

Federal Transit Administration Enhanced Mobility of Seniors and Individuals with Disabilities Program (49 U.S.C 5310)

Program Management Plan

Prepared by:

Planning and Grants Department

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Section 1 - Introduction

The Spokane Transit Authority (STA) Program Management Plan (PMP) includes policies and procedures used to administer the Federal Transit Administration's (FTA) Enhanced Mobility of Seniors and Individuals with Disabilities Program (49 U.S.C 5310) - hereby referred to as the Section 5310 Program. Developed in accordance with FTA Circular C 9070.1G (July 7, 2014), the PMP was developed to help ensure that STA, as a designated recipient of Section 5310 funds, is administering Section 5310 in compliance with applicable federal statutes and regulations, including those activities undertaken by eligible subrecipients.

Purpose and Content of the PMP

The PMP includes procedures for administering and managing Section 5310 funds. At a minimum, the PMP must include a recipient's program objectives, policies, procedures, and administrative requirements, in a form readily accessible to potential subrecipients, recipient staff, FTA, and the public (C9070.1G Pg. VII-1).

PMP Review Process

The PMP is a living document. It will be updated regularly to incorporate any expansions and enhancements of the 5310 program, as well as any revisions to the program's management, requirements, or guidelines. The PMP will be updated per the request of the FTA or based on significant input submitted from subrecipients, eligible applicants and the general public. At minimum, the PMP will be submitted to FTA for review and approval every three years. The schedule for revising the PMP is listed below.

PMP FTA Review Schedule	
Year	Submittal Status
2020	Most recent FTA approved PMP
2023	Pending revisions & FTA's approval
2026	Upcoming

Administrative, minor, and technical revisions to the PMP and its attachments may be submitted to FTA in the form of page changes to update the current PMP but will not require additional FTA approval (FTA C 9070.1G Page VII-4). If substantial revisions to the PMP are required, STA will post the draft plan on its website and send a copy to interested parties (subrecipients, SRTC, WSDOT, and local jurisdictions) for a thirty-day comment period. Any comments received will be tracked and documented in the attachments of the final draft. The PMP will then be submitted to the FTA for comment and any comments received will be addressed in the attachments. STA will send notification of FTA's approval and the PMP to interested parties, will be posted the PMP on STA's website, and submit the final PMP to FTA (C9070.1G Pg.VII-4).

The 2020 Program Management Plan (PMP) was updated for the 2021,2022, and 2023 Call for Projects. These revisions include additional language for the unique circumstance of 100% federal match, the revised Call for Projects, Title VI Plan requirements, revised application scoring criteria, returned funds, and awarding funds. These revisions to the PMP are administrative changes to application requirements and updated program documents which are considered minor technical revisions did not warrant additional FTA approval.

Background and Program Goal

The Section 5310 grant program was established in 1975 (see FTA C 9070.1G Page I-6). The program started as a discretionary capital assistance program to award grants to private non-profit organizations

that serve the transportation needs for the elderly and persons with disabilities, in cases where public transit was unavailable, insufficient, or inappropriate. With the passage of the Intermodal Surface Transportation Efficiency Act (ISTEA) in 1991, funding for the 5310 Program was doubled and it became a statutory requirement to distribute funds by formula. Under ISTEA, public agencies also became eligible for funding in limited circumstances. No major program changes were made on the Transportation Equity Act for the 21st Century (TEA-21) that passed in 1998, but under the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), passed in 2005, a requirement that projects must be derived from a locally developed, Coordinated Public Transit – Human Services Plan (Coordinated Plan) was put in place. In 2012, passage of the Moving Ahead for Progress in the 21st Century (MAP-21) Act brought about significant program changes. With the passage of MAP-21, the New Freedom program (Section 5317) was repealed and combined with the Federal Transit Administration’s (FTA) Section 5310 Transportation for the Elderly and Disabled Grant Program to create the new Enhanced Mobility of Seniors and Individuals with Disabilities Program. As a result of the change, activities previously eligible for New Freedom funding are now eligible for 5310 funding. Funds are now apportioned to large urban areas, small urban areas, and rural areas instead of solely to the states. MAP-21 required that not less than 55% of a recipient’s apportionment be used for traditional 5310 projects.

The Bipartisan Infrastructure Law (BIL), also referred to as the Infrastructure Investment and Jobs Act (IIJA) is the Department of Transportation’s current funding legislation signed into law on November 15, 2021. During the COVID-19 pandemic, FTA allocated 100% federal funding to the Section 5310 apportionments as well as supplemental funding to provide relief to transportation providers.

The Coronavirus Aid, Relief, and Economic Security (CARES) Act of 2020 provided emergency assistance for those affected by the COVID-19 pandemic for unprogrammed 2021 funds and 2022 apportionment funds with no local match requirement.

The American Rescue Plan (ARP) Act of 2021 provided additional pandemic-associated assistance for transportation systems at 100% federal share with no local match requirement. The Coronavirus Response and Relief Supplemental Appropriations (CRRSAA) Act of 2021 provided supplemental appropriations for COVID-19 relief at 100% federal share with no local match requirement.

Local Goals and Strategies

Originally adopted by the STA Board of Directors on July 21, 2010, and most recently revised in May 2022, STA’s Comprehensive Plan, *Connect Spokane*, set forth a vision and policy framework to guide decisions made by its Board of Directors, staff, and partnering agencies for the next 30 years by means of coordinated regional planning efforts. Any further updates to *Connect Spokane* that impact the coordinated regional planning efforts will be updated in this PMP when available.

STA is actively involved with Spokane Regional Transportation Council (SRTC) in the local transportation planning process leading to the adoption and implementation of the Spokane County Public Transit-Human Services Transportation Plan (HSTP). The HSTP is required by state and federal agencies to demonstrate that appropriate coordination has occurred to develop regional programs and strategies which enhance transportation access, minimize duplication of services, and implement the most cost-effective transportation services using available resources. This planning process includes outreach to seniors and people with disabilities. The following HSTP strategies guide Section 5310 funding criteria:

- Maintain existing transportation services.
- Encourage service provider and public coordination.
- Educate the public on STA’s transit network by offering travel training programs and providing educational materials.
- Integrate subrecipient transportation services with Spokane Transit services.

- Strive to meet the necessities of special needs groups.
- Enhance the rider's experience by upgrading facilities including providing new buses, vans, and wheelchair lifts.
- Implement new technologies to help make transportation operations more efficient, safe, and attractive; and
- Encourage new and expanded services to meet unmet transportation needs.

The HSTP is required to be updated every four years and STA will partner with SRTC to update the plan. The HSTP was updated and approved by the SRTC Board in November 2022 and is expected to be updated again in 2026. Any revisions identified in the outreach and needs assessment that impact the strategies used to guide Section 5310 funding criteria will be updated in future Call for Projects application and scoring materials. (For details on the specific regional strategies, the *Spokane County Public Transit-Human Services Transportation Plan* can be found at: <https://www.srtc.org/human-services-transportation-plan/>)

Section 2 - Roles and Responsibilities

STA is the regional public transportation agency for the Greater Spokane Area and serves the jurisdictions of Airway Heights, Cheney, Liberty Lake, Medical Lake, Millwood, Spokane, Spokane Valley, and unincorporated areas within Spokane County, which are within the Spokane County Public Transportation Benefit Area (PTBA). The cities of Cheney and Medical Lake, along with some unincorporated portions of Spokane County included in the PTBA, are outside the Spokane urbanized area (UZA)— please refer to map located in **ATTACHMENT A**.

STA's Responsibilities as a Designated Recipient

In December 2012, the Spokane Transit Authority (STA) was appointed by the Governor of the State of Washington to be the designated recipient of Section 5310 funds for the Spokane UZA (**ATTACHMENT B**). As the designated recipient for FTA funds, STA is responsible for developing the Program of Projects (POP) for apportioned FTA funds in the Spokane UZA, in a manner that is consistent with the requirements of the United States Code of Federal Regulations.

At STA's discretion, the agency may choose to conduct a public Call for Projects for federal funds apportioned to the Spokane UZA. The agency is responsible for submitting a Program of Projects (POP) to SRTC for inclusion in the Transportation Improvement Program (TIP). STA will utilize a Public Participation Process that complies with 49 USC 5307(b) when developing the POP.

STA's Responsibilities for 5310 Program Management

As a Section 5310 designated recipient, Spokane Transit Authority (STA) will:

- Develop a Program Management Plan (this document) to define local policies and procedures for the administration of the local Section 5310 Program.
- Develop project scoring and/or selection criteria.
- Notify eligible subrecipients of project funding availability.
- Solicit applications from potential subrecipients.
- Determine applicant and project eligibility.
- Certify fair and equitable allocation of funds to subrecipients.
- Develop and submit an annual Program of Projects to the FTA.
- Review federal compliance of subrecipients.
- Provide grant management and oversight.
- Ensure at least 55% of Sections 5310 funds allocated to STA are spent on traditional 5310 projects

- by eligible subrecipients, where applicable.
- Certify that all projects are derived from a locally developed coordinated public transit- human services transportation plan.
- Certify that, to the maximum extent possible, services under Section 5310 are coordinated with transportation services from other federal departments and agencies.
- Submit reports as required by the FTA.
- Oversee project audit and closeout.

Responsibilities of 5310 Subrecipients

Subrecipients who receive funds from any federal transportation grant program must follow the OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR Part 200).

Role of Spokane Regional Transportation Council

The Spokane Regional Transportation Council (SRTC) is the federal-recognized metropolitan planning organization (MPO) and the state Regional Transportation Planning Organization (RTPO) for Spokane County.

SRTC is tasked with managing and updating the *Spokane County Public Transit-Human Services Transportation Plan* (HSTP). SRTC may assist with the evaluation and scoring of Section 5310 project applications. SRTC is also responsible for preparing, adopting, and amending the TIP.

Regional Coordination

Spokane Transit Authority (STA) partners with Spokane Regional Transportation Council (SRTC) on regional planning efforts, including the development of the *Spokane County Coordinated Public Transit-Human Services Transportation Plan* (HSTP). STA does not intend to duplicate the planning and outreach processes of the HSTP; and will assist in implementation of HSTP goals and strategies which include management of the Section 5310 program.

Section 3 - Local Share and Funding Requirements

Spokane Transit Authority (STA) follows federal guidelines in determining the local matching share for Section 5310 projects. The maximum federal match for eligible capital costs is currently 80 percent of the total cost with a minimum local match requirement of 20 percent. Operating projects require a 50 percent minimum local match. Subrecipients must provide documentation detailing the source and the amount of the local match to STA. STA may contribute local match to reduce or remove the local match responsibility of the awarded agency. STA may also use up to 10 percent of the total annual appropriation for administrative costs with no local match requirement.

Exceptions

Local Share exceptions for projects that are subject to federal Americans with Disabilities Act of 1990 (ADA), or Clean Air Act (CAA) regulations are as follows:

1. Vehicle Acquisition: For purposes of complying with or maintaining compliance with ADA
2. (42 USC 12101 *et seq.*) or the CAA, the federal share is 85 percent. A revenue vehicle that complies with 49 CFR 38 may also be funded at 85 percent federal share.
3. Vehicle-Related Equipment and Facilities: For purposes of complying or maintaining compliance with the CAA (42 USC 7401 *et seq.*) and/or the ADA, the federal share is 90 percent (this includes clean fuel or alternative fuel vehicle-related equipment or facilities). FTA considers vehicle-related

equipment to be equipment on and attached to the vehicle (C9070.1G pg. III-17).

4. COVID-19 Match Requirements: For purposes of complying with COVID-19 provisions, the federal share for FY21, CRRSAA, and ARP funds is 100% federal with no local match requirement.
5. STA may choose to contribute local match to offset subrecipient local match requirements for both Traditional and Other projects.

Types of Local Match

The local share may include an undistributed cash surplus, a replacement or depreciation cash fund or reserve, a service agreement with a state agency, local agency, or private social service organization, or new capital. Some examples include state or local appropriations, dedicated tax revenues, private donations, and revenue from service contracts. Income from contracts to provide human service transportation may be used either to reduce the net project cost (treated as revenue) or to provide local match for Section 5310 operating assistance.

Non-cash share, such as donations, volunteered services, or in-kind contributions, are eligible to be counted toward the local match if:

1. The value of each non-cash share is documented and supported.
2. The non-cash share represents a cost which would otherwise be eligible under the program; and
3. The non-cash share is included in the net project costs in the project budget.

In-kind match is only available for projects that do not purchase capital items. For example, in-kind match is not eligible to meet the 20% local match requirement for a vehicle purchase. Federal funds may not be used for the local match. Subrecipients are encouraged to consult with STA on match requirements during the application process.

Project Geographic Area

Eligible subrecipient transportation services projects must start or end services within the STA Public Transportation Benefit Area (PTBA) and the Spokane Urbanized Area (UZA). Populations outside the UZA may be considered for funding, wholly or in part, provided that the project can demonstrate that most beneficiaries reside and/or the majority of trips are operated within the Spokane UZA.

Section 4 - Eligible Subrecipients and Activities

The following entities are eligible to receive funds for “Traditional” Section 5310 projects:

- Private nonprofit organizations (with a tax-exempt status from the Internal Revenue Service) that are currently registered with the State of Washington.
- A local government agency, district, or jurisdiction.
- STA as described in Section 5- Annual Funding Distribution (below).

The following entities are eligible to receive funding for “Other” Section 5310 projects:

- Local government agencies, districts, or jurisdictions.
- Private nonprofit organizations.
- An operator of public transportation that receives a Section 5310 grant indirectly through a recipient.

Private transportation operators, such as taxi companies, are eligible recipients for Section 5310 funds if they provide “shared-ride transportation services” as opposed to exclusive-ride services. *“Shared ride” is defined as two or more passengers in the same vehicle who are otherwise not travelling together.* The

general nature of the project must be shared-ride services to be considered eligible.

Taxi companies that provide exclusive-ride service are not eligible subrecipients by themselves. However, they may participate in the Section 5310 program as contractors. Exclusive-ride transportation providers may receive Section 5310 funds to purchase accessible vehicles under contract with the state, designated recipient, or an eligible subrecipient (C9070.1G Pg. III-5).

Eligible Activities

Certain capital and operating projects are eligible to receive funding through the Section 5310 program within two funding categories: “Traditional” 5310 projects and “Other” 5310 projects. A minimum of 55% of the total 5310 Spokane Transit Authority (STA) appropriation must be reserved for “Traditional” 5310 projects with a maximum of 45% of total allocated 5310 funds allocated to “Other” 5310 projects.

Projects must clearly indicate whether they are applying as a “Traditional” 5310 project or “Other” 5310 project (even though projects may be eligible under both funding categories). STA will ensure that 55% of the total allocated funds are spent on “Traditional” 5310 projects.

Traditional 5310 Projects

“Traditional” 5310 projects are defined as public transportation capital projects that are designed to meet the special needs of seniors and individuals with disabilities. Eligible projects must meet the definition of a capital project, as defined in 49 USC 5302 (link: <http://www.gpo.gov/fdsys/pkg/USCODE-2013-title49/pdf/USCODE-2013-title49-subtitleIII-chap53-sec5302.pdf>), and be carried out by eligible subrecipients. In addition, subrecipients must be able to prove that the project will primarily benefit seniors and persons with disabilities.

Traditional 5310 Projects include, but are not limited to:

- Vehicle purchases and preventive maintenance on purchased vehicles, including equipment/parts needed to support the vehicle.
- Passenger amenity purchases include the installation of benches, shelters, and other passenger amenities.
- Support facilities and equipment such as extended warranties, dispatch systems and other computer hardware and software.
- Acquisition of transportation services under contract by an eligible subrecipient including transportation projects that provide demand response service to seniors and people with disabilities.
- Mobility management and coordination programs.
- Additional traditional projects are as authorized by FTA Circular 9070.1G.; and
- Other capital expenses as defined in 49 USC 5302.

Other 5310 Projects

“Other” 5310 projects are defined as capital or operating projects that exceed ADA requirements, decrease individuals’ dependence on complementary paratransit services, or provide alternatives to public transportation to seniors and people with disabilities. A maximum of 45% of STA’s 5310 annual appropriation can be allocated to “Other” projects. These projects must be targeted toward meeting the transportation needs of seniors and individuals with disabilities, although they may be used by the general public. Subrecipients must prove that the project will primarily benefit seniors and persons with disabilities in their application(s).

“Other” 5310 Projects include:

- Accessibility improvements to transit and intermodal stations include building an accessible path,

ramps, improving wayfinding measures and other technology improvements to enhance accessibility.

- Support for driver programs that transport seniors and people with disabilities.
- Travel training programs that educate riders on the fixed route system.
- Alternatives to public transportation (accessible taxi, ridesharing, and/or vanpooling programs, administration and expenses related to voucher programs, and support for volunteer driver and aide programs).
- Additional projects as authorized by FTA Circular 9070.1G.

Section 5 - Annual Funding Distribution

Program of Projects

STA will determine whether to issue a public call for 5310 projects (RFP) based on current funding priorities. When projects are selected for Section 5310 funding, they will be included in the annual Program of Projects (POP) report – which also includes current, active projects. The POP Status Report is submitted to the Federal Transit Administration (FTA).

STA develops an annual Transit Development Plan (TDP) that contains the Annual Report, Service Improvement Program and Capital Improvement Program. The TDP Capital Improvement Program includes a description of the selected Section 5310 projects in each funding category (“Traditional” or “Other”). The TDP is submitted to the Washington State Department of Transportation (WSDOT) and the Spokane Regional Transportation Council (SRTC) annually.

Spokane Transit coordinates with Spokane Regional Transportation Council (SRTC) to place federally funded projects in the State Transportation Improvement Plan (STIP). Outreach efforts for STIP adoption include a public hearing and notification to public agencies and interested parties. The STIP public outreach process serves as one component of the POP public notification process.

The following chart illustrates the Call for Section 5310 Project Application process. *(This is subject to change based on when funds become available and staffing resources).*

Typical Call for Section 5310 Projects Application Timeline	
Month(s)	Action
Jan-Mar	Federal Register with Annual 5310 Allocations announced
Jul	STA issues Call for Section 5310 Project Preliminary Proposals
Jul	Section 5310 Informational Meeting for Eligible Applicants
Aug	Call for Projects Final Project Applications Due
Sep-Oct	Evaluate and Score Project Applications
Oct	Present Recommended List of Projects to Receive 5310 Funding to STA Board of Directors and Committees
Oct	STA Board makes final decision on awarding funds

Nov	Begin process of awarding funds to subrecipients
Dec	Publish 5310 Program of Projects and submit to FTA

Spokane Transit Authority (STA) provides a competitive selection process to distribute Section 5310 funds fairly and equitably within the Spokane UZA. Projects are selected based upon the ability to meet the regional transportation needs listed within the Coordinated Public Transit- Human Services Transportation Plan (HSTP) (link: https://www.srtc.org/wp-content/uploads/2018/11/Final-2018-CPT-HSTP_Board-Approved_110818.pdf).

Call for Projects

If STA decides to issue a public call for projects, STA will verify the Section 5310 apportionment in the Federal register. The Call for Projects will include a public notification of the availability of funds. A description of how and when projects will be selected, including scoring criteria, will be included in the application and notification materials as follows:

1. STA will draft a public notice of funding opportunity for eligible applicants to be posted on STA's Section 5310 webpage at <https://www.spokanetransit.com/about-sta/section-5310-program>, in the local newspaper, and on Spokane Regional Transportation Council's website, along with the grant application.
2. Letters or emails of the public notice and the grant application will be sent to interested parties and potential applicants.
3. The public notice will be posted at least 30 days before the application deadline. In the case of a revised call for projects, the timeline may be expedited.
4. Prior to the application deadline, STA will host an informational meeting for potential applicants to answer questions about the program. Application materials will also be posted on STA's website.

STA will provide technical assistance to applicants, as needed.

Private Sector Participation

An updated list of nonprofits and private providers of transportation that qualify as eligible Section 5310 subrecipients will be maintained by the Spokane Transit Authority (STA). STA will send a Notice of Section 5310 Funds Availability to all parties on this list. These organizations will have the opportunity to apply for project funding during the Call for Projects process. To encourage maximum private sector participation, STA will also hold an informational meeting during the Call for Projects process, to provide interested parties the opportunity to inquire about the Section 5310 program.

Application Process

Applications submitted after the call for projects deadline will not be considered.

Preliminary Proposal Eligibility Review and Risk Assessment

Preliminary proposals submitted on or before the deadline will be reviewed for initial eligibility. The applicant must submit basic project information, including project description, applicant information, relationship of the project to stated goals, anticipate project costs and funding request amount, the anticipated timeline and other information as outlined as the Preliminary Proposal form. This information will be used in an initial eligibility review and risk assessment as outlined below, and to aid STA in supporting applicants through the funding process.

Eligibility Review

The eligibility review is reflected in the following criteria:

- Applicant is an eligible subrecipient for Section 5310 funds (as defined in Section 6).
- The project fits one or more goals/strategies of the Spokane County Coordinated Public Transit-Human Services Transportation Plan (HSTP).
- The proposed population served is consistent with the scope of the grant program

Risk Assessment

Spokane Transit will assess the level of risk for each subrecipient to identify if additional monitoring (or contract) requirements need to be imposed on the subrecipient to ensure compliance. The risk assessment will consider factors as prescribed by OMB Guidance § 200.331

Projects providing new services and new applicants may be asked to provide additional information to demonstrate capacity and capability to deliver on the project, this may include a logic model, business plan, needs assessment, or equivalent documentation. Subject to its review, STA may notify an applicant that they are required to provide this additional documentation along with the final application in order to maintain eligibility.

Final Project Applications – Intake Review

After an application is deemed eligible in the preliminary proposal eligibility review an application will be reviewed for completeness and eligibility before the application can advance to scoring.

The required documentation for subrecipients to provide as the final project application includes,

- Preliminary proposal- agency contact information, project type, project costs, and project information. This information is to be provided in advance of the final application deadline.
- Final Project application- project costs, project information and levels of service, and agency experience.
- Capacity and capability information as may be required by STA following the Preliminary Proposal Risk Assessment
- Signed by an authorized individual from the agency (e.g., CEO or Board Member).
- Non-profit status documentation (articles of incorporation and IRS tax I.D. letter).
- Letter certifying the source and amount of local share (matching) funds, when applicable.
- Independent audit report (or equivalent) with copies of any management letter(s).
 - Single audit report for applicants with \$750,000 or more in federal funds per year.
- Signed certifications, including:
 - Lobbying certification.
 - Suspension & Disbarment certification.
 - DBE certification, if applicable.
 - Buy America certification, if applicable.
- Current Title VI Plan or plan from agency to develop and submit a Title VI Plan, that meets federal requirements as determined by STA, within 90 days of the executed agreement.
- Budget Narrative Worksheet
- Risk Assessment Questionnaire and policies, where applicable:
 - Accounting Policy/Cash Management (2 CFR 200.302)
 - Internal Controls (2 CFR 200.303)
 - Travel Policy (2 CFR 200.474)
 - Procurement Policy (2 CFR 200.318)
 - Compensation (2 CFR 200.430)
 - Conflict of Interest Policy (2 CFR 200.112)

- Equipment and Inventory Records (2 CFR 200.313)
- Current cost allocation plan, if applicable (for operating funds), approved by the applicant's cognizant agency within the last year.
 - Applicants who do not have a current federally approved indirect cost, may choose to use the 10% de minimis rate.

Applicants are encouraged to identify scaled funding options in case insufficient funding is available to fund a project at the full requested amount. If an applicant indicates that a project is scalable, the applicant must provide an appropriate minimum funding amount that will fund an eligible project that achieves the objectives of the program and meets all relevant program requirements. The applicant must provide a clear explanation of how the project budget would be affected by a reduced award. STA may award a lesser amount regardless of whether a scalable option is provided.

Application Scoring

Project applications that meet the minimum criteria listed above will be evaluated by a committee comprised of representatives of STA, SRTC, and other pre-selected entity(ies) that do not have a conflict of interest. This committee will score the projects based on criteria listed below.

- Risk Assessment- 10 Points
 - Agencies will complete an organizational risk assessment which will be used by the evaluation committee to help assess the organization's capacity to manage federal funds
- Application Completeness- 10 points
 - To what extent are agency responses included for each application questions? Are any items missing or needing more relevant information? (3 points)
 - What required attachments did the agency submit for review/approval? Were any items missing or lacking information? (2 points)
 - What population(s) will the project serve? (5 points)
- Proposed Service Improvements- 25 points
 - Does the proposed project provide a service that directly benefits seniors and/or persons with disabilities? (5 points)
 - What barriers will this project seek to overcome in providing transportation options to seniors and individuals with disabilities? (10 points)
 - Based on the methodology and/or information provided, will the project provide a significant benefit to seniors and individuals with disabilities? (10 points)
- Regional Transportation Needs- 10 points
 - What specific needs/strategies from the Spokane County Coordinated Public Transit-Human Services Transportation Plan (HSTP) will this project meet? (10 points)
- Performance Measures- 20 points
 - Does the proposed project increase or enhance the availability of transportation services for seniors and/or individuals with disabilities? (10 points)
 - What methodology will be used to gather data regarding one-way trips provided quarterly for seniors and individuals with disabilities? (10 points)
- Management- 10 points
 - What qualifications/experience does the management team describe? (5 points)
 - If submitting a capital project, how will the agency continue or sustain this project after expiration? (5 points)
- Financials- 15 points
 - What other funding sources have been committed to this project? (5 points)
 - Is this project contingent upon other funding commitments? Indicate, if applicable, any

interrelated projects that are seeking funding, either through the current call for projects or other funding sources, that are necessary to implement the requested project? (5 points)

- Is the project feasible to implement with less funds than requested? If so, what changes would be made to address a lower award amount than requested? (2 points)
- Are line items in the budget table clearly described in the budget narrative, including the basis for each cost (cost estimates, quotes, actual data, etc.)? (3 points)

Awarding Funds

Once scoring is completed, STA planning staff will prepare a summary sheet for the STA Planning and Development (P&D) Committee to review. The P&D Committee will submit a recommendation to the full STA Board of Directors for approval. The STA Board of Directors will review and approve the award of projects to Section 5310 subrecipients. STA reserves the discretion to award less funding than requested based on scoring results and funding recommendations.

The approval process will include a public meeting/hearing which will give interested parties the opportunity to comment. The contracting process may take up to a month or more, depending on the availability of STA staff.

FTA Concurrence

Remaining Traditional requirement funds will be used by STA for Human Services Transportation project which will be part of a separate request for proposals. If after this request for proposals, there are still no eligible projects to receive the Traditional portion of funding, STA may certify that there are insufficient funding requests to meet the 55% minimum threshold for “Traditional” 5310 projects, provide proof that non-profits agree with this, and then STA may choose to allocate funding to paratransit van purchases and/or other projects to satisfy this requirement.

If the Spokane Transit Authority (STA) does not receive sufficient applications for “Traditional” 5310 funding, STA will submit a certification letter to FTA stating there are not enough eligible “Traditional” funding subrecipients. STA may then award funding to Spokane Transit “Traditional” capital projects. STA may also submit eligible projects under the “Other” funding category if applicable.

After the Call for Projects and project screening process has been completed, any remaining funds may be used by non-profits, local governments, and other public transportation providers for other 5310 capital or operating projects. These projects may include public transportation projects that exceed the requirements of Americans with Disabilities Act (ADA) Paratransit services but must be consistent with the needs and strategies outlined in the regional public transit-human services transportation plan (HSTP).

Section 6 - Agreement Development

Agreements

Once the STA Board approves and awards subrecipients with 5310 funds, subrecipients will receive an award letter. STA Planning staff will use the Budget Narrative Worksheet submitted with the application to draft a Budget Narrative and Scope of Work (SOW) for the subrecipient to review and approve. With FTA’s approval of the Section 5310 application, STA Planning staff will then begin working with the STA Contracts Compliance Specialist to draft an operating and/or capital agreement which will include the SOW. The subrecipient will approve and sign the agreement, which will then be presented to STA’s CEO for signature. The subrecipient will receive an executed copy of their agreement and STA will retain the original.

Pre-award Authority

Pre-award authority is given to subrecipients under specific and limited circumstances to incur costs for eligible projects before a grant is awarded by FTA. Below are requirements that apply to pre-award authority (C9070.1G Pg. VIII-11).

1. Applicants must comply with all federal requirements, failure to do so will render a project ineligible for FTA financial assistance.
1. Reimbursement of pre-award costs is not guaranteed, and to be eligible for subsequent reimbursement, the project must have met all FTA statutory, procedural, and contractual requirements.
2. Pre-award funds are subject to the availability of funds and grant award.
3. Pre-award authority is triggered for certain projects when the award is approved by the Board and the following conditions are met:
 - a. STA has given approval for the subrecipient to use pre-award authority. Approval can be given through email to the subrecipient.
 - b. 5310 projects must be in the current annual STIP
 - c. 5310 apportionment must be published in Federal Register
 - d. The project must be categorically exempt as defined by FTA (mobility management and operating)
 - e. The subrecipient must be considered active under SAM and in goodstanding (not disbarred from federal grants)
 - f. Construction projects must have FTA environmental concurrence
4. FTA apportionment and Federal Register triggers pre-award authority for design and environmental work on the project

Following approval of project awards by the STA Board of Directors, STA will provide written confirmation and indicate the date in which pre-award authority will apply, which will be no earlier than the first day of the month following STA Board approval. Subrecipients incur expenses under pre-award authority at their own risk. Although funds have been obligated to the project, there are certain federal and state requirements that are required to submit requests for reimbursement. Subrecipients will be responsible for any expenses incurred under pre-award authority that are not in compliance with the executed agreement.

Federal Funding Accountability & Transparency Act (FSRS)

FTA requires that recipients submit a report about each award over \$25,000 by the end of the month following the date of an executed agreement. Once STA submits an initial report, revisions can be made to add additional subawards or to change data previously submitted to reflect adjustments in subawards.

If STA allows a subrecipient to use pre-award authority, the deadline would be based on the date of the FTA obligation, since FSRS cannot accept subaward reports before the federal obligation is recorded in the system. The required data elements in FSRS are:

- Name of entity receiving subaward Doing Business As (DBA) Name
- DUNS of the entity and its parent and DUNS+4 (is used to identify specific units within a larger entity)
- Amount of subaward
- Funding Agency
- Program Source
- Subaward number (Note: assigned by recipient)

- CFDA number (Note: The same CFDA associated with the FTA award)
- Place of performance (including congressional district)
- Total compensation and names of top five executives, if required (Note: Not typically required, with thresholds of \$25 million and 80 percent of total revenue coming from federal funds)
- Award title descriptive of the purpose of the funding action
- Location of the entity (including congressional district)
- Unique identifier of the entity and its parent

The amount that is to be reported for each subrecipient is the amount of the total subaward, not payments to date. Payment/drawdown information is not included in the data fields requested. (C9070.1G pg. VI-14)

Section 7 - Program Management

Spokane Transit Authority will develop and execute grant agreements with each subrecipient selected to receive funding from the Section 5310 program. The amount, type (capital, operating, or planning), and the period of performance (term) will be included. Any expenses incurred in excess of the budgeted amounts are the sole responsibility of the subrecipient and are not eligible for reimbursement.

Spokane Transit Authority will be responsible for processing all reports, plans, and certifications required by the Federal Transit Administration (FTA). The Assistant Transit Planner will oversee all aspects of grant management and subrecipient compliance with federal requirements through regular review of invoices, reports, correspondence, and periodic site visits according to the Subrecipient Monitoring and Oversight Procedures (**ATTACHMENT C**) and Section 5310 Subrecipient Billing Standard Operating Procedures (**ATTACHMENT D**).

Procurement

Each recipient, including subrecipients, of FTA seeking Federal assistance to acquire property or services in support of its proposed project is required to certify (in accordance with 49 CFR part 18.36) that its procurement procedures will comply with all applicable Federal laws, regulations, and directives - except to the extent FTA has expressly approved otherwise, in writing. STA will directly facilitate all procurements for Section 5310 vehicles according to the Section 5310 Vehicle Procurement and Transfer for Qualified Subrecipients (**ATTACHMENT E**). A certification of compliance will be incorporated into the 5310 application and subrecipient agreement with the Spokane Transit Authority.

Financial Management

Spokane Transit Authority complies with all applicable standards set forth in 2 CFR 200 and guidance in the FTA "Grant Management Guidelines" FTA C 5010.1 (Circular 5010-1E – as revised on March 21, 2017) with regard to accounting records, internal controls, budget control, financial management systems, cost standards, financial reporting requirements, and annual audits. Subrecipients must agree to establish and maintain an accounting system that accurately tracks itemized project costs by line item.

Property Management

Subrecipients are responsible for all normal maintenance and upkeep on any vehicles or equipment purchased with Section 5310 funds. Vehicle and equipment use, and maintenance requirements are specified in the subrecipient agreement.

STA will maintain an inventory of all Section 5310 property purchased and will request periodic reports from subrecipients to keep this inventory current. STA staff may also perform site visits to inspect vehicles and

equipment.

Vehicle Use

FTA encourages maximum use of vehicles funded under the Section 5310 programs. Vehicles are to be used first for program-related needs for which the grant is developed, and then to meet other transportation needs of other federal programs or project needs, if they do not interfere with the project activities originally funded. If any vehicles are to be removed from service prior to the end of its useful life, the subrecipient must notify Spokane Transit prior to doing so.

Useful Life

STA adheres to the vehicle useful life criteria that are detailed in the current FTA Circular 5010.1E, Grant Management Requirements.

Buses

1. Large, heavy-duty transit buses including over-the-road buses (approximately 35' – 40' or larger including articulated buses):
At least 12 years of service or an accumulation of at least 500,000 miles.
2. Small size, heavy-duty transit buses:
At least 10 years or an accumulation of at least 350,000 miles.
3. Medium-size, medium-duty transit buses:
At least seven years or an accumulation of at least 200,000 miles.
4. Medium-size, light-duty transit buses:
At least five years or an accumulation of at least 150,000 miles.

Light Duty Vehicles (Vans)

Other light-duty vehicles used as equipment and to transport passengers (revenue service), such as regular and specialized vans, sedans, and light-duty buses including all bus models exempt from testing in the current 49 CFR part 665 have a useful service life of at least four years or an accumulation of at least 100,000 miles, whichever comes first. (C5010.1E Pg. IV- 25)

Vehicle Title

STA will have continuing control over the vehicles and accepts the responsibility of ensuring that the subrecipient will continue to use the vehicle for a public transit benefit. Public benefit is defined under the Section 5310 Program as “transporting seniors and individuals with disabilities.” During the useful life of the vehicle, STA will be listed as the legal owner on the vehicle’s title and the subrecipient will be the registered owner. Once the useful service life requirement has been satisfied according to the Section 5310 Vehicle Procurement and Transfer for Qualified Subrecipients (**ATTACHMENT E**), STA will transfer title of the vehicle to the subrecipient.

Maintenance and Disposition

Vehicles and equipment must be maintained in good operating order and subrecipients must follow the manufacturer’s suggested maintenance schedules. Spokane Transit Authority and its subrecipients will follow all required vehicle and equipment management and disposition procedures and guidance under the common rule found in 49 CFR 18.32 and applicable guidance in the current FTA Circular 9030.1E.

The subrecipient maintains responsibility for the repairs and maintenance of the vehicles and any extended or additional warranties must be reported to STA. This includes warranty claims, warranty repairs, proof of claim submittal(s) to manufacturers, and any steps taken to follow up on unpaid claims. STA currently provides oversight for subrecipient vehicles purchased with Section 5310 federal funding by

conducting annual vehicle inspections and desk reviews, and quarterly progress reports. This monitoring tracks vehicle condition, maintenance, useful service life, miles, hours, and unduplicated trips provided.

National Transit Database (NTD) Reporting

In general, Spokane Transit is not required to report on 5310 subrecipients in the National Transit Database (NTD). Only agencies that provide public transportation are required to report to the NTD. Client and center-based transit services are not considered public transit services.

Accounting Systems

The subrecipient must agree to establish an accounting system that will include a separate account for the 5310 funded project(s). The subrecipient also agrees to maintain all checks, payrolls, invoices, contracts, vouchers, orders, or other accounting documents related to, in whole or in part, the project so that they may be clearly identified, readily accessible, and available to Spokane Transit or FTA upon request.

The subrecipient must agree to retain all data, documents, reports, records, contracts, and supporting materials relating to the project throughout the course of the grant and for a period of three years after the date of the final expenditure report submission to FTA. This information may be accessed by the designated recipient, U.S. Secretary of Transportation, the Comptroller General of the United States, and, to the extent appropriate, the State, or its authorized representatives.

Audit

Spokane Transit Authority ensures that audits will be performed pursuant to the requirements of Super Circular 2 CFR Part 200 Section F (or Circular A-133 for fiscal years ending in FY2015) and to resolve audit findings and bring problems to FTA's attention. Subrecipients receiving \$750,000 or more in all federal sources in a single fiscal year will be required to obtain a Federal single audit and provide a copy to Spokane Transit Authority for review.

Administrative Costs – STA & Subrecipients

Spokane Transit Authority

Allowable administrative costs may include general administrative costs directly attributed to the 5310 project(s), staff salaries, office supplies, and development of specifications for vehicles and equipment. Spokane Transit Authority (STA) administrative activities may include technical assistance and other planning activities.

Examples of eligible administrative expenses include:

- Assisting with the update of the *Spokane County Coordinated Public Transit-Human Services Transportation Plan – (HSTP)*, as needed.
- Conducting the competitive selection process for Section 5310 applications.
- Providing technical assistance to applicants and subrecipients.
- Grant management, ongoing administration, and monitoring of subrecipients, including non-profits and other government entities.

Subrecipient Administrative Costs

Subrecipients may include certain pre-approved administrative costs in their Section 5310 funding application(s). This may include administrative expenses that are directly attributed to project delivery such as project delivery, oversight, and compliance activities. All administrative costs must be supported by documentation (e.g. timesheets, invoices, and/or direct allocation plans) to be considered for reimbursement.

Subrecipients must identify the type of indirect costs they will be using for the project. Subrecipients will

indicate whether they are using a federally approved indirect cost plan or a 10% de minimis rate allowed under 2 CFR Part 200. If subrecipients select to use the 10% de minimis rate option, they must indicate that they have never used a federally approved rate. STA will not accept indirect cost allocation plans that are not approved, in writing, by a federal agency. Grantees (STA) are responsible for negotiating these plans in advance of the executed agreement.

Spokane Transit Authority (STA) has decided not to include indirect expenses in its FTA application – therefore, subrecipient indirect costs will not be funded by STA; however, federally approved indirect cost rates and de minimis rates can be funded by FTA. Subrecipients are encouraged to contact STA planning staff during the application process for further clarification on allowable administrative expenses.

Agreement Amendments

Depending on the funding available and the effectiveness of the project to continue to serve seniors and individuals with disabilities, STA may extend the agreement beyond the approved term. The subrecipient must request an agreement extension which will be reviewed and approved by the Principal Transit Planner. Once approved, STA Planning Staff will work with the Contracts Compliance Specialist to draft an agreement amendment. The subrecipient will review the draft and with acceptance of the new agreement term, it may be executed. The subrecipient must continue to comply with all previous financial, performance, and reporting requirements.

Returned Funds

If 5310 funds are returned and/or if the agreement is terminated, STA will verify the total amount of funds to be returned internally with the Sr. Financial Services Manager and confirm this amount with the subrecipient. STA Planning Staff and Contracts Compliance Specialist will draft internal processing documents and an amendment for the agreement. This amendment shall be presented to the subrecipient for approval before a final draft is completed. The final documents shall be reviewed and approved by both the Principal Transit Planner and the Chief Planning and Development Officer. Once the amendment has been executed, the subrecipient will receive a copy for their records and STA will retain the original. STA will then notify FTA through a budget revision.

Subrecipient Project Closeout

Spokane Transit Authority (STA) will initiate project closeout with subrecipients within 90 days after all work activities are complete and all funds as expended. STA will then initiate the full POP closeout with FTA within 90 days after all work activities contained within are completed. A final Federal Financial Report, final budget, and POP will be submitted electronically via the electronic grant management system at the time of closeout. (C9070.1G Pg. VI-15)

Grant closeout procedures:

Any deviation from the approved Section 5310 award must be documented in the closeout. STA will initiate the closeout electronically, by submitting the following information in TrAMS, as part of the closeout process: (C5010.1E Pg. III-19). This will include:

- Project Closeout Checklist
- Confirmation that activities are complete and if closeout Amendment will de-obligate any unexpended balance of federal assistance.
- A list of property acquired or improved in support of the Award that will continue to be within the purview of the Grant or Cooperative Agreement.
- A final, reconciled Award Budget reflecting actual Project costs by scope code and activity, reflecting adjustments to the federal and non-federal amounts.
- A final FFR, consistent with the reconciled Award Budget (e.g., de-obligation).

- A final narrative MPR indicating the actual completion date of each ALI and a discussion of each ALI contained in the final Award Budget.
- Any other documentation or reports required as part of the terms and conditions of the Grant or Cooperative Agreement.

Section 8 - Program Measures

Project Reporting and Monitoring

Subrecipients will be required to submit to Spokane Transit Authority (STA), on a periodic basis, certain project data, budget, and statistical information, to be outlined in the agreement. This information will allow STA to properly monitor subrecipients for compliance with federal requirements. Subrecipients will be required to contact STA immediately if they experience any material project or budget changes from the originally outlined project application or sub-agreement. Any significant changes to project scope or budget require prior approval from STA.

STA Planning staff will develop a monitoring plan for all subrecipient projects annually. This monitoring plan will include methodology used to determine what type of monitoring the project will receive based on project type and a timeline for when monitoring be conducted. Section 5310 projects will be subject to monitoring by STA program staff periodically, based on risk assessment scores, compliance with federal regulations, and project closeout.

All monitoring checklists will be reviewed periodically and are subject to revisions and updates based on federal and STA requirements. STA Planning staff will evaluate the need for additional checklists as needed.

FTA Performance Measures

FTA requires Spokane Transit to submit Section 5310 performance measures, targeted to capture overarching program information, as part of its annual report submitted to FTA. The following indicators will be used to measure the projected and actual service impacts based on the project type:

For “Traditional” Section 5310 Projects:

1. “Gaps in Service Filled: Provision of transportation options that would not otherwise be available for seniors and individuals with disabilities, measured in numbers of seniors and individuals with disabilities afforded mobility they would not have without program support as a result of traditional Section 5310 projects implemented in the current reporting year.”
2. “Ridership: Actual or estimated number of rides (as measured by one-way trips) provided annually for seniors and individuals with disabilities on Section 5310-supported vehicles and services as a result of traditional Section 5310 projects implemented in the current reporting year.”
3. “Quarterly Progress Reports: Quarterly progress reports shall be submitted for the duration of the Agreement period and STA will provide subrecipients a template.”

For “Other” Section 5310 Projects:

1. “Service Improvements: Increases or enhancements related to geographic coverage, service quality, and/or service times that impact availability of transportation services for seniors and individuals with disabilities as a result of other Section 5310 projects implemented in the current reporting year.”
2. “Physical Improvements: Additions or changes to physical infrastructure (e.g., transportation facilities, sidewalks, etc.), technology, and vehicles that impact availability of transportation services for seniors and individuals with disabilities as a result of other Section 5310 projects

- implemented in the current reporting year.”
3. “Ridership: Actual or estimated number of rides (as measured by one-way trips) provided for seniors and individuals with disabilities as a result of other Section 5310 projects implemented in the current reporting year.”
 4. “Quarterly Progress Reports: Quarterly progress reports shall be submitted for the duration of the Agreement period and STA will provide subrecipients a template.”

Section 9 - Civil Rights and ADA Reporting

In order to receive federal funding, Spokane Transit Authority (STA) is required to implement a Title VI program which is to be updated no less than every three years per the guidance of FTA C 4702.1B. This program can be found on the STA website and is a required part of the training for all public facing employees. Subrecipients awarded 5310 funding must submit Title VI Programs to STA in order to assist in compliance efforts. STA program staff will use the Title VI Checklist to ensure that Title VI Plans meet all requirements.

Title VI Plan Requirements

- Subrecipients shall submit Title VI Programs to STA to assist with compliance efforts.
- Subrecipients may choose to adopt STA’s notice to beneficiaries, complaint procedures and complaint form, public participation plan, and language assistance plan where appropriate.
- Operational differences between STA and subrecipient may require, in some instances, that the subrecipient tailor its language assistance plan to meet the needs of the individuals being served.
- Subrecipients shall submit a copy of the board resolution, meeting minutes, or similar documentation as evidence that the Title VI Plan has been approved.
- Subrecipients shall develop and submit to the primary recipient a list of complaints, investigations, or lawsuits.
- Subrecipients that have transit-related, non-elected planning boards, advisory councils, or committees, the membership of which is selected by the subrecipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.
- Subrecipients must submit all the above information to STA on schedule and may be electronic at the option of the primary recipient.

Title VI Plan Contents

Every Title VI Plan shall include the following information (C4702.1B Pg. III-2):

1. A copy of the subrecipient’s public notice that indicates they comply with Title VI and informs members of the public of their protections against discrimination afforded to them by Title VI.
 - a. Include a list of locations where the notice is posted.
 - b. Include Safe Harbor languages.
2. A copy of the recipient’s instructions to the public regarding how to file a Title VI discrimination complaint, including a copy of the complaint form.
3. A list of any public transportation-related Title VI investigations, complaints, or lawsuits filed with the recipient since the time of the last submission.
 - a. This list should include only those investigations, complaints, or lawsuits that pertain to allegations of discrimination on the basis of race, color, and/or national origin in transit-related activities and programs and that pertain to the recipient submitting the report, not necessarily the larger agency or department of which the recipient is a part.
4. Most recent census data to identify demographics of service area.

- a. Include information on minority, language spoken at homes, and income.
5. A public participation plan that includes an outreach plan to engage minority and Limited English Proficient (LEP) populations, as well as a summary of outreach efforts to low-income, LEP, and minority populations made since the last Title VI Program submission. A subrecipient's targeted public participation plan for minority populations may be part of efforts that extend more broadly to include other constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.
6. A copy of the recipient's plan for providing language assistance to persons with limited English proficiency, based on the DOT LEP Guidance.
 - a. Include four factor analysis, how notice will be provided, how the plan will be monitored and updated, and how employees are trained to provide assistance.
7. Subrecipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees or councils.
 - a. Include a description of efforts to encourage the participation of minorities on these planning bodies.
8. If the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.
9. A copy of Board meeting minutes, resolution, or other appropriate documentation showing the Board of Directors or appropriate governing entity or officials responsible for policy decisions reviewed and approved the Title VI Program.
10. Additional information as specified in chapters IV, V, and VI, depending on whether the recipient is a fixed route transit provider, a State, or an MPO.

Spokane Transit staff will provide technical assistance to subrecipients to ensure compliance.

Subrecipients are provided with templates, checklists, and other resources needed to write, adopt and implement a Title VI Program. As part of developing the 5310 agreements, STA will meet with each subrecipient to ensure subrecipients are familiar with their responsibilities under the agreement. STA will aid subrecipients with these requirements in the following ways:

- **Clauses:** STA will include federal civil rights program clauses in all applicable agreements.
- **DBE Program:** DBE clauses will be included in all subrecipient agreements (along with any third party contracts the subrecipient will enter into as part of the grant project). If a DBE is used for a subrecipient's project, STA will include DBE information in STA's report submission to the FTA. If the subrecipient awards a contract that has a DBE participant, STA will review the subrecipient's certified payrolls, affidavit of wages paid and also prompt pay for DBEs.
- **EEO Program:** STA will require that any subrecipients that receive capital or operating assistance in excess of \$1 million or planning assistance in the excess of \$250,000 and employ 50 or more transit-related employees must submit to STA an EEO plan, with program updates required every three years. On a monthly basis, subrecipients (who meet the criteria) will be required to report to STA any EEO complaints received. STA will work with subrecipients to investigate and address complaints as appropriate.
- **Title VI Program:** Title VI Program clauses will be included in all subrecipient agreements and required for all third party contracts the subrecipient enters into as part of the grant project. All applicable subrecipients will submit a copy of their Title VI program for STA during the initial application review. The program should be compliant with all FTA general requirements. In addition, STA will also require each subrecipient to cooperate with STA in investigations, complaints, and lawsuits.

STA agrees to comply, and assures the compliance of each third-party contactor and each subrecipient with all of the following requirements under Title VI of the Civil Rights Act of 1964:

- Title VI of the Civil Rights Act of 1964 as amended (42 U.S.C. 2000d et seq.)
- U.S. DOT regulations, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of the Title VI of the Civil Rights Act,” 49 CFR part 21
- FTA Circular 4702.1B “Title VI Requirements and Guidelines for Federal Transit Administration Recipients.”
- U.S. DOT Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons (70 FR 74087, December 14, 2005)
- FTA Circular 4703.1 “Environmental Justice Policy Guidance for Federal Transit Administration Recipients.”
- U.S. DOT Order to Address Environmental Justice in Minority Populations and Low- Income Populations

As part of developing a Section 5310 agreement, STA will meet with each subrecipient to review and discuss applicable Section 504 and ADA requirements.

Section 10 - Other Provisions

Grant Recipients will ensure compliance with all applicable federal regulations throughout the length of the project to include the following:

Transfer of Funds

Safeguards will be followed to ensure that any transferred funds are used solely for Section 5310 projects. Funds transferred to other FTA programs are not permitted. Funds apportioned to large UZAs may not be transferred to other areas within the program, such as small UZAs or rural areas, but the State may transfer funds from small UZAs and rural areas to large UZAs if the State has established a statewide program for meeting the objectives of the Section 5310 program. STA may only transfer apportioned funds after consulting with responsible local officials, publicly owned operators of public transportation, and nonprofit providers in the area from which the funds to be transferred were originally apportioned.

Environmental Protection

The Federal Transit Administration (FTA) has stated that most projects and activities funded through the Section 5310 program do not normally involve significant environmental impacts and are termed “categorical exclusions (CEs).” Projects that have been categorically excluded are exempt from the requirement to prepare an environmental assessment. Spokane Transit Authority (STA) will certify to FTA in the annual Certifications and Assurances that all projects in its application for Section 5310 funds are CEs under 23 CFR 771.117(c), unless otherwise noted.

For projects that will likely qualify as a CE under 23 CFR 771.117(d), including projects involving construction or expansion of facilities, STA and its subrecipients will provide documentation to FTA for approval that clearly demonstrates that the stated conditions or criteria are met and that no significant adverse effects will result from the project. For any projects awarded Section 5310 funding found not to be a CE, STA and its subrecipients will consult with FTA to complete all necessary documentation and reviews to conform to applicable environmental protections as required.

Buy America

49 U.S.C. 5323(j) provides that, with exceptions, federal funds may not be obligated for public transportation projects unless steel, iron, and manufactured products used in such projects are produced

in the United States. Buy America requirements apply to all purchases, including materials or supplies funded as operating costs, if the purchase exceeds the threshold for small purchases (currently \$150,000). Spokane Transit Authority will conform to FTA regulations, 49 CFR part 661, and any amendments thereto.

Pre-award and Post-delivery Reviews

The Federal Transit Administration (FTA) requires grant recipients purchasing a certain number of revenue passenger rolling stock to undertake reviews of the rolling stock before the award of the contract and following delivery of the vehicles. The intention is to improve compliance with Buy America requirements, the grantee's bid specifications, and Federal Motor Vehicle Safety Standards. The requirement to undertake the pre-award and post-delivery reviews arises from 49 U.S.C. 5323(m) and is specified in FTA regulations at 49 CFR part 663. Compliance will be certified on STA's Annual List of Certifications and Assurances.

Restrictions on Lobbying

As a recipient of more than \$100,000 in FTA assistance, Spokane Transit Authority certifies that it will not use federal assistance to influence any member of congress or an officer or employee of any agency in connection with the making of any federal contract, grant, or cooperative agreement.

Prohibition on Exclusive School Transportation

FTA funds are prohibited from being used for exclusive school bus transportation for school students and school personnel. Spokane Transit Authority, as well as subrecipients, will be required to comply with 49 U.S.C. 5323(f), and FTA regulation, "School Bus Operations (49 CFR part 605). Federal Transit Administration recipients may operate multi-functional vehicles which meet the safety requirements for school transportation but may not provide exclusive school service.

Drug and Alcohol Testing

Recipients or subrecipients that receive only Section 5310 assistance are not subject to FTA's Drug and Alcohol testing regulations but must comply with the Federal Motor Carrier Safety Administration (FMCSA) regulations for employees who hold Commercial Driver's Licenses (CDLs) (49 CFR part 382). Spokane Transit Authority maintains an alcohol and drug-free workplace and has an anti-drug policy in accordance with the Drug-Free Workplace Act of 1988.

Attachments

The following list of attachments are incorporated by reference in the Spokane Transit Authority Section 5310 Program Management Plan. Please note that these documents include samples and are subject to revision.

ATTACHMENT A: Spokane Urbanized Area (UZA) Map

ATTACHMENT B: Section 5310 Designated Recipient Authorization

ATTACHMENT C: Subrecipient Monitoring and Oversight Procedures

ATTACHMENT D: Section 5310 Subrecipient Billing Standard Operating Procedures

ATTACHMENT E: Section 5310 Vehicle Procurement and Transfer for Qualified Subrecipients

This PMP references a variety of forms and documents that support the PMP but are not included in this document. The latest versions of the forms and documents can be found on STA's Section 5310 page:

<https://www.spokanetransit.com/section-5310-program>

UA NAME: Spokane, WA
 UA CODE: 83764
 ENTITY TYPE: Unincorporated Area (UA)
 S: Washington (3)

PARENT SHEET 1
Total Sheets: 1
- Index Sheets: 0
- Parent Sheets: 1

CHRISTINE O. GREGOIRE
Governor



NC
JW

STATE OF WASHINGTON
OFFICE OF THE GOVERNOR

P.O. Box 40002 • Olympia, Washington 98504-0002 • (360) 753-6780 • www.governor.wa.gov

December 20, 2012

Mr. Richard Krochalis
Regional Administrator
Federal Transit Administration
Jackson Federal Building
915 Second Avenue, Suite 342
Seattle, WA 98174-1002

Dear Mr. Krochalis:

In accordance with the Federal Transit Act [49 USC Section 5302(4)], this letter identifies the Spokane Transit Authority as the designated recipient of FTA Section 5310 funds, for the Spokane urbanized area. This designation follows the concurrence of the Spokane Regional Transportation Council as the federally designated Metropolitan Planning Organization for Spokane County.

Sincerely,

A handwritten signature in cursive script that reads "Christine O. Gregoire".

Christine O. Gregoire
Governor

cc: E. Susan Meyer, CEO, Spokane Transit Authority
Kevin Wallace, Executive Director, Spokane Regional Transportation Council
Paula Hammond, Secretary, Washington State Department of Transportation

DEC 26 2012 AM 11:30



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:

Revision #:	Initial
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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.

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Spokane Transit Authority

Section 5310 Subrecipient Billing

Standard Operating Procedures

Purpose

In accordance with 2 CFR Part §200.305, the purpose of these procedures is to ensure that only costs that are *reasonable, allowable, and allocable* to a Federal award shall be charged to that award directly or indirectly. Specifically, these procedures shall apply to the preparation and submission of billings submitted for reimbursement by Section 5310 subrecipients.

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 (Billing Procedures, Reasonableness Criteria, Allowable Use of Funds, Criteria for Allowability, Billing Documentation, etc.).

Prerequisites

- FTA C Circular 5010.1E – Award Management Requirements
- 2 CFR Part 200 – (Specifically, Subpart E – Cost Principles)
- Spokane Transit Section 5310 Program Management Plan, as amended

Responsibilities

- Assistant Transit Planner: will use this document as a guide to conduct daily activities to include reviewing billing invoices for eligibility, processing invoices, providing technical assistance to subrecipients, and other duties as assigned.
- Principal Transit Planner: will keep this SOP up-to-date and current for use, 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.
- Sr. Accounting/Finance Manager: will periodically review requests for payment to confirm that appropriate documentation has been provided prior to requesting reimbursement from the grant(s). This will include verifying the local share (match) contribution stipulated in the agreement(s) between Spokane Transit and its subrecipients.

Billing Procedures

The following policies shall apply to the preparation and submission of billings by Section 5310 subrecipients:

1. Reimbursements shall be requested after the expenditures have been incurred.

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2. To ensure timely spend down of grant funding, reimbursements shall be made on a monthly basis, *unless prior written approval is provided by the Spokane Transit Authority.*
3. Requests for reimbursement shall be submitted using the 'Section 5310 Project Billing Workbook' provided to the subrecipient by Spokane Transit Authority (see Billing Documentation Section below for details).
4. Requests for reimbursement will include actual amounts posted to the subrecipient's general ledger (as the primary source for all invoice amounts).
5. Requests for reimbursement shall clearly delineate the amount (and source) of all matching funds.

Reasonableness Criteria

It is the policy of the Spokane Transit Authority to only reimburse subrecipient expenses that have been determined to be reasonable per 2 CFR Part 200.404 as follows:

"...In determining reasonableness of a given cost, consideration will be given to:

- (a) Whether the cost is of a type generally recognized as ordinary and necessary for the operation of the non-Federal entity or the proper and efficient performance of the Federal award.
- (b) The restraints or requirements imposed by such factors as: sound business practices; arm's-length bargaining; Federal, state, local, tribal, and other laws, and regulations; and terms and conditions of the Federal award.
- (c) Market prices for comparable goods or services for the geographic area.
- (d) Whether the individuals concerned acted with prudence in the circumstances considering their responsibilities to the non-Federal entity, its employees, where applicable its students or membership, the public at large, and the Federal Government.
- (e) Whether the non-Federal entity significantly deviates from its established practices and policies regarding the incurrence of costs, which may unjustifiably increase the Federal award's cost..."

Subrecipients who have questions regarding reasonableness of project costs are encouraged to contact STA *prior* to incurring the cost. Costs that are considered unreasonable will not be reimbursed.

Allowable Use of Funds

Segregating Unallowable from Allowable Costs

The following steps shall be taken to identify and segregate costs that are allowable and unallowable for each Section 5310 subrecipient agreement.

Prior to the first disbursement, the Assistant Planner will:

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1. Review the executed agreement and the Section 5310 Project Billing Workbook (specifically, the Budget Narrative) for costs that are eligible for reimbursement.
2. Be familiar with the allowability of cost provisions of 2 CFR Part 200 Subpart E – Cost Principles, particularly:
 - a. The list of specifically unallowable costs such as alcoholic beverages, bad debts, contributions, fines, and penalties, lobbying, etc.
 - b. Any costs requiring advance approval from the FTA in order to be allowable in accordance with §200.407.

Prior to entering invoices into the STA accounting system (Tyler MUNIS), the Assistant Planner shall:

1. Verify that the expenses have been determined to be allowable under the terms of the executed agreement and/or 2 CFR Part 200 Subpart E – Cost Principles (see Criteria for Allowability below).
2. Verify that the reimbursement directly supports activities listed in the Scope of Work of the executed agreement and the progress report.
3. Verify that the invoices included in the reimbursement request are for specific line items included in the approved Section 5310 Invoice and Budget Reporting Workbook and Budget Narrative.
4. Verify that a general ledger account has been established in the subrecipient's chart of accounts to reflect the categories of allowable costs identified in the executed agreement.
5. Verify that any items of miscellaneous income or credits (including the subsequent write-offs of uncashed checks, rebates, refunds, and similar items) shall be reflected as reductions in allowable expenditures - if the credit relates to charges that were previously reimbursed.
6. Verify match contributions are correct and correspond with prior written confirmation (source and amount).
7. Determine if there are significant variances between actual and budgeted expenditures (greater or less than 10%). *These variances will be discussed with and resolved by the Principal Transit Planner prior to entering the invoice into MUNIS.*
8. Verify that the billing is reconciled and then entered in the Section 5310 Project Billing Ledger.
9. Prepare an Approval Routing Form for a Supervisor's signature. This form shall include:
 - a. FTA Award Number
 - b. STA Grant Agreement Number
 - c. Term of Agreement
 - d. Section 5310 Project Billing Workbook Budget Narrative Monthly Reimbursement page signed by the Agency Official
 - e. Section 5310 Project Billing Ledger
 - f. A description of the Indirect Cost Rate (if used) and STA approval date
 - g. Supporting Documentation (see below)
10. Combine the Approval Routing Form, Invoice & Budget Reporting Workbook, invoice, supporting documentation, and billing ledger.
11. Include verifications, received date stamp, certification stamp, and project string on the billing packet.
12. Route the billing packet via email for electronic signature by the Principal Transit Planner, or their absence, the Director of Planning and Development.

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Criteria for Allowability

It is the policy of STA to only reimburse expenses that have been determined to be allowable per executed agreements and 2 CFR Part 200 Subpart E – Cost Principles, General Provisions for Selected Items of Cost §200.420 - §200.476.

Billing Documentation

Requests for reimbursement shall be signed by an authorized official of the subrecipient organization using the Section 5310 Invoice and Budget Reporting Workbook provided to the subrecipient by Spokane Transit Authority. Subrecipients will be required to submit a written explanation to address any line items in the Invoice & Budget Reporting Workbook that are not within 10% of the month's variance. This explanation shall be submitted along with the reimbursement request for the month that the variance occurs. The applicable page (for the month) shall be submitted electronically to Section5310@spokanetransit.com and will include supporting documentation as follows:

Salaries and Benefits – Time sheets and personnel activity reports shall serve as the basis for charging salaries and benefits directly to the Section 5310 project award.

Subrecipients are required to submit copies of time sheets and accompanying personnel activity reports with billing requests which reflect all project/program(s) directly benefitting from their time and effort. These time sheets shall be signed by both the employee and the employee's supervisor.

Mileage – Copies of mileage sheets which detail the date, purpose, miles driven, and unique participant identifier shall be submitted with each request for reimbursement. Mileage will be reimbursed at the applicable Federal rate.

Equipment – Copies of invoices.

Equipment purchased for exclusive use on the federal award and reimbursed by STA shall be accounted for as a direct cost of that award (i.e., such equipment shall not be capitalized and depreciated).

Other Costs – Other project costs (e.g., office supplies, marketing expenses, rent, utilities, etc.) must be identified in the executed agreement and/or project budget. Copies of invoices.

Subrecipients will be required to submit a Monthly Beneficiary Data Report on the 20th day of each month. This report will be required to process the reimbursement requests.

(Local) Cost Sharing and Matching Funds Requirements

Any shared costs (matching funds), including cash and third-party in-kind contributions, will be accepted as part of the Section 5310 subrecipient's (local) cost share or matching requirement when such contributions meet all the following criteria:

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1. They are verifiable through written confirmation from the awarding entity.
2. They are necessary and reasonable for accomplishment of the STA Section 5310 project objectives.
3. They are allowable under 2 CFR Part 200, Subpart E – Cost Principles.
4. They are not paid by the Federal government under another Federal award, except where authorized by Federal statute to be used for cost sharing or matching.
5. They are accounted for in the Section 5310 project application (and/or budget) approved in advance by STA.
6. They conform to all other provisions of 2 CFR Part 200.

It is the policy of STA to value contributed services and property that are to be used to meet a (local) cost share or matching requirement at its fair market value at the time of contribution unless the executed agreement (or FTA regulations) identify specific values to be used. The value of donated space will not exceed the local fair market rental value of comparable space as established by an independent appraisal of comparable space and facilities.

Contributed volunteer services furnished by third parties used for (local) cost sharing or matching purposes shall be valued at rates consistent with rates paid for similar work in the Spokane area labor market. Reimbursement for contributed volunteer expenses (e.g., mileage) shall be documented in a manner acceptable to STA.

Subrecipient Invoice Processing & Notices

Requests for reimbursement will be directed to the Assistant Transit Planner for eligibility review and internal processing. Payment requests shall be submitted by the 20th of the month – unless prior written approval is provided by STA. Subrecipient billing requests shall be reviewed in a timely manner (within five (5) business days of receipt) and entered into STA's financial management system (MUNIS), *provided all required documentation has been submitted by the subrecipient.*

The Assistant Transit Planner will notify the subrecipient, in writing, of any discrepancies within five (5) business days of submittal by subrecipient. Invoices will be tracked (date of submittal, payment, notices, etc.) in the Section 5310 Invoice Tracking Sheet by Fiscal Year/Subrecipient/STA Grant Agreement.

Any questions or concerns regarding these procedures will be forwarded to the Principal Transit Planner for response.

Attachments (Incorporated by Reference):

Spokane Transit Approval Routing Form (Draft)
 Section 5310 Project Billing Ledger (Sample)
 Section 5310 Invoice Tracking Sheet (Sample)
 Section 5310 Invoice & Budget Reporting Workbook (Sample)

Spokane Transit Authority
Section 5310 Subrecipient Invoice
Approval Routing Form



Submitting Department: Planning and Development
Contact Person: Principal Transit Planner
STA Agreement #:
Project/Program Title:

Date:

CONTRACT INFORMATION:

	<i>(To be completed with 1st Disbursement)</i>	Staff Initials	Date
Contract Term:			
FTA Award # (FAIN):			
Project Type:			
Required Local Match %:			
Indirect Cost Rate (ICR) %:			
ICR Approval Date:			
General Ledger Verified			

INVOICE BACKGROUND:

	Yes	No	N/A	Staff Initials	Date
Allowable Costs					
Approved Line Items as listed in Section 5310 Project Billing Workbook dated:					
Approved Line Items					
Monthly Beneficiary Data Report Included					
Credits Included					
Match Contribution Verified					
Budget Variances < 10%					
Supporting Documentation Attached (<i>required</i>)					
Project Billing Ledger Attached (<i>required</i>)					

SUMMARY:

Requested Action:

Review Signatures:

Assistant Transit Planner

Date

Principal Transit Planner

Date

FTA Section 5310

Agency Name

Grant FAIN

Agency Name					
Agreement #					
		Federal Match Ratio (%)		\$10,000	Local Match Ratio (%) \$0
Invoice #	Date	Federal Match	Local Match	Total Expenses	Comments
20001	8/6/2021	\$ 500.00	\$ -	\$ 500.00	March 2021
20002	8/6/2021	\$ 500.00	\$ -	\$ 500.00	April 2021
20003	8/6/2021	\$ 1,000.00	\$ -	\$ 1,000.00	May 2021
20004	8/13/2021	\$ 1,000.00	\$ -	\$ 1,000.00	June 2021
20005	8/27/2021	\$ 1,500.00	\$ -	\$ 1,500.00	July 2021
20006	10/5/2021	\$ 1,500.00	\$ -	\$ 1,500.00	August 2021
Total		\$ 6,000.00	\$ -	\$ 6,000.00	
Remaining Grant Balance		\$4,000.00	\$0.00	\$6,000.00	

FY22 (October 1, 2021 - September 30, 2022)
Section 5310 Invoice Tracking Sheet

October	November	December	January	February	March	April	May	June	July	August	September
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WA-2018-067

AGENCY	PROJECT	STA AGREEMENT #	CONTRACT START DATE		CONTRACT END DATE
Agency Name	Project Name	Agreement Number	3/3/2019		12/1/2021

1. Date Packet Received (Stamped)	1/11/2022	1/19/2022										
2. Date of Deficiency Notice Email	1/11/2022	NA										
3. Date Entered in MUNIS	1/21/2022	1/21/2022										
4. Date Paid in MUNIS	1/28/2022	1/28/2022										
Days to Process	10	2	0	0	0	0	0	0	0	0	0	0

Agency Name	Project Name	Agreement Number	1/10/2019		12/1/2021
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1. Date Packet Received (Stamped)	11/15/2021	12/13/2021	1/14/2022	2/14/2022								
2. Date of Deficiency Notice Email	11/18/2021	12/14/2021	1/20/2022	2/14/2022								
3. Date Entered in MUNIS	11/22/2021	12/15/2021	1/21/2022	2/23/2022								
4. Date Paid in MUNIS	12/3/2021	12/22/2021	1/28/2022	3/1/2022								
Days to Process	7	2	7	9	0	0	0	0	0	0	0	0

WA-2021-023

AGENCY	PROJECT	STA AGREEMENT #	CONTRACT START DATE		
Agency Name	Project Name	Agreement Number	4/1/2021		3/31/2023

1. Date Packet Received (Stamped)	11/18/2021	12/13/2021	1/14/2022	2/18/2022								
2. Date of Deficiency Notice Email		NA	12/13/2021	1/14/2022	2/21/2022							
3. Date Entered in MUNIS	11/19/2021	12/14/2021	1/28/2022	2/23/2022								
4. Date Paid in MUNIS	11/26/2021	12/22/2021	2/4/2022	3/1/2022								
Days to Process	1	1	14	5	0	0	0	0	0	0	0	0

Agency Name	Project Name	Agreement Number	12/1/2020		12/31/2022
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1. Date Packet Received (Stamped)	12/15/2021	12/30/2021	2/1/2022									
2. Date of Deficiency Notice Email	12/15/2021	1/7/2022	2/3/2022									
3. Date Entered in MUNIS	12/27/2021	2/9/2022	2/9/2022									
4. Date Paid in MUNIS	12/29/2021											
Days to Process	12	41	8	0	0	0	0	0	0	0	0	0

WA-2021-029

AGENCY	PROJECT	STA AGREEMENT #	CONTRACT START DATE		
Agency Name	Project Name	Agreement Number	3/1/2021		8/31/2022

1. Date Packet Received (Stamped)	11/16/2021	12/13/2021	1/14/2022	2/18/2022								
2. Date of Deficiency Notice Email	11/18/2021	12/13/2021	1/14/2022	2/21/2022								
3. Date Entered in MUNIS	11/19/2021	12/14/2021	2/1/2022	2/23/2022								
4. Date Paid in MUNIS	11/26/2021	12/22/2021	2/4/2022	3/1/2022								
Days to Process	3	1	18	5	0	0	0	0	0	0	0	0

SECTION 5310 REQUEST FOR REIMBURSEMENT
(& MONTHLY REPORT OF ACCRUED EXPENDITURES/BUDGET BALANCE)



SUBRECIPIENT:
STA Agreement #:
FAIN #:
FTA Match Ratio:

Month:
10% Budget Variance

Dec-20
86.40%

LINE ITEM	BUDGET	PRIOR MONTH TO DATE	MONTH	CURRENT TO DATE	BALANCE REMAINING	% BUDGET REMAINING
A. DIRECT PERSONNEL (Salaries)						
Director	\$ 90,334.00		\$ 870.20	\$ 870.20	\$ 89,463.80	99.04%
Supervisor	\$ 3,826.00		\$ 145.64	\$ 145.64	\$ 3,680.36	96.19%
DIRECT PERSONNEL (Benefits)	\$ 30,243.00		\$ 938.62	\$ 938.62	\$ 29,304.38	96.90%
SUBTOTAL	\$ 124,403.00		\$ 1,954.46	\$ 1,954.46	\$ 122,448.54	98.43%
B. OPERATING EXPENSES						
Local Travel	\$ 2,618.00			\$ -	\$ 2,618.00	100.00%
Communications	\$ 1,200.00		\$ 20.64	\$ 20.64	\$ 1,179.36	98.28%
Computer (Supplies)	\$ 1,875.00			\$ -	\$ 1,875.00	100.00%
Office Supplies	\$ 600.00			\$ -	\$ 600.00	100.00%
Marketing	\$ 6,780.00		\$ 719.33	\$ 719.33	\$ 6,060.67	89.39%
Seminars & Conference Travel Expenses	\$ 6,000.00			\$ -	\$ 6,000.00	100.00%
Dues & Subscriptions	\$ 888.00			\$ -	\$ 888.00	100.00%
Community Workshops (Supplies)	\$ 3,000.00			\$ -	\$ 3,000.00	100.00%
Website Development	\$ 3,400.00			\$ -	\$ 3,400.00	100.00%
SUBTOTAL	\$ 26,361.00		\$ 739.97	\$ 739.97	\$ 25,621.03	97.19%
C. TOTAL BUDGET	\$ 150,764.00		\$ 2,694.43	\$ 2,694.43	\$ 148,069.57	98.21%

Agency Name is requesting reimbursement in the amount of:

\$ 2,694.43

I CERTIFY UNDER PENALTY OF PERJURY, THAT THE ABOVE REPORT IS A TRUE AND COMPLETE REPRESENTATION OF THE INFORMATION CONTAINED IN OUR SOURCE RECORDS AND THAT I AM AUTHORIZED TO AUTHENTICATE AND CERTIFY TO SAID CLAIM.

X

Authorized Signer
Title

1. Scope

Section 5310 is a federal grant program provided by the Federal Transit Administration (FTA). The goal of the FTA 5310 Program is to improve the mobility of seniors and individuals with disabilities by removing barriers to transportation services and expanding the transportation mobility options available. Eligible projects include the procurement of accessible vehicles and related equipment. Eligible applicants include private nonprofits organizations, states or local government authorities and operators for public transportation. This procedure covers the procurement, acceptance, registration, delivery, and transfer of vehicles for and to subrecipients that qualify under the Section 5310 program and applies to STA positions responsible for the procurement, acceptance, registration, delivery, and transfer of vehicles under this program.

2. Procedures

Vehicle Procurement

- a. STA Assistant Transit Planner-Planning & Grants (PG) will work with the Washington State Department Enterprise Services (DES) vendor or other qualified vendor and subrecipient to identify the vehicle specifications.
- b. The DES or other qualified vendor will provide a quote/proposal to the Assistant Transit Planner-PG for the cost of the vehicle.
- c. The Assistant Transit Planner-PG will prepare an Approval Routing Form (ARF) which includes background and financial information of the project. It should be noted that in accordance with FTA Circular 9070.1G Section 16b(1), the federal share for vehicles complying with American Disability Act (ADA) requirements is 85% with a local match requirement of 15% from the subrecipient.
- d. The ARF will also include attachments as follows:
 - i. The executed Section 5310 Subrecipient Vehicle Purchase Agreement
 - ii. Independent Cost Estimate (ICE)
 - iii. Vehicle Quote
 - iv. System for Award Management (SAM) verification
- e. The ARF will be submitted to the Contracts Compliance Specialist to be routed for approval to the Principal Transit Planner-PG, Chief Planning and Development Officer, Senior Procurement Manager, Chief Financial Officer, and Chief Executive Officer.
- f. When the ARF is approved, the Assistant Transit Planner-PG may enter a purchase requisition in the enterprise resource planning (ERP) software system for the electronic routing of approvals.
- g. Email ARF to the Senior Financial Services Manager

Vehicle Delivery and Acceptance

- h. The Assistant Transit Planner-PG will coordinate with the DES vendor or other qualified vendor for information on vehicle build process and estimated delivery.
- i. Once the build process is complete, the DES vendor or other qualified vendor typically notifies the Assistant Transit Planner-PG of the expected vehicle delivery date:
 - i. The Assistant Transit Planner-PG will inform the DES vendor or other qualified vendor of the delivery address (typically 1229 W Boone Ave., Spokane, WA 99201) and mention that all original documents must be submitted to STA.
 - ii. The Assistant Transit Planner-PG will notify the Senior Vehicle Maintenance Manager and Maintenance Administration Assistant of the expected delivery date.
 - iii. The Assistant Transit Planner-PG will notify the subrecipient of the expected delivery date and provide the Vehicle Identification Number (VIN) for insurance purposes and inform the subrecipient that they will be responsible for all subsequent fees.
- j. The DES vendor will submit an invoice to STA for the cost of the vehicle. The Assistant Transit Planner-PG will confirm Buy America requirements have been met before processing this invoice with the accompanying Purchase Order number.
- k. The Assistant Transit Planner-PG will request an invoice be issued from the Senior Financial



Services Manager via email to the subrecipient for the total of the local match requirement.

- l. Upon vehicle delivery, the Senior Vehicle Maintenance Manager will complete a Vehicle Condition Report and note any discrepancies or observations regarding the condition of the vehicle.
- m. Assistant Transit Planner-PG will receive original documents and make copies of each document, then give the originals to the subrecipient needed to register the vehicle as follows:
 - i. Certificate of Origin
 - ii. Bill of Sale
 - iii. Receipt of Vehicle
 - iv. Vehicle Registration
 - v. Odometer Disclosure/Title Extension Statement
 - vi. Warranty documents (if applicable)

Vehicle Registration

- n. The Assistant Transit Planner-PG will verify with the Senior Financial Services Manager that STA has received the local match check from the subrecipient.
- o. The Assistant Transit Planner-PG will verify with the subrecipient that the vehicle is insured and receive a copy of the policy.
- p. The Assistant Transit Planner-PG will coordinate with the subrecipient on a date and time to meet at the Department of Licensing (DOL) to register, title, and license the vehicle as well as make sure all the proper forms are obtained before the appointment.
- q. The Assistant Transit Planner-PG will inform the subrecipient of their responsibility to pay for all licensing, titling, and registration fees.
- r. Prior to meeting at the DOL, the Assistant Transit Planner-PG will complete a Vehicle Title Application form:
 - i. STA will remain the legal owner (lienholder) and the subrecipient will be the registered owner of the vehicle.
 - ii. Dealer information is found on the Certificate of Origin.
 - iii. The application must be notarized and signed by the Principal Transit Planner-PG.
- s. The Assistant Transit Planner-PG will take all original documents noted in Step 2.m. to the DOL and meet the subrecipient to complete the registration process.
- t. The Assistant Transit Planner-PG will fill out and complete an Odometer Disclosure/Title Extension Statement.
- u. The subrecipient will pay for all licensing, titling, and registration fees consistent with Step 2.p.
- v. Once the vehicle has been registered, the Assistant Transit Planner-PG will file copies of all registration documents.

Vehicle Release to Subrecipient

- w. After the vehicle has been registered, the Assistant Transit Planner-PG and subrecipient will meet the Senior Vehicle Maintenance Manager at STA's Boone campus.
 - i. The subrecipient will sign any required documents.
 - ii. The keys will be handed off to the subrecipient.
 - iii. The Assistant Transit Planner-PG should use this opportunity to take photos of the vehicle and subrecipient for reporting and STA newsletter purposes. Advance notice shall be given to STA's Communications Department so their staff can take professional photos for use in the STA newsletter. If they cannot attend, the Assistant Transit Planner-PG will inform the Principal Transit Planner-PG so they can take the photos for the Communications Department.
 - iv. The Assistant Transit Planner-PG should use this time to inform the subrecipient of reporting requirements noted in the agreement and reassure them that STA staff is available to guide them through the process.
- x. The Assistant Transit Planner-PG will submit vehicle documents to the Accounting Specialist who files the documents due to STA being the legal owner.
- y. The Assistant Transit Planner-PG will also keep copies of all required documents in the

subrecipient's project file:

- i. Procurement ARF
 1. The executed Section 5310 Subrecipient Vehicle Purchase Agreement
 2. Independent Cost Estimate (ICE)
 3. Vehicle Quote
 4. SAM verification
- ii. DES invoice to STA
- iii. STA invoice to subrecipient for local match
- iv. Vehicle Condition Report
- v. Certificate of Origin
- vi. Bill of Sale
- vii. Receipt of Vehicle
- viii. Vehicle Registration
- ix. Odometer Disclosure/Title Extension Statement
- x. Local match payment (check)
- xi. Subrecipient proof of insurance
- xii. Vehicle Title Application
- xiii. Warranty documents (if applicable)
- xiv. Registration Certificate
- xv. Temporary Registration
- xvi. Copy of Receipt of Registration payment
- xvii. Signed Receipt of Vehicle document
- xviii. Photos of vehicle detailing its condition

Vehicle Title Transfer to Subrecipient

- z. The Assistant Transit Planner-PG shall continuously monitor the vehicle to determine the remaining useful service life and disposition of the Section 5310 funded vehicle. This is done by conducting on-site vehicle inspections, collecting vehicle mileage logs, and collecting maintenance records provided by subrecipient on a quarterly basis.
- aa. The Assistant Transit Planner-PG shall prepare and certify a project closeout checklist when the vehicle has reached the end of its useful service life. To determine the end of the vehicle service life, an odometer photo will be used to verify the useful service life mileage. Assistant Transit Planner-PG will review the Section 5310 Program Management Plan (PMP) to determine if the vehicle meets the service life or mileage transfer thresholds. This information is obtained from the referenced FTA Circular.
- bb. The Assistant Transit Planner-PG shall prepare an ARF including a short narrative summarizing the vehicle's purpose and use, title transfer justification, and supporting documentation that includes Section 5310 subrecipient agreement and project closeout checklist shall be approved by the Assistant Transit Planner-PG, Principal Transit Planner-PG, and Chief Planning and Development Officer.
- cc. The Assistant Transit Planner-PG shall submit a copy of the fully executed ARF to the Accounting Specialist to receive the vehicle's title.
- dd. The Assistant Transit Planner-PG shall obtain the Senior Procurement Manager's signature on the vehicle title.
- ee. The Assistant Transit Planner-PG shall meet with the subrecipient at the DOL to obtain a signature on STA's Transfer As-Is Document and make copies for STA's records prior to releasing the vehicle to the subrecipient.
- ff. The Assistant Transit Planner-PG will submit a copy of the fully executed documents including the ARF, copy of signed title, and a copy of the new title, which shows the subrecipient as the owner, to the Senior Financial Services Manager.
- gg. The Assistant Transit Planner-PG shall file a copy of the fully executed documents in the subrecipient's project closeout folder.



- i. Project closeout checklist
- ii. ARF
- iii. Copy of signed title, releasing STA of ownership
- iv. Copy of new title with subrecipient as owner

3. Definitions

4. Related SOP(s), Form(s), and Other Resource(s):

- a. Related SOP(s):
- b. Form(s):
 - Vehicle Title Application
 - Project Closeout Checklist
- c. Other Resources
 - 49 USC Section 5310
 - Circular 9070.1g, specifically Chapter VI
 - Circular 5010.1e, specifically Appendix E
 - 2 CFR 200.313 Subpart D
 - STA Section 5310 Program Management Plan

Approved By:

Karl Otterstrom, Chief Planning and Development Officer

Date:3/21/2023**Revision History:**

Version No.	Effective Date	Description