

Topic	Status in FY25	Notes
Single Application Limit	New (explicit)	Applicants may now submit only one application per entity. If more than one is submitted, only the last will be reviewed.
Use of Up to Three Plans	New	Implementation Grant applicants may now combine up to three plans to meet Action Plan requirements.
Supplemental Planning Without Own Plan	New/Expanded Guidance	Applicants may apply without their own plan only if a higher-level jurisdiction has a valid Action Plan and they show coordination.
Underserved Community Definition	New	For the first time, "Underserved Community" is explicitly defined to match the statutory definition of Areas of Persistent Poverty under 49 U.S.C. § 6702(a)(1).
Duplicative Planning Applications	New (clarified eligibility rule)	Applications that duplicate existing SS4A-funded Action Plan efforts in the same geography may be deemed ineligible.
Updated Pre-Application Review Process	Expanded	FY25 allows a pre-application eligibility review (due May 9) to check if a plan meets the Action Plan requirements—specific to Implementation Grants.
Ineligible Plan Types	Now explicitly listed	State Strategic Highway Safety Plans (SHSP), CVSPs, PTASPs, etc., are now explicitly ineligible to meet Action Plan requirements.
Action Plan Timeframe	New timeframe specified	Eligible plans must be finalized or updated between 2020 and June 26, 2025.
Insular Area Match Waiver	Explicitly codified in FY25	Matching requirements are waived for awards <\$200,000 for Guam, U.S. Virgin Islands, American Samoa, CNMI.
MPO eligibility	Still eligible and reaffirmed	Always eligible, but FY25 clarifies MPOs may serve as lead for multijurisdictional groups
States not eligible	Reaffirmed and more explicit	States were previously ineligible but FY25 provides clearer language
Non-profit eligibility	Clarified	Non-profits must be created by state law and have similar responsibilities to local governments
Action Plan requirements	Tighter guidance and format	Previous NOFOs referred to eligibility worksheets but were less structured
Demonstration Activities	More structured requirements	FY25 requires evaluation plan, expected benefits, and tie-in to Action Plan
Local Match	No Change	80/20 federal-local match requirements (except waivers for certain areas)
Eligible Applicants	No Change	MPOs, political subdivisions of a state, Tribal governments, multijurisdictional groups. Disqualification of states and state DOTs as direct applicants.
Application for Implementation	No Change	Requirement for a finalized Action Plan to apply for Implementation Grants.