



Key COVID-19-Related Questions for FTA

CTAA held a series of Town Hall sessions with nearly 600 members on Wednesday, March 18. We broke up the discussions into three groups: Small-Urban, Rural/Tribal, Specialized/Paratransit/NEMT. What follows is a summary of questions our members posed that require assistance from FTA. We've grouped them by topic.

Deadline Extensions

- Will Triennial (State Management) reviews be rescheduled or completed via conference calls if currently scheduled in the next 90 days?
- Will FTA extend due dates for grant applications like Section 5339 competitive funds?
- Will FTA extend the Public Transit Agency Safety Plan deadline?
- Can FTA waive off the next (and maybe the next two) NTD reporting period(s)? Agencies have sent most admin staff home until at least April 8th. Similarly, data will not be relevant to their normal circumstances.
- For the purposes of STIC funding, what can FTA do to nullify the impact of ridership declines and service reductions for small-urban operators that depend on the investment they get through STIC?

Regulatory Clarifications and Relief

- Can the FTA provide relief from Title VI and ADA regulations of no denials on rides, during the pandemic? Can transit systems restrict paratransit trip purposes?
- Numerous CTAA members in communities of all sizes have questions about prioritizing trips and any special guidance FTA can provide to transporting riders who exhibit symptoms of being

infected? As drive up testing sites begin popping up throughout the country, will paratransit be required to transport ADA passengers who want to be tested?

- Many Section 5310 subrecipients are being tasked with delivering meals, food, and medications to elderly persons and individuals with disabilities who are staying home on account of their compromised health or other concerns that prevent them from leaving their homes. Can FTA clarify that the "incidental use" of Section 5310 equipment for things such as meal delivery to homebound individuals extends to these types of life-sustaining services, especially since many communities' volunteer services and senior centers have closed down since the onset of this pandemic?
- Can FTA's provision that allows Section 5310 and 5311 subrecipients to provide meal delivery to homebound individuals be extended to become applicable to Section 5307 recipients who are being asked by local agencies and officials to use their vehicles to deliver groceries, medications, etc., to homebound individuals during this national medical emergency?
- Is there flexibility in using 5311 and 5310 funding to provide access to food and medicine for people who are quarantined? Many members expressed that they would like to bring food and medicines to people instead of bringing people to grocery stores and pharmacies.
- Has there been discussion about a waiver of procurement requirements? With supply shortages, typical 3-price, bid, etc. is not in the public's best interest.
- Rural transit providers are observing their Drug & Alcohol testing facilities becoming inactive, meaning tests cannot be performed. Is there consideration for this? What about relief from random screenings.
- Beyond what's already been done regarding local share relief, has FTA given any thought to further relief from local match — or at the very least can additional local share relief apply to all funding coming through any supplemental transit appropriations?
- Regarding what FTA has already announced on local share relief: Is the intent to allow only operation expenses directly related to COVID-19-related services or can this be done as a means of reimbursing all operating cost that are incurred by the operator, during the State of Emergency?
- Are drivers able to get an extension on their DOT physical if they cannot get an appointment?
- There is a concern that the loss of revenue would directly affect the farebox Ratio. Can there be some relief from the requirement?

Cleaning and Health Safety Supplies

- Has there been any discussion regarding improved access to cleaning and health care supplies for transit systems that are part of the emergency response system and those continuing to serve at-risk passengers (i.e. dialysis patients) during this crisis? Many CTAA members cannot get the supplies they need (heard about cleaning equipment, masks, etc.).
- Can FTA provide clear guidance on what products to use to clean vehicles and how often it needs to be done?

Front-Line Transit Staff

- Many members voiced concerns about paying drivers if/when service is reduced, will this be a covered expense by FTA?
- Some members are considering furloughing drivers in their 70s/60s who are not sick but at higher risk, yet keep them on payroll. Does an employee have to have an active case to receive paid leave?
- One member is considering having dispatchers/schedulers work from home and having drivers start their routes at home. How can that agency manage the handling of reasonable suspicion requirements for the safety sensitive groups in this new (and temporary) work environment?
- For CTAA members that utilize volunteer drivers, can volunteer reimbursements be treated similarly to driver pay in terms of covered expenses during the crisis?