

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

Draft for Public Comment

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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 9070.1H (November 1, 2024), 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.

The PMP reflects:

- FTA Circular 9070.1H, Enhanced Mobility of Seniors & Individuals with Disabilities (applicable November 1, 2024)
- FTA Circular 5010.1F, Award Management Requirements (applicable November 1, 2024)
- The Office of Management and Budget (OMB) Uniform Administrative Requirements, Cost Principles, Audit Requirements at 2 CFR Part 200, as revised in 2024 and implemented by FTA.

Section 1 – Purpose of the PMP

The Section 5310 PMP outlines Spokane Transit Authority's (STA) policies and procedures, and administrative framework to manage Section 5310 funds in the Spokane Urbanized Area (UZA). STA maintains the PMP in a form that is readily accessible to potential subrecipients, STA staff, FTA, and the public, and uses it to document program objectives, roles and responsibilities, procedures, and administrative requirements (C 9070.1H p.VII-1).

PMP Review Process

The PMP is updated as necessary to reflect program expansions or enhancements and any changes in program management, requirements, or guidance. At least once every three years (see table below), STA submits the PMP to FTA for review and approval. STA may also make interim administrative edits for clarity that do not change policy (FTA C 9070.1H, p. V-4). Substantive changes that revise policy, procedures, or compliance expectations are recorded in the PMP Change Log and communicated to stakeholders. For substantive revisions, STA will post the draft on its website and send a copy to interested parties (Section 5310 listserv, subrecipients, SRTC, WSDOT, and local jurisdictions) for a thirty-day public comment period. All public comments received within the review period will be addressed in the attachments of the final draft (C 9070.1H, p. VII-1). STA will submit the final draft PMP to the FTA Regional Office for review and approval (C 9070.1H p. VII-2). Upon FTA approval, STA will notify interested parties of FTA's approval and make the approved PMP available on STA's website and submit the final PMP (with any FTA-directed edits) to the FTA Regional Office. (C 9070.1H, p. VII-2)

Background and Program Goal

The Section 5310 grant program was established in 1975. 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 (CPT-HSTP) 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.

As STA's COVID-relief funds are fully program or expended, new Section 5310 awards will follow the program's standard match requirements unless otherwise specified by FTA: typically 80% federal and 20% local for capital and 50% federal and 50% local for operating, with ADA/CAA exception of 85% federal 15% local for qualifying revenue vehicles and 90% federal and 10% local for vehicle related equipment facilities.

Section 2 – Roles & Responsibilities

STA as the Designated Section 5310 Recipient

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.

In December 2012, the Governor of Washington designated STA as the recipient of FTA Section 5310 funds for the Spokane UZA (Attachment B). As the designated recipient, STA develops and maintains a Program of Projects (POP) for each Section 5310 award. Federal statutes require STA to submit a POP and POP status report annually for all current, and active awards that include the following:

- Total number of projects and funding source
- Total number of subrecipients

- Identify each subrecipient type (for example, governmental authorities, private nonprofits agencies, or operators of public transportation)
- Identify any that are Indian tribal governments or tribal transit agencies (including both federally recognized and other tribal governments).
- Brief description of counties served
- Tribal needs served
- Total project cost
- Federal share
- Project type (“traditional” or “other”)

At STA’s discretion, the agency may conduct a public Call for Projects for funds apportioned to the Spokane UZA. STA submits Section 5310 projects to SRTC for inclusion in the Transportation Improvement Program (TIP) and develops and publishes the POP using a public participation process consistent with 49 U.S.C. 5307(b).

STA develops an annual Transit Development Plan (TDP) that contains the Annual Report, Service Improvement Program, and Capital Improvement Program. The TDP includes a description of Section 5310 and 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. The TDP serves as the public participation process for the federal program of projects.

Federal Financial Report and Milestone Progress Reports

STA submits quarterly Federal Financial Reports (FFR) and Milestone Progress Reports (MPR) in FTA’s Transit Award Management System (TrAMS). The FFR’s and MPR’s document project progress relative to the approved budget, scope, and schedule, serve as key tools for monitoring subrecipient compliance, performance, and adherence to federal requirements. To support STA’s federal reporting responsibilities, subrecipients must submit timely financial invoices and project status updates in accordance with the schedules, conditions, and documentation requirements specified in their subrecipient grant agreements.

STA Responsibilities for 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 (POP) to the FTA
- Review federal compliance of subrecipients
- 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
- Ensure at least 55% of Sections 5310 funds allocated to STA are spent on traditional 5310 projects by eligible subrecipients, where applicable

- Oversee the implementation and selection of projects as developed and prioritized in the CPT-HSTP
- Provide grant management and oversight
- Submit reports as required by the FTA
- Comply with requirements outlined in 2 CFR Part 200
- Ensure compliance with
 - Title VI of the Civil Rights Act of 1964
 - Equal Opportunity Act
 - Disadvantaged Business Enterprise
 - Americans with Disabilities Act
- Oversee project audit and closeout

Responsibilities of 5310 Subrecipients

All subrecipients that receive Section 5310 funds must comply with the OMB Uniform Guidance at 2 CFR Part 200, including standards for financial management, internal controls, record retention, audits, and subrecipient monitoring and management. Subrecipients must also comply with applicable FTA circulars, the executed agreement with STA, and STA’s program management policies.

Role of the Spokane Regional Transportation Council (SRTC)

SRTC is the federally designated Metropolitan Planning Organization (MPO) and the state-designated Regional Transportation Planning Organization (RTPO) for Spokane County. SRTC prepares, adopts, and amends the regional TIP through a cooperative, performance-based planning process and maintains the Spokane County CPT-HSTP. At STA’s request, SRTC may provide technical assistance by participating in the evaluation and scoring of Section 5310 project applications.

Regional Coordination

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 CPT-HSTP. The CPT-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. Outreach efforts for Statewide Transportation Improvement Program (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.

STA will partner with SRTC to update the CPT-HSTP plan every four years. The CPT-HSTP was updated and approved by the SRTC Board in November 2022. The next update to the CPT-HSTP will be prepared for 2026-2029. All applicable revisions identified in the outreach and needs assessment impacting 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 Coordinated Public Transit-Human Services Transportation Plan can be found on [SRTC’s Transit Planning webpage](http://www.srtc.org/our-work/transit-planning/). (www.srtc.org/our-work/transit-planning/)

STA also strongly encourages applicants to coordinate with existing community partners when developing service proposals. These may include other transportation service providers, health and human service organizations, healthcare facilities, nonprofit agencies, for-profit contractors, local

governments, and other regional stakeholders. Collaborative planning and joint project development help ensure program efficiency, reduce duplication of services, and enhance transportation access for target populations. Projects that do not demonstrate alignment with the CPT-HSTP or fail to demonstrate meaningful stakeholder coordination will not be considered eligible for funding under the Section 5310 program.

Section 3 - Eligible Subrecipients and Activities

Eligible Subrecipients

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 state or local government authority that:
 - Is approved by a State to coordinate services for seniors and individuals with disabilities; or
 - Certifies that there are no nonprofit organizations readily available in the area to provide the service

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

- State or local government authority
- Private nonprofit organizations
- An operator of public transportation that receives a Section 5310 grant indirectly through a recipient

Private transportation operators and Transportation Network Companies (TNC) that provide shared-ride on-demand service to the general public on a regular basis are operators of public transportation and, therefore, eligible subrecipients. “Shared ride” is defined as two or more passengers in the same vehicle who are otherwise not travelling together. Similar to general public and ADA Demand Response (DR) service, every trip does not have to be shared-ride in order for a taxi company or TNC to be considered a shared-ride operator, but the general nature of the service must include shared-rides. (C 9070.1H p. III-5).

Eligible Activities

Section 5310 funds are available for capital and operating expenses to support the provision of transportation services to meet the specific needs of seniors and individuals with disabilities.

At least 55 percent of STA’s annual apportionment must support “traditional” Section 5310 capital projects carried out by eligible subrecipients; up to 45 percent may fund “other” eligible Section 5310 capital and operating projects. STA requires applicants to identify whether they seek “traditional” or “other” funding in their preliminary application to ensure compliance with the statutory distribution between these categories. Projects must start or end within the Spokane Urbanized Area (UZA).

Eligible subrecipients and activities must follow FTA Circular 9070.1H.

“Traditional” 5310 projects are public transportation capital projects designed to meet the special needs of seniors and individuals with disabilities and must meet the definition of a capital project, as defined in 49 U.S.C. 5302. Traditional 5310 Projects include, but are not limited to:

- Polling stock and related activities for Section 5310 funded vehicles
 - Acquisition of expansion or replacement buses or vans, and related procurement,

- testing, inspection, and acceptance costs
 - Vehicle rehabilitation or overhaul
 - Preventive maintenance
 - Radios and communication equipment
 - Vehicle wheelchair lifts, ramps, and securement devices
- Passenger facilities related to Section 5310 funded vehicles
 - Purchase and installation of benches, shelters, and other passenger amenities
- Support facilities and equipment for Section 5310 funded vehicles
 - Extended warranties that do not exceed the industry standard
 - Computer hardware and software
 - Transit-related intelligent transportation systems (ITS)
 - Dispatch systems
 - Fare collection systems
- Lease of rolling stock or related equipment
 - Governed by 2 CFR Part 200 and FTA Circular 5010.1F
- Acquisition of transportation services contract, lease, or other arrangement
- Mobility management and coordination programs among Public Transportation Providers and Other Human Service Agencies Providing Transportation.
- Additional traditional projects are authorized by FTA Circular 9070.1H.
- Other capital expenses as defined in 49 U.S.C. 5302

“Other” Section 5310 projects include eligible capital or operating projects that exceed ADA requirements, decrease individuals’ reliance on complementary Paratransit, or provide alternatives to public transportation to seniors and people 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:

- Public Transportation Projects that Exceed the Requirements of the ADA
 - Enhancing Paratransit beyond minimum ADA requirements
 - Feeder services
- Public Transportation Projects that Improve Accessibility
 - Making accessibility improvements to transit and intermodal stations not designated as key stations
 - Travel training
- Public Transportation Alternatives that Assist Seniors and Individuals with Disabilities with Transportation
 - Purchasing vehicles to support accessible taxi, TNC, ride-sharing, and/or vanpooling programs
 - Supporting the administration of and expenses related to voucher programs for transportation services offered by human service providers
 - Supporting volunteer driver and aide programs
 - Support for driver programs that transport seniors and people with disabilities.
- Additional projects as authorized by FTA Circular 9070.1H.

Section 4 – Funding and Local Match Requirements

Federal local match requirements are applicable with capital projects at an 80% federal and 20% local funding split and operating projects at a 50% federal and 50% local split. Subrecipients must document

the source and the amount of the local match in their applications and maintain supporting records. Subject to STA Board approval, STA may contribute local match to offset subrecipient local match requirements for both “traditional” and “other” projects. STA may use up to 10 percent of the annual apportionment for administrative costs with no local match requirement.

Exceptions: To comply with or maintain compliance with the Americans with Disabilities Act (ADA) or the Clean Air Act (CAA) (42 U.S.C. 12101 and 49 CFR 38), the federal share may be higher for certain capital expenses, may be funded up to 85% federal share. Vehicle-related equipment and facilities may be funded up to 90% federal share when the purchase complies with ADA/CAA. For this purpose, FTA considers “vehicle-related equipment” to be equipment on and attached to the vehicle.

Sources of Local Match

Eligible local match sources may include state or local appropriations, dedicated tax revenues, private donations, revenue from service contracts, transportation development credits, and net income generated from advertising and concessions. For operating assistance, income from contracts to provide human services transportation may either reduce the net project cost (treated as revenue) or serve as local match. Federal funds may not be used as local match unless the other federal program’s statute or guidance explicitly permits it.

In-kind contributions such as donations, volunteered services, or contributed use of space may count toward the local match if the value is documented and supported, would otherwise be an eligible cost, and is included in the project budget for operating projects. In-kind match is generally not accepted for rolling-stock capital (e.g., vehicle purchases). Applicants should consult STA early when proposing an in-kind match. STA requires applicants to identify the projects intended source of local match in the preliminary application (2 CFR 200.306).

According to STA’s Subrecipient Billing Standard Operating Procedures, in-kind contributions are applied on a monthly basis. Volunteer services used as match must be:

- Verifiable from the subrecipient's records
 - Such as, verifiable valuation records (date, name, activity, hours/miles, rate, calculations)
 - Rates must be valued with similar work in your labor market (national volunteer rate)
- Necessary and reasonable for achieving the objectives of the federal award
- Not included as contributions for any other federal award
- Integral to the project scope of work
- Not paid by the federal government under another federal award, except where program's federal authorizing statute specifically provides that federal funds made available for the program can be applied to cost sharing requirements of other federal programs

Section 5 - Annual Funding Distribution

Call for Projects

FTA publishes the formula funding apportionments in the Federal Register annually which includes the Section 5310 apportionment. STA issues a Call for Projects following the publishing of the full-year apportionments notice. The table below illustrates the Section 5310 Call for Projects solicitation process.

Section 5310 Call for Projects Timeline	
Month(s)	Action
Jan-May	Annual apportionments are published in the Federal Register
Jul	STA issues call for projects
Jul	Informational meeting for eligible applicants
Aug	Call for projects preliminary proposals due
Sep	Call for projects final project applications due
Oct	Evaluation committee ranks project applications
Dec	Present recommended list of projects to Planning and Development Committee
Dec	STA Board makes final decision on awarding funds
Jan	Send applicants formal STA decision letter(s)
Mar	Publish 5310 program of projects and submit grant to FTA

The timeline is subject to change based on actual date FTA publishes the apportionment, and staffing. STA will publish an adjusted schedule with each Call for Projects (In case of a revised Call for projects, the timeline may be expedited).

STA conducts a competitive selection process that includes a public notice of available funds published on STA and SRTC websites, in the local newspaper, and email distribution to the Section 5310 listserv.

STA will maintain an updated list of nonprofits and private providers of transportation that qualify as eligible Section 5310 subrecipients. STA will issue a public notice announcing the Section 5310 Call for Projects to all parties on the Section 5310 listserv. Eligible 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, to provide interested parties the opportunity to inquire about the Section 5310 program.

Applications are evaluated by an impartial committee 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 (CPT-HSTP).

Preliminary Proposal Eligibility Review

Applicants 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 in the Preliminary Proposal form (Attachment H).

Eligibility Review

The eligibility review is reflected in the following criteria:

- Applicant is an eligible subrecipient for Section 5310 funds (as defined in Section 3).
- 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.

All applicants are required to meet with the Assistant Transit Planner to review project scope, budget, and risk assessment before the preliminary proposal due date. STA may notify an applicant that their

project is ineligible prior to the final application due date.

Risk Assessment

STA assesses the risk of each applicant and subrecipient to determine whether additional monitoring or contract conditions are necessary to ensure compliance. The assessment considers factors prescribed by OMB Guidance 200.331 and STA's adopted criteria. STA uses applicant-specific risk assessments for new applicants and returning subrecipients (Attachment G).

Applicants that rank as high-risk may be subject to additional conditions, monitoring, or documentation requirements. Applicants with a high-risk designation will be required to meet with the Assistant Transit Planner prior to the preliminary proposal due date. The following situations may result in a high-risk designation:

- New applicants with no previous experience with federal grant management or no developed Title VI program.
- Returning subrecipients that have the following,
 - Lack of progress on scope of work deliverables
 - Unresolved findings from monitoring review
 - Late report submissions in the prior year (e.g., requests for reimbursement, quarterly reports).
 - Incomplete submissions in the prior year (e.g., requests for reimbursement, quarterly reports)
- All Applicants
 - Accounting system does not separate and track grants individually
 - Failure to produce the most recent year for applicants meeting the Single Audit threshold (\$1,000,000)
 - Audit or financial review conducted within the past two years with material findings

Any applicant identified as debarred or excluded (e.g., via federal or state exclusion lists) is automatically disqualified.

Final Project Applications – Intake Review

STA removes all applications submitted after the posted due date from consideration. The application will then be reviewed for completeness and concurrence with regional transportation needs by STA staff before the application can advance to the Evaluation Committee scoring.

The required documentation for subrecipients to provide as the final project application includes (as applicable):

- Final Project application (Attachment I) – project costs, project information, projected levels of service, agency experience, budget narrative worksheet, signed by an authorized official from the agency (e.g., CEO or Board Member)
- Capacity and capability information as may be required by STA following the Preliminary Proposal Risk Assessment
- Non-profit status documentation (articles of incorporation and IRS tax I.D. letter)
- Letter certifying the source and amount of local share (matching) funds, signed by an authorized official from the agency (e.g., CEO or Board Member)
- Independent audit report (or equivalent) with copies of any management letter(s)
 - Single audit report for applicants with \$1,000,000 or more in federal funds per year

- Signed certifications, including:
 - Lobbying certification
 - Title VI certification
 - Suspension & Debarment 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, signed by an authorized official from the agency (e.g., CEO or Board Member)
 - Subrecipients who choose to adopt portions of STA’s Title VI Program are required to follow STA’s update schedule
- Risk Assessment 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 Federal Transit Administration or the applicant’s cognizant agency within the last year.
 - Applicants who do not have a current federally approved indirect cost, may choose to use up to the 15% de minimis rate of modified total direct costs (MTDC) for new federal awards issued October 1, 2024, and after this date. STA is authorized to determine the appropriate rate up to this limit (2 CFR 200.414).

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. Spokane Transit staff considers the status of current awards before recommending additional funds for a subrecipient, this might result in a partial award or a recommendation to the subrecipient to apply for funds in a subsequent call for projects.

Application Scoring & Criteria

Project applications that meet the minimum criteria listed above will be evaluated by a committee comprised of representatives of STA, SRTC, and WSDOT to ensure there is no conflict of interest. This committee will evaluate projects using the Final Grant Application Scoring Criteria (Attachment J) listed below.

- Risk Assessment- 10 Points
 - Assigned risk classification (10 points)
- Application Completeness- 10 points
 - Are all questions answered, and does the content of the answer provide sufficient background when applicable? (5 points)
 - Were all required attachments submitted in final application? (5 points)

- Regional Transportation Needs- 15 points
 - Are the needs and strategies identified, and does the project clearly address how the needs and strategies will be met? (15 points)
- Proposed Service Improvements- 15 points
 - Are the barriers identified, and does the project clearly address how they will be overcome? (15 points)
- Financials – 20 points
 - Is the local match for this project secured? (5 points)
 - Does the budget narrative clearly describe each line item and explain the basis for its cost using estimates or data? (5 points)
 - Is there a clear and realistic sustainability plan once Section 5310 funding ends? (10 points)
- Performance Measures- 15 points
 - Review the methodology for tracking and calculating the number of individuals served and/or trips provided. (15 points)
- Management- 15 points
 - Are all staffing needs addressed (e.g. are requested positions filled or is a plan in place to fill them)? (5 points)
 - Does the applicant demonstrate adequate experience with federal funds and grant compliance? (10 points)

Awarding Funds

Once project application scoring is completed, STA Planning staff recommend funding allocations to the STA Board of Directors for approval. Once the funding recommendations are approved, staff sends out final decision letters to all eligible applicants. STA reserves the discretion to award less funding than requested based on scoring results and funding recommendations.

FTA Concurrence

Remaining Traditional requirement funds may be used by STA for Human Services Transportation project, which will be part of a separate request for proposals. After this request for proposals, if 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 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 (C 9070.1H p. III-5).

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 Coordinated Public Transit-Human Services Transportation Plan (CTP-HSTP).

Section 6 - Agreement Development

Agreements

Final decision letters will notify applicants of the total project funds awarded or information for those projects not recommended for funding. 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. Subrecipients receiving continuation awards will have their scope of work based on the previously approved scope of work, remaining project funds, and estimated spend down date. 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 and budget. 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 (C 9070.1H p. I-5).

1. Applicants must comply with all federal requirements, failure to do so will render a project ineligible for FTA financial assistance.
2. 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.
3. Pre-award funds are subject to the availability of funds and grant award. 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 good standing (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

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 (FFATA)

FTA requires that recipients report subaward information for all subawards over \$30,000 by the end of the month following the date of an executed agreement to in the [SAM.gov website](http://www.sam.gov/). (www.sam.gov/)

FTA also requires each subrecipient to report the names and total compensation of each of the subrecipient's five most highly compensated executives for the subrecipient's preceding completed fiscal year. (Attachment E) 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 and to reflect the total amount of the subaward.

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 greater than 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 Standard Operating Procedures (Attachment C) and 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 Vehicle Procurement and Transfer for Qualified Subrecipients (Attachment F). A certification of compliance will be incorporated into the 5310 application and subrecipient agreement with Spokane Transit Authority.

Financial Management

Spokane Transit Authority complies with all applicable standards set forth in 2 CFR Part 200 and guidance in the FTA "Grant Management Guidelines" FTA Circular 5010.1F (November 1, 2024) regarding 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 used first for program-related needs for which they were awarded and may also be used to meet other transportation needs (including other federal program needs) so long as this does not interfere with

the originally funded project activities and complies with the award's terms and conditions. Subrecipients must report incidental service through the monthly or quarterly reports. (C 9070.1H) If any vehicles are to be removed from service prior to the end of its useful life, the subrecipient must notify STA prior to doing so.

Vehicles must be used through useful service life. Any pause in service must be reported through email or in the corresponding monthly, or quarterly report with a written explanation of the cause and damage, the repair plan, and a scheduled date to have the vehicle inspected.

Useful Service Life

STA follows the useful service life benchmark criteria in the FTA Award Management Requirements circular (C 5010.1F p.IV-35). Unless otherwise approved by FTA, the following minimums apply:

- Large, heavy-duty transit buses (e.g., 35-40 ft+, including over-the-road and articulated)
 - 12 years or 500,000 miles, whichever comes first
- Small heavy-duty buses
 - 10 years or 350,000 miles, whichever comes first
- Medium-size, medium-duty buses
 - 7 years or 200,000 miles, whichever comes first
- Medium-size, light duty transit buses
 - 5 years or 150,000 miles, whichever comes first
- Light-duty vehicles (e.g., vans, sedans, light-duty buses)
 - 4 years or 100,000 miles, whichever comes first

Vehicle Title

STA maintains continuing control of Section 5310-funded vehicles during their useful service life to ensure public transit benefit. During the useful service life, STA is listed on the title and the subrecipients are listed as the registered owner. Once a vehicle meets its useful service life and all FTA conditions are satisfied, STA will transfer the title to the subrecipient consistent with Section 5310 policy and STA vehicle transfer procedures (49 U.S.C. 5334(h); C 5010.1F; C 9070.1H).

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 9050.1A and FTA Circular 5010.1F.

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 (“open door service) are required to report to the NTD. Client and center-based transit services are not considered public transit services.

Transit Asset Management (TAM)

In general, Spokane Transit is not required to report on 5310 subrecipients for TAM. Only agencies that provide public transportation (“open door service) are required to report on TAM. Client and center-based transit services are not considered public transit services.

Accounting Systems

Each subrecipient must maintain financial management system that can identify, track, and report Section 5310 project activity separately within its accounting records (e.g., a distinct grant or project ledger), including the amount, source, and expenditure of federal funds and required match. Systems must support accurate reporting, effective control over funds, property, and assets, and written procedures for payments and allowability of costs (2 CFR 200.302; 200.303). The subrecipient must 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 retain all data, documents, reports, records, contracts, and supporting materials relating to the project for three years from the date of the final expenditure report submission to FTA. This information is subject to the Uniform Guidance expectations (e.g., litigations/claims, equipment records retained three years after disposition, program-income records after the period of performance) and 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

STA follows Uniform Guidance Subpart F to ensure required audits are performed and resolved and notify FTA of any material matters. Subrecipients receiving \$1,000,000 or more in all federal sources in a single fiscal year must obtain a Federal Single Audit for that year and submit a copy to STA for review. Subrecipients below the threshold are exempt from the federal audit requirements but must still make records available for review upon request (2 CFR 200.501).

Subrecipient’s must arrange the audit, prepare the SEFA and financial statements, provide access to records, and take timely corrective action on any findings. The completed reporting package and data collection form must be submitted to the Federal Audit Clearing hours within 30 days after receipt of the auditor’s reports or within nine months after the end of the audit period, whichever is earlier (2 CFR 200.508; 200.512). Subrecipients are responsible for providing prompt follow-up and corrective action on all audit findings and recommendations. STA will review audits provided by subrecipients and (1) Promptly evaluate the Audit Report; (2) Determine the appropriate follow-up actions and establish a date for their completion; and (3) Complete all required actions within the established period of time.

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 de minimis rate allowed under 2 CFR Part 200. If subrecipients select to use the 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. Recipients of Section 5310 federal funds (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

The subrecipient must request an agreement extension which will be reviewed and approved by the STA Chief Executive Officer. 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. Any amendments to the project budget that will not increase or decrease total project funds may be reviewed by the Assistant Transit Planner and approved by the Principal Transit Planner. The Assistant Transit Planner will check for the debarment of the subrecipient using SAM.gov prior to amending projects.

Mandatory Disclosures

STA requires prompt, written disclosure of certain integrity matters in connection with any STA-funded award. Subrecipients must disclose whenever they have credible evidence of: (1) a violation of federal criminal involving fraud, conflict of interest, bribery, or gratuity violations under Title 18, U.S.C., or (2) a violation of the civil False Claims Act (31 U.S.C.). Disclosures must be made in writing to STA; STA will then promptly forward such disclosures to the FTA and office of Inspector General (OIG). In addition, when applicable, recipients and subrecipients must report recipient integrity and performance matters consistent with Appendix XII to 2 CFR Part 200. Failure to disclose may trigger Uniform Guidance remedies.

Grant and Project Closeout

This section describes STA's closeout obligations and the required action of the subrecipients under Section 5310. STA's timelines for projects, and grant closeouts align with Uniform Guidance and closeout provisions and FTA award management requirements.

Subrecipient (project level): Within 90 calendar days after the project activities have been completed or the funds associated with the award have been reimbursed, subrecipients will complete a closeout package to finalize the closeout activities (financial, performance, and any other project specific required reports).

STA (award level): After all projects in the grant are complete, STA closes out the grant in TrAMS within 120 days.

Subrecipient Closeout Checklist

- Final financial detail reconciling total eligible costs, federal share, and local match; identify unliquidated obligations (if any) and provide the final request for reimbursement.
- Final performance summary

The Assistant Transit Planner will have 90 days to fill out the Project Closeout Checklist for each individual project in the grant as they spend their funds down or all scope of work activities have been completed. STA will then initiate the full POP closeout with FTA within 120 days after all project activities contained within the grant award 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 (C 9070.1H p. V-2).

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 (C 5010.1F p. III-19). This will include:

- 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 Program of Projects (POP) and POP status report
- 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 must submit to STA, project data, scope of work objectives, budget information, and service metrics, sufficient for STA to monitor compliance with federal requirements and award terms. Material deviations from the approved scope, objectives, schedule, local match, or budget must be reported to STA promptly (e.g., prior to requesting reimbursement via email, or in the upcoming monthly/quarterly reports). Subrecipients planning on implementing changes that deviate from the originally outlined project application or subrecipient agreement require prior STA written approval consistent with the Uniform Guidance on revision to budget and program plans (2 CFR 200.308).

STA develops an annual monitoring plan for all active subrecipients that assigns review frequency, degree, and meeting type using a risk-based methodology (e.g., new 5310 subrecipient, scope of work progress, project type, spend-down, reporting performance, prior findings). Risk classification may be adjusted after a review based on significant findings. Subrecipients classified as high-risk, are subject to changes in both monitoring frequency and future funding recommendations in accordance with STA's subrecipient Oversight and Monitoring Procedures (2 CFR 200.332). STA updates monitoring checklists periodically to reflect current federal and STA requirements. STA may add or refine tools as needed.

FTA Performance Measures (reported annually by STA)

Consistent with FTA's Section 5310 program, STA reports the two program-level Government Performance and Results Act (GPRA) indicators listed below in its annual report to FTA.

- 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 people with disabilities afforded mobility they would not have without program support because of traditional Section 5310 projects implemented in the current reporting year.
- Ridership: Actual or estimated number of rides (as measured by one-way trips) provided annually for individuals with disabilities and seniors on Section 5310-supported vehicles and services because of traditional Section 5310 projects implemented in the current reporting year.

STA Project-level Reporting (applies to all Section 5310 Subrecipients)

- Quarterly Progress Reports: Subrecipients must submit quarterly status reports for the duration of the agreement using STA's Quarterly Progress Report (QPR). The schedule and content are specified in each QPR.
- Unduplicated Riders: In addition to FTA's program-level measures, STA required annual reporting of unduplicated riders (unique individuals served) for Section 5310 funded services to support local planning and equity analyses.

Project-Type Expectations

STA also required project-level reporting from subrecipients (e.g., unduplicated riders, service/physical improvements) to support local oversight and planning; these are STA requirements and do not alter FTA's GPRA set.

- **“Traditional”** projects (capital-focused) must submit:
 - Gaps in Service Filled (as defined by FTA)
 - Ridership (as defined by FTA)
 - Unduplicated riders (STA requirement)
- **“Other”** projects (e.g., mobility management, operating, travel training) must submit:
 - Gaps in Service Filled (as defined by FTA)
 - Ridership (as defined by FTA)
 - 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
 - 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 because of other Section 5310 projects implemented in the current reporting year
 - A brief narrative linking the improvements to outcomes for older adults and individuals with disabilities. (STA requirement)

Section 9 - Civil Rights and ADA Reporting

In order to receive federal funding, subrecipient awarded 5310 funding must submit Title VI Programs to STA in order to assist in compliance efforts. Subrecipients choosing to adopt STA’s Title VI plan are required to follow STA’s update schedule. STA program staff will use the Title VI Checklist to ensure that Title VI Plans meet all requirements.

Compliance Assistance

STA 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.
- **Disadvantaged Business Enterprise (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. If applicable, the subrecipient will use section two of the Monthly Beneficiary Report to submit on a monthly basis any DBE subcontracts name, amount, date, total, and amount spent during the quarter.
- **Equal Employment Opportunity (EEO) Program:** STA will require that any subrecipients that receive federal capital or operating assistance more than \$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 as part of the grant project. All applicable subrecipients will submit a Title VI certification form and a copy of their Title VI program for STA during the initial application review. Subrecipients shall submit Title VI Programs at least every three years to STA to assist with compliance efforts. Subrecipients choosing to adopt portions of STA's Title VI Program are required to follow STA's update schedule. 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 their language assistance plan to meet the needs of the individuals being served. All Title VI Programs are required to include information detailed in FTA Circular 4702.1B III-2-3 and Attachment C. 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 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.)
- USDOT 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."
- USDOT Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons (70 FR 74087, December 14, 2005)
- USDOT Order to Address Environmental Justice in Minority Populations and Low-Income Populations
- **ADA/Section 504:** Required clauses will be included in all subrecipient agreements and required for all third-party contracts the subrecipient enters as part of the grant project. Among other provisions, the regulations specify accessibility requirements for service delivery and the design and construction of new transportation facilities and vehicles.

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.

Lobbying Restrictions

Consistent with 31 CFR 21.110(a), STA and all Section 5310 applicants must submit a lobbying certification stating the organization has not, and will, not use federal funds to influence or attempt to influence any officer or employee of any federal agency, and any elected member of the legislative branch of the federal government regarding the award, extension, continuation, renewal, amendment, or modification of any federal contract, grant, loan, or cooperative agreement.

STA requires all agencies applying for Section 5310 funds to submit the lobbying certification statement required disclosure forms as an attachment to their Preliminary Proposal.

Suspension/Debarment

All Section 5310 applicants and subrecipients must certify that their agency is not excluded from federally assisted transactions and ensure that none of its third-party contractors, or subcontractors

are debarred, suspended, ineligible or voluntarily excluded from participation in the federally assisted transactions. STA will verify the applicants' and subrecipients' certification via SAM.gov.

Prohibition of Reprisals

Subrecipients must inform their employees in writing of employee whistleblower rights and protection under 41 U.S.C. 4712.

Charter and School Bus Service Restrictions

Charter service is governed by 49 U.S.C. 5323(d) and 49 CFR Part 604 and is generally prohibited. Exceptions may be granted only in limited circumstances explicitly outlined in the FTA circular or federal regulations and must be pre-approved by STA and/or the FTA.

STA and subrecipients shall comply with 49 U.S.C. 5323(f) and 49 CFR Part 605 (School bus Operations); FTA funded assets may not be used for exclusive school bus service. FTA's policy clarifies that "tripper service" is distinct from prohibited school bus operations. STA and subrecipients may adjust public regularly scheduled routes (e.g., extra trips, minor deviations near schools, fare collection adjustments) to accommodate increased demand so long as the service remains open to the general public and is not designated primarily for students.

Drug and Alcohol Testing

STA maintains an alcohol and drug-free workplace and requires all subrecipients to comply with applicable federal requirements. STA's policy is consistent with the Drug-Free Workplace Act of 1988 and cross-cutting FTA award management requirements (recipients must certify and maintain compliance as a condition of federal assistance). Recipients or subrecipients that receive only Section 5310 assistance are not subject to 49 CFR Part 655. Historically, STA has not received applications for vehicles requiring a Commercial Driver's License (CDL). However, subrecipients operating a CDL-classified vehicle would require compliance with the Federal Motor Carrier Safety Administration (FMCSA) regulations. Applicants requesting funds to procure a CDL-classified vehicle or subrecipient planning to employ CDL drivers, would be subject to the drug and alcohol testing requirements under 49 CFR Parts 40 and 382. In such cases, subrecipients must implement a compliant drug and alcohol testing program and notify STA to ensure appropriate oversight and reporting.

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 Standard Operating Procedures

Attachment D: Subrecipient Billing Standard Operating Procedures

Attachment E: Subrecipient Subaward Reporting Standard Operating Procedures

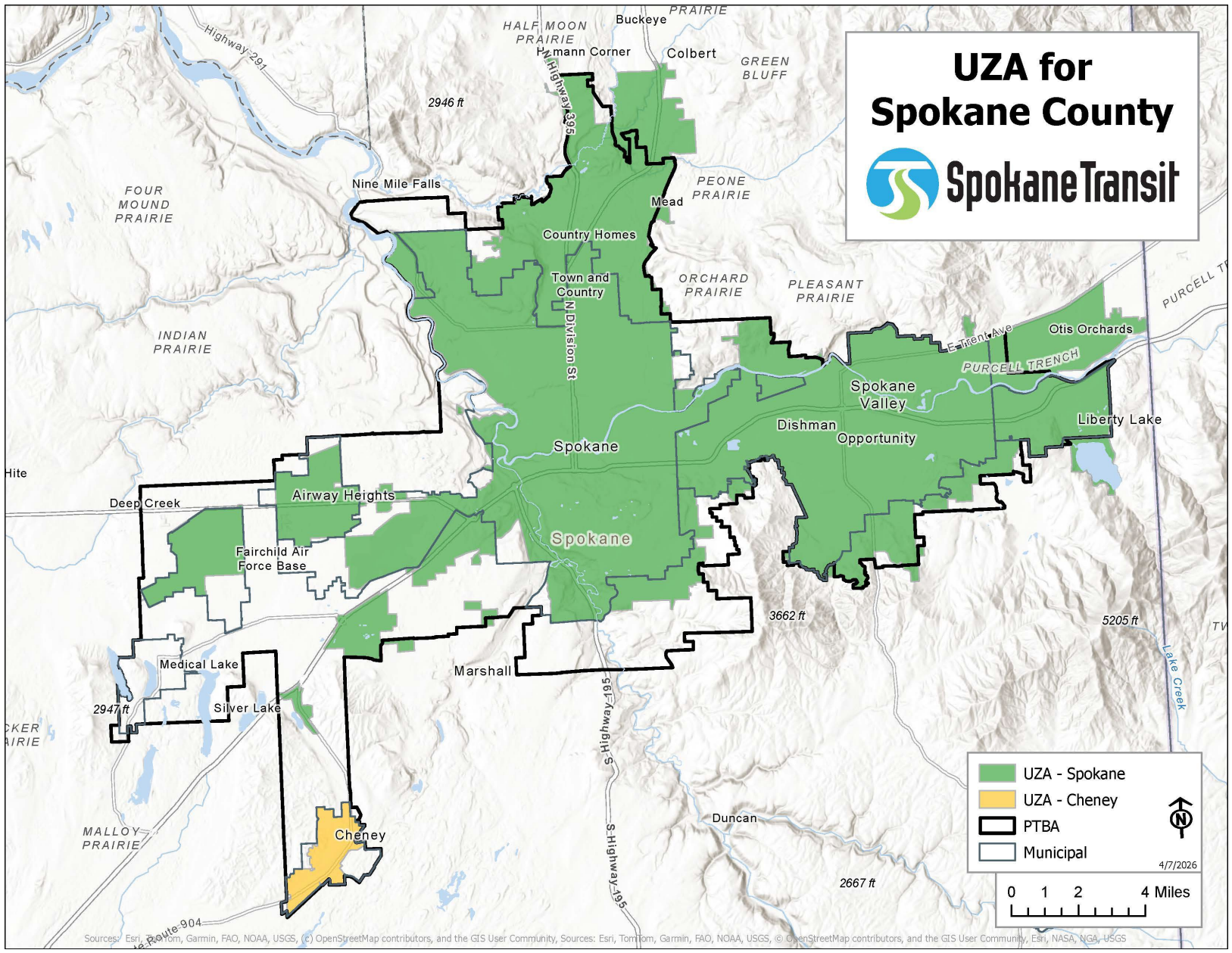
Attachment F: Vehicle Procurement and Transfer for Qualified Subrecipients

Attachment G: Risk Assessment

Attachment H: Preliminary Proposal

Attachment I: Final Project Application
Attachment J: Final Grant Application Scoring Criteria

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 webpage](http://www.spokanetransit.com/section-5310-program/). (www.spokanetransit.com/section-5310-program/)



NC
JW

CHRISTINE O. GREGOIRE
Governor



STATE OF WASHINGTON
OFFICE OF THE GOVERNOR

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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,

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 #:	3
Implementation Date:	2/22/2024
Last Revision Date:	6/2/2026

Spokane Transit Authority: Section 5310 Program

Subrecipient Monitoring and Oversight Standard Operating 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 5010.1F – 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 and Scoring Procedures

Applications will be scored in accordance with criteria listed in Spokane Transit’s Section 5310 Program Management Plan.

1. Reviewed by the Assistant Transit Planner and or Principal Transit Planner
 - a. Risk Assessment Form

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- b. Application Completeness
 - c. Regional Transportation Needs
2. Reviewed by Evaluation Committee
 - a. Proposed Service Improvements
 - b. Performance Measures
 - c. Management
 - d. Financials

All sections shall be completed prior to the Spokane Transit Planning & Development Committee meeting where Section 5310 funding recommendations are considered. Each applicant’s evaluation will be filed in the Section 5310 folder in SharePoint.

The Assistant Transit Planner will review all preliminary proposals submitted on or before the due date for a risk assessment, application completeness, and regional transportation needs. Staff will review all applications. Applications provided by returning applicants will submit their current agreement term, monitoring review findings, and remaining grant balance. This information will be used to determine scaled award amount, new agreement term, and scope of work if awarded.

Grant Agreement Procedures

The Assistant Transit Planner shall submit the agreement template request to the Principal Transit Planner for approval, then route the approved agreement template to the Contract Compliance Specialist when:

- A temporary or awarded FAIN (Federal Award Identification Number) has been assigned in TrAMS to that fiscal year’s allocation,
- Funding recommendations have been approved by the STA Board.

The Assistant Transit Planner will take a screenshot of the System of Award Management (SAM) website to verify current standing. The screenshot will include the organization’s name, EIN number, website address, and date.

1. The Assistant Transit 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).
2. The Assistant Transit Planner will work with awardees to finalize project budgets, project term dates, and the project scope of work that are needed to complete the agreement.
3. The final draft agreement shall be reviewed by the Principal Transit Planner and Contract Specialist before it is transmitted to the subrecipient for final review.
4. Following approval of the draft agreement, the Contract Specialist will then route all agreements for execution.

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.

According to the Section 5310 FRS Reporting Procedures, the Assistant Transit Planner shall enter the project information into the Federal Funding Accountability and Transparency Act Subaward Reporting

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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***. 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.

The Assistant Transit 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, or specific deliverables identified in the project scope of work (SOW).

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, monthly and quarterly reporting, etc. 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.

Reporting

Subrecipients will be required to submit Quarterly Progress Reports (Attachment A) on the 20th day of the month following the end of the quarter. The quarterly progress report due dates will be January 20th, April 20th, and July 20th for the first three quarters of the federal fiscal year. Due to Annual reporting deadlines, the fourth quarter report will be due the second Friday of October, which the Assistant Transit Planner will communicate to subrecipients.

	Quarter 1	Quarter 2	Quarter 3	Quarter 4
Reporting Period	Oct - Dec	Jan - Mar	Apr - Jun	July – Sep
Quarterly Report Due Date	January 20	April 20	July 20	Second Friday
Annual Report Due Date	October 30			

Subrecipient projects who request reimbursements will be required to submit Monthly Beneficiary Data Reports by the 20th day of each month. This will be required to process any reimbursement request.

All subrecipients are required to track and report “unduplicated riders” (unique individuals served) for Section 5310-funded services. The master unduplicated rider roster must be submitted as an attachment to the Q4 (Jul - Sep) quarterly progress report. Subrecipients may use a unique rider ID to submit reports (STA reserves the right to verify all rider ID’s during monitoring reviews). Subrecipient’s volunteer driver logs must adequately record all program specific data. One-way trip verification is subject to review during monitoring review by trip logs or software. The subrecipients procedures and checklists for determining a rider’s Section 5310 eligibility is subject to review during monitoring review.

Volunteers may drive personal or agency vehicles following the subrecipient verifying the following:

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- Volunteer’s background check
- Proof of valid driver’s license
- Vehicle insurance when driving own vehicle OR is covered under the subrecipient’s insurance policy when driving organization vehicles
- Volunteer driver vehicles in good working order.

STA may require additional reporting for projects based on risk level or project performance, which may include supplemental reporting on SOW deliverables and project milestones. STA staff will inform subrecipients of any additional reporting requirement and provide technical assistance needed to meet this requirement. Subrecipients who have difficulty meeting the reporting deadlines may submit a formal request from the project lead on letterhead or in email requesting an adjusted due date. This is subject to approval from STA staff.

Annual reports will be prepared by the Assistant Transit Planner and approved and uploaded to TrAMS by the Principal Transit Planner. Reports will be submitted to FTA by October 30th of each year and will include information required (9070.1G Page VI-5) for all projects under active and temporary FAINs including:

- Annual Program of Projects Status Report
- Federal Financial Reports
- Annual Report (Program Measures)

Invoices

According to the Section 5310 Billing SOP, requests for reimbursement will be directed to the Assistant Transit Planner for eligibility review and internal processing. Reimbursement requests must include appropriate and sufficient documentation to verify that the expenses are both allowable and allocable, including monthly beneficiary data reports. Any questions or concerns should be forwarded to the Assistant Transit Planner for response.

STA Staff will monitor project spending and performance based on the information provided in the Request for Reimbursement (RFR) Workbooks. The Assistant Transit Planner will communicate with subrecipients if there are any discrepancies or follow-up needed to process the reimbursement request.

Monitoring Reviews

A monitoring schedule (Attachment B) shall be prepared and maintained by the Assistant Transit Planner. This monitoring schedule will include monitoring review dates, scope (vehicle records, financial, program performance), review status (open/closed), and contact information for each subrecipient. STA will evaluate each project using the Section 5310 Monitoring Checklist (Attachment C) that includes:

- Title VI Compliance
- Program Management & Reporting
- Financial & Uniform Guidance
- Procurement and Disadvantaged Business Enterprise (DBE)
- Asset and Vehicle Management
- Operations & Service Compliance

Subrecipients with construction projects will also be evaluated using the Section 5310 Construction Monitoring Checklist (Attachment D), if applicable.

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Monitoring reviews shall be conducted annually for all projects. During a monitoring review, projects are subject to re-certification of local match sources, review of in-kind contributions, and verification of volunteer mileage and hours, and unique rider identification (IDs).

A subrecipients risk assessment score is subject to adjustment following a monitoring review. A subrecipient’s risk assessment score may be reclassified to high risk based on program administration and performance. Other factors which may result in a subrecipients risk assessment score being adjust include, but are not limited to, the following:

- Scope of work deliverables
- Failure to submit requested documentation prior to by the established due date, without prior notice
- Late submission of requests for reimbursement monthly beneficiary reports or quarterly progress reports.
- Incomplete submission of requests for reimbursement, monthly beneficiary reports or quarterly progress reports.
- Establishes a pattern of charging nonapplicable or unallowable expenses not directly associated with the project’s scope of work
- Adherence to Title VI requirements

Monitoring review findings shall be sent to subrecipients within the same quarter of review (2 *CFR* 200.329(c)(1)) after the monitoring review. These letters will include the date of the review, scope and any findings or recommendations. The subrecipients will then be given fourteen calendar days to address the findings. Once the subrecipient has addressed all findings, a monitoring review completion letter will be sent. These letters will include the date of the review, confirmation that all findings were addressed or not present, and the closure of the monitoring review. These letters shall be signed by the Assistant Transit Planner and the Principal Transit Planner.

Title VI Compliance

Subrecipients shall submit Title VI Programs at least every three years to STA to assist with compliance efforts. Subrecipients choosing to adopt portions of STA’s Title VI Program are required to follow STA’s update schedule. Every Title VI Plan shall include the following information (C4702.1B p. 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,

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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.

Subrecipient Disclosure Responsibilities

Subrecipients are required to notify STA promptly upon obtaining credible evidence of a covered violation in connection with the STA-funded award (including activities under subawards). The notice to STA must include:

- Who/What/When/Where summary of the matter;
- Award identifiers (STA agreement number and FAIN);
- The timeframe and funds potentially affected;
- Any actions taken to date (e.g., internal hold on payments, segregation of duties, removal of access, initiation of investigation); and
- A contact person for follow-up. (This content satisfies the “in writing” requirement and helps STA meet its Federal notification duties.)

Subrecipients must submit the disclosure in writing to STA (email or letter), with supporting documents. STA will then promptly relay the report to FTA and FTA OIG consistent with 2 CFR 200.113. If applicable (e.g., total active Federal awards exceed the regulatory threshold), STA will ensure information in SAM.gov/FAPIIS regarding specified civil, criminal, or administrative proceedings is current and complete.

Subrecipients are required to cooperate with STA/FTA/OIG inquiries and must preserve or retain records as required by the award and the Uniform Guidance. Non-disclosure or non-cooperation may trigger additional remedies.

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STA Disclosure Responsibilities

It is the responsibility of STA to acknowledge receipt of subrecipient’s written disclosure and log the matter in the subrecipient’s file. Following acknowledgement of the disclosure, and without delay, STA will forward the disclosure and available support to the FTA and the FTA Office of Inspector General consistent with 2 CFR 200.113. (STA may also consult regional FTA counsel/Program Manager, as appropriate.)

STA may consider temporary payment holds, enhanced specific conditions, or other interim controls while facts are assessed. STA will actively coordinate with FTA/OIG as requested to obtain additional information from the subrecipient and ensure Appendix XII reporting obligations (if applicable) are understood.

If a subrecipient fails to disclose or fails to cooperate, STA will apply 2 CFR 200.339 remedies (e.g., withhold payments, disallow costs, suspend/terminate, recommend suspension/debarment, or pursue other legally available remedies) as necessary.

Grant Closeout & Reporting

The Assistant Transit Planner and 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 completing the Section 5310 Project Closeout Checklist (Attachment D) and for preparing the annual Section 5310 reports that are submitted to the FTA by the Principal Transit Planner in TrAMS. The reports may include Program of Projects, Program of Project Status Report, Milestone Progress Report, Federal Financial Report, Project Closeout Checklist, and Closeout Approval Routing Form. STA will initiate award closeout within 90 – 120 days following the completion of all project scope of work activities or after the end of the period of performance.

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. STA will initiate award closeout within 90 – 120 days after all project activities are completed. STA will track project funds and reprogram unused balances to other projects or close out the award if funds cannot be utilized.

Attachments

- Attachment A: Quarterly Progress Report (Sample)
- Attachment B: Monitoring Schedule (Sample)
- Attachment C: Monitoring Checklist (Draft)
- Attachment D: Construction Monitoring Checklist (Draft)
- Attachment E: Project Closeout Checklist (Draft)

Subrecipient	Project	Reporting Period	FAIN #
Enter Organization	Enter Project	Enter Reporting Period	1733-0000-00

Quarterly Service Metrics

Service Metric Descriptions: Enter all service metrics applicable to your project.

Seniors & Individuals with Disabilities: Report the total number of unique individuals served during this reporting period. Each rider should be counted only once as either a senior (age 65+) or an individual with a disability to avoid duplication across the agreement term.

One-Way Passenger Trips (OWPT): Enter the total number of one-way passenger trips provided during this reporting period using Section 5310-funded vehicles and volunteer vehicles, as applicable.

Volunteer Drivers Utilized: Enter the number of volunteer drivers who completed at least one OWPT during this reporting period.

Volunteer Driver Miles: Enter the total number of miles driven by volunteer drivers during this reporting period.

Volunteer Driver Hours: Enter the total number of hours contributed by volunteer drivers during this reporting period.

Volunteer Miles Reimbursed: Enter the total dollar amount reimbursed for volunteer miles during this reporting period.

Service Metric	Month 1	Month 2	Month 3	Total
Individuals with Disabilities				
Senior Individuals Age 65+				
One-Way Passenger Trips				
Volunteer Drivers Utilized				
Volunteer Driver Miles				
Volunteer Driver Hours				
Volunteer Miles Reimbursed				

Scope of Work Deliverables

Transportation Services

OWPT Completed | Planned: 6,000
 Completed between 11/1/25 to current date:
If not on track, explain:

Unduplicated Cancer Patients Served | Planned: 100
 Served between 11/1/25 to current date:
If not on track, explain:

Pause in Scheduled Transportation Activities
 Was there a pause? **Enter [Yes/No]**
If yes, explain:

Program Outreach & Community Engagement

Marketing / Volunteer Recruitment Activities | Planned: 24
 Completed between 11/1/25 to current date:

If not on track, explain why.

Event Summary

Brief summary of events organized or attended:

Rider Feedback

Comments on service quality, accessibility, or unmet needs:

Volunteer Management

Volunteers Recruited | Planned 40

Recruited between 11/1/25 to current date:

If not on track, explain:

Active Volunteers Completing OWPT | Planned 55

Active between 11/1/25 to current date:

If not on track, explain:

Training Orientation and Oversight | Planned: Applicable staff and volunteers.

Describe any staff or volunteer driver training provided:

Progress Narrative

Describe current coordination efforts and activities to identify new transportation resources.

Answer:

Describe service improvements and their impact on the community, seniors and/or citizens with disabilities.

Answer:

Describe any challenges encountered and any significant changes to the project you foresee as a result.

Answer:

Describe any physical improvements: additions or changes to physical infrastructure (e.g., transportation facilities, sidewalks, etc.), technology, and vehicles as applicable.

Answer:

Describe your outreach efforts to Limited English Proficiency (LEP), minority and low-income populations as it relates to this project.

Answer:

Report EEO complaints, Title VI complaints, and ADA complaints. Describe complaint(s), investigation activities, and resolution.

Answer:

For awards over \$100,000, describe lobbying activities conducted during the quarter and if there has been an SF-LLL form submitted in a record of these activities. Please attach documentation to this report. This is applicable to all 5310 projects.

Answer:

Disadvantaged Business Enterprise (DBE) Subcontracts

Are there any active DBE subcontracts under this project? Enter [Yes/No]

If Yes, provide the following:

Contract Term:

Payments Made This Reporting Period:

Project Manager Certification		
Project Manager Name and Title:		
Email and Phone:		
Authorized Signatory:		Date: <i>Enter a date.</i>
<i>Completion of this section certifies the above information is true and accurate to the best of your knowledge.</i>		

DRAFT

Section 5310 Monitoring Schedule

FAIN	Subrecipient	Project	Meeting Type	Agreement #	% Project Funds Remaining	Risk Level	Email Notice Date	Upcoming Monitoring Date	Findings Email	Expected Review Closeout	Type of review
WA-2022-022	SMS	MM	Virtual	2023-10820	50%	High	2/26/2025	3/12/2025	3/21/2025	4/4/2025	Fiscal, Performance, Title VI
1733-2024-02	SMS	SS	Virtual	2024-10929	98%	High	2/26/2025	3/12/2025	3/21/2025	4/4/2025	Fiscal, Performance, Title VI
1733-2024-02	SMS	MT	Virtual	2024-10928	85%	High	2/26/2025	3/12/2025	3/21/2025	4/4/2025	Fiscal, Performance, Title VI
WA-2021-023	SSCC	Vehicle	In Person	2020-10539	N/A	High	2/26/2025	3/13/2025	3/21/2025	4/4/2025	Vehicle, Title VI
WA-2022-022	COAST	COAST	Virtual	2023-10884	55%	High	3/26/2025	4/9/2025	4/23/2025	5/7/2025	Fiscal, Performance, Title VI
WA-2024-035	SNAP	SNAP	Virtual	2023-10816	45%	High	3/26/2025	4/9/2025	4/23/2025	5/7/2025	Fiscal, Performance, Title VI
WA-2022-022	COAST	COAST	In Person	2023-10885	N/A	Low	3/26/2025	4/10/2025	4/17/2025	5/1/2025	Vehicle, Title VI
1733-2024-02	CC	CC	In Person	2024-10934	N/A	Moderate	4/30/2025	5/7/2025	5/21/2025	6/4/2025	Fiscal, Performance, Title VI
1733-2024-02	Project id	Vehicle	In Person	2024-10931	N/A	Moderate	4/30/2025	5/8/2025	5/21/2025	6/4/2025	Vehicle, Title VI

SAMPLE

Subrecipient:
 STA Reviewers:
 Meeting Type:

Review Date:

Project	Agreement #	Term	FAIN #
Enter Project (CAP)		Enter Date. – Enter Date.	Enter Project
Enter Project (OP)		Enter Date. – Enter Date.	Enter Project
Organization Address:			

Project Contacts	Title	Email

Section 1 Title VI (Civil Rights, ADA LEP)

1. Is the subrecipient’s Title VI program current, Board-approved, and fully implemented per FTA requirements (Including required notices, language access/Safe Harbor and website posting)?

- STA Adopted Plan:
- Board Approved:
- Safe Harbor Languages:
- Public Notice (online):
- Public Notice (front desk/lobby):
- Public Notice (5310 vehicles):

Response:

2. Is the Title VI complaint procedure and complaint form available to the public (e.g., online, in office, and all 5310 vehicles) and translated in all designated safe harbor languages?

- Procedure & Form (online):
- Procedure & Form (front desk/lobby):
- Procedure & Form (5310 vehicles):
- Available in Safe Harbor Languages

Response:

3. Provide any Title VI investigations, complaints, or lawsuits since the last submission and status/resolution.

Response:

4. Does your approved Title VI Plan use the latest census or American Community Survey (ACS) data to analyze service-area minority, LEP, and income characteristics?

Response:

5. Do you have a Public Participation Plan (PPP) that documents public involvement methods and outcomes?

Response:

6. Does the PPP include targeted outreach to minority and Limited English Proficiency (LEP) populations, and is there a documented outreach summary since the last Title VI submission?

Response:

7. Do you have an LEP Plan based on the four-factor analysis, with translation/interpretation methods and staff training?

Response:

8. Do you have a process to encourage minority participation on non-elected transit boards/committees?

Response:

9. If planning a new facility, have you prepared or scheduled the Title VI equity analysis? *(If applicable)*

Response:

10. Describe how language assistance is provided under your Language Assistance Plan (LAP), indicate frequency of use during the review period, and confirm whether it is reported in quarterly reports.

Response:

11. How is the LAP used to train employees to provide timely and reasonable language assistance?

Response:

Section 2 Program Management and Reporting

1. Provide the following current documentation *(as applicable)*:

- Suspension and Debarment
- Lobbying Disclosure
- Disadvantaged Business Enterprise (DBE)
- System of Award Management Registration

Response:

2. Were all quarterly performance reports submitted on time?

Response:

3. Do all reports document progress of the project scope, schedule, and performance measures?

Response:

4. Have there been project staffing changes since the agreement was executed (e.g., roles, FTE, or new personnel)?

Response:

5. Provide upcoming community outreach activities relevant to 5310 eligible populations?

Response:

6. Provide a plan to sustain the project beyond the current agreement term.

Response:

7. Identify any technical assistance needed from the pass-through entity.

Response:

Section 3 Financial & Uniform Guidance

1. Has the source of local match changed? *(If yes, a local match certification form will need to be executed)*

Response:

2. Did the organization meet the Single Audit threshold in the applicable fiscal year *(note current \$1,000,000 threshold for fiscal years beginning on/after 10/1/2024)*? If yes, provide the latest audit and any findings with corrective actions/responsible staff.

Response:

3. How are your financial systems and internal controls documented? Provide manuals and process maps.

Response:

4. Is your travel policy aligned with the 2 CFR Travel costs regulation?

Response:

5. Do you maintain a sperate chart of accounts and accounting manuals that defines obligation criteria?

Response:

6. Are all charges supported by source documentation *(e.g., invoices, receipts, timesheets)*?

Response:

7. Are sources of non-federal funds identified and tracked separately in the accounting system?

Response:

8. Were all requests for reimbursement submitted on time, with all appropriate backup documentation (e.g., signed, monthly and quarterly reports, time distribution table, and receipts)?

Response:

9. Describe the collection, review, signature, and submission steps for reimbursement steps for reimbursement request.

Response:

10. Do your policies meet the 2 CFR record retention requirements (e.g., 3 years with extensions for litigation and audit holds per 200.334(a))?

Response:

11. Will the project generate program income? If yes, explain how it will be tracked and allocated.

Response:

12. Does the subrecipient have written policy and procedures to adequately administer federal grant programs?

Accounting Policy/ Cash Management (200.302)

Internal Controls (200.303)

Procurement (200.218)

Compensation (200.430)

Equipment and Inventory Records (200.313)

Conflict of Interest (200.112)

Response:

13. How does project staff track and verify volunteer driver mileage?

Response:

Section 4 Procurement and Disadvantaged Business Enterprise

1. Do your procurement policies meet the 2 CFR procurement requirements (e.g., full and open competition, Independent Cost Estimate, and cost price analysis)?

Full and open competition

Independent Cost Estimate

Cost price analysis

Loss, damage, and theft prevention policy

Response:

2. Do your procurement procedures align with FTA's Third-Party Contracting Guidance?

Response:

3. Do one or more of your operating projects have an active DBE subcontract? If yes, answer the following elements:

- DBE Teir I or Teir II status determined
- All required elements implemented
- Policy statement
- Contract Assurances
- Small business element
- Reporting
- Transit vehicle procurement reporting
- List of bidders (*Owners, NAICS, primes and subs*)

Response:

Section 5 Asset and Vehicle Management (Capital)

1. Provide vehicle pre-trip inspection checklist, preventative maintenance schedules, work orders, warranty claims and lift and ramp inspection records; confirm preventative maintenance intervals are met.

Response:

2. Confirm adherence to useful life expectations and disposition procedures, including proceeds handling.

Response:

3. Provide all registration and insurance requirements. (e.g., *auto liability and general liability insurance*).

- Auto Liability
- Current Vehicle Registration
- General Insurance
- Volunteer coverage (drivers using company vehicles)

Response:

4. For rolling stock purchases, provide pre-award, post-delivery audit files and Buy America certifications.

Response:

5. Verified vehicle status

- Vehicle mileage at time of review
- Useful service life remaining
- Vehicle cleanliness
- ADA lift/ramps/securements
- Collisions
- Repairs needed or pending
- Interior/exterior lighting

- Chassis/frame (*inspect for leaks/damage*)
- Electrical (*where applicable, including battery*)
- Start Engine (*inspect for unusual noises or smells*)
- Run HVAC (*inspect heater, AC, and fan*)
- Safety Kit (*inspect first aid kit, fire extinguisher*)

Response:

6. Is the vehicle used for incidental use such as benefitting individuals that are not seniors or individuals with disabilities, if so, how do you ensure that it doesn't interfere with service provided to seniors and individuals with disabilities?

Response:

Section 6 Operations & Service Compliance (Operating)

1. If operating demand-responsive service, demonstrate equivalent service (*e.g., response time, fares, service area, hours/days, information/reservations, no capacity constraints, no trip-purpose restrictions*).

Response:

2. Provide ADA policy/practices on reasonable modification, service animals, securement assistance and staff training.

Response:

3. If your project charged volunteer miles or hours in the review period, provide the volunteer training documents used.

Response:

Reviewer Signature:

[STA Staff Name], [Title]

Date

SECTION 5310 CONSTRUCTION MONITORING CHECKLIST

A subrecipient is a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal award. As the pass-through entity (Spokane Transit) is ultimately responsible for the subrecipient's performance and compliance with federal and state regulations and requirements.

Name of Subrecipient (Agency):

Project Contact(s):

Phone/Email:

Address:

Project Name:

FAIN or Grant #:

STA Contract #:

Reviewer(s):

In person or Virtual:

Date of Monitoring Review:

CONSTRUCTION MONITOI RNG CHECKLIST	YES	NO	N/A
Was NEPA satisfied?			
Comments:			
Did STA review RFP/IFB?			
Comments:			
Did subrecipient provide STA with bid table?			
Comments:			
Did Subrecipient provide Prime Contractor/Subcontractor names - see table below			
Comments:			
Did Subrecipient have prime and subcontractor sign applicable certifications – see table below			
Comments:			
Reviewed documentation that subrecipient confirmed contractor/subcontractor are licensed in the State of Washington			
Comments:			
Reviewed documentation that subrecipient confirmed the contractor/subcontractor are in good standing and current with the Department of Revenue			
Comments:			
Reviewed documentation that subrecipient confirmed that the contractor/subcontractor have Workers Compensation coverage			
Comments:			
Reviewed documentation that subrecipient confirmed contractor/subcontractor are not debarred in State of Washington and with federal government (SAM)			
Comments:			

Subrecipient identifies and reports any DBE contractors & includes DBE provision in contract(s) (FTA C 4220.1F Appendix D-4)			
Comments:			
Reviewed contract provisions of the subrecipient, prime and all subcontractors to verify federal language requirements for Civil Rights (Title VI, ADA, EEO) & (Special DOL EEO Clause if >10,000 Appendix D-4 FTA C 4220.1F)			
Comments:			
Reviewed that Subrecipient verified state and federal wages rates based on bid date.			
Comments:			
Reviewed that the contractor has filed the Intent to Pay Prevailing Wage/Davis Bacon (49 U.S.C. 5333(a)) and verifies which wages (state or federal) is higher			
Comments:			
Subrecipient reviewed and verified wages for employees by job classification on weekly certified payrolls for all contractors performing work.			
Comments:			
Subrecipient, upon application of payment, verified complete certified payroll records for all contractors who have performed work for that period.			
Comments:			
Reviewed that Subrecipient ensured that the Prime Contractor follows "Prompt Pay Provisions". Verification of prompt pay is done by random selection. Emphasis will be placed on DBE subcontractors to ensure that "Prompt Pay Provisions" are followed.			
Comments:			
Reviewed that subrecipient reviewed and verified accurate Affidavit of Wages Paid.			
Comments:			
Reviewed that documentation was received in order to pay retainage. Subrecipient may allow Prime to have a retainage bond.			
Comments:			
Review construction documents to ensure ADA requirements are met.			
Comments:			
Review selected construction documents to verify Buy America compliance (if contract is over \$150,000 FTA C 4220.1F Appendix D-4)			
Comments:			
Conduct Site visits to verify plans meet specifications.			
Comments:			
Subrecipient notifies STA of sent notice of completion DOR, LNI, & ESD			
Comments:			

Bid Opening Date:				
Prime Contractor	Subcontractor	Discipline	Contract Amount	DBE (Yes/No)

Signed Certificates					
Name	Prime or Subcontractor	Suspension & Debarment	Lobbying	DBE	Buy America

Signature (STA Staff): _____

Date: _____

Supervisor Approved: _____

Date: _____

SECTION 5310 PROJECT CLOSEOUT CHECKLIST

A subrecipient receives Section 5310 funding from the designated recipient, Spokane Transit. Spokane Transit is ultimately responsible for the subrecipient's performance and compliance with federal and state regulations and requirements.

Name of Subrecipient (Agency):

Project Contacts:

Phone/Email:

Address:

Project Name:

FAIN or Grant #:

STA Contract #:

Reviewer(s):

Date of Monitoring Review:

SUBRECIPIENT AGREEMENT INFORMATION

Award Date:

Award Type:

STA Board Award Date:

Agreement Execution Date:

Comments:

SUBRECIPIENT INVOICE INFORMATION (Invoice information to be completed at end of project.)

INVOICE DATE	INVOICE #	INVOICE AMOUNT	STA REIMBURSEMENT DATE	COMMENTS
<i>Total 5310 Amount</i>				

SUBRECIPIENT PROJECT CLOSEOUT CHECKLIST	YES	NO	N/A
Does the agreement have federal clauses?			
<i>Comments:</i>			
Did the subrecipient provide a DUNS/UEI #, CAGE, etc.?			
<i>Comments:</i>			
Audited subrecipient was not debarred (SAM)?			
<i>Comments:</i>			
Reviewed Risk Assessment?			
<i>Comments:</i>			
Report subaward in FSRs (STA Responsible)?			
<i>Comments:</i>			



SUBRECIPIENT PROJECT CLOSEOUT CHECKLIST	YES	NO	N/A
Reviewed subrecipient has adequate local match?			
<i>Comments:</i>			
Reviewed subrecipient has technical capacity?			
<i>Comments:</i>			
Subrecipient signed Suspension & Debarment Certification?			
<i>Comments:</i>			
Subrecipient signed Lobbying Certification?			
<i>Comments:</i>			
Subrecipient signed DBE Certification?			
<i>Comments:</i>			
Subrecipient signed Buy America Certification (if applicable)?			
<i>Comments:</i>			
If Construction Contract Complete Construction Checklist?			
<i>Comments:</i>			
If subrecipient contracting with DBE complete DBE Checklist?			
<i>Comments:</i>			
Audit subrecipient's Title VI program using Title VI Checklist?			
<i>Comments:</i>			
Does subrecipient use indirect costs? De minimis or cost allocation plan/proposal?			
<i>Comments:</i>			
Did subrecipient expend over \$750,000 in federal funds? If so, then Subrecipient must have independent audit report – for verification.			
<i>Comments: Subrecipient does not meet the threshold for this requirement.</i>			
Is an EEO program or abbreviated EEO plan required? (FTA C 4704.1A page 1-3)			
<i>Comments:</i>			
Were Quarterly reports submitted on-time?			
<i>Comments:</i>			
Were reimbursement requests accurate with adequate supporting documentation?			
<i>Comments:</i>			
Date project is complete?			
<i>Comments:</i>			
Date of site visit(s)/desk reviews?			
<i>Comments:</i>			

Signature (STA Staff): _____
 [Name, Title]

Date: _____

Supervisor Approved: _____
 [Name, Title]

Date: _____

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Spokane Transit Authority: Section 5310 Program

Subrecipient Billing Standard Operating Procedures (SOP)

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 5010.1F – 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 expenses for eligibility, processing requests for reimbursement, 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 approves reimbursement requests, and provides training and support to the Assistant Transit Planner.
- Director of Planning and Development: reviews and approves 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. To ensure timely spend down of grant funding, reimbursements shall be requested monthly after expenses have been incurred and submitted no later than 20 days into the following month, *unless prior written approval is provided by Spokane Transit Authority*.
2. Requests for reimbursement shall be submitted using the workbook provided to the subrecipient by Spokane Transit Authority (see Billing Documentation Section below for details).
3. Requests for reimbursement will include actual amounts posted to the subrecipient’s general ledger as the primary source for all invoice amounts.

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4. Requests for reimbursement shall clearly delineate the amount (and source) of all matching funds.
5. Subrecipient invoice emails, and invoice packets must be submitted with the following formatted naming style, 'Project Name_Month_Year_Invoice'
6. Subrecipient reimbursement requests and all supporting documentation must be submitted as one combined invoice in PDF format

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

Invoice Packet Submission

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:

1. Review the executed agreement and the project budget narrative for costs that are eligible for reimbursement.
 - a. Any modifications to a grant award that does not change the overall award may be requested and approved by STA.
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, penalties, lobbying, etc.
 - b. Any costs requiring advance approval from the FTA in order to be allowable in accordance with §200.407.

Criteria for Allowability

It is the policy of STA to only reimburse expenses that have been determined to be allowable per executed

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agreements and 2 CFR Part 200 Subpart E – Cost Principles, General Provisions for Selected Items of Cost §200.420 - §200.476. 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 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. Verify there is no consistent overspending between actual and budgeted expenditures (greater than 10% within two concurrent months).
 - a. If found to be consistently overspending the Assistant Transit Planner will request the subrecipient to address and resolve the pattern. Once a productive resolution is found the Assistant Transit Planner file a memo summarizing the issue addressed and the agreed upon resolution, to be references at a later monitoring review.
8. Verify that the billing is reconciled and then entered in the Section 5310 Project Billing Ledger.
9. Prepare a billing packet that shall include:
 - a. Approval Routing Form (Attachment A)
 - b. Subrecipient Signed Request for Reimbursement (RFR) Workbook (Attachment B)
 - c. Section 5310 Project Billing Ledger (Attachment C)
 - d. Backup documentation for all allowable expenses
 - e. Monthly Beneficiary Data Report (Attachment D)
 - i. Include Verifications which shall include:
 - f. Received Date Stamp
 - g. Certification Stamp (with Assistant Transit Planner Initials and Date)
 - h. Email correspondence between STA and subrecipient documenting invoice discrepancies and their resolution (if applicable)
10. Combine the Approval Routing Form, RFR, backup documentation, and billing ledger.
11. The Assistant Transit Planner will sign and enter the billing packet into Tyler Munis for approval.

Billing Documentation

Requests for reimbursement (RFR) workbooks shall be signed by an authorized official of the subrecipient organization using the 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 RFR Workbook that are not within 10% of the month's variance. When reimbursing subrecipient invoices, it is STA’s goal to mirror the federal prompt pay guidelines applicable to contractors and subcontractors 2 CFR 200.305(b)(3) provided the invoice is “found to be proper”. The subrecipient will be notified within five working days of invoice submission regarding any missing backup documentation or discrepancies found during invoice review.

The invoice is due no later than 20 days following the month the expense was incurred Invoices shall be submitted electronically to Section5310@spokanetransit.com and will include:

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Email and File Naming Structure - Reimbursement request and all legible supporting documentation consolidated into one PDF and named using this structure: ProjectName_Month_Year_Invoice

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 benefiting 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 and hours driven, and unique participant identifier shall be submitted with each request for reimbursement. Subrecipient’s volunteer driver logs must adequately record all program specific data. Subrecipients without adequate volunteer driver logs may be requested to adopt STA’s Section 5310 Volunteer Mileage Log (Attachment F) for the term of the agreement.

1. Mileage will be reimbursed at the applicable Internal Revenue Service (IRS) rate, typically updated in January each year.
2. All submitted volunteer driver logs must have all trips reviewed for eligibility and signed by an authorized staff member certifying the review and allowability.
3. All handwritten volunteer driver logs must be legible enough to be read when scanned in as a PDF.
4. Incomplete volunteer driver logs will not be accepted.

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.

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

Local Match 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:

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

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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 the national volunteer hourly average rates paid for similar work in the United States labor market. Subrecipient match must be proportional to expenses at each reimbursement request. Subrecipients may not front-load match or claim in-kind at a higher rate than expenses allow. The Federal share of monthly expenses is limited to the *lesser* of match or expenses.

Reimbursement for contributed volunteer expenses (e.g., mileage, hours) shall be documented in a manner acceptable to STA. Volunteers may drive personal or agency vehicles following the subrecipient verifying the following:

- Volunteer’s background check
- Proof of valid driver’s license
- Vehicle insurance when driving own vehicle OR is covered under the subrecipient’s insurance policy when driving organization vehicles

In-kind volunteer driver match must include documentation of hours, mileage, rates, and calculations in each volunteer driver log. Subrecipients using staff or volunteer travel logs will be required to adopt STA’s Section 5310 Volunteer Mileage Log if STA determines the subrecipient’s travel log’s do not meet all applicable tracking criteria or detail.

To prevent double-charging in-kind costs to multiple federal awards. Subrecipients must declare all grants associated with the Section 5310 funded operating project and identify match rates, and source of local match. All materials are subject to STA verification at the time a monitoring review is conducted.

Subrecipient Invoice Processing & Notices

Requests for reimbursement will be directed to the Assistant Transit Planner for eligibility review and internal processing. Once discrepancies have been addressed, and approved by STA, said invoices shall be paid by STA within thirty (30) days. Invoices will be tracked (date of submittal, payment, notices, etc.) in the Section 5310 Invoice Tracking Sheet (Attachment E) by Fiscal Year, Subrecipient/project, and STA Grant Agreement.

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

Attachments

Attachment A: Spokane Transit Approval Routing Form (Draft)

Attachment B: Request for Reimbursement (Sample)

Attachment C: Billing Ledger (Sample)

Attachment D: Monthly Beneficiary Data Report (Draft)

Attachment E: Section 5310 Invoice Tracking Sheet (Sample)

Attachment F: Volunteer Mileage Log (Draft)

Submitting Department:

Date:

Contact Person:

STA Agreement:

Contract Information		
Project Name & Type:		
Contract Term:		
Federal Award ID:		
Federal Match:		
STA (Other) Match:		
Subrecipient Match:		
Indirect Cost Rate:		
Reviewer Initials & Date		

Invoice Background	Yes	No	N/A
Allowable Costs			
Approved Line Items			
Monthly Beneficiary Report			
Budget Fluctuations			
Backup Documentation			
Project Billing Ledger			
Credits Included			
Reviewer Initials & Date			

SUMMARY:

[Project background and summary.]

Attached is the [Agency Name] reimbursement request for [Month, Year]. The invoice has been reviewed and is eligible for reimbursement.

Total Invoiced Monthly Expense: [\$Amount]

Request Action: Reimburse Cancer Can't in the amount of [\$Amount]

Reviewer Signature:

[Name], [Title]

Date

Subrecipient Name

Agreement #	Vendor
2025-00000	0

Month:		10% Variance
4/26	Feb-26	79.62%

Line Item	Budget	Prior Expenses	Month	Exp. to Date	Grant Balance	% Remaining
Salaries						
Position	\$ 35,468	\$ 3,555.60	\$ 972.00	\$ 4,527.60	\$ 30,940.82	87%
Position	\$ 98,882	\$ 5,486.00	\$ 1,767.00	\$ 7,253.00	\$ 91,628.66	93%
Position	\$ 51,590	\$ 1,751.00	\$ 568.75	\$ 2,319.75	\$ 49,270.68	96%
Subtotal	\$ 185,941	\$ 10,792.60	\$ 3,307.75	\$ 14,100.35	\$ 171,840.16	92%
Fringe						
Position	\$ 3,792	\$ 273.07	\$ 78.59	\$ 351.66	\$ 3,439.91	91%
Position	\$ 10,570	\$ 421.32	\$ 146.38	\$ 567.70	\$ 10,002.75	95%
Position	\$ 5,515	\$ 134.48	\$ 46.68	\$ 181.16	\$ 5,333.86	97%
Subtotal	\$ 19,877	\$ 828.87	\$ 271.65	\$ 1,100.52	\$ 18,776.52	94%
Vol Driver						
Vol Mileage	\$ 33,153	\$ 2,999.84	\$ 1,124.95	\$ 4,124.79	\$ 29,028.17	88%
Subtotal	\$ 33,153	\$ 2,999.84	\$ 1,124.95	\$ 4,124.79	\$ 29,028.17	88%
Supplies						
Vo. Supplies	\$ 454	\$ 3.82		\$ 3.82	\$ 450.58	99%
Office Supplies	\$ 550	\$ 98.62	\$ 83.51	\$ 182.13	\$ 367.87	67%
Printer Ink	\$ 400	\$ 11.97	\$ 43.02	\$ 54.99	\$ 345.01	86%
Subtotal	\$ 1,404	\$ 114.41	\$ 126.53	\$ 240.94	\$ 1,163.46	83%
Other Costs						
Background Chk.	\$ 900	\$ 569.68	\$ 197.15	\$ 766.83	\$ 133.17	15%
Cell Phone	\$ 1,080	\$ 169.67	\$ 56.53	\$ 226.20	\$ 853.80	79%
Subscriptions	\$ 2,675	\$ 1,278.07	\$ 62.00	\$ 1,340.07	\$ 1,334.93	50%
Insurance	\$ 9,201	\$ 1,134.24	\$ 275.22	\$ 1,409.46	\$ 7,791.54	85%
Advertising	\$ 1,440			\$ -	\$ 1,440.00	100%
Subtotal	\$ 15,296	\$ 3,151.66	\$ 590.90	\$ 3,742.56	\$ 11,553.44	76%
IDCR						
10% De-Minimis	\$ 25,567	\$ 1,788.74	\$ 542.18	\$ 2,330.92	\$ 23,236.17	91%
Subtotal	\$ 25,567	\$ 1,788.74	\$ 542.18	\$ 2,330.92	\$ 23,236.17	91%
MTDC+De-Min						
Subtotal	\$ 281,238	\$ 19,676.12	\$ 5,963.96	\$ 25,640.08	\$ 255,597.92	91%
In-Kind Match						
Vol Driver Hrs	\$ 49,630	\$ 3,472.24	\$ 1,052.46	\$ 4,524.70	\$ 45,105.30	91%
Subtotal	\$ 49,630	\$ 3,472.24	\$ 1,052.46	\$ 4,524.70	\$ 45,105.30	91%
Total	\$ 330,868	\$ 23,148.36	\$ 7,016.42	\$ 30,164.77	\$ 300,703.23	91%
Reimbursable	\$ 281,238	\$ 19,676.12	\$ 5,963.96	\$ 25,640.08	\$ 255,597.92	91%

Invoiced Monthly Expenses:	\$ 7,016.42	100%
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Feb 2026 Reimbursable:	\$ 5,963.96	85%
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Name, Title Date

Fed:	\$ 3,508.21	50%
STA:	\$ 2,455.75	35%
CC:	\$ 1,052.46	15%
0000-000-0		
0		

"By signing this report, I certify to the best of my knowledge and belief that the information provided herein is true, complete, and accurate. I am aware that the provision of false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil, or administrative consequences including, but not limited to violations of U.S. Code Title 18, Sections 2, 1001, 1343 and Title 31, Sections 3729-3730 and 3801-3812."

[Subrecipient Name] Billing Ledger 0000-0000-0

RFR Received		Contract Expenses		Fed Match		STA Match		[Subrecipient] Match		Reimburse		Invoice #	
		100%	\$	50%	\$	35%	\$	15%	\$	85%	\$		
FY24	Q4			\$ -		\$ -		\$ -		\$ -		10.25	
		12/12/25	\$	9,149.43	\$	4,574.72	\$	3,202.31	\$	1,372.41	\$	7,777.02	11.25
		1/9/26	\$	6,701.47	\$	3,350.73	\$	2,345.52	\$	1,005.22	\$	5,696.25	12.25
FY25	Q1	2/12/26	\$	7,297.46	\$	3,648.73	\$	2,554.12	\$	1,094.61	\$	6,202.85	1.26
		3/4/26	\$	7,016.42	\$	3,508.21	\$	2,455.75	\$	1,052.46	\$	5,963.96	2.26
			\$	-	\$	-	\$	-	\$	-	\$	-	3.26
	Q2		\$	-	\$	-	\$	-	\$	-	\$	-	4.26
			\$	-	\$	-	\$	-	\$	-	\$	-	5.26
			\$	-	\$	-	\$	-	\$	-	\$	-	6.26
			\$	-	\$	-	\$	-	\$	-	\$	-	7.26
			\$	-	\$	-	\$	-	\$	-	\$	-	8.26
			\$	-	\$	-	\$	-	\$	-	\$	-	9.26
	Q4		\$	-	\$	-	\$	-	\$	-	\$	-	10.26
			\$	-	\$	-	\$	-	\$	-	\$	-	11.26
			\$	-	\$	-	\$	-	\$	-	\$	-	12.26
FY26	Q1		\$	-	\$	-	\$	-	\$	-	\$	-	1.27
			\$	-	\$	-	\$	-	\$	-	\$	-	2.27
			\$	-	\$	-	\$	-	\$	-	\$	-	3.27
Total Expenses:		9%	\$ 30,164.77	5%	\$ 15,082.39	3%	\$ 10,557.69	1%	\$ 4,524.70	9%	\$ 25,640.08	3	
Remaining Balance:		91%	\$300,703.23	45%	\$ 150,351.61	32%	\$ 105,246.31	14%	\$ 45,105.30	77%	\$ 255,597.92	23	
Comments									Budget vs. Actual Report				
>No DBE subcontracts are associated with this project. >Project start date 11.25.									Monthly Expenses		Budgeted	Actual	
									Average		\$ 12,725.69	\$ 10,054.92	
									Remaining		24	29.91	
									Tyler Munis Reconciled: 2/5/26				

Subrecipient	Project	Reporting Period	FAIN #
		<i>Enter Reporting Period</i>	0000-0000-0

Monthly Service Metrics

Service Metric Descriptions: Enter all service metrics applicable to your project.

Seniors & Individuals with Disabilities: Report the total number of unique individuals served during this reporting period. Each rider should be counted only once as either a senior (age 65+) or an individual with a disability to avoid duplication across the agreement term.

One-Way Passenger Trips (OWPT): Enter the total number of one-way passenger trips provided during this reporting period using Section 5310-funded vehicles and volunteer vehicles, as applicable.

Volunteer Drivers Utilized: Enter the number of volunteer drivers who completed at least one OWPT during this reporting period.

Volunteer Driver Miles: Enter the total number of miles driven by volunteer drivers during this reporting period.

Volunteer Driver Hours: Enter the total number of hours contributed by volunteer drivers during this reporting period.

Volunteer Miles Reimbursed: Enter the total dollar amount reimbursed for volunteer miles during this reporting period.

Service Metric	Month 1	Month 2	Month 3	Total
Individuals with Disabilities				
Senior Individuals Age 65+				
One-Way Passenger Trips				
Volunteer Drivers Utilized				
Volunteer Driver Miles				
Volunteer Driver Hours				
Volunteer Miles Reimbursed				

Scope of Work Deliverables

Transportation Services

OWPT Completed | Planned: 6,000

Completed between 11/1/25 to current date:

If not on track, explain:

Unduplicated Cancer Patients Served | Planned: 100

Served between 11/1/25 to current date:

If not on track, explain:

Pause in Scheduled Transportation Activities

Was there a pause? **Enter [Yes/No]**

If yes, explain:

Program Outreach & Community Engagement

Marketing / Volunteer Recruitment Activities | Planned: 24

Completed between 11/1/25 to current date:

If not on track, explain why.

Event Summary

Brief summary of events organized or attended:

Rider Feedback

Comments on service quality, accessibility, or unmet needs:

Volunteer Management

Volunteers Recruited | Planned 40

Recruited between 11/1/25 to current date:

If not on track, explain:

Active Volunteers Completing OWPT | Planned 55

Active between 11/1/25 to current date:

If not on track, explain:

Training Orientation and Oversight | Planned: Applicable staff and volunteers.

Describe any staff or volunteer driver training provided:

Disadvantaged Business Enterprise (DBE) Subcontracts

Are there any active DBE subcontracts under this project? Enter [Yes/No]

If Yes, provide the following:

Contract Term:

Payments Made This Reporting Period:

Project Manager Certification

Project Manager Name and Title:		
Email and Phone:		
Authorized Signatory:		Date: <i>Enter a date.</i>
<i>Completion of this section certifies the above information is true and accurate to the best of your knowledge.</i>		

FY22 (October 1, 2022 - 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
Agency Name	Project Name	Agreement Number	1/10/2019									12/1/2021
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

WA-2021-023

AGENCY	PROJECT	STA AGREEMENT #	CONTRACT START DATE									CONTRACT END 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
Agency Name	Project Name	Agreement Number	12/1/2020									12/31/2022
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

WA-2021-029

AGENCY	PROJECT	STA AGREEMENT #	CONTRACT START DATE									CONTRACT END 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

Subrecipient Name:					Program:				
Volunteer Driver Name:			Home:		Month & Year:				
Date	Starting Location	Stop 1 Address	Stop 2 Address	Stop 3 Address	Ending Location	Total Mileage	Total Time		
						\$	-	\$	-

1. Round Total Time to nearest quarter hour; enter minutes as .25, .50, .75 or .00.
2. By signing I certify that I currently have liability insurance on myself and on the vehicle for which I am claiming mileage reimbursement.

Volunteer Signature: _____ DATE: _____

Supervisor Signature: _____ DATE: _____

Reimbursement/In-Kind Valuation		
Miles	Rate	Total Payment
0.00	\$ 0.725	\$ -
Hours	Rate	Total Payment
0.00	\$ 34.79	\$ -

DRAFT

Revision #:	2
Implementation Date:	4/15/2021
Last Revision Date:	6/2/2026

Spokane Transit Authority: Section 5310 Program

Subrecipient Subaward Reporting Standard Operating Procedures (SOP)

Purpose

In accordance with FTA Circular 5010.1F, Chapter III, Section 3.g, the purpose of these procedures is to ensure that Federal Funding Accountability and Transparency Act (FFATA) Subaward reports are submitted for awardees with awards greater than or equal to \$30,000, in a timely manner. Specifically, these procedures shall apply to the submission of subaward reports submitted by STA on behalf of the 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 procedures outlined in this document (Agreement Execution, Execution Notification, Documentation of Agreement Execution and Award Amount for Subrecipients, Draft Report, Approval, Submittal, Report Documentation, etc.).

Prerequisites

- S.2590 – Federal Funding Accountability and Transparency Act (FFATA) of 2006
- FTA C Circular 5010.1F – FFATA Subaward and Executive Compensations Reporting
- 2 CFR Part 200 – (Specifically, Subpart D—Post Federal Award Requirements)
- Spokane Transit Section 5310 Program Management Plan, as amended

Responsibilities

- Assistant Transit Planner: will use this document as a guide to conduct reporting activities to include subaward reporting for subrecipient awards, record retention, and other duties as assigned.
- Principal Transit Planner: will keep this SOP up-to-date and current for use, review and approve subaward reports before submittal, and provide training and support to the Assistant Transit Planner.
- Contracts Compliance Specialist: will draft subrecipient agreements and process for execution.

Subaward Reporting Procedures

The following policies shall apply to the preparation and submission of subaward reports for Section 5310 subrecipients:

1. Contract Compliance Specialist will work with subrecipients to execute an agreement.
2. A notice will automatically be sent out to the Assistant and Principal Transit Planners via DocuSign immediately after the agreement has been executed.
3. Assistant Transit Planner will document the date of agreement execution.
4. Assistant Transit Planner will verify subrecipients with 5310 awards greater or equal to \$30,000.
5. Assistant Transit Planner will prepare a subaward report submittal and send to Principal Transit Planner for review and approval.

Revision #:	2
Implementation Date:	4/15/2021
Last Revision Date:	6/2/2026

- With approval, Assistant Transit Planner will submit the report by the last day of the following month of agreement execution on the online reporting system in the [SAM.gov website](http://www.sam.gov). (www.sam.gov)

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

The required data elements in the subaward are:

- Name of entity receiving subaward
- Amount of subaward
- Location of entity receiving subaward
- Primary location of performance
 - City, state, congressional district

FTA also requires each subrecipient under the award to report the names and total compensation of each of the subrecipient's five most highly compensated executives for the subrecipient's preceding completed fiscal year, if the subrecipient meets these criteria:

- Received 80 percent or more of their annual gross revenues in Federal awards
- Received \$25,000,000 or more in annual gross revenues from Federal awards
- The public does not have access to this information about the compensation of the executives through periodic reports filed under Section 13(a) or 15(d) of the Securities Exchange Act of 1934, 15 U.S.C. 78m(a) or 78o(d), or Section 6104 of the Internal Revenue Code of 1986.

Reports must be submitted no later than the month following the month in which this Federal award is made, and annually after that.

Subaward Reporting Documentation

The Assistant Transit Planner will maintain record of subaward reports submitted in subrecipient project files. A record of the grant year, subrecipients, their reporting status, agreement execution date, subaward reporting deadline, and report submittal date will be logged into the "5310 Subaward Report Tracking Sheet" maintained by the Assistant Transit Planner.

Subrecipient Subaward Reporting Process & Notices

Subrecipient subaward reporting shall be completed in a timely manner. subaward reports must be submitted by the end of the month following the month in which STA awards any subaward or obligation greater than or equal to \$30,000 and NOT the month after FTA awarded the funds to STA. Obligation of subawards occur when an agreement is executed by the subrecipient and STA.

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

Attachments

Attachment A: Subaward Reporting Tracking Sheet (Sample)

Section 5310 Subaward Report Tracking Sheet

FAIN	Subrecipient	Contract #	Grant Year	Project	Project Type	Description	Award Amount	Subaward Report Needed? (Y/N)	Agreement Executed (Date)	Subaward Reporting Deadline (Date)	Actual Submittal (Date)	Filed for each project? (Y/N)
WA-2018-067	COAST Transportation	2018-10257.1	2017-2018	Vehicle Purchase	Capital	Agreement Term Extension- Useful Service Life	\$ 40,000	Y	7/13/2021	8/30/2021	7/28/2021	Y
	COAST Transportation	2018-10215.1	2017-2018	Demand Response	Operating	Agreement Term Extension	\$ 77,000	Y	11/17/2021	12/31/2021	11/30/2021	Y
	COAST Transportation	2018-10215.2	2017-2018	Demand Response	Operating	STA local funds added, term extended	\$ 77,000	Y	5/20/2022	6/20/2022	1/10/2023	Y
	Spokane Neighborhood Action Partners	2018-10217	2017-2018	Vehicle Purchase	Capital	Agreement Term Extension- Useful Service Life	\$ 40,000	Y	10/19/2021	11/30/2021	11/30/2021	Y
	Spokane Regional Health District	2018-10218	2017-2018	Mobility Management	Capital	Project Termination	\$ 49,255	Y	6/25/2021	7/30/2021	7/28/2021	Y
WA-2020-025	Southside Community Center	2019-10426	2019	Vehicle Purchase	Capital	Agreement Executed	\$ 60,775	Y	5/6/2020	6/30/2020	6/30/2020	Y
	Spokane Neighborhood Action Partners	2019-10425	2019	Neighbors on the GO	Operating	Project Termination	\$ 119,052	Y	5/26/2021	6/30/2021	7/28/2021	Y
	Spokane Area Jewish Family Services	2019-10427	2019	Transportation Program	Operating	Project Termination	\$ 1,430	Y	7/26/2021	8/30/2021	7/28/2021	Y
	Arc of Spokane	2019-10429	2019	Vehicle Purchase	Capital	Agreement Term Extension- Useful Service Life	\$ 88,860	Y	7/26/2021	8/30/2021	7/28/2021	Y
WA-2021-023	Arc of Spokane	2020-10531	2020	Inclusive Mobility	Operating	Agreement Executed	\$ 85,251	Y	6/22/2021	7/30/2021	7/28/2021	Y
	Arc of Spokane	2020-10531.1	2020	Inclusive Mobility	Operating	Term extended	\$ 85,251	Y	5/11/2023	6/11/2023	10/16/2023	Y
	Southside Community Center	2019-10539	2020	Vehicle Purchase	Capital	Agreement Executed	\$ 20,836	Y	5/13/2021	6/30/2021	6/10/2021	Y
	Special Mobility Services	2020-10532	2020	Mobility Management	Capital	Agreement Executed	\$ 150,764	Y	6/21/2021	7/30/2021	7/28/2021	Y
	Special Mobility Services	2020-10532.1	2020	Mobility Management	Capital	De Minimis Expense Added	\$ 165,840	Y	10/18/2021	11/30/2021	11/30/2021	Y
	Special Mobility Services	2020-10532.2	2020	Mobility Management	Capital	Grant reduced, term extended	\$ 146,334	Y	2/15/2023	3/15/2023	2/22/2023	Y
	Spokane Neighborhood Action Partners	2020-10533	2020	Vehicle Purchase	Capital	Agreement Executed	\$ 48,960	Y	8/16/2021	9/30/2021	8/27/2021	Y
	Spokane Neighborhood Action Partners	2020-10533.1	2020	Vehicle Purchase	Capital	Funds added, term extended	\$ 74,178	Y	1/17/2023	2/17/2023	2/15/2023	Y
	Spokane Neighborhood Action Partners	2020-10534	2020	Neighbors on the GO	Operating	Agreement Executed- Two FAINs	\$ 70,000	Y	7/6/2021	8/30/2021	7/28/2021	Y
	Spokane Neighborhood Action Partners	2020-10534.1	2020	Neighbors on the GO	Operating	Term Extended- Two FAINs	\$ 70,000	Y	12/30/2022	1/30/2023	1/10/2023	Y
Special Mobility Services	2020.10532.2	2020	Mobility Management	Capital	Increased by \$14k and extend term	\$ 161,138	Y	12/26/2023	1/26/2024	1/10/2024	Y	
WA-2021-029	Spokane Neighborhood Action Partners	2020-10534	2020	Neighbors on the GO	Operating	Agreement Executed- Two FAINs	\$ 100,000	Y	7/6/2021	8/30/2021	7/28/2021	Y
	Spokane Neighborhood Action Partners	2020-10534.1	2020	Neighbors on the GO	Operating	Term Extended- Two FAINs	\$ 100,000	Y	12/30/2022	1/30/2023	1/10/2023	Y
WA-2022-022	Cancer Can't	2022-10691	2021	Transportation Support for Cancer Patients	Operating	Agreement Executed	\$ 38,584	Y	8/3/2022	9/3/2022	8/30/2022	Y
	Cancer Can't	2022-10691.1	2021	Transportation Support for Cancer Patients	Operating	STA local funds added, term extended	\$ 77,168	Y	12/16/2022	1/16/2022	1/10/223	Y
	COAST Transportation	2023-10884	2021	Demand Response	Operating	Agreement Executed- Two FAINs	\$ 23,786	Y	11/21/2023	12/21/2023	12/8/2023	Y
	Special Mobility Services	2022-10719	2021	Spokane Shopper	Operating	Agreement Executed- Two FAINs	\$ 8,843	N	4/19/2023	5/19/2023	4/19/2023	Y
	Special Mobility Services	2022-10719.1	2021	Spokane Shopper	Operating	Adding FAIN - Two FAINs	\$ 8,843	N	2/5/2024	3/5/2024	2/7/2024	Y
WA-2022-021	Special Mobility Services	2022-10719.1	2021	Spokane Shopper	Operating	Adding FAIN - Two FAINs	\$ 68,741	Y	4/18/2023	5/18/2023	2/7/2024	Y
	Special Mobility Services	2023-10819.1	2021	Mobility Training	Operating	Adding FAIN and Extending Term	\$ 2,473	N	4/19/2023	5/19/2023	2/7/2024	Y
WA-2023-044	SNAP Resource Rides	2023-10816	2021	Neighbors on the GO	Operating	Agreement Executed - Two FAINs	\$ 54,819	Y	10/13/2023	11/13/2023	10/16/2023	Y
	Cancer Can't	TBD	2022	Transportation Support for Cancer Patients	Operating	Agreement Executed	\$ 35,740	Y	10/30/2023	11/30/2023	10/30/2023	Y
	COAST Transportation	2023-10884	2022	Demand Response	Operating	Agreement Executed- Two FAINs	\$ 98,183	Y	11/21/2023	12/21/2023	12/8/2023	Y
	Special Mobility Services	2023-10820.1	2022	Mobility Management	Capital	Agreement Executed, Add FAIN, Extend Term, Adjust Total Project Cost - Two FAINs	\$ 230,685	Y	4/19/2024	5/30/2024	4/15/2024	Y
WA-2024-035	Special Mobility Services	2023-10820.1	2022	Mobility Management	Capital	Agreement Executed, Add FAIN, Extend Term, Adjust Total Project Cost - Two FAINs	\$ 36,976	Y	4/15/2023	5/15/2023	4/19/2023	Y
	SNAP Resource Rides	2023-10816	2022	Neighbors on the GO	Operating	Agreement Executed - Two FAINs	\$ 72,764	Y	10/13/2023	11/13/2023	10/13/2026	Y
	Arc of Spokane	2023-10883	2022	Community Center Transportation	Operating	Agreement Executed	\$ 101,360	Y	11/29/2023	12/29/2023	11/29/2023	Y
	COAST Transportation	2023-10885	2022	ADA Vehicle Purchase	Capital	Agreement Executed	\$ 73,000	Y	11/27/2023	12/27/2023	11/27/2023	Y
WA-2025-037	Project ID	2024-10931	2023	ADA Vehicle Purchase	Capital	Agreement Executed	\$ 127,500	Y	11/14/2024	12/14/2024	11/14/2024	Y
	Special Mobility Services	2024-10930	2023	Mobility Management	Capital	Agreement Executed	\$ 210,913	Y	11/4/2024	12/4/2024	11/4/2024	Y
	Cancer Can't	2024-10934	2023	Transportation Support for Cancer Patients	Other	Agreement Executed	\$ 78,109	Y	3/5/2024	4/5/2024	3/5/2025	Y
	SNAP	2024-10933	2023	Neighbors on the Go	Other	Agreement Executed	\$ 53,033	Y	8/11/2025	9/11/2025	8/11/2025	Y
	Special Mobility Services	2024-10929	2023	Spokane Shopper	Other	Agreement Executed	\$ 49,042	Y	11/4/2024	12/4/2024	11/4/2024	Y
	Special Mobility Services	2024-10928	2023	Mobility Training	Other	Agreement Executed	\$ 81,447	Y	11/4/2024	12/4/2024	11/4/2024	Y
	Southside Community Center	2024-10932	2023	Operating Support	Other	Agreement Executed	\$ 15,252	Y	10/16/2024	11/16/2024	10/16/2024	Y
1733-2025-3	Riverview Retirement	TBD	2024	ADA Vehicle Purchase	Capital	Pending						
	Cancer Can't	TBD	2024	Transportation Support for Cancer Patients	Other	Pending						
	The Arc of Spokane	TBD	2024	Community Center Transportation	Other	Pending						
FY25 TBD	Gonzaga University	TBD	2025	ADA Vehicle Purchase	Capital	Pending						
	Southside Community Center	TBD	2025	ADA Vehicle Purchase	Capital	Pending						
	Special Mobility Services	TBD	2025	Mobility Management	Capital	Pending						
	Merry Glenn	TBD	2025	Accessible Transit for Engagement	Other	Pending						
	Cancer Can't	TBD	2025	Transportation Support for Cancer Patients	Other	Pending						
Special Mobility Services	TBD	2025	Spokane Shopper	Other	Pending							
Southside Community Center	TBD	2025	Operating Support	Other	Pending							



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.



SOP #: AD-GA-003

Effective: 3/17/2023

Review: 2/8/2023

Replaces: N/A

- 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:

Date:

3/21/2023

Karl Otterstrom, Chief Planning and Development Officer

Revision History:

Version No.	Effective Date	Description

2026 New Applicant Risk Assessment

Organization Name:

Project Name(s):

Reviewer Name:

Review Date:

Background & Grant Experience

Q1 Does the agency have prior experience managing federal or state grants (eg., 5307, 5309, 5311, WSDOT)?

5 + years	0
3-5 years	1
0-3 years	2

Q2 Does the agency have prior experience managing FTA Section 5310 funds?

5 + years	0
3-5 years	1
0-3 years	2

Q3 Does the agency have prior experience with FTA grant programs beyond Section 5310?

5 + years	0
3-5 years	1
0-3 years	2

Capacity & Capability

Q4 Are key personnel responsible for grant management, reporting and financials experienced or trained in grant compliance?

5+ years	0
2-5 years	1
Less than 2 years	2

Q5 Have there been recent management/staff turnovers or major system reorganizations affecting this program in the past 12 months?

No turnover or reorganization	0
Little turnover or reorganization	1
Significant turnover or reorganization	2

Q6 Does the agency have written financial policies and procedures?

Formal/written and distributed to employees	0
Informal policies and controls	1
No policies or controls	2

Financial Management & Internal Controls

Are internal controls in place to prevent fraud, waste, and abuse (e.g., segregation of duties, reconciliations, approvals)?
Q7

All duties segregated	0
Some duties Segregated	1
Little to no segregation of duties	2

Does the accounting system identify receipts and expenditures by award/project (separate tracking per grant)?
Q8

Accounting system identifies program funds separately for each award	0
Accounting system identifies receipts and expenditures of program funds but does not distinguish other program funds	1
Account system does not identify receipts and expenditures of program funds	2

Has the subrecipient completed a voluntary annual financial review or if federally required, an annual financial audit by an independent auditor for the most recent year available?
Q9

Most recent year audit completed	0
Most recent year audit in progress	1
Most recent year audit overdue	2

Has the agency been issued material audit finding(s) & Corrective Action Plan by an independent auditor, STA, or other oversight agency in the past 12 months?
Q10

No findings or corrective action plan issued	0
Findings or corrective action plan issued and addressed	1
Findings or corrective action plan issued	2

Legal & Risk History

Has your organization had any lawsuits in the past 5 years such as EEO, DBE, Q11 or a contractor suing for payment?

No previous or current suits	0
Prior lawsuits resolved	1
Currently in a lawsuit	2

Have any current or former staff been arrested, convicted of a felony, or Q12 under criminal investigation?

No staff arrested, convicted or currently under criminal investigation	0
Staff have been arrested, convicted, or is currently under criminal investigation	2

Does your organization have any violations of federal criminal law involving Q13 fraud, bribery, or gratuity related to federal awards?

No	0
Yes	2

Is the subrecipient excluded/debarred in SAM.gov?

Q14 No	0
Yes	2

Score

Raw Score	
Conversion	0.0
Overall Scoring Criteria Range	
0 - 3.21	Risk Level
3.57 - 6.79	Low
7.41 - 10	Medium
	High

Criteria

Range	Action	Risk Level
0 - 9	Regular Monitoring Requirements	Low
10 - 19	Annual Site Visits/Inspections, Additional training assistance as needed	Medium
20 - 28	Detailed Back Up Documentation, Quarterly Desk Audits	High

2026 Subrecipient Risk Assessment

Organization Name:

Project Name(s):

Reviewer Name:

Review Date:

Background & Grant Experience

Does the agency have prior experience managing federal or state grants (eg., Q1 5307, 5309, 5311, WSDOT)?

5 + years	0
3-5 years	1
0-3 years	2

Q2 Does the agency have prior experience managing FTA Section 5310 funds?

5 + years	0
3-5 years	1
0-3 years	2

Does the agency have prior experience with FTA grant programs beyond Q3 Section 5310?

5 + years	0
3-5 years	1
0-3 years	2

Capacity & Capability

Are key personnel responsible for grant management, reporting and financials Q4 experienced or trained in grant compliance?

5+ years	0
2-5 years	1
Less than 2 years	2

Have there been recent management/staff turnovers or major system Q5 reorganizations affecting this program in the past 12 months?

No turnover or reorganization	0
Little turnover or reorganization	1
Significant turnover or reorganization	2

Q6 Does the agency have written financial policies and procedures?

Formal/written and distributed to employees	0
Informal policies and controls	1
No policies or controls	2

Financial Management & Internal Controls

Are internal controls in place to prevent fraud, waste, and abuse (e.g., segregation of duties, reconciliations, approvals)?
Q7

All duties segregated	0
Some duties Segregated	1
Little to no segregation of duties	2

Does the accounting system identify receipts and expenditures by award/project (separate tracking per grant)?
Q8

Accounting system identifies program funds seperately for each award	0
Accounting system identifies reciepts and expenditures of program funds but does not distinguish other program funds	1
Account system does not identifty receipts and expenditures of program funds	2

Has the subrecipient completed a voluntary annual financial review or if federally required, an annual financial audit by an independent auditor for the most recent year available?
Q9

Most recent year audit completed	0
Most recent year audit in progress	1
Most recent year audit overdue	2

Has the subrecipient submitted requests for reimbursement on time in the past 12 months?
Q10

All requests submitted on time	0
4 requests submitted late	1
6 or more requests submitted late	2

Has the subrecipient submitted requests for reimbursement supported with complete and accurate documentation?
Q11

All requests supported with complete and accurate documentation	0
4 requests missing complete and accurate documentation	1
6 or more requests missing complete and accurate documentation	2

Compliance and Oversight

Q12 Has the subrecipient submitted the last four quarterly reports on time?

All quarterly reports submitted on time	0
2 quarterly reports submitted late	1
4 quarterly reports submitted late	2

Has the subrecipient submitted complete and accurate quarterly reports over
Q13 the past four quarters?

All requests complete and accurate	0
2 reports incomplete or inaccurate	1
4 reports incomplete and inaccurate	2

Has the subrecipient complied with Civil Rights requirements (Title VI, ADA,
Q14 LEP)?

Current Title VI Program	0
Expired Title VI Program	1
No Title VI Program	2

Does the subrecipient report material delays to scope of work objectives or
Q15 unforeseen pauses in service?

Material delays reported	0
Some material delays reported	1
No material delays reported	2

Has the agency been issued material audit finding(s) & Corrective Action Plan
by an independent auditor, STA, or other oversight agency in the past 12
Q16 months?

No findings or corrective action plan issued	0
Findings or corrective action plan issued and addressed	1
Findings or corrective action plan issued	2

Legal & Risk History

Has your organization had any lawsuits in the past 5 years such as EEO, DBE, or Q17 a contractor suing for payment?

No previous or current suits	0
Prior lawsuits resolved	1
Currently in a lawsuit	2

Have any current or former staff been arrested, convicted of a felony, or under Q18 criminal investigation?

No staff arrested, convicted or currently under criminal investigation	0
Staff have been arrested, convicted, or is currently under criminal investigation	2

Does your organization have any violations of federal criminal law involving Q19 fraud, bribery, or gratuity related to federal awards?

No	0
Yes	2

Is the subrecipient excluded/debarred in SAM.gov?

Q20 No	0
Yes	2

Score

Raw Score	
Conversion	0
Overall Scoring Criteria Range	
0 - 3.25	Risk Level Low
3.5 - 6.5	Medium
6.75 - 10	High

Criteria

Range	Action	Risk Level
0 - 13	Regular Monitoring Requirements	Low
14 - 26	Annual Site Visits/Inspections, Additional training assistance as needed	Medium
27 - 40	Detailed Back Up Documentation, Quarterly Desk Audits	High

Spokane Transit Authority
Federal Transit Administration Section 5310 Program:
Enhanced Mobility for Seniors and Individuals with Disabilities Funding
Preliminary Proposal

Project Title:

Important: *FTA funds require detailed reporting and compliance with federal requirements. Please review the Section 5310 Program Management Plan and associated materials before applying.*

*Preliminary proposals due by **5:00 P.M. on August 31, 2026.**
Final project applications due by **5:00 P.M. on September 28, 2026.***

Final Applications must include all required attachments to be considered. Late applications will not be accepted. Applications can be submitted electronically to Section5310@spokanetransit.com or postmarked on or before 9/23/2026 and mailed to:

*Spokane Transit Authority
Attn: Emilio Bustos
701 W Riverside Ave.
Spokane, WA 99201*

2026 Call for Project Details

Spokane Transit Authority (STA) is issuing a call for projects that will be funded with Federal Transit Administration (FTA) Section 5310 (Enhanced Mobility for Seniors and Individuals with Disabilities) Program funding and STA local contributions. On July XX, 2026, the STA Board approved the recommendation to contribute \$XXX in STA local match to offset subrecipient local match requirements for both “Traditional” and “Other” projects to 15%. STA uses a two-step application process (Preliminary Proposal and Final Application) for organizations seeking Section 5310 federal funding. This applies to both Capital (Traditional) and Operating (Other) project types. There are approximately \$XXX in Section 5310 federal funds and STA local funds available for this call for projects (see table below for specific grant sources and amounts).

Of the total 2026 apportionment funds available under Section 5310, a minimum of 55% must be spent on “Traditional” Operating projects and maximum of 45% of funds can be spent on “Other” operating projects. If STA finds there are no eligible applicants available to provide services, STA may certify this scenario to FTA. STA would then allocate available Section 5310 apportionments to fund contracted services.

Projects selected to receive funding must primarily benefit seniors and individuals with disabilities as well as support strategies currently identified in the Spokane County Coordinated Public Transit-Human Services Transportation Plan.

2026 Call for Projects Funding Table

Funding	Amount Available
FY 2026 Federal Apportionment	\$XXX
STA Local Match Contribution	\$XXX
Total Funding Available	\$XXX

Preliminary Proposal Notice

Preliminary proposals are required to express interest in Section 5310 funding and help STA determine initial project eligibility and allow for a preliminary risk assessment. New applicants and returning subrecipients classified as high risk are required to meet with the Assistant Transit Planner to review project scope and risk assessment before the preliminary proposal due date. Preliminary Proposal funding requests are not considered final and may be reasonably modified before submitting the final application. STA will host an informational meeting via Microsoft Teams on Tuesday, August 12, 2025, from 10:00–11:00 A.M. via Microsoft Teams to answer questions about program and project eligibility. One-on-one technical assistance is also available upon request. Applicants will be notified of ineligibility prior to Final Application due date.

Preliminary proposals are due Tuesday, August 31, 2026, by 5:00 P.M.

For informational meeting questions, contact:

Emilio Bustos, Assistant Transit Planner
(509) 344-2609

ebustos@spokanetransit.com

To request accommodations, contact:

Delana Combs, Ombudsman
(509) 325-6094

Please submit requests at least 48 hours in advance

Eligible Applicants

Eligible project applicants can be either private, non-profit organizations, local governments, or other providers of public transportation that provide transportation services for seniors and individuals with disabilities. To be considered a provider of public transportation, an agency must provide “shared-ride” transportation, which means that it may transport two or more passengers in the same vehicle who are otherwise not travelling together (as opposed to exclusive-ride taxi services). Providers of public transportation can be either public or private agencies.

The evaluations committee, comprised of STA, WSDOT, and SRTC staff, will evaluate submitted projects and a final list of recommended projects will be forwarded to the STA Board of Directors for approval. More information on project scoring and evaluation criteria can be found in STA’s Program Management Plan (PMP) for Section 5310.

Spokane Transit assures nondiscrimination in accordance with Title VI of the Civil Rights Act of 1964. For more information, visit www.spokanetransit.com. Upon request, alternative formats of this information will be produced for individuals who are disabled. For accommodations, please call 325-6096 (TTY Relay 711) at least forty-eight (48) hours in advance.

Title VI

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. The STA Title VI Program is a required part of the training for all public-facing employees. Subrecipients awarded 5310 funding must submit their Title VI Program to STA to assist in compliance efforts. STA program staff will use the Title VI Checklist to ensure that Title VI Programs meet all requirements.

Title VI Non-Discrimination Notice

Title VI of the Civil Rights Act of 1964 states that, “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program receiving Federal financial assistance.”

Spokane Transit Authority (STA) does not discriminate in the provision of service on the basis of race, color, or national origin. Any person who believes STA has discriminated against him or her on the basis of race, color, or national origin may file a complaint using form linked below.

If information is needed in another language, contact (509) 325-6094.

Si necesita información en otro idioma, comuníquese al (509) 325-6094.

Для получения информации на другом языке звоните по тел. (509) 325-6094.

Nếu quý vị cần thông tin bằng một ngôn ngữ khác, xin vui lòng gọi số (509) 325-6094.

Щоб отримати інформацію іншою мовою, зателефонуйте за номером (509) 325-6094.

Elañe mejele ej aikuj ilo juon bar kajin, kerpāake (509) 325-6094.

الرقم مع فتواصل أخرى، بلغة المعلومات إلى احتجت إذا (509) 325-6094.

Title VI Complaint Form

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by an STA employee may file a Title VI complaint by completing and submitting the official Title VI Complaint Form provided on STA’s website.

Complaint forms in English, as well as the six identified languages (Spanish, Russian, Vietnamese, Ukrainian, Marshallese, and Arabic) are available upon request or online on [STA’s Title VI webpage](https://www.spokanetransit.com/projects/title-vi-non-discrimination-policy-and-program/). (<https://www.spokanetransit.com/projects/title-vi-non-discrimination-policy-and-program/>)

If a citizen wants more information on STA's commitment to nondiscrimination, or requires a copy of the Title VI Complaint Form in an alternative format due to a disability, they can contact the STA Ombudsman:

Ombudsman & Accessibility Officer
1230 West Boone Avenue Spokane, WA 99201
(509) 325-6094

TTY Relay 711

ombudsman@spokanetransit.com

Please submit requests at least 48 hours in advance

Traditional 5310 Projects

Traditional 5310 projects refer to capital expenses that specifically serve the needs of seniors and individuals with disabilities, as defined in 49 USC 5302 and 5310(b)(1)(A). Capital projects typically require a 20% local match however, per STA Board approval for the 2025 Call for Projects, capital projects will be subject to a reduced local match requirement of 15% subrecipient local match. Eligible projects must meet the definition of a Capital project, as defined in 49 USC 5302 and be carried out by eligible subrecipients. In addition, subrecipients must be able to prove that the project will primarily benefit seniors and people with disabilities.

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. Operating projects include a 50% local match, however, per STA Board approval for the 2025 Call for Projects, operating projects will be subject to a reduced local match requirement of 15% subrecipient local match. Eligible operating projects must be targeted toward meeting the transportation needs of seniors and individuals with disabilities, although they may be used by the general public. Applicants must prove that the project will primarily benefit seniors and people with disabilities in their application(s). Refer to Attachment A for a list of eligible Section 5310 Operating projects.

Project Geographic Area

Eligible subrecipient transportation service projects must start or end services within 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 most trips are operated within the Spokane UZA.

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).

Volunteer in-Kind Cost Share

Any shared costs (matching funds), including contributed volunteer services furnished by third parties, 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 listed below. Refer to Attachment A for a list of eligible Section 5310 Operating projects.

Section I: Applicant Contact Information

Organization Background

Primary Contact Information	
Applicant name:	
Title:	
Email:	
Physical Address:	
Phone:	

If applicable: Authorized Organization Representative (AOR):	
Name:	
Title:	
Email:	
Phone:	
Organization:	

Organization Information	
Legal Name:	
Doing Business as, name:	
Entity Type:	Enter entity type.
Phone:	
Website:	
Federal Tax ID:	
Physical Address:	
Unique Entity Identifier:	
WA Unified Business Identifier:	
System for Award Management:	Enter expiration date.
Title VI Plan	Enter expiration date.

Application Type

1. Enter project Type. Refer to Attachment A for a list of eligible Section 5310 Capital projects.

Traditional (Capital) Project Type: *Select capital project type.*

If your capital project is not listed above enter here:

Other (Operating) Project Type: *Select operating project type.*

If your operating project is not listed above enter here:

Important: Eligible subrecipient transportation service projects must start or end services within 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 most trips are operated within the Spokane UZA.

Section II: Project Cost

Preliminary Funding Proposal

- Enter the federal, STA local match and applicant match in your selected project type's funding table below. Preliminary funding proposals may be reasonably modified before submitting the final application.

"Traditional" Capital/Mobility Management Funding Summary							
Federal Match		STA Match*		Applicant Match		Total Project Cost	
80%	\$	5%	\$	20%	\$	100%	\$

"Traditional" Capital/Vehicle Funding Summary							
Federal Match		STA Match*		Applicant Match		Total Project Cost	
80%	\$	5%	\$	15%	\$	100%	\$

"Other" Operating Funding Summary							
Federal Match		STA Match*		Applicant Match		Total Project Cost	
50%	\$	35%	\$	15%	\$	100%	\$

*** Important:** The allocation of the \$XXX in STA local funds is subject to project evaluation, ranking, and Planning & Development Committee recommendation to the Board of Directors.

The applicant match is what your organization is required to provide in local match requirements.

- Enter the project's intended sources of local match in the table below.

Funding Type	Awarded By	Amount

Important: Federal funds may not be used to meet the non-Federal share of costs of another Federal award unless authorized by Federal statute. You must certify in your final application that your matching funds are not federal.

- If applicable, enter the indirect cost rate. *If entering a federally approved rate, please attach the formal certification.*

Answer: *Enter indirect cost rate.*

- For projects Capital projects applicants, does your organization have a written policy to prevent and investigate theft, loss, or damage of property?

Answer: *Select Response.*

Section III: Project Information

Project Scope of Work

6. Provide a brief, high-level description of how your project will provide a service that directly benefits seniors and/or persons with disabilities a what transportation gaps this would fill.

7. If applicable, enter current operating agreement details in the table below.

Active Subrecipient Agreement Information	
Agreement #	
Agreement Start Date	<i>Enter start date.</i>
Agreement End Date	<i>Enter end date.</i>
Remaining Grant Balance	

Active Subrecipient Funding Information							
Federal Match		STA Match		Applicant Match		Total Project Cost	
50%	\$	35%	\$	15%	\$	100%	\$

Section IV: Risk Assessment

Risk Assessment

Spokane Transit will evaluate each applicant’s risk of noncompliance to determine appropriate monitoring and oversight. The assessment will follow the criteria outlined in OMB Guidance 2 CFR 200.332. Complete and attach the Section 5310 Risk Assessment Questionnaire. The questionnaire requests the applicant submit written procedures, if available, including:

Policies Requested	Notes
Financial Management 2 CFR 200.302	Must outline fund tracking processes
Internal Controls 2 CFR 200.303	Include fraud prevention and separation of duties
Conflict of Interest 2 CFR 200.112	For staff, board, and procurement
Procurement 2 CFR 200.318	Must align with federal standards
Compensation–Personal Services 2 CFR 200.430	Needed if claiming personnel costs
Transportation Cost Policy 2 CFR 200.474	If claiming mileage, fuel, etc.
Equipment Management Policy 2 CFR 200.313	Required if purchasing capital items

Section V: Project Administration

New Applicants

Applicants seeking Section 5310 project funds may be asked to provide additional information to demonstrate capacity to operate under federal guidelines. Additional information may include a logic model, business plan, needs assessment, or equivalent documentation. If after preliminary review STA determines this requirement is applicable, STA may request the applicant submit one or more supplemental documents with the Final Project Application.

If you are a new section 5310 applicant, contact:

Emilio Bustos

ebustos@spokanetransit.com.

Section VI: Finishing Up

Attachments Checklist

Attach the following items with your Preliminary Proposal Application.

Required Documents	Notes
Complete Preliminary Proposal	Include all project specific information
Organization Audit	Most recent report
Preliminary Vehicle Information	If applicable, preliminary quote, make, model, seating, etc.
Federally approved Indirect Cost Rate	If applicable
Title VI Program Status (current or not)	Provide latest program or submit a timeline to draft and approve a Title VI program
Active SAM.gov Registration	Must have valid UEI; SAM active by final submission
501(c)(3) Determination Letter	For nonprofits only

Section VII: Applicant Certification

The Applicant affirms the individual executing the application has been granted the authority to do so, and by their signature, affirms the Applicant will comply with the terms and conditions of this application.

Printed Name

Title

Authorized Signature

Date

Attachment A

List of Eligible Capital Projects for Section 5310 Funding

- 1) **Rolling Stock and Related Activities for Section 5310-Funded Vehicles.**
 - a) Acquisition of expansion or replacement buses or vans, and related procurement, testing, inspection, and acceptance costs
 - b) Vehicle rehabilitation or overhaul
 - c) Preventive maintenance
 - d) Radios and communication equipment
 - e) Vehicle wheelchair lifts, ramps, and securement devices.

- 2) **Passenger Facilities Related to Section 5310-Funded Vehicles.**
 - a) Purchase and installation of benches, shelters, and other passenger amenities.

- 3) **Support Facilities and Equipment for Section 5310-Funded Vehicles.**
 - a) Extended warranties that do not exceed the industry standard
 - b) Computer hardware and software
 - c) Transit-related intelligent transportation systems (ITS)
 - d) Dispatch systems
 - e) Fare collection systems.

- 4) **Lease of Rolling Stock or Related Equipment.** Requirements regarding leases are governed by the Uniform Guidance, 2 CFR Part 200. Please see FTA Circular 5010.1 for a summary of requirements related to leasing.

- 5) **Acquisition of Transportation Services under a Contract, Lease, or Other Arrangement.** This may include acquisition of ADA complementary paratransit services when provided by an eligible recipient or subrecipient as defined in Chapter Both capital and operating costs associated with contracted service are eligible capital expenses. User-side subsidies/vouchers for alternatives to public transportation are considered one form of eligible arrangement. All services must meet all Federal civil rights requirements, including those requiring equivalent service to persons with disabilities, particularly wheelchair users, in the provision of demand-responsive service and any ADA title II program access responsibilities administered by the U.S. Department of Justice. Funds may be requested for contracted services covering a time period of more than one year. The capital eligibility of acquisition of services as authorized in 49 U.S.C. 5310(b)(4) is limited to the Section 5310 program.

- 6) **Support for Mobility Management and Coordination Programs among Public Transportation Providers and Other Human Service Agencies Providing Transportation.** Mobility management is an eligible capital cost. Mobility management techniques may enhance transportation access for populations beyond those served by one agency or organization within a community. For example, a nonprofit agency could receive Section 5310 funding to support the personnel costs of sharing services it provides to its own clientele with other seniors and/or individuals with disabilities and to coordinate usage of vehicles with other nonprofits; however, operating costs of service are excluded. Mobility management is intended to build coordination among existing public transportation providers and other transportation service providers with the result of expanding the availability of service.
 - a) The promotion, enhancement, and facilitation of access to transportation services, including the integration and coordination of services for individuals with disabilities, seniors, and low-income individuals.
 - b) Support for short-term management activities to plan and implement coordinated services.
 - c) The support of State and local coordination policy bodies and councils.
 - d) The operation of transportation brokerages to coordinate providers, funding agencies, and passengers.

- e) The provision of coordination services, including employer-oriented transportation management organizations' and human service organizations' customer-oriented travel navigator systems and neighborhood travel coordination activities, such as coordinating individualized travel training and trip planning activities for customers.
- f) The development and operation of one-stop transportation traveler call centers to coordinate transportation information on all travel modes and to manage eligibility requirements and arrangements for customers among supporting programs.
- g) Operational planning for the acquisition of intelligent transportation technologies to help plan and operate coordinated systems inclusive of geographic information systems (GIS) mapping; global positioning system technology; coordinated vehicle scheduling; dispatching and monitoring technologies; technologies to track costs and billing in a coordinated system; and single smart customer payment systems. (Acquisition of technology is also eligible as a standalone capital expense).

List of Eligible Operating Projects for Section 5310 Funding

Public transportation projects that exceed the requirements of the ADA.

1) Enhancing paratransit beyond minimum requirements of the ADA

- a. Expansion of paratransit service parameters beyond the three-fourths mile required by the ADA
- b. Expansion of current hours of operation for ADA paratransit services that are beyond those provided on the fixed-route services
- c. The incremental cost of providing same day service
- d. The incremental cost (if any) of making door-to-door service available to all eligible ADA paratransit riders but not on a case-by-case basis for individual riders in an otherwise curb-to-curb system
- e. Enhancement of the level of service by providing escorts or assisting riders through the door of their destination
- f. Acquisition of vehicles and equipment designed to accommodate wheelchairs that are larger than 30" x 48" and/or weigh more than 600 pounds when occupied and labor costs of aides to help drivers assist passengers with oversized wheelchairs. This would permit the acquisition of lifts with a larger capacity modification to lifts with a 600-pound design load, and the acquisition of heavier duty vehicles for paratransit and/or demand-response service in order to accommodate lifts with a heavier design load
- g. Installation of additional securement locations in public transit buses beyond minimum ADA requirements.

2) Feeder Services

- a. Accessible "feeder" service (transit service that provides access) to commuter rail, commuter bus, intercity rail, and intercity bus stations, for which complementary paratransit service is not required under the ADA.

Public Transportation Projects that improve access to fixed-route service and decrease reliance by individuals with disabilities on ADA-complementary paratransit service

1) Making Accessibility Improvements to Transit and Intermodal Stations Not Designated as Key Stations.

- a. Improvements for accessibility at existing transportation facilities that are not designated as key stations established under 49 CFR 37.47, 37.51, or 37.53 and that are not required under 49 CFR 37.43 as part of an alteration or renovation to an existing station, so long as the projects are clearly intended to remove barriers that would otherwise have remained. Section 5310 funds are eligible to be used for accessibility enhancements that remove barriers to individuals with disabilities so they may access greater portions of public transportation systems such as fixed-route bus service, commuter rail, light rail, and rapid rail. This may include:
- b. Building an accessible path to a bus stop that is currently inaccessible, including curb cuts, sidewalks, accessible pedestrian signals, or other accessible features

- c. Adding an elevator or ramps, detectable warnings, or other accessibility improvements to a non-key station that are not otherwise required under the ADA
- d. Improving signage or wayfinding technology
- e. Implementation of other technology improvements, including ITS, that enhance accessibility for people with disabilities.

2) Travel Training

- a. Training programs for individual users on awareness, knowledge, and skills of public and alternative transportation options available in their communities. This includes travel instruction and travel training services.

Public Transportation projects that provide alternatives to public transportation that assist seniors and individuals with disabilities with transportation.

1) Purchasing vehicles to support accessible taxi, TNC, ride-Sharing, and/or vanpooling programs.

- a. Section 5310 funds can be used to purchase and operate accessible vehicles for use in taxi, TNC, ride-sharing, and/or vanpool programs provided that the vehicle meets the same requirements for lifts, ramps, and securement systems specified in 49 CFR Part 38, subpart B, at a minimum, and permits a passenger whose wheelchair can be accommodated pursuant to Part 38 to remain in their personal mobility device inside the vehicle.

2) Supporting the Administration of and Expenses Related to Voucher Programs for Transportation Services Offered by Human Service Providers.

- a. This activity is intended to support and supplement existing transportation services by expanding the number of providers available or the number of passengers receiving transportation services. Vouchers can be used as an administrative mechanism for payment of alternative transportation services to supplement available public transportation. The Section 5310 program can provide vouchers to seniors and individuals with disabilities to purchase rides, including: (a) mileage reimbursement as part of a volunteer driver program; (b) a taxi trip; or (c) trips provided by a human service agency. Providers of transportation can then submit the voucher for reimbursement to the recipient

3) For payment based on predetermined rates or contractual arrangements.

- a. Transit passes or vouchers for use on existing fixed-route or ADA complementary paratransit service are not eligible. Vouchers are an operational expense which requires a 50/50 (Federal/local) match.

4) Supporting Volunteer Driver and Aide Programs.

- a. Volunteer driver programs are eligible and include support for costs associated with administration; management of driver recruitment; safety; background checks; scheduling; coordination with passengers; related support functions; mileage reimbursement; and insurance associated with volunteer driver programs. The costs of enhancements to increase capacity of volunteer driver programs are also eligible. FTA encourages communities to offer consideration for utilizing all available funding resources as an integrated part of the design and delivery of any volunteer driver/aide program.

Spokane Transit Authority
Federal Transit Administration Section 5310 Program:
Enhanced Mobility for Seniors and Individuals with Disabilities Funding
Final Project Application

Project Title:

*Preliminary proposals due: 5:00 PM. on August 31, 2026.
Final project application due: 5:00 PM. on September 28, 2026.*

Incomplete submissions: Final Applications must include all project specific attachments to be considered. Late applications will not be accepted.

Final applications can be submitted electronically to Section5310@spokanetransit.com or postmarked on or before 9/28/2026 and mailed to:

*Spokane Transit Authority
Attn: Emilio Bustos
701 W Riverside Ave.
Spokane, WA 99201*

2026 Call for Project Details

Spokane Transit Authority (STA) is issuing a call for projects that will be funded with Federal Transit Administration (FTA) Section 5310 (Enhanced Mobility for Seniors and Individuals with Disabilities) Program funding and STA local contributions. On July XX, 2026, the STA Board approved the recommendation to contribute \$240,052 in STA local match to offset subrecipient local match requirements for both “Traditional” and “Other” projects to 15%. STA uses a two-step application process (Preliminary Proposal and Final Application) for organizations seeking Section 5310 federal funding. This applies to both Capital (Traditional) and Operating (Other) project types. There are approximately \$XXX in Section 5310 federal funds and STA local funds available for this call for projects (see table below for specific grant sources and amounts).

Of the total 2026 apportionment funds available under Section 5310, a minimum of 55% must be spent on “Traditional” Operating projects and maximum of 45% of funds can be spent on “Other” operating projects. If STA finds there are no eligible applicants available to provide services, STA may certify this scenario to FTA. STA would then allocate available Section 5310 apportionments to fund contracted services.

Projects selected to receive funding must primarily benefit seniors and individuals with disabilities as well as support strategies currently identified in the Spokane County Coordinated Public Transit-Human Services Transportation Plan SRTC CPT-HSTP.

2026 Call for Projects Funding Table

Funding	Amount Available
FY 2026 Federal Apportionment	\$XXX
STA Local Match Contribution	\$XXX
Total Funding Available	\$XXX

Meeting Scheduling

All applicants are required to meet with the Assistant Transit Planner to review the project budget prior to the final application due date. One-on-one technical assistance is also available upon request.

Final applications are due Tuesday, September 28, 2026, by 5:00 P.M.

For informational meeting questions, contact:

Emilio Bustos, Assistant Transit Planner
(509) 344-2609

ebustos@spokanetransit.com

To request accommodations, contact:

Delana Combs, Ombudsman
(509) 325-6094

Please submit requests at least 48 hours in advance

Eligible Applicants

Eligible project applicants can be either private, non-profit organizations, local governments, or other providers of public transportation that provide transportation services for seniors and individuals with disabilities. To be considered a provider of public transportation, an agency must provide “shared-ride” transportation, which means that it may transport two or more passengers in the same vehicle who are otherwise not travelling together (as opposed to exclusive-ride taxi services). Providers of public transportation can be either public or private agencies.

The evaluations committee, comprised of STA, WSDOT, and SRTC staff, will evaluate submitted projects and a final list of recommended projects will be forwarded to the STA Board of Directors for approval. More

information on project scoring and evaluation criteria can be found in STA's Program Management Plan (PMP) for Section 5310.

Spokane Transit assures nondiscrimination in accordance with Title VI of the Civil Rights Act of 1964. For more information, visit www.spokanetransit.com. Upon request, alternative formats of this information will be produced for individuals who are disabled. For accommodations, please call 325-6096 (TTY Relay 711) at least forty-eight (48) hours in advance.

Title VI

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. The STA Title VI Program is a required part of the training for all public-facing employees. Subrecipients awarded 5310 funding must submit their Title VI Program to STA to assist in compliance efforts. STA program staff will use the Title VI Checklist to ensure that Title VI Programs meet all requirements.

Title VI Non-Discrimination Notice

Title VI of the Civil Rights Act of 1964 states that, "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program receiving Federal financial assistance."

Spokane Transit Authority (STA) does not discriminate in the provision of service on the basis of race, color, or national origin. Any person who believes STA has discriminated against him or her on the basis of race, color, or national origin may file a complaint using form linked below.

If information is needed in another language, contact (509) 325-6094.

Si necesita información en otro idioma, comuníquese al (509) 325-6094.

Для получения информации на другом языке звоните по тел. (509) 325-6094.

Nếu quý vị cần thông tin bằng một ngôn ngữ khác, xin vui lòng gọi số (509) 325-6094.

Щоб отримати інформацію іншою мовою, зателефонуйте за номером (509) 325-6094.

Elañe meļeļe ej aikuj ilo juon bar kajin, kerāāke (509) 325-6094.

الرقم مع فتواصل أخرى، بلغة المعلومات إلى احتجت إذا (509) 325-6094.

Title VI Complaint Form

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by an STA employee may file a Title VI complaint by completing and submitting the official Title VI Complaint Form provided on STA's website.

Complaint forms in English, as well as the six identified languages (Spanish, Russian, Vietnamese, Ukrainian, Marshallese, and Arabic) are available upon request or online on [STA's Title VI webpage](http://www.spokanetransit.com/projects/title-vi-non-discrimination-policy-and-program/).

(<https://www.spokanetransit.com/projects/title-vi-non-discrimination-policy-and-program/>)

If a citizen wants more information on STA's commitment to nondiscrimination, or requires a copy of the Title VI Complaint Form in an alternative format due to a disability, they can contact the STA Ombudsman:

Ombudsman & Accessibility Officer
1230 West Boone Avenue Spokane, WA 99201
(509) 325-6094
TTY Relay 711
ombudsman@spokanetransit.com

Please submit requests at least 48 hours in advance

Traditional 5310 Projects

Traditional 5310 projects refer to capital expenses that specifically serve the needs of seniors and individuals with disabilities, as defined in 49 USC 5302 and 5310(b)(1)(A). Capital projects typically require a 20% local match however, per STA Board approval for the 2026 Call for Projects, capital projects will be subject to a reduced local match requirement of 15% subrecipient local match. Eligible projects must meet the definition of a Capital project, as defined in 49 USC 5302 and be carried out by eligible subrecipients. In addition, subrecipients must be able to prove that the project will primarily benefit seniors and people with disabilities.

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. Operating projects include a 50% local match, however, per STA Board approval for the 2026 Call for Projects, operating projects will be subject to a reduced local match requirement of 15% subrecipient local match. Eligible operating projects must be targeted toward meeting the transportation needs of seniors and individuals with disabilities, although they may be used by the general public. Applicants must prove that the project will primarily benefit seniors and people with disabilities in their application(s). Refer to Attachment B for a list of eligible Section 5310 Operating projects.

Project Geographic Area

Eligible subrecipient transportation service projects must start or end services within 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 most trips are operated within the Spokane UZA.

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).

Volunteer in-Kind Cost Share

Any shared costs (matching funds), including contributed volunteer services furnished by third parties, 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 listed below. Refer to Attachment B for a list of eligible Section 5310 Operating projects.

I. Project Overview

1. **Project Narrative:** Describe the service your project will deliver, who will be served (seniors and/or individuals with disabilities).

Answer:

2. **Enhancing Mobility:** Provide a detailed description of how this project will reduce transportation gaps and enhance transportation service for seniors and individuals with disabilities.

Answer:

II. Regional Transportation Needs

3. **HSTP Gaps and Needs:** Describe the specific gaps or needs identified in the Human Services Transportation Plan (HSTP) that the project addresses.

Answer:

4. **HSTP Strategies:** Describe the specific strategies identified in the HSTP that this project advances.

Answer:

III. Scope, Schedule, and Service Levels

5. **Total served:** Enter the total number of unique individuals the project would serve and methodology used:

Answer:

6. **Project duration:** Enter the total duration of the project in months.

Answer:

7. **Rider eligibility:** Summarize or attach the written procedures for verifying the rider/client eligibility, including how eligibility is determined at intake and documented for audit purposes.

Answer:

8. **Volunteer driver pool:** What is the minimum number of trained and active volunteer drivers required to deliver the project's planned full-service level?

Answer:

9. **Prior-year totals (if applicable):** If applying as a current subrecipient seeking continuation funds, use the table below to provide this project’s service metrics for the last 12 months, and agreement number.

Prior 12 Month Service Totals	
Total unique individuals served	
Total one-way trips provided	
Agreement Number	

IV. Local Match & Budget

10. **Local match sources:** Identify all sources of local (**non-Federal**) match for this project in the table below and attach documentation demonstrating availability (e.g., executed agreements, award letters, board resolutions, grant types, donor confirmations). Indicate the funding type (cash or in-kind) and current award status (secured or unsecured/pending).

Important: Federal funds may not be used to meet the non-federal share of costs of another federal award unless authorized by federal statute.

Local Match Disclosure Table				
Funder Name				
Amount	\$	\$	\$	\$
Funding Type	<i>Enter Funding Type</i>	<i>Enter Funding Type</i>	<i>Enter Funding Type</i>	<i>Enter Funding Type</i>
Award status	<i>Enter Award Status</i>	<i>Enter Award Status</i>	<i>Enter Award Status</i>	<i>Enter Award Status</i>

Important: Subrecipients must provide backup documentation of in-kind contributions to STA on a monthly basis, as a prerequisite for reimbursement. In-kind contributions may only be attributed to the month the service was provided and meet the required in-kind match proportion for each month’s expenses billed.

11. **In-Kind match (if applicable):** List each proposed source of in-kind local match. (e.g., This project will use volunteer driver mileage and hours to meet the full local match requirement)

Answer:

12. **In-kind (if applicable):** Will any of the in-kind sources listed above be used as match for any other pending awards or active agreements? If yes, summarize how the in-kind contributions will be tracked across multiple awards. Include any volunteer/staff training, driver logs, mapping & navigation software, staff responsible for verification, and how the in-kind will be recorded and verified in your accounting records.

Answer:

13. **Indirect cost rate (if applicable):** Enter the project’s indirect cost rate and base. If using a federally approved rate, attach the Negotiated Indirect Cost Rate Agreement (NICRA) to the final application.

Answer:

14. **Funding summary:** The funding tables below are organized by project type, assume this project is fully funded and enter the total federal, STA local match, and applicant match to create this projects funding split.

Important: On July XX, 2026, the STA Board approved the allocation of additional STA local dollars with the explicit intent of reducing the project’s local match to 15% for all projects recommended for funding. The allocation of STA local funds is subject to project evaluation, ranking, and Planning & Development Committee recommendation to the Board of Directors.

Capital/Mobility Management Funding Summary

Federal Match		STA Match		Applicant Match		Total Project Cost	
80%	\$100,000	5%	\$100,000	20%	\$100,000	100%	\$100,000

Vehicle Funding Summary

Federal Match		STA Match		Applicant Match		Total Project Cost	
85%	\$100,000	0%	\$100,000	15%	\$100,000	100%	\$100,000

Operating Funding Summary

Federal Match		STA Match		Applicant Match		Total Project Cost	
50%	\$100,000	35%	\$100,000	15%	\$100,000	100%	\$100,000

V. Performance Measures & Management

15. **Reporting service metrics:** Describe what tools/methods project staff will use to collect, track, and report performance data for this project (e.g., sign-in sheets, trip-purpose codes, CRM/case-management system, construction logs, fleet maintenance logs, referrals, trip origins/destinations, volunteer driver logs). For vehicle projects, indicate if the vehicle will be used for incidental purposes (trips that benefit individuals that are not seniors or individuals with disabilities) and how this use will not interfere with service provided to seniors or individuals with disabilities.

Answer:

16. **Key roles:** Describe all program staff member roles, responsibilities, and authority pertaining to the program workflow. Confirm whether all key roles for this project are filled. Provide name/titles and relevant experience for key staff. If hiring is pending, include a hiring plan with milestone dates.

Answer:

17. **Organizational experience:** Summarize organizational experience with Federal/State funds and grants compliance (e.g., prior program managed; reporting and audits).

Answer:

VI. Sustainability & Scalability

18. **Project sustainability:** If awarded, explain how the project will be sustained once the Section 5310 Agreement or funding expires.

Answer:

19. **Project scale:** Describe how this project would scale if only partially funded. Explain feasible adjustments to project scope, such as phasing capital elements (*e.g., number of vehicles, facility components, ADA-priority features*) or modifying service delivery (*e.g., reduced service area, fewer operators, or prioritizing specific trip types*). Outline the most realistic and operationally viable approach to scaling the project while maintaining score service outcomes.

Important: STA acknowledges that ADA vehicle projects cannot realistically be “scaled down” and applicants may enter a N/A for question.

Answer:

VII. Additional Information

20. **Other details/updates:** Share any additional project details, clarifications, or changes made to the project since submitting the Preliminary Proposal, that are not covered above.

Answer:

VIII. Finishing Up

21. **Attachments Checklist:** Include the following items with your Final Project Application.

Important: Application received by the due date without required attachments will not be accepted.

Required Documents	Notes
Complete Final Application	Include all project specific information
Title VI Program	Provide current Program or submit a Program
Active SAM.gov Registration	Must have valid UEI and active SAM registration by final submission
Local Match Certification Form	Identify source of non-federal matching funds
Project Budget	Project budget worksheet
Logic Model or Business Plan	If requested by STA
Certification and Assurances	Attach all project specific FTA required certification and assurances

IX. Applicant Certification

The Applicant affirms the individual executing the application has been granted the authority to do so, and by their signature, affirms the Applicant will comply with the terms and conditions of this application.

Printed Name _____ Title _____

Authorized Signature _____ Date _____

Attachment A

List of Eligible Capital Projects for Section 5310 Funding

- 1) **Rolling Stock and Related Activities for Section 5310-Funded Vehicles.**
 - a) Acquisition of expansion or replacement buses or vans, and related procurement, testing, inspection, and acceptance costs
 - b) Vehicle rehabilitation or overhaul
 - c) Preventive maintenance
 - d) Radios and communication equipment
 - e) Vehicle wheelchair lifts, ramps, and securement devices.
- 2) **Passenger Facilities Related to Section 5310-Funded Vehicles.**
 - a) Purchase and installation of benches, shelters, and other passenger amenities.
- 3) **Support Facilities and Equipment for Section 5310-Funded Vehicles.**
 - a) Extended warranties that do not exceed the industry standard
 - b) Computer hardware and software
 - c) Transit-related intelligent transportation systems (ITS)
 - d) Dispatch systems
 - e) Fare collection systems.
- 4) **Lease of Rolling Stock or Related Equipment.** Requirements regarding leases are governed by the Uniform Guidance, 2 CFR Part 200. Please see FTA Circular 5010.1 for a summary of requirements related to leasing.
- 5) **Acquisition of Transportation Services under a Contract, Lease, or Other Arrangement.** This may include acquisition of ADA complementary paratransit services when provided by an eligible recipient or subrecipient as defined in Chapter Both capital and operating costs associated with contracted service are eligible capital expenses. User-side subsidies/vouchers for alternatives to public transportation are considered one form of eligible arrangement. All services must meet all Federal civil rights requirements, including those requiring equivalent service to persons with disabilities, particularly wheelchair users, in the provision of demand-responsive service and any ADA title II program access responsibilities administered by the U.S. Department of Justice. Funds may be requested for contracted services covering a time period of more than one year. The capital eligibility of acquisition of services as authorized in 49 U.S.C. 5310(b)(4) is limited to the Section 5310 program.
- 6) **Support for Mobility Management and Coordination Programs among Public Transportation Providers and Other Human Service Agencies Providing Transportation.** Mobility management is an eligible capital cost. Mobility management techniques may enhance transportation access for populations beyond those served by one agency or organization within a community. For example, a nonprofit agency could receive Section 5310 funding to support the personnel costs of sharing services it provides to its own clientele with other seniors and/or individuals with disabilities and to coordinate usage of vehicles with other nonprofits; however, operating costs of service are excluded. Mobility management is intended to build coordination among existing public transportation providers and other transportation service providers with the result of expanding the availability of service.
 - a) The promotion, enhancement, and facilitation of access to transportation services, including the integration and coordination of services for individuals with disabilities, seniors, and low-income individuals.
 - b) Support for short-term management activities to plan and implement coordinated services.
 - c) The support of State and local coordination policy bodies and councils.
 - d) The operation of transportation brokerages to coordinate providers, funding agencies, and passengers.
 - e) The provision of coordination services, including employer-oriented transportation management organizations' and human service organizations' customer-oriented travel navigator systems and

neighborhood travel coordination activities, such as coordinating individualized travel training and trip planning activities for customers.

- f) The development and operation of one-stop transportation traveler call centers to coordinate transportation information on all travel modes and to manage eligibility requirements and arrangements for customers among supporting programs.
- g) Operational planning for the acquisition of intelligent transportation technologies to help plan and operate coordinated systems inclusive of geographic information systems (GIS) mapping; global positioning system technology; coordinated vehicle scheduling; dispatching and monitoring technologies; technologies to track costs and billing in a coordinated system; and single smart customer payment systems. (Acquisition of technology is also eligible as a standalone capital expense).

List of Eligible Operating Projects for Section 5310 Funding

Public transportation projects that exceed the requirements of the ADA.

1) Enhancing paratransit beyond minimum requirements of the ADA

- a. Expansion of paratransit service parameters beyond the three-fourths mile required by the ADA
- b. Expansion of current hours of operation for ADA paratransit services that are beyond those provided on the fixed-route services
- c. The incremental cost of providing same day service
- d. The incremental cost (if any) of making door-to-door service available to all eligible ADA paratransit riders but not on a case-by-case basis for individual riders in an otherwise curb-to-curb system
- e. Enhancement of the level of service by providing escorts or assisting riders through the door of their destination
- f. Acquisition of vehicles and equipment designed to accommodate wheelchairs that are larger than 30" x 48" and/or weigh more than 600 pounds when occupied and labor costs of aides to help drivers assist passengers with oversized wheelchairs. This would permit the acquisition of lifts with a larger capacity modification to lifts with a 600-pound design load, and the acquisition of heavier duty vehicles for paratransit and/or demand-response service in order to accommodate lifts with a heavier design load
- g. Installation of additional securement locations in public transit buses beyond minimum ADA requirements.

2) Feeder Services

- a. Accessible "feeder" service (transit service that provides access) to commuter rail, commuter bus, intercity rail, and intercity bus stations, for which complementary paratransit service is not required under the ADA.

Public Transportation Projects that improve access to fixed-route service and decrease reliance by individuals with disabilities on ADA-complementary paratransit service

1) Making Accessibility Improvements to Transit and Intermodal Stations Not Designated as Key Stations.

- a. Improvements for accessibility at existing transportation facilities that are not designated as key stations established under 49 CFR 37.47, 37.51, or 37.53 and that are not required under 49 CFR 37.43 as part of an alteration or renovation to an existing station, so long as the projects are clearly intended to remove barriers that would otherwise have remained. Section 5310 funds are eligible to be used for accessibility enhancements that remove barriers to individuals with disabilities so they may access greater portions of public transportation systems such as fixed-route bus service, commuter rail, light rail, and rapid rail. This may include:
- b. Building an accessible path to a bus stop that is currently inaccessible, including curb cuts, sidewalks, accessible pedestrian signals, or other accessible features
- c. Adding an elevator or ramps, detectable warnings, or other accessibility improvements to a non-key station that are not otherwise required under the ADA
- d. Improving signage or wayfinding technology
- e. Implementation of other technology improvements, including ITS, that enhance accessibility for people with disabilities.

2) Travel Training

- a. Training programs for individual users on awareness, knowledge, and skills of public and alternative transportation options available in their communities. This includes travel instruction and travel training services.

Public Transportation projects that provide alternatives to public transportation that assist seniors and individuals with disabilities with transportation.

1) Purchasing vehicles to support accessible taxi, TNC, ride-Sharing, and/or vanpooling programs.

- a. Section 5310 funds can be used to purchase and operate accessible vehicles for use in taxi, TNC, ride-sharing, and/or vanpool programs provided that the vehicle meets the same requirements for lifts, ramps, and securement systems specified in 49 CFR Part 38, subpart B, at a minimum, and permits a passenger whose wheelchair can be accommodated pursuant to Part 38 to remain in their personal mobility device inside the vehicle.

2) Supporting the Administration of and Expenses Related to Voucher Programs for Transportation Services Offered by Human Service Providers.

- a. This activity is intended to support and supplement existing transportation services by expanding the number of providers available or the number of passengers receiving transportation services. Vouchers can be used as an administrative mechanism for payment of alternative transportation services to supplement available public transportation. The Section 5310 program can provide vouchers to seniors and individuals with disabilities to purchase rides, including: (a) mileage reimbursement as part of a volunteer driver program; (b) a taxi trip; or (c) trips provided by a human service agency. Providers of transportation can then submit the voucher for reimbursement to the recipient

3) For payment based on predetermined rates or contractual arrangements.

- a. Transit passes or vouchers for use on existing fixed-route or ADA complementary paratransit service are not eligible. Vouchers are an operational expense which requires a 50/50 (Federal/local) match.

4) Supporting Volunteer Driver and Aide Programs.

- a. Volunteer driver programs are eligible and include support for costs associated with administration; management of driver recruitment; safety; background checks; scheduling; coordination with passengers; related support functions; mileage reimbursement; and insurance associated with volunteer driver programs. The costs of enhancements to increase capacity of volunteer driver programs are also eligible. FTA encourages communities to offer consideration for utilizing all available funding resources as an integrated part of the design and delivery of any volunteer driver/aide program.

Section 5310 Final Grant Application Scoring Criteria

SECTION I: Risk Assessment			SECTION II TOTAL: /10
Assigned Risk Classification. <i>(This rating is based upon the STA's review of the agency overall risk in managing federal funds and meeting deliverables for the FTA Section 5310 program.)</i>			
New Applicant			COMMENTS
0 - 3.21	3.57 - 6.79	7.41 - 10	
Subrecipient			Score: /10
0 - 3.25	3.5 - 6.5	6.75 - 10	
<p>Low Risk - Agency Makes a consistent and concerted effort to comply with program requirements. Needs little to no follow-up to remain in compliance.</p>	<p>Medium Risk - Agency generally complies with program requirements but sometimes misses deadlines. Agency may lack internal controls, or high 5310 grant backlog. Needs occasional follow-up to remain in compliance.</p>	<p>High Risk - The agency presents significant compliance or capacity concerns (e.g., unresolved/material audit findings, limited experience administering FTA Section 5310 awards, inadequate staffing/systems, or substantial grant backlog) and would require heightened oversight/technical assistance and may be removed from funding consideration</p>	

Section II: Submission Completeness			ALL SECTIONS TOTAL: /10
1. Are all questions answered, and does the content of the answer provide sufficient background when applicable?			
UNSATISFACTORY 0-1 pts	SATISFACTORY 2-3 pts	EXCELLENT 4-5 pts	COMMENTS
One or more questions were missed or incomplete.	All questions answered, content of answers provide satisfactory background when applicable.	All questions were answered, contents of answers provide significant background where applicable.	Score: /5
2. Were all required attachments submitted in final application?			
UNSATISFACTORY 0-1 pts	SATISFACTORY 2-3 pts	EXCELLENT 4-5 pts	COMMENTS
One or more items missing.	One or more items incomplete.	All attachments provided and complete.	Score: /5

SECTION III: Regional Transportation Needs			SECTION II TOTAL: /15
3. Are the needs and strategies identified, and does the project clearly address how the needs and strategies will be met? Q3 & Q4			
UNSATISFACTORY 0-5 pts	SATISFACTORY 6-10 pts	EXCELLENT 11-15 pts	COMMENTS
The project suggests no specific needs/strategies.	The project meets three or more needs and strategies and identified how it will meet each strategy/need.	The project suggests five or more needs and strategies identified and how it will meet each strategy/need.	
			Score: /15

SECTION IV: Proposed Service Improvements			SECTION III TOTAL: /15
4. Are the barriers identified, and does the project clearly address how they will be overcome? Q1 & Q2			
UNSATISFACTORY 0-5 pts	SATISFACTORY 6-10 pts	EXCELLENT 11-15 pts	COMMENTS
Barriers are not identified.	The project generally identifies transit barrier(s) but does not fully explain how they will be overcome.	Project addresses significant or unique barriers by offering tailored or specialized transportation options for program participants.	
			Score: /15

SECTION V: Financials			SECTION VI TOTAL: /20
5. Is the local match for this project secured? Q10			
UNSATISFACTORY 0 pts	SATISFACTORY 1-3 pts	EXCELLENT 4-5 pts	COMMENTS
The local match for this project is not secured.	The local match is expected to be secured prior to the project start date.	The local match for this project is secured.	
			Score: /5
6. Does the budget narrative clearly describe each line item and explain the basis for its cost using estimates or data?			
UNSATISFACTORY 0 pts	SATISFACTORY 1-3 pts	EXCELLENT 4-5 pts	COMMENTS
Budget items unclear, missing quotes and data.	Budget items are clearly described and supported by documentation.	Budget items are clearly described, supported by documentation and include methodology/ calculations.	
			Score: /5
7. Is there a clear and realistic sustainability plan once Section 5310 funding ends? Q18			
UNSATISFACTORY 0 pts	SATISFACTORY 1-6 pts	EXCELLENT 7-10 pts	COMMENTS
The project will not continue.	Project will continue only if Section 5310 funding is maintained.	Project has a clear plan to continue without Section 5310 funding.	
			SCORE: /10

SECTION VI: Performance Measures			SECTION IV TOTAL: /15
8. Review and assess the applicant’s methodology for tracking and calculating the number of individuals served and/or trips provided. Q10			
UNSATISFACTORY 0-5 pts	SATISFACTORY 6-10 pts	EXCELLENT 11-15 pts	COMMENTS
The methodology is not provided or wholly inadequate.	Methodology is somewhat clear but raises concerns about reliability or the applicant’s capacity to collect data.	Methodology is clear, reliable, and demonstrates the applicant’s ability to collect the required data.	
			Score: /15
SECTION VII: Management			SECTION V TOTAL: /15
9. Are project staffing needs addressed (e.g., are requested positions filled or is a plan in place to fill them)? Q12			
UNSATISFACTORY 0 pts	SATISFACTORY 1-3 pts	EXCELLENT 4-5 pts	COMMENTS
No positions are filled.	Only some positions are filled.	All required positions are filled.	
			Score: /5
10. Does the applicant demonstrate adequate experience with federal funds and grant compliance? Q13			
UNSATISFACTORY 0-3 pts	SATISFACTORY 4-6 pts	EXCELLENT 7-10 pts	COMMENTS
No prior experience.	Management team has experience providing transportation services but limited or no experience managing federal funds.	Management team has relevant experience and qualifications, including oversight of projects using federal funds.	
			Score: /10
Total		/100	