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| 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

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- a. Risk Assessment Form
  - 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.

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According to the Section 5310 FSRS Reporting Procedures, the Assistant Transit Planner shall enter the project information into the Federal Funding Accountability and Transparency Act Subaward Reporting System (FSRS) after the agreement is executed. This shall occur ***no later than the last day of the month following the date of agreement execution***. 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 20<sup>th</sup> day of the month following the end of the quarter. The quarterly progress report due dates will be January 20<sup>th</sup>, April 20<sup>th</sup>, and July 20<sup>th</sup> 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     |
|----------------------------------|------------|-----------|-----------|---------------|
| <b>Reporting Period</b>          | Oct - Dec  | Jan - Mar | Apr - Jun | July – Sep    |
| <b>Quarterly Report Due Date</b> | January 20 | April 20  | July 20   | Second Friday |
| <b>Annual Report Due Date</b>    | October 30 |           |           |               |

Subrecipient projects who request reimbursements will be required to submit Monthly Beneficiary Data Reports by the 20<sup>th</sup> 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

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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:

- 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 30<sup>th</sup> 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

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

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.

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

## 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/FAPIS regarding specified civil, criminal, or administrative proceedings is current and complete.

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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.

## 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)