCC1-1: <i>Equipment records</i></p> <p>TTP SCC2-2: <i>Equipment disposal proceeds</i></p>	<p>Assisted Tribe XX with developing updated equipment records to include all of the required information.</p> <p>Assisted Tribe XX with new equipment and supply disposition requirements.</p>
E.	Charter Bus		
F.	Procurement and Buy America	TTP P1-2: <i>Procurement policies and procedures not evident</i>	Advised Tribe XX on developing procurement policies that include all required provisions. Provided examples as needed.
G.	Americans with Disabilities Act	TTP ADA-GEN1-1: <i>ADA complaint process</i>	Advised Tribe XX on developing an ADA complaint process.

H.	Drug and Alcohol and Drug-Free Workplace Act Programs	<p>TTP DFWA DA1-2: <i>Drug-Free workplace policy required elements</i></p> <p>TTP DFWA DA2-1: <i>Drug and alcohol policy required elements</i></p>	<p>Assisted Tribe XX with developing a DFWA policy that includes all required elements.</p> <p>Advised Tribe XX to use FTA's drug and alcohol Policy Builder tool to develop a drug and alcohol policy that complies with FTA requirements.</p>
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