

From: [Brumfield, Ryan M](#)
Cc: [Freitag, Carolyn M](#); [Vine-Hodge, John A](#); [Freeman, Myra S](#); [DiGiovanni, Pamela M](#); [Chambers, Blair](#)
Subject: RE: DHHS Funding for Transportation to Vaccine Sites
Date: Wednesday, February 17, 2021 11:52:54 AM
Attachments: [image001.png](#)
[DHHS Guidance Coronavirus Relief Fund - Vaccine Transportation 02-01-21.docx](#)

Good Morning,

We wanted to share supplemental guidance with you all regarding the recently distributed DHHS funding for transportation to/from vaccine sites.

These funds are provided through DHHS, not FTA. Therefore, there are some nuances to keep in mind regarding federal requirements:

- The DHHS funding is primarily governed by the requirements of [2 CFR 200](#) which also applies to all FTA funding and should, therefore, be familiar to you. FTA funding has additional requirements beyond 2 CFR 200, including those found in [49 CFR](#) and related [circulars](#).
- Like FTA, DHHS funding has requirements in addition to 2 CFR 200. Pertinent requirements are generally summarized in the DHHS funding guidance document provided previously (attached again here for reference). Documentation of compliance is largely accomplished through submission of claims and supporting documentation.
- If DHHS funding is combined with any FTA funding or if FTA-funded assets are used to provide services, 2 CFR 200, DHHS grant requirements, plus additional FTA requirements apply (e.g, drug and alcohol testing, driver training, ADA, Title VI, etc.).
- In situations where no FTA-funded assets are utilized and the DHHS funding is not being mixed with any FTA funding to purchase or provide services (e.g., subsidizing Uber, Lyft, taxi, or other private providers), 2 CFR 200 and DHHS requirements apply, but FTA requirements generally do not apply.

Given these nuances, our advice is to treat the DHHS funding the same way you would treat FTA funds, unless you are using the funds on an activity that is clearly distinguishable and independent from FTA-funded assets and activities. Keep in mind that the use of this funding is subject to compliance review and audit by IMD, DHHS, or other state or federal entities at any time in the future.

As a reminder, per [FTA COVID-19 FAQ](#) CE18, the use of transit assets to provide non-public transportation service (non-shared ride or closed door) related to COVID-19 vaccination is eligible as an incidental use. We will provide additional guidance in the near future regarding charter reporting for any incidental uses. The next charter report is due by 4/15.

Please let us know if you have any questions or concerns.

Thanks,

Ryan

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From: Brumfield, Ryan M
Sent: Wednesday, February 3, 2021 7:16 AM
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Subject: DHHS Funding for Transportation to Vaccine Sites

Good Morning Transit Partners,

This email provides information regarding DHHS Coronavirus Relief Funding to support trips to vaccine sites. As announced previously, DHHS has provided NCDOT with \$2.5M to assist transit systems with providing rides to citizens who need transportation to vaccination locations. Please visit our webpage [Transportation to COVID-19 Vaccine Sites](#) for more information about this effort.

The attached spreadsheet titled “DHHS Funding for Vaccine Transportation Disbursement Amounts” shows the amount each system will receive in new funding. We anticipate distributing this funding by the end of the week. Also attached is program guidance which includes eligibility information, claim submittal instructions, and other important details. The final attachment is the DHHS reimbursement form which must be attached to your claim submittals. As a reminder, please submit your data and claims here: [Vaccine Transportation Weekly Progress Report & Claims Submission](#). Refer to the January 28th email from Blair Chambers for more information.

Systems who also received DHHS funding last year, please read the rest of this email.

In November 2020, DHHS provided IMD with CARES Act funding for thirty-four economically distressed (Tier 1) counties to cover ROAP-eligible trips. The new DHHS funding for vaccine transportation is an extension of the same funding source. Therefore, in order to determine disbursement amounts for the new funding, we had to fully reconcile all claims from the first round of funding.

Transit systems who received round one funding fall into one of three scenarios based on the reconciliation process:

1. Funds remaining.
2. All funding expended and claims submitted above the amount provided (“overages”).
3. All funding expended and no overages.

Last year we committed to transit agencies that we would cover some overages by redistributing unexpended funds from other systems. We think it is important to honor this commitment to the extent possible. To do so, we will use the following approach:

- **No fund balance and no overages** – Systems with no overages or unspent funds will receive their new DHHS funding for vaccination transportation without adjustments.
- **Fund balance** – Systems with remaining funds keep their funds and must use them exclusively to support transportation to vaccination sites. Their 2nd DHHS disbursement will be reduced accordingly.
 - Systems with more funds remaining than their proposed 2nd disbursement amount will be invoiced for the difference. Invoices will be sent out from DOT’s fiscal section soon and systems will have 30 days to repay the amount.
- **Claim overages** – Systems with overages from the first round will receive new DHHS funding to cover the overages, plus an additional disbursement exclusively for vaccination transportation support.
 - Overages will only be covered up to double the initial disbursement. Overages more than double will be provided through future CARES Act funding.
 - A portion of overages will be paid immediately through the new DHHS funding. The remainder will be paid in approximately 6-8 weeks after invoiced funds are received from other systems.

The second tab on the “DHHS Funding for Vaccine Transportation Disbursement Amounts” spreadsheet (titled “Working”) reflects this approach and the implications for each system.

Please direct any follow up questions to your planner or to me directly.

Thank you,

Ryan

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**NORTH CAROLINA DEPARTMENT OF
TRANSPORTATION**



**DHHS Coronavirus Relief Funds
Vaccine Transportation
Program Guidance**

North Carolina Department of Transportation
Integrated Mobility Division
February 1, 2021

Introduction

On Friday, March 27, 2020, President Trump signed the Coronavirus Aid, Relief, and Economic Security (CARES) Act into law. The CARES Act provides emergency assistance and health care response for individuals, families and businesses affected by the COVID-19 pandemic and provides emergency appropriations to support Executive Branch agency operations during the COVID-19 pandemic.

This guidance outlines the availability and eligibility of federal Coronavirus Relief Funds (CRF) appropriated to the NCDHHS by the North Carolina General Assembly under Session Law 2020-4, Section 3.3 (27) for flexible use. Using the Rural Operating Assistance Program (ROAP) structure, the transit system shall use the transferred funds to meet the transportation needs to provide transportation services to vaccine site those individuals who want to receive the vaccine and an attendant or helper. The expenditure of the transferred funds may only be used for trips to vaccine sites.

Eligible Applicants Eligible Activities and Reimbursement

All counties in North Carolina will receive a disbursement of DHHS CARES Act (CA) funding to perform the vaccine-site trips. This funding shall only be used for transportation to or from COVID-19 vaccine providers for the purposes of an individual either receiving a COVID-19 vaccine or assisting someone who is receiving a vaccine. A formula to equitably disburse the funds will be used.

Eligible Activities

Trip Based Services - Trips may be provided by car/vanpool, taxi, public transit vehicle, private transit vehicle, agency vehicle, or mileage reimbursement to a volunteer. The most cost-effective option should be chosen. Public /Private transportation providers shall be reimbursed based on the fully allocated cost per mile, per hour, or per passenger trip. A public transit system may also dedicate a vehicle for daily service to vaccine sites and request reimbursement on a vehicle-per-day basis. Volunteers can be reimbursed for mileage only. If a human service agency uses an agency vehicle to provide the trip, the agency must include the fully allocated cost of a trip in their reimbursement request including fuel, staff time and benefits, depreciation, vehicle insurance and licensing.

The DHHS CA grant will reimburse systems for 100% of the net operating expenses. Net operating expenses are those expenses remaining after the provider subtracts operating revenues from eligible operating expenses. Operating revenues must include farebox revenues. Farebox revenues include fares paid by riders who are later reimbursed by a human service agency or other user-side subsidy arrangement. Farebox revenues do not include payments made directly to the transit system by human service agencies to purchase service. However, purchase of transit passes or other fare media for clients would be considered farebox revenue. A voluntary or mandatory fee that a college, university, or similar institution imposes on all its students for free or discounted transit service is not farebox revenue. Farebox revenue must be used to reduce total operating expenses (treated as revenue).

Net Operating Expenses = Total Eligible Operating Expenses – Fare Revenues

Note: Income from contracts to provide human service transportation may be used either to reduce the net project cost (treated as revenue) or to provide local match for operating assistance. In either case, the cost of providing the contract service must be included in the total project cost.

Reimbursement and Data Collection: Reimbursement will be made on the DHHS claim form using line F: Transportation – Recipient. A copy of the form is provided in this program overview package. Back-up documentation from the transit system's scheduling software and/or invoices for contracts with full detail on trips provided must be attached to the reimbursement claim. Data collection will also be required and IMD has created a tool to assist with this activity. All requests for reimbursement will be reviewed by IMD before submitting them to DHHS.

As the effort to help provide transportation to vaccine sites gets underway, tracking the amounts of trips, miles traveled, riders taken to vaccine sites and amount of DHHS CARES money used to complete this effort could not be more important. We have created a data entry tool that will allow you to submit both your data and your claim documentation together or separately.

You will need to make your entries on a **weekly** basis for period ranging from Saturday through the next Friday. The due dates for the weekly report are as follows:

- Data - submitted by Close of Business every Tuesday.
- Claims - turn in your claims as soon as you can.
- Note - It is preferred that you submit them at the same time if you are able.

For this initial submission period, please submit all previous weeks of data and claims for trips already provided to vaccine sites as soon as you can.

Below are the instructions to submit weekly reports for data, claims, or both:

1. Select the Entry Survey link here: [Vaccine Transportation Weekly Progress Report & Claims Submission](#)
2. The Form starts out with one question you will need to choose from:
 - a. I am Reporting Data Only
 - b. I am Submitting Claims Only
 - c. I am Reporting Data and Submitting Claims
(Once again, if you have enough information in order to do both, that is preferred. If you have your data, but not enough info to submit claims, please at least submit the data and come back to add your claims when you are able.)
3. For the data portion, the following data is requested:
 - a. Total Miles
 - b. Total Trips
 - c. Total Riders getting vaccines
 - d. Total Riders giving assistance (not vaccinated)
 - e. Hours Operated
 - f. Vehicles Dedicated (Optional)
 - g. Estimated Expenditures (only if you are not also submitting your claims yet)
4. For submitting claims, (only for DHHS CARES funds) the following supporting documentation must be attached:
 - a. Cover Letter
 - b. DHHS Claim Form (if using DHHS CARES Funds) – Use Budget Line F only.
 - c. NCDOT Claim Coversheet
 - d. DBE Form
 - e. Additional Supporting Documentation
 - f. Back-up Report from Scheduling Software
5. For submitting both together, the requested information is all of the above with exception to duplicative questions.

***Remember you will only use the claims portion for DHHS CARES claims only. If you use other funds (FTA CARES, traditional funds, etc.), you will use the normal claims process.**

Visit our webpage [Transportation to COVID-19 Vaccine Sites](#) to access more resources regarding this effort.

If you have any questions, please contact your Planner.

Period of Performance

IMPORTANT: This application for DHHS Coronavirus Aid, Relief, and Economic Security funds covers a 6-month period, with the period of performance from December 30, 2020 to June 30, 2021. Funds must be spent by June 30, 2021.

Program Monitoring, Oversight, and Exclusions

The Planners from the N.C. Department of Transportation will provide technical assistance, and monitor the implementation of the project. The list of Planner assignments is at the end of this application booklet.

Claim rate will be monitored closely to ensure funding is being utilized expeditiously. If a transit agency is not submitting claims and not utilizing the funding, DOT reserves the right to invoice the agency to return the funding for use by another agency.

Performance Metrics and Expected Outcomes:

The transit system shall adhere to the requirements included in the scope of services including the performance measures in the chart below.

Measure	Target to Be Achieved
Number of individuals served	50,000 or more
Number of transportation legs provided	100,000 or more
Percentage of funds expended	<ul style="list-style-type: none">• 50% of funds expended on or before April 15, 2021• 100% of funds expended on or before June 30, 2021

Exclusions:

Matching activities for other Federal funds are not allowed. Services shall only be reimbursed once, and not for duplicative services. Please contact your Planner for further information.

Submitting Claims

Claims for DHHS CARES funds must be accompanied by documentation supporting expenses for trips being reported. The DHHS Claims form is attached with this guidance and it can be found on the NCDOT Connect website at:

<https://connect.ncdot.gov/business/Transit/Pages/Transit-Reports.aspx>. The Authorized Representative (AO) certifies that the funds were spent on the eligible activity of providing trips to vaccine sites and the AO must be the person who signs the claim form.

As the effort to help provide transportation to vaccine sites gets underway, tracking the amounts of trips, miles traveled, riders taken to vaccine sites and amount of DHHS CARES money used to complete this effort could not be more important. We have created a data entry tool that will allow you to submit both your data and your claim documentation together or separately.

You will need to make your entries on a weekly basis for period ranging from Saturday through the next Friday. The due dates for the weekly report are as follows:

- Data - submitted by Close of Business every Tuesday.
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3. For the data portion, the following data is requested:
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4. For submitting claims, (only for DHHS CARES funds) the following supporting documentation must be attached:
- a. Cover Letter
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 - c. NCDOT Claim Coversheet
 - d. DBE Form
 - e. Additional Supporting Documentation
 - f. Back-up Report from Scheduling Software
5. For submitting both together, the requested information is all of the above with exception to duplicative questions.

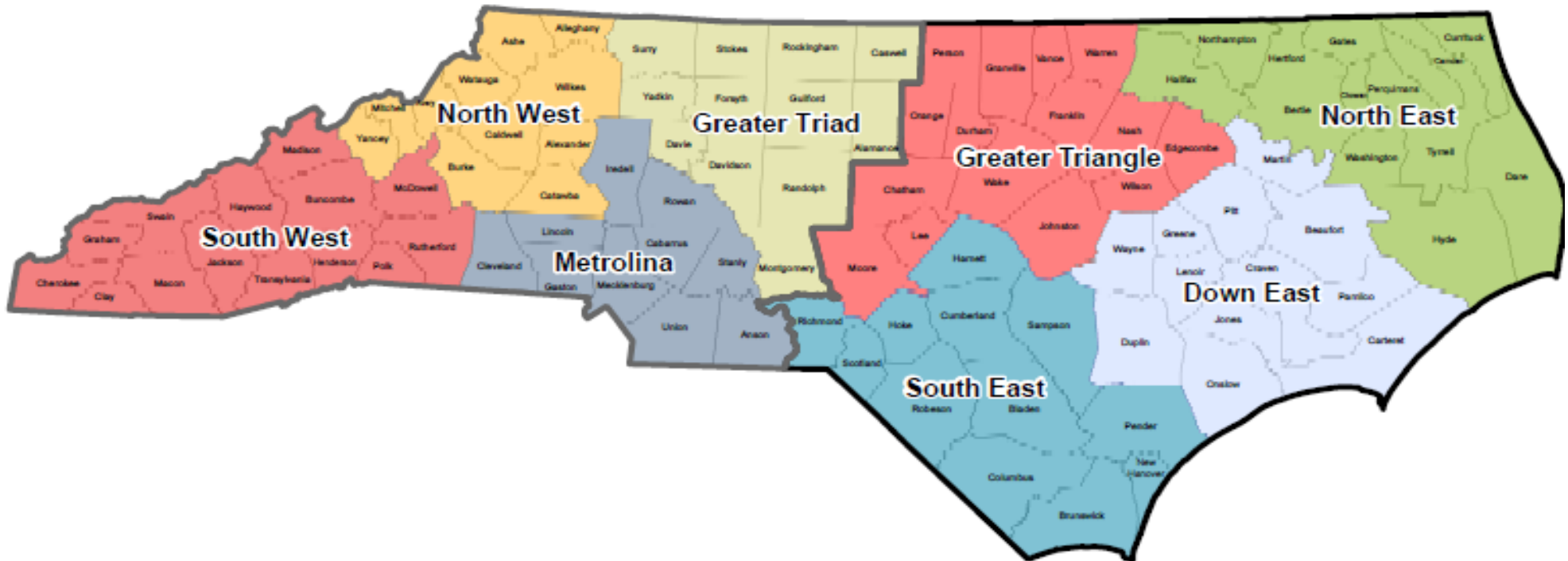
***Remember you will only use the claims portion for DHHS CARES claims only. If you use other funds (FTA CARES, traditional funds, etc.), you will use the normal claims process.**

Visit our webpage [Transportation to COVID-19 Vaccine Sites](#) to access more resources regarding this effort.

If you have any questions, please contact your Planner.

IMD Planner Responsibility List

NCDOT Integrated Mobility Division Western & Eastern Sub-Region Contacts



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Eastern Regions

Interim Supervisor: Kathryn Zeringue

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