

Spokane Transit Authority

Subrecipient Monitoring and Oversight Procedures

These procedures are for Spokane Transit to monitor subrecipients. Below is a list of checklists that are applicable to all subrecipient projects and checklists that are applicable depending on the type of project.

- Title VI – All projects (Appendix 1)
- DBE - All projects (Appendix 2)
- Construction – Construction only projects (Appendix 3)
- Vehicle procurement – Vehicle projects (Appendix 4)

Grant Application Phase

Grant Application Requirements for Subrecipients

- Depending on the requested funding amount the subrecipient must submit with the application signed certificates for suspension and debarment, lobbying and DBE. All subrecipients must sign the DBE and Title VI certification. Applicants submitting construction and vehicle procurement projects must also sign the Buy America certification.
- STA will review and verify that the subrecipient has adequate local and eligible match for the project. This can be done through review of the subrecipient's annual budget and/or single audit or a letter certifying that the local match is secured.
- STA will review applications to ensure that the subrecipient has the technical capacity to implement the project. This can be verified either by the thoroughness of the application or meeting with the applicants or review of previous experience.
- The subrecipient must provide the DUNS number and EIN for their organization during the application process (DUNS: [FTA C 9030.1E VI-10](#)).
- For vehicle purchase projects the vehicle size, type and fuel must be included in the application.
- A project budget is required to be submitted by the subrecipient at time of application.
- Projects that use in-kind or volunteer match the rate of reimbursement must be identified either in the project application phase, grant agreement or by a letter provided by the subrecipient.
- A subrecipient may request reimbursement for indirect costs associated with the project. The subrecipient must identify (yes or no) the use of an indirect expense in the project application phase, in the grant agreement or in a letter provided by the subrecipient. There are two eligible indirect cost reimbursement alternatives as listed below (2 CFR § 200.331),

- A negotiated indirect cost rate and cost allocation plan.
- De minimis indirect cost rate of up to 10% of the project direct cost.
- The subrecipient cannot exceed the match rate as authorized by FTA under the appropriate grant program.

Risk Assessment

- STA will conduct a risk assessment on each subrecipient during the application process to evaluate each subrecipient's risk of noncompliance with federal statutes, regulations and terms and conditions of the subaward as required by § 200.331 (6). The risk assessment results will determine the appropriate level of subrecipient monitoring.

Prior to Grant Award

System of Award Management (SAM)

- Prior to award of funds STA will verify in the System of Award Management (SAM) website that the subrecipient is not debarred.

Grant Agreement

Agreement Requirements

- Spokane Transit agrees to adopt the annual certifications and assurances on behalf of subrecipients. The requirements of the certifications and assurances are passed to the subrecipient through the agreement and grant requirements imposed.
- The agreement between STA and the subrecipient must include requirements to follow all Federal Transit Administration (FTA) clauses. Including as required by 2 CFR § 200.331 as follows:

Federal Award Identification.

- (i) Subrecipient name (which must match registered name in DUNS);
- (ii) Subrecipient's DUNS number (see §200.32 Data Universal Numbering System (DUNS) number);
- (iii) Federal Award Identification Number (FAIN);
- (iv) Federal Award Date (see §200.39 Federal award date);
- (v) Subaward Period of Performance Start and End Date;
- (vi) Amount of Federal Funds Obligated by this action;
- (vii) Total Amount of Federal Funds Obligated to the subrecipient;
- (viii) Total Amount of the Federal Award;
- (ix) Federal award project description, as required to be responsive to the Federal Funding Accountability and Transparency Act (FFATA);

- (x) Name of Federal awarding agency, pass-through entity, and contact information for awarding official,
- (xi) CFDA Number and Name; the pass-through entity must identify the dollar amount made available under each Federal award and the CFDA number at time of disbursement;
- (xii) Identification of whether the award is R&D; and
- (xiii) Indirect cost rate for the Federal award (including if the de minimis rate is charged per §200.414 Indirect (F&A) costs).

Post Grant Award /Execution of Grant Agreement

FSRS Reporting

- Spokane Transit will report the subawards in the Federal Funding Accountability and Transparency Act Subaward Reporting System (FSRS) once the agreements have been executed. This report is due by the end of the month after Spokane Transit makes the subaward (when a grant agreement is signed) (FTA C 9030.1E VI-11).
- FSRS reporting is also required for subrecipient vehicle purchase projects even when purchased from the Washington State contract (FTA C 9030.1E VI-11).

Equal Employment Opportunity (EEO)

- A full EEO program the subrecipient fulfills both of the following conditions:
 - A subrecipient employs both 100 or more transit-related employees and
 - Requests in excess of \$1 million in capital/operating assistance in federal funds the previous federal fiscal year or requests or receives in excess of \$250,000 in planning assistance. (FTA C 4704.1A page 1-3)
- An abbreviated EEO plan is required if the subrecipient fulfills both of the following conditions:
 - The subrecipient employs between 50-99 transit-related employees and
 - Requests or receives capital or operating assistance in excess of \$1 million in the previous Federal fiscal year or requests or receives planning assistance in excess of \$250,000. (FTA C 4704.1A page 1-3)

Drug and Alcohol

- If a subrecipient receives funding under 49 U.S.C. 5307, 5309 or 5311 and has safety sensitive positions (as defined by 49 CFR Part 655) conducting the work funded by the subaward then Drug and Alcohol Testing may be required (FTA C 9030.1E VII-7).
- Subrecipients and contractors are not required to have an on-going drug-free awareness program (Comprehensive Review Guide page 395 and FTA C 9030.1E VII-8).

DBE

- All subrecipients, Prime Subcontractors must sign the DBE certificate. Subcontractors of subrecipients must sign DBE certificates as well. Subrecipients must also identify and report contracted DBE firms to Spokane Transit. Please see more detail in the DBE checklist, Exhibit 2.

Title VI Requirements

Ongoing Title VI Requirements upon execution of Grant Agreement

- All applicants must sign a Title VI certification with their application. Please see more detail in the Title VI checklist, Exhibit 1.
- Subrecipients are expected to submit their Title VI Program to STA within 90 days after execution of the grant agreement (may be extended upon subrecipient and Spokane Transit approval). Reimbursements are not eligible until the Title VI Program is approved by STA.
- The subrecipient may choose to adopt STA's notice to beneficiaries, complaint procedures and complaint form, public participation plan, and language assistance plan where appropriate. The subrecipient can modify when necessary.

Charter

- If a subrecipient provides service for elderly, persons with disabilities and low-income individuals, this service is considered exempt from Charter.

Independent Audit Reports

- If the subrecipient expends over \$750,000 in federal funds in a calendar year, then the subrecipient is required to have an annual independent audit (2 CFR Part 200 Subpart F and OMB Circular A-133). STA will either request a copy of the audit or review during annual site visit.

Quarterly Reports

- The subrecipient is required to submit to Spokane Transit a milestone progress report and a financial report as detailed in the agreement. Below are the dates that these reports are due.

Federal Fiscal Year Quarterly Reporting				
Federal Quarter	Quarter 1	Quarter 2	Quarter 3	Quarter 4
Reporting Period	Oct. 1 - Dec. 31	Jan. 1 - Mar. 31	April 1 - June 31	July 1 -Sept. 31
Due Date	January 30th	April 30th	July 30th	October 30th

The FFR and MPR should discuss at a minimum, the status of the project including any issues, milestones, delays and financial updates.

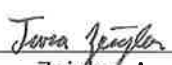
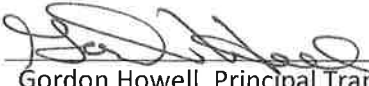
Invoice and Award Review

- The Principal Transit Planner and the Finance Department will review all requests for payment made by the subrecipient to confirm appropriate documentation is provided prior to reimbursement.
- Invoice must equal the request for payment with appropriate detail attached.
- Review type of expenses to verify that they are eligible for reimbursement.
- Review the amount of expenses to date in comparison with the awarded budget.
- Review and document volunteered services or in-kind contributions used as local match.
- STA will review indirect cost rate (negotiated or de minimis) during the invoice and site visit review periods to ensure the indirect rates are applied consistently.
- Spokane Transit conducts periodic site visits and desk reviews to ensure that the subrecipient remains in compliance with STA and federal requirements. Additional monitoring may be conducted if deemed necessary.

Grant Closeout

- Conduct either a site visit or desk review of the completed project file to make sure that all federal requirements are being followed.
- Review invoices submitted for reimbursement to ensure all the funds were expended to the subrecipient and to ensure that all local match requirements are met.

Adopted by:

 _____ Tara Zeigler, Assistant Transit Planner	1/2/2019 _____ Date
 _____ Gordon Howell, Principal Transit Planner	1/2/2019 _____ Date