

Revision #:	Initial
Implementation Date:	11/1/2020
Last Revision Date:	N/A

Spokane Transit Authority Subrecipient Oversight & Monitoring Procedures

Purpose

The purpose of these standard operating procedures is to ensure that grant funding allocated to eligible Section 5310 subrecipients are used for authorized purposes and in a manner consistent with applicable laws, regulations, and policies.

Scope

Intended for use by STA staff directly involved in administering the FTA Section 5310 program. The order of priority shall follow the outline in this document (Grant Application Review, Grant Application Scoring, Grant Agreement, etc.).

Prerequisites

- FTA C Circular 5010.1E – Award Management Requirements
- 2 CFR Part 200 – Uniform Administrative Requirements
- Spokane Transit Section 5310 Program Management Plan, as amended
- Spokane Transit Title VI Plan, as amended
- Spokane Transit Procurement Resolution (702-13, May 2019)

Responsibilities

- Assistant Transit Planner: will use this document as a guide to conduct daily activities to include reviewing applications for eligibility and compliance, processing invoices, preparing program and financial reports, providing technical assistance to subrecipients, conducting on-site monitoring reviews, and other duties as assigned.
- Principal Transit Planner: will keep this SOP up-to-date and current for use, provide general oversight for grant program deliverables, review and approve reimbursement requests, and provide training and support to the Assistant Transit Planner.
- Director of Planning and Development: Review and approve revisions to the SOP prior to implementation.
- Contract Compliance Specialist: will draft subrecipient agreements and amendments that meet standards outlined in 2 CFR Part 200.331 (a).
- Accounting/Finance Manager: will review all requests for payment to confirm that appropriate documentation is provided prior to reimbursement, including the local share (match) stipulated in the agreement(s) between Spokane Transit and its subrecipients.

Grant Application Review Procedures

The Section 5310 Call for Project(s) procedures are defined in the 'Section 5310 Program Management Plan.' Once applications are received, the Assistant Transit Planner will document that the following items were incorporated:

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- DUNS/EIN number,
- Suspension/Debarment, DBE, and Title VI certifications,
- Buy America certification (for construction and vehicle procurement projects only),
- Documentation signed by the organization's authorizing official (e.g. CEO or Board member) certifying the amount and funding source for the local share (match) commitment to include a clear description of any in-kind match contribution,
- Completed budget with sufficient narrative explanations for calculations used to determine the appropriate federal and local share of all project costs (by project type),
- Copy of the organization's federally approved indirect cost allocation plan (if such costs are included in the budget),
- Copy of the organization's most recent single audit (or audited financial statements, as applicable), including any management letters.

The Assistant Transit Planner shall provide a signed checklist to the Principal Transit Planner that includes a YES/NO response for each requirement listed above. The checklist will also be signed by the Principal Transit Planner and filed in the Section 5310 folder in share point. ****Only applications that meet these requirements will be forwarded to the scoring committee.***

If an application is not selected for consideration, the Principal Transit Planner will forward a letter to the organization listing the reason(s) for denial and the appeal process.

Grant Application Scoring Procedures

Applications will be scored in accordance with criteria listed in Spokane Transit's Section 5310 Program Management Plan. Two scoring checklists will be completed:

- 1) Project Application Checklist – which shall be completed by the Scoring Committee, and
- 2) Risk Assessment Checklist – which shall be completed by the Assistant Transit Planner and certified by the Principal Transit Planner.

Both checklists shall be completed prior to the Spokane Transit Planning & Development Committee meeting where Section 5310 funding recommendations are considered. Both checklists will be filed in the Section 5310 folder in share point.

Grant Agreement Procedures

- 1.) The Assistant Planner shall submit the agreement template request to the Contract Compliance Specialist when:
 - A FAIN (Federal Award Identification Number) has been assigned in TrAMS to that fiscal year's allocation, and
 - Funding recommendations have been approved by the STA Board.
- 2.) This request will be forwarded to the Principal Transit Planner with the following documentation: a screenshot from the System of Award Management (SAM) website that verifies that the

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subrecipient is not suspended or debarred. The screenshot will include the organization's name and/or EIN number, the website address, and date.

- 3.) The Assistant Planner will respond to and provide any information needed to complete the agreement template to include: funding award, fiscal year federal appropriation, organization contact information, project description, project type, etc. as required under 2 CFR Part 200.331(a).
- 4.) The final draft agreement shall be reviewed by the Principal Transit Planner before it is transmitted to the subrecipient for signature.
- 5.) The Assistant Transit Planner shall be responsible for updating the Section 5310 project tracking sheet(s) located in the Section 5310 folder in share point.

Subrecipient Notice Procedures

The Assistant Transit Planner shall be responsible for coordinating communication with Section 5310 subrecipients and internal departments. This correspondence will include, but is not limited to, award letters, agreements, monitoring reviews, monthly invoices, procurement documentation, and quarterly reporting. All communication will be filed in the Section 5310 folder in share point in the subrecipient's project file.

Requests or inquiries related to any grant agreement terms and/or deliverables shall be forwarded to the Principal Transit Planner for response.

Execution of Grant Agreement

The Contract Compliance Specialist shall be responsible for obtaining the necessary agreement signatures (via DocuSign) and sending executed copies to the distribution list.

The Assistant Transit Planner shall enter the project information into the Federal Funding Accountability and Transparency Act Subaward Reporting System (FSRS) after the agreement is executed. This shall occur ***no later than the last day of the month following the date of agreement execution.***

EXAMPLE: Agreement execution date - October 14, 2020
FSRS deadline – November 30, 2020

A screenshot shall be filed in the subrecipient's project file in share point and entered on the Section 5310 tracking sheet(s).

Subrecipient Deliverables

Subrecipients are subject to the same terms and conditions specified in the FTA – Spokane Transit Agreement. This includes all applicable federal regulations and requirements – including Title VI. These terms and conditions are specified, or incorporated by reference, in the subrecipient agreement.

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The Assistant Planner will send a request for any project deliverables **within 90 days of when the agreement is executed**. This will include, but is not limited to:

- The organization's Title VI Program Plan/Procedures, or
 - Certification from the subrecipient's authorizing official stating that the organization has adopted STA's Title VI Plan. Any modifications to this plan will be approved in advance.
- Also-
- Quarterly Reporting Schedule, template, and instructions
 - Monitoring Schedule

Invoices

Requests for reimbursement will be directed to the Assistant Transit Planner for eligibility review and internal processing. Reimbursement requests shall include appropriate and sufficient documentation to verify that the expenses are both allowable and allocable. Any questions or concerns should be forwarded to the Principal Transit Planner for response.

Monitoring Reviews

A monitoring schedule (and tracking sheet) shall be prepared and maintained by the Assistant Transit Planner. This tracking sheet shall include the dates, scope (vehicle records, financial, program performance), review status (open/closed), and contact information for each subrecipient.

Monitoring review summary letters shall be sent to subrecipients **no later than 30 days** after the monitoring review. These letters will include the date of the review, scope, and any findings or recommendations. These letters shall be signed by the Principal Transit Planner.

Grant Closeout & Reporting

The Principal Transit Planner will review the Section 5310 tracking sheets and financial reports each quarter to determine the timing of each project year grant closeout. The Principal Transit Planner shall consult with the Accounting/Finance Manager to reconcile project and program financial grant balances, as needed.

The Assistant Transit Planner will be responsible for preparing the annual Section 5310 reports that are submitted to the FTA by the Principal Transit Planner in TrAMS.

The Assistant Transit Planner and the Principal Transit Planner will conduct a desk audit to see if any program or project deliverables are pending prior to closing out the grant in TrAMS.