

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

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## **Program Management Plan**

*Prepared by:*

**Planning and Grants Department**

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## Section 1 - Introduction

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

### Purpose and Content of the PMP

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

### PMP Review Process

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

PMP FTA Review Schedule	
Year	Submittal Status
2020	Most recent FTA approved PMP
2023	Submitted for FTA Approval
2024	Current Submission to FTA for Approval
2027	Upcoming PMP review

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

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

### Background and Program Goal

The Section 5310 grant program was established in 1975 (see FTA C 9070.1G Page I-6). The program

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

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

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

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

### Local Goals and Strategies

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

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

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

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

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

## Section 2 - Roles and Responsibilities

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

### STA's Responsibilities as a Designated Recipient

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

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

### STA's Responsibilities for 5310 Program Management

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

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

- Ensure at least 55% of Sections 5310 funds allocated to STA are spent on traditional 5310 projects by eligible subrecipients, where applicable.
- Certify that all projects are derived from a locally developed coordinated public transit- human services transportation plan.
- Certify that, to the maximum extent possible, services under Section 5310 are coordinated with transportation services from other federal departments and agencies.
- Submit reports as required by the FTA.
- Oversee project audit and closeout.

### Responsibilities of 5310 Subrecipients

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

### Role of Spokane Regional Transportation Council

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

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

### Regional Coordination

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

## Section 3 - Local Share and Funding Requirements

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

### Exceptions

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

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

clean fuel or alternative fuel vehicle-related equipment or facilities). FTA considers vehicle-related equipment to be equipment on and attached to the vehicle (C9070.1G pg. III-17).

4. STA may choose to contribute local match to offset subrecipient local match requirements for both Traditional and Other projects.

### Types of Local Match

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

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

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

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

### Project Geographic Area

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

## Section 4 - Eligible Subrecipients and Activities

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

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

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

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

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



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

## Eligible Activities

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

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

## Traditional 5310 Projects

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

Traditional 5310 Projects include, but are not limited to:

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

## Other 5310 Projects

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

“Other” 5310 Projects include:

- Accessibility improvements to transit and intermodal stations include building an accessible path, ramps, improving wayfinding measures and other technology improvements to enhance

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

## Section 5 - Annual Funding Distribution

### Program of Projects

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

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

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

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

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

Dec	Publish 5310 Program of Projects and submit to FTA
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Spokane Transit Authority (STA) provides a competitive selection process to distribute Section 5310 funds fairly and equitably within the Spokane UZA. Projects are selected based upon the ability to meet the regional transportation needs listed within the Coordinated Public Transit- Human Services Transportation Plan (HSTP) (link: [https://www.srtc.org/wp-content/uploads/2018/11/Final-2018-CPT-HSTP\\_Board-Approved\\_110818.pdf](https://www.srtc.org/wp-content/uploads/2018/11/Final-2018-CPT-HSTP_Board-Approved_110818.pdf)).

## Call for Projects

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

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

STA will provide technical assistance to applicants, as needed.

## Private Sector Participation

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

## Application Process

Applications submitted after the Call for Projects deadline will not be considered.

## Preliminary Proposal Eligibility Review and Risk Assessment

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

## Eligibility Review

The eligibility review is reflected in the following criteria:

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

### Risk Assessment

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

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

### Final Project Applications – Intake Review

After an application is deemed eligible in the preliminary proposal eligibility review the application will then be reviewed for completeness and 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,

- Final Project application- project costs, project information and levels of service, and 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, when applicable, 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 \$750,000 or more in federal funds per year
- Signed certifications, including:
  - Lobbying certification
  - Title VI Certification
  - Suspension & Disbarment certification
  - DBE certification, if applicable
  - Buy America certification, if applicable
- Current Title VI Plan or plan from agency to develop and submit a Title VI Plan, that meets federal requirements as determined by STA, within 90 days of the executed agreement, signed by an authorized official from the agency (e.g., CEO or Board Member)
- Risk Assessment Questionnaire and policies, where applicable:
  - Accounting Policy/Cash Management (2 CFR 200.302)
  - Internal Controls (2 CFR 200.303)
  - Travel Policy (2 CFR 200.474)
  - Procurement Policy (2 CFR 200.318)
  - Compensation (2 CFR 200.430)
  - Conflict of Interest Policy (2 CFR 200.112)
  - Equipment and Inventory Records (2 CFR 200.313)
- Current cost allocation plan, (if applicable for operating funds), approved by Federal transit

Administration and the applicant's cognizant agency within the last year.

- Applicants who do not have a current federally approved indirect cost, may choose to use the 10% de minimis rate.

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

### Application Scoring

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

- Risk Assessment- 10 Points
  - Are all questions answered and does the content of the answer provide sufficient background when applicable? (10 points)
- Application Completeness- 10 points
  - Are all questions answered and does the content of the answer provide sufficient background when applicable? (3 points)
  - Were all required attachments submitted in final application? (2 points)
  - Is the local match for this project secured? (2 points)
  - Are line items in the budget table clearly described in the budget narrative, including the basis for each cost (cost estimates, quotes, actual data, etc.)? (3 points)
- Regional Transportation Needs- 10 points
  - What specific needs/ strategies from the Spokane County Coordinated Public Transit-Human Services Transportation Plan (HSTP) will this project meet? (10 points)
- Proposed Service Improvements- 10 points
  - What barriers will this project work to overcome in providing transportation options to seniors and individuals with disabilities? (10 points)
- Performance Measures- 20 points
  - Please provide a detailed description of how this project will reduce transportation gaps and enhance service for seniors and individuals with disabilities (10 points)
  - Review the methodology for tracking and calculating individuals served (10 points)
- Management- 15 points
  - Are all positions in your requested project currently filled? (5 points)
  - Briefly describe your agency's experience with State or Federal funds (5 points)
  - What is the agency's plan to sustain this project after the Section 5310 funding expires? (5 points)
- Financials- 15 points
  - Is this project scalable? If so, does the applicant offer scope, and budget changes? (5 points)

### Awarding Funds

Once scoring is completed, STA planning staff will prepare a summary sheet for the STA Planning and Development (P&D) Committee to review. The P&D Committee will submit a recommendation to the full STA Board of Directors for approval. The STA Board of Directors will review and approve the award of

projects to Section 5310 subrecipients. STA reserves the discretion to award less funding than requested based on scoring results and funding recommendations.

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

### FTA Concurrence

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

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

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

## Section 6 - Agreement Development

### Agreements

Once the STA Board approves and awards subrecipients with 5310 funds, subrecipients will receive an award letter. STA Planning staff will use the Budget Narrative Worksheet submitted with the application to draft a Budget Narrative and Scope of Work (SOW) for the subrecipient to review and approve. Significant budgetary discrepancies could result in STA requesting the applicants budget table for reference. With FTA’s approval of the Section 5310 application, STA Planning staff will then begin working with the STA Contracts Compliance Specialist to draft an operating and/or capital agreement which will include the SOW 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 (C9070.1G Pg. VIII-11).

1. Applicants must comply with all federal requirements, failure to do so will render a project ineligible for FTA financial assistance.
1. Reimbursement of pre-award costs is not guaranteed, and to be eligible for subsequent reimbursement, the project must have met all FTA statutory, procedural, and contractual requirements.
2. Pre-award funds are subject to the availability of funds and grant award.

3. Pre-award authority is triggered for certain projects when the award is approved by the Board and the following conditions are met:
  - a. STA has given approval for the subrecipient to use pre-award authority. Approval can be given through email to the subrecipient.
  - b. 5310 projects must be in the current annual STIP
  - c. 5310 apportionment must be published in Federal Register
  - d. The project must be categorically exempt as defined by FTA (mobility management and operating)
  - e. The subrecipient must be considered active under SAM and in 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 (FSRS)

FTA requires that recipients submit a report about each award over \$30,000 by the end of the month following the date of an executed agreement. Once STA submits an initial report, revisions can be made to add additional subawards or to change data previously submitted to reflect adjustments in subawards.

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

- Name of entity receiving subaward Doing Business As (DBA) Name
- Unique Entity Identifier Number
- Amount of subaward
- Funding Agency
- Program Source
- Subaward number (Note: assigned by recipient)
- CFDA number (Note: The same CFDA associated with the FTA award)
- Place of performance (including congressional district)
- Total compensation and names of top five executives, if required (Note: Not typically required, with thresholds of \$25 million and 80 percent of total revenue coming from federal funds)
- Award title descriptive of the purpose of the funding action
- Location of the entity (including congressional district)
- Unique identifier of the entity and its parent

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

## Section 7 - Program Management



Spokane Transit Authority will develop and execute grant agreements with each subrecipient selected to receive funding from the Section 5310 program. The amount, type (capital, operating, or planning), and the period of performance (term) will be included. Any expenses incurred 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 Procedures (**ATTACHMENT C**) and Section 5310 Subrecipient Billing Standard Operating Procedures (**ATTACHMENT D**).

## Procurement

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

## Financial Management

Spokane Transit Authority complies with all applicable standards set forth in 2 CFR 200 and guidance in the FTA "Grant Management Guidelines" FTA C 5010.1 (Circular 5010-1E – as revised on March 21, 2017) 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 to be used first for program-related needs for which the grant is developed, and then to meet other transportation needs of other federal programs or project needs, if they do not interfere with the project activities originally funded. If any vehicles are to be removed from service prior to the end of its useful life, the subrecipient must notify Spokane Transit prior to doing so.

### Useful Life

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

### Buses

1. Large, heavy-duty transit buses including over-the-road buses (approximately 35' – 40' or larger



including articulated buses):

At least 12 years of service or an accumulation of at least 500,000 miles.

2. Small size, heavy-duty transit buses:

At least 10 years or an accumulation of at least 350,000 miles.

3. Medium-size, medium-duty transit buses:

At least seven years or an accumulation of at least 200,000 miles.

4. Medium-size, light-duty transit buses:

At least five years or an accumulation of at least 150,000 miles.

#### Light Duty Vehicles (Vans)

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

#### Vehicle Title

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

#### Maintenance and Disposition

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

The subrecipient maintains responsibility for the repairs and maintenance of the vehicles and any extended or additional warranties must be reported to STA. This includes warranty claims, warranty repairs, proof of claim submittal(s) to manufacturers, and any steps taken to follow up on unpaid claims. STA currently provides oversight for subrecipient vehicles purchased with Section 5310 federal funding by conducting annual vehicle inspections and desk reviews, and quarterly progress reports. This monitoring tracks vehicle condition, maintenance, useful service life, miles, hours, and unduplicated trips provided.

#### National Transit Database (NTD) Reporting

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

#### Accounting Systems

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

The subrecipient must agree to retain all data, documents, reports, records, contracts, and supporting

materials relating to the project throughout the course of the grant and for a period of three years after the date of the final expenditure report submission to FTA. This information may be accessed by the designated recipient, U.S. Secretary of Transportation, the Comptroller General of the United States, and, to the extent appropriate, the State, or its authorized representatives.

## Audit

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

## Administrative Costs – STA & Subrecipients

### Spokane Transit Authority

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

Examples of eligible administrative expenses include:

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

### Subrecipient Administrative Costs

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

Subrecipients must identify the type of indirect costs they will be using for the project. Subrecipients will indicate whether they are using a federally approved indirect cost plan or a 10% de minimis rate allowed under 2 CFR Part 200. If subrecipients select to use the 10% de minimis rate option, they must indicate that they have never used a federally approved rate. STA will not accept indirect cost allocation plans that are not approved, in writing, by a federal agency. 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.

### Returned Funds

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

### Subrecipient Project Closeout

The Assistant Transit Planner will have ninety (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 90 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. (C9070.1G Pg. VI-15)

Grant closeout procedures:

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

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

budget require prior approval from STA.

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

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

### FTA Performance Measures

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

For “Traditional” Section 5310 Projects:

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

For “Other” Section 5310 Projects:

1. “Service Improvements: Increases or enhancements related to geographic coverage, service quality, and/or service times that impact availability of transportation services for seniors and individuals with disabilities as a result of other Section 5310 projects implemented in the current reporting year.”
2. “Physical Improvements: Additions or changes to physical infrastructure (e.g., transportation facilities, sidewalks, etc.), technology, and vehicles that impact availability of transportation services for seniors and individuals with disabilities as a result of other Section 5310 projects implemented in the current reporting year.”
3. “Ridership: Actual or estimated number of rides (as measured by one-way trips) provided for seniors and individuals with disabilities as a result of other Section 5310 projects implemented in the current reporting year.”
4. “Quarterly Progress Reports: Quarterly progress reports shall be submitted for the duration of the Agreement period and STA will provide subrecipients a template.”

## Section 9 - Civil Rights and ADA Reporting

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

compliance efforts. STA program staff will use the Title VI Checklist to ensure that Title VI Plans meet all requirements.

### Title VI Plan Requirements

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

### Title VI Plan Contents

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

1. A copy of the subrecipient's public notice that indicates they comply with Title VI and informs members of the public of their protections against discrimination afforded to them by Title VI.
  - a. Include a list of locations where the notice is posted.
  - b. Include Safe Harbor languages.
2. A copy of the recipient's instructions to the public regarding how to file a Title VI discrimination complaint, including a copy of the complaint form.
3. A list of any public transportation-related Title VI investigations, complaints, or lawsuits filed with the recipient since the time of the last submission.
  - a. This list should include only those investigations, complaints, or lawsuits that pertain to allegations of discrimination on the basis of race, color, and/or national origin in transit-related activities and programs and that pertain to the recipient submitting the report, not necessarily the larger agency or department of which the recipient is a part.
4. Most recent census data to identify demographics of service area.
  - a. Include information on minority, language spoken at homes, and income.
5. A public participation plan that includes an outreach plan to engage minority and Limited English Proficient (LEP) populations, as well as a summary of outreach efforts to low-income, LEP, and minority populations made since the last Title VI Program submission. A subrecipient's targeted public participation plan for minority populations may be part of efforts that extend more broadly to include other constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.
6. A copy of the recipient's plan for providing language assistance to persons with limited English proficiency, based on the DOT LEP Guidance.
  - a. Include four factor analysis, how notice will be provided, how the plan will be monitored and updated, and how employees are trained to provide assistance.
7. Subrecipients that have transit-related, non-elected planning boards, advisory councils or

committees, or similar bodies, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees or councils.

- a. Include a description of efforts to encourage the participation of minorities on these planning bodies.
8. If the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.
9. A copy of Board meeting minutes, resolution, or other appropriate documentation showing the Board of Directors or appropriate governing entity or officials responsible for policy decisions reviewed and approved the Title VI Program.
10. Additional information as specified in chapters IV, V, and VI, depending on whether the recipient is a fixed route transit provider, a State, or an MPO.

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

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

- **Clauses:** STA will include federal civil rights program clauses in all applicable agreements.
- **DBE Program:** DBE clauses will be included in all subrecipient agreements (along with any third party contracts the subrecipient will enter into as part of the grant project). If a DBE is used for a subrecipient's project, STA will include DBE information in STA's report submission to the FTA. If the subrecipient awards a contract that has a DBE participant, STA will review the subrecipient's certified payrolls, affidavit of wages paid and also prompt pay for DBEs. 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.
- **EEO Program:** STA will require that any subrecipients that receive 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. The program should be compliant with all FTA general requirements. In addition, STA will also require each subrecipient to cooperate with STA in investigations, complaints, and lawsuits.

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

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

- FTA Circular 4703.1 “Environmental Justice Policy Guidance for Federal Transit Administration Recipients.”
- U.S. DOT Order to Address Environmental Justice in Minority Populations and Low- Income Populations

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

## Section 10 - Other Provisions

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

### Transfer of Funds

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

### Environmental Protection

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

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

### Buy America

49 U.S.C. 5323(j) provides that, with exceptions, federal funds may not be obligated for public transportation projects unless steel, iron, and manufactured products used in such projects are produced in the United States. Buy America requirements apply to all purchases, including materials or supplies funded as operating costs, if the purchase exceeds the threshold for small purchases (currently \$150,000). Spokane Transit Authority will conform to FTA regulations, 49 CFR part 661, and any amendments thereto.

### Pre-award and Post-delivery Reviews

The Federal Transit Administration (FTA) requires grant recipients purchasing a certain number of revenue passenger rolling stock to undertake reviews of the rolling stock before the award of the contract and following delivery of the vehicles. The intention is to improve compliance with Buy America requirements, the grantee’s bid specifications, and Federal Motor Vehicle Safety Standards. The requirement to

undertake the pre-award and post-delivery reviews arises from 49 U.S.C. 5323(m) and is specified in FTA regulations at 49 CFR part 663. Compliance will be certified on STA's Annual List of Certifications and Assurances.

### Restrictions on Lobbying

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

### Prohibition on Exclusive School Transportation

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

### Drug and Alcohol Testing

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



## Attachments

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

ATTACHMENT A: Spokane Urbanized Area (UZA) Map  
ATTACHMENT B: Section 5310 Designated Recipient Authorization  
ATTACHMENT C: Subrecipient Monitoring and Oversight Procedures  
ATTACHMENT D: Section 5310 Subrecipient Billing Standard Operating Procedures  
ATTACHMENT E: Risk Assessment  
ATTACHMENT F: Preliminary Proposal  
ATTACHMENT G: Final Application  
ATTACHMENT H: Application Scoring  
ATTACHMENT I: Approval Routing Form  
ATTACHMENT J: Billing Ledger  
ATTACHMENT K: Monthly Beneficiary Data Report  
ATTACHMENT L: Quarterly Progress Report  
ATTACHMENT M: Local Match Certification

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

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



CHRISTINE O. GREGOIRE  
Governor



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NC  
JW

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 #:	1
Implementation Date:	11/1/2020
Last Revision Date:	3/25/2024

## Spokane Transit Authority Subrecipient Oversight & Monitoring Procedures

### Purpose

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

### Scope

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

### Prerequisites

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

### Responsibilities

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

### Grant Application Review Procedures

The 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,



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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 Application 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
  - 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.

## Grant Agreement Procedures

- 1.) 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.
- 2.) 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).
- 3.) 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.
- 4.) 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.
- 5.) Following approval of the draft agreement, the Contract Specialist will then route all agreements for execution.

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## 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.

## 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 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.***

EXAMPLE: Agreement execution date - October 14, 2024  
FSRS deadline – November 30, 2024

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 Plan/Procedures, or specific deliverables identified in the project scope of work (SOW).

## Reporting

Annual reports will include information required (9070.1G Page VI-17) for all projects under active and temporary FAINs including:

- Annual Program of Projects Status Report
- Milestone Progress Report

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- Federal Financial Reports
- Annual Report (Program Measures)

Reports will be prepared by the Assistant Transit Planner and approved and uploaded to [TrAMS by the Principal Transit Planner](#). Reports will be submitted by October 30<sup>th</sup> of each year.

Subrecipients will be required to submit Quarterly Progress Reports 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
Quarter Span	Oct - Dec	Jan - Mar	Apr - Jun	July – Sep
Quarterly 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 20<sup>th</sup> day of each month. This will be required to process any reimbursement request.

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.

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

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Monitoring reviews shall be conducted annually for all projects. 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 14 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.

### 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 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, 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.



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## Spokane Transit Authority

### Section 5310 Subrecipient Billing

### Standard Operating Procedures

#### Purpose

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

#### Scope

Intended for use by STA staff directly involved in administering the FTA Section 5310 program. The order of priority shall follow the outline in this document (Billing Procedures, Reasonableness Criteria, Allowable Use of Funds, Criteria for Allowability, Billing Documentation, etc.).

#### Prerequisites

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

#### Responsibilities

- Assistant Transit Planner: will use this document as a guide to conduct daily activities to include reviewing billing invoices for eligibility, processing invoices, providing technical assistance to subrecipients, and other duties as assigned.
- Principal Transit Planner: will keep this SOP up-to-date and current for use, review and 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:

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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 'Section 5310 Project Billing 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).
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 Section 5310 Project Billing Workbook (specifically, the

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Budget Narrative) for costs that are eligible for reimbursement.

2. Any modifications to a grant award that does not change the overall award may be requested and approved by STA.
3. Be familiar with the allowability of cost provisions of 2 CFR Part 200 Subpart E – Cost Principles, particularly:
  - a. The list of specifically unallowable costs such as alcoholic beverages, bad debts, contributions, fines, and penalties, lobbying, etc.
  - b. Any costs requiring advance approval from the FTA in order to be allowable in accordance with §200.407.

## Criteria for Allowability

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

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

1. Verify that the expenses have been determined to be allowable under the terms of the executed agreement and/or 2 CFR Part 200 Subpart E – Cost Principles (see Criteria for Allowability below).
2. Verify that the reimbursement directly supports activities listed in the Scope of Work of the executed agreement and the progress report.
3. Verify that the invoices included in the reimbursement request are for specific line items included in the approved Section 5310 Invoice and Budget Reporting Workbook and Budget Narrative.
4. Verify that a general ledger account has been established in the subrecipient's chart of accounts to reflect the categories of allowable costs identified in the executed agreement.
5. Verify that any items of miscellaneous income or credits (including the subsequent write-offs of uncashed checks, rebates, refunds, and similar items) shall be reflected as reductions in allowable expenditures - if the credit relates to charges that were previously reimbursed.
6. Verify match contributions are correct and correspond with prior written confirmation (source and amount).
7. Verify there is no consistent over spending 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 a meeting with 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. A Completed Approval Routing Form which shall include:
    - i. Project Name & Type:
    - ii. Contract Term:
    - iii. FTA Award # (FAIN):
    - iv. Project String
    - v. Federal Match %:
    - vi. Subrecipient Match %:
    - vii. Other Match %:
    - viii. Indirect Cost Rate (ICR) %:
    - ix. ICR Approval Date:
    - x. Allowable Costs
    - xi. Approved Line Items

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- xii. Monthly Beneficiary Data Report
- xiii. Budget Fluctuations
- xiv. Backup Documentation
- xv. Project Billing Ledger
- xvi. Credits Included
- xvii. Project Summary
- xviii. Amendment History (If Applicable)
- xix. Total Request for Reimbursement
- b. Attachments
  - i. Subrecipient Signed Section 5310 Project Billing Workbook
  - ii. Section 5310 Project Billing Ledger
  - iii. Invoice
  - iv. Legible backup documentation for all allowable expenses incurred during the reporting period
  - v. Monthly Beneficiary Data Report
  - vi. Billing Ledger
- 10. Include Verifications which shall include:
  - a. Received Date Stamp (on Reporting Workbook)
  - b. Certification Stamp (with Assistant Transit Planner Initials and Date)
  - c. Email correspondence between STA and subrecipient documenting invoice discrepancies and their resolution (if applicable)
- 11. Combine the Approval Routing Form, Invoice & Budget Reporting Workbook, invoice, backup documentation, and billing ledger.
- 12. The Assistant Transit Planner will sign and enter the billing packet into Tyler Munis for approval.

## Billing Documentation

Requests for reimbursement shall be signed by an authorized official of the subrecipient organization using the Section 5310 Invoice and Budget Reporting Workbook provided to the subrecipient by Spokane Transit Authority. Subrecipients will be required to submit a written explanation to address any line items in the Invoice & Budget Reporting Workbook that are not within 10% of the month's variance. 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](mailto:Section5310@spokanetransit.com) and will include,

Email subject line Project Name Month Year Invoice

- a. Reimbursement request and all legible supporting documentation consolidated into one PDF
- b. Invoice PDF named Project Name\_Month\_Year\_Invoice

The invoice PDF will include supporting documentation as follows:

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

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

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

Equipment – Copies of invoices.

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

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

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

## (Local) Cost Sharing and Matching Funds Requirements

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

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

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

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

## Subrecipient Invoice Processing & Notices

Requests for reimbursement will be directed to the Assistant Transit Planner for eligibility review and internal processing. Payment requests shall be submitted by the 20<sup>th</sup> of the month – unless prior written approval is provided by STA.

The Assistant Transit Planner will notify the subrecipient, in writing, of any discrepancies within five (5) business days of invoice submittal by subrecipient. 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

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of submittal, payment, notices, etc.) in the Section 5310 Invoice Tracking Sheet by Fiscal Year/Subrecipient/STA Grant Agreement.

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

Attachments (Incorporated by Reference):

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



## 2024 Section 5310 Risk Assessment Questionnaire

Organization Name: \_\_\_\_\_

### I. GENERAL ASSESMENT

#### 1. Organization Experience with Similar Project(s):

Response (X)

5 + years	
3-5 years	
0-3 years	

Comments: If applicable, were the projects completed on time and within budget?

#### 2. Organization experience with State or Federal Funds:

5 + years	
3-5 years	
0-3 years	

Comments:

#### 3. Organization experience with FTA Grant program(s):

5 + years	
3-5 years	
0-3 years	

Comments:

#### 4. Management or staff turnover or reorganization that affects this program:

No turnover or reorganization	
Little turnover or reorganization	
Significant turnover or reorganization	

Comments:

#### 5. Average experience of project staff and management in the current position:

5+ years	
2-5 years	
Less than 2 years	

Comments:

#### 6. Experience of staff and management with the FTA program(s):

5+ years	
2-5 years	
Less than 2 years	

Comments: Please list specific experience.

#### 7. Familiarity with the program:

Have managed/conducted many similar programs in the past (5+ years' experience)	
Have managed/conducted a few similar programs	
Have minimal or no experience with this type of program	

Comments:

**8. Effective written procedures and controls for this program:**

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):	
Formal/written and distributed to employees	
Informal policies and controls	
No policies or controls	

Comments: please attach written procedures.

**III. LEGAL ASSESSMENT****1. Does the organization have or previously had any suit(s) filed against them within the last 5 years? (such as EEO, DBE, contractor suing for payment)**

No previous or current suits	
Has previously had a lawsuit	
Has a lawsuit	

Comments: Please provide an explanation of each historical and/or active suit, the finding(s) of the suit, and the prevailing party(ies).

**2. Organization staff that have been arrested, convicted of a felony or are currently under criminal investigation:**

No staff arrested, convicted or currently under criminal investigation	
Has staff that has been arrested, convicted or is currently under criminal investigation	

Comments:

**3. Does the organization have any violations of Federal criminal law involving fraud, bribery or gratuity violations potentially affecting the Federal award?**

No	
Yes	

Comments: If yes, provide supporting documentation.

**IV. MONITORING/AUDIT ASSESSMENT****1. Past Audit findings from the A-133 Audit or any Internal Audits:**

No material findings	
Some findings, not material	
Has material findings	

Comments: If applicable, please discuss how corrective actions were handled for finding(s). Include timeline taken to get findings closed.

**2. Have there been any previous audit findings (i.e. other comprehensive audit, Internal Audit)?**

No material findings	
Some findings, not material	
Has material findings	

Comments:

**3. Has STA previously requested you address any performance issues with previous projects??**

Yes	
No	



Comments: What were the corrective actions taken to address the finding.

## V. FINANCIAL SYSTEMS ASSESSMENT

- 1. Does the organization have a financial management system in place to track and record program expenditures (Examples: QuickBooks, Visual Bookkeeper, Peachtree, or a Customer Proprietary System)?**

Yes, has financial management system in place	
No financial management system in place	

Comments: Please list the system used and length of time in use.

- 2. Does the accounting system identify the receipts and expenditures of program funds separately for each award?**

Accounting system identifies receipts and expenditures of program funds separately for each award	
Accounting system identifies receipts and expenditures of program funds but does not separate for each award	
Accounting system does not identify receipts and expenditures of program funds	

Comments:

- 3. Does the organization have a time and accounting system to track time and expenditures by budget category?**

Yes, Organization has a time and accounting system to track time and expenditures by cost objective	
Organization has a time and accounting system but does not track time and expenditures by cost objective	
Organization does not have a time and accounting system to track time and expenditures	

Comments:

- 4. Does the organization maintain appropriate internal controls? (Reconciliation checks and balances are in place, duties are segregated, the final approval for payment is made by a different individual than the check/warrant signer)**

Yes	
No	

Comments:

## V. CAPITAL ASSET TRACKING

- 1. Has the organization leased any FTA funded equipment to private operators, other public entities, or non-profit organizations?**

No	
Yes, with prior written approval from FTA	
Yes, without prior written approval from FTA	

- 2. Explain the organization's control system to prevent and investigate loss, damage, or theft of property.**

Comments: If applicable, please attach written policy

Spokane Transit Authority

Federal Transit Administration Section 5310 Enhanced Mobility for  
Seniors and Individuals with Disabilities Funding

**Preliminary Proposal**

Project Title:

**Important:** *FTA funds require a large degree of dedication to detail and reporting, along with very specific requirements. Please review the documents associated with this call for projects to determine if your agency is able and willing to accept the terms and conditions provided.*

*Preliminary proposals are due by **5:00 p.m. on August 26, 2024.***

*Final project applications are due by **5:00 p.m. on September 23, 2024.***

*Late applications will not be accepted. Please send applications and copies of required documents to:*

*Spokane Transit Authority  
Attn: Emilio Bustos  
1230 W Boon Ave.  
Spokane, WA 99201*

*Or electronically to:  
[Section5310@spokanetransit.com](mailto:Section5310@spokanetransit.com)*

## 2024 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. There is approximately \$673,340 in Section 5310 federal funds and STA local funds available for this call for projects (see table below for specific grant sources and amounts).

Projects that are 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 (<https://www.srtc.org/human-services-transportation-plan/>). See Attachment A for a complete list of eligible capital projects.

Of the total 2024 apportionment funds available under Section 5310, a minimum of 55% must be spent on “Traditional” capital projects and maximum of 45% of funds can be spent on “Other” operating projects. In the event that there are no eligible applicants available to provide services, STA may certify this scenario to FTA. STA would then allocate available 5310 apportionments to fund contracted services.

2024 Call for Projects Funding Table

Funding Source	Amount Available
FY2024 Apportionment (Federal Match)	\$673,340
STA Local Match Contribution	\$236,000
<b>Total Funding Available</b>	<b>\$909,340</b>

Preliminary proposals are required and are generated for the purpose of gaining interest in the project with potential for being awarded Section 5310 funding, to determine initial project eligibility and perform an initial risk assessment. Preliminary proposals are due no later than. STA will provide an **informational meeting on 8/12/2024 via WebEx** to provide applicants the opportunity to ask questions about program and project eligibility requirements. STA will also provide **office hours every Wednesday from 9:00-10:30 AM** until the application due date for interested applicants to ask questions or receive technical assistance. Applicants may also request a one-on-one meeting with STA to ask questions and receive technical assistance with applications materials. Meeting information will be posted on the Spokane Transit Authority website at <https://www.spokanetransit.com/about-sta/section-5310-program>. If you need additional information about the WebEx informational meeting, please contact Emilio Bustos, Assistant Transit Planner at (509) 344-2609 or by email at [ebustos@spokanetransit.com](mailto:ebustos@spokanetransit.com). Individuals requesting accommodations are encouraged to contact Delana, Combs, Ombudsman at (509) 325-6094 at least 48 hours in advance of the meeting.

Final project applications are due by **Applications received after this date and time will not be considered. Incomplete project applications will not be considered.** Applications may be sent via USPS, UPS, or FedEx to: Emilio Bustos, Spokane Transit, 701 W Riverside Ave 1230 W Boone Avenue, Spokane,

WA 99201 or submitted electronically to [Section5310@spokanetransit.com](mailto:Section5310@spokanetransit.com). Mailed applications must be postmarked on or before 9/23/2024. Applications sent by fax will not be accepted; however, applications dropped off in person will be accepted.

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.

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#### Non-Discrimination Notice

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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.

## Section I: Agency Contact Information and Project Type

Legal Name of Agency:	
Address:	
Federal Tax ID Number:	
UEI Number (Unique Entity Identifier):	
WA UBI Number (Unified Business Identifier):	
Contact Person (for questions related to the application):	
Legal Contact Person (for agreement related questions):	
Phone Number:	
E-mail Address:	

1. Please identify your agency:

- ☐ Local Government/Municipal Corporation (approved by the State of Washington to provide human services transportation)
- ☐ Operator of public transportation services (private or publicly owned)
- ☐ Private, non-profit organization

2. Type of Application (For a complete list of eligible projects, see Attachment A):

- ☐ Traditional Project.  
Check the appropriate project type:
  - ☐ Purchase New ADA Accessible Vehicle (please complete sections below)
  - ☐ Acquisition of transportation services under a contract, including operating projects (must be competitively procured)
  - ☐ ADA Improvements such as, sidewalks, curb ramps, signage, etc.
  - ☐ Support for Mobility Management and Coordination Programs
  - ☐ Other eligible capital project, please list:
- ☐ Other Project (Projects must not duplicate existing service provided by Spokane Transit.)  
Check the appropriate project type:
  - ☐ Support for paid or Volunteer driver programs that provide transportation to seniors and/or people with disabilities.
  - ☐ Travel Training programs for riding fixed-route public transit, aimed at seniors or disabled individuals who currently rely on Paratransit or similar transportation services.
  - ☐ Other eligible operating project, please list:

## Section II: Project Costs

As a preliminary proposal, applicants may make reasonable adjustments to costs and requested amounts in the Final Project Application.

3. What is the estimated Total Project Cost (TPC) of this project? (TPC is calculated by adding your federal funding request + agency local match)

Funding Breakdown	
Federal Funding Request	\$
Applicant Agencies Local Match	\$
Total Project Cost	\$

4. What are this project's intended sources of local match? Use the table below to reflect all funding sources that will contribute to local match

Source	Description	Funding Term	Status

5. If your agency intends on using an indirect cost rate, please indicate the type below:

- ☐ Federally approved indirect cost plan (approval from cognizant agency)
- ☐ 10% de minimis rate (your agency does not have a federally approved rate)
- ☐ No indirect costs will apply to this project

If your agency will use an indirect cost rate, please identify the rate and total expenditure in the budget narrative. *(Please note that STA will **not** accept indirect cost allocation plans that are not approved in writing by a federal agency).*

### Section III: Project Information

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

7. If you are currently a recipient of Section 5310 funds and entered into an agreement with STA please provide the following information listed below.

Agreement #	
Agreement Term	
Amendment Term (If applicable)	
Federal %	
Local Match %	
STA Local Match (If applicable) %	
Balance Remaining on Agreement	

### Section IV: Risk Assessment

Please complete and submit the 2024 Section 5310 Risk Assessment Questionnaire along with your preliminary proposal. Spokane Transit will assess the level of risk for each subrecipient to identify if additional monitoring (or contract) to ensure compliance. The questionnaire does request the applicant to submit written procedures, if available, including:

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)

### Section V: Project Administration

New applicants who propose a new project or services and 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 ask the applicant to submit one or more supplemental documents with the Final Project Application. If you are a new 5310 applicant, please email Emilio Bustos at [ebustos@spokanetransit.com](mailto:ebustos@spokanetransit.com).



## Section VI: Finishing Up

Attachments Checklist: Please include the following items with your Final Project Application. (Applications received by the due date without required attachments will not be accepted).

- ☐ Complete Preliminary Proposal
- ☐ Risk assessment questionnaire and policies

## Applicant Certification

The Applicant affirms the individual executing this 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.

---

Authorized Signature	Date
----------------------	------

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Printed Name	Title
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The application must be signed by an individual authorized to legally bind the Applicant.

This Preliminary Proposal submission is **due by August 26 2024**  
All final project applications and required attachments must be submitted by September 23 2024

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

Project Title:

**Important:** *FTA funds require a large degree of dedication to detail and reporting, along with very specific requirements. Please review the documents associated with this call for projects to determine if your agency is able and willing to accept the terms and conditions provided.*

*Preliminary proposals are due by **5:00 p.m. on August 26, 2024.***

*Final project applications are due by **5:00 p.m. on September 23, 2024.***

*Late applications will not be accepted. Please send applications and copies of required documents to:*

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

*Or electronically to:  
[Section5310@spokanetransit.com](mailto:Section5310@spokanetransit.com)*

#### 2024 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. There is approximately \$673,340 in Section 5310 federal funds and STA local funds available for this call for projects (see table below for specific grant sources and amounts).

Projects that are 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 (<https://www.srtc.org/human-services-transportation-plan/>). See Attachment A for a complete list of eligible capital projects.

Of the total 2024 apportionment funds available under Section 5310, a minimum of 55% must be spent on “Traditional” capital projects and maximum of 45% of funds can be spent on “Other” operating projects. If there are no eligible applicants available to provide services, STA may certify this scenario to FTA. STA would then allocate available 5310 apportionments to fund complementary STA Paratransit capital projects.

2024 Call for Projects Funding Table

Funding Source	Amount Available
FY2024 Apportionment (Federal Match)	\$673,340
STA Local Match Contribution	\$236,000
<b>Total Funding Available</b>	<b>\$908,588</b>

Preliminary proposals are required and are generated for the purpose of gaining interest in the project with potential for being awarded Section 5310 funding and to determine initial project eligibility and perform an initial risk assessment. Preliminary proposals are due. STA will provide an **informational meeting August, 12 2024 via WebEx** to provide applicants the opportunity to ask questions about program and project eligibility requirements. STA will also provide **office hours every Wednesday beginning August, 14 2024 at 9:00-10:30 AM** until the application due date for interested applicants to ask questions or receive technical assistance. Applicants may also request a one-on-one meeting with STA to ask questions and receive technical assistance with application materials. Meeting information will be posted on the Spokane Transit Authority website at <https://www.spokanetransit.com/about-sta/section-5310-program>. If you need additional information about the WebEx informational meeting, please contact Emilio Bustos, Assistant Transit Planner at (509) 344-2609 or by email at [ebustos@spokanetransit.com](mailto:ebustos@spokanetransit.com). Individuals requesting accommodation are encouraged to contact Delana, Combs, Ombudsman at (509) 325-6094 at least 48 hours in advance of the meeting.

Final project applications are due by **9/23/2024 at 5:00 PM. Applications received after this date and time will not be considered. Incomplete project applications will also not be considered.** Applications may be sent via USPS, UPS, or FedEx to: Emilio Bustos, Spokane Transit, 701 W Riverside Ave, Spokane, WA 99201 or submitted electronically to [Section5310@spokanetransit.com](mailto:Section5310@spokanetransit.com). Mailed applications must be postmarked on or before 9/23/2024. Applications sent by fax will not be accepted; however, applications dropped off in person will be accepted.

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 final project evaluation committee, comprised of STA, WSDOT, and SRTC staff, will evaluate all eligible, and complete final project applications. The 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.

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

## Section I: Project Background

1. Please fill out the table to identify the project total project cost.

Funding Breakdown	
Federal Funding Request	\$
Applicant Agencies Local Match	\$
Total Project Cost	\$

- a. If revised from preliminary proposal, explain why:

2. If your agency intends on using an indirect cost rate, please indicate the type below:

- ☐ Federally approved indirect cost plan (approval from cognizant agency)  
☐ 10% de minimis rate (your agency does not have a federally approved rate)  
☐ No indirect costs will apply to this project

If your agency will use an indirect cost rate, please identify the rate and total expenditure in the budget narrative. *(Please note that STA will not accept indirect cost allocation plans that are not approved in writing by a federal agency).*

If revised from preliminary proposal, explain why:

3. What are this project's intended sources of local match? Use the table below to reflect all funding sources that will contribute to local match

Source of Funding	Amount	Secured Funds	Certify Non-Federal Source
Total Matched Funds:			

4. Applicants applying for ADA improvements must report what additions or changes will be made to the physical infrastructure (transportation facilities, sidewalks, etc.) as a result of this project. Different measures may be applied depending on the project. How does your agency plan to gather the federally required data listed below? Provide a description.

- a. Description of project related work
  - b. Geographic area served
  - c. Individuals served
  - d. Rides provided
  - e. Hours driven
  - f. Miles driven
  - g. Volunteer drivers utilized (if applicable)
  - h. Volunteer miles reimbursed (if applicable)
  - i. Seniors served
  - j. Individuals with disabilities served
5. New applicants who propose a new project or service 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 ask the applicant to submit one or more supplemental documents with the Final Project Application. If you are a new 5310 applicant, please email Emilio Bustos at ebustos@spokanetransit.com.

## Section II: Regional Transportation Needs

6. Referencing the Spokane County Coordinated Transit-Human Services Transportation Plan (HSTP) please check all the strategies your project would support.

	Strategies to Meet Regional Needs
<input type="checkbox"/>	Strategy 1: Maintain Existing Transportation Services
<input type="checkbox"/>	Strategy 2: Special Needs Transportation Investment
<input type="checkbox"/>	Strategy 3: Technology
<input type="checkbox"/>	Strategy 4: Capital Facilities and Vehicles
<input type="checkbox"/>	Strategy 5: Mobility Management

- a. Please provide a brief explanation of how your project would support each strategy and corresponding need selected.

## Section III: Proposed Service Improvements

7. What barriers will this project work to overcome in providing transportation options to seniors and/or individuals with disabilities?

#### Section IV: Project Performance Measures

8. Please provide a detailed description of how this project will reduce transportation gaps and enhance transportation service for seniors and individuals with disabilities. For example, do you provide a unique service or serve a population that is not currently served?

9. By the project's conclusion, how many unduplicated seniors and/or individuals with disabilities would be served because of this project? Describe the methodology used to track and calculate individuals served.

Total Served:

Methodology:

10. If applying for funds to continue a current 5310 project, please provide unduplicated numbers served in the last four quarters.

Quarter	Seniors and Individuals with Disabilities Served
1	
2	
3	
4	
Total Served	

#### Section V: Management

11. Are all positions in your requested project currently filled?

☐ Yes

☐ No

If yes, please describe the experience and qualifications of your project team.

Position	Experience and Qualification



12. Briefly describe your agency's experience with Federal funds and grant compliance.

13. What is your agency's plan to sustain this project after the Section 5310 funding expires?

#### Section VI: Financials

14. Is this project scalable?

- a. ☐ Yes
- b. ☐ No
- c. If yes, use the table below to reflect the extent of your project's scalability.

Due to the increasing number of qualified candidates applying for funds, all applicant projects may not be awarded full funding. In this scenario the applicant will be required to submit a new budget to reflect their adjusted award if their project is not fully funded. As an attachment to your final application please attach a copy of your total project budget. ***If the project is not an operating project, please consult with STA on how to document scalability.***

Scaled Budget	Scaled Term in Months	Unduplicated Served

#### Section VII: Notice of Changes

15. Please share any additional project details or changes that were not mentioned in the preliminary application.

## Section VIII: Finishing Up

Attachments Checklist: Please include the following items with your Final Project Application. (Applications received by the due date without required attachments will not be accepted)

- ☐ Complete Final Project Application
- ☐ Non-profit status documentation (IRS determination letter or articles of incorporation)
- ☐ Local match certification for the source of non-federal funds and amount of local share required
- ☐ Most recent financial audit report (for applicants with \$750k in federal grants)
- ☐ Signed certifications
- ☐ Current Title VI Plan or timeline to develop a Title VI Plan and Title VI certification
- ☐ Budget narrative worksheet *and* supporting documentation. For example, a budget spreadsheet, quote for a vehicle or other applicable documentation
- ☐ Current federally approved indirect cost rate, if applicable

## Application Authority

- ☐ I certify, to the best of my knowledge, that the information in this application is true and accurate and that this organization has the necessary fiscal, data collection, and managerial capability to implement and manage the projects associated with this application.
- ☐ My agency agrees to follow STA and federal procurement and grant management requirements of 49 USC 5310 and will submit my agency's procurement policy prior to purchasing any project equipment.
- ☐ I understand that a signed 5310 Subrecipient Agreement with STA will be required as a condition of receiving funds.
- ☐ My agency agrees to develop and submit a Title VI Plan that meets the general requirements as described in FTA Circular 47.021B. The Title VI Plan must be submitted to STA within 90 days of an executed agreement. Funds cannot be reimbursed until Title VI Plan is deemed in compliance.
- ☐ I certify that my agency will submit monthly, quarterly, and annual reports as required by the 5310 Subrecipient Agreement. The quarterly reports are due 20 days following the end of each quarter, as follows, Quarter 1 report is due January 20<sup>th</sup>, Quarter 2 is due April 20<sup>th</sup>, Quarter 3 is due July 20<sup>th</sup>, and Quarter 4 and the annual report are due on the second Friday of October.
- ☐ Your project will follow all applicable STA and federal procurement requirements; a copy of the requirements will be available at the informational meeting.

**All six boxes above must be checked, or your application may not be considered for funding.**

## Application Certification

The Applicant affirms the individual executing this 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.

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Authorized Signature	Date
----------------------	------

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Printed Name	Title
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The application must be signed by an individual authorized to legally bind the Applicant.



### Section 5310 Final Grant Application Scoring Criteria

Evaluator	Category	Points Possible	Points Awarded
STA	Risk Assessment	10	
STA	Applications Completeness	10	
STA	Regional Transportation Needs	10	
<b>Total</b>		<b>30</b>	

Evaluator	Category	Points Possible	Points Awarded
Committee	Proposed Service Improvements	10	
Committee	Performance Measures	20	
Committee	Management	10	
Committee	Financials	10	
<b>Total</b>		<b>50</b>	

Evaluator	Category	Points Possible	Points Awarded
STA & Committee	Final Application Packet	80	
<b>Total</b>			

**Project Title:**

**Applicant:**

**Name of Committee Scorer:**

**All Sections: Application Completeness (10 points)**

<b>Criteria</b>	<b>Unsatisfactory</b>	<b>Satisfactory</b>	<b>Excellent</b>	<b>Comments</b>	<b>Scores</b>
Are all questions answered and does the content of the answer provide sufficient background when applicable?	One or more questions were missed or incomplete.	All questions answered, content of answers provide satisfactory background when applicable.	All questions answered, contents of answers provide excellent background when applicable.		
	<b>0 Points</b>	<b>1-2 Points</b>	<b>3 Points</b>	<b>Score: (-/3)</b>	
Were all required attachments submitted in final application?	One or more items missing.	One or more items incomplete.	All attachments provided and complete.		
	<b>0 Points</b>	<b>1 Point</b>	<b>2 Points</b>	<b>Score: (-/2)</b>	
Is the local match for this project secured? (Question 3.)	The local match for this project is not secured.	The local match for this project is expected to be secured prior to the project start date.	The local match for this project is secured.		
	<b>0 Points</b>	<b>1 Points</b>	<b>2 Points</b>	<b>Score: (-/2)</b>	
Are line items in the budget table clearly described in the budget narrative, including the basis for each cost (cost estimates, quotes, actual data, etc.)?	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.		
	<b>0 Points</b>	<b>1-2 Point</b>	<b>3 Points</b>	<b>Score: (-/3)</b>	
				<b>Total Score: (-/10)</b>	
				<b>Total Score:</b>	

## Section II: Regional Transportation Needs (10 points)

Criteria	Unsatisfactory	Satisfactory	Excellent	Comments	Scores
What specific needs/ strategies from the <i>Spokane County Coordinated Public Transit-Human Services Transportation Plan (HSTP)</i> will this project meet? (Question 6.)	The project suggests no specific needs/strategies.	The project suggests 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.		
	<b>0 Points</b>	<b>1-6 Points</b>	<b>7-10 Points</b>	<b>Score: (-/10)</b>	
				<b>Total Score:</b>	

## Section III: Proposed Service Improvements (10 Points)

Criteria	Unsatisfactory	Satisfactory	Excellent	Comments	Scores
What barriers will this project work to overcome in providing transportation options to seniors and individuals with disabilities? (Question 7.)	Barriers are not identified.	The barriers are identified and how the barriers will be overcome by this project are addressed.	The project addresses unique or significant barriers by providing tailored and/or specialized transportation options for seniors and individuals with disabilities.		
	<b>0 Points</b>	<b>1-6 Points</b>	<b>7-10 Points</b>		
				<b>Total Score: (-/10)</b>	

## Section IV: Performance Measures (20 points)

Criteria	Unsatisfactory	Satisfactory	Excellent	Comments	Scores
Please provide a detailed description of how this project will reduce transportation gaps and enhance service for seniors and individuals with disabilities (Question 8.)	Project does not address a transportation need or gap.	Project addresses a transportation need or gap.	Project outlines a <i>unique</i> benefit to seniors and/or persons with disabilities and fills a transportation need or gap not currently provided in the community.		
	<b>0 Points</b>	<b>1-6 Points</b>	<b>7-10 Points</b>	<b>Score: (-/10)</b>	

Review the methodology for tracking and calculating individuals served (Question 9.)	The methodology is not provided or wholly inadequate.	The methodology proposed is relatively clear but is questionable in its reliability or the applicant's ability to gather the data.	The methodology proposed is clear, appears reliable and/or the applicant can gather the data.		
	<b>0 Points</b>	<b>1-6 Point</b>	<b>7-10 Points</b>	<b>Score: (-/10)</b>	
				<b>Total Score: (-/20)</b>	

**Section V: Management (10 points)**

<b>Criteria</b>	<b>Unsatisfactory</b>	<b>Satisfactory</b>	<b>Excellent</b>	<b>Comments</b>	<b>Scores</b>
Are all positions in your requested project currently filled? (Questions 11.)	No positions are filled.	Some positions are filled.	All positions are filled.		
	<b>0 Points</b>	<b>1-3 Points</b>	<b>4-5 Points</b>	<b>Score: (-/5)</b>	
Briefly describe your agency's experience with Federal funds and grant compliance (Question 12.)	No prior experience.	The management team has some experience /qualifications providing transportation services but not federal funds.	The management team has experience/qualifications providing transportation services using federal funding.		
	<b>0 Points</b>	<b>1-3 Points</b>	<b>4-5 Points</b>	<b>Score: (-/5)</b>	
				<b>Total Score: (-/10)</b>	



**Section VI: Financials (10 points)**

Criteria	Unsatisfactory	Satisfactory	Excellent	Comments	Scores
Is this project scalable? If so, does the applicant offer scope, and budget changes? (Question 14.)	The project is not scalable.	The project eliminates some items that are not needed to complete the scope of work.	The project eliminates all line items that are not needed to complete the scope of work.		
	<b>0 Points</b>	<b>1-3 Point</b>	<b>4-5 Points</b>	<b>Score: (-/5)</b>	
What is the agency's plan to sustain this project after the Section 5310 funding expires? (Question 13.)	The project will not continue.	The project will continue with 5310 funding.	The project will continue without 5310 funding.		
	<b>0 Points</b>	<b>1-3 Point</b>	<b>4-5 Points</b>	<b>Score: (-/5)</b>	
				<b>Total Score: (-/5)</b>	
				<b>Total Score: (-/10)</b>	
				<b>Total Project Score: (-/50)</b>	

Reviewer Signature:

\_\_\_\_\_  
Name Position Date

Spokane Transit Authority  
Section 5310 Subrecipient Invoice



Submitting Department:

Date:

Contact Person:

STA Agreement #:

Subrecipient Name:

CONTRACT INFORMATION	(To be completed with 1 <sup>st</sup> Disbursement)	
Project Name & Type:	Project Name	Project Type
Contract Term:		
FTA Award # (FAIN):		
Project String		
Federal Match %:		
Subrecipient Match %:		
Other Match %:		
Indirect Cost Rate (ICR) %:		
ICR Approval Date:		
Assistant Transit Planner Initials & Date		

INVOICE BACKGROUND	Yes	No	N/A
Allowable Costs			
Approved Line Items			
Monthly Beneficiary Data Report			
Budget Fluctuations			
Backup Documentation			
Project Billing Ledger			
Credits Included			
Assistant Transit Planner Initials & Date			

**SUMMARY:**

On Date 2024, STA and Agency Name entered into an agreement for 5310 federal funding. The agreement states that STA will provide grant oversight for Agency Name 5310 project. Agency Name project will provide transportation support for Beneficiary by providing Service within the Spokane PTBA.

Attached is the Agency Name reimbursement request for Date 2024 in the amount of \$. The invoice has been reviewed and is eligible for reimbursement.

Request Action: Reimburse Agency Name in the amount of \$ .

Review Signature:

Emilio Bustos, Assistant Transit Planner

Date

# Billing Ledger

FTA Award # (FAIN):				Total
Project String				
Federal Match %:				
Subrecipient Match %:				
Other Match %:				
Indirect Cost Rate %:				
Contract Total				

DBE Subcontract Name	Total Expenses
<b>Project Spending analysis</b>	
Monthly average	
Months left in Agreement	
Months Until Funds Spenddown	

Invoice #	Date Received	Federal Match	STA Local	SMS Local	Total Expenses	Month & Year	DBE Subcontract	Comments
			\$ -	\$ -				
			\$ -	\$ -				
			\$ -	\$ -				
			\$ -	\$ -				
<b>Total</b>		<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>			
<b>Remaining Match</b>		<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>			
<b>Remaining Grant Balance</b>		<b>\$ -</b>						
<b>Remaining DBE Balance</b>		<b>\$ -</b>						

Reconciled with Tyler Munis on \_\_\_\_\_

**Agency Name:** \_\_\_\_\_ **Project Name:** \_\_\_\_\_**Grant ID/FAIN #:** \_\_\_\_\_ **Agreement #:** \_\_\_\_\_**Month/Year of Report:** \_\_\_\_\_**1. Monthly Project Activity Narrative** (Please provide descriptions of project-related work during month.)

Listed below is your project's scope of work. Describe how this month's project activities meet the scope of work deliverables in your agreement.

## 2. Disadvantaged Business Enterprise Subcontracts

Does this project have any active DBE Subcontract(s)? ☐ Y ☐ N

If yes, please provide the Contract Term:

Use the table below to report the total amount paid to the subcontractor this quarter.

Contractor Name	Month	Total Contract Cost
Quarterly Spend Total		

## 3. Monthly Beneficiary Data

Include the total number served (unduplicated), total number of one-way rides provided, total number of Seniors served, and total number of Individuals with Disabilities served.

Total Number Served (unduplicated)	
Total number of one-way rides provided	
Total number of Seniors served	
Total number of Individuals with Disabilities served	

## 4. Project Manager Certification

*(Completion of this section certifies that the above information is true and accurate to the best of your knowledge.)*

<b>Project Manager:</b>	<b>Email:</b>
<b>Title:</b>	<b>Phone:</b>
<b>Signature of Authorized Person Completing Form:</b>	<b>Date:</b>

Please submit this monthly report to [Section5310@spokanetransit.com](mailto:Section5310@spokanetransit.com).

**Agency Name:** \_\_\_\_\_ **Project Name:** \_\_\_\_\_

**Grant ID/FAIN #:** \_\_\_\_\_ **Agreement #:** \_\_\_\_\_

**Report for quarter ending:**      ☐ **March**      ☐ **June**      ☐ **September**      ☐ **December**  
**Year:**      ☐ **2024**      ☐ **2025**      ☐ **2026**

**1. Progress Narrative** (Please provide descriptions of project-related work during the quarter.)

A. Describe how this quarter's project activities meet the scope of work deliverables in your agreement.

B. Does this project have any active DBE Subcontract(s)? ☐ Y ☐ N

If yes, please provide the Contract Term:

Use the table below to report the total amount paid to the subcontractor this quarter.

Contractor Name	Month 1	Month 2	Month 3	Total Contract Cost
Quarterly Spend Total				

C. Include the geographic area served, total number served (unduplicated), total number of rides provided, total number of hours driven, total number of miles, total number of volunteer drivers utilized, total number of volunteer mileage reimbursed in the quarter (as applicable), total number of Seniors served, and total number of Individuals with Disabilities served.

Geographic Area Served	
Total Number Served (Unduplicated)	
Total Number of Rides Provided	
Total Number of Hours	
Total Number of Miles	
Total Number of Volunteer Drivers Utilized	
Total Number of Volunteer Miles Reimbursed	
Total Number of Seniors Served	
Total Number of Individuals with Disabilities Served	



D. Describe project efforts to address unmet transportation needs.

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

F. Describe service improvements and their impacts to the community, seniors and/or citizens with disabilities.  
*Examples could include 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.*

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

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

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

## 2. Complaints & Lobbying

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

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

Any lobbying activities this quarter? ☐ Y ☐ N

SF-LLL form submitted? ☐ Y ☐ N

## 3. Vehicle Records

A. Attach records for each vehicle (if applicable) including regularly scheduled oil changes, tires, lift/ramp maintenance, accessibility features maintenance, damages, and warranty claims.

Vehicle maintenance records ☐ Y ☐ N

Warranty claims ☐ Y ☐ N

Applicable? ☐ Y ☐ N

ADA accessibility operational ☐ Y ☐ N

In service for entire quarter ☐ Y ☐ N

## 4. Project Manager Certification

*(Completion of this section certifies that the above information is true and accurate to the best of your knowledge.)*

**Project  
Manager:**

**Email:**

**Title:**

**Phone:**

**Signature of Authorized  
Person Completing  
Form:**

**Date:**

Please submit this quarterly report to [Section5310@spokanetransit.com](mailto:Section5310@spokanetransit.com).

To:

From:

Date:

Subject:

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Spokane Transit is responsible for coordinating **non-Federal** funds used to meet local match requirements for Section 5310 Projects. You must certify the non-federally funded subrecipient local match required by your agency for this project.

Please identify the source of your funds as well as the amount and certify they are non-federal funds and are secured.

Source of Funding	Amount	Secured Funds	Certify Non-Federal Source
Total Matched Funds:			

Name of Organization:

Name of Authorized Agent:

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Signature

Date

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Title or Position

**Spokane Transit Authority  
Section 5310 Program Management Plan  
Public Notice**

Notice is hereby given that from July 3, 2024, until August 2, 2024, Spokane Transit Authority will hold a public comment period to receive feedback on the Section 5310 Program Management Plan update. This draft document and information to submit a comment will be posted on STA's [Public Notices](#) webpage.

The 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). The PMP is developed in accordance with FTA Circular C 9070.1G (July 7, 2014), 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. As an agency that receives federal financial assistance, Spokane Transit is required to adopt a PMP for Section 5310 funds and review on an annual basis. Substantial updates to this document require a 30-day public comment period. The PMP must include a recipient's program objectives, policies, procedures, and administrative requirements.

This document will be available for review and comment at:

<https://www.spokanetransit.com/about-sta/public-notices>. Written comments may be sent to: Attn: Emilio Bustos, Assistant Transit Planner, Spokane Transit Authority, 701 W Riverside Ave, Spokane, WA 99201 or by email to [ebustos@spokanetransit.com](mailto:ebustos@spokanetransit.com). The **Section 5310 Program Management Plan** is in draft form and will continue to be revised until approved by FTA.

Spokane Transit assures nondiscrimination in accordance with Title VI of the Civil Rights Act of 1964. For more information, visit [www.spokanetransit.com](http://www.spokanetransit.com). Upon request, alternative formats of this information will be produced for individuals who are disabled.

**Non-Discrimination Notice**

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.