



**ENHANCED MOBILITY OF SENIORS AND
INDIVIDUALS WITH DISABILITIES
(SECTION 5310) FUNDS**

PROGRAM MANAGEMENT PLAN

CITY OF ASHEVILLE

APRIL 2015

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5310 Enhanced Mobility of Seniors and Individuals With Disabilities Program

Background and Overview

The current federal law for surface transportation programs, Moving Ahead for Progress in the 21st Century (MAP-21), became effective on July 6, 2012. MAP-21 replaced the previous surface transportation programs law, SAFETEA-LU.

Transportation projects specifically intended to improve the mobility of seniors and individuals with disabilities, previously funded under the New Freedom program, are now funded under the Section 5310 program.

In accordance with the Federal Transit Administration's (FTA) Circular 9070.1G, this Program Management Plan (PMP) documents and describes the methods or processes used by the City of Asheville, the designated recipient of the Section 5310 funds for the French Broad River Metropolitan Organization, to solicit, select, award and administer Section 5310 funds. The funds come from the FTA and are awarded through the City of Asheville to qualified public and private transportation service providers in the FBRMPO's urbanized area for the purpose of enhancing the mobility of seniors and individuals with disabilities. This plan essentially serves as a guide to the annual project selection, monitoring and compliance process. A copy of this plan will be filed with FTA (Region IV) office.

The partnership of the FBRMPO and City of Asheville has made feasible the development of the Section 5310 program. The FBRMPO currently heads the development and coordination of the region's public and human service transportation initiatives, as required by MAP-21, with the goal of helping to improve or enhance transportation services and options for residents in the metropolitan area, who may be low income dwellers, handicapped, seniors, children or transit-dependent through a better coordinated transportation plan; and City of Asheville is the designated recipient for Section 5310 funds. The FBRMPO will be responsible for the planning process and grantee selection, and will be coordinating the application process. The City of Asheville will be responsible for the overall administration of the Section 5310 program.

The primary goal of this Program Management Plan is to increase personal mobility and travel options for seniors and individuals with disabilities through the coordination of existing and future services.

Program Purpose and Goals

FTA has defined the goal of the Section 5310 program, in the Circular FTA C 9070.1G; "to improve mobility for seniors and individuals with disabilities throughout the country by removing barriers to transportation services and

expanding the transportation mobility options available.” Toward this goal, FTA provides financial assistance for transportation services planned, designed, and carried out to meet the transportation needs of seniors and individuals with disabilities. The 5310 program will be administered towards the goals and strategic objectives found in the FBRMPO Coordinated Public Transit – Human Services Transportation Plan.

The main purpose of Section 5310, according to the Circular, is to fund traditional 5310 projects—those public transportation capital projects planned, designed, and carried out to meet the specific needs of seniors and individuals with disabilities when public transportation is insufficient, unavailable, or inappropriate. The secondary purpose is to fund other projects that exceed the ADA minimum requirements, improve access to fixed-route service and decrease reliance by individuals with disabilities on ADA-complementary paratransit service, or provide alternatives to public transportation that assist seniors and individuals with disabilities with transportation.

Roles and Responsibilities

The designated recipient of Section 5310 funds in urbanized areas over 200,000 in population has the principal authority and responsibility for administering these programs. The designated recipient must be officially designated through a process consistent with FTA Circular 9070.1G: “An entity designated, in accordance with the planning process under sections 5303 and 5304 of title 49, United States Code, by the governor of a state, responsible local officials, and publicly owned operators of public transportation, to receive and apportion amounts under 49 U.S.C. 5336 to urbanized areas of 200,000 or more in population; or a state or regional authority, if the authority is responsible under the laws of a state for a capital project and for financing and directly providing public transportation.” The City of Asheville is the designated recipient of the Section 5310 grant. On an annual basis, the FBRMPO will solicit, receive and select proposals for funding from both private and public transportation providers from across the FBRMPO region. Also, the FBRMPO will assume the primary responsibilities associated with the competitive selection process, including:

- Notifying eligible local entities of funding availability
- Advertisements
- Developing selection criteria
- Determining applicant eligibility
- Selecting projects for funding
- Ensuring that all sub-recipients comply with Federal requirements
- Inclusion of the “selected” projects in the Metropolitan Transportation Improvement Program (MTIP), as well as inclusion in the State Transportation Improvement Program (STIP)

Long-term goals for providing transportation services

Long term goals for providing transportation services, including to the target populations, are set down in the FBRMPO long range transportation plan (LRTP), which plans through 2035, and in the jointly adopted NCDOT Comprehensive Transportation Plan for the three counties in the MPO. One of the 2035 LRTP's stated goals is to ensure that the transportation plan benefits, and is equitable towards elderly, disabled, low-income, and minority populations. The long range transportation plan is developed by the MPO in concert with its residents. Public involvement is a major portion of plan development, and is a continuing part of MPO processes. The MPO staff is advised by the Technical Coordinating Committee, which includes representatives from each member government, and is governed by the Transportation Advisory Committee, which includes elected representatives of each member government. All meetings are open to the public, and each meeting of the Transportation Advisory Committee, includes opportunity for public comment as a part of its published agenda.

Coordination

Section 5310 funding must be implemented effectively and efficiently. One way to provide quality service under these constraints is to coordinate agencies and projects. As part of the application to the competitive selection process, potential applications will be asked to identify any inter-agency and/or service coordination efforts they have been engaged in, as well as any financial partnership that they may be a part of.

These are important portions of the application and have the ability to either negatively impact or increase the chances that a project sponsor will secure Section 5310 funding. The FBRMPO will coordinate the planning and implementation of the grant program with the Technical Coordinating Committee (TCC) and the Board on all transportation planning and service within the region. Likewise, the services related to this program will be coordinated with both public and private providers including taxicabs, retirement communities, and universities transportation services; public providers such as ART, Mountain Mobility, and Apple County, Human Service Agencies and County Community Service agencies.

Eligible Sub-recipients

Section 5310 is a formula grant program for member jurisdictions in the French Broad River Metropolitan Planning Organization. There are three categories of eligible sub-recipients of Section 5310 funds:

- Private non-profit organizations. A non-profit organization is a corporation or association determined by the Secretary of the Treasury to be an

- organization described by 26 U.S.C. 501(c) which is exempt from taxation under 26 U.S.C. 501(a) or one which has been determined under State law to be non-profit and for which the designated State agency or urbanized area designated recipient has received documentation certifying the status of the non-profit organization;
- State or local governmental authority; and
 - Operators of public transportation services, including private operators of public transportation services

Only transportation-related programs that fall within the Metropolitan Planning Area will qualify for funding. As noted above, the funds are open to all state or local government's authorities; private non-profit organizations; and operators of public transportation services including private operators of public transportation services.

Local Share and Local Funding Requirements

According to the FTA, Section 5310 funds can be used to support up to 80 percent (80/20 match) for capital projects, and no more than 50 percent (50/50 match) for projects for operating assistance. Section 5310 funds may be used to finance capital, planning and operating expenses. The Federal share of eligible capital and planning costs may not exceed 80 percent of the net cost of the activity. The Federal share of the eligible operating costs may not exceed 50 percent of the net operating costs of the activity. Recipients may use up to 10 percent of their apportionment to support program administrative costs including administration, planning, and technical assistance, which may be funded at 100 percent Federal share.

FOR SECTION 5310 FUNDS, ALL OF THE LOCAL SHARE MUST BE PROVIDED FROM SOURCES OTHER THAN FEDERAL DEPARTMENT OF TRANSPORTATION FUNDS.

Matching share requirements are flexible to encourage coordination with other federal programs that may provide transportation, such as Health and Human Service or Medicaid.

Some examples of sources of local match which may be used for any or the entire local shares include:

- State or local appropriations;
- Other non-DOT Federal funds that are eligible to be expended for transportation
- Private donations;
- Revenue from human service contracts;
- Net income generated from advertising and concessions.

- Non-cash share such as donations, volunteered services, or in-kind contributions is eligible to be counted toward the local match as long as the value of each is documented and supported, AND is a cost that will otherwise be eligible under the program.
- Income from contracts to provide human service transportation.

Exceptions to Local Match Requirements for Section 5310

The federal share is 90% for vehicle-related equipment and facilities required by the Clean Air Act (CAA) or the Americans with Disabilities Act of 1990 (ADA). The federal share is 85% for the acquisition of vehicles for purposes of complying with or maintaining compliance with ADA or the CAA. A revenue vehicle that complies with 49 CFR part 38 may be funded at 85 percent federal share. Sponsors wishing to apply for assistance at the higher match ratio should consult the FTA Region 4 offices for further guidance regarding methods of computing this incremental cost. This step must be completed prior to submitting an application for federal assistance to the FBRMPO.

Local match may be derived from other Federal funds derived from Federal programs that are eligible to be expended for transportation, other than from the DOT programs.

Examples of types of programs that are potential sources of local match for Section 5310 include:

- employment training,
- medical,
- community services, and
- rehabilitation services.

To be eligible for local match for FTA funds, the other Federal funds must be used for activities included in the total net project costs of the FTA grant. Expenditure of other Federal funds for transportation outside of the scope of the project cannot be applied as a credit for local match in the FTA grant. Specific program information for other types of Federal funding is available at www.unitedweride.gov.

Project Selection Criteria and Method of Distributing Funds

Projects funds will be awarded through a competitive selection process. In order to comply with the funding requirements, the city may make recommendations to fulfill traditional projects, in case this is not feasible through the competitive process. The process will begin each year during the spring with a call for projects and, receipt of applications by the FBRMPO staff or its designee. Applications will then be forwarded to the FBRMPO's Technical Coordinating Committee (TCC). The TCC chairperson may choose to appoint a subcommittee

to review and score applications and make recommendation to the TCC based on the responsiveness of individual applications, or the entire TCC may review and score all applications and make a recommendation based on the responsiveness of individual applications. Members of the TCC are very familiar with local human service agencies, the target population documented in the local coordinated transportation plan, and the transportation issues affecting this target population.

After scoring the proposals, the TCC will make project selection and funding recommendations to the FBRMPO Board and the City. The City will then review the recommended applications to ensure compliance with the program. Following the City's review, the Board will have the final vote on the selection and funding of the recommended projects. The list of selected projects will then be published and submitted to the FTA for funding.

All proposals should reflect public transportation and human service transportation priorities documented in the Coordinated Public Transportation – Human Services Transportation Plan (CPT-HSTP). The recommended 5310-eligible transportation priority needs currently identified by the FBRMPO are listed below:

1. Extend Mountain Mobility's service hours, especially evenings
2. Provide short-notice on-demand trips, such as immediate transportation for medical/illness that does not require an ambulance; also same-day notice trips for situations where a client has been dropped off and is "stuck" with no way to get home; for example hospital patients being released at 11 PM.
3. Improve the safety of pedestrian crossings and appropriate signal timing, particularly important for seniors who might be currently deterred from crossing the street
4. Improved ADA accessibility and visibility at the ART Station
5. Better travel options between Buncombe and neighboring counties (Haywood, Henderson, Madison, Yancey and Mitchell), especially for medical trips
6. Provide transit travel training and pedestrian safety education for citizens who need it, including seniors, young adults and potentially individuals with disabilities
7. Coordination with school boards and intergovernmental agreements to use school buses for senior transportation after and in-between school hours
8. Assist individuals with disabilities to be able to retrofit their own private vehicles with ADA equipment--potential in cooperation with Division of Vocational Rehabilitation Services regarding grant funding for this purpose
9. Help make fares more affordable for those who need it; Provide discounted/free transit passes, especially for Vocational Solutions/Sheltered Workshop clients
10. Lower age limit to 60 for free City of Asheville bus passes

Annual Program of Projects Development and Approval Process

The federal transportation law, MAP-21, requires that projects receiving funding under the Section 5310 program must be “derived from a locally developed, coordinated public transit - human services transportation plan.” Rather than developing specific strategies, services, or projects for funding, the FBRMPO CPT-HST Plan identifies top priority needs to be addressed.

This allows the flexibility of applicants to propose strategies for addressing these needs, and puts the FBRMPO in the position of evaluating competing proposals, as required under the federal guidance. The project selection process will be conducted annually, as long as Section 5310 grant funds are available.

The solicitation of projects will be announced as early in each calendar year as is feasible, to provide applicants with ample time to develop complete proposals. All applicants will be required to submit a completed application. Applications will be reviewed and scored by the TCC or a subcommittee of the TCC appointed by the TCC Chair. This subcommittee will make funding recommendations to the TCC and the City. The City will then review the recommended applications to ensure compliance with the program. Following the City’s review, the TCC will make final recommendations to the Board.

The criteria recommended for use in evaluation of competing applications are listed below. The intent is that the selected projects each year will enable all the stakeholders to cooperatively move toward a coordinated transportation system. This will better serves the needs of all our customers, but particularly those who have traditionally been transportation-disadvantaged.

All applications must meet the following:

1. The proposed project must be a non-duplicative service or program.
2. Eligible matching funds must be identified and available.
3. The proposed project must be a new or expanded service or program.
4. The primary focus of the proposed service or program must serve the target populations, namely seniors and individuals with disabilities
5. The project must benefit the French Broad River MPO urbanized area.

Eligible applications will then be evaluated on the following criteria:

a. *Project Needs/Goals and Objectives (30 points):* The project should directly address priority transportation needs identified through the French Broad River MPO’s locally developed Coordinated Public Transportation - Human Services Transportation Plan available at www.fbrmpo.org or by calling the FBRMPO offices. Project application should clearly state the overall program goals and objectives, and demonstrate how the project is consistent with the

objectives of the Section 5310 grant program. The project application should indicate the number of persons expected to be served, and the number of trips (or other units of service) expected to be provided.

b. Implementation Plan and Evaluation (20 points): For all projects, applicants must provide a well-defined service operations plan and/or capital procurement plan, and describe implementation steps and timelines for carrying out the plan. The implementation plan should identify key personnel assigned to this project and their qualifications. Project sponsors should demonstrate their institutional capability to carry out the service delivery aspect of the project as described.

c. Project Budget (15 points): Applicants must submit a clearly defined project budget, indicating anticipated project expenditures and revenues, including documentation of matching funds. Proposals should address long-term efforts and identify potential funding sources for sustaining the service beyond the grant period.

d. Partnerships and Program Outreach (20 points): Proposed projects will be evaluated based on their ability to coordinate with other public transportation, community transportation and/or social service resources. Project sponsors should clearly identify project stakeholders, and how they will keep stakeholders involved and informed throughout the project. Project sponsors should also describe how they will promote public awareness of the project. Letters of support from key stakeholders and/or customers should be attached to the grant application.

e. Program Effectiveness and Performance Indicators (10 points): The project will be scored based on the project sponsor's ability to demonstrate that the proposed project is the most appropriate match of service delivery to the need, and is a cost-effective approach. Project sponsors must also identify clear, measurable outcome-based performance measures to track the effectiveness of the service in meeting the identified goals. A plan should be provided for ongoing monitoring and evaluation of the service, and steps to be taken if original goals are not achieved. Sponsor should describe their steps to measure the effectiveness and magnitude of the impact that the project will have on the target populations, seniors and individuals with a disability.

f. Innovation (5 points): The project will be examined to see if it contains new or innovative service concepts or facilities that have the potential for improving access and mobility for the target populations and may have future application elsewhere in the region.

g. Alternative Fuels/Fuel Efficiency (Bonus 5 points): Projects that demonstrate the use of high-efficiency or alternative fueled vehicles/transportation methods will receive 5 bonus points.

The TCC and Board will review and make all necessary updates to the program as it deems necessary.

Administration, Planning and Technical Assistance

Designated recipients of Section 5310 funding may utilize up to 10% of each yearly apportionment to support program administrative costs including administration, planning, and technical assistance. This activity may be funded entirely by federal funds and does not require a local match. The City of Asheville being the designated recipient will utilize allowable funds up to 10% of the total apportionment.

These funds will offset the cost of overhead and staff salaries associated with application process, project approval and grant management activities, as well as offering support to the competitive selection process and updates to the Coordinated Human Services Transportation Plan.

Transfer of funds

There is no authority to transfer Section 5310 funds awarded to the grant recipient or subrecipients. Upon successful program selection, City of Asheville will apply for grants and pass-through funds to subrecipients under the guideline outlined in this PMP and consistent with pass-through agreements.

Private Sector Participation

To the extent possible, the FBRMPO will provide equal and adequate access for all public and private transportation and human service providers in the Metropolitan area to enable them apply for the grant, and if qualified, receive funding from the program.

Civil Rights

The City of Asheville shall require that subrecipients recommended for federal funding submit all project appropriate FTA certifications and assurances prior to contract execution and annually thereafter. These include, but are not limited to:

- Standard Assurances
- Nondiscrimination Assurances
- Private Mass Transportation Companies
- Assurance of Nondiscrimination on the Basis of Disability

The COA will not execute any grant contract without having first received these items. The City shall exercise an active oversight role with regard to the equipment procurement process. The FBRMPO shall require that bidding

documents for vehicles or other equipment be in compliance with Subpart D, 49 CFR, Part 26. This requirement relates to the purchase of goods and/or services from disadvantaged business enterprises (DBE). Subrecipients are required to annually report purchases made from DBE vendors and provide a description of their good faith efforts to locate and purchase from DBE vendors. The City's DBE liaison will work with subrecipients to ensure compliance.

The COA will ensure that all fund recipients comply with federal civil rights requirements related to the execution of the funded project. The COA will also ensure that recipients of the funds provide equal access and mobility for any person without regard to race, color or national origin.

Consequently, the City will make certain that projects funded by the grant have in place adequate measures to meet or exceed federal Title VI assurance and DBE goals, and provide fair, equitable service to minority women, children and the elderly population in the course of executing the funds. Also, the FBRMPO, in the process of selecting fund recipients will make sure that potential fund recipients have incorporated minority programs into their proposal and that the disadvantaged population group have been given due consideration and are not harmed by the execution of the project.

Section 504 and ADA Reporting

The City's project funding guidelines will guarantee that all program funded by Section 5310 money comply with all Section 504 and ADA rules and regulations. Accordingly, all applicants will be made to certify that their respective projects comply with all applicable rules and regulations related to Section 504 and ADA. Also, program selection will be made with Section 504 and ADA compliance requirements in mind and the level of compliance may influence the selection of a program. Additionally, the city will require that funded recipients have endorsement from other human service agencies that cater to the needs of ADA clients. Also, any ADA violation by a fund recipient may be ground for termination of the funds. The FBRMPO will notify each grant recipient at the time of the grant award that allegations made in regards to discrimination in service or employment, including Section 504 and ADA will be reported and investigated. The City's Transportation Planning Division may be contacted by anyone alleging discrimination in service or employment, including Section 504 and ADA. Subrecipients must be in compliance with Section 504 ADA requirements. Any written complaints alleging discrimination will be referred to the City of Asheville's Transportation Planning Division.

Drug and alcohol programs

The City will ensure that all the subrecipients recommended for federal funding under the Section 5310 program comply with the federal drug and alcohol requirements. Consequently, the City will make certain that projects funded by

the grant have in place adequate measures to meet or exceed federal drug and alcohol program requirements. The subrecipients must comply with city's policy regarding drug and alcohol and their safety-sensitive employees will be monitored periodically according to the policy.

Oversight Procedures

Subrecipients must comply with the City of Asheville's Oversight Procedures, last updated on March 10, 2014, which are found in Attachment A. Subrecipients are responsible for maintaining compliance with the City's oversight policies, which are revised periodically.

Program Measures

The reporting and data collection measures for the Section 5310 Program will be prescribed in the grant agreements with subrecipients. Subrecipients will be required to collect the following specific data for Section 5310 programs:

- Services provided that impact availability of transportation services for individuals with disabilities as a result of the Section 5310 projects implemented in the current reporting year. Examples include geographic coverage, service quality and/or service times.
- Additions or changes to environmental infrastructure (e.g., transportation facilities, sidewalks, etc), technology, vehicles that impact availability of transportation services as a result of the Section 5310 projects implemented in the current reporting year.
- Actual or estimated number of rides (as measured by one-way trips) provided for individuals with disabilities as a result of Section 5310 projects implemented in the current reporting year.

On a quarterly basis, all fund recipients will provide reports to the fund administrator. Such reports will be required when invoices are submitted for payment by the recipient.

Once a year, the COA will review the benchmarks and make necessary notations as may be required to ensure that the recipients are in full compliance and are also doing what they said they were going to do. Overall the program administration will ensure that:

- All applicants, both public and private, are given equal opportunity to submit application for financial assistance under this program.
- All recipients understand the purpose of the funding program, general reporting standards, and requirements set by the program administrators.
- All recipients and sub-recipients are in compliance with the requirements contained in the provisions of the program, including the provision of all relevant information or reports related to the execution of the program.

Designated Recipient Program Management

The daily monitoring as well as management of the program will be done by the designated recipient, the City of Asheville. All procurement emanating from the grant must comply with the established compliance guidelines set by the program. In cases of gross mismanagement, fraud or non-performance of the project, the COA will set in motion a process to cut off funds, involve the City of Asheville's attorneys or do both. In some cases assets acquired with funds from the program may be taken away or transferred to other agencies to ensure that public funds are not wasted but put to proper use.

The City will refer to the circular C5010.1D for Grant Management Requirements to ensure compliance.

Additionally the City of Asheville will establish the following annual process for managing the program:

- Establish timeline and procedure for announcing, selecting, disbursing funds and monitoring of programs.
- Establish procedure for developing updates and maintaining local standards for compliance with the program.
- Establish internal guidelines for making determinations of compliance with the program, and contract administration.
- Conduct end-of –program assessment to assure that all goals were met and also the program complied with all requirements of the guidelines established.
- Provide avenue for further review, updates or amendments to the local program requirement.

Financial Management and Project Monitoring

The designated recipient, the City of Asheville maintain financial management systems for financial reporting, accounting records, internal controls, and budget controls subject to standards specified in state laws enforced by the State Auditor, the State Office of Financial Management, and the Legislative Transportation Committee. All systems and procedures for financial management are in compliance with 49 CFR 18.20.

A. Appropriate Expenditures

1. Salaries and payroll additive costs, transportation expenses, and office and other expendable supplies for all work provided in the approved planning work program.

2. Printing, copying, keypunching, computer processing, mapping and aerial photography costs are required for carrying out the work provided in the planning program.
3. Purchases of special equipment.
4. The Employment of Consultants must be in accordance with procedures approved by City of Asheville and FTA. All contracts or agreement with consultants or contractors must be submitted to the City. Payments to DBEs must be reported to the City.
5. Reimbursement of other city agencies, municipalities, counties, regional and state agencies for expenses incurred in conducting work provided for in the planning work program.
6. Auditing costs associated with fulfilling the requirements of 2 CFR Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

B. Accounting Procedures

1. A separate account should be established for the Section 5310 funds for each fiscal year and all transactions recorded in accordance with acceptable accounting procedures which are approved by the City and FTA. 2 CFR Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards outlines standards for grantee financial management systems.
2. The account established for the planning funds will be included in the annual audit of the agency in accordance with 2 CFR Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.
3. Time spent for staff services on work provided for in planning work program should be recorded by work task on either standard monthly, weekly, or biweekly time sheets for each individual and filed for audit purposes.
4. Cost for capital and operating (i.e., transportation, office and other expendable supplies, printing, copying work, keypunching, computer processing) should be supported by receipts, logs and vouchers as appropriate.
5. Reimbursement of other city agencies, municipalities, counties, regional and state agencies should be on a basis of vouchers submitted and supported by similar documents as required of the lead agencies. The vouchers should, as a minimum, specify the staff time expended and work task for which the reimbursement is requested.
6. The total amount of funds specified in the approved Section 5310 program will be the controlling amount for which reimbursement can be claimed for a given fiscal year. It is recognized that the amount to be spent on each task will vary somewhat from that estimated in the program.

Identification of expenditures by work task in a quarterly progress report will ensure that work is being accomplished in accordance with the program and provide guidance in estimating costs for work to be accomplished in succeeding fiscal years.

C. Reimbursement Procedures

Sub recipients invoices should be submitted to the designated recipient, the City of Asheville, each quarter. The invoices and accompanying reports should be submitted within 15 days of the end of the quarter. The invoice should indicate the total amount of federal grant funds and matching funds expended during the subject period and the amount being requested for reimbursement. An invoice should include an attached quarterly expenditure report by work task.

D. Quarterly Progress Report Procedures

Quarterly progress reports, invoices and expenditures should be submitted to the COA. The quarterly progress report should include a brief narrative report of transportation planning work accomplished by the planning agency and any sub-contractor. The quarterly progress report shall be included with that invoice and expenditures report.

E. Annual Performance Report

An annual performance report is to be submitted with the final planning funds invoice submission for a fiscal year (July 1 – June 30). The written narrative of the performance report should (1) compare work accomplishments to anticipated work goal; (2) discuss progress in meeting schedules; (3) comment on significant task cost overruns/underruns; (4) identify any approved amendments; and (5) discuss any items of interest, i.e. reorganization and personnel changes.

F. Sub Recipients

The aforementioned Section 5310 Funds procedure and requirements apply to subrecipients.

Sub-recipients shall send appropriate materials and documents to the designated recipient, the City of Asheville.

Subrecipient Financial Management

The City of Asheville will develop and execute grant pass-through agreements with recipients of Section 5310 funds. All projects related capital and operating assistance expenditures are expected to be incurred locally. All grant agreements for capital projects shall detail the equipment approved for purchase and its intended use. Agreements for operations assistance outline the type of service provided by the subrecipient, the time period covered by the agreement, and the service area. The City of Asheville shall reimburse the subrecipient with the federal funds based on the proportions identified on the grant agreement. However, the federal share on any project shall not exceed 80 percent for capital

projects and 50 percent for operations projects. Grant expenditures shall be identified in the City of Asheville Accounting and financial reporting tool called Munis.

Also, grant funding and expenditures shall be identified by federal grant number, grant program and subrecipient grant number. In the case of capital projects, subrecipients are required to attach copies of vendor invoices to reimbursement requests. Vehicle licensing and insurance are not eligible for reimbursement under a capital project. Sales and use taxes (excluding the local transit portion of sales tax) charged to the subrecipient for vehicles are eligible for reimbursement. The City of Asheville shall also maintain spreadsheets for each subrecipient. These spreadsheets track project expenditures, amounts charged to each funding source, local matching sources, and project budgets. Additional spreadsheets may be prepared which summarize the total expenditures on each grant.

Audits

Sub-recipients shall provide an audit report to the City of Asheville. The City of Asheville shall conduct a single audit consistent with the City's audit policies and procedures. These audits comply with OMB Super Circular. Auditor issues reports at the completion of the audits.

Subrecipients who are private non-profit organizations are required to obtain audits of their expenditures and operations annually by an independent audit firm if their agency has expended in excess of \$50,000 in the Federal fiscal year (October 1 – September 30). The audit firm must send a copy of the report to the COA the year after grant-related expenditures are incurred. Any questions raised during the audit must be resolved by the subrecipient and the audit firm preparing the audit report.

Close Out

For internal financial reasons, the City of Asheville closes projects several months after reimbursing the subrecipient for the last of its eligible expenditures. The process is one of the following:

1. Verification by the City of Asheville with the subrecipient's representative that all project expenditures have been incurred and reimbursed, or
2. All funding available in the subrecipient agreement has been reimbursed, or
3. The project has come to the end of its 3-year term (operating projects).

Capital assistance has a term equivalent to the useful life of the equipment purchased, which may be up to twelve years after acceptance of the equipment.

The City of Asheville may amend or terminate capital assistance agreements when project equipment is transferred between subrecipients before its useful life has been reached. Operating assistance agreements have a term of 24 months and are not extended or closed prior to the end date of the agreement.

Procurement

Purchasing equipment under the § 5310 program may be conducted directly by the subrecipients, with City of Asheville oversight. The subrecipient may participate in the City's coordinated bid process, if desired. The City's role is to assure purchases are made competitively and in compliance with federal procurement policies, as established in FTA Circular 4220.1F – Third Party Contracting Guidance.

The City of Asheville requires that all bid documents and specifications prepared by the subrecipients be submitted for review and approval prior to seeking bids for vehicles, goods or other, to assure compliance with federal standards.

Property Management

Legal ownership of all vehicles purchased under the § 5310 program is retained by the transit operators and in the case of private provider, by the City of Asheville. When titling a vehicle, the private provider subrecipients are listed as "Registered Owner," responsible for licensing and collision insurance; and City of Asheville as "Legal Owner" and loss payee should anything happen to the vehicle.

The designated recipient shall design and maintain a database that contains all vehicle inventory records. Reports within this database distinguish between currently owned vehicles and those that have served their useful life and have been released to the subrecipient. The information in the database shall include, but is not limited to the subrecipient's name, address and phone number; vehicle year, make, and model; date accepted; included equipment; location; federal grant number and state agreement number; federal percentage share; date last inspected, recorded mileage, and condition; type of funding used for the purchase; and other information used by the City for program review and reporting. All information must be reported to COA annually for the fiscal year ending June 30.

Inventory Reports

Subrecipients will be required to submit an annual Owned Rolling Stock Inventory. The inventory will include the following information:

- Year/Make/Model
- Vehicle Code

- Vehicle Identification Number
- Agency Vehicle Number
- Condition
- Age
- Remaining Useful Life
- Replacement Cost
- ADA Access
- Seating Capacity
- Fuel Type
- Title

The information obtained from these inventories will become part of the inventory record along with the title and certificate of collision insurance coverage. To ensure that the vehicles are properly maintained, the designated recipient shall randomly review vehicle maintenance records and physically inspect vehicles as part of the on-site visits. These visits are conducted, at a minimum, every other year.

Reporting Requirements

Subrecipients are required to prepare a variety of reports on a quarterly basis. These include a project narrative, local matching sources used, number of passenger trips provided, vehicle miles traveled, and revenue service hours provided. They are also required to report on an annual basis their efforts in purchasing from DBE vendors and a vehicle condition report.

Vehicle, lift equipment and facility maintenance and inspection records

Subrecipients will be responsible for the maintenance of vehicles acquired with Section 5310 funds. The subrecipient will keep federally funded equipment and facilities in good operating order and develop written procedures for maintaining vehicles, facilities and equipment. The subrecipients must comply with the written procedures.

In the case of vehicles and equipment, the owner's manual and the lift equipment manual that is included with each vehicle, have a complete vehicle maintenance schedule. The schedules list the service functions and the service time intervals, in months or miles or cycles.

Each subrecipient is instructed to service the vehicle(s) and lift equipment, at a minimum, in accordance with the maintenance schedules, and to keep records to show that service was completed. During an annual inspection, COA will ask to review the maintenance records. COA will randomly pick maintenance reports to review. In addition, each agency will submit certification that service is completed at least as scheduled per the owner's manuals. Request for certification will be sent out annually by the COA.

Vehicle use requirement

Vehicle use is restricted to passenger transportation services and only for services for which grant project was approved. Subrecipients of capital grants for vehicles are expected to attain a minimum of 100 passenger service miles per week, per vehicle; or 100 one-way passenger trips per week per vehicle. Subrecipients may not transfer the operational control of a vehicle purchased under this program to anyone else without prior written approval from the City of Asheville.

Disposition at the End of a Vehicle's Useful Life

The City will require the sub-recipient to follow the guidance in C 5010.1D, Chapter IV, Section 3, or subsequent circulars, for the disposition of vehicles and useful life.

This will also apply for disposition prior to the end of the vehicle's useful life.

Other Provisions

The City of Asheville anticipates only funding projects with categorical exclusions from both the National Environmental Protection Act (NEPA) and the State Environmental Protection Act (SEPA). Therefore, there should be no further documentation necessary.

However, should a project be approved that is subject to environmental regulations, the City will ensure that the subrecipient meets all environmental requirements.

If such a project were funded, the City will require the subrecipient to submit all necessary documentation.

Regulations Associated with Vehicle Purchase

Subrecipients are required to submit a "Buy America" provision and certification with their bidding documents for vehicles.

Pre-award and post-delivery reviews

The COA will ensure that pre-award and post-delivery reviews are completed as specified in FTA regulations at 49 CFR part 663. The COA will ensure that an inspector will be placed in the manufacture site if a purchase of 10 or more vehicles is done using Section 5310. The cost of the pre-award and post-delivery reviews will be subrecipient's responsibility.

Restriction on Lobbying and Code of Ethics

The City of Asheville requires each subrecipient to complete FTA's Certification on Lobbying prior to contract execution. All bids for equipment prepared by these subrecipients are required to contain this certification as well. The City's contract with subrecipients shall require the development and implementation of a written code of ethics. All staff, officers, employees, board members or agents of the subrecipient are required to comply with the code of ethics. The City of Asheville shall verify compliance with this regulation during project monitoring visits.

Prohibition on Exclusive School Transportation

Title 49 U.S.C. 5323(f) prohibits the use of FTA funds for exclusive school bus transportation for school students and school personnel. Subrecipients may operate multi-functional vehicles which meet the safety requirements for school transportation, but may not provide exclusive school service.

Charter Bus Services

Title 49 U.S.C. 5323(d) limits charter service provided by federally assisted public transportation operators. These limitations are detailed in Circular 9070.1G.

Attachment A: City of Asheville Oversight Procedures

CITY OF ASHEVILLE CONTRACTOR AND SUBRECIPIENT OVERSIGHT PROCEDURES

March 10, 2014

Purpose

The purpose of these Contractor and Subrecipient Oversight Procedures is to:

- Ensure that all technical specifications and contract requirements are met by contractors and subrecipients.
- Monitor compliance with FTA requirements for FTA-funded vehicles or facilities that are maintained by subrecipients, leased to service providers, or maintained under contract by other than the City of Asheville employees.
- Identify performance issues and address them in a timely manner.
- Track information regarding performance quality for the purposes of evaluating contractors for future procurements.
- Ensure that all construction is performed in accordance with the design intent agreed upon in the original contract or through an approved change order or modification.

These procedures explain methods of monitoring, persons responsible, frequency, and expected deliverables associated with managing performance and compliance monitoring systems for rolling stock, construction, ADA paratransit, and fixed route services. Performance and compliance monitoring for third-party contractors is distinguished from compliance monitoring of subrecipients and public entities operating federally-funded services, rolling stock, and facilities.

Scope and Applicability

This Procedure applies to monitoring performance and compliance for the following types of projects/programs:

- Rolling Stock
- Construction
- ADA Paratransit, and/or Fixed Route, Services

The frequency and type of monitoring will be based upon the following: a) size of the grant or contract, b) associated risks, c) service complexity, and d) type of grant or contract.

References to Legislative and Regulatory Documents

- FTA Circular 4220.1F, “Third Party Contracting Guidance”
- 49 CFR Part 18
- OMB Super Circular

Definitions

- **Contractor Performance Monitoring:** The process by which the City of Asheville oversees and tracks contractor performance to ensure that the performance and quality assurance standards set forth in the contract/solicitation are met. Performance requirements are specified in solicitations such as Request for Proposals and are included in contracts. Performance measures typically relate to scheduling/timeliness, customer service, and nonconformance. Performance data is also considered in the evaluation of a particular contractor for participation in future projects.
- **Contractor Compliance Monitoring:** When federally-funded services, rolling stock, and facilities are operated by a contractor other than The City of Asheville, they must be subject to regular reviews by the City to ensure compliance with FTA requirements.
- **Subrecipient Compliance Monitoring:** When federally-funded services, rolling stock, and facilities are operated by a subrecipient or public entity other than the City of Asheville, they must be subject to regular reviews by the City of Asheville to ensure compliance with FTA requirements.

General Oversight Procedures for Services Providers

▪ Title VI Monitoring Procedures

The subrecipient or third-party contractor must ensure that no person shall, on the grounds of race, color, or national origin, be excluded from participating in, or be denied the benefits of, or be subject to discrimination under any program, or activity receiving Federal financial assistance. The subrecipient must ensure that Federally supported transit services and related benefits are distributed in an equitable manner.

Subrecipients and third-party contractors are responsible for ensuring that they comply with Title VI requirements such as; notifying customers of their rights under Title VI; having Title VI complaint procedures; taking reasonable steps to ensure access to Limited English Proficiency (LEP) populations; and seeking out the viewpoints of minority, low-income and LEP populations when conducting public outreach and involvement activities. The City of Asheville should be informed of any Title VI complaints received by its subrecipients or third-party contractors.

Key Requirements:

- Subrecipients and third-party contractors delivering transportation services with FTA funds must notify the City's Transportation Planning Manager immediately (within 48 hours) of any complaints received.
- Revisions to Title VI Plans must be submitted for approval to the City of Asheville. Revisions by sub-recipients will be required every three years when FTA requires the City to update its Title VI program.
- **Drug and Alcohol**

The City of Asheville requires its contractors and subrecipients to maintain records on Drug and Alcohol program administration and the test results of individuals for whom it has testing responsibility. The City of Asheville must take the following measures to monitor compliance with FTA requirements, 49 CFR Part 655 Prevention of Alcohol Misuse and Prohibited Drug Use in Transit Operations, as amended, and 49 CFR Part 40 Procedures for Transportation Workplace Drug and Alcohol Testing Programs, as amended.

- The City of Asheville will maintain Drug and Alcohol program records and require contractors and subrecipients in a secure location for a minimum of up to five (5) years.
- The City of Asheville will provide technical assistance in understanding and meeting the program requirements, and overseeing the drug and alcohol programs of third-party contractors with safety-sensitive employees.
- The City of Asheville will review third-party contractor programs using standardized compliance checklists to ensure that all required elements are present and that the right type of testing is conducted, the proper forms are used and completed correctly, and records are stored in a secure location and maintained for the required amount of time.
- The City of Asheville will ensure the quality of testing services by establishing a written contract with each testing provider and verifying that the vendor is HHS certified.
- The City of Asheville will require contractors and subrecipients to submit drug and alcohol testing records electronically monthly or quarterly and then conduct a site visit twice a year, , investigate reports of flawed procedures, and document training aimed at correcting any deficiencies.

- **Equal Employment Opportunity (EEO):**

Subrecipients and third-party contractors must ensure that no person in the United States shall on the grounds of race, color, religion, national origin, sex, age, or disability be excluded from participating in, or denied the benefits of, or be subject to discrimination in employment under any project, program, or activity receiving Federal financial assistance under the Federal transit laws. (Note: EEOC's regulation only identifies/recognizes religion and not creed as one of the protected groups.) Subrecipients and contractors that receive capital or operating assistance in excess of \$1 million or planning assistance in excess of \$250,000 and employ 50 or more transit related employees must submit to the City of Asheville an EEO plan. Program updates are due every three years.

- **Compliance Record Keeping**

The City of Asheville must fully document all compliance monitoring efforts conducted on subrecipients and third-party contractors. A "Compliance Monitoring File" should be created and maintained for each organization, which includes the following items:

- Pre-award assessment checklist
- Individual grant monitoring plan worksheet
- Periodic reports from subrecipient or third-party contractor
- Desk review monitoring report
- On-site visit report
- Telephone contact report
- Assistance report
- Corrective action plan
- Annual reports checklist
- Copies of e-mail, memos, or other written correspondence, including notification informing subrecipient or third-party contractor of the results of monitoring

In addition, the City of Asheville maintains evidence that vendors and contractors are being monitored to ensure they perform in accordance with the terms, conditions and specifications contained in their contracts or purchase orders. All records of inspections and approvals, deliverables provided or services performed are kept for evidence that the City of Asheville is making sure vendors and contractors adhere to contract requirements. The correspondence between the City and its contractors is stored for evidence of ongoing contract administration. Once an issue is discovered, the City follows up with its contractor to ensure that corrective action is taken. Efforts, including the follow-up on findings, are documented.

- **Public Comment Procedures**

Public Comment management is critical to successful program implementation. The City of Asheville receives daily comments and elicits public comment during each planning process. Additionally, the City must ensure that subrecipients and third-party contractors are meeting the needs of the public as well. The following method will be used to track public comments;

Conduct a bi-annual review of public comment data collected by subrecipients and third-party contractors. The City of Asheville maintains a formal Procedure for Considering Public Comments; this procedure applies to subrecipients and third-party contractors providing transit services, unless the subrecipient/contractor develop a procedure specific to their operations that is approved by the City of Asheville.

- **Final Financial and Program Reports Closeout**

The final financial and program reports must be submitted within 90 days of project completion or expiration of funding. All expenditure obligations must be paid prior to filing the final reports. The close out reports should be clearly identified as final. They must show that all activities and expenditures associated with the grant are completed and the grant is ready to close. The final program report should include a detailed description of the project with a focus on program outcomes.

The program report should include quantitative data regarding the effectiveness of the program, if applicable. The program report will detail how the program met the identified needs and the specific intentions of the grant award. If the subrecipient is unable to use all funds in a grant, the City of Asheville will reconcile and de-obligate remaining funds in the grant and will return the remaining funds to the FTA or other applicable grant making body.

The subrecipient and contractor will be required to maintain all books, documents, payroll documentation, accounting records, and other evidence pertaining to costs incurred under a federal grant awards during the period of the grant and for three years thereafter. These records must be available for inspection by any authorized representatives of the City of Asheville or the Federal Government.

Rolling Stock Oversight Procedures

To monitor FTA-funded vehicles or facilities that are maintained under contract by other than the City of Asheville employees, the City requires that contractors or subrecipients address maintenance standards or maintenance performance indicators. Contractors and subrecipients are required to develop their own maintenance plan and submit periodic written reports on maintenance activities. The City of Asheville must also conduct reviews of maintenance records and inspections of FTA-funded vehicles and facilities.

- **Buy America Pre-Award and Post-Delivery Audits**

A subrecipient or third-party contractor that purchases rolling stock for transportation

of passengers in revenue service must conduct, or cause to be conducted, a pre-award audit before entering into a formal contract for the purchase of rolling stock, and certify that a post-delivery audit is complete before title to the rolling stock is transferred to the subrecipient, or the rolling stock is put into revenue service, whichever occurs first. Pre-award and post-delivery audits verify the accuracy of the Buy America certification, purchaser's requirements certification, and certification of compliance with or inapplicability of Federal motor vehicle safety standards in 49 CFR part 571 (49 CFR part 663)

- **Disadvantaged Business Enterprise (DBE) Monitoring**

Subrecipients or third-party contractors shall require that, as a condition to bid on a transit vehicle procurement in which FTA funds are involved, each transit vehicle manufacturer certify that it has complied with the requirements of 49 CFR section 26.49. The City of Asheville may, with FTA approval, establish project-specific goals for DBE participation in the procurement of transit vehicles that a manufacturer must meet (49 CFR section 26.49(d)). All subrecipients and contractors must require that each transit vehicle manufacturer (TVM), as a condition of being authorized to bid on transit vehicle procurements funded by FTA, certify that it has complied with the requirements of 49 CFR 26.49. Subrecipients and contractors are required to include a provision in its bid specifications requiring the certification from TVMs as a condition of permission to bid. DBE reports are generated every 6 months.

Construction Oversight Procedures

Construction oversight is designed to ensure that the project is progressing in accordance with specifications, special provisions and plans, and methods and practices specified in construction manuals.

- **Contract Administration and Performance Monitoring**

The City of Asheville will implement the following Quality Assurance controls in the contract administration and monitoring of construction contractors:

- **Labor Compliance:** Spot-checked construction logs/diaries against certified payrolls for Davis-Bacon compliance. (Check 3 months after start of construction and quarterly for QA.)
- **Measurement and Payment:** Monitor that source documents supporting progress payments made to the contractor are available. (Spot-check after second progress payment to the contractor.)
- **EEO/Wage Rate Posters** – Observe the construction site, the contractor's office at the contractor office, or another central gathering point to verify that posters are visible for every worker to see. (Check one month after start of construction.)
- **Buy America** - Review the construction area and the contractor's on-site

yard, quarterly, and check to make sure foreign iron and steel products are not being incorporated into the project without resident engineer's approval or a FTA waiver.

Disadvantaged Business Enterprise (DBE) Monitoring

Third-party contractors must comply with 49 CFR Part 26 to ensure nondiscrimination in the award and administration of DOT-assisted contracts. Written DBE programs are required of FTA subrecipients of planning, capital, and/or operating assistance that will have contracting opportunities (excluding transit vehicle purchases) exceeding \$250,000 with those funds in a Federal fiscal year.

The City of Asheville and its subrecipients are required to follow the City of Asheville approved DBE program. The program will be updated by the City of Asheville every three years or when significant changes occur.

Subrecipients and prime contractors must following all aspects of the City of Asheville DBE Program:

1. A contract clause ensuring non-discrimination,
2. A contract clause requiring prompt payment and retainage,
3. Provision for DBE subcontractor termination and
4. Project invoicing must explicitly show progress on DBE goals.

DBE liaison must be invited to all project meetings to make sure DBE requirements and goals are met. Project updates must include an update on payments to DBE's and the overall DBE goal. DBE reports are generated every 6 months by the DBELO.

ADA Paratransit, Fixed Route, and Charter Services Oversight Procedures

In prohibiting discrimination in the provision of transportation services against persons with disabilities, the Americans with Disabilities Act of 1990 requires that vehicles purchased or leased after August 25, 1990, and new and altered facilities designed and constructed (as marked by the notice to proceed) after January 25, 1992, must comply with the applicable standards of accessibility in 49 CFR parts 37 and 38 (42 USC 12101-12213). The City of Asheville must ensure that subrecipients and third-party contractors comply with these standards of accessibility, including the provision of equivalent services.

▪ ADA Compliance Monitoring Procedures

Subrecipients and third-party contractors are required to follow titles II and III of the Americans with Disabilities Act (ADA) of 1990. ADA provides that no organization shall discriminate against an individual with a disability in connection with the provision of transportation service. The law sets forth specific requirements for a subrecipient's vehicle and facility accessibility and the provision of service, including complementary paratransit service.

The City of Asheville utilizes the following monitoring methods to ensure that third-party contractors or subrecipients operating ADA Paratransit services are in compliance:

1. Review the third-party contractor or subrecipient's ADA-related policies and monitor compliance with the policies. Review ADA complaints and the process & procedures for addressing American With Disabilities Act complaints.
2. Inform subrecipients and third-party contractors of the ADA requirements via training. This training is required to ensure that personnel operate vehicles and equipment safely, assist passengers properly, and treat persons with disabilities who use the service in a respectful and courteous way, with appropriate attention to the differences among persons with disabilities. All contracts for the operation of ADA Paratransit service must include mandatory driver training requirements. Training provisions must include requirements regarding curriculum, length of training period, resources, and assurances. Contracts must call for initial driver training and annual refresher trainings. Training programs must also include passenger assistance techniques and disability sensitivity modules.
3. Employ surveys, checklists and interview forms, as well as follow-up correspondence to effectively document compliance. All documentation reflecting monitoring results is maintained as evidence of oversight.
4. Maintain a record keeping system for monitoring on-time performance and tracking these indicators of capacity constraints. At any given time, the City of Asheville should be able to demonstrate that the denials it does have, as well as the missed trips, late pickups, etc., are not an operational pattern or practice that significantly limits the availability of ADA paratransit service.
5. Track ADA-eligible trips separately from non-eligible trips. Periodic reservation line calls must be conducted at various times of the day to determine if a caller can reach a reservation agent. If third-party contractors or subrecipients have communication systems that provide data on average call wait time, number of missed calls, call abandonment rates, and other indicators of performance, such data must be collected and reviewed to determine compliance.
6. Monitor service capacity constraints and review no-show policies.
7. Ensure that all subrecipient and third-party contractor vehicle accessibility features, such as wheelchair lifts, ramps, securement devices, signs, and communication equipment for persons with disabilities, be maintained and operational.

- **Fixed Route Service Monitoring**

For a contractor's or subrecipient's fixed route service supported with Section 5307 assistance, fares charged elderly persons, persons with disabilities or an individual

presenting a Medicare card during off peak hours will not be more than half the peak hour fare. The contractors and subrecipients are responsible for ensuring that contractors and lessees that operate services to which the half fare requirement applies follow applicable guidelines.

- **Subrecipient Maintenance Monitoring**

Subrecipients must keep Federally-funded equipment and facilities in good operating order and maintain ADA accessibility features.

- Subrecipients are required to have a current written maintenance program for FTA-funded rolling stock that documents the maintenance plan. The subrecipient must follow its maintenance program for facilities and equipment.
- The subrecipient's FTA-funded vehicles and facilities must be maintained regardless of who operates and maintains them. Third-party contractors and lessees "stand in the shoes" of the subrecipient and the City of Asheville as far as FTA maintenance requirements are concerned.
- If the subrecipient or contractor has equipment under warranty, FTA requires that the subrecipient or contractor have a system for identifying warranty claims, recording claims, and enforcing claims with the manufacturers.

- **Frequency of Performance Reviews and Oversight**

- At a minimum, formal performance reviews should be completed quarterly, with documented corrective actions, for larger and more complex projects.
- For contractors with multi-year contracts, a formal review every 12 months is necessary to assist in determining whether the contract should be extended.

Subrecipient / Service Provider Compliance Monitoring Checklist

Evaluation Area	Q1	Q2	Q3	Annual Onsite Review
Vehicle Maintenance Reviews (including wheelchair lifts and other accessibility features)				
Warranty Recovery Program				
Physical Inventory of FTA Property				
Vehicle Control System (including verification of intended use)				
Safety Policy Changes (Training)				
Driver Training				
Security & Emergency Mgmt Policy Changes (Training)				
Farebox Cash Counting Policy				
ADA Compliance				
Title VI Compliance				
DBE Goal Attainment				
Drug and Alcohol Contractor Monitoring				
Annual MIS Reports for D&A				

REVIEWER: _____

DATE: _____