



November 2023

DISCRETIONARY TRANSPORTATION GRANTS

DOT Should Better Align Its Application Evaluation Process with Federal Guidance

Accessible Version

GAO Highlights

Highlights of [GAO-24-106280](#), a report to congressional committees

Why GAO Did This Study

Since 2009, DOT has awarded over \$14 billion through a discretionary grant program referred to by DOT as RAISE. The Infrastructure Investment and Jobs Act authorized RAISE for fiscal years 2022 through 2026 and detailed requirements for DOT to use in administering the program.

The act also includes a provision for GAO to examine DOT's administration of the RAISE program. This report: (1) describes DOT's application evaluation process, (2) examines challenges applicants reported experiencing and how DOT addressed these challenges, and (3) assesses the extent to which DOT's implementation of its application evaluation process aligned with federal guidance.

GAO reviewed relevant laws and DOT documents, such as RAISE's evaluation plan and meeting minutes, and interviewed DOT officials. GAO also conducted a generalizable survey of eligible fiscal year 2022 RAISE applicants. The response rate was 67 percent.

What GAO Recommends

GAO is making five recommendations to DOT regarding the RAISE program: (1) address applicant challenges with developing a benefit-cost analysis, (2) implement additional oversight of evaluation teams, (3) consistently document specific evaluation decisions, (4) identify all selection factors, and (5) document specific rationales for selection decisions. DOT concurred with three recommendations, partially concurred with one, and did not concur with one. GAO continues to believe these recommendations should be fully implemented.

View [GAO-24-106280](#). For more information, contact Elizabeth Repko at (202) 512-2834 or repkoe@gao.gov.

November 2023

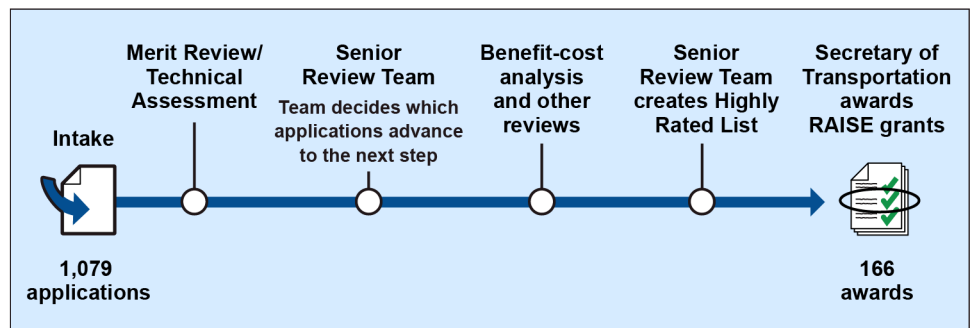
DISCRETIONARY TRANSPORTATION GRANTS

DOT Should Better Align Its Application Evaluation Process with Federal Guidance

What GAO Found

In fiscal year 2022, the U.S. Department of Transportation (DOT) awarded \$2.25 billion to 166 road, rail, and other surface transportation projects through a grant program known as Rebuilding American Infrastructure with Sustainability and Equity (RAISE). DOT established a multiphase process which included evaluating applications against criteria in a merit review phase and evaluating applicant-submitted benefit-cost analyses. These analyses require applicants to show if a project expects greater benefits than costs.

Fiscal Year 2022 RAISE Application Evaluation and Selection Process



Source: GAO analysis of U.S. Department of Transportation RAISE evaluation process, data and GAO (icons). | GAO-24-106280

Accessible text for Fiscal Year 2022 RAISE Application Evaluation and Selection Process

1. Intake (1,079 applications).
2. Merit Review: Technical Assessment.
3. Senior Review Team: Team decides which applications advance to the next step.
4. Benefit cost analysis and other reviews.
5. Senior Review Team creates highly rated list.
6. Secretary of Transportation awards RAISE grants (166 awards)

Source: GAO analysis of U.S. Department of Transportation RAISE evaluation process, data and GAO (icons). | GAO-24-106280

In GAO's survey of RAISE applicants, 69 percent of capital grant applicants reported that they found developing the benefit-cost analysis very or moderately challenging. For example, some applicants told GAO they did not have the staff capacity or expertise to complete this analysis. DOT has provided guidance and webinars but has not fully reviewed if additional resources for applicants could more fully address their challenges. Addressing these challenges could help applicants more fully assess their

projects' benefits and costs and give DOT the information it needs to make cost-effective award decisions.

DOT's implementation of its process for evaluating RAISE applications did not fully align with federal guidance for discretionary grant programs. Specifically, GAO found that DOT did not:

- sufficiently assess whether evaluation teams consistently applied the merit review criteria,
- consistently document decisions for advancing applications expected to have greater costs than benefits,
- publicly disclose two selection factors used to make award decisions, or
- consistently document a specific explanation for not selecting certain Highly Rated projects for funding.

Strengthening the RAISE evaluation process in these areas would position DOT to more fully demonstrate that it is implementing the program with enhanced transparency and making fair grant award decisions.

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Abbreviations

BCR	benefit-cost ratio
BUILD	Better Utilizing Investments to Leverage Development
DOT	Department of Transportation
FASTLANE	Fostering Advancements in Shipping and Transportation for the Long-term Achievement of National Efficiencies
IIJA	Infrastructure Investment and Jobs Act
INFRA	Infrastructure for Rebuilding America
NEPA	National Environmental Policy Act
NOFO	notices of funding opportunity
OMB	Office of Management and Budget
OMB Guidance	OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
PROTECT	Promoting Resilient Operations for Transformative, Efficient, and Cost-Saving Transportation
RAISE	Rebuilding American Infrastructure with Sustainability and Equity
RFP	request for proposal
TIGER	Transportation Investment Generating Economic Recovery

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November 6, 2023

The Honorable Maria Cantwell
Chair
The Honorable Ted Cruz
Ranking Member
Committee on Commerce, Science, and Transportation
United States Senate

The Honorable Sam Graves
Chair
The Honorable Rick Larsen
Ranking Member
Committee on Transportation and Infrastructure
House of Representatives

Since 2009, the U.S. Department of Transportation (DOT) has awarded over \$14 billion to improve surface transportation across the nation through a discretionary grant program DOT currently refers to as Rebuilding American Infrastructure with Sustainability and Equity (RAISE).¹ In a discretionary grant program, DOT awards funds for transportation projects through a competitive process, which can include rating applications against established selection criteria, rather than distributing funds by a statutory formula. In fiscal year 2022, DOT awarded about \$2.25 billion to 166 projects—the most funding and the largest number of grants awarded in a single year in program history up to that point.² Recipients may use RAISE funding for a variety of projects, including road, transit, and maritime infrastructure investments that are intended to have a significant local or regional impact. Tribal, state, and local governments and port authorities, as well as U.S. territories and possessions, among others, are eligible for RAISE funding.

We have reported on issues with DOT’s administration of discretionary grant programs, including RAISE, related to the consistency and

¹The program is set out in statute as the Local and Regional Project Assistance program in 49 U.S.C. § 6702. It was formerly known as Transportation Investment Generating Economic Recovery (TIGER) and Better Utilizing Investments to Leverage Development (BUILD). DOT renamed the program RAISE in fiscal year 2021. In this report, we refer to all iterations of the program as RAISE unless otherwise noted.

²On June 28, 2023, DOT announced about \$2.26 billion in RAISE awards to 162 projects for fiscal year 2023 RAISE funding.

transparency of DOT's application evaluation process.³ For example, in 2019, we reported that, through a discretionary grant program known as Infrastructure for Rebuilding America (INFRA), DOT awarded some projects that did not address all of the selection criteria and DOT's documentation did not provide insight into why DOT selected projects for awards. Further, in 2016 we recommended that DOT issue a directive that governs department-wide and Operating Administration discretionary grant programs. We subsequently designated this as a priority recommendation. As of September 2023, DOT has not taken steps to address this recommendation.⁴

Two laws funded and detailed requirements for the fiscal year 2022 RAISE grant program, the Infrastructure Investment and Jobs Act (IIJA) and the Consolidated Appropriations Act, 2022.⁵ The IIJA authorized the program for 5 years—from fiscal year 2022 through fiscal year 2026. It also appropriated a total of \$7.5 billion for the program—\$1.5 billion to DOT for fiscal year 2022, along with an additional \$6 billion for awards for the remaining 4 years.⁶ The Consolidated Appropriations Act, 2022 appropriated an additional \$775 million for the fiscal year 2022 RAISE program for a combined total of \$2.275 billion available for fiscal year 2022 awards. The IIJA and the Consolidated Appropriations Act, 2022 also established a number of requirements for DOT. These included providing up to 100 percent federal funding for capital projects located in rural areas, Historically Disadvantaged Communities, or Areas of

³GAO, *Discretionary Transportation Grants: DOT Should Better Communicate Federal Share Requirements to Applicants*, [GAO-23-105639](#) (Washington, D.C.: Nov. 17, 2022); *Discretionary Transportation Grants: DOT Should Clarify Application Requirements and Oversight Activities*, [GAO-22-104532](#) (Washington, D.C.: Apr. 6, 2022); *Discretionary Transportation Grants: Actions Needed to Improve Consistency and Transparency in DOT's Application Evaluations*, [GAO-19-541](#) (Washington, D.C.: June 26, 2019); *DOT Discretionary Grants: Problems with Hurricane Sandy Transit Grant Selection Process Highlight the Need for Additional Accountability*, [GAO-17-20](#) (Washington, D.C.: Dec. 14, 2016); and *Surface Transportation: Department of Transportation Should Measure the Overall Performance and Outcomes of the TIGER Discretionary Grant Program*, [GAO-14-766](#) (Washington, D.C.: Sept. 23, 2014).

⁴See GAO, *Priority Open Recommendations: Department of Transportation*, [GAO-23-106477](#) (Washington, D.C.: May 9, 2023).

⁵IIJA, Pub. L. No. 117-58, 135 Stat. 429 (2021); Consolidated Appropriations Act, 2022, Pub. L. No. 117-103, 136 Stat. 49.

⁶There is a total of \$4.5 billion available for the final 3 years of the RAISE IIJA authorization (fiscal years 2024 through 2026).

Persistent Poverty.⁷ The IIJA also established project and applicant eligibility requirements and selection criteria for DOT to use in awarding grants.⁸

The IIJA includes a provision for GAO to examine DOT's administration of the RAISE grant program.⁹ In this report, for fiscal year 2022 RAISE funding, we (1) describe the method DOT designed to rate applications using the statutory selection criteria and applicants' views on the clarity of this method, (2) identify challenges applicants reported experiencing when applying to RAISE and examine how DOT has addressed these challenges, and (3) assess the extent to which DOT's implementation of its application evaluation process aligned with federal guidance.

For all objectives, we reviewed relevant laws and DOT notices of funding opportunity (NOFO).¹⁰ In addition, we interviewed DOT officials to understand how they administered the fiscal year 2022 RAISE program.¹¹

To describe the method DOT designed to rate applications using the statutory selection criteria, we reviewed documentation such as DOT's internal RAISE evaluation plan. To describe applicants' views on the clarity of this method, we conducted a generalizable survey of eligible fiscal year 2022 RAISE applicants.¹² The survey asked applicants about their views on the clarity of DOT's selection criteria descriptions, clarity and usefulness of the RAISE NOFO, and transparency of DOT's

⁷The IIJA defined rural areas for the purpose of the RAISE program as any area that is not in an urbanized area with a population greater than 200,000 residents based on the most recent decennial census. The IIJA also defined Area of Persistent Poverty. For the full definition of Area of Persistent Poverty, see app. I. DOT defined Historically Disadvantaged Communities for the fiscal year 2022 RAISE program using DOT's interim definition for the Justice40 Initiative. This definition classifies communities on a variety of factors including transportation access disadvantage, health disadvantage, and environmental disadvantage.

⁸The IIJA and Consolidated Appropriations Act, 2022 also directed DOT to consider modal and geographic diversity when making awards.

⁹IIJA, § 21202(a), 135 Stat. at 675 (2021) (codified as amended at 49 U.S.C. § 6702(k)(2)).

¹⁰See app. I for additional information on our scope and methodology.

¹¹We reviewed the fiscal year 2022 RAISE program as it was the most recently completed funding round when we started this work.

¹²We received 562 responses from 842 eligible applicants surveyed, for a response rate of 67 percent.

application evaluation process, among other things.¹³ A more detailed description of the survey and survey responses is included in appendix II.

To identify the challenges applicants reported experiencing and examine how DOT has addressed these challenges, we surveyed applicants on the challenges they experienced applying for fiscal year 2022 RAISE funding as well as their views on DOT resources. To develop appropriate survey questions, we interviewed a non-generalizable sample of five organizations that applied for fiscal year 2022 RAISE funding. We selected applicants to interview based on factors including whether they received a fiscal year 2022 RAISE grant, organization type (state government, city government, etc.), project type (road, transit, etc.), and project location (urban, rural, Area of Persistent Poverty, etc.). Further, to understand the perspective of organizations that considered applying to RAISE but ultimately did not, we interviewed a non-generalizable sample of individuals who attended a RAISE webinar but did not apply for fiscal year 2022 funding.¹⁴ We selected these individuals based on their organization type, region (e.g., West, Midwest, South), and whether the individual's organization had previously applied for RAISE funding.

To assess the extent to which DOT's implementation of its application evaluation process aligned with federal guidance, we analyzed RAISE grant application evaluation and award data and documentation, such as meeting minutes and other RAISE program documents. We compared information from RAISE grant application evaluation and award data and DOT documentation against federal requirements for discretionary grant programs.¹⁵ These requirements are contained in federal guidance including the Office of Management and Budget's *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (OMB Guidance) and DOT's *Guide to Financial Assistance*.¹⁶ The collective guidance establishes requirements for discretionary grant programs including requirements related to fairness and transparency. To assess the reliability of DOT data, we reviewed DOT documentation,

¹³The results of our survey are generalizable to all fiscal year 2022 RAISE applicants, unless otherwise noted.

¹⁴These individuals represented four organizations.

¹⁵RAISE grant application evaluation and award data included information on the characteristics of the project, ratings assigned by DOT, whether DOT awarded the project funding, and how much funding DOT awarded.

¹⁶2 C.F.R. Part 200, and App. I to Part 200. DOT's *Guide to Financial Assistance* incorporates the OMB Guidance requirements.

conducted logic tests on the data, and traced key information back to source documents. We determined that this data was sufficiently reliable for our purposes of understanding DOT's application evaluation process and describing the distribution of RAISE funding.

We conducted this performance audit from October 2022 to November 2023 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 obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

DOT detailed the requirements and evaluation process for fiscal year 2022 RAISE funding in two key documents: (1) a NOFO and (2) an internal evaluation plan. The RAISE NOFO provided applicants with information on the program, who is eligible to apply, the selection criteria, evaluation process, and required items for the application, among other things. DOT posted the RAISE NOFO on grants.gov and DOT's website. The evaluation plan described the application evaluation process, selection criteria, evaluation process ratings, and documentation requirements for the evaluation process, among other things.

The IIJA, enacted on November 15, 2021, set three deadlines for DOT to issue a NOFO soliciting applications, accept applications, and announce awards for the fiscal year 2022 RAISE program. DOT met all three deadlines. Specifically,

- The IIJA requires DOT to publish a NOFO within 60 days of the date on which funds are made available (for fiscal year 2022 this was the date of enactment of the IIJA). DOT met this requirement by publishing the NOFO on January 14, 2022.
- The IIJA requires DOT to accept applications no later than 90 days after publishing the NOFO. DOT met this requirement by setting an application deadline of April 14, 2022.
- The IIJA requires DOT to announce the awards no later than 270 days after the date on which funds are made available (for fiscal year

2022 this was the date of enactment of the IIJA). DOT met this requirement by announcing the awards on August 11, 2022.¹⁷

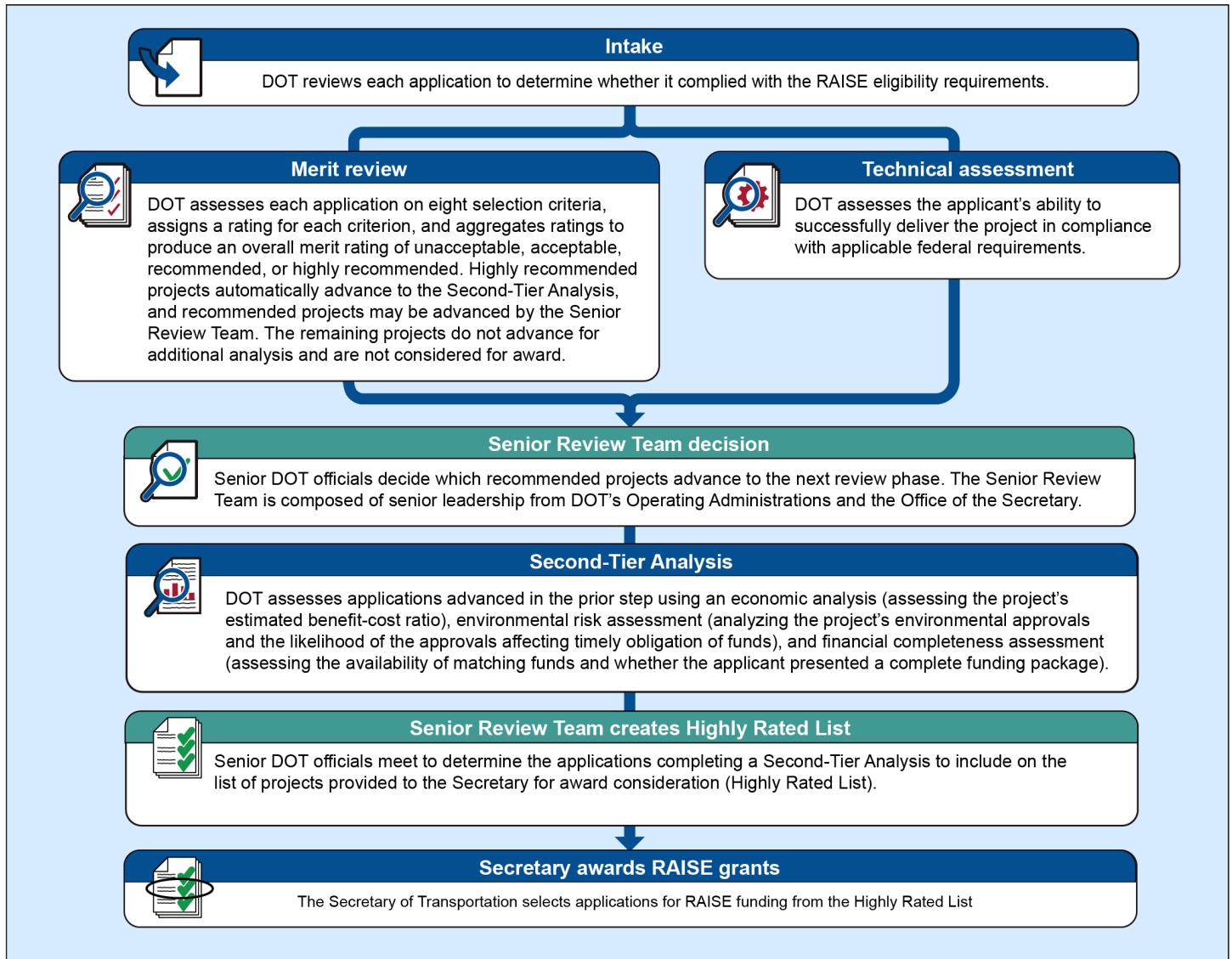
DOT directed applicants to submit several items in the application. These included a description of the project's location (including whether the project was in an Area of Persistent Poverty or Historically Disadvantaged Community), a project budget, a narrative describing how the project aligned with the selection criteria, and a benefit-cost analysis comparing the project's expected benefits to its expected costs.¹⁸

DOT outlined its multiphase application evaluation process in the RAISE NOFO and evaluation plan. This process included a "merit review" phase evaluating applications against the selection criteria and a "Second-Tier Analysis" phase, which included an evaluation of the applicant's benefit-cost analysis. See figure 1.

¹⁷The Secretary of Transportation signed the award selection memo on August 8, 2022. DOT publicly announced the awards on August 11, 2022. DOT officials noted that a portion of the time between the signing of the selection memo and announcement of awards was the application of a statutory notification provision at 49 U.S.C. § 311(a) requiring DOT to provide notice of competitive grant awards to specified congressional committees at least 3 full business days before the announcement is made by DOT.

¹⁸DOT did not require a benefit-cost analysis for applications requesting funding for the planning, preparation or design of projects that do not result in construction (planning grants).

Figure 1: Application Evaluation Process for the Fiscal Year 2022 RAISE Grant Program as Described in the Notice of Funding Opportunity and Evaluation Plan



Source: GAO analysis of U.S. Department of Transportation (DOT) Rebuilding American Infrastructure with Sustainability and Equity (RAISE) evaluation process, and GAO (icons). | GAO-24-106280

Accessible text for Figure 1: Application Evaluation Process for the Fiscal Year 2022 RAISE Grant Program as Described in the Notice of Funding Opportunity and Evaluation Plan

- 1) Intake: DOT reviews each application to determine whether it complied with the RAISE eligibility requirements.

- a) **Merit Review:** DOT assesses each application on eight selection criteria, assigns a rating for each criterion, and aggregates ratings to produce an overall merit rating of unacceptable, acceptable, recommended, or highly recommended. Highly recommended projects automatically advance to the Second-Tier Analysis, and recommended projects may be advanced by the Senior Review Team. The remaining projects do not advance for additional analysis and are not considered for award.
 - b) **Technical Assessment:** DOT assesses the applicant's ability to successfully deliver the project in compliance with applicable federal requirements.
- 2) **Senior Review Team decision:** Senior DOT officials decide which recommended projects advance to the next review phase. The Senior Review Team is composed of senior leadership from DOT's Operating Administrations and the Office of the Secretary.
 - 3) **Second-Tier Analysis:** DOT assesses applications advanced in the prior step using an economic analysis (assessing the project's estimated benefit-cost ratio), environmental risk assessment (analyzing the project's environmental approvals and the likelihood of the approvals affecting timely obligation of funds), and financial completeness assessment (assessing the availability of matching funds and whether the applicant presented a complete funding package).
 - 4) **Senior Review Team creates Highly Rated List:** Senior DOT officials meet to determine the applications completing a Second-Tier Analysis to include on the list of projects provided to the Secretary for award consideration (Highly Rated List).
 - 5) **Secretary awards RAISE grants:** The Secretary of Transportation selects applications for RAISE funding from the Highly Rated List.

Source: GAO analysis of U.S. Department of Transportation (DOT) Rebuilding American Infrastructure with Sustainability and Equity (RAISE) evaluation process, and GAO (icons). | GAO-24-106280

Note: DOT did not evaluate planning grant applications using the economic analysis or environmental risk assessment.

Following the application evaluation process, DOT publicly announced the recipients of fiscal year 2022 RAISE funding.¹⁹ Subsequently, DOT offered feedback to applicants not selected for award during debrief meetings.

In March 2022, DOT issued its strategic plan for fiscal years 2022 through 2026. The strategic plan included six strategic goals addressing (1) safety, (2) economic strength and global competitiveness, (3) equity, (4) climate and sustainability, (5) transformation, and (6) organizational excellence. According to DOT, this is the Department's first strategic plan that includes equity as a strategic goal.²⁰ The Biden administration's Justice40 Initiative also addresses equity.²¹ In this initiative, the administration established a goal that 40 percent of the overall benefits of certain federal investments, such as grant programs, flow to disadvantaged communities. The administration identified RAISE as a covered program under the Justice40 Initiative.

¹⁹According to section F of the fiscal year 2022 RAISE NOFO, after selection, successful applicants would be required to demonstrate an effort to (1) consider climate change and environmental justice, as described in the NOFO, (2) improve racial equity and reduce barriers to opportunity, as described in the NOFO, and (3) create good-paying jobs with the free and fair choice to join a union and incorporate strong labor standards, as described in the NOFO, to the full extent possible consistent with the law, among other requirements. Applicants were to certify that they had taken actions outlined in the NOFO or propose new activities to address (1) climate change and environmental justice and (2) racial equity and barriers to opportunity.

²⁰In the strategic plan, DOT defined equity as supporting and engaging people and communities to promote, safe, affordable, accessible, and multimodal access to opportunities and services while reducing transportation-related disparities, adverse community impacts, and health effects. The strategic plan also identified increasing the number of first-time DOT discretionary grant applicants from disadvantaged communities as a key performance indicator under the equity strategic goal.

²¹See Executive Order 14008, § 223, *Tackling the Climate Crisis at Home and Abroad*, 86 Fed. Reg. 7619 (Feb. 1, 2021).

DOT Designed a Method for Rating Projects against Each Statutory Selection Criteria, which Applicants Found to Be Clear

DOT Defined the Statutory Selection Criteria and Created a Rubric to Assign Merit Ratings

DOT created a method for initially rating fiscal year 2022 RAISE grant applications against eight high-level selection criteria established in the IIJA.²² Federal guidance requires that, except where prohibited by federal statute, federal discretionary grant awarding agencies are to design an application evaluation process to award discretionary grant funding, such as RAISE.²³ DOT established a process to evaluate applications during the merit review phase, as outlined in the RAISE NOFO. DOT's method consisted of defining the statutory selection criteria in detail in the RAISE NOFO and evaluating applications against each selection criterion. In these evaluations, DOT used what it referred to as a "rubric" to assign a rating for each criterion. The rubric identified demonstrating benefits for underserved, overburdened, or disadvantaged communities as one of several ways that an application could receive the highest rating across all selection criteria. DOT then aggregated those ratings to assign an overall merit rating, as described below.

Defining Statutory Selection Criteria

DOT defined the statutory selection criteria in detail in the RAISE NOFO because the IIJA listed the criteria with limited detail, according to DOT officials. For instance, the IIJA required DOT to evaluate the extent to which a project "improves safety" but did not define what "improves safety" means. Because of this, DOT officials said, they needed to provide definitions for those criteria. DOT officials said that DOT

²²The IIJA required DOT to evaluate applications using 10 selection criteria, which the IIJA categorized into primary and additional selection criteria. DOT considered two of the additional selection criteria, project readiness and cost effectiveness, as part of its Second-Tier Analysis. DOT evaluated project readiness through a technical assessment, environmental risk assessment, and financial completeness assessment. DOT evaluated cost effectiveness by evaluating applicant benefit-cost analyses.

²³OMB, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, 2 C.F.R. § 200.205; DOT, *Guide to Financial Assistance*, § 4.5 (October 2019).

leadership provided guidance on how to define each selection criterion and examples for applicants to demonstrate how projects can align with the criterion.

DOT’s selection criteria definitions aligned with administration priorities.²⁴ For example, DOT’s definition of the safety criterion in the RAISE NOFO referenced several aspects such as the extent to which a project targets a known safety problem and the degree to which the project reduces injuries or fatalities for underserved, overburdened, or disadvantaged communities.²⁵ In addition, DOT’s definition of the environmental sustainability criterion referenced projects that address the disproportionate negative environmental impacts of transportation on disadvantaged communities. Table 1 shows the IJJA selection criteria and DOT’s definitions of those criteria.

Table 1: IJJA Selection Criteria and U.S. Department of Transportation (DOT) Definitions of the Selection Criteria in the Fiscal Year 2022 RAISE NOFO

IJJA selection criteria	DOT definition of the selection criteria
Improves safety	The extent to which the project targets a known safety problem and seeks to protect motorized and non-motorized travelers and communities from health and safety risks; the project’s estimated impacts on the number, rate, and consequences of crashes, fatalities, and serious injuries among transportation users; the degree to which the project addresses inequities in crash victims, among other things.
Improves environmental sustainability	The extent to which the project incorporates considerations of climate change and environmental justice in the planning stage and in project delivery; the degree to which the project addresses the disproportionate negative environmental impacts of transportation on disadvantaged communities; whether the project will promote energy efficiencies, support fiscally responsible land-use and transportation efficient design; among other things.

²⁴DOT’s selection memo stated “the Department referenced Administration priorities within the descriptions of the statutory criteria, including priorities for projects that create good-paying jobs, improve safety, apply transformative technology, explicitly address climate change, and advance equity.”

²⁵DOT derived “underserved communities” from Executive Order 13985, *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*, 86 FR 7009. Underserved communities refers to populations sharing a particular characteristic, as well as geographic communities, that have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life. For disadvantaged communities DOT used the interim definition developed as part of DOT’s implementation of the Justice40 Initiative. The RAISE NOFO defined overburdened communities as minority, low-income, tribal, or indigenous populations or geographic locations in the United States that potentially experience disproportionate environmental harms and risks.

Letter

IIJA selection criteria	DOT definition of the selection criteria
Improves quality of life of rural areas or urban areas	The extent to which the project improves quality of life in rural areas or urbanized areas, including projects that increase affordable and accessible transportation choices and equity for individuals; enhance the unique characteristics of the community; proactively address racial equity or other disparities and barriers to opportunity, among other things.
Improves mobility and community connectivity	The extent to which the project will increase mobility and expand connectivity for motorized and non-motorized travelers or underserved communities to transportation, jobs, and business opportunities by removing barriers for individuals and communities; how the project increases the walkability and accessibility for pedestrians and encourages thriving communities for individuals to work, live, and play by creating transportation choices for individuals to move freely with or without a car, among other things.
Increases economic competitiveness and opportunity, including increasing tourism opportunities	The degree to which the project improves system operations to increase travel time reliability and manage travel demand for goods movement and results in long-term job creation by supporting good-paying jobs directly related to the project with free and fair choice to join a union, among other things.
Contributes to a state of good repair	Whether and to what extent the project addresses current and projected vulnerabilities that will threaten future transportation network efficiency, mobility of goods or accessibility and mobility of people, or economic growth, among other things.
The project sponsors collaborated with other public and private entities	The extent to which the project has or will engage diverse people and communities and demonstrate equity considerations and community input and ownership, particularly among disadvantaged communities, are meaningfully integrated into transportation investments; demonstrate strong collaboration and support among a broad range of stakeholders, including community-based organizations, other public or private entities and labor unions, among other things.
The project adopts innovative technologies or techniques, including: (i) innovative technology (ii) innovative project delivery techniques (iii) innovative project financing	The extent to which the project uses innovative strategies including technologies, project delivery, or innovative financing, among other things.

Source: The Infrastructure Investment and Jobs Act (IIJA) and the fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) notice of funding opportunity (NOFO). | GAO-24-106280

DOT officials told us that they did not create new selection criteria and were provided the statutory authority to define the statutory selection criteria. Specifically, they said the IIJA provided DOT the discretion to determine the appropriate information for applications and to define and implement a method for how that information relates to the statutory selection criteria.²⁶ As such, the selection criteria definitions in the NOFO were part of how DOT implemented the statutory selection criteria.

²⁶DOT officials pointed to provisions of the IIJA—codified at 49 U.S.C. § 6702(d)(2) (providing that to be eligible, applicants are to submit to the Secretary an application in such form and containing such information as the Secretary deems appropriate) and 6702(d)(5) (providing that the Secretary is to evaluate each application through a methodology that is discernible and transparent to the public)—as providing the authority to define the statutory criteria set out for the RAISE program.

Evaluating Applications against Each Selection Criterion

DOT designed a method for evaluating applications against each selection criterion.²⁷ The method involved evaluation teams reviewing each application and assigning a rating from “non-responsive” to “high” for each of the eight selection criteria. The RAISE NOFO stated that, during this evaluation, DOT was to consider whether the benefits identified in the application were clear, direct, data-driven, and significant. DOT evaluators were to assign a rating of either non-responsive, low, medium, or high for each selection criterion using the rating definitions included in the NOFO. For example, to receive a high rating, an application would have had to address a criterion as a primary project purpose and significant benefits must accrue in the criterion beyond common practice, according to the NOFO. DOT was to assign a non-responsive rating in a criterion if the application did not contain sufficient information to assess the criterion or if the project negatively affected that criterion.

The RAISE NOFO also contained a table with information on how projects could align with each selection criterion, which DOT referred to as a rating rubric. DOT’s rating rubric included details on how DOT would rate an application for each of the selection criterion. We found that DOT referenced examples related to administration priorities as one way an application could receive a high rating in each criterion.²⁸ Specifically, in each selection criterion, DOT referenced providing significant benefits for underserved, overburdened, or disadvantaged communities as one of several ways applications could receive a high rating. For instance, one of three ways an application could receive a high rating in the safety criterion was by showing the project would reduce fatalities and/or serious injuries for these communities. Similarly, one of eight ways an application could receive a high rating in the environmental sustainability criterion was by showing the project would address the disproportionate negative environmental impacts of transportation on these communities.

²⁷OMB Guidance states that for discretionary federal awards, unless prohibited by federal statute, the federal awarding agency must design and execute a merit review process for applications, with the objective of selecting recipients most likely to be successful in delivering results based on the program objectives. 2 C.F.R. § 200.205.

²⁸According to the rubric, these projects would also have had to demonstrate clear, direct, data-driven, and significant benefits beyond common practice for planning, designing, or building infrastructure to receive a high rating.

DOT officials told us they included these examples in the high rating section in the rubric because they wanted to incentivize applications to consider these priorities in their applications.²⁹ However, DOT officials noted that providing benefits for underserved, overburdened, or disadvantaged communities was one of many ways that applicants could receive a high rating, some of which were unrelated to underserved, overburdened, or disadvantaged communities. For example, a project could have received a high rating in economic competitiveness and opportunity by improving system operations to increase travel time reliability, velocity of goods movement, and multimodal freight mobility.

In fiscal year 2022 DOT assigned ratings to each selection criterion and used a rubric, which some applicants found helpful. DOT officials said they did not assign ratings to individual selection criteria or include a rubric in the RAISE NOFO in recent years. Instead, DOT determined an overall merit rating for an application without assigning a specific rating for each individual selection criterion. DOT officials said they included the rubric in the RAISE NOFO to respond to applicant feedback and improve transparency in how it assigned overall merit ratings, as described below. A few applicants we spoke with told us they found the RAISE NOFO's rubric helpful because it provided examples and specific information on how DOT would rate their application against criteria. One applicant added that they do not often see a rubric with other programs. In general, a large majority of applicants responding to our survey reported that the RAISE NOFO was clearly written and useful for preparing their application. Specifically, an estimated 90 percent of applicants found the language in the RAISE NOFO was either very or moderately clear.³⁰ Additionally, 92 percent of applicants said that the RAISE NOFO was either very or moderately useful for preparing their application.

Assigning an Overall Merit Rating for Each Application

The RAISE NOFO also provided DOT's formula for assigning an overall merit rating for each application based on the individual selection criteria ratings. Overall merit ratings ranged from "unacceptable" to "highly

²⁹DOT officials also told us that the examples in the rubric were not a directive that applicants needed to do a specific activity to score well in the application evaluation process. Further, DOT officials told us they provided applicants with a variety of ways applicants could do well in the evaluation process.

³⁰All survey results in this report are estimates which have been adjusted to account for non-response bias and have a plus or minus 5.31 percentage points or fewer margin of error, unless otherwise noted.

recommended.” The RAISE NOFO stated that applications receiving a high rating in at least five of the eight selection criteria and no non-responsive ratings would receive an overall merit rating of highly recommended. Non-responsive ratings were particularly influential in DOT’s overall merit rating formula. If DOT assigned a non-responsive rating to any of the eight selection criteria, the application could not advance in the application evaluation process. See table 2 for information on the selection criteria ratings needed to achieve each overall merit rating.

Table 2: Overall Merit Ratings for the Fiscal Year 2022 RAISE Grant Program

Overall merit rating	Selection criteria ratings needed to achieve this rating
Highly recommended	High: At least five of the eight selection criteria ratings Non-responsive: Zero of the eight selection criteria ratings
Recommended	High: At least one but no more than four of the eight selection criteria ratings Low: No more than three of the eight selection criteria ratings Non-responsive: Zero of the eight selection criteria ratings
Acceptable	Any combination of selection criteria ratings that does not fit into the definitions of highly recommended, recommended, or unacceptable.
Unacceptable	Non-responsive: Three or more of the eight selection criteria ratings

Source: Fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) notice of funding opportunity. | GAO-24-106280

DOT officials said they introduced the rating method to make the RAISE application evaluation process more transparent. These officials said they wanted applicants to understand how many high ratings they needed to advance in the RAISE application evaluation process. DOT officials also told us the new method made the process more objective for DOT evaluators.

Applicants Generally Found DOT’s Selection Criteria Descriptions Clear

Applicants reported that DOT clearly described the selection criteria in the RAISE NOFO. OMB Guidance requires federal agencies to clearly describe all criteria used to evaluate applications.³¹ According to our survey of fiscal year 2022 RAISE applicants, at least 70 percent of applicants found that DOT clearly described each of the eight selection

³¹App. I to 2 U.S.C. Part 200.

criteria in the NOFO.³² See table 3 for the survey results on applicants' views on the clarity for all eight selection criteria.

Table 3: Applicants' Views on the Clarity of Selection Criteria Descriptions in the Fiscal Year 2022 RAISE Notice of Funding Opportunity

Selection criterion	Estimated percent of applicants reporting the selection criterion was clearly described
Safety	90%
Mobility and community connectivity	86%
Environmental sustainability	85%
Partnership and collaboration	83%
State of good repair	82%
Quality of life	82%
Economic competitiveness and opportunity	82%
Innovation	70%

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: Our survey asked applicants to rate the clarity of each selection criterion description using a scale of very clearly, moderately clearly, slightly clearly, not at all clearly, or don't know. For the purposes of this table, we combined the very clearly and the moderately clearly responses into "clearly."

The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates in this table have a margin of error of 5.31 percentage points or fewer.

Applicants' Top Challenges Included Developing the Benefit-Cost Analysis, but DOT Has Not Fully Addressed This Challenge

Applicants reported various challenges in applying for fiscal year 2022 RAISE funding, including preparing the benefit-cost analysis—which requires applicants to show if a project has greater benefits than costs.³³ Applicants also cited the related challenges of having sufficient staff capacity and expertise to complete a RAISE application. As such, many

³²In our survey we asked respondents to rate how clearly DOT described each selection criterion description using a scale of very clearly, moderately clearly, slightly clearly, not at all clearly, or don't know. For the purposes of this section, we have combined the very clearly and moderately clearly responses into "clearly."

³³DOT used the benefit-cost analysis to implement the statutory requirement for DOT to consider the cost effectiveness of projects.

reported that they relied on consultants for technical assistance with the benefit-cost analysis. While DOT has provided guidance and webinars, it has not reviewed if additional resources for applicants could more fully address applicants' challenges.

Applicants' Most Frequently Cited Challenges Included Developing a Benefit-Cost Analysis, Staff Capacity, and Staff Expertise

Applicants in our survey reported that DOT clearly described the selection criteria in the RAISE NOFO, but they also reported that various aspects of the fiscal year 2022 RAISE application process were challenging. Specifically, 69 percent of capital grant applicants reported developing a benefit-cost analysis was challenging.³⁴ Applicants' next most frequently cited challenges were having sufficient staff capacity (64 percent of all applicants) and staff expertise (53 percent of all applicants).³⁵ Table 4 shows the percentage of applicants that said each identified aspect of the RAISE program was challenging.

Table 4: Applicant Challenges with the Fiscal Year 2022 RAISE Grant Program

Aspects	Estimated percent of applicants who said this aspect was challenging
Developing a benefit-cost analysis (capital grant applicants only)	69%
Having sufficient staff capacity to complete the application	64%
Having sufficient staff expertise to complete the application	53%
Demonstrating outcomes in alignment with selection criteria	51%
Completing the application by the submission deadline	39%
Identifying sources of matching funds	32%

³⁴Only capital grant applications were required to submit a benefit-cost analysis. In our survey, we asked applicants to rate various aspects of the fiscal year 2022 RAISE grant program on a scale of very challenging, moderately challenging, slightly challenging, not at all challenging, or no basis to judge. For the purpose of this section, we combined the very challenging and moderately challenging responses into "challenging."

³⁵Survey results in this report refer to both capital and planning grant applicants unless otherwise noted.

Aspects	Estimated percent of applicants who said this aspect was challenging
Demonstrating benefits for disadvantaged communities	32%
Using grants.gov	27%
Obtaining support letters	15%
Procuring a consultant or contractor to help prepare the application	13%

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimated percent of applicants who said this aspect was challenging includes respondents who reported the aspect was very challenging or moderately challenging.

The estimated percent of applicants for “developing a benefit-cost analysis” includes only applicants who submitted a capital grant application because the U.S. Department of Transportation required only those applicants to submit this analysis.

The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates in this table have a margin of error of 5.31 percentage points or fewer.

Applicants who responded to our survey and organizations we spoke with identified specific challenges related to developing the benefit-cost analysis. For example, one survey respondent told us identifying sources of data to support project benefits is challenging. Other applicants told us they did not have the staff capacity or expertise to complete the benefit-cost analysis. The benefit-cost analysis requirement can also serve as a barrier to potential RAISE applicants. For example, an official from one organization we spoke with said the benefit-cost analysis requirement was part of the reason they did not apply for RAISE funding. This official said that their organization does not have the same staff capacity as urban communities and would have had to hire a consultant to complete the analysis.

Similarly, applicants we spoke with or who responded to our survey also identified specific challenges related to staff capacity and expertise. One applicant we spoke with said the RAISE grant application was complex overall, and they did not have grant or technical writers within their organization to assist with the application. Similarly, a survey respondent said that the RAISE application is very hard for small cities with limited resources. An applicant we spoke with identified staff capacity concerns arising from managing incoming grant funds from the IJA programs and

the American Rescue Plan Act of 2021, which provided funding for a wide range of entities in response to the COVID-19 pandemic.³⁶

To help address these challenges, many applicants reported that they used consultants, particularly for assistance with the benefit-cost analysis.³⁷ In our survey, 61 percent of applicants used a consultant to help prepare at least one of their applications.³⁸ Of those applicants, 92 percent identified needing assistance with conducting the benefit-cost analysis as a reason for using a consultant.³⁹ Applicants we spoke with also told us they hired a consultant, in part, for their expertise with the benefit-cost analysis. For example, one applicant told us the organization hired a consultant because it did not have an economist on staff to complete the benefit-cost analysis. Similarly, many applicants used a consultant to address challenges associated with staff capacity and expertise. (See table 5.)

Table 5: Reasons for Using a Consultant or Contractor to Apply for Fiscal Year 2022 RAISE Funding

Reason	Estimated percent of applicants who said this reason contributed to their decision to use a consultant or contractor
Needed assistance with conducting the benefit-cost analysis	92%
We had an existing relationship with a consultant or contractor	84%
Needed assistance with completing the application(s) by the deadline	75%
Needed assistance with developing information for the selection criteria	74%
Needed assistance with drafting the project narrative (e.g., project description, location, maps, and graphics)	70%

³⁶Pub. L. No. 117-2, 135 Stat. 4. This law provided, among other things, funding to address the continued impact of the COVID-19 pandemic on the economy, public health, state and local governments, individuals, and businesses.

³⁷In our survey we asked applicants about their use of contractors or consultants. For the purposes of this report, we use "consultant" to refer to both contractors and consultants.

³⁸Our survey was specific to fiscal year 2022 RAISE applicants and the results on the use of the consultants cannot be used to generalize other funding years or grant programs.

³⁹This percentage excludes applicants who only submitted an application for a planning project as these applicants were not required to submit a benefit-cost analysis.

Reason	Estimated percent of applicants who said this reason contributed to their decision to use a consultant or contractor
Needed assistance with drafting the environmental risk section (e.g., permitting, National Environmental Policy Act (NEPA), environmental reviews)	66%

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: This survey question was only shown to applicants who responded that they did use a consultant or contractor on a prior question.

The percentage of respondents for "needed assistance with conducting the benefit-cost analysis" excludes respondents who only submitted applications for planning projects, as DOT did not require these applications to include a benefit-cost analysis.

The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates in this table have a margin of error of 5.31 percentage points or fewer.

Organizations incurred a range of costs by using a consultant to prepare applications for fiscal year 2022 RAISE funding. In our survey, 68 percent of applicants using a consultant reported spending more than \$10,000 on a consultant.⁴⁰

DOT Has Not Fully Reviewed How to Address Applicant Challenges with the Benefit-Cost Analysis

DOT has not fully reviewed RAISE's benefit-cost analysis requirement to determine how to best address applicant challenges. OMB Guidance requires federal agencies to periodically review their application evaluation processes.⁴¹ A periodic review can help ensure that evaluation procedures are working as planned and contributing to agency objectives. In addition, *Standards for Internal Control in the Federal Government* states that federal agencies should analyze and respond to risks related to achieving defined objectives.⁴² One of DOT's objectives is to realize the potential of competitive grant programs and DOT authorities to maximize benefits for communities most in need.⁴³ However, applicants may not

⁴⁰This number includes the total expenses for applicants that used a consultant or contractor for one, two, or three applications. See app. II for further information on consultant costs.

⁴¹2 C.F.R. § 200.205.

⁴²GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

⁴³DOT, *Strategic Plan FY 2022-2026*, (Washington, D.C.).

apply for a RAISE grant because they find the benefit-cost analysis challenging. Others may not have the staff expertise or capacity to clearly present the benefits and costs of their project. As a result, DOT risks not receiving applications from communities most in need of a RAISE grant.

DOT officials told us that they have reviewed aspects of DOT's benefit-cost analysis requirements, but we found this has not resulted in improvements that fully addressed challenges applicants reported. Specifically:

- DOT officials told us that they reconsider how they use the benefit-cost analysis each year when they update the *Benefit-Cost Analysis Guidance for Discretionary Grant Programs*, among other things.⁴⁴ Applicants in our survey appreciated this guidance, with 81 percent of capital grant applicants that used the guidance reporting that it was very or moderately useful.⁴⁵ While updating the benefit-cost analysis guidance is an important step to incrementally improve an existing resource, even with this guidance in place, 69 percent of capital grant applicants found the benefit-cost analysis challenging.
- In addition, DOT officials told us they reviewed how they used the benefit-cost analysis in a different discretionary grant program in 2016. Specifically, officials told us they reviewed options for assessing the cost effectiveness of funding requests for the INFRA program and determined the benefit-cost analysis was the best option for doing so.⁴⁶ However, the conclusions drawn from the 2016 review might not

⁴⁴In 2022, the benefit-cost analysis guidance included common data sources, values of key parameters, sample calculations, and additional reference materials for inputs and assumptions. See DOT, *Benefit-Cost Analysis Guidance for Discretionary Grant Programs* (Mar. 2022).

⁴⁵DOT also offered webinars for RAISE applicants on the benefit-cost analysis. While we did not ask specifically about these webinars in our survey, applicants found RAISE webinars in general to be useful. Specifically, 87 percent of applicants that used the webinars found them to be very or moderately useful.

⁴⁶In 2015, the Fixing America's Surface Transportation Act established the Nationally Significant Freight and Highway Projects program (Pub. L. No. 114-94, § 1105(a), 129 Stat. 1312, 1332 (2015)) that DOT referred to as the Fostering Advancements in Shipping and Transportation for the Long-term Achievement of National Efficiencies (FASTLANE) program, which was renamed INFRA in 2017. DOT officials told us they reviewed their options for assessing cost effectiveness for the FASTLANE program in 2016 because FASTLANE's authorizing language required DOT to determine that large projects within the program were cost effective. In this report we refer to all iterations of this program as INFRA, unless otherwise noted.

apply to the current RAISE program because RAISE goals differ from those of the 2016 INFRA program.⁴⁷

By reviewing its benefit-cost analysis process for the RAISE program, DOT has an opportunity to identify additional resources and flexibilities that could further address challenges applicants reported.

- **Reviewing resources.** DOT officials told us that DOT does not have a formal review process to assess or make updates to previously used applicant resources.⁴⁸ A review of applicant challenges with the benefit-cost analysis could look at the resources DOT currently offers to applicants, including tools and technical assistance, and consider how best to build on those resources. Applicants in our survey identified additional resources that they would find useful. One survey respondent told us they would like to see example benefit-cost analyses for applications that received awards in the past. In addition, DOT officials said they have had requests for a calculator to assist with the benefit-cost analysis. Officials told us they plan to provide a template that future applicants can use. A comprehensive review of RAISE's benefit-cost analysis could assess the feasibility of offering these new resources to applicants.
- **Reviewing flexibilities.** A review could also look at how providing flexibility to applicants with the benefit-cost analysis could address challenges. For example, in a grant program known as Promoting Resilient Operations for Transformative, Efficient, and Cost-Saving Transportation (PROTECT), the Federal Highway Administration allowed Tribal governments to submit raw data supporting their need for a project instead of a benefit-cost analysis for applications submitted for the fiscal years 2022 and 2023 program. DOT officials said this is something they could consider for RAISE depending on

⁴⁷RAISE is focused on local and regional assistance for transportation projects and funds a range of project types. The 2016 INFRA program addressed nationally or regionally significant transportation challenges and was designed to fund freight and highway projects. See Pub. L. No. 114-94, § 1105, 129 Stat. 1312, 1332 (2015); 81 Fed. Reg. 76688 (Nov. 3, 2016). See also [GAO-18-38](#). According to DOT officials, the goals of the program are irrelevant to the determination of whether a benefit-cost analysis is the most appropriate way to evaluate cost effectiveness. However, we believe differences in program goals could influence what resources DOT might provide applicants to help ensure that their benefit-cost analyses support program goals.

⁴⁸DOT officials told us they rely on prior experience with the RAISE program and other discretionary grant programs to update applicant resources.

DOT's experience with the flexibilities in the PROTECT program.⁴⁹ DOT could also look at the flexibilities previously offered for the RAISE program. For example, from fiscal years 2013 through 2016, DOT allowed Tribal governments to submit data supporting the need for the project without additional analysis.

By fully reviewing its benefit-cost analysis requirements and applicant resources, DOT will have greater assurance that it is taking sufficient action to address applicant challenges to meet DOT's broader objective of realizing the potential of its competitive grant programs. DOT has begun addressing applicant challenges by annually updating its benefit-cost analysis guidance, which has been well-received by applicants. Building on these actions, including fully considering new resources and potential applicant flexibilities, could help DOT more fully address applicant challenges. This could help applicants more fully assess their projects' benefits and costs and give DOT the information it needs to consider the cost effectiveness of projects in making award decisions.

DOT's Implementation of its Application Evaluation Process Did Not Fully Align with Federal Guidance

We found that DOT's implementation of its process for evaluating RAISE applications did not fully align with federal guidance for ensuring the fairness and transparency of discretionary grant programs. Federal guidance requires that, except where prohibited by federal statute, federal discretionary grant awarding agencies are to execute an application evaluation process to award discretionary grant funding, such as RAISE. DOT guidance also requires DOT to oversee, document, and be transparent about the application evaluation and selection process. DOT established a multiphase process to evaluate 936 applications and select the recipients for over \$2 billion in RAISE funding in less than 4 months.⁵⁰ DOT officials told us that meeting this deadline required significant investments of personnel and time. As previously discussed, we found that DOT designed a method for evaluating applications against statutory

⁴⁹Of the 15 tribal capital grant applicants in our survey who responded to the question, 13 tribal applicants said they found developing a benefit-cost analysis to be very or moderately challenging. These results are not generalizable to all tribal applicants.

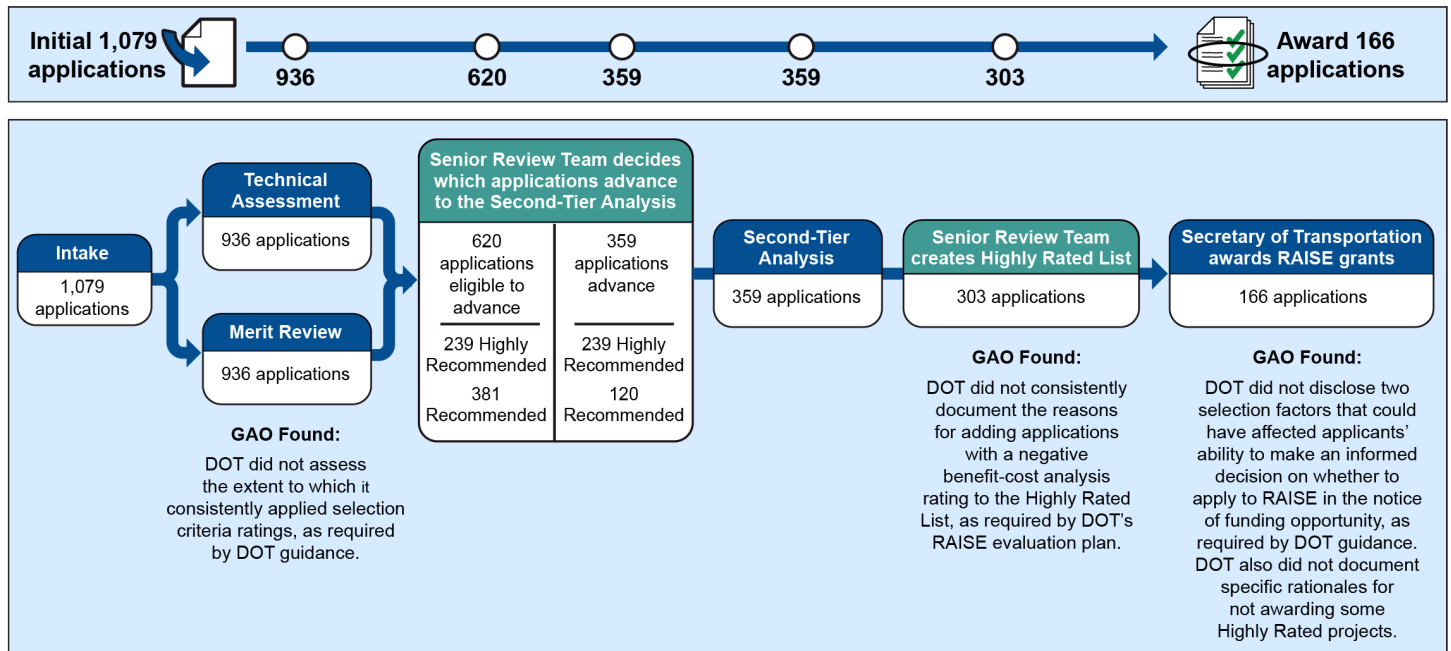
⁵⁰DOT determined that 936 applications were eligible for the fiscal year 2022 RAISE program. When we use "application" in this report, we are referring to applications DOT determined to be eligible, unless otherwise noted.

selection criteria and applicants found this method to be clear. However, we found that in implementing this method and other parts of its application evaluation process, DOT did not fully follow OMB or DOT guidance. Specifically, we found that DOT did not:

- assess the extent to which evaluation teams consistently applied the selection criteria during the merit review phase,
- consistently document decisions to advance applications with expected costs exceeding expected benefits for award consideration, or
- disclose two selection factors or document specific reasons for not awarding some Highly Rated projects.

The above issues occurred at different points in DOT’s application evaluation and selection process. See figure 2 for our analysis of that evaluation process.

Figure 2: Fiscal Year 2022 RAISE Application Evaluation and Selection Process Results and GAO Findings



Source: GAO analysis of U.S. Department of Transportation (DOT) Rebuilding American Infrastructure with Sustainability and Equity (RAISE) evaluation process, data and GAO (icons). | GAO-24-106280

Accessible text for Figure 2: Fiscal Year 2022 RAISE Application Evaluation and Selection Process Results and GAO Findings

- 1) Intake (1,079 applications)
 - a) Technical Assessments (936 applications)
 - b) Merit Review (936 applications)
 - c) GAO Found:
DOT did not assess the extent to which it consistently applied selection criteria ratings, as required by DOT guidance.
- 2) Senior Review Team decides which applications advance to the Second-Tier Analysis
 - a) Technical Assessments.
 - i) 620 applications eligible to advance
(1) 239 Highly Recommended; 381 Recommended
 - b) Merit Review
 - i) 359 applications advance
(1) 239 Highly Recommended; 120 Recommended
- 3) Second-Tier Analysis (359 applications)
- 4) Senior Review Team creates Highly Rated List (303 applications)
GAO Found:
DOT did not consistently document the reasons for adding applications with a negative benefit-cost analysis rating to the Highly Rated List, as required by DOT's RAISE evaluation plan.
- 5) Secretary of Transportation awards RAISE grants (166 applications)
GAO Found:
DOT did not disclose two selection factors that could have affected applicants' ability to make an informed decision on whether to apply to RAISE in the notice of funding opportunity, as required by DOT guidance. DOT also did not document specific rationales for not awarding some Highly Rated projects.

Source: GAO analysis of U.S. Department of Transportation (DOT) Rebuilding American Infrastructure with Sustainability and Equity (RAISE) evaluation process, data and GAO (icons). | GAO-24-106280

Notes: The numbers in this figure following Intake refer to applications that DOT determined to be eligible for the fiscal year 2022 RAISE program. According to DOT data, DOT initially advanced eight applications for reviews that it later determined to be ineligible. These eight applications are not included in the 936 applications in the Technical Assessment and Merit Review or any subsequent numbers in this figure.

Highly Recommended applications automatically advanced to the Second-Tier Analysis.

DOT Did Not Sufficiently Assess if Evaluation Teams Applied Selection Criteria Consistently

We found that DOT did not sufficiently oversee how consistently evaluation teams applied the selection criteria during the merit review phase, as required by federal guidance. Specifically, OMB Guidance and DOT's *Guide to Financial Assistance* require DOT to design and execute an evaluation process for applications.⁵¹ DOT's *Guide to Financial Assistance* provides that this process should include how oversight will ensure a consistent review of applications.

To evaluate applications for RAISE funding, 15 DOT teams assessed applications against the eight selection criteria and assigned an overall rating. DOT assigned applications to teams based on the application's transportation mode (e.g., road, rail, aviation). As a result, the number of applications assigned to each evaluation team ranged from 16 to 78.⁵²

When we asked DOT officials how they oversaw the merit review phase to ensure the 15 teams applied the selection criteria consistently, they said their oversight changed over the evaluation process for fiscal year 2022 RAISE funding.⁵³ Specifically:

- In the first of the four merit review periods for fiscal year 2022 funding, DOT officials said they reviewed the evaluation teams' ratings and narratives.⁵⁴ Specifically, the officials said they reviewed the narratives to ensure they aligned with the overall merit ratings,

⁵¹OMB, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, 2 C.F.R. § 200.205; DOT, *Guide to Financial Assistance*, § 4.5 (October 2019).

⁵²Our analysis of DOT data found the average number of applications assigned per team was about 62 applications, with a median of 61 applications.

⁵³According to the RAISE evaluation plan, the "control and calibration team" was to oversee the merit review phase. The control and calibration team consisted of representatives from the Office of the Secretary.

⁵⁴According to our analysis of DOT data, the first merit review period included about 29 percent of the eligible applications.

focusing on projects with unacceptable or acceptable ratings because those projects could not advance.⁵⁵

- After the first review period, DOT reviewed overall merit ratings for any outliers. Officials explained that this manual review did not identify any outliers during the fiscal year 2022 RAISE application evaluation process.

While DOT conducted some oversight, DOT officials told us they did not assess the distribution of selection criteria ratings across evaluation teams. As a result, DOT may not have reasonable assurance that differences in ratings reflect differences in the quality of applications rather than inconsistencies in how evaluation teams applied ratings. This level of review is known as inter-rater reliability and monitors how raters are interpreting and applying rating standards to ensure consistency.⁵⁶ DOT officials explained it was the responsibility of evaluation team leads to ensure consistency within their team. However, DOT did not have a process to assess selection criteria ratings across evaluation teams.

We found that the selection criteria ratings for the critical non-responsive rating varied by evaluation team. According to the RAISE NOFO, an application that received a single non-responsive rating could not advance in the fiscal year 2022 RAISE application evaluation process. As shown in table 6, the percentage of each team's ratings that were non-responsive varied widely.⁵⁷ For example, we found team 1 and team 5 each reviewed 78 road projects. However, while team 1 assigned 74 non-responsive ratings, team 5 assigned three non-responsive ratings. While such variation does not necessarily mean that DOT applied the selection criteria inconsistently, the variation that we found suggests that DOT could benefit from further investigation into how evaluation teams apply

⁵⁵DOT officials added that the Senior Review Team served as another check on the quality and distribution of ratings as well as a mechanism to advance recommended projects.

⁵⁶One study on grant review found that inter-rater reliability is an important internal control to measure how consistently different raters agree in their decision-making. Deviations between different raters can lead to final scores that lose meaning across raters. See David N. Sattler, Patrick E. McKnight, Linda Naney, Randy Mathis, "Grant Peer Review: Improving Inter-Rater Reliability with Training," *PLoS One*, 10(6), (2015).

⁵⁷DOT officials noted that the variance in ratings across teams is explained, in part, by factors other than DOT's oversight. For example, DOT officials said that the large percentage of non-responsive ratings for team 7 is a result of that team reviewing aviation projects. According to DOT officials, aviation projects were the newest eligible RAISE project type and those applicants had the least experience applying to RAISE. Further, officials said that aviation projects have not rated as well over recent funding rounds.

ratings. For example, our analysis of DOT data found that team 1 assigned non-responsive ratings in all eight selection criteria for seven applications. The DOT evaluator comments for at least three of these applications noted that the applicant did not submit a narrative covering the selection criteria.⁵⁸ This could explain some of this variation in non-responsive ratings between team 1 and team 5 but not all. Furthermore, DOT does not have a process to identify or investigate such rating variations to ensure that evaluation teams are applying ratings consistently.

Table 6: Non-Responsive Ratings the U.S. Department of Transportation Assigned to Fiscal Year 2022 RAISE Applications

Evaluation team (transportation modes evaluated)	Number of applications evaluated	Number of applications receiving at least one non-responsive rating	Number and percentage of each team's ratings that were non-responsive ^a
Team 1 (road)	78	14	74 (12%)
Team 2 (road)	78	9	20 (3%)
Team 3 (road)	76	13	26 (4%)
Team 4 (road)	77	10	43 (7%)
Team 5 (road)	78	3	3 (0%)
Team 6 (road)	78	8	20 (3%)
Team 7 (aviation)	16	7	30 (23%)
Team 8 (bicycle and pedestrian/road)	60	4	27 (6%)
Team 9 (bicycle and pedestrian/road)	61	10	20 (4%)
Team 10 (transit)	61	5	11 (2%)
Team 11 (bicycle and pedestrian/road)	62	6	10 (2%)
Team 12 (bicycle and pedestrian/road)	59	12	30 (6%)
Team 13 (transit)	58	16	32 (7%)
Team 14 (rail)	37	5	15 (5%)
Team 15 (maritime)	57	7	8 (2%)
Total	936	129	369 (5%)

Source: GAO analysis of Rebuilding American Infrastructure with Sustainability and Equity (RAISE) application evaluation process data. | GAO-24-106280

^aPercentages rounded to the nearest percent. The denominator for this column is the total number of selection criteria ratings assigned by each evaluation team.

DOT officials told us they did not assess the distribution of individual selection criteria ratings across teams because of time constraints and because they relied upon the rubric and evaluator training for consistent

⁵⁸We did not review the actual applications and cannot verify whether the applicant submitted a narrative.

guidance for evaluators.⁵⁹ DOT officials said that teams evaluated over 900 applications and each application received eight individual selection criteria ratings, resulting in almost 7,500 individual selection criteria ratings. To meet the IIJA-established statutory award deadline, DOT staggered the merit review phase into four 2-week periods. After the completion of each review period, the Senior Review Team decided which applications to advance to Second-Tier Analysis. Because of this, DOT could not review the distribution of all selection criteria ratings at once. However, even assessing ratings within each review period could have identified potential inconsistencies. For example, our analysis of DOT data found that one team assigned 46 non-responsive ratings in the third review period, representing 45 percent of all non-responsive ratings assigned during that period.⁶⁰

We found that DOT's evaluation plan lacked details that could have facilitated such oversight. The RAISE evaluation plan tasked the control and calibration team with overseeing the quality, consistency, and integrity of the merit review phase. However, the evaluation plan did not provide details on how this oversight would take place. For example, the evaluation plan stated that the control and calibration team was to identify material irregularities or inconsistencies in the evaluation process and refer such a project for re-evaluation. However, the evaluation plan did not define what constituted a material irregularity or inconsistency including specifying how DOT should have identified inconsistencies that warranted action.

By establishing a process to identify potential inconsistencies across evaluation teams in the merit review phase and documenting those steps in the RAISE evaluation plan, DOT will have a mechanism to identify and investigate potential irregularities. Such steps will provide DOT with greater assurance that any variation in evaluation teams' ratings represents differences in application quality rather than an inconsistent application of the merit rating standards.

⁵⁹DOT had less than 4 months to complete the entire application evaluation and selection process. DOT completed the merit review phase in under 2 months.

⁶⁰In the third review period, our analysis of DOT data found, DOT evaluation teams assigned an average of about seven and median of three non-responsive ratings.

DOT Did Not Consistently Document Decisions to Advance Applications with Costs Exceeding Benefits

We found that DOT did not document its reasoning for advancing certain applications to the Highly Rated List, as required by the RAISE evaluation plan. Specifically, the plan stated that applications demonstrating higher costs than benefits (those with a negative benefit-cost analysis) would not advance to the Highly Rated List unless the project demonstrated clear benefits for overburdened, underserved, or historically disadvantaged communities. The evaluation plan further stated that the Senior Review Team should identify and document such reasoning at the time of advancement.

Our analysis of DOT data found that DOT documented a justification within the Senior Review Team meeting notes for advancing 51 applications with a negative benefit-cost analysis rating to the Highly Rated List but did not do so for 24.⁶¹ Thirteen of these 24 applications without a documented justification in the Senior Review Team meeting notes received RAISE awards, totaling over \$200 million. According to the DOT award selection memo, the Senior Review Team determined that these projects had clear outcomes for overburdened, underserved, or historically disadvantaged communities.⁶² However, DOT documented this at the time of award, rather than when DOT advanced the applications after the Senior Review Team decisions, as required by the evaluation plan.

Further, 11 of the 24 advanced projects did not receive awards and thus were not documented in the selection memo. Because of this, DOT does not have a record of why it advanced these 11 applications to the Highly Rated List. DOT officials told us that the Senior Review Team provided the justification for advancing these projects verbally, but staff did not record them in writing. However, verbal justifications do not meet the

⁶¹For one of these 24 projects, DOT documented a justification for advancing the project with a negative benefit-cost analysis rating after DOT publicly announced that the project received an award. According to DOT documentation, this project was incorrectly classified as a planning project. After DOT announced the awards, DOT officials realized that this project was a capital project. DOT then reviewed the project's benefit-cost analysis and assigned a negative benefit-cost analysis rating. In September 2022, 1 month after DOT publicly announced the award, DOT documented the benefits this project provided for overburdened and underserved communities in an email.

⁶²The award selection memo documentation for the previously mentioned project incorrectly classified as a planning project did not include this information.

evaluation plan's documentation requirement, and without documentation the basis for advancing these 11 applications cannot be verified.

When asked about these 24 projects, DOT officials told us the Senior Review Team added the projects after the conclusion of the Senior Review Team meetings and the Highly Rated List provided the documentation required by the evaluation plan. Specifically, they said the Highly Rated List is evidence that the Senior Review Team concluded each of the projects would demonstrate clear benefits for overburdened, underserved, or historically disadvantaged communities. However, the Highly Rated List does not provide information on what benefits these projects provided to overburdened, underserved, or historically disadvantaged communities, as required by the RAISE evaluation plan. In addition, in the absence of other documentation, it is not clear what specifically about the projects merited advancing with a negative benefit-cost analysis rating.⁶³

DOT officials told us that they had a process to verify that DOT documented reasons for advancing projects with a negative benefit-cost analysis rating. DOT officials said they compared the Highly Rated List with Senior Review Team meeting documentation to help ensure that DOT justified advancing applications with a negative benefit-cost analysis rating. However, this process was not sufficient to ensure that DOT documented all of these decisions.

For example, 11 of the 24 advanced projects with a negative benefit-cost analysis rating that did not have a documented justification for advancing were not located in an Area of Persistent Poverty or Historically Disadvantaged Community, based on DOT data. Seven of these applications received awards, totaling over \$127 million. DOT officials told us that a project could demonstrate benefits for overburdened, underserved, or historically disadvantaged communities without being located in one of those communities. For instance, DOT could fund a transit hub located outside of such an area, which could support buses that serve those communities.

However, documenting these justifications is important to help ensure there is a clear rationale for any DOT decisions to advance or fund projects with a negative benefit-cost rating. Our analysis of DOT data

⁶³According to DOT officials, for selected projects, the selection memo identified the benefits of the projects as well as noted the negative benefit-cost analysis rating.

from fiscal years 2018 through 2022 found DOT has consistently awarded projects with a negative benefit-cost analysis.⁶⁴ For example, in fiscal year 2019, DOT awarded over half of the capital grant awards to applications with a negative benefit-cost analysis rating. These awards totaled over \$500 million. More recently, in fiscal year 2022, DOT awarded approximately \$681 million to 39 applications with expected costs exceeding expected benefits.⁶⁵ See table 7.

Table 7: RAISE Applications and Awards with a Negative Benefit-Cost Analysis Rating, Fiscal Years 2018-2022

Fiscal year	Number of applications with a negative benefit-cost analysis rating	Number of capital grant applications with a negative benefit-cost analysis rating awarded funding	Percentage of capital grants awarded to applications with a negative benefit-cost analysis rating	Total funding awarded to capital grant applications with a negative benefit-cost analysis rating
2018	120	25	27%	\$349,186,195
2019	103	31	56%	\$531,778,383
2020	94	15	26%	\$255,656,299
2021	105	22	35%	\$336,133,949
2022	116	39	32%	\$680,993,953

Source: GAO analysis of Rebuilding American Infrastructure with Sustainability and Equity (RAISE) data. | GAO-24-106280

Notes: RAISE was known as Better Utilizing Investments to Leverage Development from fiscal years 2018 through 2020.

From fiscal years 2018 through 2021, the U.S. Department of Transportation (DOT) assigned capital grant applications a rating based on the estimated benefit-cost ratio (BCR). DOT could assign an application a rating of BCR > 3.0, BCR 1.5-3.0, BCR 1.0-1.5, or BCR < 1.0. DOT also assigned a confidence level for the BCR of low, medium, or high. From fiscal years 2018 through 2020, DOT also assigned a rating for the net benefits of the benefit-cost analysis. For the purpose of this table, we consider applications rated BCR < 1.0 to have received a negative benefit-cost analysis rating.

When asked about their view on DOT advancing and awarding applications with a negative benefit-cost analysis rating, one senior DOT official involved in the benefit-cost analysis review told us it can be appropriate for DOT to reach a different conclusion than an applicant’s benefit-cost analysis results indicate. The official added that economic efficiency is not the only outcome the RAISE program aims to achieve.

⁶⁴From fiscal years 2018 through 2021, DOT assigned capital grant applications a rating based on the estimated benefit-cost ratio (BCR). DOT could assign an application a rating of BCR > 3.0, BCR 1.5-3.0, BCR 1.0-1.5, or BCR < 1.0. DOT also assigned a confidence level for the BCR rating of low, medium, or high. Additionally, from fiscal years 2018 through 2020, DOT assigned a rating for the net benefits of the benefit-cost analysis. For the purpose of this report, we consider applications rated BCR < 1.0 to have received a negative benefit-cost analysis rating.

⁶⁵Our analysis of DOT data found that these 39 projects were mostly road projects (20) and/or projects in rural areas (24).

However, ensuring that DOT documents justifications for advancing applications is important for demonstrating that DOT implemented a transparent and fair evaluation process for awarding fiscal year 2022 RAISE funding. For example, for one project with a negative benefit-cost analysis rating that advanced, DOT's documentation identified that the project would connect a local disadvantaged community with high-speed rail transportation. It also discussed the efforts to engage with and achieve employment targets for individuals who reside in disadvantaged areas. Documentation such as this provides insight into DOT's decision-making process and lays out what DOT considered clear benefits for disadvantaged communities. By documenting a justification for advancing all projects with a negative benefit-cost analysis rating to the Highly Rated List, DOT would be better able to demonstrate that these projects provided clear benefits for overburdened, underserved, or historically disadvantaged communities that outweigh the negative benefit-cost analysis rating.

DOT Did Not Disclose All Factors Used in the Selection Process, or Document a Specific Rationale for Not Awarding Grants to Some Highly Rated Projects

Our review of DOT documentation found that DOT did not disclose all selection factors to applicants in the NOFO or document specific rationales for not awarding some projects, as required by federal guidance. Specifically, OMB Guidance requires federal agencies to list any program policy or other factors, other than the merit criteria, that the agency may use in selecting applications (such as geographical dispersion) in the NOFO.⁶⁶ Additionally, DOT's *Guide to Financial Assistance* requires DOT to develop details of the process that may impact an applicant's ability to make informed decisions and affect the fairness of the process prior to issuing the NOFO, and to include those details in the NOFO. It also requires DOT to disclose program policy factors (such as geographic dispersion) used during the selection process in an objective and clear way in the NOFO and evaluation plan and document how it evaluated those factors. Finally, the Guide requires DOT to document an explanation of why non-awarded projects did not receive an award.

⁶⁶OMB, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, App. I to 2 C.F.R. Part 200, section E.

Disclosing Selection Factors

We found that DOT did not fully describe how it would determine which Highly Rated projects received awards because it did not disclose two selection factors in the RAISE NOFO or evaluation plan. As a result, applicants did not have complete information on the details of DOT's selection process that may have been useful to applicants in developing their applications.

Specifically, our review of DOT documentation found that DOT established a new process in fiscal year 2022.

- DOT provided the Secretary with the full Highly Rated List of 303 projects to make selection decisions, according to DOT officials. According to DOT officials, the Secretary could select any project from the Highly Rated List for award.
- DOT officials created a list of 184 projects within the Highly Rated List. DOT called this list of 184 projects the "selection portfolio," and DOT officials told us that they provided this list to the Secretary as a subset of the Highly Rated List.⁶⁷
- The Secretary then selected 166 projects to receive awards from the selection portfolio of 184 projects. The Secretary did not select any projects outside of the selection portfolio for award.

Our review of DOT documentation found that DOT did not include all of the factors it used to create the selection portfolio in the NOFO and evaluation plan. Specifically, DOT did not tell applicants that it sought to:

- make at least one award to each state or territory that applied for a RAISE award, or
- minimize the number of applications receiving an award amount smaller than their funding request.

DOT officials provided two reasons why DOT did not include these factors in the NOFO or evaluation plan:

- First, DOT officials told us that DOT leadership created the selection portfolio process after DOT issued the NOFO. Because of this, they could not have included the selection factors in the NOFO. However, in situations like this, DOT's *Guide to Financial Assistance* requires

⁶⁷A DOT official told us that they used a selection portfolio again in fiscal year 2023.

DOT to “provide that information to the applicant to permit changes to be made before the NOFO deadline.” In instances where DOT alters the process after the application deadline, DOT’s *Guide to Financial Assistance* requires DOT to “inform the applicant and provide adequate time for the applicant to make the requisite changes.”

- Second, DOT officials said they could not have included the state or territory selection factor in the NOFO because they did not know if they would receive competitive applications from every state. However, DOT’s *Guide to Financial Assistance* requires programs to consider situations like this when creating the NOFO and evaluation plan. Specifically, the Guide says, “prior planning of the merit review process should account for unexpected changes to the number and type of applications.” DOT could have addressed this uncertainty by clarifying in the NOFO that its goal of awarding one grant to each state or territory was dependent on the quality of applications it received.

In addition, DOT officials told us that awarding at least one grant to each state or territory that applied was how it met the statutory geographic diversity requirement. However, DOT guidance requires DOT to disclose policy factors used during the selection process in an objective and clear way. While DOT’s NOFO informed applicants that the Secretary would select projects for award consistent with statutory requirements for geographic diversity, it did not inform applicants of how DOT would implement the geographic diversity requirement. Knowing that DOT will consider geographic diversity differs from knowing that DOT established a goal of awarding one grant to each state or territory. The latter provides applicants with clear and objective information that they can use to assess their odds of receiving an award and factor into their application decision.

If DOT had disclosed more information in the NOFO on how it would decide which Highly Rated applications received awards, applicants could have been better positioned to make more informed decisions on whether to apply. For example, they would have been provided with the information that they were primarily competing against other Highly Rated applications in their own state, rather than competing against applicants

across the country.⁶⁸ We spoke with an official of one entity that considered applying in 2022 but did not ultimately apply, in part, because RAISE award statistics showed that only a small percentage of RAISE applicants nationwide receive an award. In 2022, using DOT's selection factor of awarding at least one grant to each state, this entity may have been primarily competing against only one or two other applicants in their state for an award.⁶⁹ While this official told us they believed they had a 10 percent chance of receiving a grant, their odds may have been significantly better.

Documenting a Specific Rationale for Non-Awarded Projects

DOT officials told us that they used the selection portfolio process to document why DOT did not award grants to certain Highly Rated projects. However, we found that the portfolio did not sufficiently document a specific explanation of why DOT did not select most of the non-awarded projects for an award, as required by DOT's *Guide to Financial Assistance*.⁷⁰ Of 303 Highly Rated projects, DOT:

- selected 166 for award and documented those decisions in a selection memo,
- did not select 137 for award, and
 - nine of these projects were included in the selection portfolio and had a specific rationale for not being selected for an award.⁷¹

⁶⁸According to DOT officials, the RAISE grant program is a national competition. In fiscal year 2022, the Secretary chose to maximize geographic diversity by awarding one grant to a project in each state. However, the Secretary also had to meet statutory requirements such as awarding funds evenly to urban and rural projects and taking into consideration modal diversity. DOT officials said these statutory requirements cannot be met on a state-by-state basis.

⁶⁹Our analysis of DOT data found that, in fiscal year 2022, 12 states or territories had five or fewer eligible applications. Further, DOT did not receive any eligible applications from one territory. In addition, 35 states or territories with applicants that submitted an eligible application had five or fewer applications on the Highly Rated List. Of these, seven states or territories had one application on the Highly Rated List.

⁷⁰The RAISE evaluation plan also required DOT to document the basis upon which it did not select applications for award.

⁷¹For one of these nine projects, DOT identified that other projects in the same state had higher individual selection criteria ratings as the rationale for not selecting that project. For other projects DOT provided a specific rationale for, DOT cited the need to achieve modal or geographic diversity as a determining factor for not selecting the project.

- 128 of these projects lacked a specific rationale as to why they were not selected for award. Of these projects, 119 were left out of the selection portfolio and nine were included in the selection portfolio. For the 119 projects, DOT documented the same rationale for not including the project in the selection portfolio, and thus not selecting the project for an award.⁷² For the other nine projects, DOT documented the same rationale for each non-awarded project that generally described DOT's approach to the selection process.⁷³

DOT's documentation for these 128 non-awarded Highly Rated projects has several weaknesses:

- **Documentation does not address individual project shortcomings.** First, it specified reasons a project would be selected, rather than documenting the specific shortcomings of the project or other reasons for not being selected. In addition, generally describing the reasons a project would be selected does not meet the DOT *Guide to Financial Assistance* requirement for DOT to document how it evaluated those factors. For example, saying that DOT set out to achieve geographic diversity is different from identifying that the reason an individual project was not selected was because other projects in the same state were selected. The former details the criteria used while the latter shows how DOT applied that criteria.
- **Documentation not focused on award decisions.** Second, the documentation for the 119 projects DOT left out of the selection

⁷²This rationale stated that DOT officials "...developed a selection portfolio to provide the Secretary a set of projects that met the statutory requirements, Administration policy priorities, achieved geographic and modal diversity, and minimized the number of projects that would receive a haircut to their RAISE grant funding request. Relevant Administration priorities include, among other items, the priority, consistent with Executive Order 14008, to ensure that benefits of Federal financial assistance flow to disadvantaged communities. In the interest of geographic diversity, the Department sought to make at least one award to each State or territory that applied for a RAISE award. This project was not included in the selection portfolio." DOT officials said that the purpose of the selection portfolio was to document rationales for not selecting projects in an efficient manner.

⁷³The rationale for these 9 projects stated, "In selecting projects for award, the Department set out to achieve both geographic and modal diversity, prioritizing projects with the highest priority merit criteria ratings including Safety, Environmental Sustainability, Mobility and Community Connectivity (which encompasses supply chain improvements), and Quality of Life as well as to minimize haircuts to RAISE funding requests, all balanced with meeting statutory requirements for planning grants, awarding funding evenly between projects located in urban and rural areas as well as meeting minimum funding requirements for projects located within areas of persistent poverty or historically disadvantaged communities. This project did not meet these parameters for award."

portfolio simply stated that a specific project was not included in the portfolio but did not explicitly provide the rationale for why DOT did not award these projects. Such a distinction is important because neither DOT's NOFO nor its evaluation plan indicate that only projects included in the selection portfolio would be considered for awards.⁷⁴

- **Documentation not clear on what criteria DOT applied.** Finally, DOT's documentation did not detail which of the specific priorities of the administration that the project did not meet to be included in the selection portfolio. Specifically, DOT's rationale indicates that DOT sought to ensure that benefits of federal financial assistance flow to disadvantaged communities, among other priorities. However, DOT's documentation of its selection portfolio decisions does not say what those other priorities were. DOT officials told us that they were referring to the priorities outlined in the NOFO. However, without documentation of how DOT applied the stated criteria to each project, which criteria (including administration priorities) DOT used to eliminate individual projects from award consideration cannot be verified.

DOT officials told us that they thought the description of the selection portfolio together with the statement that the project was not in the selection portfolio was sufficient for documenting rationales for not awarding projects. However, without providing a documented rationale noting the specific reasons why DOT did not select Highly Rated applications for an award, applicants may continue to lack insight into DOT's decision-making. In our survey, 43 percent of applicants were either slightly or not at all clear on why DOT did not select their project for funding. By documenting the specific rationales for not awarding grants to all Highly Rated projects, DOT could provide applicants with more specific information on why their projects were not awarded. Such information could help applicants improve their projects for future funding rounds and give applicants greater confidence that DOT is implementing a fair and transparent program.⁷⁵

⁷⁴In response to this, DOT officials told us that all projects on the Highly Rated List could be selected for award. Because of this, it is important for DOT to provide a rationale for why projects were not selected for award in addition to why they were not included in the selection portfolio.

⁷⁵According to DOT officials, the RAISE program has been and continues to be oversubscribed. These officials said that the 303 Highly Rated projects in fiscal year 2022 requested approximately \$4 billion. DOT awarded about \$2.25 billion.

Conclusions

The RAISE program is a significant funding source for improving regional and local surface transportation infrastructure throughout the United States. Accordingly, DOT is responsible for ensuring that the RAISE application and evaluation processes promote equitable access for entities eligible for this funding—such as Tribal, state, and local governments. For DOT to meet its objective of realizing the potential of competitive grant programs to maximize benefits for communities most in need, DOT should further address some of the challenges cited by applicants to the fiscal year 2022 RAISE program. Taking steps to review its benefit-cost analysis requirements—such as providing applicants with additional resources, flexibilities, or other tools—could help applicants more fully assess their projects’ benefits and costs and give DOT the information it needs to consider the cost effectiveness of projects when making award decisions.

Further, DOT has a responsibility to evaluate applications in a transparent manner that demonstrates it is awarding RAISE grants in a fair manner. As DOT administers the remaining \$4.5 billion in RAISE funding from the IIJA, taking action to (1) oversee the merit review process, (2) ensure that it fully documents key decisions, and (3) fully discloses important information to applicants in the NOFO could help DOT better demonstrate that it is implementing a fair and transparent process. Specifically, taking steps to close the gaps we identified could help ensure that DOT reviews applications consistently, has the information it needs to explain its decisions to external parties, and provides all applicants with the information they need to best position themselves to succeed in future funding rounds.

Recommendations for Executive Action

We are making the following five recommendations to DOT:

The Secretary of Transportation should review what additional resources and flexibilities would best address challenges applicants face developing a benefit-cost analysis and take steps to implement them.
(Recommendation 1)

The Secretary of Transportation should ensure RAISE officials implement oversight steps to assess the consistency of ratings across evaluation

teams in the merit review phase and document these steps in the RAISE evaluation plan. (Recommendation 2)

The Secretary of Transportation should ensure RAISE officials develop an enhanced process to verify that DOT documents all decisions to include projects with a negative benefit-cost analysis rating on the Highly Rated List prior to sending the Highly Rated List to the Secretary of Transportation. (Recommendation 3)

The Secretary of Transportation should ensure that the RAISE NOFO identifies all selection factors, such as those used when creating a selection portfolio or other process to facilitate award decisions. (Recommendation 4)

The Secretary of Transportation should ensure that RAISE officials document a specific rationale explaining why all non-awarded Highly Rated projects were not selected for an award. (Recommendation 5)

Agency Comments and Our Evaluation

We provided a draft of this report to DOT for review and comment. In its comments, reproduced in appendix IV, DOT concurred with recommendations 1 through 3, related to addressing applicant challenges with developing benefit-cost analyses, and enhancing oversight and documentation of the application evaluation process.

DOT also concurred with recommendation 4, related to identifying all selection factors, with clarification. Specifically, DOT stated that it sufficiently notified potential applicants that geographic diversity would be a selection factor through its statement in the NOFO that "the Secretary selects projects from the Highly Rated List for award, consistent with the selection criteria and statutory requirements for geographic and modal diversity." However, as stated in our report, DOT guidance requires DOT to disclose policy factors used during the selection process in an objective and clear way. While DOT's NOFO informed applicants that award selections would be consistent with statutory requirements for geographic diversity, it did not inform applicants of how DOT would implement the geographic diversity requirement. We maintain that knowing that DOT established a goal of awarding one grant to each state or territory would have provided applicants with clear and objective information that they can use to assess their odds of receiving an award and factor into their application decision. As such, we believe that DOT should fully implement

our recommendation to ensure that the RAISE NOFO identifies all selection factors used to assist the Secretary in making award decisions.

In addition, DOT stated that it does not agree with the report's characterization of the selection portfolio. In particular, DOT stated that the selection portfolio is used solely to facilitate documenting Highly Rated projects not selected for award. We believe that our report accurately describes DOT's selection portfolio. Specifically, our report recognizes that DOT officials told us that they used the selection portfolio process to document why DOT did not award grants to certain Highly Rated projects. Our report also states that the selection portfolio is a list of 184 projects within the Highly Rated List of 303 projects, and that DOT officials told us that they provided the selection portfolio to the Secretary as a subset of the Highly Rated List. DOT officials said that the Secretary could select any Highly Rated project for award. As such, projects that were not included in the selection portfolio were not eliminated from award consideration. Our report notes that the Secretary selected 166 projects to receive awards, all of which were included on the selection portfolio.

In addition, DOT did not concur with recommendation 5, that DOT document a specific rationale explaining why all non-awarded Highly Rated projects were not selected for an award. DOT stated in its letter that the selection portfolio process adequately documents why it did not select projects and that no further documentation is necessary. We disagree for the reasons outlined in our report. Specifically, the selection portfolio did not provide specific rationales for not awarding projects, as required by DOT guidance. In addition, while the selection portfolio stated that a project was not included in the portfolio, it did not explicitly provide the rationale for why DOT did not award these projects. We continue to believe that documenting specific rationales for not selecting projects would provide a clearer picture of how DOT makes award decisions, and that DOT should fully implement our recommendation.

We are sending copies of this report to interested congressional committees, the Secretary of Transportation, and other interested parties. In addition, this report is available at no charge on the GAO website at <https://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-2834 or RepkoE@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 key contributions to this report are listed in appendix V.

A handwritten signature in black ink, reading "Elizabeth Repko", followed by a long horizontal line extending to the right.

Elizabeth Repko
Director, Physical Infrastructure Issues

Appendix I: Objectives, Scope, and Methodology

The Infrastructure Investment and Jobs Act (IIJA) includes a provision for GAO to examine the U.S. Department of Transportation's (DOT) administration of the Rebuilding American Infrastructure with Sustainability and Equity (RAISE) grant program.¹ In this report, for fiscal year 2022 RAISE funding, we (1) describe the method DOT designed to rate applications using the statutory selection criteria and applicants' views on the clarity of this method (2) identify challenges applicants reported experiencing when applying to RAISE and examine how DOT has addressed these challenges, and (3) assess the extent to which DOT's implementation of its application evaluation process aligned with federal guidance.

For all objectives, we reviewed relevant laws and DOT notices of funding opportunity (NOFOs). In addition, we interviewed DOT officials to understand how they administered the fiscal year 2022 RAISE program.

To describe the method DOT designed to rate applications using the statutory selection criteria, we reviewed documentation such as DOT's internal RAISE evaluation plan. To describe applicant's views on the clarity of this method, we conducted a generalizable survey of eligible fiscal year 2022 RAISE applicants. In this survey, we asked applicants about their views on the clarity of DOT's selection criteria descriptions, clarity and usefulness of the RAISE NOFO, and transparency of DOT's application evaluation process, among other things. We surveyed 842 applicants and received 562 responses to our survey, for a response rate of 67 percent.²

To identify the challenges applicants reported experiencing and examine how DOT has addressed these challenges, we surveyed fiscal year 2022 RAISE applicants. The survey asked about challenges applicants experienced applying for fiscal year 2022 RAISE funding as well as their views on DOT resources, among other things. We also reviewed

¹Pub. L. No. 117-58, § 21202(a), 135 Stat. 429, 675 (2021) (codified as amended at 49 U.S.C. § 6702(k)(2)).

²See app. II for additional details about how we conducted our survey and the survey results.

resources that DOT provided to applicants during the fiscal year 2022 RAISE program such as webinars and frequently asked questions. In addition, to develop appropriate survey questions, we interviewed a non-generalizable sample of five organizations that applied for fiscal year 2022 RAISE funding. We selected applicants to interview based on factors including whether they received a fiscal year 2022 RAISE grant, organization type (state government, city government, etc.), project type (road, transit, etc.), and project location (urban, rural, Area of Persistent Poverty, etc.).³ Further, to understand the perspective of organizations that considered applying to RAISE but did not ultimately apply, we interviewed a non-generalizable selection of individuals who attended a RAISE webinar but did not apply for fiscal year 2022 funding.⁴ We selected these individuals based on their organization type, region (e.g., West, Midwest, South), and whether the individual's organization had previously applied for RAISE funding.

To assess the extent to which DOT's implementation of its application evaluation process aligned with federal guidance, we analyzed fiscal year 2022 RAISE grant application evaluation and award data.⁵ In addition, we assessed DOT's application evaluation process data for fiscal years 2018 through 2022 to understand how DOT uses the results of the benefit-cost analysis. We also reviewed application evaluation process documentation such as the minutes from Senior Review Team meetings. We compared information from RAISE grant application evaluation and

³The IJJA defined Areas of Persistent Poverty as:

“(A) any county (or equivalent jurisdiction) in which, during the 30-year period ending on the date of enactment of this chapter, 20 percent or more of the population continually lived in poverty, as measured by—

(i) the 1990 decennial census;

(ii) the 2000 decennial census; and

(iii) the most recent annual small area income and poverty estimate of the Bureau of the Census;

(B) any census tract with a poverty rate of not less than 20 percent, as measured by the 5-year data series available from the American Community Survey of the Bureau of the Census for the period of 2014 through 2018; and

(C) any territory or possession of the United States.”

⁴These individuals represented four organizations.

⁵RAISE grant application evaluation and award data included information on the characteristics of the project, ratings assigned by DOT, whether DOT awarded the project funding, and how much funding DOT awarded.

award data and DOT documentation against federal requirements for discretionary grant programs.⁶ These requirements are contained in federal guidance including the Office of Management and Budget's *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (OMB Guidance) and DOT's *Guide to Financial Assistance*.⁷ This guidance collectively establishes requirements for discretionary grant programs including requirements related to fairness and transparency.

To assess the reliability of DOT data we reviewed DOT documentation, conducted logic tests on the data, and traced key information back to source documents. We also reviewed a previous GAO data reliability assessment of RAISE application evaluation process data. In addition, we asked knowledgeable DOT officials about the reliability of the data. We determined that this data was sufficiently reliable for our purposes of understanding DOT's application evaluation process and describing the distribution of RAISE funding.

We conducted this performance audit from October 2022 to November 2023 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 obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

⁶We did not review individual applications to verify that DOT accurately applied the selection criteria.

⁷2 C.F.R. Part 200, and App. I to Part 200. DOT's *Guide to Financial Assistance* incorporates the OMB Guidance requirements.

Appendix II: GAO Survey of Fiscal Year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) Applicants

Survey Development

To obtain applicants' perspectives on the U.S. Department of Transportation's (DOT) RAISE grant application solicitation, evaluation, and award process, we developed and conducted a web-based survey. We distributed our survey to entities that applied for fiscal year 2022 RAISE funding, providing each entity a unique survey link to a GAO-operated website.¹ We conducted our survey from March to May 2023. We asked each applicant about their experiences with the fiscal year 2022 RAISE notice of funding opportunity and other DOT provided resources; using a contractor or consultant to assist with the application; DOT's application evaluation and award process; as well as challenges applicants experienced applying for fiscal year 2022 RAISE funding, among other topics.² We asked applicants additional questions depending on whether DOT selected their application for funding.³

To develop the survey, we spoke with 12 organizations that applied for fiscal year 2022 RAISE funding. We first interviewed five of these 12 organizations to determine the scope of our survey questions. We selected applicants for the scoping interviews according to applicant

¹GAO used the Federal Risk and Authorization Management Program compliant Qualtrics web-based survey tool to administer the survey.

²Prior to sending out the survey, we asked applicants to identify an alternative contact if they were not the most appropriate contact for their application. In some cases, applicants may have identified or forwarded the survey to be completed by entities such as consultants or partner organizations on their application.

³Applicants could submit up to three applications for fiscal year 2022 RAISE funding. In cases where DOT selected at least one of these applications for funding but did not select another, the applicant received the questions for both scenarios.

types (port authorities, state governments, etc.), grant types (i.e., capital or planning), and project types (maritime, road, etc.) as well as award status (awarded or non-awarded), and number of applications, among other characteristics. After we drafted and reviewed the initial survey instrument, we pre-tested the instrument via web calls with an additional seven organizations to help ensure questions were clear, answer choices were appropriate, and the survey was not burdensome. We revised the survey as appropriate following the pre-tests. We selected applicants for pre-testing according to a variety of characteristics similar to the applicants we selected for scoping interviews. To incorporate considerations related to project size, we also pre-tested the survey with applicants requesting a range of funding amounts.

Following the distribution of the survey on March 23, 2023, we emailed applicants reminders about completing the survey and called some applicants directly to confirm they had received the email with the survey link. We closed the survey on May 8, 2023.

Our survey was a census of all eligible fiscal year 2022 RAISE grant applicants.⁴ We received 562 responses from 842 eligible applicants surveyed, for a response rate of 67 percent.⁵ In order to analyze potential non-response bias, we used logistic regression models on our survey data to look for correlation with the propensity to respond among available applicant-related and application-related variables. We found that the propensity to respond was correlated with applicants that were awarded a fiscal year 2022 RAISE grant, rail project applicants, and applicants that DOT found had limited experience delivering federally funded transportation projects. We used the inverse of the predicted propensity to respond from a logistic regression model with these variables to create sample weights that adjust for non-response bias. With these sample weights adjusted for nonresponse bias, the results of

⁴We identified eligible fiscal year 2022 RAISE applicants using application data from DOT, where DOT had determined the eligibility of applicants.

⁵In two instances, a respondent submitted multiple responses. In one case, the respondent was the point of contact for one application and completed an additional survey on behalf of another applicant in their organization. In the other case, the respondent submitted responses on behalf of two different applicants. In each case, the respondents were prompted with the information specific to the individual applications. The number of eligible applicants surveyed is less than the 936 eligible applications because some applicants submitted more than one eligible application.

the survey are generalizable to all eligible fiscal year 2022 RAISE applicants unless otherwise noted.

Survey Results

Tables 8 through 38 provide questions from the survey and responses to the survey’s individual questions. Not all respondents answered each question. In some cases, based on survey design and responses provided, some questions were not applicable to certain respondents. Applicants may also have chosen not to answer some questions. Survey results have been adjusted to account for non-response bias found through a non-response bias analysis.

Notice of Funding Opportunity Questions

Table 8: Did you use the FY 2022 RAISE Notice of Funding Opportunity to prepare your FY 2022 RAISE application(s)?

Response	Estimated percent of applicants
Yes	96%
No	-
Don't know	-

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates in this table have a margin of error of 5.31 percentage points or fewer.

Cells marked “-” had fewer than 20 responses and are not reported in this table.

If applicants answered “yes” to the above question, then the survey asked the following three questions (see tables 9 – 11):

Table 9: How clear was the language in the FY 2022 RAISE Notice of Funding Opportunity?

Response	Estimated percent of applicants
Very clear	32%
Moderately clear	58%
Slightly clear	8%
Not at all clear	-
No opinion / no basis to judge	-

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

**Appendix II: GAO Survey of Fiscal Year 2022
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All estimates in this table have a margin of error of 5.31 percentage points or fewer.
Cells marked “-” had fewer than 20 responses and are not reported in this table.

Table 10: How useful did you find the FY 2022 RAISE Notice of Funding Opportunity in preparing your FY 2022 RAISE application(s)?

Response	Estimated percent of applicants
Very useful	49%
Moderately useful	43%
Slightly useful	6%
Not at all useful	-
No opinion / no basis to judge	-

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates in this table have a margin of error of 5.31 percentage points or fewer.
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Table 11: How clearly did the U.S. Department of Transportation describe each selection criterion in the FY 2022 RAISE Notice of Funding Opportunity?

Selection Criteria	Estimated percent of applicants				
	Very clearly	Moderately clearly	Slightly clearly	Not at all clearly	Don't know
Safety	51%	39%	6%	-	-
Environmental sustainability	39%	46%	10%	-	-
Quality of life	38%	44%	14%	-	-
Mobility and community connectivity	40%	46%	10%	-	-
Economic competitiveness and opportunity	37%	45%	13%	-	-
State of good repair	40%	42%	12%	-	-
Partnership and collaboration	43%	40%	12%	-	-
Innovation	28%	43%	21%	6%	-

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates in this table have a margin of error of 5.31 percentage points or fewer.
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Resources Questions

Table 12: Did you use the following resources in preparing your RAISE grant application(s)?

Resource	Estimated percent of applicants		
	Yes	No	Don't know
RAISE webinars	84%	13%	-
RAISE Frequently Asked Questions	84%	12%	5%
U.S. Department of Transportation (DOT) Benefit-Cost Analysis Guidance for Discretionary Grant Programs	75%	14%	11%
U.S. DOT Project Readiness Guidance for Applicants, located on the U.S. DOT website	49%	35%	16%
U.S. DOT "How to Apply" Information, located on the U.S. DOT website	67%	24%	9%
RAISE grants email inbox for applicant questions	33%	55%	12%

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates in this table have a margin of error of 5.31 percentage points or fewer.

Cells marked "-" had fewer than 20 responses and are not reported in this table.

For "U.S. DOT Benefit-Cost Analysis Guidance for Discretionary Grant Programs," we only included responses from applicants who applied for a capital project, as DOT only required these applicants to submit a benefit-cost analysis.

If applicants answered "yes" to the questions in the above table, then the survey asked the questions in table 13:

Table 13: How useful were the following resources in preparing your RAISE grant application(s)?

Resource	Estimated percent of applicants				
	Very useful	Moderately useful	Slightly useful	Not at all useful	No opinion / no basis to judge
RAISE webinars	42%	45%	12%	-	-
RAISE Frequently Asked Questions	42%	44%	11%	-	-
U.S. Department of Transportation (DOT) Benefit-Cost Analysis Guidance for Discretionary Grant Programs	45%	37%	13%	-	-
U.S. DOT Project Readiness Guidance for Applicants, located on the U.S. DOT website	-	-	12%	-	-
U.S. DOT "How to Apply" Information, located on the U.S. DOT website	35%	45%	13%	-	7%
RAISE grants email inbox for applicant questions	-	-	-	-	-

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimates are weighted to account for non-response bias and rounded to the nearest percent.

**Appendix II: GAO Survey of Fiscal Year 2022
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All estimates in this table have a margin of error of 5.31 percentage points or fewer.

Cells marked “-” had fewer than 20 responses or had a margin of error that was too large for us to report in this table.

For “U.S. DOT Benefit-Cost Analysis Guidance for Discretionary Grant Programs,” we only included responses from applicants who applied for a capital project, as DOT only required these applicants to submit a benefit-cost analysis.

Project Location Questions

Table 14: Did you use the following tools in preparing your FY 2022 RAISE grant application(s)? U.S. Department of Transportation (DOT) tools to identify whether your project was located in an urban area (the Census Bureau maps and/or the list of Urbanized Areas on the U.S. DOT website)

Response	Estimated percent of applicants
Yes	79%
No	13%
Don't know	8%

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates in this table have a margin of error of 5.31 percentage points or fewer.

If applicants answered “yes” to the above question, then the survey asked the following question:

Table 15: How useful were the following tools in preparing your FY 2022 RAISE grant application(s)? U.S. Department of Transportation (DOT) tools to identify whether your project was located in an urban area (the Census Bureau maps and/or the list of Urbanized Areas on the U.S. DOT website)

Response	Estimated percent of applicants
Very useful	64%
Moderately useful	24%
Slightly useful	8%
Not at all useful	-
No opinion / No basis to judge	-

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates in this table have a margin of error of 5.31 percentage points or fewer.

Cells marked “-” had fewer than 20 responses and are not reported in this table.

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Table 16: Did you use the following tools in preparing your FY 2022 RAISE grant application(s)? U.S. DOT tools to identify whether your project was located in an Area of Persistent Poverty and/or a Historically Disadvantaged Community (the U.S. DOT table and/or mapping tool)

Response	Estimated percent of applicants
Yes	85%
No	7%
Don't know	8%

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates in this table have a margin of error of 5.31 percentage points or fewer.

If applicants answered “yes” to the above question, then the survey asked the following question:

Table 17: How useful were the following tools in preparing your FY 2022 RAISE grant application(s)? U.S. Department of Transportation (DOT) tools to identify whether your project was located in an Area of Persistent Poverty and/or a Historically Disadvantaged Community (the U.S. DOT table and/or mapping tool)

Response	Estimated percent of applicants
Very useful	67%
Moderately useful	23%
Slightly useful	8%
Not at all useful	-
No opinion / No basis to judge	-

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates in this table have a margin of error of 5.31 percentage points or fewer.

Cells marked “-” had fewer than 20 responses and are not reported in this table.

Table 18: Overall, how confident are you that you correctly identified whether your project(s) for the fiscal year 2022 RAISE grant application(s) was located in an urban or rural area as defined by the U.S. Department of Transportation (DOT)?

Response	Estimated percent of applicants
Very confident	83%
Moderately confident	12%
Slightly confident	-
Not at all confident	-
Don't know	-

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Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates in this table have a margin of error of 5.31 percentage points or fewer.

Cells marked "-" had fewer than 20 responses and are not reported in this table.

Table 19: Overall, how confident are you that you correctly identified whether your project(s) for the fiscal year 2022 RAISE grant application(s) was located in an Area of Persistent Poverty and/or a Historically Disadvantaged Community as defined by the U.S. Department of Transportation (DOT)?

Response	Estimated percent of applicants
Very confident	73%
Moderately confident	18%
Slightly confident	5%
Not at all confident	-
Don't know	-

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates in this table have a margin of error of 5.31 percentage points or fewer.

Cells marked "-" had fewer than 20 responses and are not reported in this table.

Use of Consultant or Contractor Questions

Table 20: Did you use a consultant or contractor for your application(s)?

Response	Estimated percent of applicants
Yes	61%
No	37%
Don't know	-

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates in this table have a margin of error of 5.31 percentage points or fewer.

Cells marked "-" had fewer than 20 responses and are not reported in this table.

"Yes" is the estimated percent of applicants that used a consultant or contractor for at least one of their applications.

If applicants answered "yes" to the above question for any of their applications, then the survey asked the questions in table 21:

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Table 21: Did any of the following reasons contribute to your decision to use a consultant or contractor?

Reason	Estimated percent of applicants	
	Yes	No
Needed assistance with completing the application(s) by the deadline	75%	25%
Needed assistance with conducting the benefit-cost analysis	92%	8%
Needed assistance with developing the project budget	-	-
Needed assistance with drafting the project narrative (e.g., project description, location, maps, and graphics)	70%	30%
Needed assistance with developing information for the selection criteria	74%	26%
Needed assistance with drafting the environmental risk section (e.g., permitting, National Environmental Policy Act (NEPA), environmental reviews)	66%	34%
We had an existing relationship with a consultant or contractor	84%	16%
Other (please specify)	-	-

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates shown in this table have a margin of error of 5.31 percentage points or fewer.

Cells marked “-” had a margin of error too large to include in this table.

Results for “needed assistance with conducting the benefit-cost analysis” include only applicants that submitted a capital grant application, as DOT only required these applicants to submit a benefit-cost analysis.

If applicants answered “no” to the question in table 20 for any of their applications, then the survey asked the questions in table 22:

Table 22: Did any of the following reasons contribute to your decision to not use a consultant or contractor?

Reason	Estimated percent of applicants	
	Yes	No
Relied on in-house expertise to prepare the application(s)	94%	-
Relied on a partner organization’s expertise to prepare the application(s)	-	-
Not enough time to procure a consultant or contractor	-	-

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Reason	Estimated percent of applicants	
	Yes	No
No response to a request for proposal (RFP) for a consultant or contractor	-	97%
Lack of financial resources to procure a consultant or contractor	-	-
Other (please specify)	-	-

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates shown in this table have a margin of error of 5.31 percentage points or fewer.

Cells marked “-” had fewer than 20 responses or a margin of error too large to include in this table.

If applicants answered “yes” to the question in table 20 for any of their applications, the survey asked the following question:

Table 23: Approximately how much did your organization spend on a consultant or contractor in order to help prepare the FY 22 RAISE grant application(s) you submitted?

Response	Estimated percent of applicants
\$0-\$10,000	33%
\$10,001-\$20,000	17%
\$20,001-\$30,000	17%
\$30,001-\$40,000	11%
\$40,001-\$50,000	9%
\$50,001 and above	14%

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates shown in this table have a margin of error of 5.31 percentage points or fewer.

Challenges Questions

Table 24: How challenging were the following aspects to you while applying for FY 2022 RAISE funding?

Aspect	Estimated percent of applicants				
	Very challenging	Moderately challenging	Slightly challenging	Not at all challenging	No basis to judge
Using grants.gov	7%	20%	30%	38%	5%
Completing the application by the submission deadline	11%	29%	31%	27%	-

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Aspect	Estimated percent of applicants				
	Very challenging	Moderately challenging	Slightly challenging	Not at all challenging	No basis to judge
Having sufficient staff expertise to complete the application	24%	29%	26%	18%	-
Having sufficient staff capacity to complete the application	33%	31%	21%	13%	-
Demonstrating outcomes in alignment with selection criteria	15%	36%	31%	15%	-
Developing a benefit-cost analysis (capital projects only)	40%	29%	19%	6%	6%
Identifying sources of matching funds	13%	19%	21%	42%	5%
Obtaining support letters	-	13%	31%	50%	-
Demonstrating benefits for disadvantaged communities	10%	22%	27%	36%	5%
Procuring a consultant or contractor to help prepare the application	6%	7%	13%	45%	29%

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates shown in this table have a margin of error of 5.31 percentage points or fewer.

Cells marked “-” had fewer than 20 responses and are not reported in this table.

For “developing a benefit-cost analysis (capital projects only)”, we only included responses from applicants who applied for a capital project, as DOT only required these applicants to submit a benefit-cost analysis.

Evaluation and Award Process Questions

Table 25: How transparent was the evaluation process the U.S. Department of Transportation (DOT) used to award FY 2022 RAISE funding?

Response	Estimated percent of applicants
Very transparent	19%
Moderately transparent	39%
Slightly transparent	22%
Not at all transparent	11%
No opinion / no basis to judge	8%

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates in this table have a margin of error of 5.31 percentage points or fewer.

Awarded Applicant Questions

Table 26: How sufficient was the information the U.S. Department of Transportation (DOT) provided on why your application(s) was awarded a FY 2022 RAISE grant?

Response	Unweighted number of respondents
Very sufficient	32
Moderately sufficient	41
Slightly sufficient	25
Not at all sufficient	-
No opinion / no basis to judge	-

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The results in this table have not been weighted to account for non-response bias and are not generalizable to all fiscal year 2022 RAISE award recipients.

Cells marked "-" had fewer than 20 responses and are not reported in this table.

Table 27: How clear is it to you why your application(s) was awarded a FY 2022 RAISE grant?

Response	Unweighted number of respondents
Very clear	44
Moderately clear	35
Slightly clear	26
Not at all clear	-
No opinion / no basis to judge	-

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The results in this table have not been weighted to account for non-response bias and are not generalizable to all fiscal year 2022 RAISE award recipients.

Cells marked "-" had fewer than 20 responses and are not reported in this table.

Non-Awarded Applicant Questions

Table 28: How sufficient was the information the U.S. Department of Transportation (DOT) provided on why your application(s) was not awarded a FY 2022 RAISE grant?

Response	Estimated percent of applicants
Very sufficient	20%
Moderately sufficient	33%
Slightly sufficient	24%
Not at all sufficient	16%
No opinion / no basis to judge	7%

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Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates in this table have a margin of error of 5.31 percentage points or fewer.

Table 29: How clear is it to you why your application(s) was not awarded a fiscal year 2022 RAISE grant?

Response	Estimated percent of applicants
Very clear	21%
Moderately clear	31%
Slightly clear	25%
Not at all clear	18%
No opinion / no basis to judge	5%

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates in this table have a margin of error of 5.31 percentage points or fewer.

Table 30: How useful would it be if the U.S. Department of Transportation (DOT) provided written information as part of its feedback to non-awarded applicants?

Response	Estimated percent of applicants
Very useful	79%
Moderately useful	13%
Slightly useful	5%
Not at all useful	-
No opinion / no basis to judge	-

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates in this table have a margin of error of 5.31 percentage points or fewer.

Cells marked "-" had fewer than 20 responses and are not reported in this table.

Table 31: Did you have a debriefing meeting with the U.S. Department of Transportation (DOT) on your fiscal year 2022 RAISE grant application(s)?

Response	Estimated percent of applicants
Yes	78%
No	18%
Don't know	-

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

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Notes: The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates in this table have a margin of error of 5.31 percentage points or fewer.

Cells marked “-” had fewer than 20 responses and are not reported in this table.

If applicants “yes” to the above question, then the survey asked the following four questions (see tables 32 – 35):

**Table 32: How useful was the debrief meeting for the following purposes?
Learning why your project(s) was not funded**

Response	Estimated percent of applicants
Very useful	42%
Moderately useful	32%
Slightly useful	19%
Not at all useful	7%
No opinion / no basis to judge	-

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates in this table have a margin of error of 5.31 percentage points or fewer.

Cells marked “-” had fewer than 20 responses and are not reported in this table.

**Table 33: How useful was the debrief meeting for the following purposes?
Learning how to improve your application(s) to make it more competitive**

Response	Estimated percent of applicants
Very useful	39%
Moderately useful	32%
Slightly useful	19%
Not at all useful	10%
No opinion / no basis to judge	-

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates in this table have a margin of error of 5.31 percentage points or fewer.

Cells marked “-” had fewer than 20 responses and are not reported in this table.

**Table 34: How useful was the debrief meeting for the following purposes?
Deciding whether to apply again for a RAISE grant for this project(s)**

Response	Estimated percent of applicants
Very useful	44%
Moderately useful	27%

**Appendix II: GAO Survey of Fiscal Year 2022
Rebuilding American Infrastructure with
Sustainability and Equity (RAISE) Applicants**

Response	Estimated percent of applicants
Slightly useful	17%
Not at all useful	8%
No opinion / no basis to judge	-

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates in this table have a margin of error of 5.31 percentage points or fewer.

Cells marked “-” had fewer than 20 responses and are not reported in this table.

Table 35: How useful was the debrief meeting for the following purposes? Deciding whether RAISE is the right U.S. Department of Transportation (DOT) grant program for this project(s)

Response	Estimated percent of applicants
Very useful	38%
Moderately useful	28%
Slightly useful	18%
Not at all useful	10%
No opinion / no basis to judge	7%

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates in this table have a margin of error of 5.31 percentage points or fewer.

Future RAISE Funding Questions

Table 36: How clear is it to you how to be competitive for future RAISE funding?

Response	Estimated percent of applicants
Very clear	28%
Moderately clear	41%
Slightly clear	20%
Not at all clear	9%
No opinion / no basis to judge	-

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates in this table have a margin of error of 5.31 percentage points or fewer.

Cells marked “-” had fewer than 20 responses and are not reported in this table.

**Appendix II: GAO Survey of Fiscal Year 2022
Rebuilding American Infrastructure with
Sustainability and Equity (RAISE) Applicants**

Table 37: Did your organization submit a fiscal year 2023 RAISE grant application?

Response	Estimated percent of applicants
Yes	59%
No	37%
Don't know	-

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates in this table have a margin of error of 5.31 percentage points or fewer.

Cells marked "-" had fewer than 20 responses and are not reported in this table.

If applicants answered "yes" to the above question, the survey asked the following question:

Table 38: Has your organization's experience applying for fiscal year 2023 RAISE funding been similar to its experience applying for fiscal year 2022 RAISE funding?

Response	Estimated percent of applicants
Yes	81%
No	14%
Don't know	-

Source: GAO survey of fiscal year 2022 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) applicants. | GAO-24-106280

Notes: The estimates shown are weighted to account for non-response bias and rounded to the nearest percent.

All estimates in this table have a margin of error of 5.31 percentage points or fewer.

Cells marked "-" had fewer than 20 responses and are not reported in this table.

Appendix III: Information on Rebuilding American Infrastructure with Sustainability and Equity (RAISE) Awards for FY 2022

We analyzed RAISE grant award data for fiscal year 2022 based on grant type, transportation mode, applicant type, and geographic location.¹ The U.S. Department of Transportation (DOT) awarded \$2.25 billion for 166 surface transportation projects for fiscal year 2022.²

RAISE Funding by Grant Type

DOT awarded the majority of fiscal year 2022 RAISE funding—about 93 percent, or about \$2 billion—for capital grants. DOT awarded about 8 percent (or about \$169 million) of funding for planning grants. The amount awarded for planning grants exceeded the minimum statutory requirement.³ See figure 3.

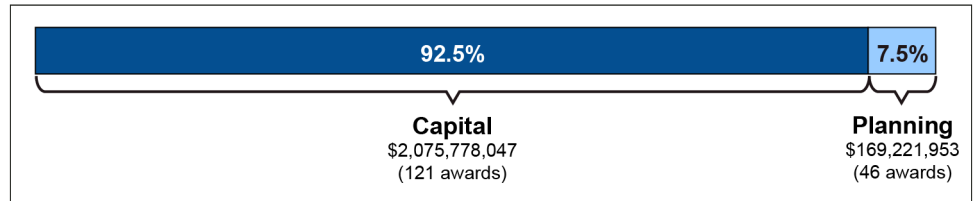
¹To assess the reliability of RAISE's grant award data for fiscal year 2022, we reviewed DOT documentation (e.g., data dictionaries, selection memoranda); conducted a series of logic tests on the data; and traced information to source documents. We discussed the data with knowledgeable DOT officials. We determined that DOT's RAISE grant award data for fiscal year 2022 were sufficiently reliable for our purposes of describing the distribution of RAISE award funding.

²For information on RAISE awards from fiscal years 2015 through 2021, see GAO, *Discretionary Transportation Grants: DOT Should Better Communicate Federal Share Requirements to Applicants*, [GAO-23-105639](#) (Washington, D.C.: Nov. 17, 2022).

³Infrastructure Investment and Jobs Act (IIJA) and Consolidated Appropriations Act, 2022 provisions require that of the amounts made available to carry out the RAISE program, not less than 5 percent (\$113.75 million for fiscal year 2022) be made available by DOT for the planning, preparation or design of eligible projects (Pub. L. No. 117-58, § 21202(a), 135 Stat. 429, 675 (2021); Pub. L. No. 117-103, div. L., tit. I, 136 Stat. 49, 685 (2022)); this amount includes \$75 million in IIJA funding and \$38.75 million in Consolidated Appropriations Act, 2022 funding.

Appendix III: Information on Rebuilding American Infrastructure with Sustainability and Equity (RAISE) Awards for FY 2022

Figure 3: Fiscal Year 2022 RAISE Funding Awarded by Grant Type



Source: GAO analysis of U.S. Department of Transportation Rebuilding American Infrastructure with Sustainability and Equity (RAISE) data. | GAO-24-106280

Accessible data for Figure 3: Fiscal Year 2022 RAISE Funding Awarded by Grant Type

	Capital	Planning
Dollars	\$2,075,778,047	\$169,221,953
Percent	92.5%	7.5%
Awards	121	46

Source: GAO analysis of U.S. Department of Transportation Rebuilding American Infrastructure with Sustainability and Equity (RAISE) data. | GAO-24-106280

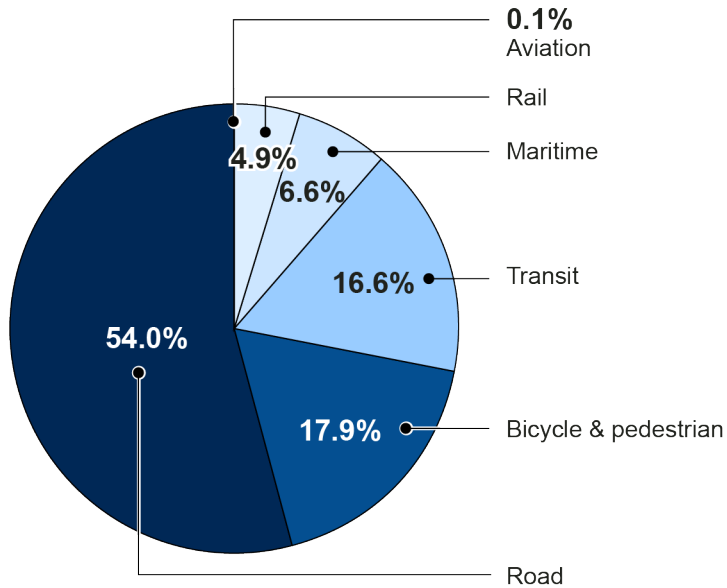
Note: Of the 166 projects the U.S. Department of Transportation awarded funding, one project received both a capital and a planning grant. Two projects received funding from both the Infrastructure Investment and Jobs Act and Consolidated Appropriations Act, 2022. For the purpose of the figure, we consider those two projects to have received one award each.

RAISE Funding by Transportation Mode

DOT awarded funds to various transportation modes and awarded the majority of funding to road projects. Road projects accounted for about \$1.2 billion (54 percent), bicycle and pedestrian projects accounted for about \$401 million (about 18 percent), and transit projects accounted for about \$373 million (about 17 percent) of the total funding. DOT awarded the remaining funding for maritime, rail, and aviation projects. See figure 4.

Appendix III: Information on Rebuilding American Infrastructure with Sustainability and Equity (RAISE) Awards for FY 2022

Figure 4: Fiscal Year 2022 RAISE Funding Awarded by Transportation Mode



Source: GAO analysis of U.S. Department of Transportation Rebuilding American Infrastructure with Sustainability and Equity (RAISE) data. | GAO-24-106280

Accessible data table for Figure 4: Fiscal Year 2022 RAISE Funding Awarded by Transportation Mode

Mode	Percent
Aviation	0.1%
Rail	4.9
Maritime	6.6
Transit	16.6
Bicycle & pedestrian	17.9
Road	54

Source: GAO analysis of U.S. Department of Transportation Rebuilding American Infrastructure with Sustainability and Equity (RAISE) - data. | GAO-24-106280

Note: Percentages do not add to 100 percent due to rounding.

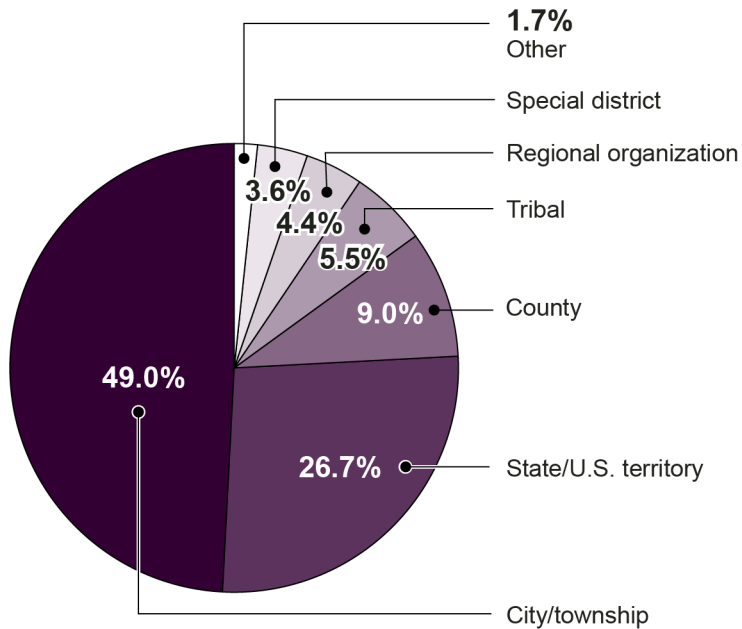
RAISE Funding by Applicant Type

DOT awarded funds to various applicant types and awarded nearly half the funding to city or township governments. Combined, city or township governments received about \$1.1 billion (49 percent of the total funding). States and U.S. territorial governments received about \$600 million

Appendix III: Information on Rebuilding American Infrastructure with Sustainability and Equity (RAISE) Awards for FY 2022

(about 27 percent). County governments received about \$203 million (9 percent). DOT distributed the remaining funds to Tribal governments, regional organizations, special districts, or other entities. See figure 5.

Figure 5: Fiscal Year 2022 RAISE Funding Awarded by Applicant Type



Source: GAO analysis of U.S. Department of Transportation Rebuilding American Infrastructure with Sustainability and Equity (RAISE) data. | GAO-24-106280

Accessible data table for Figure 5: Fiscal Year 2022 RAISE Funding Awarded by Applicant Type

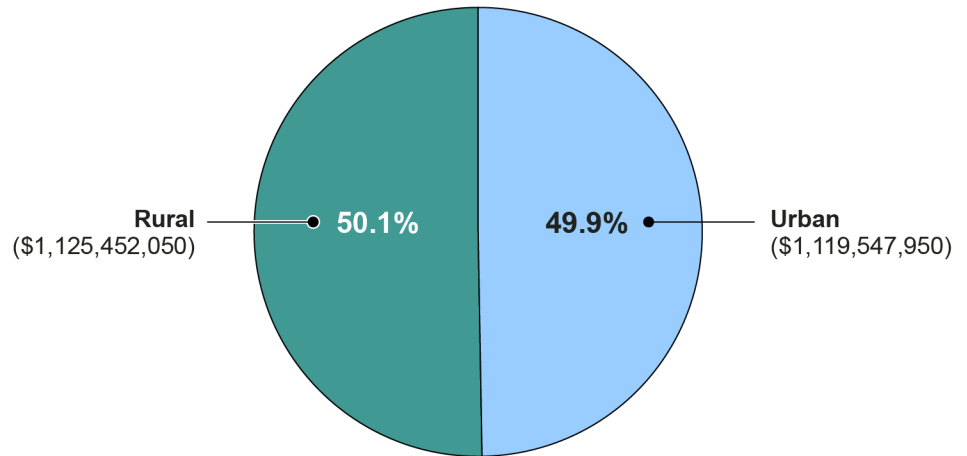
Applicant	Percent
Other	1.7%
Special district	3.6
Regional organization	4.4
Tribal	5.5
County	9
State/ U.S. territory	26.7
City/township	49

Source: GAO analysis of U.S. Department of Transportation Rebuilding American Infrastructure with Sustainability and Equity (RAISE) - data. | GAO-24-106280

RAISE Funding by Urban and Rural Area

DOT awarded nearly equal amounts of funding to urban and rural areas. The IIJA and the Consolidated Appropriations Act of fiscal year 2022 directed DOT to award no more than 50 percent of the funding to either rural or urban projects. DOT awarded about \$1.1 billion to projects in urban areas and about \$1.1 billion to projects in rural areas. DOT officials said they misidentified one project as urban rather than rural. Officials said they plan to rebalance the funding during grant negotiations to meet the required distribution. See figure 6.

Figure 6: Fiscal Year 2022 RAISE Funding Awarded to Urban and Rural Areas



Source: GAO analysis of U.S. Department of Transportation Rebuilding American Infrastructure with Sustainability and Equity (RAISE) data. | GAO-24-106280

Accessible data for Figure 6: Fiscal Year 2022 RAISE Funding Awarded to Urban and Rural Areas

	Rural	Urban
Percent	50.1%	49.9%
Dollars	\$1,125,452,050	\$1,119,547,950

Source: GAO analysis of U.S. Department of Transportation Rebuilding American Infrastructure with Sustainability and Equity (RAISE) - data. | GAO-24-106280

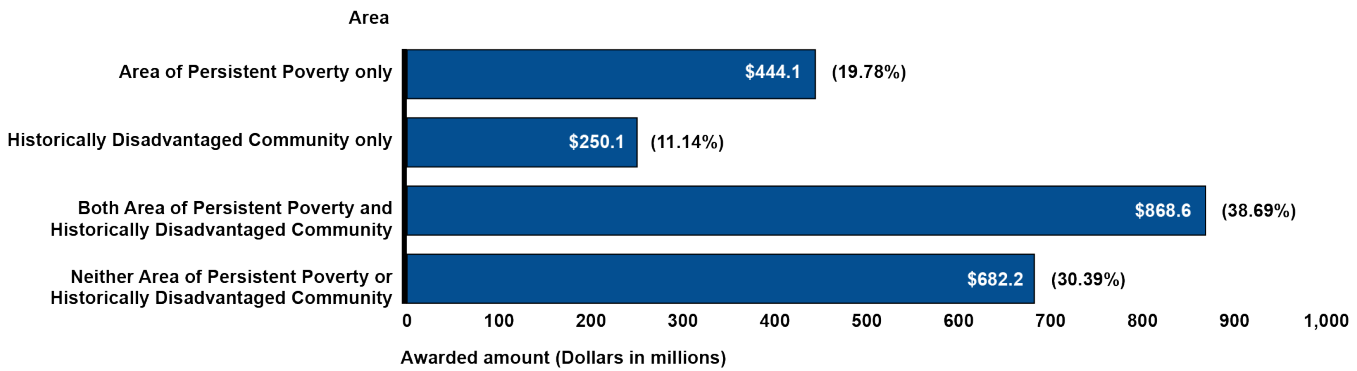
RAISE Funding by Area of Persistent Poverty and Historically Disadvantaged Community Status

DOT awarded the largest share of funding to applicants that were in Areas of Persistent Poverty and/or Historically Disadvantaged

Appendix III: Information on Rebuilding American Infrastructure with Sustainability and Equity (RAISE) Awards for FY 2022

Communities. Our analysis of DOT data found that DOT awarded almost \$1.6 billion (70 percent of total fiscal year 2022 RAISE funding) to projects in these areas. See figure 7. Of the total amount made available to carry out the RAISE program for each fiscal year, the IIJA requires DOT to award at least 1 percent for projects in these areas. The RAISE fiscal year 2022 notice of funding opportunity identified that DOT would award at least \$35 million for such projects.

Figure 7: Fiscal Year 2022 RAISE Funding Awarded to Projects in Areas of Persistent Poverty and/or Historically Disadvantaged Communities



Source: GAO analysis of U.S. Department of Transportation Rebuilding American Infrastructure with Sustainability and Equity (RAISE) data. | GAO-24-106280

Accessible data table for Figure 7: Fiscal Year 2022 RAISE Funding Awarded to Projects in Areas of Persistent Poverty and/or Historically Disadvantaged Communities

Area	Awarded amount (Dollars in millions)	Percent
Area of Persistent Poverty Only	\$444.1	19.78%
Historically Disadvantaged Community Only	\$250.1	11.14
Both Area of Persistent Poverty and Historically Disadvantaged Community	\$868.6	38.69
Neither Area of Persistent Poverty or Historically Disadvantaged Community	\$682.2	30.39

Source: GAO analysis of U.S. Department of Transportation Rebuilding American Infrastructure with Sustainability and Equity (RAISE) data. | GAO-24-106280

RAISE Funding by State

DOT awarded at least one grant to applicants in all 50 states, the District of Columbia, Puerto Rico, the Northern Mariana Islands, and the U.S.

Appendix IV: Comments from the U.S. Department of Transportation



U.S. Department of
Transportation
Office of the Secretary
of Transportation

Assistant Secretary
for Administration

1200 New Jersey Avenue, SE
Washington, DC 20590

October 16, 2023

Elizabeth Repko
Director, Physical Infrastructure
U.S. Government Accountability Office (GAO)
441 G Street NW
Washington, DC 20548

Dear Ms. Repko:

The US Department of Transportation (Department) is committed to evaluating Rebuilding American Infrastructure with Sustainability and Equity (RAISE) grant applications in alignment with federal guidance. Pursuant to 2 CFR 200, the Department has outlined the statutorily required merit-based application evaluation process in an annual notice of funding opportunity (NOFO) since the program's inception in 2009. The Department recognizes the importance of both fairness and transparency in the application review process and most notably included a new merit criteria rating rubric in the FY 2022 and FY 2023 RAISE NOFOs, which details how each criterion will be rated. Additionally, the Department is addressing one of the more challenging aspects of preparing a RAISE grant application—the benefit-cost analysis—by publishing a template available for use by FY 2024 RAISE applicants.

Upon review of the draft report, the Department concurs with GAO's recommendations 1-3 to assist applicants and strengthen the RAISE evaluation process; however, the Department concurs with recommendation 4, with clarification, and non-concurs with recommendation 5. With respect to recommendation 4, related to disclosing all selection criteria, the Department will ensure that the RAISE NOFO identifies all selection factors. In the FY 2022 RAISE NOFO, the Department considers its inclusion of the following statement regarding award decisions—"the Secretary selects projects from the Highly Rated List for award, consistent with the selection criteria and statutory requirements for *geographic* and modal *diversity*"—to have sufficiently notified potential applicants that project location would be a selection factor. The Department, however, does not agree with the report's characterizations of the selection portfolio. The portfolio is used solely to facilitate documenting highly-rated projects not selected for award. The NOFO included all the information needed by applicants to draft competitive applications. With respect to GAO's recommendation 5, related to documenting why highly-rated projects were not selected, the Department believes that its portfolio process adequately documents why projects are not selected and that no further documentation is necessary. We will provide a detailed response to these recommendations within 180 days of the final report's issuance.

The Department appreciates the opportunity to respond to the GAO draft report. Please contact Gary Middleton, Director of Audit Relations and Program Improvement, at 202-366-6512 with any questions or if you would like to obtain additional details.

Sincerely,

A handwritten signature in black ink, appearing to read "Philip McNamara".

Philip McNamara
Assistant Secretary for Administration

Text of Appendix IV: Comments from the U.S. Department of Transportation

October 16, 2023

Elizabeth Repko

Director, Physical Infrastructure

U.S. Government Accountability Office (GAO) 441 G Street NW

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**Appendix IV: Comments from the U.S.
Department of Transportation**

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Sincerely,

Philip McNamara

Assistant Secretary for Administration

Appendix V: GAO Contact and Staff Acknowledgments

GAO Contact

Elizabeth Repko, (202) 512-2834 or repkoe@gao.gov

Staff Acknowledgments

In addition to the contact named above, Matt Barranca (Assistant Director), Travis Schwartz (Analyst in Charge), John Bornmann, Kathryn Fledderman, Geoffrey Hamilton, Alicia Loucks, Steve Martinez, Abinash Mohanty, Dae Park, Malika Rice, and Elizabeth Wood made key contributions to this report.

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