

FY 2020 HP-CMV and HP-ITD Funding Webinar - January 28, 2020

Questions from the Q&A Pod

1. Is the state lead agency the only eligible applicant for ITD?

Response: No. However, you have to be either mentioned as a partner in the approved PP/TLD or indicate you have coordinated with the lead agency.

2. What is the process if we had the Title VI Program Compliance Plan approved by you in 2018? Is it the same as what is now being discussed by Lester? Thank you.

Response: I will coordinate with you to ensure that the FY 2018 Title VI Program Compliance Plan is updated for my FY 2020 review and approval. Please contact me at your earliest convenience and I will be happy to coordinate the update of the Plan.

3. Where is Title VI in the NOFO?

Response: At present, the FMCSA NOFO does not include language regarding the FMCSA Title VI Program requirements. However, Applicants are required to meet the FMCSA Title VI Program requirements and FMCSA may not award a grant in the absence of a FMCSA-approved Title VI Program Compliance Plan for FY 2020.

4. Is a plan required to be submitted with the grant request?

Response: No. So long as the Applicant has received a Title VI Program Compliance Plan approval letter for FY 2020 from me, the Applicant has satisfied the FMCSA Title VI Program requirements for FY 2020.

**** Please note: All Title VI documents should be sent directly to Lester.Finkle@dot.gov. Please do not include the document in the application package.**

5. Is Lester proactively sending out the documents that need to be updated?

Response: Having reviewed 156 Plans during FY 2019, I cannot guarantee that I will be able to contact each Applicant. Please contact me and I will be happy to coordinate the Plan update with you.

6. So if we had an approved plan for last year's application we just need to update signatures?

Response: The Policy Statement and Assurance will need to be re-signed/re-dated by the CEO. Additionally, certain sections may need to have updated information added to the Plan. Please contact me and I will be happy to review the Plan with you to identify any information which will need to be updated. Also, I have requested a copy of the Title VI Complaint Log and the 2019 Training Record/Log for FY 2020.

7. The in-kind match, can it be from the applicant with non-federal funds for a correlating project? Not a 3rd party.

Response: More details would need to be provided to answer specifically. Please see section **7.8 Match and Third-Party In-Kind Contributions** page 87 of the MCP and 2 CFR 200 for guidance.

<https://cms8.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/docs/mission/grants/73001/motor-carrier-grant-comprehensive-policy-v31.pdf>

8. Does a PP/TLD plan ever need to be renewed?

Response: Not unless you are asking to fund a project that is not in the approved PP/TLD. The ITD Program Office suggests the PP/TLD be re-visited at least once every 5-years due to changes in technology.

9. Are approved Title VI plans required for every state agency (in addition to the lead agency) that could receive a portion of the grant?

Response: Yes. If a direct recipient of FMCSA funds then passes along a portion of these funds to another recipient, then the sub-recipient is required to submit a Title VI Program Compliance Plan (with a signed/dated Assurance) to the recipient. I will be happy to provide technical assistance regarding the development of the Plan by the sub-recipient. Please contact me to let me know how I may be of assistance.

10. Appendix A, Application Checklist, page 3 lists Standard Title VI Program Assurance and Plan as the last item to be included in Grants.gov. My understanding from Mr. Finkle is that it doesn't have to be included in the application. Please clarify.

Response: Correct, the Title VI plan should not need to be included. The item was inadvertently left in the check list and has been corrected. [All Title VI documents should be sent directly to Lester.Finkle@dot.gov.](#)

11. So is the approval letter the one that the state has received from FMCSA for the state's current PP/TLD?

Response: Yes

12. Are there any requirements for when a project within the grant application must start? Either before or after 9/30/20?

Response: The actual start date would be dependent on the award date. The project plan can be submitted with estimated dates then modified if/when an award is made.

- **HP-CMV** - Period of performance is the FY of award plus two years.
- **HP-ITD** - Period of performance is the FY of award plus five years.

13. Can the state use an in-kind match of normal utilities and building maintenance costs, as an in-kind match for a grant?

Response: These types of expenses are not eligible unless they are included in the approved indirect cost rate. Please see the MCP Consolidated Cost Eligibility Table, for eligible costs (link provided above). Please note the cost eligible table is not all inclusive. Please see the 2 CFR 200 for additional information.

14. If we have a project with different locations, is it considered multiple projects. For example virtual weigh stations in two locations.

Response: No, this would not be consider as separate project unless the purpose of the individual weigh states are different.

15. If the project is already approved in the PP/TLD, but want to add more of the same items which would give a new timeline and budget, etc. Do we need to update PP/TLD before the grant submits?

Response: If a project is laid out in the approved PP/TLD and alludes to this project model being used in multiple locations that is ok, so long as the technology doesn't change location to location. Or that connections to FMCSA systems change. A project in an application would refer to the PP/TLD project being undertaken.

16. With multiple projects submitted...does the 35 page limit still apply?

Response: Yes. The 35 limit is per project. If there are two projects each project can be up to 35 pages.

17. My state has been obtaining PRISM funding as a subgrantee for the state MCSAP partner. This is because a couple of year ago it was noted that this is a discretionary grant and an SDLA may not be guaranteed funding unless they go the subgrantee route. Is this still accurate?

Response: Yes. Refer to the grant eligibility summary table at this link:
<https://www.fmcsa.dot.gov/information-systems/prism/prism-archive-library>

18. Can you provide examples of eligible O&M projects?

Response: Please go to section **5.2 Use of MCSAP Funds for Operations and Maintenance** for description:
<https://cms8.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/docs/mission/grants/73001/motor-carrier-grant-comprehensive-policy-v31.pdf>

19. Does priority C include expanding PRISM processes to "intrastate" CMVs?

Response: A general underpinning of PRISM is to invoke State vehicle registration sanctions against motor carriers that have been placed out-of-service by FMCSA. In general, only interstate motor carriers are subject to Federal jurisdiction and FMCSA out-of-service orders. Therefore, interstate motor carriers that are not covered under the International Registration Plan (IRP) are considered a higher priority for expanded PRISM.

20. In the previous section it states "applicant must clearly demonstrate how these projects will go beyond traditional traffic enforcement projects" Can you please explain what that means?

Response: For Lead MCSAP agencies, an HP project must not be a continuation of an approved CVSP project. For example if there is a distractive driving enforcement project approved in the CVSP, the HP project would need to include different distractive driving enforcement activities.

21. Please confirm the term of the award as far as being 2 federal years plus the time in the federal year from the time of the award, and in all awards ending Sept 30, 2020.

Response: For HP-CMV, the period of performance is the fiscal year of award plus two additional fiscal years. For example if the HP-CMV award was made in August 2020, the grant period of performance would be during August and September, which is the end of FY2020, all of FY2021 and FY2022. A Federal Fiscal year starts on October 1 and goes through September 30.

22. If I want to incorporate section C i) targeting unsafe driving and iii) improve CMV safety and compliance. Is that technically 2 separate projects requiring separate proposals?

Response: Not necessarily. A project can include one or more of the priorities under section C, Enforcement of CMV Operation and Compliance with Safety Regulations.

23. Under what section can we apply for the travel expense to attend safety related meetings and workshop such as CVSA or FMCSA safety related meetings

Response: For conference attendance eligibility it depends on whether the entity is a MCSAP Lead agency or not. Please go to page 95 of the MCSAP Comprehensive Policy (MCP) for full details.

<https://cms8.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/docs/mission/grants/73001/motor-carrier-grant-comprehensive-policy-v31.pdf>

24. Period of performance - just to clarify, Budget should not be broken out for each separate year?

Response: Correct. Each project plan must reflect a timeline which covers complete project for the total period of performance.