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| Revision #:          | 2         |
| Implementation Date: | 2/22/2024 |
| Last Revision Date:  | 7/3/2024  |

## 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 Principle 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 fourteen calendar days to address the findings. Once the subrecipient has addressed all findings, a monitoring review completion letter will be sent. These letters will include the date of the review, confirmation that all findings were addressed or not present, and the closure of the monitoring review. These letters shall be signed by the Assistant Transit Planner and the Principal Transit Planner.

### 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.