U.S. Department of Transportation

Fiscal Year 2026 Federal Planning Finding

State of Tennessee

FHWA Tennessee Division

FTA Region IV

July 2026

U.S. Department of Transportation

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Executive Summary

The Federal Highway Administration (FHWA) Tennessee Division and Federal Transit Administration (FTA) Region 4 find, based upon the **May 26, 2026**, submittal of the Federal Fiscal Years (FY) 2026-2029 Statewide Transportation Improvement Program (STIP), that the statewide and metropolitan transportation planning and programming processes being carried out in the State of Tennessee meet the requirements of Title 23 United States Code (U.S.C.) Parts 134 & 135; 49 U.S.C. Parts 5303 & 5304; 23 Code of Federal Regulations (CFR) Part 450; and 49 CFR Part 613.

The FHWA Tennessee Division and FTA Region IV Office jointly find that the Tennessee Department of Transportation's (TDOT) FY2026-2029 Statewide Transportation Improvement Program (STIP) is based on a continuing, cooperative, and comprehensive statewide transportation planning process that meets the requirements of 23 U.S.C. 134 and 135, 49 U.S.C. 5303 and 5304, and subparts A, B, and C of 23 CFR 450.

The FHWA Tennessee Division and FTA Region IV Office jointly find that each metropolitan FY2026-2029 TIP is consistent with the corresponding Metropolitan Transportation Plan produced by the continuing and comprehensive transportation process carried on cooperatively by the respective metropolitan planning organizations (MPO), State(s), and public transportation operator(s) in accordance with 23 U.S.C. 134 and 49 U.S.C. 5303.

The FHWA Tennessee Division and FTA Region IV Office formed this finding in a data analysis including, among other activities, a desk review of TDOT's statewide transportation planning products and MPOs' metropolitan transportation planning products and interviews with selected MPO representations.

The joint review identified **no corrective actions, two (2) commendations, and four (4) recommendations** to further improve the state of practice for transportation planning.

Commendations

- **STIP Development and Administration – eSTIP Development:** TDOT's Planning Division is commended for implementing an electronic STIP (eSTIP) platform, which should result in STIP process enhancements.

- **MPO Program Administration and Coordination:** TDOT's Planning Division has taken great efforts to communicate effectively with the MPOs by hosting regularly scheduled meetings and incorporating various communication platforms such as

newsletters and apps. Annual meetings help to facilitate a mechanism for convening transportation planning information.

Recommendations

- **STIP Development:**
  - TDOT, in coordination with the MPOs and FHWA/FTA, should establish and adhere to a consistent schedule for submission of the STIP/TIPs for Federal review and approval. This schedule should align with a logical recurring deadline, such as the start of a new Federal or State fiscal year. Creating a reliable process for submission of the STIP will increase accountability of all partner agencies and help mitigate any uncertainty and undue burden of managing multiple STIPs/TIPs. This recommendation is continued from the previous Federal Planning Finding (FPF) report.
  - **Public Involvement – Public Involvement Plan**: While the current Statewide Public Involvement Plan (PIP) meets regulatory requirements and TDOT is adhering to the process established in the Plan, the document is dated. TDOT should complete the update to the 2007 Statewide PIP, including the submission to Federal partners for review.

- **Financial Planning:** It is recommended that TDOT reassess the STIP fiscal constraint tables when the new transportation bill is available. TDOT Planning Staff are encouraged to continue their review of TIP amendments and modifications submittals to ensure that they meet the thresholds for federal action.

- **MPO Program Administration and Coordination:** TDOT and the MPOs should continue to work jointly to avoid delays or miscommunication in program delivery, especially with the implementation of the new eSTIP platform.

- **Air Quality Conformity (Rural Areas):** TDOT should adequately document how rural areas such as Shelby, Sevier, and Blount Counties handle air quality conformity. If partnership exists with MPOs, they should be documented.

Background

The Federal Highway Administration Tennessee Division (FHWA) and Federal Transit Administration Region 4 (FTA) are required under 23 CFR 450.220(b), to document and issue a Federal Planning Finding (FPF) in conjunction with the approval of a new or amended Statewide Transportation Improvement Program (STIP) and incorporated Transportation Improvement Programs (TIPs). The FPF verifies, at a minimum, that the development of the STIP is consistent with the provisions of the statewide and metropolitan transportation planning requirements of 23 U.S.C. 134 & 135; 49 U.S.C. 5303 & 5304; 23 CFR 450; and 49 CFR 613.

This report substantiates the issuance of the FPF to support FHWA and FTA approval of the STIP based on the review of STIP and TIP documents, statewide and metropolitan planning self-certification statements (23 CFR 450.220; 23 CFR 450.336), day-to-day stewardship and oversight activities, federal Transportation Management Areas certification reviews, and related supporting documentation.

Purpose and Objective

The purpose of this report is to document the Statewide Planning Finding for the Tennessee Department of Transportation's (TDOT) fiscal years (FY) 2026-2029 Statewide Transportation Improvement Program (STIP) and the associated Transportation Improvement Programs (TIPs) for the following metropolitan planning organizations (MPOs):

- Bristol Metropolitan Planning Organization,
- Chattanooga-Hamilton County / North Georgia Transportation Planning Organization,
- Clarksville Urbanized Area Metropolitan Planning Organization,
- Cleveland Urban Area Metropolitan Planning Organization,
- Jackson Area Metropolitan Planning Organization,
- Johnson City Metropolitan Transportation Planning Organization,
- Kingsport Metropolitan Transportation Planning Organization,
- Knoxville Regional Transportation Planning Organization,
- Lakeway Area Metropolitan Transportation Planning Organization,
- Memphis Urban Area Metropolitan Planning Organization, and
- Nashville Area Metropolitan Planning Organization.

The Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) have joint responsibility to ensure that the statewide and metropolitan transportation planning processes in Tennessee meet the Federal planning requirements in Titles 23 and 49 of the United States Code (U.S.C.) and Titles 23 and 49 of the Code of Federal Regulations (CFR).

The regulations in 23 CFR 450.220 require FHWA and FTA to make a joint finding on the extent to which the STIP is based on a continuing, cooperative, and comprehensive statewide transportation planning process that meets the requirements of 23 U.S.C. 134 and 135, 49 U.S.C. 5303 and 5304, and subparts A, B, and C of 23 CFR 450. Additionally, the regulations in 23 CFR 450.330 require FHWA and FTA to jointly find that each metropolitan TIP is consistent with the corresponding Metropolitan Transportation Plan produced by the continuing and comprehensive transportation process carried on cooperatively by the respective MPO, State(s), and public transportation operator(s) in accordance with 23 U.S.C. 134 and 49 U.S.C. 5303.

If FHWA and FTA determine that the STIP and incorporated TIPs are developed based on continuing, cooperative, and comprehensive statewide and metropolitan transportation planning and programming processes that meet the requirements of 23 U.S.C. 134 and 135, 49 U.S.C. 5303 and 5304, the Federal agencies may jointly:

1. Approve the entire STIP,
2. Approve the STIP subject to certain corrective actions being taken, or

3. Under special circumstances, approve a partial STIP covering only a portion of the State.

Federal approval of the FY2026-2029 STIP, in its entirety or in part, will be based upon the results of this Federal Planning Finding.

Scope, Methodology, and Outcomes

Risk-Based Federal Planning Finding Scope

The scope of the FPF includes the statewide transportation planning and programming process and the metropolitan planning and programming processes being carried out cooperatively by TDOT, Tennessee's eleven Metropolitan Planning Organization (MPOs), and Tennessee's providers of public transportation, as described in Title 23 U.S.C. 134 and 135, 49 U.S.C. 5303 and 5304, and 23 CFR 450.

Given the breadth of subject areas over which the statewide and metropolitan transportation planning process encompasses, the FHWA and FTA use a risk-based approach in conducting the FPF by focusing on the topics determined to be of highest threat or opportunity in carrying out the transportation planning requirements. This decision was informed by considerations such as recent Federal reviews, presence and applicability of documentation to existing practices, technical expertise at TDOT and the MPOs, and areas of significant opportunity or threat based on ongoing stewardship and oversight.

Based on these considerations, the focus areas identified for this review include:

- Statewide Long Range Transportation Plan,
- STIP Development,
- Performance-Based Planning and Programming,
- Financial Planning
- MPO Program Administration and Coordination, and
- Air Quality Conformity

Applying a risk-based approach enabled the FHWA and FTA to focus on these priority areas of greatest value to the review.

Federal Review Team

The FHWA and FTA assembled a Federal Review Team to carry out the Federal Planning Finding. The team included the following members:

- FHWA Tennessee Division & FHWA Supporting Divisions
    - Sonya Baker, Acting Program Delivery Team Lead, FHWA TN Division
    - Dysha Weems, Finance and Administration Team Lead, FHWA TN Division
    - Jacinda Russell, Field Operations & Engineering Team Lead, FHWA TN Division
    - Nathan Marshall, Structural Engineer, FHWA Tennessee Division
    - Nicketa Mathena, Financial Specialist, FHWA Tennessee Division
    - Kara Greathouse, Community Planner, FHWA West Virginia Division

    - Kim Thurman, Project Delivery Team Lead, FHWA Mississippi Division
    - Necole Baker, Transportation Planner, FHWA Mississippi Division
    - Tameka Macon-Ryan, Community Planner, FHWA HQ Planning
- FTA Region IV
    - Richelle Gosman, Lead Transportation Program Specialist
    - Andres Ramirez, Community Planner

Federal Review Finding Methodology

The review of the statewide and metropolitan planning processes included a desk review of statewide and metropolitan transportation planning and programming documents and outreach with TDOT and planning partners.

Federal Review Finding Outcomes

This FPF report documents and summarizes the review performed by the Federal Review Team. This review is demonstrated through observations and findings. Each review area is structured with the following:

- Observations are statements that explain the condition of statewide and metropolitan transportation planning and programming processes. Observations are used to compare practices and outcomes against regulatory standards.

- Findings are conclusions identified by the Federal Review Team based directly on the observations, and act as the official record identifying areas where the FHWA and FTA find strengths and opportunities for improvement. Findings are classified by the following:

    - *Corrective actions* are items that do not meet the requirements of the applicable Federal rules and regulations. FHWA and FTA expect TDOT and the MPOs to address corrective actions in accordance with prescribed timelines to achieve specific outcomes.

    - *Recommendations* concern the state of practice or technical improvements that would enhance existing processes and procedures. Many of the recommendations in this report reflect national trends and best practices. FHWA and FTA request TDOT and the MPOs to give due consideration to the implementation of recommended actions to enhance the respective statewide and metropolitan transportation planning activities. Such areas also provide a foundation to identify areas where FHWA/FTA training and technical assistance may be beneficial.

    - *Commendations* highlight noteworthy practices and activities that demonstrate innovative or highly effective procedures for implementing the

Federal planning requirements. Commendations may be cited as best practices to other States and MPOs.

Observations and Findings

The following observations and findings summarize the Federal Review Team's understanding and conclusions of the statewide planning process, as collected through the desk review, planning program area discussions, and ongoing federal stewardship and oversight of the planning processes.

FY 2023 Federal Planning Findings

Observations

The previous FPF was issued on June 21, 2023, in conjunction with Federal approval of the FY 2023-2026 STIP. From that review, the Federal Review Team identified

The FY 2023 FPF provided one (1) commendation and 3 recommended process improvements for TDOT and MPO consideration. These recommendations are provided in the previous report and available upon request.

FY 23 Commendation

• ***Financial Planning:*** *TDOT and the MPOs are commended for the process employed to fiscally constrain the STIP. TDOT and the MPOs worked jointly to identify and implement actions necessary to respond and communicate accordingly with project sponsors. This process demonstrated several cooperative activities across TDOT Divisions and with the MPOs, which should be applied early in development of the next STIP to ensure effective project programming.*

FY 23 Recommendations

• ***MPO Program Administration and Coordination:*** *TDOT and the MPOs should jointly develop and document the roles and responsibilities for administration of the MPO program, including a directory of relevant TDOT staff. Official notifications of staffing changes need to be communicated in a timely fashion in an effort for seamless transitions of responsibility and to avoid any delays or miscommunication in program delivery.*

• ***STIP Development:*** *TDOT, in coordination with the MPOs and FHWA/FTA, should establish and adhere to a consistent schedule for submission of the STIP/TIPs for Federal review and approval. This schedule should align with a logical recurring deadline, such as the start of a new Federal or State fiscal year. Creating a reliable process for submission of the STIP will increase accountability of all partner agencies and help mitigate any uncertainty and undue burden of managing multiple STIPs/TIPs.*

• ***Financial Planning:*** *TDOT and the MPOs should develop and document comprehensive financial planning efforts to establish revenue and cost estimates resulting in reliable and consistent assumptions, information, and forecasts.*

Through this FY 2026 FPF, TDOT self-reported their strategies in collaboration with the Metropolitan Planning Organizations (MPOs) towards these recommendations. TDOT noted where they are updating the MPO manual which defines roles and responsibilities, maintaining a centralized TDOT Staff Directory, and implementing regular coordinated meetings. TDOT collaborated with the MPOs to develop uniform assumptions for inflation rates, revenue projections, and cost estimates. TDOT, FHWA, and FTA have jointly reviewed the current Memorandum of Agreement (MOA) for STIP administration activities. This draft MOA is under review.

The FHWA and FTA acknowledge significant progress toward improving the MPO Program Administration and Coordination, deserving of a commendation. Previous recommendations have continued within this FPF including STIP development, Financial Planning, and MPO administration and coordination.

Review Area: Statewide Long Range Transportation Plan (SLRTP)

Observations

23 CFR 450.216 requires the State to develop a Statewide Long Range Transportation Plan (SLRTP) that provides for the development and implementation of the multimodal transportation system; the plan is required to have a minimum 20-year horizon and should be updated when significant changes occur in funding or priorities.

TDOT completed Phase 1 and published a 2025 Statewide Transportation Policy Plan update in December 2025. Now, TDOT has begun Phase II of its development of the corridor-focused 2055 Statewide Long-Range Transportation Plan. Additionally, a 10-Year Strategic Investment Plan was developed, which established fiscally constrained program investments in line with the 25-Year Policy Plan.

This policy update to the SLRTP followed regulatory requirements to include performance measures, performance targets, and a system performance report. TDOT is pursuing a full report update by the 2027 calendar year.

The website reference is: Final 2025 Policy Plan.pdf

Findings

None.

Review Area: STIP Development

Observations

Project Prioritization & Selection

The primary driver of the project prioritization process for inclusion in the STIP is TDOT's 10-year Project Plan which is a fiscally constrained planning and prioritization tool. (see Figure 1).

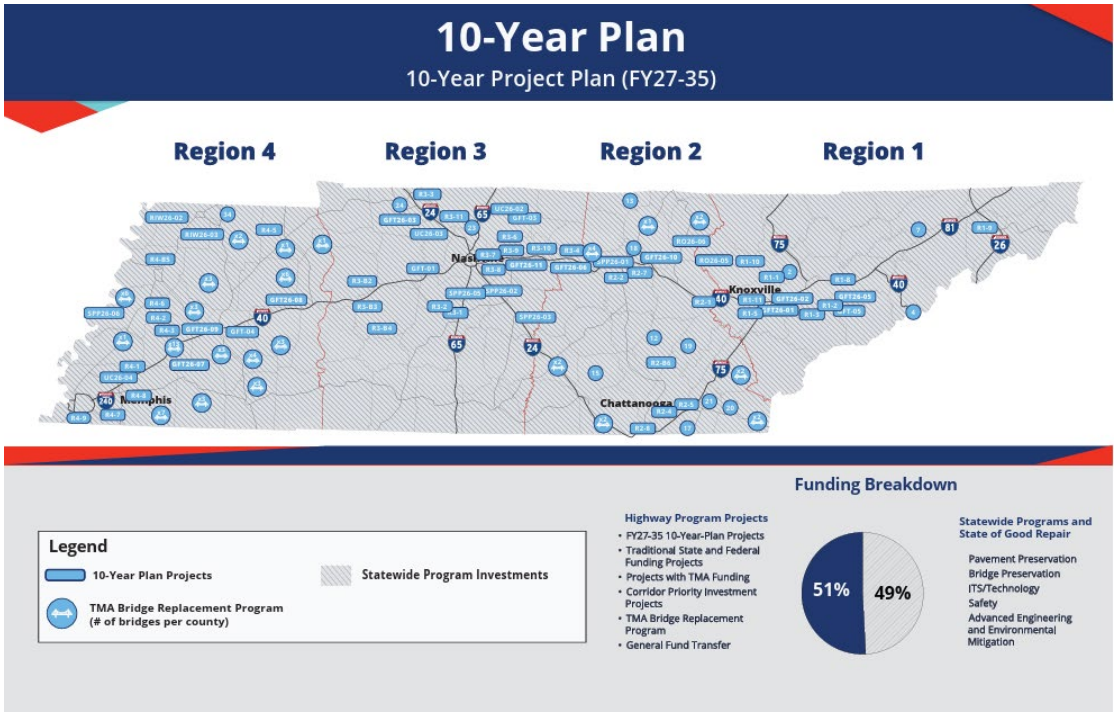


Figure 1. TDOT's 10-Year Plan (FY 27-35)

Since 2024, TDOT has been utilizing the 10-year project plan process to prioritize projects across Tennessee to better align with newly established procedures and priorities. This plan is a fiscally constrained projection of surface transportation projects and investment over a 10-year period. These projects are integrated into the STIP. Project selection is based upon available federal and state funds and involves the local agencies and MPOs.

TDOT utilizes an application process for local entities' projects to be considered in the 10-year plan. TDOT prioritzation procrss considers project delivery, performance, delivery time and cost. The selected panel expressed that TDOT offers transpency in the project selection process. TDOT also offers opportunity for local agencies and MPOs to request a debrief for projects that are not selected.

STIP Development and Submission Schedule

To prepare for the submission of the STIP for Federal review and approval, TDOT developed a schedule outlining the review process and key milestones for the MPOs, TDOT, and FHWA/FTA. The submission process is generally outlined across a 12-month period, culminating in receiving Federal approval of the STIP. However, because of organizational changes at both TDOT and FHWA TN Division Office, the schedule had been adjusted.

The initial draft submission of the FY 2026-2029 STIP occurred in February 2026, during the public involvement phase. This approach allows for simultaneous federal and public input. Reviewers returned initial comments to TDOT in March 2026, noting potential findings.

TDOT resubmitted the final draft STIP in May 2026. During the same period, TDOT initiated the on-boarding process for their new eSTIP platform and provided training for both the MPOs and federal partners on the system.

TDOT and the MPOs are managing overlapping STIPs and TIPs for both the FY 2023 - FY 2026 and the FY 2026-2029 periods. New TIPs were adopted prior to the approval of the upcoming STIP which led to some confusion. FY 26-29 STIP approval remained the basis for the approval of the FY 26-29 TIPs.

FHWA and FTA encourage TDOT and the MPOs to cooperatively establish a consistent STIP submission schedule that further demands accountability of all partnering agencies. The schedule should aim to lessen any undue burden agencies may experience due to managing overlapping STIPs/TIPs. Additionally, TDOT's advancement of the eSTIP platform will require continuous coordination with all partners to achieve successful implementation of the new platform.

Public Involvement/Outreach

TDOT's current Public Involvement Plan (PIP) was published in 2007. TDOT followed these procedures in the development of the current STIP update. However, the PIP references outdated transportation acts, physical addresses, etc. It is recommended that this document be updated before updating statewide planning documents.

TDOT also incorporated the Rural Planning Organizations in soliciting comments from the public and informing local officials.

Findings

***Recommendation(s)*:**

TDOT, in coordination with the MPOs and FHWA/FTA, should establish and adhere to a consistent schedule for submission of the STIP/TIPs for Federal review and approval. This schedule should align with a logical recurring deadline, such as the start of a new Federal or State fiscal year. Creating a reliable process for submission of the STIP will increase accountability of all partner agencies and help mitigate any uncertainty and undue burden of managing multiple STIPs/TIPs. Moving forward with the eSTIP platform will take continuous coordination with all partners to successfully implement TDOT's new eSTIP platform.

Public Involvement – Public Involvement Plan: While the current Statewide Public Involvement Plan (PIP) meets regulatory requirements and TDOT is adhering to the process established in the Plan, the document is dated. TDOT should complete the update to the 2007 Statewide PIP, including the submittal to Federal partners for review.

Review Area: Performance-Based Planning and Programming

Observations

State DOTs, MPOs, and public transit operators are required to engage in a performance-based approach to planning - referred to as Performance-Based Planning and Programming (PBPP). PBPP requires transportation planning agencies to set data-driven performance targets, establish performance measures, and program projects to meet those targets. Effectively, PBPP creates a framework for TDOT and the MPOs to make efficient investment decisions to achieve desired performance outcomes for the transportation system across the state (see Figure 2).

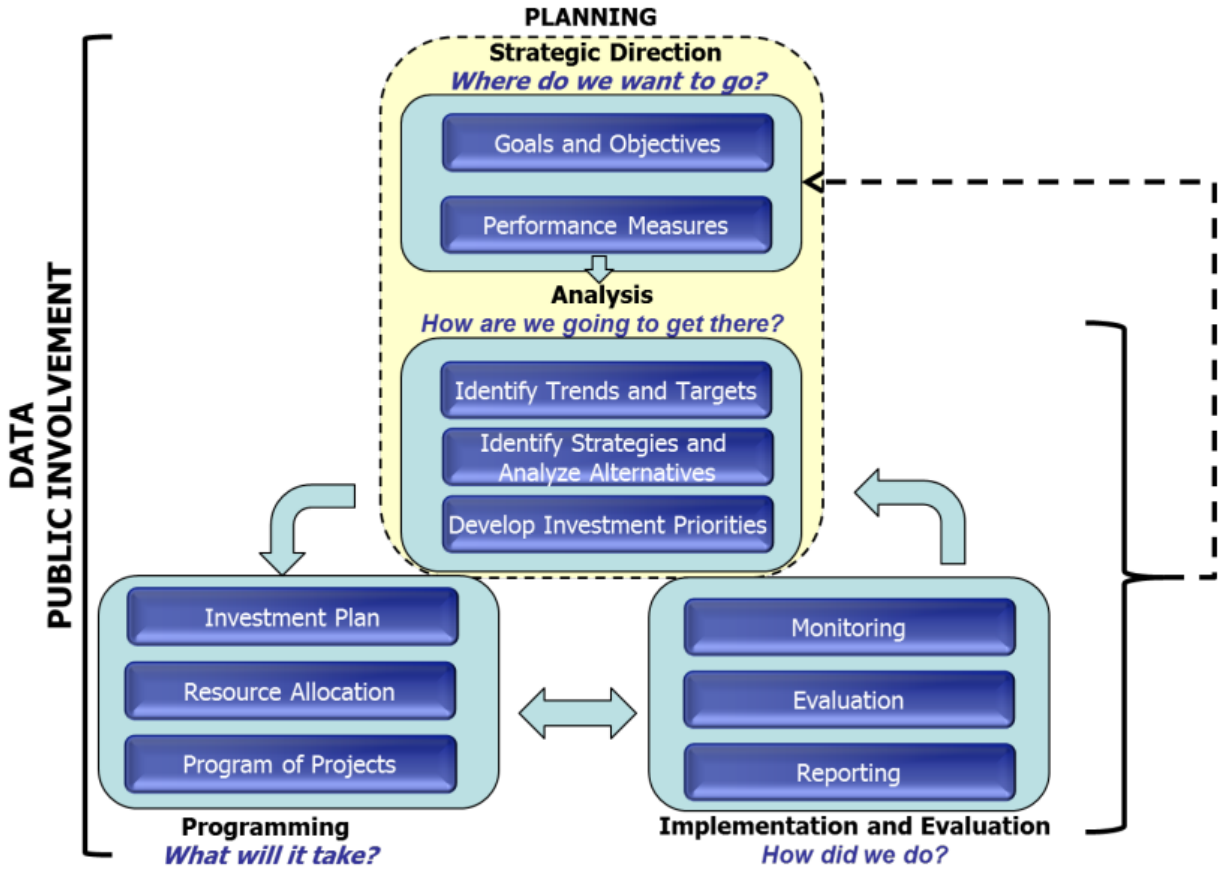


Figure 2. PBPP Framework

Since May 27, 2018, STIPs/TIPs are required to include, to the maximum extent practicable, a discussion of the anticipated effect of the STIP/TIP toward achieving the performance targets identified in the SLRTP, metropolitan transportation plan, or other performance-based plan(s), linking investment priorities to those performance targets. The STIP/TIP, once implemented, must make progress towards achieving established performance targets.

Findings

None.

Review Area: Financial Planning

Observations

Fiscal Constraint

Per 23 CFR 450.218(m), “financial constraint of the STIP shall be demonstrated and maintained by year.” Fiscal constraint requires that revenues (Federal, State, local, and private) are identified and “are reasonably expected to be available” to implement the STIP.

The initial draft submission of the FY 2026-2029 STIP had a potential finding of not being fiscally constrained by year, missing programmed funding for the Congestion Mitigation and Air Quality Improvement (CMAQ) Program, and missing the Transit project listings. The resubmittal corrected these areas by including the applicable documents.

At this time of this review, the transportation bill, IIJA, will be expiring as of September 30, 2026, and forecasted funding is based upon FY 2026 apportionments. It is recommended that TDOT reassess its financial constraint tables when a new transportation bill is available.

TDOT, FHWA, and FTA are drafting revisions to the *Memorandum of Agreement among the FHWA Tennessee Division Office, FTA Region IV, and TDOT regarding the Definition and Need for Amendments/Administrative Modifications to the STIP/TIPs in the State of Tennessee* to document the appropriate actions for amending or modifying the STIP to maintain fiscal constraint in the case where there has been a funding flex transfer.

TDOT should review MPO amendments and modifications for accuracy prior to submission for federal approval. The implementation of the eSTIP and update of the MOA will help to ensure steps are documented. However, TDOT staff are encouraged to continue their review of TIP amendments and modifications submittals to ensure that they meet the thresholds for federal action.

Findings

Recommendation(s):
It is recommended that TDOT reassess the STIP fiscal constraint tables when the new transportation bill is available.

TDOT Planning Staff are encouraged to continue their review of TIP amendments and modifications submittals to ensure that they meet the thresholds for federal action.

Review Area: MPO Program Administration and Coordination

Observations

In carrying out the FPF, the FHWA and FTA engaged with TDOT's planning partners for their feedback on the State's planning and programming process. In particular, as one of TDOT's most critical planning partners, the Federal Review Team sought feedback from Tennessee's MPOs. A representative panel of MPO/RPO staff feedback was obtained.

While the MPOs recognize the workforce challenges most organizations, including TDOT, are currently facing, the MPOs expressed the need for increased consistency, accountability, and communication from the State DOT. From the perspective of MPO staff, there is opportunity for TDOT to define the roles and responsibilities for staff who assist in the administration of the MPO program, making it clearer and more efficient to effectively collaborate between TDOT and the MPOs in program delivery.

Specific program improvements by the sample panel expressed to the Federal Review Team include:

- TDOT's administrative changes, including staffing and implementing a new eSTIP platform, can have both positive and negative effects on program improvement. The eSTIP will improve the amendment process. However, new staff must be trained on reviewing amendment requests from MPOs.
- Encourage early coordination on the STIP/TIPs schedule with the MPOs.
    - TDOT should consider the Air Quality Conformity Timelines during the STIP development
- Update of the current MOA for STIP amendments and modification
- Review of the current TIP cycle, which currently causes a holding pattern until the new STIP is approved. TDOT should consider an alternate cycle (i.e, two-year reevaluation to avoid the overlapping of documents)
- Continued improvement of the information being shared with MPOs about State-led projects, including providing accurate project statuses, refined cost information, and project timelines.

FHWA and FTA encourage TDOT to keep making efforts to improve the administration of the MPO program and work to institutionalize how the agency provides oversight of the metropolitan planning process. Clarity in communication and consistency in application are necessary to ensure that expectations are clear and to foster a more predictable process for TDOT and the MPOs.

Findings

Commendation: TDOT Planning Division has taken great efforts to communicate effective with the MPOs by hosting regularly scheduled meetings and incorporating various communication platforms such newsletters and apps. Annual meetings help to facilitate a mechanism for convening transportation planning information.

Recommendation**:** TDOT and the MPOs should continue to work jointly to avoid delays or miscommunication in program delivery, especially with the implementation of the new eSTIP platform.

Review Area: Air Quality Conformity (Rural Areas)

Observations

In reviewing the initial draft STIP, it was recommended that 23 CFR 450.218(b) that clarifying language be included regarding applicable MPOs that are subject to air conformity and how areas outside the metropolitan areas handle air conformity. TDOT should update maps and review projects to make sure that they are “exempt” within the correct counties.

Findings

> ***Recommendation*****:** TDOT should adequately document how rural areas such as Shelby, Sevier, and Blount Counties, handle air quality conformity. If partnership exists with MPOs, they should be documented.

Conclusion

The FHWA and FTA find that the STIP meets the requirements of U.S.C. 134, 135; 49 U.S.C. 5303-5305; 23 CFR part 450 and 500, and 49 CFR part 613. In addition, FHWA and FTA offer recommendations for improvement to support the State and MPO planning processes.

Commendation

- **STIP Development and Administration – eSTIP Development:** TDOT's Planning Division is commended for undertaking development of an eSTIP platform which should result in STIP process enhancements.

- **MPO Program Administration and Coordination:** TDOT Planning Division has taken great efforts to communicate effectively with the MPOs by hosting regularly scheduled meetings and incorporating various communication platforms such as newsletters and apps. Annual meetings help to facilitate a mechanism for convening transportation planning information.

Recommendations

- **STIP Development:**
    - TDOT, in coordination with the MPOs and FHWA/FTA, should establish and adhere to a consistent schedule for submission of the STIP/TIPs for Federal review and approval. This schedule should align with a logical recurring deadline, such as the start of a new Federal or State fiscal year. Creating a reliable process for submission of the STIP will increase accountability of all partner agencies and help mitigate any uncertainty and undue burden of managing multiple STIPs/TIPs.
    - **Public Involvement – Public Involvement Plan***:* While the current Statewide Public Involvement Plan (PIP) meets regulatory requirements and TDOT is adhering to the process established in the Plan, the document is dated. TDOT should complete the update to the 2007 Statewide PIP, including the submittal to Federal partners for review.

- **Financial Planning:** It is recommended that TDOT reassess the STIP fiscal constraint tables when the new transportation bill is available. TDOT Planning Staff are encouraged to continue their review of TIP amendments and modifications submittals to ensure that they meet the thresholds for federal action.

- **MPO Program Administration and Coordination:** TDOT and the MPOs should continue to work jointly to avoid delays or miscommunication in program delivery, especially with the implementation of the new eSTIP platform.

- **Air Quality Conformity (Rural Areas):** TDOT should adequately document how rural areas such as Shelby, Sevier, and Blount Counties handle air quality conformity. If partnership exists with MPOs, they should be documented.



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