



December 2024

BRIDGE INVESTMENT PROGRAM

DOT Should Refine Processes to Improve Consistency

GAO Highlights

Highlights of [GAO-25-107227](#), a report to congressional committees

Why GAO Did This Study

Many of the bridges that Americans drive over each day need repairs. To help repair and replace these bridges, the Infrastructure Investment and Jobs Act established a new grant program—the Bridge Investment Program. The act provided \$12.5 billion over 5 years for the program.

The act also includes a provision for GAO to review DOT's processes for evaluating and selecting Bridge Investment Program projects for award. This report examines the extent to which DOT's three primary processes related to the program—soliciting, evaluating, and selecting grants—align with a leading practice and relevant federal regulations and DOT guidance for discretionary grant programs.

GAO reviewed DOT's notice of funding opportunity, evaluation plan, and documentation for the Bridge Investment Program fiscal year 2022 evaluation process—the only complete funding round at the time of GAO's review. GAO analyzed application and award data; and interviewed DOT officials and 20 applicants selected to achieve a mix of eligibility and selection status, among other factors. GAO reviewed evaluation documents for 45 of 388 applications, selected to include a mix of award status, evaluation ratings, and applicant type.

What GAO Recommends

GAO is making two recommendations to DOT to improve instructions for reviewers on how to conduct and document (1) evaluations of applications and (2) quality control reviews. DOT concurred with the recommendations.

View [GAO-25-107227](#). For more information, contact Elizabeth Repko at (202) 512-2834 or repkoe@gao.gov.

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DOT Should Refine Processes to Improve Consistency

What GAO Found

For fiscal year 2022, the U.S. Department of Transportation (DOT) awarded \$2.4 billion to 37 bridge projects through a new grant program—the Bridge Investment Program. DOT's process for soliciting grants for this program fully aligned with a leading practice for communicating with applicants and helped applicants familiarize themselves with the new program and its requirements. Specifically, DOT held webinars, posted frequently asked questions, and set up a dedicated email address to answer applicant questions. The 20 applicants GAO spoke with generally found DOT's communication to be useful.

The Brent Spence Bridge, between Kentucky and Ohio, Received a Fiscal Year 2022 Bridge Investment Program Grant



Source: Sherman Cahal/stock.adobe.com. | GAO-25-107227

However, in its first year implementing the Bridge Investment Program, DOT's processes for evaluating and selecting grants did not fully align with federal regulations and DOT guidance for discretionary grant programs. These DOT processes aligned with some aspects of the relevant regulations and guidance. This included developing and implementing a process to rate each application and documenting selection decisions. However, GAO found that, for fiscal year 2022, DOT did not

- consistently document its evaluation of applications against the merit review criteria;
- document that it had reached consensus on all ratings during the quality control review, where a second reviewer verifies the ratings and narratives for each application; or
- notify unsuccessful applicants about their award status.

DOT has since begun notifying unsuccessful applicants about their award status but has not taken action to improve instructions for reviewers on how to conduct and document application evaluations and quality control reviews. Doing so would help DOT more fully ensure that it is implementing the program consistently and making fair grant award decisions in future years.

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Abbreviations

DOT	Department of Transportation
FAQ	Frequently Asked Question
FHWA	Federal Highway Administration
FY	fiscal year
IIJA	Infrastructure Investment and Jobs Act
NOFO	Notice of Funding Opportunity
OMB	Office of Management and Budget

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December 11, 2024

The Honorable Tom Carper
Chairman
The Honorable Shelley Moore Capito
Ranking Member
Committee on Environment and Public Works
United States Senate

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

Many of the bridges that Americans drive over each day need repairs. In 2023, the American Road and Transportation Builders Association reported that over a third of all U.S bridges require major repair work or replacement. According to the same report, drivers cross over structurally deficient bridges 167 million times a day. To help repair and replace bridges, the Infrastructure Investment and Jobs Act (IIJA) established a new discretionary grant program for bridge projects—the Bridge Investment Program—and provided \$12.5 billion over 5 years for this program.¹ The Department of Transportation (DOT) has also identified improving the nation’s bridges as an agency priority goal, specifically to (1) fix the 10 most economically significant bridges and (2) repair the 15,000 in-most-need smaller bridges.²

In a discretionary grant program, like the Bridge Investment Program, awards are competitive, and applications are to be rated against established selection criteria, rather than distributed based on a statutory formula. The Federal Highway Administration (FHWA), part of DOT, administers the Bridge Investment Program. For fiscal year (FY) 2022—

¹Pub. L. No. 117-58, § 11118, 135 Stat. 429, 484 (2021). Of the \$12.5 billion of IIJA provided funding, a total of \$200 million is set aside by the IIJA for Tribal transportation facility bridges under the Tribal Transportation Program.

²Department of Transportation, *FY 2025 | FY 2023 Annual Performance Plan & Report* (Washington, D.C.).

the first round of funding for the program—FHWA awarded \$2.4 billion to 37 projects to repair, replace, preserve, or protect U.S. bridges.

We have raised concerns with DOT’s management of discretionary grant programs since 2011.³ Specifically, we raised concerns related to the consistency and transparency of the application review and selection process across a variety of grant programs and have made multiple recommendations to DOT as a result. For example, in 2024, we found that DOT did not clearly define the criteria used to advance applications or document the rationale for those decisions for the Infrastructure for Rebuilding America discretionary grant program.⁴ We also previously recommended that DOT implement department-wide guidance on how to oversee discretionary grant programs, in particular on documenting key decisions.⁵ We have identified implementing this guidance as a priority recommendation for DOT implementation.⁶

The IJA includes a provision for GAO to review DOT’s process for evaluating and selecting Bridge Investment Program projects for award.⁷ This report assesses the extent to which FHWA’s process for (1) soliciting Bridge Investment Program applications aligns with a leading practice for grants management on communicating with applicants; as well as the extent that FHWA’s processes for (2) evaluating; and (3) selecting Bridge

³GAO, *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); *Surface Transportation: Actions Needed to Improve Documentation of Key Decisions in the TIGER Discretionary Grant Program*, [GAO-14-628R](#) (Washington, D.C.: May 28, 2014); *Surface Transportation: Competitive Grant Programs Could Benefit from Increased Performance Focus and Better Documentation of Key Decisions*, [GAO-11-234](#) (Washington, D.C.: Mar. 30, 2011); and *Intercity Passenger Rail: Recording Clearer Reasons for Awards Decisions Would Improve Otherwise Good Grantmaking Practices*, [GAO-11-283](#) (Washington, D.C.: Mar. 10, 2011).

⁴GAO, *Discretionary Transportation Grants: DOT Should Improve Transparency in the Infrastructure for Rebuilding America Program*, [GAO-24-106378](#) (Washington, D.C.: Jan. 10, 2024).

⁵[GAO-17-20](#). In December 2023, DOT issued department-wide guidance on how discretionary grant program offices should integrate DOT policy priorities into the selection criteria in notices of funding opportunity. DOT officials also stated that they hired a Director for the Office of Grants and Financial Assistance in February 2024 and that this Director will lead the effort to develop additional department-wide guidance on discretionary grant programs.

⁶GAO, *Priority Open Recommendations: Department of Transportation*, [GAO-24-107347](#) (Washington, D.C.: June 10, 2024).

⁷IJA § 11118, 135 Stat. at 484.

Investment Program applications align with relevant federal regulations and DOT guidance for managing grants.

To address these objectives, we reviewed FHWA documentation of the FY2022 Bridge Investment program.⁸ This documentation included the evaluation plan—which described how DOT staff should evaluate applications. It also included the Notice of Funding Opportunity (NOFO)—which announced the availability of Bridge Investment Program funds, as well as the program’s key objectives and the criteria FHWA would use to evaluate applications. We also interviewed FHWA staff that oversaw the Bridge Investment Program.

To assess how FHWA’s Bridge Investment Program solicitation process aligned with a leading practice for communicating with applicants, we reviewed FHWA’s templates for the grant applications and guidance provided to applicants, such as webinars and outreach documents. Additionally, we conducted a semistructured interview with a nongeneralizable sample of 20 applicants, selected to achieve a mix of eligibility and selection status, applicant type (state governments, local governments, etc.), and geographic region. We also interviewed three industry associations that represent eligible applicants for their perspective. We compared collected information against GAO’s relevant leading practice for discretionary grant programs that states agencies should communicate with potential grant applicants prior to the competition.⁹

To assess how FHWA’s application evaluation and selection processes aligned with relevant federal regulations and DOT guidance, we analyzed FY2022 Bridge Investment Program grant application evaluations, evaluation and award data, selection memos, and other documentation. For all FY2022 Bridge Investment Program applications, we reviewed the evaluation data to verify whether DOT followed the process described in its evaluation plan. Additionally, for a sample of 45 applications out of 388 total applications in FY2022 (15 from each project category: Large Bridge, Bridge, Planning), we reviewed the rating narratives and other DOT documentation. We selected these applications to achieve a mix of award

⁸We assessed DOT’s process for evaluating and selecting projects for FY2022 because it was the only completed funding round at the time of our review.

⁹[GAO-11-283](#).

status, overall ratings, and applicant type.¹⁰ While our observations about the sample of applications that we reviewed are not generalizable to all applications DOT considered for funding, they provide insight into how DOT evaluated and advanced applications for potential award.

We compared this information and our analyses against relevant requirements contained in the Office of Management and Budget's (OMB) *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (OMB Regulations)¹¹ and DOT's *Guide to Financial Assistance*.¹² These federal regulations and DOT guidance establish requirements for discretionary grant programs, including relevant requirements related to consistency and transparency that we cite throughout the report.

To assess the reliability of DOT's evaluation and award data, we interviewed DOT officials and conducted data checks. We found the data were sufficiently reliable for our purposes, which were to understand how DOT evaluated and selected applications and describe the characteristics of FY2022 applicants. For more information on our scope and methodology, see appendix I.

We conducted this performance audit from January 2024 to December 2024 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

Funding the nation's surface transportation system has been on our High Risk List since 2007. Throughout that time, we have highlighted the importance of spending surface transportation funding wisely and efficiently and have noted opportunities to improve performance and accountability. Traditionally, federal surface-transportation funding, including bridge funding, has been primarily delivered through formula

¹⁰Based on the scores received on the evaluation criteria, applications are assigned an overall rating of Highly Recommended, Recommended, or Not Recommended.

¹¹*Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* 2 C.F.R. Part 200, and App. I to Part 200. DOT has adopted these provisions in regulation. 2 C.F.R. § 1201.1 (2023).

¹²DOT's *Guide to Financial Assistance* incorporates the OMB Regulations requirements.

grant programs based on distributions prescribed by statute. However, the IIJA authorized over two dozen discretionary transportation grant programs, including new programs such as the Bridge Investment Program. Discretionary grant programs represent an alternative approach for directing federal funding toward national priorities. Through a discretionary grant program, Congress or federal agencies establish desired goals or outcomes, such as reducing the overall number of bridges in poor condition in the case of the Bridge Investment Program.

There are three different types of grants within the Bridge Investment Program that applicants can apply for:

- **Large Bridge Grants** for projects to repair or replace bridges that cost over \$100 million;
- **Bridge Grants** for projects to repair or replace bridges that cost \$100 million or less;¹³ and
- **Planning Grants** for planning, feasibility analysis, and revenue forecasting of a bridge project that would be eligible for a future Bridge Investment Program grant.

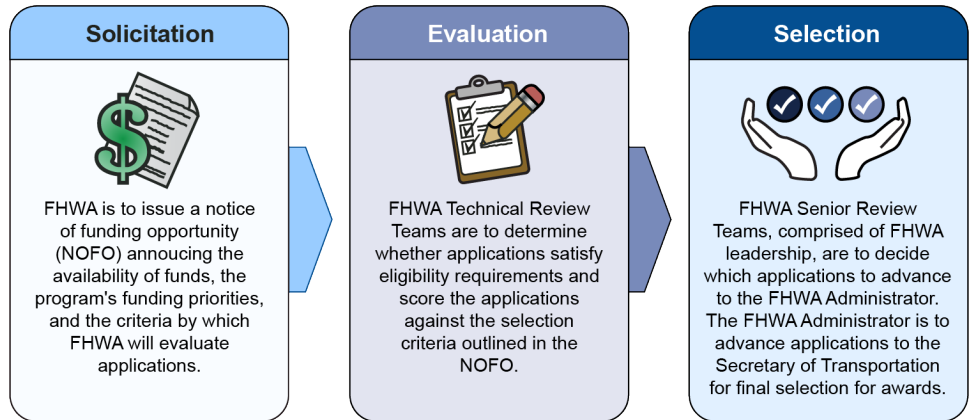
Applicants can use Bridge Investment Program grants to fund a project to replace or rehabilitate, preserve, or protect one or more highway bridges on public roads.¹⁴ Applicants can also use funds to replace or rehabilitate culverts for certain specified purposes. Entities eligible to apply for these grants include states, localities, federal land management agencies, metropolitan planning organizations, and tribal governments.

FHWA—the operating administration within DOT charged with overseeing the condition of the nation’s bridges—and the Secretary of Transportation both play a role in administering the Bridge Investment Program. As demonstrated in figure 1, FHWA releases the NOFO, the program’s Technical Review Team scores the resulting applications, and the Senior Review team advances applications. The Secretary makes the final selection.

¹³The IIJA refers to these as “eligible projects other than Large projects.”

¹⁴The IIJA specifically identifies eligible bridges for the Bridge Investment Program as those included in the National Bridge Inventory. The National Bridge Inventory is an FHWA database of all highway bridges on public roads, including tribally owned and federally owned bridges, that are bridges over waterways, other topographical barriers, other highways, and railroads.

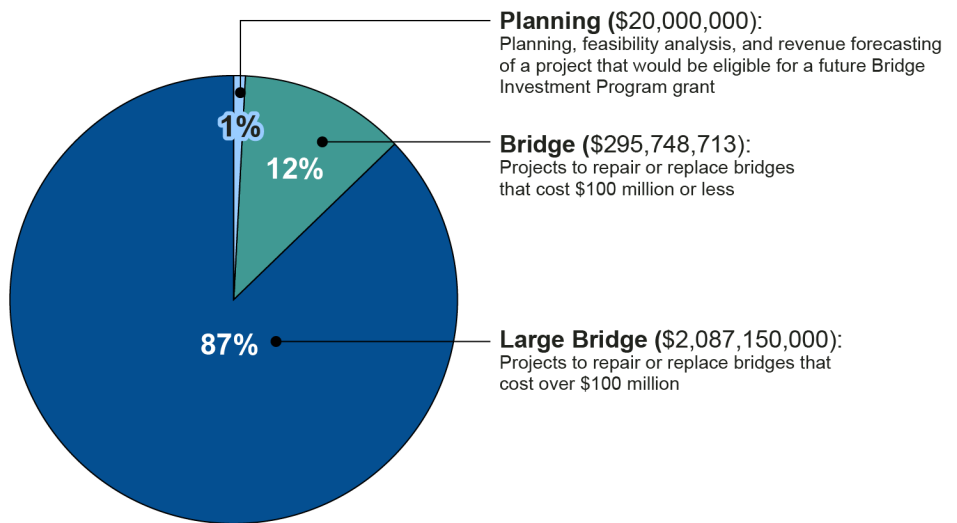
Figure 1: Overview of Federal Highway Administration’s Process for the Fiscal Year 2022 Bridge Investment Program



Source: GAO illustrations and analysis of the Federal Highway Administration’s (FHWA) Notice of Funding Opportunity for the Fiscal Year 2022 Bridge Investment Program. | GAO-25-107227

FHWA awarded the FY2022 Bridge Investment Fund grants in 2022 and 2023 and the FY2023-2024 grants in 2024. FHWA issued the first Bridge Investment Program NOFO in 2022. FHWA received 388 applications seeking over \$16 billion in funds. DOT awarded \$2.4 billion to 37 projects, with most of these funds (almost \$2.1 billion) going to four Large Bridge projects (see fig. 2). See appendix II for more details on the applicants and awarded grants for FY2022. In 2023, FHWA issued two separate NOFOs for Large Bridge and Bridge/Planning that solicited applications for the FY2023 through FY2026 funds, and FHWA plans to award these funds in three funding rounds: FY2023-2024, FY2025, and FY2026. In July 2024, FHWA announced that it awarded another \$5 billion to 13 Large Bridge projects. In August 2024, FHWA announced it awarded \$26.5 million to 28 Planning projects. Finally, in October 2024, FHWA announced it awarded almost \$635 million to 22 Bridge projects.

Figure 2: Federal Highway Administration’s Awarded Grant Amounts, by Project Category, for the Fiscal Year 2022 Bridge Investment Program



Source: GAO analysis of Federal Highway Administration’s data. | GAO-25-107227

FHWA’s Process for Soliciting Bridge Investment Program Applications Aligns with Leading Practice for Communicating with Applicants

FHWA met GAO’s leading practice that agencies should communicate with potential grant applicants prior to the competition.¹⁵ Doing so can help grant applicants refine their applications and ensure projects meet program requirements. Applicants still faced some challenges applying for the first year of Bridge Investment Program funding, and FHWA took steps in later funding rounds to try to address those challenges.

As part of this practice, agencies are to provide relevant information to grant applicants, such as the types of projects to be funded, amounts of funding, key dates, competition rules, and selection criteria. FHWA provided this information in its FY2022 Bridge Investment Program NOFO for all three of the program’s grant opportunities (Large Bridge, Bridge, and Planning). For example, at the beginning of the NOFO, FHWA separately summarized each grant opportunity, identifying the costs needed for the project to be eligible, and the amount of funding available for each category. FHWA also listed each grant opportunity’s key dates on the cover pages, as well as in the NOFO. In addition, throughout the NOFO, FHWA discussed eligibility criteria and how the applications would be evaluated. Further, the NOFO outlined how FHWA would use the

¹⁵GAO-11-283.

individual criteria ratings to assign applications an overall rating. All 20 applicants we interviewed reported the NOFO had useful information.

Additionally, the leading practice specifies that agencies are to conduct outreach efforts to new applicants, which FHWA did. FHWA issued a press release announcing the program and, according to FHWA officials, posted information about the program on its social media accounts. FHWA also notified its division offices prior to the NOFO being issued, so that these offices could forward the information to potential applicants and stakeholders. Further, FHWA hosted a closed webinar to state departments of transportation and other potential applicants to explain the program and the application process. The three associations representing eligible applicant groups and all applicants we spoke with learned of the Bridge Investment Program through ongoing research about grant opportunities and coordinating with federal, state, and local organizations.

Further, the leading practice indicates that agencies are to provide preapplication assistance to applicants, which FHWA also did. FHWA hosted webinars, posted Frequently Asked Questions (FAQ) on the website, and provided an email and phone number to answer applicant questions. Two associations representing local governments praised FHWA's assistance efforts. For example, one said that DOT and FHWA had gone above and beyond to provide resources for applicants for this program. They said that DOT and FHWA officials provided in-person support by attending meetings and answering questions. FHWA also had a monthly call to answer questions. Nineteen of the 20 applicants we spoke with said they either watched the webinars or read the FAQs. Fourteen said the webinars and FAQs were at least somewhat useful, although some said they only restated what was in the NOFO.

Despite FHWA's assistance, 13 of 20 applicants we spoke with reported that they still faced challenges applying for Bridge Investment Program grants. For example, the application had a requirement to analyze how a project is expected to provide greater benefits than costs, called a benefit-cost analysis. Applicants noted that this benefit-cost analysis was difficult to complete, given their lack of economic expertise or resources. Others had challenges understanding the scoring criteria and specific information needed in the application. One tribal applicant and one federal land management applicant we spoke with both noted that some requirements or criteria were not applicable to them. For example, according to a tribal applicant we spoke with, tribal bridges may be on federal trust lands that do not show clear applicant ownership, as required in the application.

FHWA made changes to the solicitation process for FY2023-2026, which addressed some of the challenges applicants faced applying for grants. The majority of applicants that applied for these grants were positive about the changes. For example, two applicants said FHWA appeared to have considered feedback to make useful changes to the application process. Changes made for FY2023-2026 include the following:

- FHWA published separate NOFOs for Large Bridge and Bridge/Planning Projects for FY2023-2026. Eight of the 14 applicants we spoke with that also applied for FY2023-2026 grants noted improvements in the updated NOFOs, including that the separate NOFOs made the criteria clearer for each category.¹⁶ Two applicants and one association we interviewed also said that they appreciated having a NOFO cover multiple years of funding because it provided advance notice of when applications would be due.
- FHWA also provided a Smart Application Template for each of Large Bridge, Bridge, and Planning applications. This allowed applicants to create their application in Excel. One applicant noted this was useful because they could make sure they addressed every component, instead of trying to cover them all in a single narrative.
- FHWA created a new benefit-cost analysis tool that pulls in data from the National Bridge Inventory. Six of the 14 applicants said this made the benefit-cost analysis easier to complete.
- Further, FHWA has started allowing applicants to amend their applications for FY2023-2026, in certain situations. For example, according to the FY2023-2026 Large Bridge NOFO, FHWA will notify each Large Bridge applicant of the overall application rating and allow them a chance to submit an amended application to address the rating.¹⁷ Applicants can also request a debrief at that point. Six of the applicants we spoke with found this outreach extremely helpful to understand how to strengthen their applications before final selections.

¹⁶Six of the 20 applicants in our sample only reported applying for the FY2022 round.

¹⁷According to the NOFO, FHWA will also contact Large Bridge applicants whose applications are initially determined to be ineligible and offer them a chance to amend their applications. Additionally, for Bridge applications, FHWA will contact eligible applicants that were Recommended or Highly Recommended up until the Economic Analysis or Project Readiness evaluation and will offer them a chance to amend the application to improve the ratings. Planning applicants whose applications are determined to not meet certain eligibility criteria will not advance for evaluation, and such applicants will not be given a chance to submit an amended application.

FHWA's Evaluation Process Did Not Fully Align with Federal Regulations and DOT Guidance

In response to federal regulations and DOT guidance, FHWA created an evaluation plan and followed the process described in it when evaluating applications. However, FHWA's evaluation plan did not include sufficient detail on how reviewers should conduct and document evaluations and quality control reviews. Such instructions are important to ensuring complete and consistent documentation of the evaluation of applications.

FHWA Developed and Followed an Evaluation Process

FHWA designed and executed an evaluation process for applications, as required by federal regulations and DOT guidance. OMB regulations require agencies to design and execute a process to evaluate applications and award discretionary grant funding.¹⁸ Similarly, DOT's *Guide to Financial Assistance* requires DOT operating administrations such as FHWA to establish a plan (referred to as the "evaluation plan") for evaluating and selecting applications. This plan should include the criteria and process for the evaluation of applications. FHWA is then to use that process to evaluate applications. These efforts are intended to ensure that applicants can make informed decisions to maximize the fairness of the process.¹⁹

In response to these regulations and guidance, FHWA created an evaluation plan for the FY2022 round of funding. FHWA's FY2022 evaluation plan generally describes the application review process—including the eligibility requirements, sequence of review, and evaluation criteria—as well as the process for advancing projects. Figure 3 outlines FHWA's evaluation process for Large Bridge and Bridge applications. Planning applications have a similar but simpler evaluation process that does not involve a Benefit-Cost Analysis.²⁰ See appendix III for a

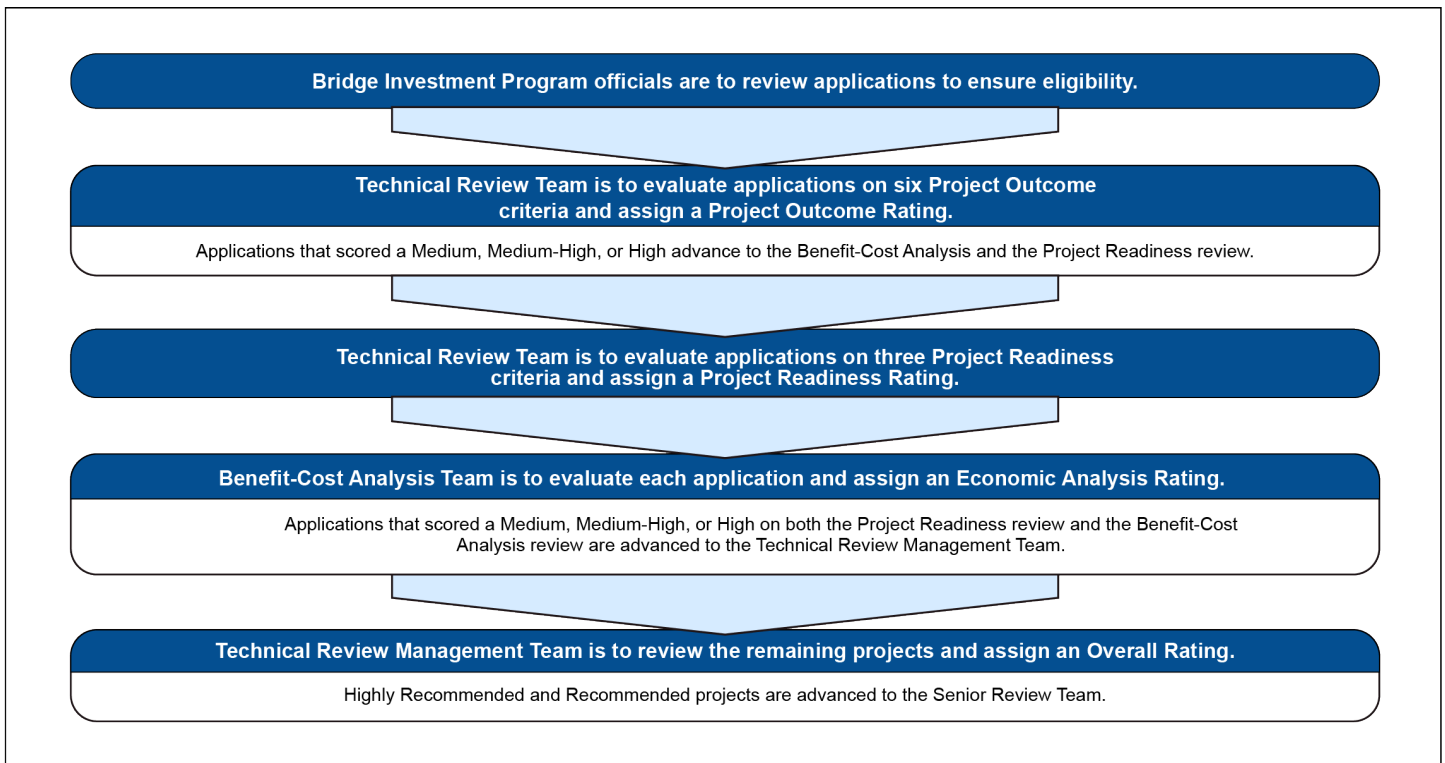
¹⁸*Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* 2 C.F.R. Part 200, and App. 1 to Part 200. DOT has adopted these provisions in regulation. 2 C.F.R. § 1201.1.

¹⁹Department of Transportation, *Department of Transportation Guide to Financial Assistance*, (Washington, D.C.: October 2019).

²⁰For planning applications, the Program Manager reviews the applications to ensure they meet all eligibility requirements. The Technical Review Team assigns scores on the technical review (consisting of four evaluation criteria). Based on the score received on the technical review, the Technical Review Management Team assigns an overall rating and advances the Recommended and Highly Recommended applications to the Senior Review Team. Planning applications do not receive Benefit-Cost Analysis or Project Readiness reviews.

description of the criteria and ratings that FHWA created for the FY2022 Bridge Investment Program.

Figure 3: Federal Highway Administration’s Evaluation Process for the Fiscal Year 2022 Bridge Investment Program for Large Bridge and Bridge Applications



Source: GAO analysis of the Federal Highway Administration’s evaluation plan for the Fiscal Year 2022 Bridge Investment Program. | GAO-25-107227

FHWA also followed the processes it laid out in its evaluation plan when evaluating Bridge Investment Program applications, based on our review of FHWA’s evaluation documentation.

- *Eligibility Review:* FHWA evaluated the eligibility of applications based on statutory requirements, such as applicant type, project type, and project cost types, and documented the reasoning for applications that failed to meet one or more eligibility requirements.
- *Technical Review:* FHWA assigned an overall Project Outcome score to all eligible Large Bridge and Bridge applications based on the

scores received on the six Project Outcome criteria.²¹ For Large Bridge and Bridge projects, FHWA advanced all applications that scored a “Medium” or higher on the Project Outcome criteria to receive a Benefit-Cost Analysis review and a Project Readiness review.²² All advanced applications received scores on the Benefit-Cost Analysis review and the Project Readiness review in accordance with guidelines in the evaluation plan.

- *Overall Ratings:* FHWA assigned all applications an overall rating in accordance with the guidelines in the evaluation plan. Applications received one of the following overall ratings: Highly Recommended, Recommended, or Not Recommended. See appendix III for FHWA’s process for assigning overall ratings and appendix IV for the results of FHWA’s evaluation processes.

FHWA’s Evaluation Plan Did Not Include Sufficient Instructions for Evaluations and Quality Control Reviews

Evaluations

FHWA’s evaluation plan did not provide detailed instructions for reviewers to use to assign scores against the evaluation criteria. According to DOT’s *Guide to Financial Assistance*, agencies’ evaluation plan should include an approach to documentation that will record the review panel’s assessment of each application in relation to the review criteria. It should also develop a set of policies and procedures that permit consistency in

²¹FHWA also assigned an overall Project Outcome score to all eligible Planning applications based on the scores received on four Project Outcome criteria.

²²According to FHWA’s “FY2022 Bridge Investment Program Guidelines for Evaluation of Applications” evaluation plan, all Bridge and Large Bridge applications that receive a Medium, Medium-High, or High on the Project Outcome review should be advanced to the Benefit-Cost Analysis and Project Readiness reviews. In some instances, applications that scored a Low or Medium-Low on the Project Outcome review were advanced to the Benefit-Cost Analysis and Project Readiness reviews. FHWA officials told us that in some instances, an applicant’s Project Outcome score may have been lowered after receiving a quality control review from a second reviewer, making it appear that the applicant was advanced despite not scoring highly enough to advance. FHWA officials told us that they decided to advance projects based on the initial Project Outcome score and accept the risk of an application receiving unnecessary reviews. This was to avoid delaying the overall review process by waiting for the initial score to be affirmed during the quality control process. Planning applications only have a one-step Project Outcome review and do not receive Benefit-Cost Analysis or Project Readiness reviews.

the evaluation of applications. Additionally, the plan should provide instructions and training for reviewers and information about the ratings and criteria for completely and consistently documenting their review.

However, we found that FHWA's narratives for scores were not always complete or consistent with the evaluation criteria. Specifically, for our sample of 45 applications, we found 26 applications where the reviewer's score narrative did not fully support at least one of the assigned scores on the evaluation criteria, as described below:²³

- In some instances, reviewers' narratives did not provide sufficient detail to understand the rationale for the applicants' scores. For example, four applications in our sample received a "Highly Responsive" score for the Climate Change criterion, though the narrative did not mention if the applicant had provided any quantifiable data, which is required to receive that score.²⁴ It is unclear whether the application lacked the quantifiable data and erroneously received a "Highly Responsive" score, or whether the applicant provided the data but the reviewer did not document it.
- In other instances, the reviewers appear to have assigned scores that contradict the requirements stated in the FY2022 NOFO. For example, one application in our sample received a "Highly Responsive" score for the Mobility and Economic Competitiveness criterion when it is not clear it met the requirements. According to the NOFO, to score a "Highly Responsive" on the Mobility and Economic Competitiveness criterion, applicants had to provide specific information for several subcomponents. This included providing a detailed description of the number of structures and the total person miles traveled expected to be impacted by the project. We found that the reviewer assigned an application a "Highly Responsive" on this criterion, despite noting that the applicant did not provide data on person miles traveled.

FHWA's FY2022 evaluation plan contained insufficient detail in the reviewer instructions to help ensure that reviewers scored and

²³For the purposes of our analysis, we reviewed the narratives provided on the six Project Outcome criteria, the overall narrative on the Benefit-Cost Analysis, and the narratives on the three Project Readiness criteria.

²⁴The Climate Change, Resiliency, and the Environment criterion requires applicants to include quantifiable data that demonstrates either (1) a reduction of air pollution or greenhouse gases, (2) improved resiliency of at-risk infrastructure, (3) improved wildlife connectivity, or (4) action to address the disproportionate negative environmental impacts on disadvantaged communities to score Highly Responsive.

documented applications completely and consistently. Specifically, the evaluation plan did not provide reviewers with additional information, such as guidance on how to apply the evaluation criteria when assigning ratings or provide any sample narratives to assist reviewers. Thus, reviewers did not have details or examples on what they should document in the narratives to explain the rationale for each rating. FHWA officials told us that reviewers received training via meetings and webinars on how to conduct and document their evaluations. However, FHWA did not document these trainings, so reviewers could not refer to the information after the trainings.

When asked about inconsistencies found in the narratives, FHWA officials noted that they added more meetings and email communication to help ensure consistency across reviewers for FY2023-2026. However, FHWA has not added instructions on how reviewers should conduct and document their evaluation to their FY2023-2026 evaluation plan. FHWA officials also told us that they are developing example narratives to provide as a resource for reviewers but had not completed examples for all criteria for the FY2023-2024 round.

More detailed instructions in the evaluation plan on how reviewers should conduct and document their evaluation of applications could provide more clarity to reviewers and help ensure a complete and consistent review of applications. By enhancing the instructions to reviewers, FHWA could help better ensure that the evaluation process is more consistently applied. Additionally, improving documentation of the narratives could help FHWA provide better information to unsuccessful applicants in debriefs, allowing applicants to improve their applications for future cycles. Finally, quality feedback is even more important now that FHWA is offering applicants the chance to amend their applications after the initial review.

Quality Control Reviews

FHWA's instructions for its quality control process for reviewing its ratings and narratives were not adequately detailed or documented. DOT's *Guide to Financial Assistance* states that the merit review processes of DOT operating administrations, such as FHWA, must describe how oversight will take place to ensure a consistent review of applications.

FHWA's FY2022 evaluation plan briefly describes how to conduct quality control reviews for Large Bridge and Bridge applications, which was intended to provide oversight for the program. Specifically, the plan states that after the primary reviewer conducts their technical review, another member of the Technical Review Team conducts an additional review of

evaluation scores and narratives to support scores for each criterion. According to the evaluation plan, the Program Manager is responsible for coordinating and managing these reviews, including resolving any conflicting reviews and reaching consensus on the assigned scores between the primary reviewers and quality control reviewers.²⁵

However, FHWA's evaluation plan did not include details on how the quality control reviews—including the resolution of conflicting reviews—should be documented or how the status of the quality assurance reviews should be tracked. As a result, we found that FHWA did not clearly document whether reviewers reached consensus or if reviews were completed:

- First, resolution of conflicts between reviewers was not always documented. We reviewed a sample of 30 Large Bridge and Bridge application evaluation templates and found that nine applications had quality control comments that were not fully addressed or resolved. For example, for one application, the primary reviewer rated the application as “Highly Responsive” on the Safety criterion. However, the quality control reviewer recommended that the rating change to “Responsive” and provided supporting evidence from the application to justify the change. The primary reviewer did not incorporate this feedback and there is no documented resolution of this conflict, though the evaluation plan states that the quality control reviewer is supposed to reach consensus with the initial reviewer.
- Second, in FHWA's spreadsheets which track the status of the quality control review, the data were not always updated. For example, among Bridge applications, most applications were labeled as “completed,” but two applications were only labeled as “started.” Additionally, FHWA did not include a column to capture the status of the quality control review for Large Bridge applications. This raises questions regarding whether FHWA completed the quality assurance process for all applications.

FHWA's instructions for quality control reviews of Planning applications were also not adequately detailed or documented. For these applications, there is no information in FHWA's FY2022 evaluation plan about how to

²⁵FHWA's evaluation plan also includes a provision about quality assurance reviews for the Benefit-Cost Analysis review. The evaluation plan states that all Large Bridge projects will receive a third-level review from one senior member of the Secretary of Transportation's Office of the Chief Economist. All Bridge projects will receive a third level review from one senior member of FHWA's Economic Investment Strategies. However, our review focuses on the quality assurance reviews at the technical review stage.

conduct quality control reviews for applications or document the results. According to FHWA officials, one Bridge Investment Program official conducted a second, quality control review of all the Planning evaluations after they were completed. However, in the sample of applications we reviewed, there was no documentation that any review was completed. Such documentation would provide FHWA assurance that an additional reviewer had verified the assigned ratings for Planning grants.

Officials told us that FHWA has made changes for their quality control process for FY2023-2026. According to FHWA officials, FHWA updated their process to conduct primary and quality control reviews simultaneously, instead of consecutively, to ensure independent reviews. In instances where there are conflicting comments, FHWA officials are to hold a meeting to discuss conflicting reviews and reach consensus. Additionally, FHWA officials told us that they started using a new grants management system that documents the quality control reviews. Reviewers are to record notes from the quality control meetings into the system as the official record. However, FHWA has not added this information to its FY2023–2026 evaluation plan and has not produced other guidance on conducting and documenting quality control reviews.

Without providing additional instructions on how the quality control process should be conducted and documented, FHWA cannot ensure it is scoring applications for award based on reliable data. Because these ratings are to inform the selection process, errors in the scores and justifications could affect applications' chances to receive an award.

FHWA Has Taken Steps to Improve Aspects of FY2022 Selection Process That Did Not Align with DOT Guidance

FHWA Documented Rationale for Selection Decisions

FHWA documented its selection decisions for the FY2022 Bridge Investment Program in several memos, which aligns with DOT guidance. DOT's *Guide to Financial Assistance* states that grant documentation should include a rationale for why the selected applications were chosen for funding over other applications and why nonawarded projects did not receive an award. FHWA's selection memos met these criteria by

outlining how the Senior Review Team applied factors such as geographic diversity and explained why selected applications were chosen over others across all three bridge programs.

Specifically, FHWA created separate selection memos for Large Bridge, Bridge, and Planning applications that describe how they implemented selection factors and provide a rationale for why selected applications were chosen for award, for example:

- The Bridge selection memo described how the Senior Review Team implemented a Senior Review Team decision to advance, for selection, only one application per state. Specifically, the memo described how two eligible entities from a state submitted applications, but only the higher-rated project within that state was advanced for consideration. According to FHWA officials, to both meet (1) the statutory requirement to consider geographic diversity and (2) help FHWA accomplish a priority requirement in statute to distribute at least one Large Bridge or two Bridge projects to each priority state, they decided to limit a state to no more than one award for the first round of awards.²⁶
- In the Planning memo, FHWA outlined the steps the Senior Review Team took to select projects to advance. Specifically, they first selected “Highly Recommended” applications, limiting these projects to one per state and preferencing rural projects; then they advanced recommended projects that would eventually lead to a Large Bridge project, with a preference for local government and rural projects. According to FHWA officials, they decided to prioritize rural and local government Planning applications to ensure that awards were distributed across the various eligible applicant types.

In addition to the selection memos, FHWA also created individual memos for Large Bridge and Bridge applications that were rated “Not

²⁶Bridge Investment Program statutory provisions require the Secretary of Transportation to consider the geographic diversity among recipients, including the need for a balance between the needs of rural and urban communities, among other considerations. 23 U.S.C. § 124(c)(5)(A)(vii). Additionally, in awarding grants under the Bridge Investment Program, the Secretary is required to select at least one Large Bridge project or two Bridge projects in specified priority states that the Secretary determines are justified under the program’s statutory evaluation factors. 23 U.S.C. § 124(c)(5)(B)(II). Such priority states are those for which (1) two or more applications for eligible projects within the state were submitted for the current fiscal year, (2) an average of two or more such applications within the state were submitted in prior fiscal years of the program, and (3) fewer than two grants have been awarded for such projects within the state under the program. 23 U.S.C. § 124(c)(5)(B)(I).

Recommended.” These memos provide details on why the applications received the ratings they did and were, therefore, not recommended for funding. For example, one memo notes that an application was rated “Responsive,” and not “Highly Responsive,” on a Project Outcome criterion because it did not show how the project reduces congestion and improves reliability in the project corridor with realistic estimates of improved travel time and traffic throughput.

We have previously observed that DOT grant programs have struggled to document key decisions in the selection process.²⁷ By describing the process and how specific decisions were made, FHWA’s documentation provides greater accountability and insight into the decision-making and rationale for awarding Bridge Investment Program grants. See appendix II for information on selected awards, and appendix IV for the results of FHWA’s selection process.

FHWA Has Begun Notifying Unsuccessful Applicants of Award Decisions

For FY2022, FHWA did not notify unsuccessful Bridge Investment Program applicants of their award status, as required by DOT guidance. DOT’s *Guide to Financial Assistance* requires FHWA to notify applicants that their application was not successful. Additionally, the guide requires FHWA to provide each unsuccessful applicant either (1) a brief, written explanation of the decision; or (2) an opportunity to receive post-selection oral feedback regarding the decision and review of their application. For the FY2023-2024 funding round, however, FHWA began to notify unsuccessful applicants after it announced awards.

According to FHWA officials, FHWA division offices only notified applicants that received awards for the FY2022 funding round. Two unsuccessful applicants we spoke with described receiving no notice of whether they had received an award. One eventually realized their application was not selected when FHWA published the list of grant awards.

We provided this information to FHWA officials in June 2024, and FHWA officials explained that the electronic systems they used for the FY2022 program were not capable of sending mass emails to the hundreds of

²⁷See, for example, GAO, *Discretionary Transportation Grants: DOT Should Take Actions to Improve the Selection of Freight and Highway Projects*, [GAO-18-38](#) (Washington, D.C.: Nov. 2, 2017); *Discretionary Transportation Grants: Actions Needed to Improve Consistency and Transparency in DOT’s Application Evaluations*, [GAO-19-541](#) (Washington, D.C.: June 26, 2019); and *Discretionary Transportation Grants: DOT Should Clarify Application Requirements and Oversight Activities*, [GAO-22-104532](#) (Washington, D.C.: Apr. 6, 2022).

unsuccessful applicants, and they did not have time to send individual emails to these applicants.²⁸ They noted that they had improved their systems and could have the capability to send mass emails.

Following our discussions, FHWA announced the FY2023-2024 Large Bridge and Planning awards and began notifying unsuccessful applicants by email to offer them options for requesting a debrief.²⁹ According to officials, they plan to notify unsuccessful Bridge applicants after the FY2023-2024 awards are announced. By providing this written notification about the opportunity to request a debrief to all applicants, FHWA is helping ensure that all applicants have the same opportunity to improve their applications for future funding rounds.

Conclusions

Thousands of bridges across the United States are in poor condition and in need of critical repairs and maintenance. FHWA's Bridge Investment Program is an important tool for targeting federal infrastructure spending to preserve or replace bridges of local, regional, and national significance. FHWA set up a solicitation process that applicants generally found helpful. Additionally, FHWA also began notifying unsuccessful applicants after discussions with GAO.

However, while FHWA's processes for evaluating and selecting applications generally align with relevant federal regulations and DOT guidance, the first year of the program exposed gaps. Specifically, we found that FHWA's evaluation plan lacked detailed instructions for reviewers on how to conduct and document their evaluations and quality control reviews. These gaps led to inconsistencies in the evaluation of applications. Developing more detailed instructions will help ensure that reviewers score the Bridge Investment Program applications fairly and consistently and, in turn, allow FHWA to fund projects that best address program goals and improve the condition of aging and at-risk bridges nationwide.

²⁸The FY2022 Bridge Investment Program NOFO noted that unsuccessful applicants could request a debrief with FHWA staff.

²⁹In its emails to unsuccessful Planning applicants, FHWA noted that applicants had the option to request a debrief and provided an email address that applicants could contact to do so. For Large Bridge, there was approximately 2 weeks between when FHWA announced the awards and when the FY2025 applications were due. In its email notifying unsuccessful Large Bridge applicants, FHWA gave applicants the option of rolling their FY2023-2024 application over into the FY2025 round due to this short time frame. As part of this next funding round, these applicants could then request feedback and have a chance to provide additional information.

Recommendations for Executive Action

The FHWA Administrator should improve instructions for reviewers on how to conduct and document their evaluation of applications in the Bridge Investment Program evaluation plan. For example, FHWA could provide examples of narratives for the different scores for each criterion or clarify whether applicants must meet each part of a criterion to receive particular scores. (Recommendation 1)

The FHWA Administrator should create additional instructions for reviewers on how to conduct and document the quality control process to ensure all applications are consistently evaluated. (Recommendation 2)

Agency Comments and Our Evaluation

We provided a draft of this report to the Department of Transportation for review and comment. The Department of Transportation concurred with our recommendations (see letter reproduced in app. V). The Department of Transportation also provided technical comments, which we incorporated, as appropriate.

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



Elizabeth Repko
Director, Physical Infrastructure

Appendix I: Objectives, Scope, and Methodology

This report reviews the Bridge Investment Program and describes the Federal Highway Administration's (FHWA) processes to solicit, evaluate, and select applications for awarding Bridge Investment Program grants in fiscal year (FY) 2022. Specifically, it assesses the extent to which (1) FHWA's solicitation process aligned with a leading practice, and the extent to which FHWA's (2) evaluation and (3) selection processes aligned with relevant federal regulations and Department of Transportation (DOT) guidance for ensuring consistency and transparency.¹

For all objectives, we reviewed our prior work on DOT's discretionary grant programs. We also reviewed FHWA's outreach materials, Notice of Funding Opportunity (NOFO), and corresponding evaluation plan for the Bridge Investment Program. In addition, we interviewed FHWA officials who oversaw the evaluation process to understand how they administered the FY2022 cycle of the Bridge Investment Program as well as changes to the evaluation process they implemented for FY2023-FY2026.

To assess how FHWA's Bridge Investment Program solicitation process aligned with a leading practice, we analyzed FHWA communications with applicants. Specifically, we reviewed FHWA's NOFOs, templates for the grant applications, and guidance provided to applicants such as webinars and outreach documents. Additionally, we conducted a semistructured interview with a sample of 20 applicants that applied for Bridge Investment Program grants to understand the implementation of the Bridge Investment Program from the applicants' perspective. To ensure we interviewed a diverse sample of applicants, we selected a mix of applicants, varied by eligibility and selection status, applicant type (state governments, local governments, etc.), and geographic region. We also interviewed three industry associations that represent eligible applicants, for their perspective. We compared collected information against a relevant leading practice for discretionary grant programs.²

¹Office of Management and Budget's *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (OMB Regulations); and Department of Transportation, *Guide to Financial Assistance* (Washington, D.C.: October 2019).

²GAO, *Intercity Passenger Rail: Recording Clearer Reasons for Awards Decisions Would Improve Otherwise Good Grantmaking Practices*, [GAO-11-283](#) (Washington, D.C.: Mar. 10, 2011).

To assess how FHWA's evaluation process aligned with relevant federal regulations and DOT guidance, we analyzed FY2022 Bridge Investment Program grant application evaluation and award data and documentation.

- For each of the different categories of projects (Large Bridge, Bridge, and Planning), we analyzed all Application Evaluation Templates wherein FHWA reviewers recorded (1) whether they determined the applicant was eligible or not; and, if so, (2) ratings in three areas: Technical Review, Benefit-Cost Analysis, and Project Readiness review.³ We transferred all the data fields from the Application Evaluation Templates into a spreadsheet for further analysis. Specifically, we assessed whether FHWA correctly assigned ratings based on the requirements outlined in the Bridge Investment Program evaluation plan.
- We reviewed a sample of 45 Bridge Investment Program applications (15 from each project category). We selected our sample to achieve a mix of awarded and nonawarded projects, as well as a mix of applications that were Highly Recommended, Recommended, and Not Recommended. We also selected applications that represented different applicant types (state governments, local governments, etc.). For this sample, we assessed the extent to which the reviewer narratives supported the assigned rating on each evaluation criterion, as stated in the Bridge Investment Program evaluation plan. We also reviewed comments from quality control reviewers to assess the extent to which FHWA reviewers documented the quality control process. While our observations about the applications are not generalizable to all applications FHWA considered for funding, they provide insight on how FHWA evaluated and advanced applications for potential award.
- We compared information from the evaluation data and other FHWA documentation against the federal regulations and DOT guidance requirements for discretionary grant programs relevant to evaluations. These requirements are in the Office of Management and Budget's *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* and DOT's *Guide to Financial Assistance*.⁴ These federal regulations and DOT guidance establish

³For FY2022, there were 40 Large Bridge applications, 260 Bridge applications, and 88 Planning applications.

⁴2 C.F.R. Part 200, and App. I to Part 200; DOT has adopted these provisions in regulation. See 2 C.F.R. § 1201.1. Department of Transportation, *Guide to Financial Assistance*. DOT's *Guide to Financial Assistance* incorporates the OMB regulations at 2 C.F.R. Part 200, and App. I to Part 200.

requirements applicable to DOT operating administration discretionary grant programs, including requirements related to consistency and transparency.

To assess how FHWA's selection process aligned with relevant federal regulations and DOT guidance, we analyzed FY2022 Bridge Investment Program grant application selection data and documentation.

- We reviewed the Secretary of Transportation's selection memos for Planning, Bridge, and Large Bridge project categories that describes how all projects were selected.
- Additionally, for our sample of 45 applications, we reviewed the Secretary's selection memos and memos on the basis for rating applications to determine the extent to which FHWA documented its selection decisions.
- We compared information from the Bridge Investment Program grant application selection process and FHWA documentation against federal requirements for discretionary grant programs relevant to selection. These requirements are contained in the Office of Management and Budget's *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* and DOT's *Guide to Financial Assistance*. These federal provisions establish requirements for discretionary grant programs, including requirements related to consistency and transparency.

We analyzed FHWA evaluation and award data to verify that FHWA correctly followed their scoring processes from the evaluation plan. To assess the reliability of FHWA's evaluation and award data, we reviewed FHWA documentation, interviewed knowledgeable FHWA officials to better understand the data sources, and conducted a manual comparison of the data output to the source documents to confirm accuracy. In addition, we asked knowledgeable FHWA officials questions on the reliability of the data. We determined that the data were sufficiently reliable for our purposes of understanding FHWA's Bridge Investment Program evaluation and selection processes.

We conducted this performance audit from January 2024 to December 2024 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.

Appendix II: Overview of Bridge Investment Program Applicants and Awards for Fiscal Year 2022

Table 1: Applicant Type and Location for Fiscal Year 2022 Bridge Investment Program Applications and Selected Projects (Overall)

	Applicants	Selected
Total	388	37
Applicant type		
State	88	11
Local	266	21
Federal	14	1
Tribal	3	0
Metropolitan planning organization	2	0
Public authority	13	3
Political subdivision of the state	1	1
Unspecified	1	0
Location		
Urban	193	23
Rural	179	14
Urban and rural	14	0
Unspecified	2	0

Source: GAO analysis of the Federal Highway Administration's application data for the Fiscal Year 2022 Bridge Investment Program. | GAO-25-107227

Table 2: Applicant Type and Location for Fiscal Year 2022 Bridge Investment Program Applications and Selected Projects (Large Bridge)

	Applicants	Selected
Total	40	4
Applicant type		
State	24	2
Local	8	1
Federal	2	0
Public authority	5	1
Metropolitan planning organization	1	0
Location		
Urban	30	4
Rural	8	0
Urban and rural	2	0
Unspecified	0	0

Source: GAO analysis of the Federal Highway Administration's application data for the Fiscal Year 2022 Bridge Investment Program. | GAO-25-107227

**Appendix II: Overview of Bridge Investment
Program Applicants and Awards for Fiscal
Year 2022**

Table 3: Applicant Type and Location for Fiscal Year 2022 Bridge Investment Program Applications and Selected Projects (Bridge)

	Applicants	Selected
Total	260	9
Applicant type		
State	47	4
Local	193	3
Federal	11	0
Public authority	5	1
Tribal	2	0
Metropolitan planning organization	1	0
Political subdivision of a state	1	1
Location		
Urban	125	5
Rural	129	4
Urban and rural	6	0

Source: GAO analysis of the Federal Highway Administration's application data for the Fiscal Year 2022 Bridge Investment Program. | GAO-25-107227

Table 4: Applicant Type and Location for Fiscal Year 2022 Bridge Investment Program Applications and Selected Projects (Planning)

	Applicants	Selected
Total	88	24
Applicant type		
State	17	5
Local	65	17
Federal	1	1
Public authority	3	1
Tribal	1	0
Unspecified	1	0
Location		
Urban	38	14
Rural	42	10
Urban and rural	6	0
Unspecified	2	0

Source: GAO analysis of the Federal Highway Administration's application data for the Fiscal Year 2022 Bridge Investment Program. | GAO-25-107227

Appendix III: Bridge Investment Program Evaluation Criteria and Overall Ratings for Fiscal Year 2022

This graphic summarizes the evaluation criteria for fiscal year 2022 Bridge Investment Program applications.

Figure 5: Evaluation Criteria for Bridge Investment Program Applications (Large Bridge and Bridge)

Criteria and description	Possible ratings				
Project outcomes criteria (6 components) <ul style="list-style-type: none"> State of good repair Safety Mobility and economic competitiveness Climate change, resiliency, and the environment Equity, partnership and quality of life Innovation 	Non-Responsive: The application does not clearly describe how the proposed project will advance the selection criteria, the data provided in the application does not demonstrate how the project will advance a selection criterion, or no data is included in the application.				
	Responsive: The application generally describes with little detail how the proposed project will advance the selection criteria. The data provided in the application is limited or does not directly demonstrate how the proposed Other than Large or Large project would advance a selection criterion.				
	Highly Responsive: The application describes in detail how the proposed project will advance the selection criteria. Data provided in the application directly supports how the proposed Other than Large or Large project would advance a selection criterion.				
Economic analysis rating Whether and the extent to which a project's benefits exceeds its costs	Low: The project's costs will exceed its benefits.	Medium-low: The project's costs are likely to exceed its benefits.	Medium: The project's benefits are likely to exceed its costs.	Medium-high: The project's benefits will exceed its costs.	High: The project's benefits will exceed its costs, with a benefit-cost ratio of at least 1.5.
Project readiness (3 components) <ul style="list-style-type: none"> Technical assessment Financial completeness Environmental review and permitting risk 	Ratings ranging from 1-3				
	1) Uncertain	2) Somewhat certain/unknown		3) Certain	
	1) Incomplete	2) Partially complete/appear stable and highly likely to be available		3) Complete, stable, and committed	
	1) High risk	2) Moderate risk		3) Low risk	

Source: GAO analysis of the Federal Highway Administration's evaluation plan for the Fiscal Year 2022 Bridge Investment Program. | GAO-25-107227

Tables 5 and 6 summarize the Federal Highway Administration's policy for assigning overall ratings for fiscal year 2022 Bridge Investment Program applications.

**Appendix III: Bridge Investment Program
Evaluation Criteria and Overall Ratings for
Fiscal Year 2022**

Table 5: Federal Highway Administration’s Requirements for Assigning Overall Ratings to Bridge Investment Program Applications (Large Bridge and Bridge Applications)

Overall application rating	Criteria
Highly Recommended	<ul style="list-style-type: none"> • Meets all eligibility requirements • Received a Highly Responsive rating for State of Good Repair and Safety • Received a Highly Responsive rating on no less than three out of the four remaining Project Outcome criteria • Received no less than a Medium-High on both the economic analysis and project readiness
Recommended	<ul style="list-style-type: none"> • Meets all eligibility requirements • Received a Highly Responsive rating for State of Good Repair and Safety • Received a Highly Responsive rating on no less than two out of the four remaining Project Outcome criteria • Received no less than a Medium on both Economic Analysis and Project Readiness
Not Recommended	<ul style="list-style-type: none"> • Does not meet one or more eligibility requirements • Received a Non-Responsive on any of the criteria • Is not otherwise assigned a “Highly Recommended” or “Recommended” rating

Source: GAO analysis of the Federal Highway Administration’s evaluation plan for the Fiscal Year 2022 Bridge Investment Program. | GAO-25-107227

Table 6: Federal Highway Administration’s Requirements for Assigning Overall Ratings for Bridge Investment Program Applications (Planning Applications)

Overall application rating	Criteria
Highly Recommended	<ul style="list-style-type: none"> • Meets all eligibility requirements • Received a Highly Qualified rating for all four project selection criteria
Recommended	<ul style="list-style-type: none"> • Meets all eligibility requirements • Received one Qualified rating on a project selection criterion and then meets or exceeds Qualified on the remaining project selection criteria
Not Recommended	<ul style="list-style-type: none"> • Does not meet one or more eligibility requirements • Receives at least one Not Qualified rating on a project selection criterion

Source: GAO analysis of the Federal Highway Administration’s evaluation plan for the Fiscal Year 2022 Bridge Investment Program. | GAO-25-107227

Appendix IV: Fiscal Year 2022 Bridge Investment Program Applications, by Stage

For fiscal year 2022, the Federal Highway Administration received 388 applications across the three types of Bridge Investment Program grants: Large, Bridge, and Planning. Figures 6 through 8 provide information on how these applications progressed through each stage of the evaluation and selection process, by type of grant.

Figure 6: Overview of Results of Bridge Investment Program Intake, Evaluation, and Selection Process for Bridge Investment Program Planning Grants



Source: GAO illustrations and analysis of the Federal Highway Administration data for the Fiscal Year 2022 Bridge Investment Program. | GAO-25-107227

Figure 7: Overview of Results of Bridge Investment Program Intake, Evaluation, and Selection Process for Bridge Investment Program Large Bridge Grants



Source: GAO illustrations and analysis of the Federal Highway Administration data for the Fiscal Year 2022 Bridge Investment Program. | GAO-25-107227

Figure 8: Overview of Results of Bridge Investment Program Intake, Evaluation, and Selection Process for Bridge Investment Program Bridge Grants



Source: GAO illustrations and analysis of the Federal Highway Administration data for the Fiscal Year 2022 Bridge Investment Program. | GAO-25-107227

Appendix V: Comments from the Department of Transportation



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

Assistant Secretary
for Administration

1200 New Jersey Ave., SE
Washington, DC 20590

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

November 15, 2024

Dear Ms. Repko:

The mission of the Federal Highway Administration (FHWA) is to deliver a world-class system that advances safe, efficient, equitable, and sustainable mobility choices for all while strengthening the Nation's economy. Efforts are continually reaffirmed through the myriad of programs, both formula and discretionary, that are implemented by FHWA. FHWA's Bridge Investment Program is a competitive, discretionary program that focuses on the replacement, rehabilitation, preservation, and protection of existing bridges across the country to reduce the overall number of those bridges either in poor condition, or in fair condition and at risk of declining into poor condition. In efforts to ensure FHWA is effectively administering the program, FHWA continues to analyze and collaborate to determine best practices in implementing the discretionary grant programs under its purview to continually improve upon and enhance consistency across the Agency. Recent improvements include:

- Introduction of a Notice of Funding Opportunities (NOFO) for Fiscal Years (FY) 2023-2026 - Large Bridge Project Grants and FYs 2023-2026 - Planning and Bridge Project Grants, to split out the funding categories to better differentiate between their requirements.
- Development of a Benefit Cost Analysis (BCA) tool to help applicants summarize project costs and benefits and to reduce the potential applicant burden to fulfill BCA requirements.
- Development of Smart Application Templates for each sub-program to assist applicants in developing their applications, automatically pull National Bridge Inventory data, and identify narrative items to be addressed by applicants.

These improvements helped to significantly improve the eligible projects for selection from 7 in FY 2022 to 21 in FY 2024 for Large Bridge Project grants and 10 in FY 2022 to 46 in FY 2024 for Bridge Project grants.

Upon review of the draft report, FHWA concurs with GAO's two recommendations to: (1) improve instructions for reviewers on how to conduct and document their evaluation of applications in the Bridge Investment Program evaluation plan, and (2) create additional instructions for reviewers on how to conduct and document the quality control process to ensure all applications are consistently evaluated. DOT will provide a detailed response to the recommendations within 180 days of the final GAO report issuance.

We appreciate the opportunity to review the GAO draft report. Please contact Hari Kalla, Associate Administrator for Infrastructure at Hari.Kalla@dot.gov, or Joey Hartmann, Director, Office of Bridges & Structures at Joey.Hartmann@dot.gov with any questions.

Sincerely,

Philip A. McNamara
Assistant Secretary for Administration

Appendix VI: GAO Contact and Staff Acknowledgments

GAO Contact

Elizabeth Repko at (202) 512-2834 or RepkoE@gao.gov

Staff Acknowledgments

In addition to the contact named above, Joanie Lofgren (Assistant Director), Catrin Jones (Analyst in Charge), Audrey Blumenfeld, Sandra Sokol, Amy Rosewarne, Geoffrey Hamilton, Malika Williams, Samuel Portnow, and Kelly Rubin made key contributions to this report.

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