



# **Federal Aviation Administration**

## **Airport Coronavirus Response Grant Program** **Frequently Asked Questions**

This document answers frequently asked questions (FAQs) stakeholders may have related to the approximately \$2 billion in grants for airports under the Coronavirus Response and Relief Supplemental Appropriation Act, 2021 (CRRSA).

The Federal Aviation Administration (FAA) has additional information for airport sponsors concerning COVID-19 available at [www.faa.gov/airports](http://www.faa.gov/airports).

The guidance here is not legally binding in its own right and FAA will not rely on it as a separate basis for affirmative enforcement action or other administrative penalty. Conformity with this guidance, as distinct from existing statutes, regulations, and grant assurances, is voluntary only, and nonconformity will not affect existing rights and obligations.

In addition to these grants, FAA is administering approximately \$10 billion in grants for airports under the Coronavirus Aid, Relief, and Economic Security (CARES) Act. For information on CARES Act funding, please visit [https://www.faa.gov/airports/cares\\_act/](https://www.faa.gov/airports/cares_act/).

For questions related to either the CARES or CRRSA programs, please email [CARESAirports@faa.gov](mailto:CARESAirports@faa.gov).

**This update adds new questions Q-CR16 and Q-CR17. This update also includes clarifying edits to questions Q-GA16 and Q-CR15.**

These FAQs will be updated periodically.

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**General Questions**

**Q1: How does the Coronavirus Response and Relief Supplemental Appropriation Act benefit airports and airport concessions?**

**A:** On December 27, 2020, the President signed the Consolidated Appropriations Act, 2021. Division M of that Act is the Coronavirus Response and Relief Supplemental Appropriation Act, 2021 (CRRSA). Title IV of CRRSA provides approximately \$2 billion in economic relief to airports to prevent, prepare for, and respond to the COVID-19 pandemic, including relief from rent and minimum annual guarantees (MAG) for eligible airport concessions at primary airports.

**Q2: Where is this funding coming from?**

**A:** The funds are coming directly from the U.S. Treasury’s General Fund to prevent, prepare for, and respond to the impacts of the COVID-19 pandemic. FAA’s Office of Airports will administer these grant funds to airport sponsors.

**Q3: Who is eligible to receive funding under CRRSA?**

**A:** CRRSA funds are available to most sponsors as defined in section 47102 of title 49, United States Code (U.S.C.); that is, airport sponsors meeting statutory and policy requirements under this section and identified in the FAA’s current National Plan of Integrated Airport Systems (NPIAS).

A portion of the funds available under CRRSA is for the Small Community Air Service Development Program (SCASDP), which is administered by the Office of the Secretary of Transportation (OST). More information about SCASDP can be found at <https://www.transportation.gov/policy/aviation-policy/small-community-rural-air-service/SCASDP>.

**Q4: Are any airport sponsors not eligible to receive funding under CRRSA?**

**A:** CRRSA prohibits funding for any airport that was allocated more than four times its annual operating expenses under the CARES Act (Public Law 116-136). FAA used airports' reported fiscal year (FY) 2018 operating expenses to determine allocations. This prohibition affects 31 airports, and their respective CRRSA allocations will be zero when FAA announces award allocations.

**Q5: What is the period of availability for FAA to obligate CRRSA funding?**

**A:** Funds are available until September 30, 2021, and must be obligated by that date. FAA intends to award grants and obligate these funds on an expedited basis.

**Q6: Are airport sponsors in the Republic of the Marshall Islands, Federated States of Micronesia, Republic of Palau, and Wake Island eligible for the Airport Coronavirus Response Grant Program?**

**A:** No. CRRSA states only sponsors of airports in categories defined in 49 U.S.C. 47102 are eligible. Eligible airports are included in the NPIAS. Airports in the Republic of the Marshall Islands, Federated States of Micronesia, Republic of Palau, and Wake Island are not included in the NPIAS. While these airport sponsors may be eligible for some AIP discretionary funding, they are not eligible under CRRSA.

**Q7: Are airports in U.S. territories eligible for the Airport Coronavirus Response Grant Program?**

**A:** Yes. CRRSA states only sponsors of airports in categories defined in 49 U.S.C. 47102 are eligible. Eligible airports are included in the NPIAS. Airports in U.S. territories (American Samoa, Northern Mariana Islands, Puerto Rico, the U.S. Virgin Islands, and Guam) are included in the NPIAS.

**Q8: Can an airport sponsor use the Airport Coronavirus Response Grant Program funding and funding from other Federal programs to pay for expenses related to the COVID-19 pandemic?**

**A:** A sponsor may use Airport Coronavirus Response Grant Program grants for airport operating expenses that arise due to the COVID-19 pandemic. FAA recognizes that several sources of COVID-19 relief funds may be available to airport sponsors. Airport sponsors may use other sources of funding consistent with the terms of those programs. However, an airport sponsor may not invoice under its grant for expenses that have been reimbursed under another program.

## Questions on Allocation of Funds

**Q-F1: How will this funding be allocated to airport sponsors?**

**A:** CRRSA divides the \$2 billion funding into four groups by formula that result in specific allocations to each eligible airport. The grants for these four groups are not discretionary. The four groups (not including SCASDP, which is administered by OST) are:

- Primary Commercial Service Airports and Certain Cargo Airports share not less than \$1.75 billion based first on the statutory Airport Improvement Program (AIP) primary and cargo entitlement formulas. However, the \$26-million limit under 49 U.S.C. 47114(c)(1)(C)(iii) and reduction for imposing passenger facility charges under 49 U.S.C. 47114(f) do not apply to these allocations. After allocating based on the statutory entitlement formulas, the remainder is then allocated based on the number of enplanements the airport had in the most recent calendar year of available enplanement data, which is calendar year (CY) 2019, as a percentage of total 2019 enplanements for all primary airports. Sponsors may use these funds for costs related to operations, personnel, cleaning, sanitization, janitorial services, combating the spread of pathogens at the airport, and debt service payments.
- Non-Primary Commercial Service and General Aviation Airports share not less than \$45 million (less the amount allocated for non-primary airports participating in the FAA Contract Tower Program) allocated based on the categories (National, Regional, Local, and Basic) published in [the most current NPIAS](#), reflecting the percentage of the aggregate published eligible development costs for each such category, and then dividing the allocated funds evenly among the eligible airports in each category, rounded up to the nearest thousand. Sponsors may use these funds for costs related to operations, personnel, cleaning, sanitization, janitorial services, combating the spread of pathogens at the airport, and debt service payments.
- Non-Primary Airports Participating in the FAA Contract Tower Program share not less than \$5 million of the \$45 million available to non-primary airports. These funds are divided equally among eligible airports. Sponsors may use these funds to cover lawful expenses to support FAA contract tower operations. More information on the FAA Contract Tower Program is available at [https://www.faa.gov/about/office\\_org/headquarters\\_offices/ato/service\\_units/mission\\_support/faa\\_contract\\_tower\\_program/](https://www.faa.gov/about/office_org/headquarters_offices/ato/service_units/mission_support/faa_contract_tower_program/).
- Primary Commercial Service Airports share not less than \$200 million allocated based on the number of enplanements the airport had in CY 2019 as a percentage of total CY 2019 enplanements for all primary airports. Sponsors may use these funds to provide relief from rent and minimum annual guarantees (MAG) to on-airport car rental, on-airport parking, and in-terminal airport concessions.

- Q-F2: How will FAA handle unallocated funds remaining under the CARES Act?**  
**A:** There are some remaining funds under the CARES Act that FAA did not allocate. Additionally, a limited amount of allocated CARES Act funds were declined by eligible airport sponsors. CRRSA requires these funds to be allocated to primary airports based on the most recent calendar year of available data, which is CY 2019, as described in Q-F1. FAA intends to announce the final total of unallocated CARES Act funds and the re-allocation totals in the near future. FAA will work with airport sponsors to make these additional funds available for expenditure.
- Q-F3: How did FAA use the NPIAS airport categorization to determine CRRSA allocations for non-primary airport sponsors?**  
**A:** Under CRRSA, not less than \$45 million was allocated to non-primary airports based on the categories in the [National Plan of Integrated Airport Systems \(NPIAS\) 2021-2025](#), issued September 30, 2020, updated to reflect current status for FY 2021. [FAA Order 5090.5, Formulation of the NPIAS and ACIP](#) defines the criteria for each category or role.
- Q-F4: Why do airports with a NPIAS category of Unclassified not receive an allocation under CRRSA?**  
**A:** CRRSA allocates funds for non-primary airports based on the percentage of the aggregate published eligible development costs for each category that is then divided evenly among eligible airports in each category. As documented in the NPIAS 2021-2025, consistent with their role in the national airport system, unclassified airports have no development needs identified through 2025.
- Q-F5: Do airport sponsors have to contribute a local match for the Airport Coronavirus Response Grant Program?**  
**A:** No. Grants under the Airport Coronavirus Response Grant Program are available at a 100% Federal share.
- Q-F6: Will FY 2021 AIP or Supplemental Discretionary grants be made at a 100% share?**  
**A:** No. CRRSA did not provide funding to increase the Federal share on FY 2021 AIP or Supplemental Discretionary grants.

## Questions on Use of Funds

**Q-U1: How can an airport sponsor use Airport Coronavirus Response Grant Program funds?**

**A:** An airport sponsor may use these funds for costs related to operations, personnel, cleaning, sanitization, janitorial services, combating the spread of pathogens at the airport, and debt service payments. Grant recipients should follow FAA's [Policy and Procedures Concerning the Use of Airport Revenues \("Revenue Use Policy"\)](#), 64 Federal Register 7696 (64 FR 7696), as amended by [79 Federal Register 66282 \(79 FR 66282\)](#). The Revenue Use Policy document provides guidance regarding permitted and prohibited uses of airport revenue. In addition, while CRRSA limits the use of funds to certain stated eligible costs, it states that funds may not be used for any purpose not directly related to the airport. Grant recipients also should review the [Information for Airport Sponsors Considering COVID-19 Restrictions or Accommodations](#) for clarifying COVID-19 revenue use guidance.

**Q-U2: Can Airport Coronavirus Response Grant Program funds be used to reimburse operational expenses?**

**A:** Yes. FAA will reimburse sponsors for operational expenses directly related to the airport incurred on or after January 20, 2020. Operational expenses are those expenses necessary to operate, maintain, and manage an airport. They include expenses such as payroll, utilities, service contracts, and items generally having a limited useful life, including personal protective equipment and cleaning supplies.

**Q-U3: Can Airport Coronavirus Response Grant Program funds be used to reimburse debt service payments?**

**A:** Yes. FAA will reimburse sponsors for debt service payments directly related to the airport that are due on or after December 27, 2020, which is the date of enactment of CRRSA.

**Q-U4: Can Airport Coronavirus Response Grant Program funds be used to reimburse monthly payments into a debt service reserve fund?**

**A:** Yes. FAA will reimburse sponsors for monthly payments into a debt service reserve fund (also called a debt service sinking fund or similar name), which are directly related to the airport, that are due on or after December 27, 2020, which is the date of enactment of CRRSA. The airport sponsor must ensure that these payments are restricted to only debt service payments. The airport sponsor will submit a detailed invoice summary with its payment request. All documentation of the payment and disbursements must be retained for three years after the grant is closed as required by 2 CFR § 200.334.

**Q-U5: Can Airport Coronavirus Response Grant Program funds be used for new airport development on the airport?**

**A:** Yes. However, there are limitations on the type of development for which the funding can be used. Any development-related costs must be associated with combating the spread of pathogens at the airport. Examples of eligible development would be replacing or upgrading a heating, ventilation, and air conditioning (HVAC) system; reconfiguring the terminal to accommodate increased social distancing; or reconfiguring terminal space or other facilities to accommodate health screening. A sponsor seeking to use the funds for new airport development or construction should contact its local Airports District Office or Airports Regional Office. That office will ensure that such development is consistent with requirements for airport development. The Airports District Office or Airports Regional Office also will assist the airport sponsor with executing a Development Addendum for its intended project.

**Q-U6: Can Airport Coronavirus Response Grant Program funds be used to prepay long-term contracts (for example, shuttle-bus operators, janitorial services, security services, fire and police services)?**

**A:** Yes, provided the prepayment is a *bona fide* transaction where the airport sponsor receives the benefit of the prepaid services and receives some value in exchange for committing in advance.

**Q-U7: Can Airport Coronavirus Response Grant Program funds be deposited in the airport sponsor's general reserve account (or invest them for future use)?**

**A:** No. FAA would not be able to ensure a potential future use is a use consistent with CRRSA requirements.

**Q-U8: Is there a limit on using Airport Coronavirus Response Grant Program funds for operational expenses?**

**A:** No. An airport sponsor may use all of its awarded funds for allowable airport operational expenses or debt service payments.

**Q-U9: Can Airport Coronavirus Response Grant Program funds be used to reimburse for a cost associated with an aeronautical service or product provided by the airport sponsor?**

**A:** Yes, in certain circumstances. Airport Coronavirus Response Grant Program funds are available to reimburse the costs associated with aeronautical products or services offered by the airport sponsor but only when the sponsor certifies it is the only provider of the same product or service at the airport. These services include aviation fuels, equipment, parts, supplies, and facilities for aircraft storage or maintenance. Costs associated with flight training or aviation training are not eligible for reimbursement.

**Q-U10: Can Airport Coronavirus Response Grant Program funds be used to reimburse depreciation?**

**A:** No. Depreciation is not an allowable expense under the Airport Coronavirus Response Grant Program. Although depreciation is an allowable operating expense by both the 2 CFR part 200 and the Revenue Use Policy, it does not impact cash flow because the cash or donation was considered at the acquisition of the asset, and the asset could have been financed by long-term debt, Federal grants, current funds, or donation.

**Q-U11: Can the Airport Coronavirus Response Grant Program funds be used to reimburse charitable contributions or sponsorships?**

**A:** No. Charitable contributions and sponsorships are not an allowable expense. All reimbursements made under the Airport Coronavirus Response Grant Program must comply with 2 CFR part 200, “Uniform Administrative, Cost Principles, and Audit Requirements for Federal Awards.” Section 200.434, “Contributions and Donations” states that contributions and donations, including cash, property, and services, are unallowable.

**Q-U12: Can Airport Coronavirus Response Grant Program funds be used to reimburse economic development efforts?**

**A:** No. Under CRRSA, funds are available for costs related to operations, personnel, cleaning, sanitization, janitorial services, combating the spread of pathogens at the airport, and debt service payments. Economic development does not fall into these categories of eligible costs.

**Q-U13: Can Airport Coronavirus Response Grant Program funds be used to reimburse smaller invoices for items such as groceries for snack rooms or meals for airport personnel?**

**A:** As long as the purchases are for purposes eligible under CRRSA (as described in Q-U1) and comply with 2 CFR part 200, including the requirement to document the costs adequately, small purchases are eligible for reimbursement. However, it can be difficult to document that these items are directly related to airport use. Larger invoices directly related to airport use are easier to review and approve.

**Q-U14: Can Airport Coronavirus Response Grant Program funds be used to reimburse debt service payments that are backed by an approved PFC and paid with PFC funds?**

**A:** No. If PFC funds are available, the PFC funds must be used on any approved PFC project. Airport Coronavirus Response Grant Program funds are not available to be deposited into PFC accounts. In accordance with 14 CFR § 158.39, public agencies cannot hold excess PFC funds in reserve for a future use. In addition, the requirements of 14 CFR part 158 apply for any new projects or changes in scope to existing projects.



**Q-U15: Can Airport Coronavirus Response Grant Program funds be used to reimburse debt service payments that are backed by an approved PFC?**

**A:** Yes. The airport sponsor may supplement with other airport revenue and submit a request for payment under its grant. The invoice summary should show the amount of debt service paid with PFC collections and the amount paid with non-PFC funds. The airport sponsor can submit a request for payment under its grant at the same time it submits an amendment to an approved PFC, which decreases the total collection or deletes an approved project, to its local Airports District Office or Airports Regional Office.

**Q-U16: Can Airport Coronavirus Response Grant Program funds be used to reimburse the defeasement of debt backed by an approved PFC?**

**A:** Yes. The airport sponsor can defease the debt with non-PFC funds and submit a request for payment under its grant. However, the airport sponsor must amend its PFC approval, in accordance with the requirements of 14 CFR § 158.37, to reflect the change. A PFC amendment that decreases the total PFC revenue or deletes an approved project does not require airline consultation nor a public comment period. An airport sponsor can submit a request for payment under its grant at the same time it submits an amendment to an approved PFC to its local Airports District Office or Airports Regional Office.

## Questions on Grant Application and Agreement

**Q-GA1: Is a grant application required to receive the Airport Coronavirus Response Grant Program funds?**

**A:** Yes. After Airport Coronavirus Response Grant Program awards are announced, FAA personnel will reach out to each airport sponsor to provide an opportunity to apply for grants. An airport sponsor may contact its Airports District Office or Airports Regional Office if it seeks specific guidance on its grant application.

**Q-GA2: When will grant applications be available and how long after filing a complete application should an airport sponsor expect to receive a grant?**

**A:** FAA will provide these applications to airport sponsors through the local Airports District Office or Airports Regional Office shortly after Airport Coronavirus Response Grant Program awards are announced. FAA anticipates providing a grant agreement for execution within days of receiving a complete application.

**Q-GA3: Will FAA use a standard grant application form or one specifically designed for this program?**

**A:** FAA will use the SF-424, *Application for Federal Assistance*.

**Q-GA4: Is there a deadline for submitting an application for an Airport Coronavirus Response Grant Program grant?**

**A:** Yes. The deadline to apply for a grant is June 30, 2021. After that date, FAA will reallocate any unobligated funds to primary airports based on CY 2019 enplanements as indicated under CRRSA. (See Q-F1)

**Q-GA5: If an airport sponsor owns or operates multiple airports, may Airport Coronavirus Response Grant Program funds be pooled?**

**A:** No. An airport sponsor will need to apply for a separate grant for each airport under its control.

**Q-GA6: Is there a deadline by which funds must be used?**

**A:** Yes. The budget period for the Airport Coronavirus Response Grant Program is four years. Pursuant to 2 CFR § 200.403(h), a sponsor may charge to the grant only allowable costs incurred during the budget period.

**Q-GA7: Will FAA use a standard AIP grant agreement or one specifically designed for the Airport Coronavirus Response Grant Program?**

**A:** FAA will provide a simplified Grant Agreement shortly after it receives an application. This simplified agreement includes the requirements under CRRSA and makes funds immediately available for expenses, other than airport development, including payroll, debt service, utility expenses, service contracts, and supplies.

**Q-GA8: Does an Airport Coronavirus Response Grant Program grant agreement require an airport sponsor to obligate itself to the standard set of FAA Airport Sponsor Grant Assurances?**

**A:** Generally, no. If an airport sponsor uses its grant for operational expenses or debt service payments, the standard FAA Airport Sponsor Grant Assurances do not apply. These grants remain subject to audit, reporting, records retention, and other requirements under 2 CFR part 200 like other Federal grant funding. Other Federal statutes may also apply, such as 49 U.S.C. 40103(e), which prohibits the grant of an exclusive right to conduct any type of aeronautical activity at an airport, and Title VI of the Civil Rights Act, which prohibits discrimination on the basis of race, color, or national origin. If an airport sponsor uses its grant for new airport development, additional requirements apply (see Q-U5). Additionally, grant funds may be used only for the capital and operating expense of the airport. Examples of expenditures that FAA has found to be allowable are provided in the [FAA Revenue Use Policy](#), as clarified by [Information for Airport Sponsors Considering COVID-19 Restrictions or Accommodations](#). CRRSA does not, however, void assurances made in prior grant agreements; therefore, a sponsor's pre-existing grant assurances and Federal obligations continue to apply.

**Q-GA9: How long do the grant assurances remain in effect for an Airport Coronavirus Response Grant Program grant agreement?**

**A:** The grant assurances remain in effect for four years from the date of acceptance of the grant offer, which is consistent with the budget period.

**Q-GA10: How does an airport sponsor use Airport Coronavirus Response Grant Program funds for airport development?**

**A:** Funding eligibility under CRRSA for airport development is limited (as discussed in Q-U5). However, an airport sponsor seeking to use its grant funds for eligible near-term airport development may amend its initial Grant Agreement and execute a Development Addendum. This process ensures that a sponsor understands the additional reviews and requirements involved (as discussed in Q-U5). An airport sponsor should be able to complete airport development projects within the four-year budget period of its initial grant. An airport sponsor should not delay or forgo expenditure of grant funds for ongoing airport operational expenses and debt service payments, which are the primary purposes of funds under CRRSA.

**Q-GA11: Should an airport sponsor request its full Airport Coronavirus Response Grant Program award amount even if it intends to use a portion of those funds for airport development?**

**A:** Yes. An airport sponsor should include the full award amount in its grant application. All funds then would be available immediately for operational expenses or debt service payments. An airport sponsor can later request a Development Addendum and use some of those funds for airport development.

**Q-GA12: What information is required for a Development Addendum?**

**A:** An airport sponsor seeking to use its grant funds for airport development should be prepared to provide its local Airports District Office or Airports Regional Office with the following information:

- Application form (Application for Federal Assistance, SF-424) for the proposed development project;
- A description of project;
- Estimated costs; and
- Timeline for completion.

An airport sponsor should also complete the following steps for the airport development project:

- Complete any standards, airspace, and environmental reviews or approvals including airport geometry assessments, if applicable;
- Complete any other approvals required for the development with the FAA and other agencies;
- Ensure the proposed development is consistent with the approved Airport Layout Plan (ALP) and depicted on the ALP;
- Initiate safety-risk and construction phasing reviews, if applicable; and
- Bid the project to determine the amount to be amended from the initial Grant Agreement and added to the Development Addendum.

FAA recognizes that some proposed development projects have completed many or all of these steps, and those projects may be most suitable for a Development Addendum. Grant agreements for these proposed development projects will include additional requirements as described in Q-U5.

**Q-GA13: Is a Development Addendum required for maintenance on existing airport facilities (e.g., a terminal building)?**

**A:** Replacing components of a facility in-kind (dimension and material), in the same footprint, does not require a Development Addendum. Projects may include replacing roofing, carpet, or lighting. However, FAA would issue a Development Addendum if an existing facility is improved or expanded provided that project is eligible under CRRSA.

**Q-GA14: Do prevailing wage requirements apply to contract expenses reimbursed with Airport Coronavirus Response Grant Program funds?**

**A:** Grants under the Airport Coronavirus Response Grant Program are subject to the requirements of 49 U.S.C. 47112(b). Therefore, any contract for more than \$2,000 involving labor for airport construction or repair, carried out under a Grant Agreement or Development Addendum, requires contractors to pay labor minimum wage rates as determined by the Secretary of Labor under 40 U.S.C. 3141–3144, 3146, and 3147.

**Q-GA15: Does FAA's Buy American requirement apply to the Airport Coronavirus Response Grant Program?**

**A:** Yes. Grants under the Airport Coronavirus Response Grant Program are subject to the requirements of 49 U.S.C. 50101, and grant agreements and addendums include Buy American requirements for all projects. The Buy American provision does not apply to operational expenses (as defined in Question Q-U2) and debt service payments.

**Q-GA16: Are there annual financial reporting requirements associated with the Airport Coronavirus Response Grant Program?**

**A:** Yes. In accordance with 2 CFR § 200.328, an airport sponsor must submit annually an SF-425, Federal Financial Report, for each open Grant Agreement or Development Addendum. This report is due by December 31 of each year and should cover the period from October 1 through September 30, consistent with the Federal fiscal year. An airport sponsor with a Development Addendum must also submit annually an SF-271, Outlay Report and Request for Reimbursement for Construction Program by December 31 of each year.

**Q-GA17: Are there any requirements related to mandating masks inside airports associated with the Airport Coronavirus Response Grant Program?**

**A:** Yes. Under the [Executive Order 13998, Promoting COVID-19 Safety in Domestic and International Travel](#), (Executive Order 13998) issued on January 21, 2021, the Secretary of Transportation must require masks to be worn in compliance with the [CDC Order](#) in airports, consistent with applicable law. To accomplish this requirement, and to achieve the legislative purposes of preventing and responding to coronavirus disease 2019 (COVID-19), each Airport Coronavirus Response Grant Program grant agreement will include a special condition that the airport sponsor implement a policy requiring all persons wear a mask, in accordance with the [CDC Order](#) and [TSA Security Directive](#), as applicable, at all times while in all public areas of the airport property, except to the extent exempted under those requirements. The CDC and TSA requirements exempt certain categories of persons from the mask-wearing mandate: a child under the age of two, a person with a disability who cannot wear or safely wear a mask because of the disability, or a person for whom wearing a mask would create a risk to workplace safety, health, or job duties. This special condition requires the airport sponsor continue to require masks until Executive Order 13998 is no longer effective. Failure to comply with this special condition may result in suspension of payments or termination of the grant, consistent with 2 CFR §§ 200.339 and 200.340. For additional Department of Transportation guidance on masks, see <https://www.transportation.gov/safety/mask-travel-guidance>.

## Questions on Invoicing and Payments

**Q-11: How will an airport sponsor submit payment requests for Airport Coronavirus Response Grants for payment requests other than for concession relief?**

**A:** FAA will use the existing U.S. Department of Transportation Delphi eInvoicing system for payment requests. Payment processes for concession relief grants are discussed starting at Q-CR1, below. FAA will review payment requests manually. An airport sponsor may submit only a detailed invoice summary with its payment request. The invoice summary should include the:

- Grant Number
- Airport Name
- Airport City
- Airport Location Identifier
- Services Rendered Dates
- Invoice Paid Date
- Vendor Name
- Billed Amount
- Payment Request Amount
- Short summary of expenses billed, including, for example:
  - Payroll
  - Utilities (electric, water, phone)
  - Service contracts (include type of work)
  - Goods Purchase (include a list of all items purchased)
  - Debt Service Payment (identify whether this is a semi-annual bond payment or monthly payment into a debt service reserve fund)
  - Other (explanation of costs and how they are eligible and related to the airport)

The invoice summary should include enough detail to permit FAA to verify compliance with the FAA's Revenue Use Policy. Sponsors must be prepared to submit any invoices, upon request, during the review process as well as retain those invoices and other supporting documentation for three years after the grant is closed as required by 2 CFR § 200.334.

**Q-I2: If, during review of a request for payment, FAA requires additional documentation to confirm the eligibility of a particular expense, what documentation could be requested?**

**A:** Examples of underlying payment request documentation are:

- Invoices (demonstrating that the goods or services provided directly relate to the airport);
- Bills (demonstrating that the goods or services provided directly relate to the airport);
- Payroll reports from the payroll system of record;
- General ledger reports and subsidiary ledger reports for services provided by the sponsor;
- Current and approved indirect cost rate agreement; or
- Most recently approved local or statewide cost allocation plan.

**Q-I3: Can an airport sponsor request 100 percent of the available Airport Coronavirus Response Grant Program funds and use the funds to pay expenses over the next several months?**

**A:** No. An airport sponsor must submit payment requests for incurred expenses only. Requesting funds for reimbursement prior to incurring the invoiced expense is not consistent with the [FAA's Payment Policy](#) and will result in an improper payment that may have to be repaid.

**Q-I4: Should airport sponsors submit separate payment requests for expenses related to FAA contract tower operations?**

**A:** Yes. Separate payment requests should be submitted for FAA contract tower operations expenses to ensure these payments are processed against the correct funds. Additional information regarding FAA contract tower funding is provided in Q-CT2 and Q-CT3.

### Questions on Grant Closeout

**Q-C1: What are the procedures for closing out an Airport Coronavirus Response Grant for non-development expenses?**

**A:** An airport sponsor will submit a comprehensive narrative report via the U.S. Department of Transportation Delphi eInvoicing system. The narrative report will: (a) summarize the non-development expenses covered under the grant and the associated amounts; (b) certify all expenses were incurred in accordance with the [FAA's Revenue Use Policy](#) and [2 CFR part 200](#); (c) certify that any equipment or services were procured in a manner consistent with the terms of the grant; (d) certify that operational expenses were incurred on or after January 20, 2020; (e) certify that debt service payments were due on or after December 27, 2020; and (f) submit a completed Standard Form 425, Federal Financial Report. Approval of the final payment request will follow a review of the airport sponsor's closeout report. A [sample Airport Coronavirus Response Grant Program Closeout Report](#) is available.

**Q-C2: Will an airport sponsor be notified that its Airport Coronavirus Response Grant is closed?**

**A:** An airport sponsor will receive a grant closeout letter from FAA stating the grant has been closed. After the grant is closed, it remains subject to audit. The airport sponsor must retain grant documentation for three years after the grant is closed as required by 2 CFR § 200.334.



### Questions on Environmental Review

**Q-E1: Are there any environmental review requirements associated with non-construction grants for airport operating expenses and debt service payments?**

**A:** No. These types of grants have no potential to impact the environment and are not subject to NEPA review.

**Q-E2: Are there any environmental review requirements associated with projects funded under a Development Addendum?**

**A:** Yes. FAA will conduct environmental review as necessary consistent with the requirements of the Council on Environmental Quality (CEQ) regulations in 40 CFR parts 1500 through 1508 and the FAA's NEPA implementation procedures. An airport sponsor should contact its Airports District Office or Airports Regional Office to determine the appropriate scope and level of environmental analysis.

## **Questions on Administration under the State Block Grant Program**

**Q-SB1: What is the State Block Grant Program (SBGP)?**

**A:** In 1987, Congress authorized FAA to use State block grants to provide AIP funds to airport sponsors. Through the State Block Grant Program (SBGP), FAA provides funds directly to States that participate in the program. In turn, SBGP participants fund and oversee AIP projects to non-primary commercial service, reliever, and general aviation airports. The program currently includes the following 10 States: Georgia, Illinois, Michigan, Missouri, New Hampshire, North Carolina, Pennsylvania, Tennessee, Texas, and Wisconsin.

**Q-SB2: How will FAA Administer CRRSA funding for States participating in the SBGP?**

**A:** The FAA Airport Improvement Program Branch (APP-520) will use its existing relationships with the States participating in the SBGP for administration of the Airport Coronavirus Response Grant Program. These participants have relationships with airport sponsors within their States and currently provide grant management and internal controls. Leveraging this infrastructure will facilitate efficient and expedient distribution of funds.

**Q-SB3: Will FAA Regional and Airport District Offices remain the points-of-contact for the Airport Coronavirus Response Grant Program?**

**A:** Yes. States participating in the SBGP should continue to work with their local Airports District Office or Airports Regional Office throughout implementation and administration.

**Q-SB4: Do Airport Coronavirus Response Grant Program funding allocations work differently for the SBGP?**

**A:** No. FAA will calculate each airport sponsor's allocation based on formulas in CRRSA. FAA will announce these award amounts along with all awards under the Airport Coronavirus Response Grant Program.

**Q-SB5: How much CRRSA funding may States participating in the SBGP distribute?**

**A:** CRRSA provides for specific allocations to each airport sponsor. FAA will aggregate the amounts announced for each airport sponsor into respective State awards.

**Q-SB6: How may States participating in the SBGP allocate the Airport Coronavirus Response Grant Program funds?**

**A:** States participating the SBGP must make sub-awards to each airport sponsor based on that sponsor's allocation under CRRSA. FAA expects States to make these sub-awards on an expedited basis, and for airport sponsors to spend funds quickly, to reduce the adverse impacts of the current pandemic. States must follow 2 CFR part 200 requirements for grant awards and sub-awards. Funds not expended within the four-year budget period are subject to recovery by FAA.

- Q-SB7: What application and grant agreement will be used for sub-grants?**  
**A:** States participating in the SBGP will use a streamlined application and grant agreement process similar to what FAA is using for all grants under the Airport Coronavirus Response Grant Program. FAA will provide States with template documents after these grants are announced.
- Q-SB8: What if my State legislature needs to approve the acceptance of CRRSA funding?**  
**A:** FAA recommends that States participating in the SBGP use their usual State processes to approve, accept, and administer Federal funds.
- Q-SB9: Can grants under the Airport Coronavirus Response Grant Program be sub-awarded to airport sponsors that had previously opted out of the SBGP?**  
**A:** No. States participating in the SBGP do not have to make sub-awards to airport sponsors that opted out in FY 2021 or do not participate in the SBGP. FAA will administer grants for those airport sponsors.
- Q-SB10: What are the reporting requirements for the Airport Coronavirus Response Grant Program?**  
**A:** States participating in the SBGP will continue the current practice of providing sub-award reporting information on grants to FAA upon request.
- Q-SB11: Will grants under the Airport Coronavirus Response Grant Program require end-of-fiscal-year reporting like other AIP funding?**  
**A:** Yes. Airport Coronavirus Response Grant Program funds will be included in the Annual Report of Federal Funding at the end of FY 2021.
- Q-SB12: How will payment requests be submitted for the Airport Coronavirus Response Grant Program?**  
**A:** FAA will use the existing U.S. Department of Transportation Delphi eInvoicing system for payment requests. States participating in the SBGP will continue the current practice of retaining all underlying payment request documentation and complete records.
- Q-SB13: Will FAA audit the Airport Coronavirus Response Grant Program administered by States participating in the SBGP?**  
**A:** Yes. FAA will include audits of grants under the Airport Coronavirus Response Grant Program in its annual audit process.
- Q-SB14: What documentation is needed for SBGP Airport Coronavirus Response Grant Program drawdown requests?**  
**A:** States participating in the SBGP should provide the same documentation outlined in Q-I1 and Q-I2. States participating in the SBGP must ensure invoices contain only eligible items under CRRSA, as detailed throughout this document.

## **Questions on Funding for Airports in the FAA Contract Tower Program**

**Q-CT1: What is the FAA Contract Tower Program?**

**A:** Contract towers are air traffic control towers that are staffed by employees of private companies rather than by FAA employees. The FAA Contract Tower (FCT) Program was established in 1982 to allow the agency to contract out the operation of certain towers. FAA admits airports into this program after an eligibility review. More information about the FCT Program is available at [https://www.faa.gov/about/office\\_org/headquarters\\_offices/ato/service\\_units/mission\\_support/faa\\_contract\\_tower\\_program/](https://www.faa.gov/about/office_org/headquarters_offices/ato/service_units/mission_support/faa_contract_tower_program/).

**Q-CT2: How can airport sponsors that participate in the FAA Contract Tower Program use the funds they receive?**

**A:** Under CRRSA, airport sponsors of non-primary airports that participate in the FAA Contract Tower Program may use these funds to cover any lawful costs associated with supporting their FAA contract tower operations (such as payroll, utilities, service contracts, and items generally having a limited useful life, including personal protective equipment and cleaning supplies).

**Q-CT3: Can airport sponsors that participate in the FAA Contract Tower Program use other CRRSA funds for costs related to contract tower operations?**

**A:** Yes. Airport sponsors may use other CRRSA funding to support contract tower operations, personnel, cleaning, sanitization, janitorial services, combating the spread of pathogens, and debt service payments. However, they cannot use the funding received specifically for contract towers for any other purpose.

## Questions on Funding for Concession Relief

**Q-CR1: How does an airport sponsor claim its allocation available to provide relief to airport concessions?**

**A:** An airport sponsor seeking to use CRRSA funds to provide relief from rent and minimum annual guarantee (MAG) obligations to eligible airport concessions may apply for that allocation in an application for an Airport Coronavirus Response Grant Program grant agreement. FAA will transmit a concession relief grant application for each primary airport receiving Airport Coronavirus Response Grant Program grants. An airport sponsor wishing to decline its Airport Coronavirus Response Grant Program concession relief grant(s), should not submit application(s), but rather notify its ADO of its intent to decline.

**Q-CR2: How do airport sponsors provide relief to airport concessions?**

**A:** If an airport sponsor accepts its CRRSA allocation for concession relief, the sponsor must provide relief from rent and MAG to on-airport car rental, on-airport parking, and in-terminal airport concessions (as defined in 49 CFR part 23) (collectively, “concessions”). CRRSA requires an airport sponsor taking a concession relief grant to provide such relief on a proportional basis, described at Q-CR15, until the sponsor has provided relief equaling the total allocation amount. The airport sponsor may retain up to 2 percent of the allocation amount for relief administration. Only relief associated with rent due for concession occupancy or commercial use after December 27, 2020 (the date of CRRSA was enacted) is eligible for grant payment.

**Q-CR3: What if State laws, local laws, or applicable trust indentures prohibit an airport sponsor from providing relief from rent and MAG to airport concessions?**

**A:** If an airport sponsor is prohibited from providing relief from rent and MAG, it should decline the allocated funds before executing an Airport Coronavirus Response Grant Program concession relief grant agreement.

**Q-CR4: How does an airport sponsor allocate concession relief funds among its concessions?**

**A:** An airport sponsor must provide this relief to each airport concession in an amount that reflects each eligible airport concession's proportional share of the total amount of rent and MAG of all eligible airport concessions at the airport. This is a set of ratios of each eligible concession's contribution to the total amount of rent and MAG income remitted to the airport by all members of the eligible population of remitting concessions. An airport sponsor must account for proportionality on 100% of the grant allocation, but it may reserve up to 2% of the allocation to administer the relief. An airport sponsor does not have to demonstrate proportionality for grant relief provided beyond 100% of the grant allocation. Eligible concessions must be subject to a valid agreement to remit rent or MAG at the specific airport after December 27, 2020, and remain a going concern (an entity that is either providing minimum acceptable services, or is otherwise ready, able and available to provide ongoing minimum acceptable services as agreed to with the sponsor). Guidance on planning each airport's associated concession relief grant payment request is provided at Q-CR15, below.

**Q-CR5: Are there other requirements for an airport sponsor providing relief to its concessions?**

**A:** Airport sponsors must prioritize relief from rent and MAG to minority-owned businesses to the extent permissible under CRRSA. Prioritization should include timely, individual consultation with each Airport Concession Disadvantaged Business Enterprise (ACDBE), and reasonable consideration with regard to timing or structure of prorated relief. Consultation with ACDBEs should reach the airport minority-owned businesses.

**Q-CR6: Can an airport sponsor recover its administrative expenses for providing rent or MAG relief to airport concessions?**

**A:** Yes. An airport sponsor may retain up to 2 percent of its allocation for relief administration.

**Q-CR7: Are there requirements for an airport concession to obtain rent or MAG relief from an airport sponsor?**

**A:** Yes. An airport concession must certify to the airport sponsor that it has not received a second draw or assistance for a covered loan under section 7(a)(37) of the Small Business Act (15 U.S.C. 636(a)(37)) that has been applied toward rent or MAG. Additionally, an airport concession receiving relief from an airport sponsor may not apply for a covered loan under 15 U.S.C. 636(a)(37). Airport sponsors should collect these certifications and retain them for their records in the same manner that they retain invoices associated with its general Airport Coronavirus Response Grants. A [sample Airport Concession Certification](#) is available.

If an airport sponsor becomes aware that a concession is ineligible for concessions relief under an Airport Coronavirus Response Grant, the airport sponsor is responsible for addressing any improper relief benefit. Federal funds may not be expended contrary to CRRSA requirements. The airport sponsor must notify the FAA at CARESAirports@faa.gov as soon as practicable after becoming aware of the improper relief benefit. It also must allocate an amount equal to the improper relief benefit among remaining eligible airport concessions in an amount that reflects each eligible airport concession's proportional share of the total amount of rent and MAG of all eligible airport concessions at the airport, and it must re-submit the information submitted for its payment request (see Q-CR15) showing the allocation correction. The airport sponsor also may require re-payment of the improper relief benefit.

**Q-CR8: Can an airport sponsor mix its Airport Coronavirus Response Grant Program allocations across its primary airports receiving a concession relief allocation?**

**A:** No. Each airport sponsor receiving Airport Coronavirus Response Grant Program allocations for concession relief must use such funds designated for concession relief at each primary airport in a manner consistent with the conditions and requirements of CRRSA.

**Q-CR9: Can an airport sponsor mix its Airport Coronavirus Response Grant concession relief allocation with its general Airport Coronavirus Response Grant allocation?**

**A:** No. Each airport sponsor receiving Airport Coronavirus Response Grant Program allocations for concession relief must use such funds to forgive rent from concessions and may retain up to 2 percent for relief administration. Conversely, it must submit *costs* for reimbursement from its Airport Coronavirus Response Grant general allocation.

**Q-CR10: How can an airport sponsor determine a base-line time period upon which to calculate proportionality for rent relief amongst eligible concessions?**

**A:** Once an airport sponsor has determined its population of eligible concessions, it should calculate each concession's appropriate proportional share, using an appropriate base-line time period. The base-line time period should be relevant to the expected duration of relief to be provided, but in no case should the base-line time period be after the 1<sup>st</sup> quarter of 2020.

**Q-CR11: Can an airport sponsor apply some adjustments to its proration of rent relief due to special circumstances?**

**A:** Yes. There are certain circumstances justifying adjustments to the rent relief proration. For example, these include:

- Only concessions paying rent at each airport for occupancy or commercial-service activity after December 27, 2020 can receive CRRSA relief. As such, a concession that is no longer a going concern at the airport should not be included in the proration calculation, or in the total rent income base-line, unless a new entity has replaced a departed entity with a similar location and activity.
- If a current concession operating and paying rent at the airport replaced a concession operating in the base-line time period, in a like manner, the relief proportion should be applied to the new concession.
- If a current concession operating and paying rent at the airport replaced a concession operating in the base-line time period, in a like manner, but with differing lease rates or square footage, the sponsor may make reasonable adjustments to its proportional ratios to reflect the difference.
- If a concession is replaced in a similar location, but as different service or on significantly differing business terms, the sponsor should explain reasonable adjustments it makes for such circumstances when requesting reimbursement.

Sponsors should make short comments relevant to simple adjustments per the examples above. More complex adjustments for multi-factor circumstances, such as change in tenant, and change in rate and change in use-type, etc., may require more explanation. See Q-CR15 for examples of a reimbursement request comments.



**Q-CR12: Can an airport sponsor apply some requirements upon concessions, and accept Airport Coronavirus Response Grant Program grants for concession relief?**

**A:** Yes. Sponsors may include some valuable considerations in exchange for rent relief, even if that rent relief is to be funded by Airport Coronavirus Response Grant Program concession relief grants, provided these considerations are equitably applied to all concessions at the airport. For example:

- Sponsors may require certifications that each eligible concession remains a going concern and be fully ready, able and available to provide relevant services, regardless of operating levels of service.
- Sponsors may include phased re-opening schedules and expect cooperation with regard to varying levels of service during periods of changing demand.
- Sponsors may provide rent relief to a concession that is in arrears for rent, if the concession is providing minimum acceptable services, or demonstrating that it is ready, able and available to provide minimum acceptable services, and the airport sponsor elects to provide forbearance.

Sponsors should not request concession relief reimbursement for concessions that are not a going concern. Sponsors should not impose or induce lease terms unrelated to those valuable and necessary considerations to enhance coordination of operations during the pandemic and recovery. Sponsors should not compel new lease agreements, or extensions to leases beyond the duration of occupancy correlated to the amount of rent relief provided.

**Q-CR13: Can an airport sponsor receive Airport Coronavirus Grant Program grant payment to cover concession rent relief that it decided to provide before December 27, 2020?**

Yes, but only to the extent that such relief covers forgiven payments of rent or MAG for periods of occupancy and/or commercial-use after December 27, 2020, and only to the extent that the relief among concessions at each airport is proportional.

**Q-CR14: Should an airport sponsor consult with its concession stakeholders on its relief program?**

Yes, the sponsor should consult with its concession community, generally, to gather suggestions, and preview its plan. In addition, it should conduct one-on-one consultation with ACDBEs. The sponsor cannot alter proportionality of relief provided, but may adjust timing or format of relief.

**Q-CR15: How can an airport sponsor plan its concession relief program in order to hasten FAA’s approval of Airport Coronavirus Response Grant Relief concession relief grant payments?**

**A:** FAA will use the existing U.S. Department of Transportation Delphi eInvoicing system for concession relief payment requests. FAA will review payment requests manually. Sponsors should identify:

- Each concession name, including business legal name and trade (or doing business as) name;
- Whether concession is eligible for rent relief;
- ACDBE concessions;
- a one-on-one consultation date (see Q-CR-14);
- the date of consultation with remaining eligible concessions (see Q-CR-14);
- the base-line time period used to calculate proportional share (see Q-CR10);
- any consideration received in exchange for relief (see Q-CR12);
- date of airport concession certification (see Q-CR7);
- any concession that certified to taking a PPP second draw loan, and whether that PPP second draw loan was used for rent or MAG, if applicable (see Q-CR7); and
- any special circumstances or adjustments made to the allocation (see Q-CR11).

A payment request should include the information identified above and the administration fee retained by the sponsor, not to exceed 2% of the allocation. A [sample Airport Concessions Relief Plan](#) is available.

An airport sponsor may submit a payment request for the full or partial amount on the concessions rent relief grant. The plan should demonstrate that the total amount of rent relief provided by the sponsor equals the grant amount or more. When requesting the full grant amount, an airport sponsor also should include a signed SF-425, *Federal Financial Report*, and signed closeout report. A [sample Airport Coronavirus Response Grant Program Closeout Report](#) is available. Sponsors must be prepared to submit additional documentation, upon request, during the review process as well as retain all supporting documentation for three years after the grant is closed as required by 2 CFR § 200.334.

**Q-CR16: Can an airport sponsor exclude a newly operating concession from the relief allocation?**

**A:** An airport sponsor may exclude from the rent relief allocation any concession that began operations at the airport after November 24, 2021, the date this guidance was published. The FAA presumes new entrants have negotiated terms that account for COVID-19 pandemic.

**Q-CR17: How does an airport sponsor handle a partially unexpended rent relief credit?**

**A:** The FAA acknowledges, in limited circumstances, an eligible concession may receive benefit of only a portion of its proportional allocation and be unable to receive benefit from the rest (e.g., the concession ceases operations at the airport before the full rent credit is expended). The sponsor must allocate proportionally any remaining funds among other eligible concessions. In these circumstances, the sponsor should update its airport concessions rent relief plan explaining the changed circumstances and adjusted allocations and submit it to the FAA at [CARESAirports@faa.gov](mailto:CARESAirports@faa.gov) as soon as practicable.

### Questions on Workforce Retention

**Q-WF1: Are there specific workforce retention requirements for accepting Airport Coronavirus Response Grant Program funds?**

**A:** Yes. A sponsor of a small, medium, or large hub airport must continue to employ, through February 15, 2021, at least 90% of the number of individuals employed (after making adjustments for retirements or voluntary employee separations) as of March 27, 2020. This requirement is an extension of the workforce retention requirement under the CARES Act. Airport sponsors must certify compliance with the CARES Act and CRRSA workforce retention requirements at the time of grant execution. The workforce retention requirement does not apply to non-hub or non-primary airports.

**Q-WF2: When do small, medium, and large hub airport sponsors report their respective compliance with the employee retention requirement?**

**A:** Provided an airport sponsor is current with its workforce retention reporting under the CARES Act, it must report only employment totals as of February 15, 2021, by no later than March 1, 2021.

**Q-WF3: Where should CRRSA workforce retention reports be submitted?**

**A:** CRRSA workforce retention reports should be submitted to [CARESAirports@faa.gov](mailto:CARESAirports@faa.gov). Please include “Workforce Retention Report” and your airport’s city, State, and airport location identifier in the email subject line.

**Q-WF4: What information must be included in a workforce retention report and certification?**

**A:** That report and certification should include the number of full-time equivalent (FTE) employees working at the airport as of March 27, 2020, as the baseline comparison. Airport sponsors do not need to count contractors providing services other than airport management, tenants, or concessionaires. Airport sponsors may make adjustments for employees who perform duties at both the airport and other facilities operated by the airport sponsor. Airport sponsors also may make adjustments for retirements or voluntary employee separations when calculating the workforce retention percentage. If an airport sponsor has unique circumstances (such as using seasonal employees or contractors for airport management or operations), it should report that information in as much detail as possible in the initial report so any subsequent retention reporting can be substantiated.

**Q-WF5: What format is required for CRRSA workforce retention reports?**

**A:** There is no particular format for reporting baseline and quarterly workforce retention counts. Airport sponsor personnel with appropriate knowledge or authority, such as the human resources director, chief financial officer, or payroll officer should validate the information.

**Q-WF6: Are payroll records or any other documentation required for workforce retention reports?**

**A:** Airport sponsors do not need to submit payroll records. However, airport sponsors must retain all supporting documentation for three years after the grant is closed as required by 2 CFR § 200.334.

**Q-WF7: Are waivers from the CRRSA workforce retention requirement available?**

**A:** The Secretary of Transportation may waive the workforce retention requirement if the Secretary determines that the sponsor is experiencing economic hardship as a direct result of the requirement, or that the requirement reduces aviation safety or security. To request a waiver of the CRRSA workforce retention requirement, an airport sponsor should send a waiver request to CARESAirports@faa.gov no less than 30 days before the quarterly report due date. The waiver request should come from a person authorized to sign AIP grants and include how the workforce retention requirement causes a direct economic hardship on the airport or reduces aviation safety or security. The airport sponsor should include any additional documentation that supports its request. FAA will respond expeditiously.

**Q-WF8: What are the consequences for failing to meet workforce retention reporting requirements?**

**A:** If a sponsor of a small, medium, or large hub airport does not meet the workforce retention reporting requirements under either the CARES Act or CRRSA, reimbursements for grants under the Airport Coronavirus Response Grant Program may be suspended. FAA will continue to work with the sponsor to meet these reporting requirements, but continued non-compliance may result in termination of the grant and recovery of reimbursements.