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FEDERAL TRANSIT ADMINISTRATION

Progress and Challenges in Implementing and Evaluating the Job Access and Reverse Commute Program

GAO

Accountability * Integrity * Reliability

GAO-09-496

Highlights of GAO-09-496, a report to congressional committees

FEDERAL TRANSIT ADMINISTRATION

Progress and Challenges in Implementing and Evaluating the Job Access and Reverse Commute Program

Why GAO Did This Study

Established in 1998, the Job Access and Reverse Commute Program (JARC)–administered by the Federal Transit Administration (FTA)—awards grants to states and localities to provide transportation to help low-income individuals access jobs. In 2005, the Safe, Accountable, Flexible, Efficient Transportation Equity Act—A Legacy for Users (SAFETEA-LU) reauthorized the program and made changes, such as allocating funds by formula to large and small urban and rural areas through designated recipients, usually transit agencies and states.

SAFETEA-LU also required GAO to periodically review the program. This second report under the mandate examines (1) the extent to which FTA has awarded JARC funds for fiscal years 2006 through 2008, and how recipients are using the funds; (2) challenges faced by recipients in implementing the program; and (3) FTA's plans to evaluate the program. For this work, GAO analyzed data and interviewed officials from FTA, nine states, and selected localities.

What GAO Recommends

GAO recommends that DOT (1) determine actions FTA or Congress could take to address challenges agencies have encountered and (2) ensure that program evaluations use generally accepted survey design and data analysis methodologies. DOT officials reviewed a draft of this report and commented that the report should include additional information on FTA's progress in implementing and evaluating the program; this information has been incorporated throughout the report.

View GAO-09-496 or key components.
For more information, contact David Wise, (202) 512-2834 or wised@gao.gov.

What GAO Found

FTA is making progress in awarding funds and has awarded about 48 percent of the $436.6 million in JARC funds apportioned for fiscal years 2006 through 2008 to 49 states and 131 of 152 large urbanized areas. Recipients plan to use the funds primarily to operate transit services. However, about 14 percent of fiscal year 2006 funds lapsed. According to FTA officials, these funds lapsed for several reasons. For example, some applicants did not meet administrative requirements in time to apply for funds. FTA officials are working with states and localities to reduce the amount of funds that lapse in the future. Recipients plan to use 65 percent of fiscal year 2006 funds to operate transit services, 28 percent for capital projects, and 7 percent for administrative costs.

States and local authorities GAO interviewed cited multiple challenges in implementing the JARC program; a common concern is that, overall, the effort required to obtain JARC funds is disproportionate to the relatively small amount of funding available. One challenge cited by recipients was that FTA's delay in issuing final guidance and the process to identify designated recipients reduced the time available to secure funds before the funds expired. In addition, although recipients considered the coordinated planning process beneficial, many cited factors that hindered coordination, including lack of resources and the reluctance of some stakeholders to participate. Moreover, although the JARC program requires human service providers to be included as stakeholders, other transportation planning requirements do not, complicating the coordinated planning process. Some designated recipients also expressed concerns about identifying stable sources of matching funds and duplicative efforts in administering JARC with other FTA programs. These challenges have delayed applications for funds and project implementation, and contributed to the lapse in fiscal year 2006 funds.

Although FTA has not completed an evaluation of the JARC program under SAFETEA-LU, recipients we spoke with indicated that projects have benefited low-income individuals by providing a means to get to work. Since 2000, FTA has refined its approach for evaluating the program and currently has two studies under way to evaluate the JARC program under SAFETEA-LU. However, both studies may have limitations that could affect FTA's assessment of the program. One of these studies—due in September 2009—will evaluate projects using FTA's performance measures; specifically, the number of rides provided and number of jobs accessed. However, collecting reliable data for these measures is problematic, particularly for the number of jobs accessed. The other study—due in the spring of 2010—will include results of a survey of JARC recipients and individuals using JARC services and will focus on the program's impact on those using the services. However, this study will use a methodology similar to that used in a prior study which had limitations in the survey instrument design and data analysis. FTA does not have a comprehensive process in place to assess whether its researchers use generally accepted survey design and data analysis methodologies.

Contents

Abbreviations

AASHTO	American Association of State Highway and Transportation Officials
APTA	American Public Transportation Association
AARA	American Recovery and Reinvestment Act
DOT	Department of Transportation
FTA	Federal Transit Administration
JARC	Job Access and Reverse Commute
LEHD	Longitudinal Employer-Household Dynamic
MPO	metropolitan planning organization
SAFETEA-LU	Safe, Accountable, Flexible, Efficient Transportation Equity Act—A Legacy for Users
TANF	Temporary Assistance for Needy Families
TEA-21	Transportation Act for the 21st Century
TEAM	Transportation Electronic Awards Management
UIC	University of Illinois at Chicago

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Accountability * Integrity * Reliability
United States Government Accountability Office
Washington, DC 20548

May 21, 2009

The Honorable Christopher J. Dodd
Chairman
The Honorable Richard C. Shelby
Ranking Member
Committee on Banking, Housing, and Urban Affairs
United States Senate

The Honorable James L. Oberstar
Chairman
The Honorable John L. Mica
Ranking Republican Member
Committee on Transportation and Infrastructure
House of Representatives

Access to adequate transportation is critical to enabling low-income individuals to find and retain employment. To address this issue, Congress established the Job Access and Reverse Commute (JARC) program in 1998.[1] Administered by the Federal Transit Administration (FTA), JARC provides grants to states and localities to fill gaps in transportation services for low-income individuals needing access to jobs and related services, such as child care and training. In 2005, Congress reauthorized JARC through the Safe, Accountable, Flexible, Efficient Transportation Equity Act—A Legacy for Users (SAFETEA-LU), and authorized $727 million for the program for fiscal years 2005 through 2009. SAFETEA-LU made a number of changes, the most significant of which changed JARC from a discretionary to a formula program. JARC funding may be spent on operating projects, such as new or expanded transit services that could include bus routes, van pool services, and commuter rail services, or on capital projects, which include mobility management services[2] and equipment purchases. SAFETEA-LU required that the Department of Transportation (DOT) evaluate the effectiveness of the JARC program and

[1]Section 3037 of Pub. L. No. 105-178.

[2]Mobility management services consist of activities for delivering coordinated transportation services to customers, including elderly individuals, people with disabilities, and lower-income individuals. These services focus on meeting individual customer needs through a wide range of transportation options and service providers and do not include operating public transportation services.

report the results to the House Committee on Transportation and Infrastructure and the Senate Committee on Banking, Housing, and Urban Affairs by August 2008. FTA submitted a report to Congress on the JARC program in January 2009.

SAFETEA-LU also requires GAO to study the JARC program 1 year after the legislation took effect and every 2 years thereafter. This report—the second in response to the mandate—analyzes FTA's progress in implementing changes to the JARC program. Our specific reporting objectives were to determine:

- The extent to which FTA has awarded available funds for fiscal years 2006 through 2008, and how recipients are using these funds since SAFETEA-LU went into effect.
- The challenges recipients have faced in implementing the JARC program.
- How FTA plans to evaluate the program.

To address these objectives, we reviewed relevant laws and regulations and interviewed FTA officials, JARC recipients, and stakeholders. We obtained and analyzed data from FTA's Transportation Electronic Awards Management (TEAM) System to determine the extent to which FTA awarded JARC funds, and assessed the reliability of these data. We determined that the data were sufficiently reliable for the purposes of our report. To examine how recipients have used JARC funds since SAFETEA-LU went into effect and challenges recipients have encountered in implementing the program, we interviewed 26 designated recipients and 16 subrecipients.[3] We selected the designated recipients based on criteria that included states and large urbanized areas receiving an increase or a decrease in JARC funds as a result of changing to the formula program, states we interviewed for our November 2006 report,[4] and states FTA and

[3]Designated recipients are state and local agencies that have been designated to administer and distribute JARC funds to local agencies. Under SAFETEA-LU, state agencies are required to be designated recipients for small urbanized and rural areas, while local agencies are identified as designated recipients for large urbanized areas. Designated recipients award JARC funds to subrecipients, which are local transit agencies, non-profit organizations, or local government authorities that receive JARC funds for eligible transit projects.

[4]GAO, *Federal Transit Administration: Progress Made in Implementing Changes to the Job Access Program, but Evaluation and Oversight Processes Need Improvement*, GAO-07-43 (Washington, D.C.: Nov. 17, 2006).

industry association officials suggested. We selected subrecipients that covered the three areas that were apportioned JARC funding under SAFETEA-LU—large and small urbanized as well as rural areas[5]—as well as those that designated recipients recommended. Since we used a nongeneralizable sampling approach, the results of these interviews cannot be used to make inferences about all designated recipients and subrecipients. We also interviewed local stakeholders and officials from industry associations, including the American Association of State Highway and Transportation Officials (AASHTO), the American Public Transportation Association (APTA), the Community Transportation Association of America, and the National Association of Regional Councils to obtain their views on challenges associated with implementing the JARC program. Furthermore, to identify challenges faced by human services agencies associated with the coordinated human services transportation planning process, we interviewed officials from the U.S. Department of Labor and U.S. Department of Health and Human Services, and associations representing elderly and disabled persons, including Easter Seals, the Association of Programs for Rural Independent Living, and AARP. To determine how FTA plans to evaluate the JARC program, we reviewed previous evaluations and interviewed officials from FTA and two contractors that are evaluating the program. For each evaluation, we assessed the contractor's scope and methodology using standard survey and economic principles and practices as criteria. We also interviewed designated recipients, subrecipients, and other state and local officials to obtain their perspectives on FTA's JARC performance measures. See appendix I for additional information on our scope and methodology.

We conducted this performance audit from May 2008 to May 2009, in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence provides a reasonable basis for our findings and conclusions based on our audit objectives.

[5]Large urbanized areas are defined as urbanized areas with a population of more than 200,000. Small urbanized areas are defined as urbanized areas with a population of between 50,000 to 199,999. Rural areas are defined as areas having a population of less than 50,000.

Background

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 significantly changed the system for providing assistance to low-income families with children by replacing the existing entitlement program with fixed block grants to states to provide Temporary Assistance for Needy Families (TANF).[6] TANF provides about $16.5 billion annually to states to help families become self-sufficient, imposes work requirements for adults, and limits the time individuals can receive federal assistance.

However, accessing entry-level jobs to meet TANF work requirements can be challenging for low-income individuals, many of whom do not own cars or have poorly maintained cars that are not equipped to drive long distances. As we reported in 2004, many rural TANF recipients cannot afford to own and operate a reliable vehicle and public transportation to and from employment-related services and work is often not available.[7] Existing public transportation systems cannot always bridge the gap between the location of individuals' homes and jobs for which they qualify, not to mention child care and other domestic responsibilities and employment-related services. These systems were originally established to allow urban residents to travel within cities and bring suburban residents to central-city work locations. According to 2007 U.S. Census Bureau data, a higher proportion of people in metropolitan areas who are below the poverty level live in cities in those areas than in the corresponding suburbs.[8] Furthermore, employees at many entry-level jobs must work shifts in the evenings or on weekends, when public transit services are either unavailable or limited.

As a result, Congress created the JARC program in the Transportation Equity Act for the 21st Century (TEA-21) to support the nation's welfare-reform goals. The purpose of the program was to improve the mobility of low-income individuals by awarding grants that states and localities could use to provide additional or expanded transportation services and thus provide more opportunities for individuals to get to work. JARC funds

[6] TANF is a federal block grant to states that provides cash and noncash assistance to low-income families, such as employment services and training, work and other supports, and aid for persons at-risk.

[7] GAO, *Welfare Reform: Rural TANF Programs Have Developed Many Strategies to Address Rural Challenges*, GAO-04-921 (Washington, D.C.: Sept. 10, 2004).

[8] U.S. Census Bureau, *Income, Earnings, and Poverty Data from the 2007 American Community Survey*, (Washington, D.C.: August 2008).

were awarded to grantees designated for project funding in the conference reports that accompanied appropriations acts.

TEA-21 also required GAO to review the JARC program every 6 months. In a series of reports from December 1998 to August 2004, GAO found, among other things, that JARC had increased coordination among transit and human service agencies, but that FTA was slow in evaluating the program.[9] These reports included recommendations to assist FTA in improving its evaluation process. In response to these recommendations, FTA developed specific objectives, performance criteria, goals, and performance measures for the JARC program, although GAO noted limitations in the performance measures and recognized that FTA planned to continue to develop more comprehensive and relevant performance measures.

SAFETEA-LU made several changes to the JARC program that affected recipients.[10] Most notably, SAFETEA-LU created a formula to distribute funds beginning with fiscal year 2006: SAFETEA-LU requires that 40 percent of JARC funds each year be apportioned among states for projects in small urbanized and rural areas—those with populations of 50,000 to 199,999 and less than 50,000, respectively. It also required that the remaining 60 percent be apportioned among large urbanized areas—those with populations of 200,000 or more.[11] As a result, rural and small urbanized areas were each apportioned a total of $27.3 million in fiscal year 2006, while large urbanized areas were apportioned a total of $82 million (see table 1). The change to a formula grant program significantly altered the allocation of JARC funds because some states and large

[9]GAO, *Welfare Reform: Implementing DOT's Access to Jobs Program*, GAO/RCED-99-36 (Washington, D.C.: Dec. 8, 1998); *Welfare Reform: Implementing DOT's Access to Jobs Program in Its First Year*, GAO/RCED-00-14 {Washington, D.C.: Nov. 26, 1999); *Welfare Reform: DOT Is Making Progress in Implementing the Job Access Program*, GAO-01-133 (Washington, D.C.: Dec. 4, 2000); *Welfare Reform: GAO's Recent and Ongoing Work on DOT's Access to Jobs Program*, GAO-01-996R (Washington, D.C.: Aug. 17, 2001); *Welfare Reform: Competitive Grant Selection Requirement for DOT's Job Access Program Was Not Followed*, GAO-02-213 (Washington, D.C.: Aug. 17, 2001); *Welfare Reform: Job Access Program Improves Local Service Coordination, but Evaluations Should Be Completed*, GAO-03-204 (Washington, D.C.: Dec. 6, 2002); and *DOT's Job Access and Reverse Commute Program: Briefing to Congressional Staff* (Washington, D.C.: June 2003).

[10]Section 3018 of Pub. L. No. 109-59.

[11]The SAFETEA-LU formula apportions JARC funds on the basis of "eligible" low-income individuals in an area. SAFETEA-LU defined eligible low-income individuals as those whose family income is at or below 150 percent of the poverty line.

urbanized areas that did not formerly receive funds now receive them, and others receive different amounts than they received in the past. For example, total funds available in Florida and Virginia increased by more than 1,200 percent from fiscal years 2005 to 2006 (from $594,708 to $8.3 million and from $84,249 to $2.5 million, respectively). Similarly, the funds available for the large urbanized area of Tampa/St. Petersburg increased 64 percent from 2005 to 2006 (from $594,708 to $978,029). However, the total funds available to Alaska and Vermont decreased by more than 80 percent (from $1.7 million to $207,503 and from $991,182 to $186,885, respectively), and the funds available to the Birmingham, Alabama, area decreased 88 percent from 2005 to 2006 (from $3 million to $356,107). In addition, 18 states were apportioned JARC funds for fiscal year 2006 that did not receive funds in fiscal year 2005.

Table 1: JARC Apportionments, Fiscal Years 2006–2009

(Dollars in millions)

Type of area	2006	2007	2008	2009	Total
Rural	$27.3	$28.8	$31.2	$36.6	**$123.9**
Small urbanized	27.3	28.8	31.2	36.6	**123.9**
Large urbanized	82.0	86.4	93.6	109.9	**371.9**
Total	**$136.6**	**$144.0**	**$156.0**	**$183.1**	**$619.7**

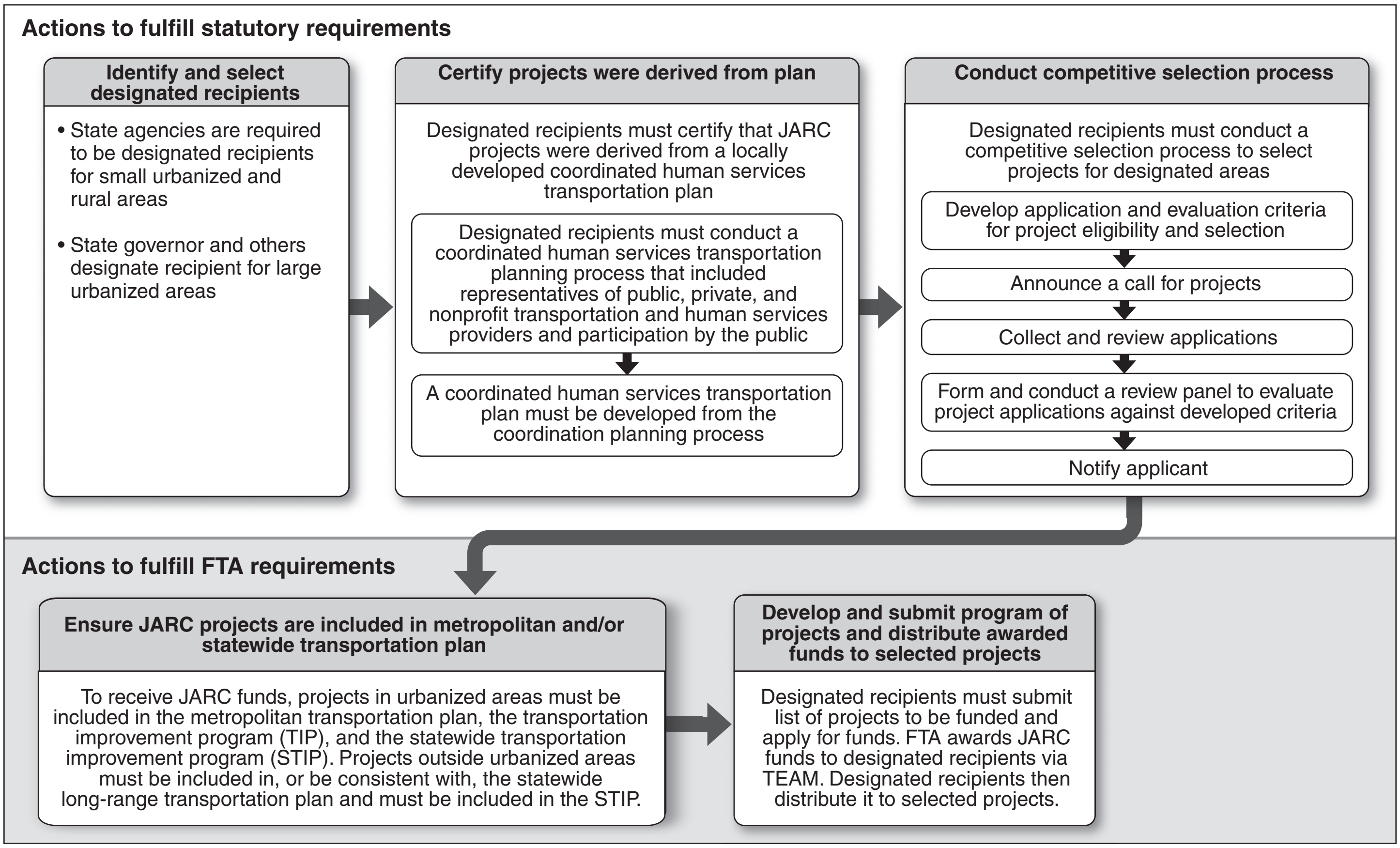
Source: GAO analysis of FTA data.

Recipients have up to 3 years in which to apply for funds for each fiscal year. For example, recipients could apply for fiscal year 2006 funds until September 30, 2008. Any funds not applied for by then lapsed and would have been reapportioned among all recipients for fiscal year 2009. Similarly, fiscal year 2007 funds are available until September 30, 2009 and fiscal year 2008 funds will be available until September 30, 2010.

The amount of available JARC funds is relatively small compared to FTA's primary grant programs. For example, FTA's Urbanized Area Formula Grant program (Section 5307), which provides transit funding for large and small urbanized areas, was apportioned $3.9 billion for fiscal year 2008, while FTA's Rural Area Formula Grant program (Section 5311) was apportioned about $416 million in fiscal year 2008. In contrast, the total amount of JARC funds available for the 3 fiscal years 2006 through 2008 is $436.6 million.

SAFETEA-LU also requires JARC recipients to fulfill specific requirements and follow specific processes (see fig. 1):

Figure 1: JARC Requirements and Processes under SAFETEA-LU



Source: GAO.

- SAFETEA-LU required that a recipient be designated to award JARC funds. This recipient is responsible for distributing funds to other agencies. The governor of each state designated a recipient—almost always the state department of transportation—for JARC funds at the state level for small urbanized and rural areas. For large urbanized areas, the governor, local officials, and public transportation operators selected designated recipients, often a major transit agency or metropolitan planning organization (MPO).
- SAFETEA-LU required that designated recipients certify that JARC projects are derived from locally developed coordinated public transit-human services transportation plans. The coordinated planning process must include representatives of public, private, and nonprofit transportation and human services providers and participation by the general public. In general, among the states we

contacted, either the designated recipient or MPO has taken the lead in developing coordinated plans in large urbanized areas. For small urbanized and rural areas, some designated recipients at the state level have generally delegated responsibility to develop plans to agencies at the local level, while in others the designated recipients have taken the lead. Local officials must ensure that appropriate transportation and human services providers participate in the process.[12]

- Under SAFETEA-LU, designated recipients at the state level must develop a solicitation process for small urbanized and rural areas to apply for funds. States must use a competitive selection process to select projects for these areas. Large urbanized areas must also develop and conduct a competitive selection process for their projects. After projects are selected, states and large urbanized areas must apply to FTA to fund the projects and certify that selected projects were derived from a locally developed, coordinated public transit-human services transportation plan.
- SAFETEA-LU allows states and large urbanized areas to use 10 percent of JARC funds for administrative activities, including planning and coordination activities. Under TEA-21, the use of JARC funds for planning and coordination activities was prohibited.
- To ensure designated recipients fulfill their stewardship roles, FTA requires designated recipients to submit a management plan describing how they plan to administer the JARC program. Designated recipients for large urbanized areas submit program management plans, while state agencies that are designated recipients for small urbanized and rural areas submit state management plans. States have submitted management plans in the past for other transit programs.[13] FTA allows states to amend existing management plans to include the JARC program.
- SAFETEA-LU increased the federal government's share of capital costs to no more than 80 percent. Under TEA-21, the federal match for capital projects was 50 percent, which was inconsistent with the federal share for capital projects in other FTA programs. As under TEA-21, JARC recipients must identify and raise 50 percent of the

[12]TEA-21 required that JARC projects be part of a coordinated public transit-human services transportation planning process but did not require certification that projects were derived from the plan.

[13]These include the Section 5310 Public Transportation for Elderly Individuals and Individuals with Disabilities program and the Section 5311 Nonurbanized program.

funds for operating projects. Matching funds may come from other federal programs that are not administered by DOT, such as TANF block grants, as well as from non-cash sources, such as in-kind contributions, employer contributions, and volunteer services.

SAFETEA-LU also requires that two other FTA programs that provide funding for transportation-disadvantaged populations[14] certify that projects be derived from a locally developed coordinated human services transportation plan. One of these, the New Freedom program, was created by SAFETEA-LU[15] to support new public transportation services and public transportation alternatives beyond those required by the Americans with Disabilities Act. According to FTA, the program is intended to fill gaps between human service and public transportation services and to facilitate integrating individuals with disabilities into the workforce as well as full participation in the community. The program provides alternatives to assist individuals with disabilities with transportation, including transportation to and from jobs and employment support services. The second program, the Elderly Individuals and Individuals with Disabilities program (commonly referred to as the Section 5310 program), has existed since 1975. The Section 5310 program originally provided formula funding for capital projects to help meet the transportation needs of elderly individuals and persons with disabilities.[16] However, in 1991, Congress expanded the Section 5310 program to allow funds to be used to acquire services to promote the use of private-sector providers and to coordinate with other human service agencies and public transit providers. These purchases are also considered to be capital expenses.

As indicated in tables 2 and 3, Congress apportioned $283.3 million and $408 million for the New Freedom and the Section 5310 programs,

[14]"Transportation disadvantaged populations" refers to populations that lack the ability to provide their own transportation or have difficulty accessing whatever conventional public transportation may be available.

[15]Section 3019 of Pub. L. No. 109-59; 49 U.S.C., Section 5317. Specifically, the (DOT) Secretary may make grants under this section to a recipient for new public transportation services and public transportation alternatives beyond those required by the Americans with Disabilities Act of 1990 (42 U.S.C. §§ 12101 et seq.) that assist individuals with disabilities with transportation, including transportation to and from jobs and employment support services.

[16]49 U.S.C. § 5310. Specifically, the (DOT) Secretary may make grants to states and local governmental authorities under this section for public transportation capital projects planned, designed, and carried out to meet the special needs of elderly individuals and individuals with disabilities.

respectively, from fiscal years 2006 through 2009. Similar to the JARC program, the New Freedom and Section 5310 programs are relatively small in comparison with FTA's regular transit formula programs. Recipients apply separately for funds for each of these programs.

Table 2: New Freedom Program Apportionments, Fiscal Years 2006–2009

(Dollars in millions)

Type of area	2006	2007	2008	2009	Total
Rural	$15.4	$16.2	$17.5	$20.2	**$69.3**
Small urbanized	15.4	16.2	17.5	20.2	**69.3**
Large urbanized	46.3	48.6	52.5	60.5	**207.9**
Total	**$77.2**	**$81**	**$87.5**	**$100.9**	**$346.5**

Source: GAO analysis of FTA data.

Note: Totals differ due to rounding.

Table 3: Section 5310: Elderly Individuals and Individuals with Disabilities Program Apportionments, Fiscal Years 2006–2009

(Dollars in millions)

Fiscal year	2006	2007	2008	2009	Total
Amount	$110.3	$116.7	$126.7	$135.8	**$489.5**

Source: GAO analysis of FTA data.

In our last evaluation of FTA's progress—our first report under SAFETEA-LU, issued in November 2006—we noted that, in response to our previous concerns over performance evaluation, FTA was taking steps to further improve its evaluation process, such as revising the JARC performance measures. We also noted that FTA was developing its strategies to evaluate and oversee the program and had not yet issued final guidance to implement JARC, and states were still working to meet the new requirements.[17] At that time, 3 states and 9 out of 152 large urbanized areas had received fiscal year 2006 funds as of the end of that fiscal year; these funds represented less than 4 percent of the fiscal year 2006 JARC funds apportioned to states and large urbanized areas. In our report, we recommended that FTA update its existing oversight processes to include the JARC program and specify how often it will monitor recipients that are

[17] GAO-07-43.

not subject to its existing oversight processes.[18] FTA agreed to consider our recommendations and has incorporated oversight provisions for the JARC program into its review processes. FTA also issued final guidance implementing the changes to JARC in May 2007.[19] As part of that guidance, FTA established policies and procedures for agencies to implement the program and established two performance measures to evaluate the performance of JARC projects: number of rides and number of jobs accessed.

FTA Is Making Progress in Awarding JARC Funds, and Recipients Are Using the Funds Primarily for Operating Services

FTA has awarded 48 percent (about $198.0 million) of JARC funds for fiscal years 2006 through 2008 to 49 states and 131 of 152 large urbanized areas. However, about 14 percent of fiscal year 2006 funds lapsed—primarily in small urbanized areas—for various reasons, including delays in fulfilling administrative requirements under SAFETEA-LU. According to FTA data, recipients plan to use the funds awarded thus far primarily to operate transit services as opposed to capital and other projects.

FTA Is Making Progress in Awarding Fiscal Year 2006 through 2008 Funds, Although Some Fiscal Year 2006 Funds Lapsed

Overall, FTA has awarded almost half of the apportioned $436.6 million available for fiscal years 2006 through 2008 (about 48 percent) to 49 states and 131 of 152 large urbanized areas, as of March 2009. This level represents significant improvement since GAO's last evaluation of FTA's progress in 2006, when 3 states and 9 large urbanized areas had received fiscal year 2006 funds. As shown in figure 2, FTA has awarded about $118 million (around 86 percent) of fiscal year 2006 JARC funds, approximately $56.7 million (around 39 percent) of fiscal year 2007, and around $23.2 million (about 15 percent) of fiscal year 2008. The majority of the fiscal year 2006 JARC funds (about 64 percent) were awarded in fiscal year 2008 before the September 30, 2008, deadline. Recipients we spoke with who did not apply for these funds until fiscal year 2008 said they delayed applying partly because of FTA's delay in issuing guidance and other challenges discussed later in the report.

[18] GAO-07-43.

[19] FTA, *The Job Access and Reverse Commute (JARC) Program Guidance and Application Instructions*, FTA C 9050.1 (Washington, D.C.: May 1, 2007).

Figure 2: Apportioned JARC Amount Awarded by Fiscal Years 2006 through 2008 (as of March 2009)

Fiscal year	Apportioned amount[a] (dollars in millions)		Awarded amount (Percentage of apportioned amount)[b]
2006	$136.6	2006	$5.3 (3.9%)
		2007	$22.7 (16.6%)
		2008	$87.4 (64.0%)
		Total	**$118.0 (86.4%)**
2007	144.0	2007	$7.2 (5.0%)
		2008	$47.6 (33.1%)
		2009	$3.5 (2.4%)
		Total	**$60.2 (41.8%)**
2008	156.0	2008	$22.4 (14.3%)
		2009	$6.0 (3.8%)
		Total	**$29.2 (18.7%)**
2009[c]	183.1	2009	$0.4 (0.2%)
		Total	**$0.4 (0.2%)**
Total (2006-2008)	**$436.6**	**Total**	**$207.4 (47.5%)**

0 50 100 150 200 250
Millions of dollars

Source: GAO analysis of FTA data.

[a]Apportioned amount is available to recipients during the fiscal year of apportionment plus 2 additional years. Apportioned fiscal year 2006 funds were available until September 30, 2008, while fiscal year 2007 and 2008 funds will be available until September 30, 2009, and September 30, 2010, respectively.

[b]States are allowed to transfer JARC funds to Section 5307 rural formula grant program and/or Section 5311. As of March 2009, about $2.6 million of fiscal year 2006, $1.9 million of fiscal year 2007, and $0.9 million of fiscal year 2008 were transferred to the Section 5307 and/or Section 5311 programs. The amount of transferred funds are included in the total awarded amount each year and the total awards for fiscal years 2006 to 2008. However, the percentage of funds awarded does not include the total with the transferred amount.

[c]Although the total amount apportioned for fiscal years 2006 through 2009 is $619.7 million, the apportioned amount for fiscal year 2009 is not included in the analysis.

However, about $18.6 million (roughly 14 percent) of fiscal year 2006 funds lapsed and will be reapportioned to all recipients with the fiscal year 2009 JARC funds apportionments.[20] While the largest amount of funds that lapsed were for large urbanized areas (about $10.9 million, or about 13

[20]States and large urbanized areas had to apply for fiscal year 2006 JARC funds, and have FTA obligate the funds by September 30, 2008. Otherwise, the funds lapsed and were no longer available for designated recipients' use.

percent of the amount allocated for those areas), a greater proportion lapsed in small urbanized areas (about $5.2 million, or 19 percent of the amount allocated for those areas). Thirty-three out of 152 large urbanized areas (about 22 percent) allowed a portion of the fiscal year 2006 JARC funds to lapse. While 5 out of the 33 large urbanized areas allowed less than 1 percent of their allocated funds to lapse,[21] about 64 percent of those recipients allowed all of the allocated funds to lapse. For instance, Miami, Florida, allowed all of its appropriated JARC funding—almost $2.8 million—to lapse. For small urbanized areas, 11 states and one U.S. territory had about $5.2 million funds lapse, with 6 states and U.S. territories having the entire allocated funds lapse.[22] Finally, for rural areas, five states and one U.S. territory had about 9 percent (about $2.5 million) lapse.[23] (See app. II for a complete list of areas that allowed fiscal year 2006 funds to lapse.)

According to FTA officials, fiscal year 2006 JARC funds lapsed for various reasons. Some areas encountered delays in developing the coordinated public transit human service transportation plan, and did not complete the plans in time to apply to FTA for fiscal year 2006 funds. (The next section of the report discusses these challenges in more detail.)

Despite the lapse of fiscal year 2006 funds, FTA is making progress to award the funds remaining for fiscal years 2007 and 2008 before the deadlines at the end of fiscal years 2009 and 2010, respectively. According to FTA, regional and headquarters staff have contacted stakeholders in areas where funds lapsed to explore ways for these communities to use the remaining funds. For example, in March 2009, FTA headquarters and Region 4 staff in Atlanta, Georgia., conducted a conference call with Miami transit providers and MPOs to discuss strategies for the large urbanized area to use its remaining JARC funds. During the call participants agreed

[21]The five large urbanized areas that awarded about 99 percent of their allocated fiscal year 2006 funds are: Dayton, Ohio; Madison, Wisconsin; New York, New York - Newark, New Jersey - Connecticut; Portland, Oregon - Washington; and Reno, Nevada.

[22]The 11 states that allowed fiscal year 2006 funds to lapse in small urbanized areas are California, Delaware, Hawaii, Indiana, Louisiana, Mississippi, Nevada, New York, North Carolina, Utah, and Wyoming. The five states that allowed their entire funds to lapse are Delaware, Hawaii, Mississippi, Nevada, and Wyoming. In addition, the territory of Puerto Rico allowed its entire fiscal year 2006 funds to lapse.

[23]The four states that allowed fiscal year 2006 funds to lapse in rural areas are California, Delaware, Indiana, and North Carolina. In addition, the territory of Puerto Rico allowed funds to lapse in rural areas.

to select a designated recipient, finalize coordinated plans, and conduct a competitive selection in time to apply for the area's fiscal year 2007 JARC funds. As of May 2009, the Governor of Florida has selected a designated recipient and the competitive selection process for JARC projects within the Miami area is underway.

As a result of such efforts, FTA has awarded more fiscal year 2007 and 2008 JARC funds, relative to the rate at which it awarded fiscal year 2006 funds. For example, FTA awarded about 3.9 percent of fiscal year 2006 funds in the first year of availability, compared with approximately 5.0 percent and 14.3 percent awarded in the first year of available fiscal years 2007 and 2008 funds, respectively. FTA officials and designated recipients we interviewed attributed the increase in the rate of awarding funds to various factors, including availability of and improvements to the final guidance, overcoming the initial learning curve in implementing the program, and awarding projects on a 2-year funding cycle. FTA expects to award more than 90 percent of fiscal year 2007 funds—slightly more than the 86 percent for fiscal year 2006—before the September 30, 2009, deadline.

Recipients Plan to Use Awarded Funds Primarily to Operate Existing Transit Services

Recipients have used or plan to use JARC funds primarily to operate or expand existing transit routes in an effort to target low-income populations. Recipients have the discretion to use JARC funds for three types of expenditures: (1) operating assistance to subsidize the cost of operating new or existing transit services, such as staffing, advertising costs, insurance and fuel; (2) capital assistance, such as purchasing vehicles and equipment; and (3) administrative costs. Designated recipients can use up to 10 percent of allocated JARC funds for administrative costs, such as the cost to conduct coordinated planning and competitive selection processes, but have discretion on how to use the remaining allocated amount—whether for operating assistance or capital projects. As shown in figure 3, recipients have used or plan to use about 65.3 percent of fiscal year 2006 funds primarily for operating assistance, compared to about 27.5 percent for capital expenses and 7.2 percent for administrative costs.

Figure 3: Types of Projects Funded for Fiscal Years 2006 through 2008 (as of March 2009)

Fiscal year	Apportioned amount[a] (dollars in millions)		Awarded amount (Percentage of total awarded amount for each fiscal year)[b]
2006	$136.6	Operating assistance	$75.4 (65.3%)
		Capital expense	$31.7 (27.5%)
		Administration and planning	$8.3 (7.2%)
		Total	**$118.0**
2007	144.0	Operating assistance	$40.0 (68.6%)
		Capital expense	$14.4 (24.7%)
		Administration and planning	$3.9 (6.7%)
		Total	**$60.2**
2008	156.0	Operating assistance	$23.8 (84.0%)
		Capital expense	$3.2 (11.3%)
		Administration and planning	$1.3 (4.7%)
		Total	**$29.2**
2009[c]	183.1	Operating assistance	$0.09 (69.7%)
		Capital expense	$0.3 (22.2%)
		Administration and planning	$0.03 (8.1%)
		Total	**$0.4**
Total (2006-2008)	**$436.6**	**Total**	**$207.4**

Millions of dollars (0, 50, 100, 150, 200, 250)

Source: GAO analysis of FTA data.

[a]Apportioned amount is available to recipients during the fiscal year of apportionment plus two additional years. Apportioned fiscal year 2006 funds were available until September 30, 2008, while fiscal year 2007 and 2008 funds will be available until September 30, 2009, and September 30, 2010, respectively.

[b]States are allowed to transfer JARC funds to Section 5307 rural formula grant program and/or Section 5311. As of March 2009, about $2.6 million of fiscal year 2006, $1.9 million of fiscal year 2007, and $0.9 million of fiscal year 2008 were transferred to the Section 5307 and/ or Section 5311 programs. The amount of transferred funds are included in the total awarded amount each year and the total awards for fiscal years 2006 to 2008. However, the percentage of funds awarded does not include the total with the transferred amount.

[c]Although the total amount apportioned for fiscal years 2006 through 2009 is $619.7 million, the apportioned amount for fiscal year 2009 is not included in the analysis.

Many recipients we interviewed are using funds to help cover the cost to operate existing transit routes, or to expand transit services targeted at low-income populations. For example, the Rochester-Genesee Regional Transportation Authority, a designated recipient in a large urbanized area in upstate New York, plans to use JARC funds to operate an existing reverse commute, fixed route service[24] during evenings and on weekends from the city of Rochester to employment locations in outlying suburban areas. Similarly, New Jersey Transit awarded the North Jersey Transportation Planning Authority funds to offset operating costs for its demand response transit service[25] in Bergen County, New Jersey Recipients also plan to use funds to operate other types of transit projects eligible under JARC, such as bicycle loan or auto repair programs. For instance, the Southwestern Wisconsin Community Action Program is currently using JARC funds to operate an auto loan program to assist low-income workers in rural areas in purchasing vehicles for shared rides to work, while the Kenosha Achievement Center in the Kenosha, Wisconsin, small urbanized area is using JARC funds to operate a bike loan program that would provide transportation to jobs for low-income job seekers.

Fewer JARC recipients we interviewed plan to use the funds for capital assistance. Although JARC provides up to 80 percent of federal funds for recipients' capital assistance and 50 percent for operating assistance, recipients noted that the available funding is not generally sufficient to start new services and/or purchase vehicles and equipment—both of which can be costly—and continue operating services after receiving JARC funds. For instance, representatives of a designated recipient in Georgia told us that they would like to establish and operate new bus routes to transport low income workers to a new employment center being developed. The designated recipient was allocated about $192,000 for fiscal year 2006, but officials indicated that this amount would only allow them to purchase one transit bus, which typically costs about $300,000 to purchase and $200,000 per year to operate. The funding would not cover additional buses or sustain operations beyond 1 year. The designated recipient may apply for fiscal year 2007 and 2008 funds but would still have difficulty continuing the routes under current budget constraints in the region.

[24]Reverse commute projects are public transportation projects designed to transport residents in urbanized and rural areas to employment locations in suburban areas. Fixed route service provides transportation along a designated route or station, such as a bus or train route. Customers must arrange travel from their home to a bus or train station, where they are transported to the station closest to their final destination. Customers then must arrange to travel from the station to their final destination.

[25]Demand response transit services provide transportation between specific locations at a customer's request. For example, customers can arrange to be picked up at home and dropped at their place of employment.

Nevertheless, other recipients we contacted do plan to use JARC funds for capital expenses, such as purchasing a van for a vanpool or a global positioning system to assist in operating a mobility management program. For instance, the Coastal Georgia Regional Development Center plans to use its fiscal years 2006 and 2007 JARC funds to operate 12 regional vanpools that will serve eight passengers per vehicle and provide two trips per day in the southern rural areas of Georgia, while the Lower Savannah Council of Governments plans to use some of its funds to defray the cost of operating a new mobility management program in its rural and small urbanized regions. A few designated recipients also indicated that they plan to use some of their JARC funds to implement such a program. Finally, many designated recipients chose not to use the funds for administrative purposes because they wanted to use the funds for transportation rather than support services.

JARC Recipients Report Multiple Challenges in Implementing the Program

Recipients and local authorities we interviewed cited multiple challenges throughout the process for implementing JARC-funded projects. Although many of these recipients and local authorities have addressed these challenges and have received JARC funding, a common concern we heard is that, overall, the amount of effort required to obtain JARC funds is disproportionate to the relatively small amount of funding available compared to other transit programs. FTA officials are taking steps to address these challenges, and noted that some challenges—such as the amount of funding and flexibility in using JARC funds—are rooted in statute and would need to be addressed by Congress in the next surface transportation reauthorization.

Initial Delay in Issuing Final Guidance Hindered Implementation

Although many designated recipients we interviewed commented that FTA has made progress in implementing JARC, some noted that issues with FTA's guidance hindered implementation. First, FTA did not issue its final guidance until May 2007, almost 2 years after SAFETEA-LU was enacted in August 2005 and 2 months after FTA initially planned to issue it. As we previously reported,[26] FTA used an extensive public participation process to develop the guidance and received a large volume of public input, partially in response to requests from transit agencies and stakeholders.[27]

[26] GAO-07-43.

[27] FTA also decided to publish the JARC circular at the same time it published circulars for the New Freedom and Section 5310 programs because the circulars contained significant cross-cutting guidance.

While this process helped FTA develop the final guidance, it also delayed its issuance. Consequently, FTA's interim guidance included a "hold harmless" provision stating that the final guidance requirements would not apply retroactively to grants awarded before FTA issued the final guidance. Some designated recipients chose to implement JARC programs using FTA's interim guidance. Others, however, were hesitant to do so because of uncertainties in interpreting policies and procedures and chose to wait for the final guidance. This ultimately reduced the time available for these recipients to apply for JARC funds appropriated in fiscal year 2006.

Second, some JARC recipients found FTA's interim and final guidance vague and overly broad. Designated recipients noted that the guidance did not provide sufficient specific information on whether a project was eligible for JARC funds or the standards of oversight for subrecipients.[28] Specifically, designated recipients in Arizona, California, and Pennsylvania commented that FTA's guidance does not provide enough information on overseeing and managing subrecipents. For example, one recipient was unsure of the parameters for funding and monitoring JARC auto loan projects.[29] Recipients were also unsure how to oversee and manage projects that cross boundaries throughout the region, such as large and small urbanized and rural areas. For example, a recipient and subrecipient in Arizona were unsure about how to develop a cost-allocation method for demand response and fixed route projects that operate across large and small urbanized and rural boundaries. An FTA official stated that the guidance was intended to provide a broad framework for implementation and allow states and large urbanized areas flexibility to administer programs that best meet local and regional needs without being overly prescriptive. FTA also noted that the final JARC circular includes examples and detailed lists to supplement the guidance.

[28]Subrecipients must include JARC projects in a locally developed coordinated human services transportation plan, as well as apply and be selected through a designated recipient's competitive selection process to receive JARC funds.

[29]This recipient was uncertain as to how it can fund and monitor loans for automobiles that should be used specifically for travel to employment locations. Individuals who receive a loan with JARC funds and purchase automobiles can use the vehicle for purposes other than access to jobs, such as shopping and visiting friends. FTA noted that it has since developed more detailed guidance on funding and monitoring auto-loan projects and is working to make it available to grant recipients and other interested parties.

In addition, some designated recipients and an industry association representative commented that FTA provided inconsistent information. For instance, one FTA regional office required all designated recipients in its jurisdiction to submit locally developed, coordinated public transit-human services transportation plans to verify that project applications for JARC funds were derived from the plans. However, this practice was not consistent with other FTA regions. FTA subsequently directed regional offices to instead rely on JARC applicants' certification that projects were derived from the plans. They also directed regional offices to confirm that the individual applicants and projects submitted are included in the program of projects required to receive JARC funds. An FTA official acknowledged inconsistent information and interpretation of its guidance among some regional offices and stated that FTA has been using a document entitled "Questions and Answers on the Section 5310, JARC, and New Freedom Programs" posted on its Web site to reduce inconsistencies among regional offices. An FTA official also noted that the agency has periodically taken advantage of its regularly scheduled bi-weekly meetings between headquarters and regional staff to clarify JARC program guidance and to provide additional guidance to regional staff.

Delays in Identifying Designated Recipients in Some Large Urbanized Areas Contributed to Delays in Awarding Funds

Some recipients commented that delays in identifying designated recipients in large urbanized areas contributed to delays in awarding fiscal year 2006 funds and implementing transit projects. Some states and large urbanized areas did not identify designated recipients until fiscal year 2008. Moreover, although the majority of designated recipients have been identified, as of September 2009, 5 out of 152 large urbanized areas had not yet identified a designated recipient; these 5 areas allowed fiscal year 2006 funds to lapse. This may be because prospective designated recipients are reluctant to take on the role. Officials with the New York Metropolitan Transportation Authority reported that they did not want to be the designated recipient primarily because they were not sure they could fulfill the requirements with the limited amount of funds available to administer and manage the program. Specifically, SAFETEA-LU allows non-profit agencies to receive JARC funding and FTA requires that designated recipients ensure that subrecipients, which could include non-profit agencies, comply with federal requirements. Some non-profit agencies have not received FTA funds in the past and local officials were not confident these agencies had the financial capability to manage JARC funds and comply with FTA's requirements. These agency officials expressed concern that they would be held liable if non-profit agencies ultimately did not comply with those requirements. In particular, many New York City transit agencies had these concerns and, as a result, the

New York State DOT agreed to become the designated recipient for the New York City portion of the New York-Newark large urbanized area.

Concerns about taking on the designated recipient role were not limited to areas without designated recipients. For instance, the Port Authority of Allegheny County, the major transit agency in the Pittsburgh large urbanized area, plans to transfer the designated recipient role to the area's MPO—the Southwestern Pennsylvania Commission—because the administrative requirements exceeded its capacity and regional jurisdiction.[30] Additionally, 8 states—4 of which we contacted—took on the role of designated recipient for 16 large urbanized areas. According to officials in New York and Wisconsin, the state departments of transportation took on the responsibility primarily because they did not want funds to lapse and local authorities did not want to take on the responsibilities, respectively. For instance, officials with the MPOs in Madison and Milwaukee told us they asked the Wisconsin DOT to be the designated recipient for those large urbanized areas because the state had experience with administering the program under TEA-21 and the MPOs had insufficient resources to take on the responsibilities.

Because the process of identifying designated recipients in some areas took more than 2 years after SAFETEA-LU was enacted, it reduced the time available for those areas to conduct a coordinated planning process, develop a coordinated human services transportation plan, conduct a competitive selection process, and apply to FTA for funds before the September 30, 2008, deadline to award fiscal year 2006 funds. Designated recipients that were not identified until fiscal year 2008 were at a particular disadvantage because they had less time to apply for JARC funds. Designated recipients in large urbanized areas in California and Georgia and a subrecipient in Chicago all commented that the process for identifying and selecting designated recipients ultimately delayed applications to FTA for fiscal year 2006 funds and hindered implementing projects.

[30] The Port Authority of Allegheny County will retain the designated recipient role until Pennsylvania's governor notifies FTA to re-designate the role to the MPO.

Multiple Designated Recipients in Some Areas Led to Additional Steps to Administer Funds and Limited Funding Flexibility

Some recipients indicated that assigning multiple designated recipients to administer and manage JARC funds has resulted in additional steps to administer JARC. Under SAFETEA-LU, state agencies must be the designated recipients for small urbanized and rural areas, while local agencies, such as a major transit agency or MPO, can serve as designated recipients in large urbanized areas. However, the jurisdiction of some local agencies that were selected as designated recipients in large urbanized areas may include small urbanized and rural areas. Specifically, officials in Sacramento, Los Angeles, and San Francisco/Oakland in California, and Phoenix, Arizona, indicated that this infrastructure is disjointed and confusing because states are responsible for rural and small urbanized areas that may also be under the jurisdiction of designated recipients for other FTA programs in large urbanized areas.

For example, the Sacramento Area Council of Governments—the MPO and designated recipient for Sacramento—has jurisdiction over the large urbanized area as well as the small urbanized and rural areas[31] in the region for the federally required Transportation Improvement Program.[32] Subrecipients that provide transit services for the large urbanized area as well as rural areas need to apply to both the state and the designated recipient in a large urbanized area to receive funds for the urbanized and rural areas as well as report to both the MPO and state.

To facilitate coordination and share resources, some states, such as Arizona and California, have delegated the administration of JARC projects in small urbanized areas to designated recipients in large urbanized areas, while retaining jurisdiction over rural areas. For instance, California delegated the responsibility for conducting a competitive selection process to the Metropolitan Transportation Commission in the San Francisco-Oakland area and the Sacramento Area Council of

[31]As previously mentioned, SAFETEA-LU's JARC formula apportions and distributes funds among three geographic areas—large urbanized, small urbanized, and rural areas—based on the size of the population and the number of eligible low-income individuals and welfare recipients in the geographic area.

[32]The Transportation Improvement Program lists specific projects that will be implemented over the next 4 years. MPOs receive federal planning funds from FTA to develop the list of surface transportation projects that receive federal funds, are subject to a federally required action, or are regionally significant. The Sacramento Area Council of Governments, as the federally designated MPO for the six-county Sacramento Region, prepares and adopts the Metropolitan Transportation Improvement Plan about every 2 years.

Governments in Sacramento for small urbanized areas under those agencies' jurisdiction.

While delegating administration of JARC projects in small urbanized areas to designated recipients in large urbanized areas may facilitate coordination, it also results in additional work for designated recipients for both the state and large urbanized areas. As the designated recipient for small urbanized areas, the state is ultimately responsible for all aspects of funding distribution and oversight of subrecipients in those areas. Thus, it must ensure and certify that the statewide competitive selection process resulted in a fair and equitable distribution of funds. Consequently, states may want to review and assess projects for small urbanized areas that were selected as part of the large urbanized area's competitive selection process to ensure that they were derived from the locally developed, coordinated public transit-human services transportation plan. Some states may want designated recipients for large urbanized areas to apply for small urbanized area funds through the state's designated recipient, rather than directly to FTA. For instance, a designated recipient for a large urbanized area in California that was delegated responsibility to oversee the competitive selection process for small urbanized areas instructed the agency to send its selected JARC projects to the state for additional review and competition with other small urbanized areas in the state. The state then applied to FTA for funding. This process increased the time and effort to award funds for small urbanized areas. As previously mentioned, a greater proportion of funds lapsed in small urbanized areas, compared to funds allocated to large urbanized and rural areas. Some designated recipients suggested allowing states discretion to select designated recipients for small urbanized and rural areas, rather than requiring the state to take on that role. However, SAFETEA-LU requires that the state be the designated recipient for small urbanized and rural areas.

Moreover, although SAFETEA-LU's formula allocating funds by large and small urbanized and rural area classifications provides funds to areas that had not previously received JARC funds, some designated recipients indicated that the funding allocations between urban and rural areas limited them from distributing funds where they are most needed. Some recipients we contacted would like discretion to use funds where they are most needed in the state and the region. Currently, large urbanized areas receive more funding than small urbanized and rural areas, since the funding formula is based on the population and number of eligible low-income residents. In some cases this may meet needs, but officials from New Jersey Transit commented that transportation needs of New Jersey's small urbanized and rural areas have been disproportionately affected by the formula, making it difficult to meet the transit needs of small urbanized and rural areas because allocated funds cannot be transferred from large urbanized areas. Additionally, officials from the Oregon Department of Transportation[33] indicated that the state could not transfer funds from its small urbanized areas to its rural areas, even if the state received more applications from rural areas than from small urbanized areas. In another case, officials from the Metropolitan Transportation Commission indicated that they had difficulties awarding JARC funds to potential recipients in Petaluma, California—a relatively wealthy, small urbanized area in northern California—because the area did not have a large concentration of low-income residents and did not qualify for the funds that were allocated to the area. As mentioned earlier, California was one of the states in which funds lapsed for small urbanized and rural areas. Designated recipients in California, New Jersey, and Wisconsin suggested eliminating the urbanized area classifications established in SAFETEA-LU and giving local agencies discretion to allocate funds where they are most needed in the region. According to officials, this would give designated recipients flexibility to transfer funds to areas that may need more funds, such as rural areas with fewer resources than large urbanized areas.

Furthermore, designated recipients in large urbanized areas that cross state lines—such as New York City, New York and Newark, New Jersey—had to take additional steps to administer the program. Industry associations noted concerns about how large urbanized areas that crossed state lines would implement changes to JARC. Although the designated recipients in multi-state jurisdictions we interviewed indicated that awarding JARC funds was not as much of an issue as expected, the process did require additional administrative and coordination efforts. For instance, in several multi-state large urbanized areas—like Chicago, Illinois - Northwestern Indiana; Augusta, Georgia -Aiken, South Carolina; and New York City, New York - Newark, New Jersey—the cities in one of the states decided not to apply for or use all of the allocated JARC funding. Specifically, officials in northwestern Indiana, Augusta, and New York City decided not to apply for or use all of the allocated JARC funding. Each of these cities transferred JARC funding to the city in the other state to ensure that the funds would be used. For example, the New York City

[33]Although Oregon was not one of the states selected in our non-probability sample, we spoke with officials from the Oregon Department of Transportation and officials from other state DOTs, including Iowa, North Dakota, and Texas, during interviews with AASHTO.

Metropolitan Transportation Authority decided not to apply because it already provides extensive transit services 24 hours a day, 7 days a week and did not need the relatively small amount of JARC funds available. However, to accomplish this transfer, the designated recipients had to agree on how to split the apportionment and notify FTA annually of the split and the geographic area each recipient would manage. For example, when New York transferred some of the New York City portion of the JARC funds to New Jersey so that it could be used for a project in Newark, officials had to negotiate the formula to use to determine the amount of the funds to transfer to New Jersey for Newark's use. These negotiations took some time, which subsequently delayed New Jersey Transit's efforts to award JARC funds in the Philadelphia, Pennsylvania.-Camden, New Jersey area.[34] In another instance, northwestern Indiana was not able to use its JARC funding during the summer of 2008 and transferred the funds to Illinois for Chicago to use. Officials with Chicago's Regional Transportation Authority stated that they had to quickly identify projects to include in its application so that the funds would not lapse.

Although Recipients Considered Coordination Beneficial, Multiple Factors Make It Difficult

Many state and designated recipient officials we interviewed considered the coordinated planning process beneficial and worthwhile. Recipients noted that including stakeholders from transit and planning agencies as well as human services agencies provided different perspectives and resources and brought together agencies that traditionally do not work together. As a result, the coordination process helped identify transit service needs and gaps. One planning agency stated that the coordinated planning requirement helped build on efforts it previously had in place because it compelled agencies to work together to receive federal funds and forced them to plan more strategically.

However, designated recipients cited multiple factors that challenged coordination efforts:

Lack of sufficient funds, resources, and expertise

Many designated recipients noted that the limited amount of funds, lack of resources and, in some cases, lack of planning expertise, made coordination difficult:

[34]New Jersey Transit is the designated recipient for all of New Jersey.

- Some designated recipients that used the 10 percent of JARC funds SAFETEA-LU allows for administration and planning commented that the amount is insufficient to cover the cost of planning. For instance, a designated recipient in a large urbanized area in Georgia hired a consultant to conduct the coordinated planning process and develop a plan, but the allowance did not cover the cost of the consultant. In another case, Oregon can use about $59,800—the allowed amount for fiscal year 2006—for administrative purposes. However, officials noted that, in total, the state spent about $400,000 to develop coordinated plans for its 46 local and tribal agencies. Similarly, Arizona obtained a grant from the United We Ride initiative to help defray—but not entirely cover—the cost to develop a coordinated public transit-human services transportation plan for small urbanized and rural areas.[35] Although FTA allows designated recipients to also combine JARC funds with 10 percent of the funds from the New Freedom and the Elderly Individuals and Individuals with Disabilities (commonly referred to as Section 5310) programs,[36] some designated recipients decided not to use the funds for administrative activities because they wanted to use the relatively small amount of allocated funds for transportation services rather than support services.
- Six of the nine state-level designated recipients we spoke with indicated that rural areas, in particular, have fewer resources and thus find JARC's coordinated planning requirements more challenging than do large and small urbanized areas.[37] One state official stated that while some rural areas have used Section 5311

[35]United We Ride is a federal interagency initiative that supports states and localities in developing coordinated human service delivery systems. In addition to state coordination grants, United We Ride provides states and local agencies a transportation-coordination and planning self-assessment tool, technical assistances, and other resources to help coordinate transportation in local communities.

[36]The New Freedom and the Elderly Individuals and Individuals with Disabilities programs provide funding for transportation-disadvantaged populations. While the New Freedom program provides funding for new public transportation and public transportation alternatives that assist individuals with disabilities, the Elderly Individuals and Individuals with Disabilities program provides formula funding for capital projects to assist in meeting transportation needs of elderly and persons with disabilities.

[37]The coordinated planning effort varied from state to state, and while one state agency led the coordinated planning process for small urbanized and rural areas, other states delegated the responsibility for coordination and developing plans to local small urbanized and rural regions.

rural formula program[38] funds to pay for planning and coordination costs, others that do not receive other FTA funds have no funds available for planning and coordination. In other areas, state budget issues may limit how funds can be used. For instance, Georgia applied to use JARC funds for administrative purposes, but current state budget problems have prohibited funds from being used to hire additional staff to coordinate and develop plans for rural areas.

Rural areas in some states do not have a regional planning infrastructure or staff with planning expertise to conduct and develop coordinated public transit-human services transportation plans. For instance, Wisconsin officials indicated that their state does not have a regional rural planning infrastructure because the state develops rural area policies and derives projects from that process. An Illinois official commented that rural areas had never developed public transportation plans before SAFETEA-LU. The state hired planning coordinators to help develop coordinated plans in rural areas because those areas lacked staff with planning expertise. Nevertheless, recipients in other rural areas indicated that the planning process did not present challenges in rural areas, and coordinated planning in rural areas is critical because these areas are isolated and coordination is critical to providing transit services.

Despite these concerns, many recipients have developed coordinated public transit-human services transportation plans. These plans will need to be periodically updated. Recipients noted that challenges in coordinating and periodically updating plans will continue, particularly if stakeholders are asked to meet regularly but are not guaranteed to receive funds, given the limited amount of JARC funding available. Recipients indicated that the amount of effort required to coordinate and develop a plan, along with conducting a competitive selection process, is disproportionate to the small amount of JARC funds available.

Difficulties in engaging human services agencies

Another coordination challenge cited was convincing other organizations, such as human service agencies, to consistently participate in the planning process. While designated recipients encourage stakeholders from human services agencies to participate in the coordination effort, these agencies

[38]The Section 5311 rural formula program provides funding for public transportation in rural areas. FTA apportions funds for rural areas to the states according to a formula based on each state's rural population and land area.

are not necessarily required to coordinate. Some designated recipients have required these agencies to participate in the coordinated planning process in order to receive funds. However, according to a designated recipient, the relatively small amount of JARC funds does not offer sufficient incentive for some agencies to participate. Some designated recipients suggested that federal agencies, such as the Department of Health and Human Services, that provide and allow funds to be used for transportation services should require grantees to participate in coordinated planning efforts.

According to Department of Health and Human Services officials, federal officials are making efforts to increase participation by other organizations, but ultimately, local human services agencies decide whether or not to participate in the coordinated planning process. Officials with FTA and other federal agencies, including the Department of Health and Human Services and the Department of Labor, reported that they have been working through the Federal Interagency Coordinating Council on Access and Mobility to encourage federal grantees to participate in coordinated transportation planning efforts. In 2003, we recommended that federal agencies develop and distribute additional guidance to states and other grantees to encourage coordinated transportation by clearly defining allowable uses of funds, explaining how to develop cost-sharing arrangements for transporting common clientele, and clarifying whether funds can be used to serve individuals other than a program's target population.[39] While the respective federal agencies have since issued guidance[40] encouraging grant recipients to share resources with local transit and planning agencies through the Federal Interagency Coordinating Council on Access and Mobility, the agencies are still developing a cost sharing policy. However, officials from the departments of Labor and Health and Human Services indicated that local human services agencies may have other competing priorities that limit their ability to coordinate with transit agencies.

[39]GAO, *Transportation-Disadvantaged Populations: Some Coordination Efforts among Programs Providing Transportation Services, but Obstacles Persist*, GAO-03-697 (Washington, D.C.: June 30, 2003).

[40]Federal Interagency Coordinating Council on Access and Mobility, *Vehicle Resource Sharing Final Policy Statement* (Washington, D.C.: Oct. 1, 2006).

Difficulties integrating JARC planning requirements with existing planning requirements

Additionally, the different requirements between JARC's coordinated public transit-human services transportation plan and the state and metropolitan transportation plans can result in additional work for designated recipients. For instance, under SAFETEA-LU, states and MPOs are not required to include human services providers as stakeholders in the transportation planning process; states and MPOs are only required to provide stakeholders a reasonable opportunity to comment on the state and metropolitan transportation plans. JARC, on the other hand, requires designated recipients to include human services agencies in the planning process and have a role in developing the coordinated public transit-human services transportation plan. Some designated recipients indicated that integrating human services agency coordination for JARC into existing transportation planning process would help streamline efforts.

Some Recipients Indicated Challenge in Identifying and Raising Matching Funds

Designated recipients in four states and four large urbanized areas commented that identifying and generating matching funds has been challenging, particularly for small urbanized and rural areas. Although the state and local match for capital projects—20 percent—is less than the match for operating projects—50 percent—many recipients use JARC funds for operating projects and thus must identify and raise 50 percent of the cost of these projects. Some states, such as California and Pennsylvania, and large urbanized areas such as Chicago, have a dedicated source of funds, such as state or local sales taxes, to match federal transit programs, but other states, such as Georgia, and large urbanized areas—such as Milwaukee and Madison in Wisconsin and Savannah and Augusta in Georgia—do not.

Recipients in locations with dedicated sources of matching funds also noted that those sources are not always stable. For example, a designated recipient and subrecipient relying on sales tax revenues dedicated to transit noted decreased sales tax revenues due to the current economic slowdown. Moreover, dedicated sources of matching funds are not always sufficient to cover program costs. For instance, designated recipients in New York urbanized areas have a dedicated tax that can be used for capital expenditures but not for operating projects. In addition, two recipients noted that funds from other federal agencies, such as TANF funds, are increasingly being used for purposes other than transportation, reducing the amount available for use as matching funds for JARC projects.

Lack of Competition Raises Concern

Although some recipients we contacted indicated that the competitive process has been fair and transparent, regional FTA officials and a few designated recipients expressed concern over the lack of competitive JARC projects in some geographic areas. For instance, the designated recipient for the Phoenix large urbanized area noted that it received only one project application for the competitive selection process for fiscal years 2006 and 2007 funds.

Some designated recipients noted that competition does not exist in certain areas because some potential subrecipients, particularly nonprofit organizations, cannot meet federal requirements, limiting the number of candidates that can apply for JARC funds. Several designated recipients indicated that nonprofit organizations may not have the capacity to meet federal mandates, such as FTA's procurement requirements for purchasing vehicles, and/or manage FTA funded projects. Additionally, large transit agencies that had previously received JARC funds are in a better competitive position, which might discourage smaller transit agencies or nonprofit agencies from applying. For instance, Maricopa County's Special Transportation Services in Phoenix, Arizona, has experience applying for federal funds, as it has historically received JARC funding since 1999, and is in a good position to compete. The agency has the resources available, such as a fleet of shuttle vans that are already in compliance with federal regulations and requirements. On the other hand, according to the designated recipient, a nonprofit agency in Phoenix that was new to the JARC program withdrew its application for funds after determining that it could not comply with federal regulations and the administrative requirements for purchasing vehicles.

Some Recipients Reported That Requirements to Administer and Manage JARC Duplicate Other FTA Program Requirements

Several states and designated recipients in large urbanized areas noted that the requirements to manage and administer JARC duplicate those of FTA's two other relatively small transit programs, New Freedom and Section 5310. Although some designated recipients voiced concerns about consolidating the programs because they serve populations with different needs, others suggested streamlining or consolidating them because they have similar administrative requirements, such as coordinating with human services agencies and developing a coordinated plan. FTA allows designated recipients to streamline and consolidate planning efforts for all three programs. However, some recipients commented that applying for the funds separately for these programs is redundant and time consuming. For instance, a subrecipient in Arizona submitted two identical applications—one for JARC and one for New Freedom—to the designated recipient, which in turn submitted similar applications to FTA for both

JARC and New Freedom funds. Designated recipients noted that consolidating JARC with related FTA programs, such as the New Freedom and Section 5310 programs, would lessen the amount of administrative effort required to receive and manage the programs.

Transit industry associations have proposed consolidating JARC with other federal transit programs to streamline and eliminate the administrative burden of coordinating and managing various FTA transit programs. AASHTO proposed consolidating JARC with FTA's urbanized area and rural area formula grants programs[41] and combining the New Freedom program with Section 5310. The American Public Transportation Association proposed consolidating JARC with New Freedom and Section 5310. Both associations indicated that the intent of the proposals is to reduce the programs' administrative requirements while still maintaining the programs' intent to provide transportation services to disadvantaged populations. Nevertheless, associations representing elderly and disabled persons, such as the Easter Seals, AARP, and Association of Programs for Rural Independent Living expressed concern that consolidating these programs would jeopardize advances in providing transportation to these populations. Officials from all of the associations—those representing the transportation agencies as well as those representing elderly and disabled persons—agreed that any changes to the JARC, New Freedom, and Section 5310 programs need to ensure that the programs' intent remains intact.

JARC Program Recipients Cite Benefits, but FTA's Plans for Current Evaluations May Have Limitations

Although FTA has not completed an evaluation of the JARC program under SAFETEA-LU, recipients we spoke with indicated that projects have benefited low-income individuals by providing a means to get to work. FTA has improved its approach for evaluating the program since 2000 and currently has two studies under way to evaluate the JARC program under SAFETEA-LU. However, both studies—one on performance measures and another on the program's economic impacts—may have limitations that could affect FTA's assessment of the program.

[41] The urbanized formula program is commonly referred to as Section 5307; the rural formula program is commonly referred to as Section 5311.

Program Recipients Cite Positive Benefits

Although FTA's evaluations of the JARC program are not yet complete, many designated recipients and subrecipients believe that the program is beneficial because it has helped people access and maintain jobs. State and local officials that we interviewed cited numerous examples in which projects benefited individuals because they provided a means for them to get to work. Officials noted that, without the transportation that JARC services provided, these individuals would not have been able to obtain and maintain jobs. For example, officials in Milwaukee, Wisconsin, noted that JARC bus routes provided 96,000 rides during a 6-month period, suggesting that many people were using the routes to get to jobs or job training. Similarly, in New Jersey, surveys of individuals who use JARC services indicated that 70 percent of them could not get to work without the transportation services being provided. Despite these individual experiences, however, designated recipients and other state and local officials agreed that JARC projects funded under SAFETEA-LU have not been in effect long enough to determine the projects' impact. Any evaluation of the projects would also have to consider program costs, such as the time and effort designated recipients and others invest to implement the program and comply with its requirements.

Collecting Data for JARC Performance Measures Could Be Difficult

FTA has contracted with CES and TranSystems—which have been evaluating the JARC program since 2003—to further develop and improve the performance measures established in FTA's final JARC guidance in May 2007. The current performance measures include the number of rides on JARC-funded projects and the number of jobs accessed. Designated recipients[42] will report data on JARC projects to CES and TranSystems in May 2009. These data will likely include projects funded under SAFETEA-LU, as most of the projects implemented under SAFETEA-LU were awarded in fiscal year 2008. FTA officials anticipate a report in September 2009.[43]

[42]FTA requires designated recipients to report performance data. However, designated recipients can delegate this responsibility to subrecipients.

[43]FTA originally planned to request that designated recipients begin reporting in February 2009. However, FTA delayed reporting to allow agencies time to apply for projects under the American Recovery and Reinvestment Act (ARRA), (Pub. L. 111-5). Many designated recipients handle other transit programs and had a limited period of time in which to apply for ARRA funds. Although CES and TranSystems officials indicated that they have already collected data in some states, FTA officials indicated that these data were collected in conjunction with pretests of the contractors' data collection instrument.

However, limitations inherent in the performance measures could affect the usefulness of this evaluation:

- Actual or estimated number of rides (as measured by one-way trips): According to designated recipients and other state and local agency officials we spoke with, determining the number of rides to access jobs presents challenges because individuals use fixed route services for many reasons in addition to traveling to work, including shopping and medical appointments. For example, for projects that provide bus service to shopping malls, determining whether people are traveling to reach jobs at the malls, shop, or go to restaurants is difficult. In addition, CES and TranSystems noted that anyone can use these services, not just low-income populations. Although transit agency officials noted that people are not comfortable providing information on their income, FTA officials noted that they are not asking designated recipients to report the number of riders served or the incomes of these riders. FTA officials also noted that because SAFETEA-LU requires that JARC projects be derived from a coordinated plan identifying priorities to meet the transportation needs of low-income individuals traveling to employment or related activities, they believe they can presume that projects serve predominantly low-income populations. Nevertheless, because anyone can use JARC services, FTA will not know with certainty whether the targeted population is using the services to find work or better paying jobs.
- Number of jobs accessed: Although FTA does not plan to have designated recipients provide information on the number of jobs accessed, CES and TranSystems representatives, designated recipients, and other local officials we spoke with expressed concerns about determining the number of jobs accessed. They noted that assessing this performance measure is difficult because many designated recipients and local agencies do not have the information necessary to determine the number of jobs accessed in a given area by people using JARC services. Even if agencies could determine the number of jobs accessed, agencies would likely calculate it differently, resulting in inconsistent information. For example, while one official indicated his agency could survey riders, others indicated they would estimate the number of jobs accessed based on employment data or the number of businesses in the area.

FTA officials and CES and TranSystems representatives explained that, rather than ask designated recipients to provide the number of jobs accessed, they intend to request that designated recipients provide data on the geographical areas in which they provide JARC services. For fixed route projects, designated recipients will provide information on the geographic area surrounding the length of the route. For demand response services, designated recipients will provide the geographic area—such as the state or county—in which the service is provided. CES and TranSystems will use this information to estimate the number of jobs accessed. CES and TranSystems officials noted that, in some cases, the actual number of jobs accessed is known. For example, a subrecipient in Ohio provides transportation that only serves temporary employees traveling to jobs in a manufacturing plant. Consequently, the provider knows the number of jobs being accessed and can report that number rather than information on the geographical area.

In addition to limitations in the performance measures, the method to estimate the number of jobs accessed has limitations. CES and TranSystems plan to use the geographic data to calculate a very rough estimate of the number of jobs accessed. CES and TranSystems will use a Census Bureau program, the Longitudinal Employer-Household Dynamic (LEHD), to estimate the number of jobs accessed[44] by calculating the number of jobs in a given geographical area. For example, for fixed route services, CES and TranSystems will estimate the number of jobs within a ½-mile "zone" along the route, i.e., ¼-mile on either side of the route. For demand response services, CES and TranSystems will estimate the number of jobs within a geographical unit, such as the county in which a service is provided. According to CES and TranSystems officials, this approach only estimates the number of jobs accessed at a national level and cannot be used to estimate the number of jobs at a state or local level. This approach has other limitations:

- The LEHD program does not include information from all 50 states. As of September 2008, 47 states supplied data. Of those, 42 were included in the program.

[44]The LEHD began in 1997 as an initiative to merge available data on households and employment using advanced statistical techniques. Its broad purpose is to integrate data from administrative records, the Census, and surveys to create new information on U.S. society and the economy. LEHD combines federal and state administrative data on employers and employees with core Census Bureau censuses and surveys while protecting the individual confidentiality of people and firms providing the data. Through the Local Employment Dynamics partnership, states voluntarily supply employment data to the Census Bureau on the number of employees at individual worksites. These data are combined with other information to create Quarterly Workforce Indicators, which are geocoded and mapped according to census geography.

- For demand response services, CES and TranSystems can estimate the total number of jobs and low-wage jobs within specific geographic boundaries, such as a county or state. However, if the demand response service area does not correspond directly to specific geographic units, job information is not available.

FTA officials acknowledged these limitations and noted that CES and TranSystems have been working with FTA to improve the quality of the jobs accessed measure. Specifically, CES and TranSystems noted that this performance measure actually estimates the potential number of jobs, which overstates the number of jobs accessed. Consequently, CES and TranSystems developed two alternatives:

- translating ridership into jobs reached by assuming that individuals make round trips when traveling for work-related purposes, and dividing the number of trips by two; and
- comparing theoretical capacity to jobs accessed by determining the number of individuals who could be served and dividing by two (again assuming round trips).

CES and TranSystems noted that each of these approaches have advantages and disadvantages. For example, while the first alternative directly translates ridership into jobs, it also assumes that all riders are traveling to jobs, which is not realistic. Moreover, it does not consider that different people use services on different days. As a result, the estimates could misstate the number of jobs accessed. The second approach, which compares theoretical capacity to jobs accessed, considers the transit system's capacity. However, CES and TranSystems acknowledge that this approach may not be realistic as services are not necessarily filled to capacity while in operation. Although these approaches attempt to address the weaknesses of the current efforts to estimate jobs accessed, they could still misstate the extent to which the target population benefits from the JARC program.

CES and TranSystems have also developed measures for other JARC services allowed under SAFETEA-LU that cannot be measured using the number of riders and number of jobs accessed, such as informational services and capital projects. CES and TranSystems are using a matrix to capture key information regarding the projects such as the number of requests for information services mobility managers received or the number of additional vehicles purchased.

Evaluation of Economic Outcomes of JARC Programs Has Limitations in Survey and Analysis Design

The second study, conducted under contract with the University of Illinois at Chicago (UIC), will focus on analyzing the economic impact of the JARC program using data from a survey of JARC service users, program managers, and coordinated human services transportation plan participants.[45] As of May 2009, researchers were in the process of finalizing the survey instruments for this study. FTA expects UIC to issue a report in the spring of 2010.

According to FTA officials and UIC researchers, the survey design and analysis for the planned 2010 report will use a methodology similar to a June 2008 survey-based economic analysis that UIC conducted on JARC outcomes under TEA-21.[46] In the 2008 study, the researchers estimated the benefits and costs associated with the program.[47] Potential benefits of the JARC program include higher paying jobs that participants may gain as a result of being able to travel to areas with better paying jobs. Potential costs include those associated with operating the program.

However, we noted several limitations in the 2008 study, including weaknesses in the design of the survey as well as the analysis of data obtained from the survey. Although all surveys are potentially subject to sources of error, the researchers did not use standard practices that would help minimize these sources of error when developing and implementing the survey used in the 2008 report. This limitation could affect the reliability of the survey data used to estimate the economic impacts.

[45] In addition to evaluating the JARC program, this study will analyze the economic benefits of the New Freedom program and the effectiveness of the post-SAFETEA-LU coordinated planning provisions for JARC, New Freedom, and Section 5310.

[46] *Economic Benefits of Employment Transportation Services*, University of Illinois at Chicago (Chicago, Illinois: June 2008).

[47] A benefit-cost analysis is generally used to assess whether the social benefits of a program outweigh its social costs (that is, whether net benefits are positive), compared to alternatives, such as the status quo or the way the world would look without the program. The alternative that maximizes net benefits is expected to be an efficient investment of society's resources. Typically, in estimating net benefits, the sum total of the incremental (compared to the status quo) benefits is compared with the sum total of the incremental costs. According to FTA, the traditional cost benefit analysis approaches used in transportation or social service programs do not lend themselves to evaluating JARC and the UIC researchers developed a hybrid benefit-cost approach that combines methods used in transportation with methods from labor economics. For example, FTA indicated that the researchers measured the impact of the JARC program on other low-wage workers in the same labor market including effects such as wage deflation and job losses that might have occurred as low-skilled workers were transported to jobs where other workers were already employed.

Specifically, the researchers may have overstated the benefits to the target population.

For example, the survey estimates were reported as if they were based on a probability sample and were generalizable to the population that the JARC program targets. However, the estimates were not based on a probability sample and, therefore, should not be generalized. In addition, they did not disclose this fact or take it into account when developing overall economic impacts. According to FTA officials, the researchers were careful to not generalize the results of their survey research. While the report does note that generalizing the results is difficult, the report made several conclusions that, as written, appear to apply to the population of JARC users as opposed to the survey sample. For example, the report concluded that employment transportation services are providing valuable services to users and that those services are being appropriately targeted. In addition, the report indicates that the individuals using the services are greatly dependent on them, and that the benefits to the users are high and likely to persist over time. However, the report does not qualify the results to clarify that they apply only to the users surveyed. Without this qualification, the report appears to extend the results to all users, which would be inappropriate because the users surveyed were not selected as part of a probability sample. The absence of this qualification thus limits the usefulness of their assessment. In addition, the researchers did not consider the need to qualify the results when developing overall economic impacts.

In addition, the survey used in the 2008 study is subject to nonsampling errors, including coverage error, non-response error, and measurement error:

- The 2008 survey is subject to coverage error, which results when all members of the survey population do not have an equal or known chance of being sampled for participation. Standard practice is to note to whom and when the surveys are disseminated. For example, if the transportation system providing JARC services operates 24 hours a day, researchers would have to survey across all days and time frames. Otherwise, individuals using the service on days and times that researchers do not survey would have a zero chance of being selected. The researchers indicated that they rode the selected services for 6 to 12 hours so they could cover at least one if not both rush-hour periods and, where appropriate, they also rode during off-peak hours including late night and early morning. In addition, researchers said that in a few cases they administered surveys over multiple days to ensure that they surveyed a sufficient number of respondents. However, the researchers did not include in the study a detailed sampling plan that would fully explain how coverage issues were addressed. As a result, the extent of coverage error is unknown, and the 2008 survey results should not be generalized to all JARC users.

- The 2008 survey also suffers from nonresponse error, which results when people responding to a survey differ from sampled individuals who did not respond, in a way that is relevant to the study. Standard practice to minimize this type of error includes using a systematic sampling approach when disseminating surveys and noting, to the extent possible, who is not participating, to see if non-respondents differ from respondents.[48] For the June 2008 study, UIC researchers indicated that they boarded buses and developed a rapport with some riders. However, the researchers acknowledged that not all riders were willing to complete the survey. In addition, the study does not identify the survey response rate and did not consider potential differences between respondents and nonrespondents. Without this information, the extent to which the estimates are biased is unknown.
- Finally, the wording for the questions used in the 2008 survey may have resulted in inaccurate or uninterpretable responses. In general, standard practice includes pretesting and technical review of the instrument before administering to help minimize measurement error. Although the researchers indicated that they pretested the survey instrument and made changes based on the pretests and believed that the pretest was thorough, we found obvious weaknesses in the survey instrument. For example, we found that some response categories in the survey were not mutually exclusive or exhaustive, questions appeared ambiguous, and instructions for responding were not clear.

Collectively, we believe that these potential sources of error raise questions about the validity of the survey data as it was used to estimate the economic effect of the JARC program in the 2008 study. We found similar limitations in the draft survey instrument that the researchers have proposed to use for the 2010 study and provided specific technical review feedback to FTA and the researchers regarding these limitations. FTA

[48]Biased estimates can result when respondents and nonrespondents differ on the variables being studied.

officials indicated that the researchers had made numerous changes that incorporated our comments as well as the results of pretests and their own internal reviews.

We also identified limitations in the economic analysis used to estimate the benefits and costs of the JARC program in the June 2008 study. For example, the researchers used a before-and-after approach to analyze the benefits and costs.[49] That is, the program was analyzed in terms of its effect on individuals (for example, on changes in earnings) before and after using the service. However, this approach does not indicate what would have happened without the program. For example, an individual's earnings may have increased over time even without the program. The researchers said that because they implemented the survey just after the JARC service started, they believe they primarily captured the program's effects. The researchers also indicated that they plan to refine the survey questions for the next study to more precisely capture the program's effect and exclude significant life events that might also affect an individual's earnings.

In addition, the researchers found that, overall, the net benefits of the program are positive. However, when analyzing more specific aspects of the program, such as the benefits and costs of fixed route and demand response services, the researchers reported that the program's net benefits are negative.[50] The researchers attribute this conflicting result to their use of averages in computing net benefits[51] and indicated that they used

[49]The researchers also developed an alternative evaluation design to analyze the effect of the program but did not report a new societal net benefit estimate. Under this approach, the researchers compared a treatment with a control group, where the control group represented a scenario in which users would not have access to JARC services. The treatment group represented a scenario in which users would have access to JARC services.

[50]The researchers considered several scenarios in their analyses. They found that net benefits are positive overall but negative for subcategories in one of these, specifically the researchers' Scenario III base year analysis that uses a more conceptually-appropriate measure of economic effect (social surplus) and assesses the potential effect of the program on the labor market. The net benefit estimates for the other, less comprehensive base year scenarios were generally positive.

[51]Typically, net benefits are computed using the sum of incremental benefits minus the sum of incremental costs, not average values. The researchers said that the conflicting result is probably due to Simpson's Paradox, a condition that can arise when estimating an average using two or more subgroups of data. The average of the combined data can be different than the average of the subgroups due to, for example, different sample sizes or omitted variables.

averages to smooth out irregularities in the survey responses. For example, the study indicates that the survey data had a wide distribution with some large positive and negative values (for example, some survey respondents may have lost higher-paying jobs before using the JARC service and took a lower-paying job after using the service.) However, the extent to which the reported irregularities in the survey data are reasonable differences in responses between riders or are due to the survey limitations discussed above is not clear. In addition, the reported economic results make it difficult to ascertain whether the program is generating positive net benefits and whether it is an efficient use of society's resources.

The researchers acknowledged some of these limitations and indicated they have taken steps to improve their research design for the current study, such as incorporating changes into their survey instrument. They also indicated that they plan to make other improvements. We believe that changes to address the limitations could improve the usefulness of the results in assessing the economic effect of the JARC program.

Nevertheless, FTA does not have a comprehensive process in place to ensure that evaluations of the impact of the JARC program use generally accepted survey design and data analysis methodologies. Although FTA officials indicated that an FTA economist reviewed the researchers' proposed data collection and evaluation methodology at the beginning of the project, FTA did not review the draft report. FTA officials indicated that they did not have the expertise to do so and noted that another entity—such as the Bureau of Transportation Statistics within DOT's Research and Innovative Technology Administration—would need to assist with this type of evaluation. Since the study was published in 2008, FTA officials said that the results did not inform FTA's decisions about how to implement the JARC program. However, FTA indicated that the results of the study as well as other evaluations contribute to discussions on the program's future.

Conclusions

FTA has made progress in awarding JARC funds since Congress passed SAFETEA-LU in 2005, although FTA's delay in issuing final guidance and other challenges contributed to a lapse in some fiscal year 2006 funds. Now that the final guidance has been issued and recipients have had experience implementing the program, the expectation is that more fiscal year 2007 and 2008 funds will be awarded to implement more projects, and accordingly, less funds will lapse in the future.

Recipients have faced several challenges in implementing JARC. A message we consistently heard from designated recipients and subrecipients is that the requirements for the current program are extensive considering the relatively small amount of funding available. Although FTA and recipients are becoming accustomed to the new formula program and its requirements—which could lessen the severity of these challenges in the future—recipients told us that they continue to face challenges in a number of circumstances, such as when:

- designated recipients for large urbanized areas have jurisdiction over small urbanized and/or rural areas and when the service provided by an individual transit provider overlaps two or more of these areas;
- designated recipients are responsible for ensuring that organizations that do not traditionally receive FTA funding comply with FTA requirements;
- local agencies, particularly those in rural areas, have limited staff, funding, and/or expertise needed to update coordinated public transit-human services transportation plans; and
- JARC requirements duplicate the requirements for other programs, such as New Freedom and Section 5310.

The results of FTA's evaluations of the JARC programs under SAFETEA-LU may have limitations that could affect FTA's assessment of the program. FTA's current performance measures—number of rides and number of jobs accessed—have limitations that could misstate the program's performance. FTA's ongoing study of JARC's economic outcomes, conducted by UIC, may also have limitations if it utilizes the same survey design and data analysis methodology used in UIC's June 2008 study of the JARC program under TEA-21. While FTA does not have the expertise to review the methodologies used in these studies, other entities, such as the Bureau of Transportation Statistics within DOT's Research and Innovative Technology Administration, could assist with this review. Recognizing that FTA has improved its evaluation approach over time and that the JARC program is relatively small compared with FTA's regular transit formula programs, drawing on this expertise within DOT could provide additional assurances that the methodologies used in the evaluations follow generally accepted survey design and data analysis practices without expending significant additional resources.

Recommendations

We recommend that the Secretary of DOT direct the FTA to:

- Determine what actions FTA or Congress could take to address the challenges agencies have encountered. For example, these actions could include providing more specific guidance to assist large urbanized areas with jurisdiction over small urbanized or rural areas, or suggesting that Congress consider consolidating the application processes for JARC and other programs with similar requirements.
- Ensure that program evaluations use generally accepted survey design and data analysis methodologies by conducting a peer review of current and future program evaluations, including UIC's current study of the JARC program. This review could be conducted with the assistance of another agency within DOT, such as the Bureau of Transportation Statistics within DOT's Research and Innovative Technology Administration.

Agency Comments

DOT reviewed a draft of this report and provided comments by e-mail requesting that we incorporate information providing additional perspective on FTA's progress in implementing the JARC program, including its evaluations of the program, which we have done. For example, DOT officials noted that FTA's current evaluation framework responds to prior GAO concerns by using an access to jobs measure rather than an access to employment sites measure. We agree that FTA's current methodology for evaluating the JARC program—although still limited in some respects—represents an improvement over the agency's previous approaches and that the agency has been responsive to GAO's prior concerns. DOT also provided technical corrections, which we have incorporated as appropriate.

We are sending copies of this report to congressional committees with responsibility for transit issues; the Secretary of Transportation; the Administrator, Federal Transit Administration; and the Director, Office of Management and Budget. In addition, the report will be available at no charge on the GAO Web site at http://www.gao.gov.

If you have any questions regarding this report, please contact me at (202) 512-2834 or at wised@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made major contributions to this report are listed in appendix III.

David J. Wise

David Wise
Director, Physical Infrastructure Issues

Appendix I: Objectives, Scope, and Methodology

We are mandated to evaluate the Job Access and Reverse Commute (JARC) program every 2 years under the Safe, Accountable, Flexible, Efficient Transportation Equity Act-A Legacy for Users (SAFETEA-LU).[1] This report addresses (1) the extent to which FTA has awarded available JARC funds for fiscal years 2006 through 2008 and how recipients are using the funds since the changes went into effect under SAFETEA-LU, (2) the challenges recipients have faced in implementing the program, and (3) how FTA plans to evaluate the JARC program.

To determine the extent to which FTA awarded available JARC funds, we collected and analyzed JARC grants award data from FTA's Transportation Electronic Awards Management (TEAM) System. To assess the reliability of TEAM data, we (1) reviewed existing documentation related to the data source and (2) obtained information from the system manager on FTA's data reliability procedures. We also brought discrepancies we found in the data to FTA officials' attention so they could resolve them before we conducted our analyses. We determined that the data were sufficiently reliable for the purposes of our report. To examine how recipients have used JARC funds since SAFETEA-LU went into effect, we interviewed 26 designated recipients—9 states and 17 agencies representing large urbanized areas—and 16 subrecipients[2] that were selected from a nonprobability sample.[3] Table 4 lists the 26 designated recipients and table 5 lists the 16 subrecipients we interviewed.

[1]We last reported on the Federal Transit Administration's (FTA) progress in implementing JARC in November 2006. GAO, *Federal Transit Administration: Progress Made in Implementing Changes to the Job Access Program, but Evaluation and Oversight Processes Need Improvement*, GAO-07-43 (Washington, D.C.: Nov. 17, 2006).

[2]Designated recipients are state and local agencies that have been designated to administer and distribute JARC funds to local agencies. Under SAFETEA-LU, state agencies are required to be designated recipients for small urbanized and rural areas, while local agencies are identified as designated recipients for large urbanized areas. Designated recipients award JARC funds to subrecipients, which are local transit agencies, non-profit organizations, or local government authorities that receive JARC funds for eligible transit projects.

[3]Results from nonprobability samples cannot be used to make inferences about a population, because in a nonprobability sample some elements of the population being studied have no chance or an unknown chance of being selected as part of the sample.

Table 4: Designated Recipients Interviewed for Our Review

State	Agency
Arizona	Arizona Department of Transportation
California	California Department of Transportation
Connecticut	Connecticut Department of Transportation
Georgia	Georgia Department of Transportation
Illinois	Illinois Department of Transportation
New Jersey	New Jersey Transit
New York	New York State Department of Transportation
Pennsylvania	Pennsylvania Department of Transportation
Wisconsin	Wisconsin Department of Transportation
Large Urbanized Areas	**Agency**
Atlanta, Georgia	Metropolitan Atlanta Rapid Transit Authority and Atlanta Regional Commission
Augusta-Richmond County, Georgia—South Carolina	Augusta Richmond County Planning Commission and Lower Savannah Council of Governments
Buffalo, New York	Niagara Frontier Transportation Authority
Chicago, Illinois—Indiana	Regional Transit Authority
Lancaster, Pennsylvania.	Red Rose Transit Authority
Los Angeles—Long Beach—Santa Ana, California	Los Angeles County Metropolitan Transportation Authority[a]
Philadelphia, Pennsylvania.—New Jersey—Delaware—Maryland	Southeastern Pennsylvania Transit Authority
Phoenix—Mesa, Arizona	City of Phoenix Public Transit Department
Pittsburgh, Pennsylvania	Port Authority of Allegheny County
Riverside—San Bernardino, California	Southern California Association of Governments[b]
Rochester, New York	Rochester-Genesee Regional Transportation Authority
Sacramento, California	Sacramento Area Council of Governments
San Francisco—Oakland, California	Metropolitan Transportation Commission[c]
Savannah, Georgia.	Savannah Chatham Area Transit Authority
Washington, D.C.—Virginia—Maryland	Metropolitan Washington Council of Governments

Source: GAO analysis of interviewed agencies.

[a]Los Angeles County Metropolitan Transportation Authority is also the designated recipient for the Lancaster—Palmdale, Calif. large urbanized area.

[b]Southern California Association of Governments is also the designated recipient for the Indio—Cathedral City—Palm Springs, California; Temecula—Murrieta, California; and Victorville—Hesperia—Apple Valley, California large urbanized areas. The agency is located in Los Angeles, California.

[c]Metropolitan Transportation Commission is also the designated recipients for the Antioch, California; Concord, California; San Jose, California; and Santa Rosa, California large urbanized areas.

Table 5: Subrecipients Interviewed for Our Review

Agency	Location	Type of areas it serves
Alameda-Contra Costa Transit Agency	Oakland, California	Large urbanized area
Bucks County Transportation Management Agency	Philadelphia, Pennsylvania.	Large urbanized area
Chicago Transit Authority	Chicago, Illinois	Large urbanized area
City of Avondale	Avondale, Arizona	Small urbanized areas
City of Danville Mass Transit	Danville, Illinois	Small urbanized area
Coastal Georgia Regional Development Center	Brunswick, Georiga	Rural area
Ithaca-Tompkins County Transportation Council	Ithaca, New York	Small urbanized area
Kenosha Achievement Center	Kenosha, Wisconsin	Small urbanized areas
Los Angeles County Department of Public Works	Los Angeles, California	Large urbanized area
Maricopa County Human Services Department	Phoenix, Arizona	Large and small urbanized and rural areas
Metra Rail	Chicago, Illinois	Large urbanized area
Milwaukee County Transit System	Milwaukee, Wisconsin	Large urbanized area
Pace	Chicago, Illinois	Large urbanized area
Pima County Rural Transit	Pima, Arizona	Rural areas
San Luis Obispo Council of Governments	San Luis Obispo, California	Small urbanized and rural areas
Southwestern Wisconsin Community Action Program	Dodgeville, Wisconsin	Rural areas

Source: GAO analysis of interviewed agencies.

We collected and reviewed information from these recipients on the different types of JARC projects being planned or implemented, including demand response and fixed route transit services, auto loan projects, mobility management services, and vanpool services.[4] We selected the designated recipients based on a diverse range of criteria that included states and large urbanized areas that:

[4]Demand response transit services provide transportation between specific locations at a customer's request. For example, customers can arrange to be picked up at home and dropped off at their place of employment. Fixed route services provide transportation along a designated route or station, such as a bus or train route. Customers must arrange travel from their home to a bus or train station, where they are transported to the stop closest to their final destination. Customers then must arrange travel from the stop to their final destination. Mobility management services consist of planning and management activities and projects for delivering coordinated transportation services to customers, including elderly individuals, people with disabilities, and lower income individuals. These services focus on meeting individual customer needs through a wide range of transportation options and service providers and do not include operating public transportation services.

- received an increase or a decrease in JARC funds as a result of changing to the formula program;
- were previously interviewed for our November 2006 report;
- had awarded all or portions of fiscal year 2006 funds, as of May 2008;
- had not identified a designated recipient as of May 2008; and
- FTA and industry association officials suggested.

We also chose large urbanized areas that crossed multiple states and considered the geographic locations of states and large urbanized areas to obtain a wider range of geographic coverage and dispersion. We selected subrecipients that covered the three types of areas that were apportioned JARC funding under SAFETEA-LU—large and small urbanized as well as rural areas[5]—and were based on recommendations from designated recipients. These interviews cannot be generalized to the entire JARC recipient and stakeholder population because they were selected from a non-probability sample.

To identify the challenges recipients have encountered in implementing the program, we interviewed officials from our selected non-probability sample of designated recipients and subrecipients as well as 19 stakeholders, such as metropolitan planning organizations and local public transit agencies, to obtain their views on challenges associated with implementing the JARC program. Table 6 lists the 19 stakeholders we interviewed.

Table 6: Stakeholders Interviewed for Our Review

Agency	Location	Type of agency
Bay Area Rapid Transit	Oakland, California	Local transit agency
Delaware Valley Regional Planning Commission	Philadelphia, Pennsylvania	Metropolitan planning organization (MPO)
Tri-County Regional Planning Commission	Harrisburg, Pennsylvania	MPO
Access to Work Interagency Cooperative	Pittsburgh, Pennsylvania	Local agency
Southwestern Pennsylvania Commission	Pittsburgh, Pennsylvania	MPO
Augusta Public Transit	Augusta, Georgia	Local transit agency
Metropolitan Planning Commission	Savannah, Georgia	MPO

[5] Large urbanized areas are defined as urbanized areas with a population of more than 200,000. Small urbanized areas are defined as urbanized areas with a population of between 50,000 to 199,999. Rural areas are defined as areas having a population of less than 50,000.

Agency	Location	Type of agency
Maricopa Association of Governments	Phoenix, Arizona	MPO
Department of Workforce Development	Madison, Wisconsin	State agency
Madison Area Transportation Planning Board	Madison, Wisconsin	MPO
Southeastern Wisconsin Regional Planning Commission	Waukesha, Wisconsin	MPO
Chicago Metropolitan Agency for Planning	Chicago, Illinois	MPO
New York Metropolitan Transit Authority	New York City, New York	Local transit agency
New York Metropolitan Transportation Commission	New York City, New York	MPO
Metropolitan Planning Commission	Savannah, Georgia	MPO
Greater Buffalo-Niagara Regional Transportation Council	Buffalo-Niagara, New York	MPO
Genesee Transportation Council	Rochester, New York	MPO
City of Madison Metro Transit	Madison, Wisconsin	Local transit agency

Source: GAO analysis of interviewed agencies.

In addition, we interviewed the applicable FTA regions responsible for the states and large urbanized areas we visited to obtain their perspective on challenges identified in the region. We also interviewed officials from industry associations, including the American Association of State Highway and Transportation Officials (AASHTO), the American Public Transportation Association, the Community Transportation Association of America, and the National Association of Regional Councils to identify challenges faced by the agencies these associations represent. Our interviews with AASHTO included discussions with officials from state departments of transportation from California, Illinois, Iowa, New York, North Dakota, Oregon, and Texas. We summarized our interview responses to identify common challenges in implementing the program. We also reviewed relevant laws and regulations, including SAFETEA-LU and FTA's final guidance on administering JARC, and other FTA information, such as the Frequently Asked Questions document posted on FTA's Website, to clarify the guidance. To identify challenges faced by human services agencies associated with the coordinated human services transportation planning process, we interviewed officials from the U.S. Department of Labor and U.S. Department of Health and Human Services. Additionally, we interviewed officials of associations representing the elderly and disabled, including Easter Seals, AARP, the Association of Programs for Rural Independent Living, and North Country Independent Living to obtain their perspectives on consolidating JARC with other FTA transit programs, such as the New Freedom, Elderly Individuals and Individuals with Disabilities, and urbanized and rural area programs.[6]

To determine how FTA plans to evaluate the JARC program, we reviewed previous evaluations and interviewed officials from FTA and two contractors, TranSystems/CES and the University of Illinois at Chicago (UIC), that are evaluating the JARC program. For each evaluation, we assessed the contractors' scope and methodology. Specifically, for the TranSystems/CES evaluation, which focuses on JARC performance measures, we determined the contractor's plans to collect and analyze data on JARC projects. We also interviewed designated recipients, subrecipients and other state and local officials to obtain their perspectives on FTA's JARC performance measures. For the UIC evaluation, which focuses on JARC's economic impact and outcomes, we reviewed UIC's June 2008 evaluation of the JARC program under TEA-21 using standard survey and economic principles and practices as criteria, and interviewed UIC researchers to identify similarities and differences between UIC's methodologies for the prior and current studies and the implications those methodologies could have on UIC's current evaluation. We also reviewed and assessed the survey document UIC used on the prior evaluation as well as the survey documents UIC plans to use in the current study and provided feedback to the researchers.

[6] The New Freedom and the Elderly Individuals and Individuals with Disabilities programs provide funding for transportation-disadvantaged population. While the New Freedom program provides funding for new public transportation services and public transportation alternatives that assist individuals with disabilities, the Elderly Individuals and Individuals with Disabilities program provides formula funding for capital projects to assist in meeting transportation needs of elderly and persons with disabilities. FTA's urbanized and rural area program is commonly referred to as Section 5307 and Section 5311, respectively. Section 5307 urbanized area program provides formula funding for transit capital and operating assistance in urbanized areas, while the rural area program provides formula funding to states for public transportation services in rural areas.

Appendix II: Summary of Areas with Lapsed Fiscal Year 2006 JARC Funds

Service Area	Allocated Amount	Lapsed Amount (percent)
Large urbanized areas		
Aguadilla-Isabela-San Sebastian, Puerto Rico	$ 530,843	$ 530,843 (100%)
Austin, Texas	406,084	406,084 (100%)
Bakersfield, California	318,265	238,265 (74.9%)
Barnstable Town, Massachusetts	75,115	14,105 (18.8%)
Columbia, South Carolina	191,671	191,671 (100%)
Columbus, Georgia-Alabama	487,856	149,168 (30.6%)
Daytona Beach-Port Orange, Florida	136,539	136,539 (100%)
Durham, North Carolina	152,453	18,975 (12.4%)
Fayetteville, North Carolina	152,079	152,079 (100%)
Greenville, South Carolina	154,803	154,803 (100%)
Gulfport-Biloxi, Mississippi	116,718	116,718 (100%)
Harrisburg, Pennsylvania	118,352	118,352 (100%)
Honolulu, Hawaii	296,056	296,056 (100%)
Jackson, Mississippi	188,181	188,181 (100%)
Lexington-Fayette, Kentucky	125,080	125,080 (100%)
Miami, Florida	2,798,658	2,798,658 (100%)
Milwaukee, Wisconsin	586,353	307,613 (52.5%)
Mission Viejo, California	110,760	110,760 (100%)
Palm Bay-Melbourne, Florida	162,591	162,591 (100%)
Philadelphia, Pennsylvania-New Jersey-Delaware-Maryland	2,177,282	156,161 (7.2%)
Port St. Lucie, Florida	134,102	134,102 (100%)
Poughkeepsie-Newburgh, New York	138,244	138,244 (100%)

Service Area	Allocated Amount	Lapsed Amount (percent)
Reading, Pennsylvania	108,520	108,520 (100%)
Richmond, Virginia	325,063	292,557 (90.0%)
Riverside-San Bernandino, California	1,025,531	347,894 (33.9%)
San Juan, Puerto Rico	3,175,710	3,175,710 (100%)
Spokane, Washington-Idaho	178,704	178,704 (100%)
Victorville-Hesperia-Apple Valley, California	130,784	130,784 (100%)
Total[a]	**$14,163,709**	**$10,879,217 (76.8%)**
Total allocated to large urbanized areas	**$81,972,000**	**$10,879,217 (13.3%)**
Small urbanized areas in the state		
California	$2,846,331	$1,050,607 (36.9%)
Delaware	47,028	47,028 (100%)
Hawaii	51,652	51,652 (100%)
Indiana	672,488	18,627 (2.8%)
Louisiana	793,743	250,000 (31.5%)
Mississippi	142,431	142,431 (100%)
Nevada	37,708	37,708 (100%)
New York	513,343	426,704 (83.1%)
North Carolina	871,922	550,122 (63.1%)
Puerto Rico	2,571,505	2,571,505 (100%)
Utah	126,160	1,535 (1.2%)
Wyoming	97,515	97,515 (100%)
Total	$8,771,826	$5,245,434 (59.8%)
Total allocated to small urbanized areas	**$27,324,000**	**$5,245,434 (19.2%)**

Service Area	Allocated Amount	Lapsed Amount (percent)
Non-urbanized, rural areas in the state		
California	1,392,047	880,209 (63.2%)
Delaware	60,739	60,739 (100%)
Indiana	547,252	312,252 (57.1%)
North Carolina	1,377,832	862,267 (62.6%)
Puerto Rico	354,265	354,265 (100%)
Total	**$3,732,135**	**$2,469,732 (66.2%)**
Total allocated to non-urbanized rural areas	**$27,324,000**	**$2,469,732 (9.0%)**

Source: GAO analysis of FTA data.

[a]Although 33 out of 152 large urbanized areas allowed a portion of the fiscal year 2006 JARC funds to lapse, 5 of these—Dayton, Ohio; Madison, Wisconsin; New York, New York-Newark, New Jersey-Connecticut; Portland, Oregon-Washington; and Reno, Nevada---awarded about 99 percent of their allocated funds and are not included in this table.

Appendix III: GAO Contact and Staff Acknowledgments

GAO Contact

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Staff Acknowledgments

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