

FEDERAL DISCRETIONARY GRANT FREQUENTLY ASKED QUESTIONS

Please be advised that the information contained herein is provided for general informational purposes only and does not represent official statements of the U.S. Department of Transportation (USDOT) or the Florida Department of Transportation (FDOT). Answers provided to the Frequently Asked Questions are nonbinding and are based on the best available data.

MATCH AND COST SHARE

Can a local agency request Toll Development Credits (TDC) from FDOT to be used for the non-federal match?

In most cases, FDOT cannot authorize TDCs for local agency projects, such as roads, bridges, and sidewalks, as this would require FDOT to become a full funding partner and co-owner of the grant. This approach differs for transit projects, where TDCs may be available. However, the process requires a significant amount of lead time so discuss with your District's transit team as early as possible.

Can a local agency use a State Funded Grant Program for their non-federal match?

Locally Administered State Funded Grant Programs, such as [the Small County Road Assistance Program \(SCRAP\)](#), [Small County Outreach Program \(SCOP\)](#), or the [County Incentive Grant Program \(CIGP\)](#) may be eligible per USDOT; however, this requires a project-by-project review. These grant programs have statutorily defined criteria for project eligibility, which may not align with the federal discretionary grant purpose and eligible project components. If determined to be an eligible match source, USDOT would require confirmation that the agency has been or will be awarded the matching funds.

Please contact your District's [Local Programs Office](#) for specific questions related to the state grant programs.

Can in-kind match be used for the non-federal match?

This is determined on a case-by-case basis. Some federal grant programs allow in-kind contributions (non-monetary transactions that can include materials, services, or technical assistance) to fulfill the non-federal match requirements, while others do not. Refer to the Notice of Funding Opportunity (NOFO) on [grants.gov](https://www.grants.gov) to determine the specific non-federal match requirements for the grant. Be prepared to document any in-kind match claimed for auditing purposes.

Does additional non-federal match make a project more competitive?

While some programs prioritize a higher cost share, others are statutorily required to verify only that it meets the minimum requirement. This information will be listed in the NOFO.



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What happens if the project is not awarded the full amount or if project costs increase?

Local agencies should be aware of the possibility of a reduced award amount or funding gap and be prepared to address it before applying for funding opportunities. If a project is not fully funded, there may be opportunities to discuss a reduction of scope with USDOT before accepting the award and finalizing the grant agreement. If the scope is not reduced, the grant applicant must provide the additional match needed. The same process should be followed if the project award is insufficient to complete the project due to cost escalation.

Will FDOT provide state funds for the non-federal match for local agencies applying to discretionary grant opportunities?

FDOT does not have readily available funding for non-federal matches, as the State Legislature first approves all funding in the Five-Year Work Program. Local agencies are encouraged to think creatively about utilizing local funds and state funding opportunities to meet the non-federal match requirement.

State agencies, such as the Florida Department of Commerce, may have state grant funding that could serve as the non-federal match. However, state grant programs have statutorily defined criteria for project eligibility, which may not align with the federal discretionary grant purpose and eligible project components. If determined to be an eligible match source, USDOT may require confirmation that the local agency has been or will be awarded the matching funds.

APPLICATION DEVELOPMENT

What kind of project risks should local agencies anticipate and prepare for?

Risks can include cost escalation, difficulty getting specific materials, and tight schedules, among others. Consider potential concerns early to identify the risks and develop strategies to mitigate issues before submitting your application. For instance, is there sufficient contingency built into the estimated project costs? Is the project schedule realistic, given potential manufacturing and logistics delays?

Where do you find information on the federal discretionary grant programs?

The best resources are the [USDOT Grants Home Page](#), the [USDOT Navigator](#), and reviewing past NOFOs, which can be found on [grants.gov](#).

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BENEFIT COST ANALYSES (BCAs)

Is there a BCA methodology that must be used for the process?

Please refer to the [USDOT Benefit Cost Analysis Guidance](#), which is updated annually.

Applicants are encouraged to confirm in the NOFO that there are no additional provisions pertaining to the BCA requirements. As of October 2025, USDOT projects that require a BCA include the following:

- Better Utilizing Investments to Leverage Development (BUILD) Grant Program
- Bridge Investment Program – Federal Highway Administration (FHWA)
- Consolidated Rail Infrastructure and Safety Improvements (CRISI) Program – Federal Railway Administration (FRA)
- Federal-State Partnership for Intercity Passenger Rail (FSP-National Grants only) - FRA
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- National Infrastructure Project Assistance program (Mega)
- Nationally Significant Multimodal Freight and Highway Projects Grants Program (INFRA)
- Port Infrastructure Development Program (PIDP) Grants (Large Projects only) – Maritime Administration (MARAD)
- Promoting Resilient Operations for Transformative, Efficient, and Cost-Saving Transportation Program (PROTECT) (Resilience Improvement Grants and Community Resilience and Evacuation Route Grants only) - FHWA
- Rural Surface Transportation Grant Program (Rural)

PROJECT DELIVERY

What is a Direct Recipient vs Local Area Program (LAP) Delivery?

A Direct Recipient is a non-federal entity that receives a federal award directly from a federal awarding agency to complete a project, often through a discretionary grant. As a Direct Recipient for transportation project funding, an applicant would work directly with USDOT.

A LAP-delivered project involves FDOT allocating federal funding to a local agency, often originating from USDOT formula funding allocations. A Local Agency must undergo [LAP Certification](#) to be eligible for Federal-Aid Highway Program project funding. During project delivery, FDOT will support federal environmental requirements, inspections, and other needs that would fall under the purview of USDOT if the local agency were a Direct Recipient.

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Can FDOT help deliver a project through the Local Agency Program?

If a local agency is a Direct Recipient of federal funds, the agency will work directly with USDOT and FDOT does not have a role. However, becoming LAP certified will help prepare agencies to successfully deliver a project, as this process prepares agencies to utilize federal funding. If your agency is not presently [LAP certified](#), please contact your District Local Programs Office to discuss potential options or opportunities for partnership.

Do procurement policies need to meet federal guidelines? How do procurement policies differ from federal and non-federal projects?

Before applying for a grant, ensure existing procurement policies and actions are consistent with federal guidelines located in [2 Code of Federal Regulations \(CFR\) 200 Subpart D](#). The [LAP Manual](#) and [LAP Sub Recipient Compliance Assessment Tool](#) also provide federal procurement guidelines.

Non-federal grants are governed by state statutes, administrative codes, and the grant agreement provided by the state issuing agency. Consistency with [Florida Statute \(F.S.\) 287.057](#) is required.

How do you meet project delivery deadlines with grant funded projects and what may cause project delivery delays?

Applicants should select the project phase that matches the schedule and any deadlines listed in the NOFO for expending funds, and request funding accordingly. It is essential to review the project delivery timeline and scope to include only those commitments that can be realistically accomplished within the grant program's specified period.

The federal procurement process may extend beyond typical project delivery timelines, which can result in delays. Additional requirements, such as ensuring the necessary number of bidders for fair competition and procurement, or meeting compliance standards like the Build America, Buy America (BABA) Act, may also contribute to potential delays.

PLANNING CONSISTENCY

What is planning consistency for local projects?

Capital construction projects must be included in the applicable planning documents (e.g., Capital Improvement Program (CIP), Long Range Transportation Plan (LRTP), Transportation Improvement Program (TIP), and State Transportation Improvement Program (STIP)), with consistent details and scope to ensure planning consistency. Projects outside of Metropolitan Planning Organization (MPO) areas should be included in the CIP. Federal consistency in planning assistance and standards can be reviewed in [23 CFR Part 450 Subpart B](#).