FTA 5310: Specialized Transportation



UTA's Section 5310 Post-Award Management Guide

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1. Post Award Training

1.1. Purpose of This Guide

This guide explains the primary requirements for managing a Federal Transit Administration (FTA) Section 5310 award after it has been awarded. It is intended for agency staff responsible for grant administration, financial reporting, reimbursement requests, project oversight, vehicle management, or regulatory compliance.

The guide supplements UTA's post-award training and provides practical instructions for meeting grant requirements throughout the life of the award. It includes information about reporting, invoicing, record retention, vehicle management, civil rights requirements, monitoring, risk assessments, and grant closeout.

As the direct recipient and pass-through entity for these funds, UTA is responsible for monitoring each subrecipient and ensuring that Section 5310 funds are managed in accordance with federal requirements. Your agency's compliance directly affects UTA's compliance with FTA requirements. UTA's Coordinated Mobility team is available to provide technical assistance, answer questions, and help your agency understand its responsibilities.

Additional program policies and procedures are available in UTA's FTA-approved Section 5310 Program Management Plan, which is available at rideuta.com/5310grants

How to use this guide: We recommend you read the entire guide front to back when you first start managing this grant and keep a copy for reference. This guide may be updated every grant cycle, and will be available for download on rideuta.com/cmm

Acronyms used in this book:

FTA= Federal Transit Administration
FFY= Federal Fiscal Year
UTA= Utah Transit Authority
PTE= Pass Through Entity that receives funds from FTA and distributes it to subrecipients
CM = Coordinated Mobility Department within UTA that oversees the FTA 5310 awards
CMGA= Coordinated Mobility Grant Administrator
GCO = Grant Compliance Officer
ZG= Grant Management Portal ZoomGrants
UZA= Large Urbanized Areas of Utah
CAFR = Comprehensive Annual Financial Report
ACFR = Annual Comprehensive Financial Report
LCC = Local Coordinating Council
DMV= Department of Motor Vehicles
UDOT = Utah Department of Transportation
ADA= Americans with Disabilities Act
LAP= Language Access Plan
LEP= Limited English Proficient persons
DBE = Disadvantaged Business Enterprise

EEO= Equal Employment Opportunity
CAP= Corrective Action Plan
GAO= U.S. Government Accountability Office
GAGAS= Generally Accepted Government Auditing Standards (Yellow Book)

1.2. Post Award Training Workshop

Once your agency has received their award letter, and Notice of Funding from ZoomGrants, there will be a mandatory Post Award Training Workshop (typically held in the fall). Attendance is required by all agencies receiving an award, whether it is technology, operations, vehicle, or any other project type. This training workshop will review what is expected of you as an FTA 5310 funds recipient. Operations requirements and specific requirements for vehicle awards are covered. New subrecipients must also schedule a one-on-one or group training with our RidePilot specialist before receiving a vehicle, as vehicles require more management and documentation retention than operating assistance projects do. Dates and Times of the workshop will be sent out by email, through ZoomGrants, and posted on our website: Rideuta.com/cmm

NOTE: If you have new employees or need a refresher, these trainings are open to any and all awardees. Further instructional videos and recorded trainings can be found on the 'Utah UZA's FTA 5310' YouTube page:
www.youtube.com/@UTAHUZAsFTAGrantManagement

1.3. RidePilot Training

For agencies receiving vehicles, you will need to schedule a RidePilot Training and set up with Clint Wilkinson. If you are just looking for a refresher or have questions regarding RidePilot you can also reach out to him.
Vehicles will be inspected inside and out by UTA every 2 years. UTA also does a separate Asset Inventory check every 2 years for asset verification, where someone will come take a photo of the vehicle and use GPS to mark its location. No inspection inside the vehicle is needed for the asset inventory. After a vehicle meets minimum useful life, subrecipients must continue to follow UTA instructions regarding asset tracking, reporting, storage, insurance, and disposition until UTA approves disposition and releases the federal interest.

Pre/Post trip inspections are required daily and must be kept for 3 years. RidePilot must be updated daily or weekly, but no less than weekly.

For more on vehicle management, see chapter 4 of this guide.



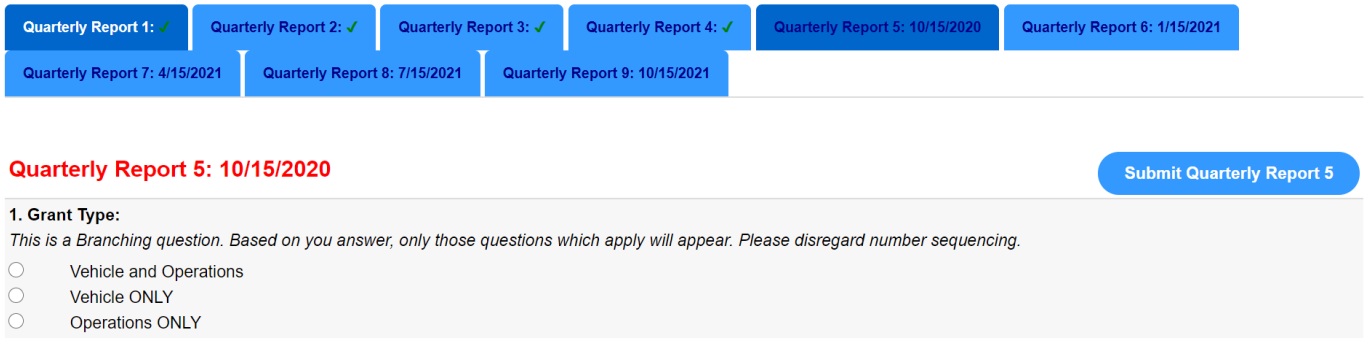
2. Reporting Requirements

2.1 Daily/Weekly Reports

If you are running vehicles, you must complete your trips in RidePilot daily, or no less than once a week. Pre/post trip inspection forms must be completed daily and kept where a reviewer or auditor can check them, whether in a folder or on a google drive.

2.2 Quarterly Reports

The FTA 5310 program requires quarterly reports beginning the day the contract is executed to the date the project is completed. These reports will be submitted and recorded in our grant management software ZoomGrants. In ZoomGrants, use the tab labeled Quarterly Report and the date associated with the report due.



Quarterly reports are required for the active project period and until UTA approves project closeout. Vehicle, trip, maintenance, and asset reporting may continue beyond financial closeout as required by UTA.

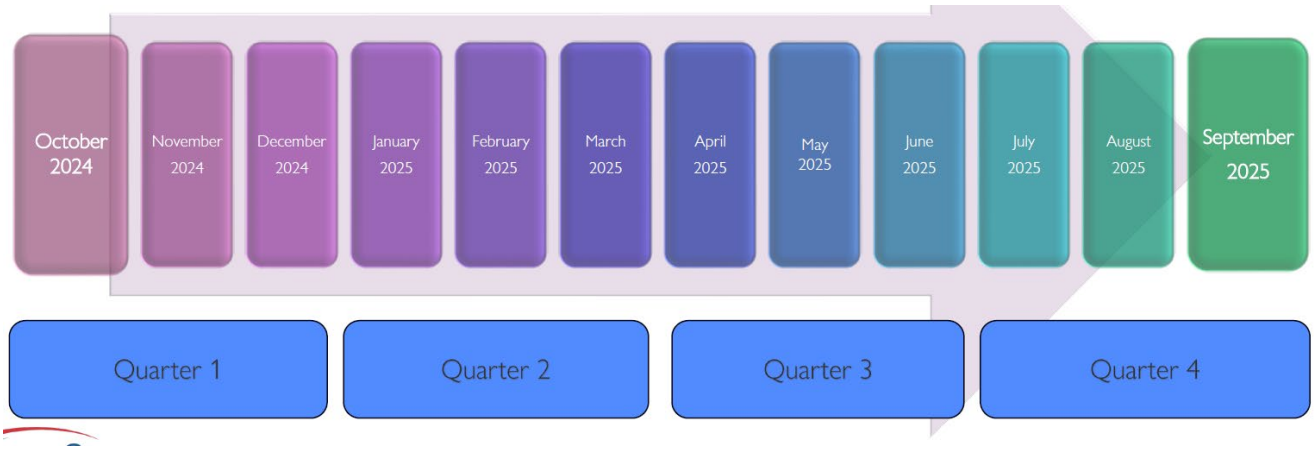
Quarterly Reports are due by the 10th of the month following the end of the quarter. (E.g. Jan-March report will be due by April 10th)

The 5310 Grant Compliance Officer will run a report on the 15th day after each quarter, to check for subrecipient compliance. If your quarterly report is late or missing, it will be recorded and may affect your level of risk and future applications. (This will be explained further in chapter 5.2 Risk Assessment)

Federal Fiscal Year Quarters:

1) October – December (report due January 10th)
2) January – March (report due April 10th)
3) April – June (report due July 10th)
4) July – September (report due Oct 10th)

Federal Fiscal Quarters, example is using FFY2025:

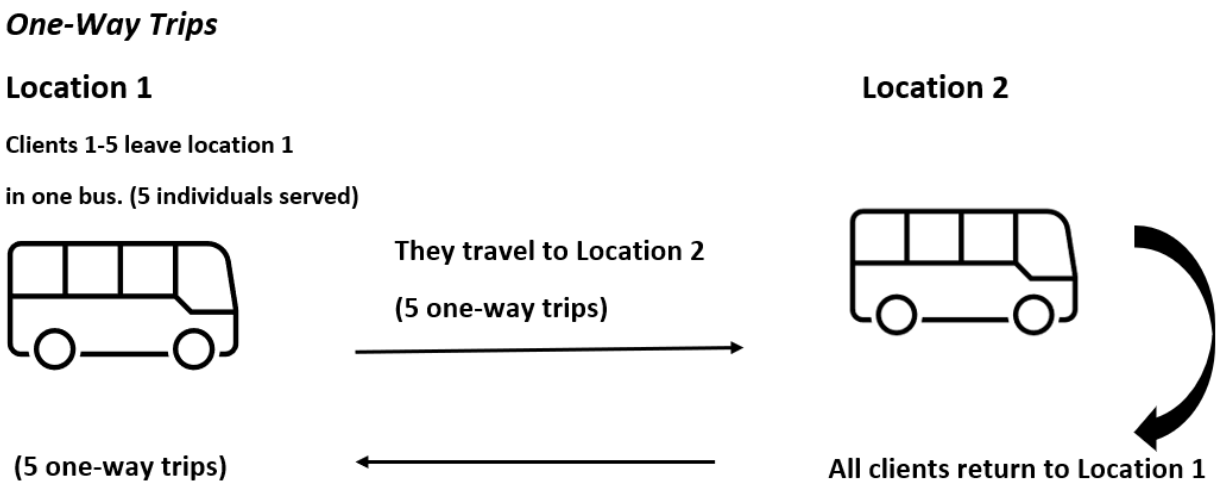


Filling out your report

Quarterly reports should include project type, total number of people served, trip purposes, one-way trips, and a narrative. Quarterly narratives should include progress made on your project, goals being met, setbacks, vehicle delivery dates, vehicle placed in service dates, any civil rights complaints or litigations, any resolutions, any updates on internal audits, any policy changes, any new employees hired, etc. Please be as descriptive and inclusive as possible in your quarterly narrative.

Total number served is based on the Federal fiscal year, so from October to the end of September. This means you would only count the number of people your project served for the year in those dates. For example, if my agency has 10 clients we typically serve, in my Oct-Dec quarterly report (due January 10th) I would say that my project served 10 people. Then the next quarter, Jan – March (due April 10th) I added no new clients so my quarterly report would say I served 0 people. Then, let's pretend in June we added 5 new clients. Then in my next quarterly report, I would report 5 people served. When the Federal fiscal year ended in October, after I submitted my July-September report, I would start over. So my Oct – Dec quarterly report would be 15 people served, because I have 15 clients and am starting a new year.

For one-way trips, you will report the number of trips you took from point A to point B.
If five eligible passengers travel from Location A to Location B, that is five one-way passenger trips. If those same five passengers return, that is another five one-way passenger trips, for a total of ten one-way passenger trips.



Incidental trips are any trip taken where a client was not involved. These can be taking a car for maintenance, going to the gas station, running an errand, etc. If you report incidental trips you MUST include in your quarterly narrative what those trips were for.

TIP: Click the Refresh Page button (in blue at the top of the ZoomGrants screen) after submitting your report and make sure it shows it was submitted. You may have to click submit again and refresh a second time before it shows as submitted.

2.3 Annual Reports and Forms

An annual report of your award project progress will be created by the UTA Grant Manager based on your quarterly reports and sent to the FTA. If UTA has further questions about your project for this Federal annual report, we will contact you and expect you to reply in a timely manner.

There are also documents that must be provided annually.

These include:

1) Financial Report/ Internal Audit Report
2) Certificates and Assurances (signed)
3) Vehicle Insurance if coverage changed
4) Title VI update (every 3 years)

Federal Certifications and Assurances

FTA is authorized to consolidate any certification or assurance required by law or regulation for its programs into a single document a grant applicant may submit annually and must publish a list of all such certifications annually (49 U.S.C. 5323(n).)

FTA Certifications and Assurances are issued annually. UTA will send the current version to active subrecipients for signature, and subrecipients must return the signed document by the deadline provided by UTA. **If your agency already has a signed copy for other Federal awards, please send us a copy.**

Federal Master Agreement

Along with the Certs and Assurances we will also include the yearly Master Agreement. The Master Agreement is a form the FTA releases yearly that applies to each Underlying Agreement (Grant Agreement, Cooperative Agreement, Loan Agreement etc.) for a specific award. This agreement outlines compliance and responsibilities of both parties, UTA and the subrecipient. **This does not need to be signed** and returned, but it would be wise to review it yearly and save a copy for reference.

Financial Report/Internal Audit

Every year each subrecipient must turn over a full financial report and/or any internal audit and results. Agencies over the Single Audit threshold are required to send UTA a copy of their Single Audit annually.

A typical financial report will include current assets, net capital assets, liabilities (such as debt), revenue, grants, donations, interest, expenses (by category), investing activities, change in net assets, net assets at the beginning of the year, and net assets at the end of the year.

If your agency does not currently participate in internal audits, we highly suggest looking into it. Internal audits are good for detecting issues early, avoiding fraud waste and abuse, and to help you understand how your agency is doing and if you can handle new funding. An internal audit functions as an internal control and helps you prepare for external audits. If you can, self-identify the key issues in your agency and communicate with your internal auditors. Ask them if you are complying and if they can help you identify risk areas. You can then create a Corrective Action Plan (CAP) to show you are aware of compliance issues and what steps you will take to correct them. Completing a Corrective Action Plan will help with lowering your risk.

In accordance with 2 CFR § 200.415, all financial reports and reimbursement requests submitted by subrecipients to UTA must include the following certification statement:

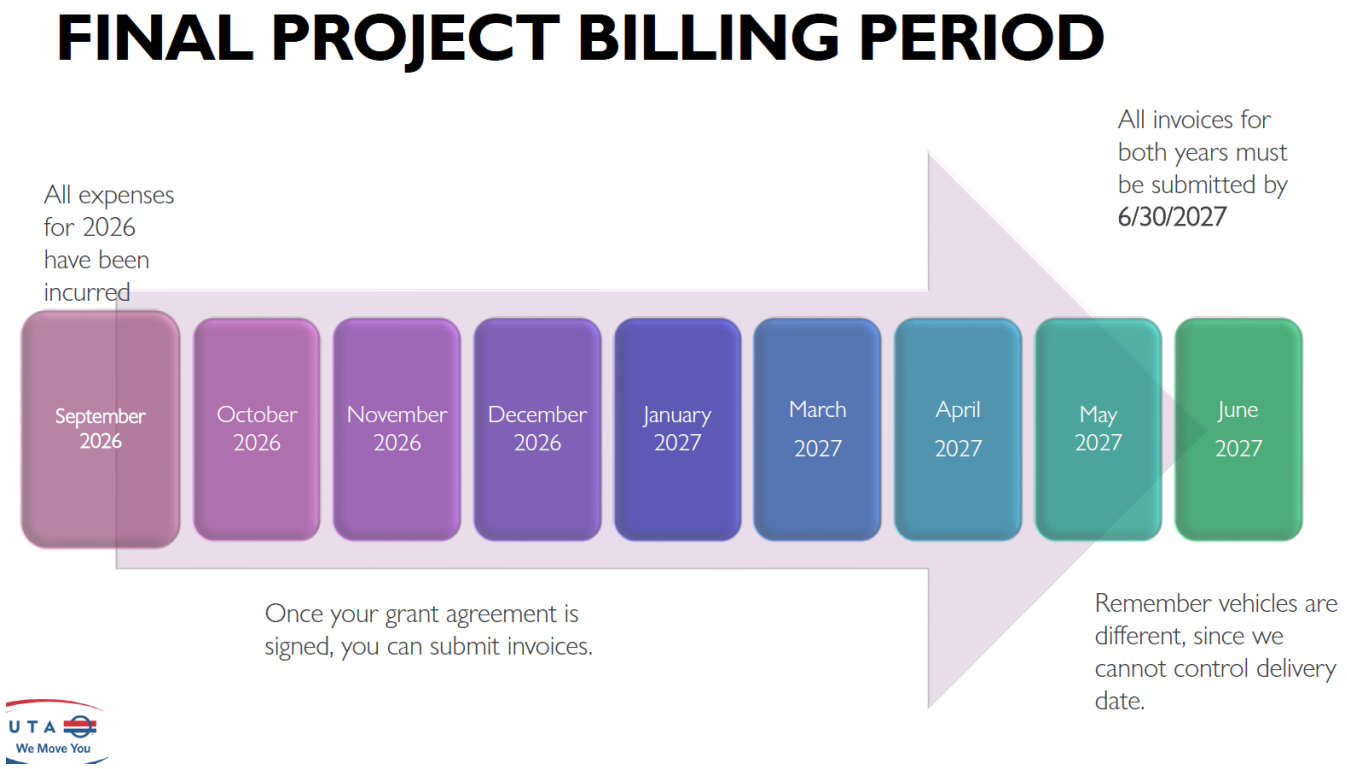
"By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the Federal award."

2.4 Grant Close Out Report

When projects are complete we will send a Close Out Form for final questions.

In ZoomGrants your quarterly reports can be turned off by the Admin. If closing operations, you will need to check "this is my last invoice" on the last request for the remaining balance. On your last quarterly report, select "project complete". Asset, record retention, audit access, and disposition duties continue after financial closeout.

2.5 Grant Timeline



3. Operations Invoicing

3.1 Allowable Expenses

If your FTA 5310 award includes operations, this is paid to you as a reimbursement at 50% of the total expense. FTA instructions (C 9070.1H) state that volunteer driver programs are eligible and include support for costs associated with the administration, management of driver recruitment, safety, background checks, scheduling, coordination with passengers, other related support functions, mileage reimbursement, and insurance associated with volunteer driver programs. The costs of enhancements to increase capacity of volunteer driver programs are also eligible. FTA encourages communities to offer consideration for utilizing all available funding resources as an integrated part of the design and delivery of any volunteer driver/aide program. If you are unsure whether an expense is eligible for reimbursement, **please ask before** submitting a reimbursement request.

Each reimbursement request must clearly identify the approved project activity, reporting period, cost category, and documentation supporting the cost.

Any expense must be directly related to the program or project to qualify as an allowable expense. Data plans for mobile devices to allow RidePilot AVL, or cell phones to allow operators to contact dispatch are allowable if required to run 5310 vehicles.

If you are billing for reimbursement on trips from outside transportation agencies, such as Uber or Lyft, Evoucher trips, 3rd party transportation provider, taxi shared ride, you MUST include: 1) starting and ending location 2) trip type or purpose 3) receipt showing cost, miles traveled 4) if including a tip in the expense amount it must "reasonable" for your area, typically under 18%.

Operating assistance allowable (reimbursed at 50%)

Any activities that directly support the operation of your program, including

- Driver salary
- Outreach for volunteer driver programs
- Fuel expenses
- Vehicle insurance
- Anything allowable under preventive maintenance

Preventive Maintenance allowable (reimbursed at 80%)

activities, supplies, materials, labor, services, and associated costs required to preserve or extend the functionality and serviceability of the asset in a cost-effective manner

- Routine scheduled maintenance
- Tires
- Windshield
- Car wash

Activities NOT ALLOWED

- Depreciation
- Taxes for which the organization is legally exempt, federal income taxes, and other taxes identified as unallowable under 2 CFR Part 200 or the award terms
- Lawyer fees
- Any goods or services for personal use
- Indirect costs

After reviewing the above list, if you are still unsure a charge is allowable please check the Federal Circular, 2 **CFR 200 Subpart E – Cost Principles.**

3.2 Preparing backup documentation

Backup documentation must be included with any Operations Reimbursement Invoice. Documents must be uploaded as a single PDF file. This guide will show you how that file needs to be organized, what information it should include, and show some examples.

The first page of your backup document should include a summary of all expenses for the quarter. Expenses should be separated by category (i.e. Driver Wages, Fringe Benefits, Fuel, Vehicle, Maintenance, Telecommunication etc.) It should also show a clear Total Balance, and Amount Requesting (the amount you are requesting will be 50% of the total balance).

Example Cover Page:

Financial Billing Summary Oct-Dec 2024

Made via FastBooks Accounting Software for Happy Transportation Agency

Expense Type	Description	Total Amount
Wages and fringe	payroll for drivers	$ 80,000.00
Fuel		$ 6,000.00
Telecommunications	T Mobile	$ 600.00
Preventative maintenance		$ 2,000.00
Repairs		$ 100.00
Vehicle Insurance		$ 800.00
Transportation	Uber Ride	$ 40.00
	Total Expenses:	$ 89,540.00
	Local Match:	$ 44,770.00
	5310 Reimbursement Request:	$ 44,770.00

5310 Grant Funds Awarded:	$	100,000.00	Remaining:	$ 55,230.00

System: [redacted] 4:23:38 PM [redacted] Page: 1
User Date: [redacted] User ID: sa

U.S. Payroll

Ranges:

Employee ID	First - Last
Department	First - Last
Check Number	First - Last
Audit Trail Code	First - Last
Date	4/1/2017 - 4/30/2017

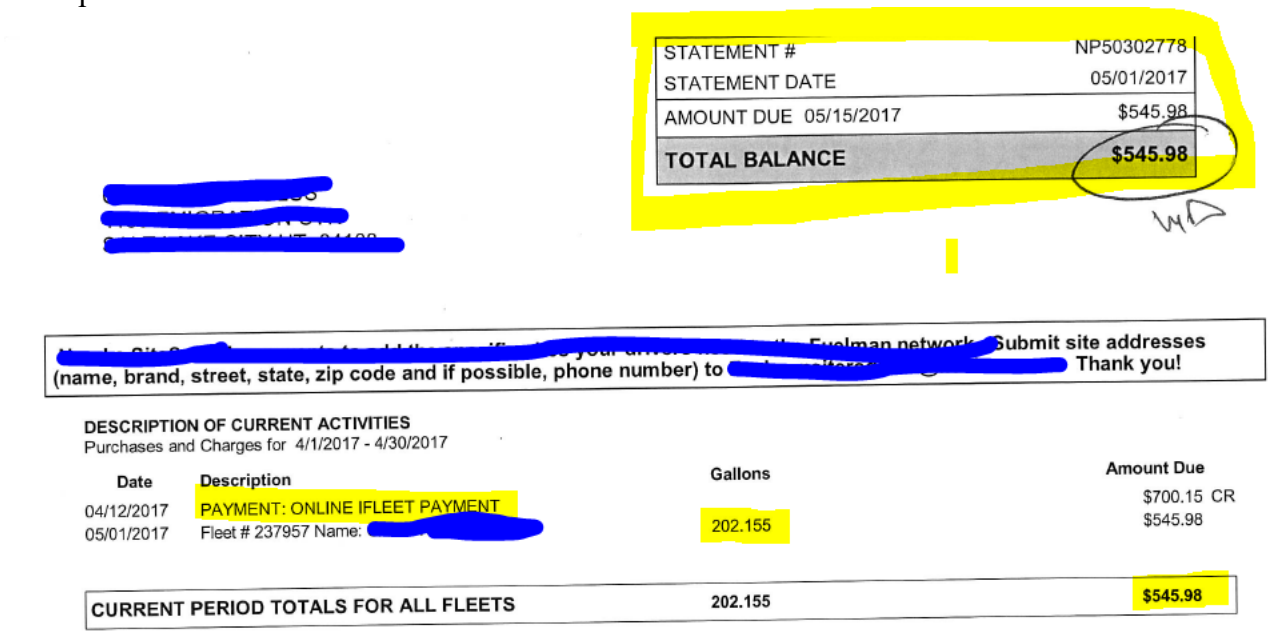
Sort By: Employee ID

Employee ID	Check Number	Dept	Audit Trail	Beg Date	End Date	Code	Shift	Hours/Units	Total Rate	Amount
BLAIJ01	22458	001	UPRCC00000420	4/1/2017	4/15/2017	PEN		1.00	$44.63	$44.63
BLAIJ01	22458	001	UPRCC00000420	4/1/2017	4/15/2017	SALARY		86.67	$1,487.50	$1,487.50
BLAIJ01	22458		UPRCC00000420	4/1/2017	4/15/2017	UT		0.00	$0.00	$60.73
BLAIJ01	22477	001	UPRCC00000421	4/16/2017	4/30/2017	PEN		1.00	$44.63	$44.63
BLAIJ01	22477	001	UPRCC00000421	4/16/2017	4/30/2017	SALARY		86.67	$1,487.50	$1,487.50
BLAIJ01	22477		UPRCC00000421	4/16/2017	4/30/2017	INSUR		0.00	$0.00	$397.18
BLAIJ01	22477		UPRCC00000421	4/16/2017	4/30/2017	UT		0.00	$0.00	$60.73
BROWR01	22459	001	UPRCC00000420	4/1/2017	4/15/2017	HOUR		18.75	$10.00	$187.50
BROWR01	22478	001	UPRCC00000421	4/16/2017	4/30/2017	HOUR		29.50	$10.00	$295.00
CABAH01	22460	001	UPRCC00000420	4/1/2017	4/15/2017	HOUR		80.75	$15.00	$1,211.25
CABAH01	22460		UPRCC00000420	4/1/2017	4/15/2017	UT		0.00	$0.00	$59.39

If you keep your payroll in an Excel spreadsheet, that is fine if you include a unique employee identifier, check number, time, and amount. If we are unable to identify the drivers, and the amounts being requested your request will be denied.

For all other reimbursable items, you must submit proof of payment. This can be in the form of scanned receipts, or an invoice accompanied by a bank statement showing the invoice was paid.

Example of invoice and bank statement:



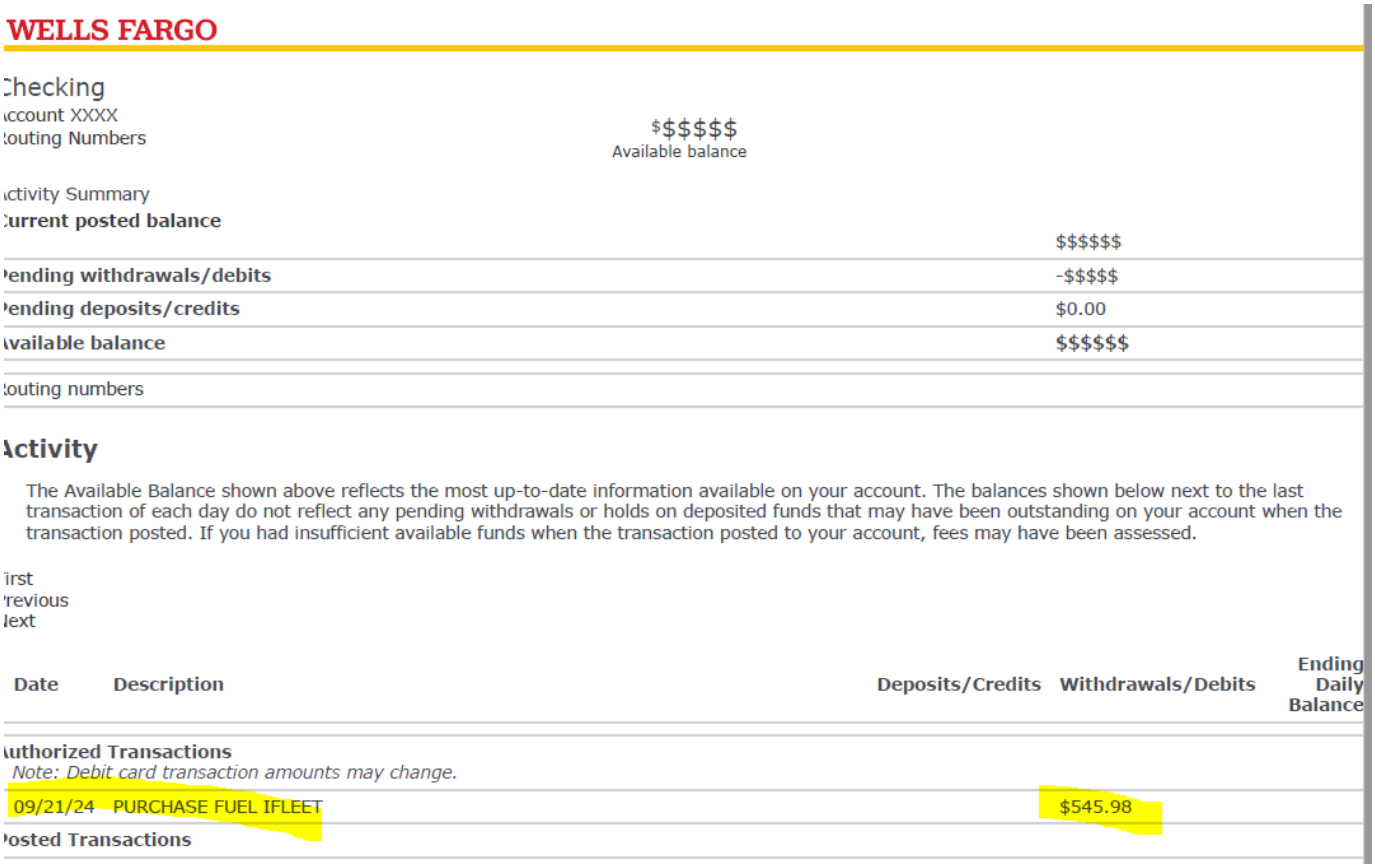
STATEMENT #	NP50302778
STATEMENT DATE	05/01/2017
AMOUNT DUE 05/15/2017	$545.98
TOTAL BALANCE	**$545.98**

[redacted]

[redacted] Fuelman network. Submit site addresses (name, brand, street, state, zip code and if possible, phone number) to [redacted] Thank you!

DESCRIPTION OF CURRENT ACTIVITIES
Purchases and Charges for 4/1/2017 - 4/30/2017

Date	Description	Gallons	Amount Due
04/12/2017	PAYMENT: ONLINE IFLEET PAYMENT		$700.15 CR
05/01/2017	Fleet # 237957 Name: [redacted]	202.155	$545.98
CURRENT PERIOD TOTALS FOR ALL FLEETS		**202.155**	**$545.98**



WELLS FARGO

Checking
ccount XXXX
outing Numbers

$$$$$$
Available balance

ctivity Summary
urrent posted balance $$$$$$
ending withdrawals/debits -$$$$$
ending deposits/credits $0.00
vailable balance $$$$$$

outing numbers

Activity

The Available Balance shown above reflects the most up-to-date information available on your account. The balances shown below next to the last transaction of each day do not reflect any pending withdrawals or holds on deposited funds that may have been outstanding on your account when the transaction posted. If you had insufficient available funds when the transaction posted to your account, fees may have been assessed.

irst
revious
lext

Date	Description	Deposits/Credits	Withdrawals/Debits	Ending Daily Balance
uthorized Transactions				
	Note: Debit card transaction amounts may change.			
09/21/24	PURCHASE FUEL IFLEET		$545.98	
osted Transactions				

Please highlight the expense or blur out the other expenses to make it clear which payment correlates with this specific invoice. If your invoices are not backed by receipts or bank statements your payment request will be denied.

The more organized and clearer your backup documentation is, the faster we will be able to approve your payment request. If you have a payment request that shows approved, but it has been more than 30 days, and you have not received payment please notify the GCO.

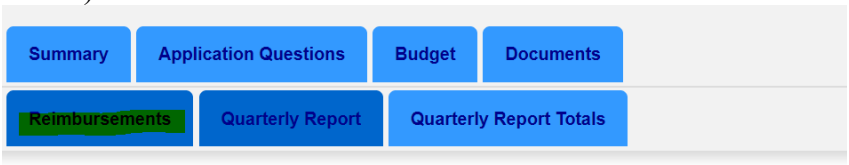
3.3 Submitting a payment request

It is very important that UTA shows regular and timely use of grant funds as your projects progress. **Do not wait until the end of the grant to draw down funds.**

Please assign an employee to this task. Subrecipients must submit invoices on a quarterly basis (monthly with UTA permission) with proper back-up documentation attached to the invoice. (see 3.2 Backup Documentation for instructions). If you are submitting quarterly, by the end of your grant you should have 8 total invoices submitted for operating assistance. Please see the timelines discussed in the previous chapter to ensure you meet the dates on time.
UTA can send payments by check or direct deposit. If you would like to set up direct deposit, please let us

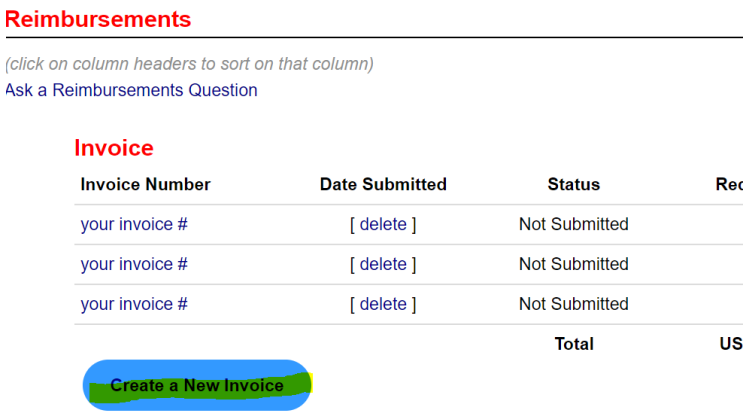
know. You will be required to fill out an ACH form and submit it to the UTA Accounts Payable (AP) department. The form is available on the UTA website and within the ZoomGrants Application in the documents section.
Each reimbursement request must clearly identify the approved project activity, reporting period, cost category, and documentation supporting the cost.

To begin an electronic invoice for a reimbursement payment request, go to your ZoomGrants account and make sure you are in the correct year (your application admin must give you invoice permissions to access) and click the 'Reimbursements" tab.

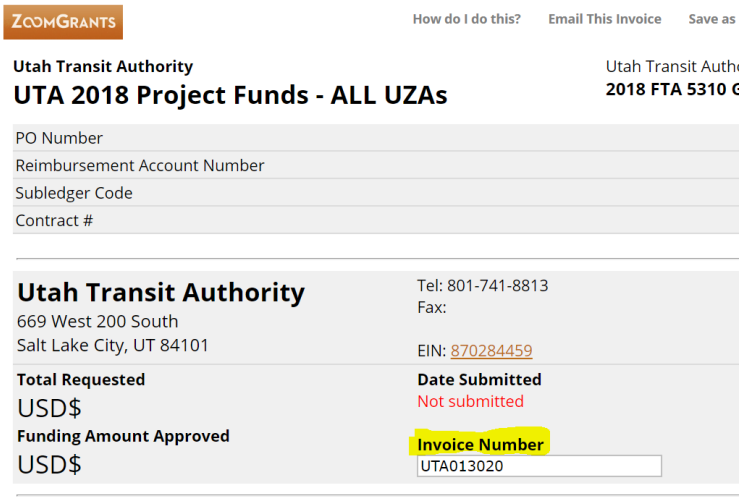


Reimbursements

Next, assuming you have invoicing permissions, you click the 'Create a new invoice" in blue.

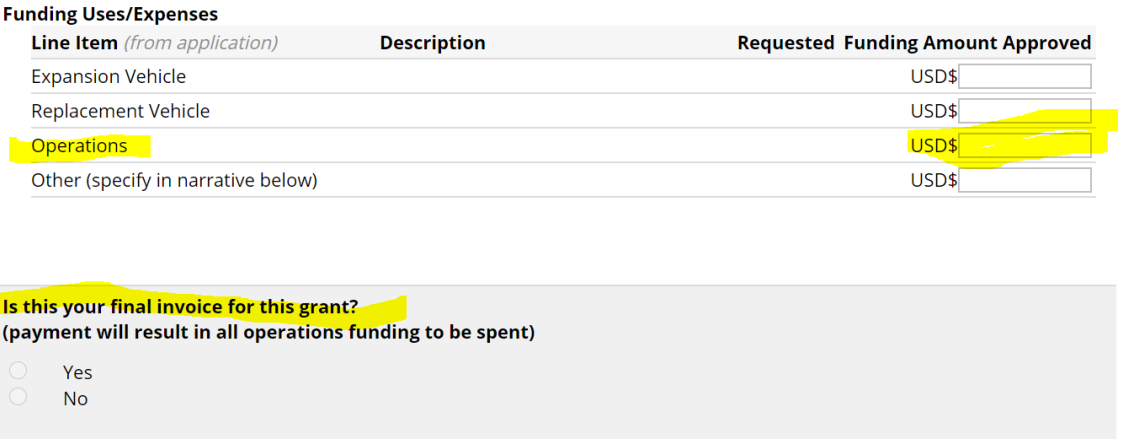


Next, a pop-up box will open for you to fill out. For the invoice number, you will use your agency abbreviation and the last date of the quarter you are billing for. (E.g. UTA013020)

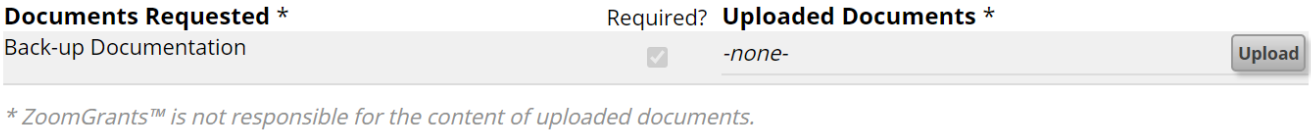


Then, you will enter the 'Total Requested'. This is the Federal Amount you are requesting for reimbursement, not the total amount for the quarter. The total amount for the quarter should be your local match added to the total requested.

For Operations: Local Match 50% + Federal Amount (Total Requested) 50% = Total Amount for Quarter



Put the federal amount you are requesting in the correct line-item box. Be sure to answer the question if this is your final invoice. Final invoice means you will have used all operation money awarded after this last invoice is paid.



Last, you will need to upload your backup documentation to this invoice before submitting it. Please read 3.2 Backup Documentation Guide for instructions on how to prepare those documents.

Once your invoice is submitted, UTA will send you payment within 30 days by check or direct deposit if requested. You can check your remaining balance from the reimbursement tab in your ZoomGrants account.

Funding Uses/Expenses

	Contracted Budgets	Invoice			
Line Item *(from application)*	**Contracted Budgets**	**Invoice Approved**	**Invoice Paid**	**Remaining Balance**	**Invoice Requested**
Expansion Vehicle	USD$ 0.00			USD$ 0.00	
Replacement Vehicle	USD$ 0.00			USD$ 0.00	
Operations	USD$ 0.00			USD$ 0.00	
Other (specify in narrative below)	USD$ 0.00			USD$ 0.00	
	USD$ 0.00			**USD$ 0.00**	

4. Vehicle Management

4.1 Vehicle Pick up, Invoicing, and Insurance

To ensure Federal procurement regulations are followed, UTA procures vehicles for the FTA 5310 grant subrecipients. Subrecipients may not procure federally funded vehicles, equipment, or services independently unless UTA provides prior written approval and review of your procurement policies.

After the FTA has approved all awards, and your agency has signed your grant agreement, UTA will begin the vehicle ordering process on your behalf.

Vehicle Ordering

The CM Manager, Procurement and vehicle vendor work together to order vehicles once Grant Agreements are finalized. Depending on the vehicle, wait times for delivery can vary. Some vehicles have to be built/produced where others can be purchased from a state vendor.

Typically awarded vehicles:

- Cutaway/Paratransit style bus
- ADA Ford Transit (large van)
- Large passenger van
- ADA minivan
- Minivan
- Sedan

Vehicles can be gas powered, hybrids or electric (EV) as requested in your application.

When an order has been placed for a vehicle award, the subrecipient will receive a notification email of the order from the GCO. Any order status updates will also be emailed to the subrecipient.

Training

Subrecipient will be trained as to how to manage their vehicle award at the post-award training (see 1.2)

Delivery Notification Email

Once the awarded vehicle arrives at UTA, the subrecipient will be emailed a notification as well as instructions as to what steps to take to receive their vehicle and/or register the vehicle at DMV if needed. A separate email will be sent from the UTA Accounting department with the vehicle vendor invoice, and the invoice for the local match. Both invoices should be uploaded into ZoomGrants after receipt of the vehicle.

Please DO NOT mail checks to UTA but bring them to pick up your vehicle. If your agency requires checks to be mailed, please include the match invoice with the check.

DMV

The subrecipient will need to have someone with spending authority to meet with the GCO at the DMV if the vehicle is not pre-registered by the vendor. UTA will have the title work ready and will make the

appointment for the DMV. The subrecipient will meet with the GCO at the DMV at the agreed upon appointment time. Both parties will work with the DMV to get the vehicle registered. UTA will be the lien holder on the vehicle. The subrecipient will have to pay any registration fees as well as taxes if not a non-profit/government agency (please bring any necessary paperwork to prove non-profit status). Once registered and license plates received, the subrecipient can proceed to vehicle delivery.

Vehicle Delivery/Riverside Pick-up

Vendor Delivery and UTA Acceptance
Once the vehicle has been inspected and accepted by UTA, the GCO from the 5310 offices will contact the subrecipient and walk through DMV steps and accepting the vehicle. Subrecipient must provide a **PAPER CHECK** for local match at time of pick up, and proof that they have extended insurance coverage to the vehicle they will be receiving.

Prior to subrecipient receiving the vehicle they must complete RidePilot training, and mandatory Vehicle Grant Management training (post-award training 1.2).

Subrecipient accepts vehicles

Upon the subrecipient obtaining registration and license plates, the CMGA or GCO will meet the subrecipient at the UTA Riverside location.
The subrecipient is given an instruction form for steps to take after the vehicle is accepted to prepare it for service, and rules for disposal. Subrecipient is given at least **two keys** at delivery. A spare key will be retained by the UTA Coordinated Mobility Office. If two keys are not provided at delivery, UTA GCO will work with you on getting your second key.

Subrecipient gives:
- Local Match Check
- Agrees to submit invoice in ZoomGrants with the Federal Amount of vehicle

CM employee gives Subrecipient:

- Instruction Form for Vehicle Preparation
- How to submit vehicle invoice in ZoomGrants
- Instructions on disposal rules and regulations
- Two sets of Keys
- Any needed safety kits, fire extinguisher, or decals missing from vehicle or not provided from vendor
- Federal asset and vehicle height sticker if needed
- A clipboard with accident forms

Subrecipient steps after receiving vehicle

- Make sure you have all the required items in the vehicle. Civil rights notices should include ADA and Title VI notice to public, including a translation in any language in your area with over 5% population identified in your Language Assistance Plan. You must also have a decal that notifies the driver what the height of the vehicle within the driver's line of sight.
- You must print out accident report forms and have them in the vehicle. We recommend including a pen and clipboard. UTA supplies these items at the initial delivery of your vehicle. In the case of an accident it is your responsibility to notify UTA within 24 hours and provide the accident form. These can be found on our website under resources.
- Ensure you have everything required in your safety kit. Fire extinguisher, seat belt cutter, triangles, etc.
- Vehicle registration and insurance should always be kept up to date and in the vehicle
- Vehicle "placed into service" date must be entered in RidePilot as a "compliance event" and added to your quarterly report,
- Odometer and License Plate number must also be added in RidePilot
- Vehicle invoice on ZoomGrants must be submitted with a copy of proof of match payment, and match payment invoice, and vendor's invoice showing total vehicle cost, then the GCO will mark it as "paid".

Vehicle Invoice in ZoomGrants

After you have picked up your vehicle, and before you place it into service, you must upload the vehicle invoices to ZoomGrants.
To complete this invoice, you need to log onto your ZoomGrants account and click the Reimbursements tab. This process will be similar if not identical to the payment reimbursement request process we covered in chapter 3. Click create an invoice, and for the 'amount requesting' you will put the amount the grant is paying for your vehicle (80% of the total cost) The total cost of the vehicle is available on the vendor's invoice, and the local match invoice will list the amount you paid and the VIN. You do not need to worry about including total cost of local match amount on this invoice. You may attach the local match invoice you were sent to the 'documents' section of the ZG invoice. After you submit, and once you receive your vehicle, the GCO will mark that invoice as 'paid' indicating that your vehicle was received, and that money has been spent down from the grant award.

Vehicle Insurance

All vehicles must have proof of insurance cards up to date. UTA must have a copy of your insurance coverage plan with amounts and showing UTA as the lien holder. Unless the agency in question is self-insured, wherein they must provide a signed letter that states UTA is the lien holder on the vehicle.
COIs and insurance cards must remain current and be provided when requested.

Minimum coverage required:

Automobile Liability
Bodily Injury and Property Damage for any owned, hired, and non-owned vehicles used in the performance of this Contract.

Combined Single Limit (CSL) $2,000,000
The policy shall be endorsed to include the following additional insured language: "The Utah Transit Authority shall be named as an additional insured with respect to liability arising out of the activities performed by, or on behalf of the Subrecipient, including automobiles owned, leased, hired or borrowed by the Subrecipient"

4.2 RidePilot, Reporting and Maintenance

RidePilot Lite is the online management system UTA has helped create for subrecipients to track their vehicle assets. This helps subrecipients report to UTA, and UTA report to the FTA how your vehicle is being utilized and its condition. Before receiving your vehicle, your agency will need to have 1:1 or group training with our RidePilot Lite specialist. They will train you on how to track trips, how to track individuals served, how to report maintenance events and preventative maintenance, and upload receipts and documents. Our Compliance Officer will check that you are reporting your trips correctly and they are also available to answer questions or help with vehicle compliance training.

Pre/post trip inspections

Before and after a trip your driver must perform a pre/post trip inspection. We have templates on our website that have more detail, and you can make your own pre-inspection as long as it contains these minimum requirements:

- Date
- Driver identification
- Vehicle walkaround (looking for damage, low tires, mirrors, stickers, posters, windows, etc.)
- Lights/flashers/blinkers
- Cycle and inspect lift or ramp (if accessible vehicle)
- Lift cycle odometer/counter (and something that indicates lift must be cycled in the pre-trip, like a checkbox)
- Begin odometer
- End odometer
- Notes or comments section

Completed inspection forms must be kept in a place that is easily accessible, to provide proof during an audit. This can be digital or kept in a file cabinet and must be kept for 3 years after the grant is closed out.

4.3 Vehicle Maintenance

Subrecipients must follow UTA-approved preventive maintenance schedules based on manufacturer recommendations, warranty requirements, UTA policy, and any applicable federal/state requirements. You can find your vehicle schedule in RidePilot under the 'Scheduled Maintenance' heading. If a schedule is missing, email Clint Wilkinson to ensure a maintenance plan is posted for your vehicle. Your schedule is a requirement under 49 CFR Part 396. Each vehicle schedule will have different requirements based on manufacturers' recommendation. If you have a vehicle with a wheelchair lift, your lift will also have preventative maintenance requirements you will need to follow.

Maintenance events will also need to be recorded and reported in RidePilot. This is anything that is not on the preventative maintenance schedule such as fixing a dent, replacing a mirror or a lightbulb, repairing a

flat tire or replacing a tire. You must upload receipts and invoices of maintenance events and preventative maintenance into RidePilot.
Preventative maintenance plans (or schedule) should be within 90% of the manufacturer's recommended timelines and should include any required warranty service or inspections. Record-keeping should include a file with copies of all procurement documents, such as the purchase order, manufacturer's specifications and warranty, and a schedule of inspections, service, and repairs which were done for the equipment and/or vehicle. These records must be maintained as long as the equipment/vehicle is used in the service or program it was purchased for, plus three additional years.

4.4 Vehicle Inspection



Every quarter UTA will do a desk review of your RidePilot reporting on vehicles. We check miles traveled, how often you are reporting, if any vehicles are due for preventative maintenance, and that you are uploading proper documentation with maintenance events.
Every two years your agency will receive an onsite vehicle inspection, performed by a UTA maintenance employee. On the years UTA does not inspect your vehicles, you must perform your own vehicle inspections on all 5310 funded vehicles. You are welcome to use our vehicle inspection form available on the 5310 webpage under 'resources'. This will ensure you are prepared for our onsite vehicle inspection.
Things we will check during our onsite inspection include: Exterior condition, safety equipment, interior condition, proper signage (height, Title VI, Emergency Exit, etc.), lift condition, proper Q'straints and seat belts, understructure condition, front suspension, and battery compartment.

UTA will determine inspection, reporting, and inventory requirements after useful life based on asset status, condition, and disposition status.

4.5 Driver Training and Accidents

Training videos can be found:
nationalrtap.org on the eLearning page
And 'Utah UZA's FTA 5310' YouTube channel

<u>All drivers must complete the following trainings:</u>
- ADA and Sensitivity
- Bloodborne Pathogens

- Customer Service
- Defensive Driving
- Distracted Driving
- Drugs and Alcohol
- Emergency Management
- Passenger Safety
- Transporting Non-Ambulatory Passengers
- Transit and Human Trafficking
- Problem Passengers: Managing Difficult Passengers and Situations

For Maintenance:

- Top Shops: Emergency Management
- Top Shops: Instructor Led Training (ILT) course

For Grant Managers and Fleet Managers:

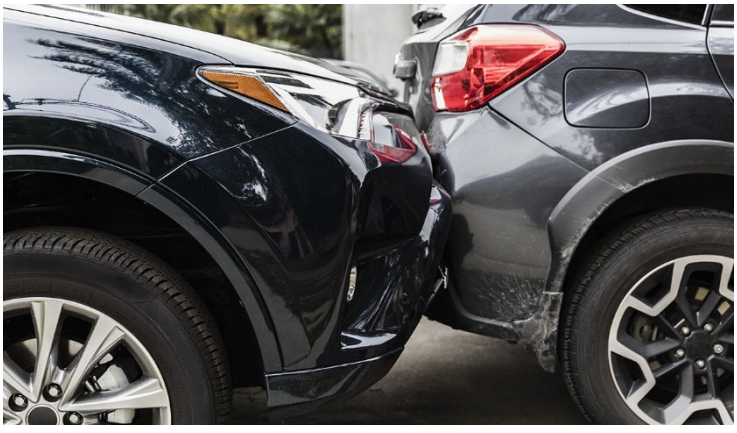
- UTA Application Workshop
- UTA Vehicle Workshop
- UTA Grant Management Workshop
- UTA RidePilot Training
- Transit and Human Trafficking
- ADA and the FTA: Improving Access for People with Disabilities
- FTA Drug Abuse Awareness Video
- Reasonable Suspicion Training for Supervisors
- FTA 101: An Introduction to the Federal Transit Administration
- Title VI Program Requirements for FTA Grantees

Vehicle Safety Standards:

Additionally, your agency must have the following policies and procedures.

- Drivers must be retrained every 2 years, but UTA recommends some type of short retraining program annually.
- Agency management commitment to safety. Examples may include safety policies, an agency safety committee, a safety communication program for the workplace (such as posters, safety bulletins, safety meetings, etc.), and workplace procedures that include safety elements
- Operational on-board safety equipment, including fire extinguishers, first aid kit, web cutter, bio-hazard kit, road warning triangles, based on agency policies
- Ensure communications equipment is working properly and that back-up procedures are in place for emergency communications in areas of poor coverage or “dead spots”

- Driver training for the safe transport of all passengers, including service animals, should include special needs passenger assistance, proper restraints for children, responding to passenger and vehicle emergencies, and requirements for seat-belt use
- Driver training for transporting special needs individuals, including lift operation, storing portable oxygen tanks, securing wheelchairs and non-traditional personal mobility devices, and any other specialized driver training required by the agency
- Driver first aid and CPR training should include procedures for dealing with potential blood-borne pathogen spills inside a vehicle
- Vehicle pre-trip and post-trip inspections as outlined section 4.5 of this handbook
- Driver training for driving under challenging conditions such as winter storm driving, techniques for driving in heavy rain, snow and ice, night driving, left turns at intersections, driving in heavy winds, etc. (Optional but strongly recommended.)
- Procedures for vehicle breakdown and unavoidable stops, including safe vehicle evacuation and grouping of passengers outside of the vehicle
- Safety procedures for bus storage and vehicle maintenance facilities, if the agency operates such facilities, covering both the operation of vehicles inside the facilities, and the safe use of equipment
- Procedures and policies for responding to all hazards, including evacuations, as established by the agency's policies and procedures, and in coordination with emergency first responders in the area. Agencies are encouraged to establish inter-agency agreements and to define how vehicles might be deployed in the event of an emergency - what agency will be providing drivers, what insurance coverage would be in place, and which procedures are in place in advance.
- Your agency must have written policies and procedures in place to prevent loss, damage, and theft of vehicles.
- You must always secure keys when they are not being used in the vehicle.
- Your agency must have a policy outlining that a driver cannot deny service if a wheelchair cannot be secured. You must have a policy on what to do if wheelchair cannot be secured (such as using extra straps, calling for a different vehicle, etc.)
- Vehicles will be inspected by UTA every two years.



If an accident or incident (any significant damage to the vehicle) occurs your **agency must report it to UTA within 24 hours**. You must also fill out an accident report and send us a copy. You will also need to send us any police reports. You can use your own accident report if it contains similar information as our template. We recommend keeping a clipboard, pen, and incident reporting forms inside the vehicle at all times.

Agency must upload ALL documents and photos into RidePilot within 30 days of the incident. Once repair is complete, agency must include new photos and receipts proving the vehicle's condition was repaired.

In the unlikely event that the vehicle is a complete loss, UTA will need to work with your agency's insurance company with regards to proceeds. Please contact UTA as usual and let us know so we may follow correct protocol.

4.6 Useful Life and Disposal

Agencies are required to notify UTA if the vehicle has been out of service for 90 consecutive days. Agencies are required to notify UTA when the subrecipient can no longer use a vehicle, if the original purpose for the vehicle changes, the service is terminated, the transit project ends, or the agency is closing or no longer providing transportation. If the project is at an end or an agency closes and useful vehicle life remains, UTA will transfer the vehicle to another eligible agency.

Disposition proceeds will be handled in accordance with current FTA requirements, 2 CFR Part 200, FTA award management guidance, and UTA policy in effect at the time of disposition

The useful life of all vehicles we award is typically 4 years or 100k miles, whichever comes first. Useful life is a minimum eligibility point for disposition review, not automatic approval. Subrecipients must request UTA approval before sale, disposal, transfer, or title release. Disposition proceeds will be handled in accordance with current FTA requirements, 2 CFR Part 200, FTA award management guidance, and UTA policy in effect at the time of disposition

4.7 Asset Securement and Tracking

Your agency must keep record of specific items related to the grant, in an asset inventory. You MUST include the items listed below in your inventory or use the spreadsheet template we have available. Your agency must have a written policy to update this inventory annually.

For vehicles:

- Vehicle type
- Agency vehicle ID (Name in RidePilot)
- VIN
- Model and year
- Date placed into service
- Mileage
- Seating capacity
- Accessible (yes/no)
- 5310 funded (yes/no)
- Holder of title (yes/no)
- Useful Life
- Adequate insurance (yes/no)
- Total Cost
- Federal % (or federal amount and local amount)
- Grant Number
- Location
- Use and Condition (use condition rating)

- Disposition Method (if applicable)
- Replace (yes/no)

For equipment such as lifts, radios, cameras, bus stops, shelters, etc. your inventory must include:

- Agency's internal equipment ID number
- Year of manufacture
- Equipment condition
- Serial Number
- Date placed into service
- Total purchase cost including federal share and local share
- Useful life
- Date removed from service (if applicable)
- Disposition method (if applicable, e.g., "auction sale")

Bus Shelters, Signs, or Amenities

- Facility/item location – the street address, or nearest cross-streets and side of street (North, South, East, West) where the shelter or amenities are located.
- One sentence description of the asset.
- Identifying inventory property tag number or item code assigned by the local agency.
- Month and year of installation.
- Original cost of facility/item, including applicable federal share, and local share
- Current condition and remaining grant replacement useful life

Structure and Facilities:

- Facility name (if applicable) and address.
- The full name of the facility as it appears on the legal deed (e.g., "City of Centerville, Davis County Transit Facility") and the legal street address.
- Brief general facility description including purpose/function of the facility, transit programs served, number of floors and square footage.
- Facility number or code assigned by the local agency.
- Facility occupancy rating by local or state fire marshal.
- Date the occupancy permit allows facility to be used.
- Original total cost of facility, including applicable federal share, and local share. If real estate acquisition was part of the grant project, that cost should be included in the total project cost.
- For facility renovations: Date completed, square footage, and project cost of all major facility renovations or additions, including federal grant shares, if funded in a 5310 grant.
- A list of the major building infrastructure equipment systems, including (but not necessarily limited to) elevators, central fans/blowers, HVAC chillers and heaters, cooling towers, emergency power generators, and waste disposal equipment – including manufacturer's serial numbers.
- Current building condition

For determining "Condition" please use UTA's five-point rating system:
(if your agency uses a different rating system that is fine, just include it as part of your asset tracking so we know what rating system you are using)

1 - Excellent = Asset new or nearly new 75% - 100%, the asset is still new or like new with no visible defects.

2 - Good = Asset nearing or at its midlife point 50%-75%, the asset is showing minimal signs of wear and may have some slight defects or deterioration. May include rehabilitated vehicles restored to good condition.

3 - Adequate = Asset has passed its midlife point 25%-50%, some minor to moderate defective or deteriorated components, there are expected maintenance needs.

4 - Marginal = Asset nearing or at end of its useful life 0%-25%, increasing numbers of defects, including deteriorating components, growing maintenance needs and cosmetic flaws. Repairs are beginning to exceed normal maintenance schedules.

5 - Poor = Asset passed its useful life with high mileage, asset in need of replacement or restoration such as engine or transmission overhaul needed to keep the vehicle in service, may have critically damaged components and major mechanical or cosmetic flaws. Non-maintenance repair happening frequently and becoming more costly.

Asset Securement

UTA maintains official capital asset records and may request inventory updates, photos, condition information, and location verification to reconcile asset records.

It is your agency's responsibility to have policies and procedures in place that prevent loss, damage, or theft to your vehicles and/or equipment purchased with 5310 funds.

Your agency must:

- Have a system in place for checking out and returning keys
- Keep keys in a secured location when not in use
- Keep vehicles in a secure location when not in use
- Have written policies and procedures to avoid loss, damage or theft
- Have written cell phone policies
- Have written seatbelt policies
- Have consequences for drivers who do not follow such policies
- Have written policies for inspections and checks, and asset inventory updates
- Have policies for annual inspection
- Have policies for completion and retainment of pre/post trip inspections

"Secure location" for our purposes, is defined as a safe access restricted repository.

Ideas for acceptable security measures:

- Cameras around parking facility
- On site security guards or security monitoring
- An enclosed gated area with a lock
- Adequate night lighting

5. Site Visits and Risk Assessments

5.1 Site Visits

External audits cannot be your internal control. It is your responsibility to know if you are compliant before an audit, and it is our responsibility as the Pass-Through Entity (PTE) of your grant funding to help your agency be compliant. If your agency is found non-compliant by an external auditing agency, we (PTE/UTA) will be held accountable. Therefore, it is in our best interest to do everything we can to assist you and educate you on compliance.
UTA will perform site visits, desk reviews and vehicle inspections to help your agency ensure compliance, improve performance, and reduce risk. The frequency and type of compliance monitoring is based on the subrecipients level of risk, project type, and circumstances.

During a site visit we check your accounting systems, your training, your policies, and may request to interview some of your staff or check on equipment.

After our site visit is complete, we will send the subrecipient a formal letter with our findings and/or recommendations. In this letter we will identify the problems, communicate the issues, and make recommendations. We will also include a time frame in which the subrecipient has to make changes, typically this is 30 days. If it is an urgent matter, it may require more immediate attention. Other items may require the subrecipient to write their own Corrective Action Plan (CAP) and UTA will hold them to that plan.
If agency fails to respond to Action items within 90 days, they will be placed on a CAP for 1 year.

<u>Other Audits</u>

Outside of our site visits, as a subrecipient you should be prepared to receive an external audit at any time. Every three years FTA Triennial Reviewers and Regional Staff audit the PTE agency (UTA) and at that time subrecipients may be selected for a visit from the FTA, especially if they are a high-risk agency. UTA will try and give prior notification when FTA is visiting. Other government agencies can also audit subrecipients, such as the Inspector General or the Government Accounting Office (GAO).

During an external audit, you may receive a finding or a recommendation.

Findings vs Recommendations:
Finding = breaking the law, regulations, or agreement policy
Recommendation = area of concern, no compliance violation, could become a finding if not addressed

It is wise to provide any internal audit reports to the external auditor. Also, if you are aware of any areas you are non-compliant in, bring them to the attention of the auditor up front showing that you have an action plan in place to remedy the issue.

Corrective Action Plan

A CAP should include deficiencies identified, a timeline, and a detailed plan to correct issues.

If a CAP is not followed, or met, UTA may take remedies allowed under federal regulations and the subaward agreement, including withholding payments, imposing conditions, requiring corrective action, termination, or reporting matters through applicable federal integrity/performance systems when required.

If the subrecipient completes their CAP and remedies any findings, PTE will send a second letter notifying that subrecipient is complying and has made changes that the PTE finds acceptable. All correspondence on these matters will be saved and documented. The CAP process should be similar within any other external government agencies.

Extension

Some delays in correcting findings may be acceptable for an extension. An extension may be requested in writing and approved by the PTE or other external government agency.

Excusable delays: must amend an agreement, natural disasters, act of public agency, awaiting board approval

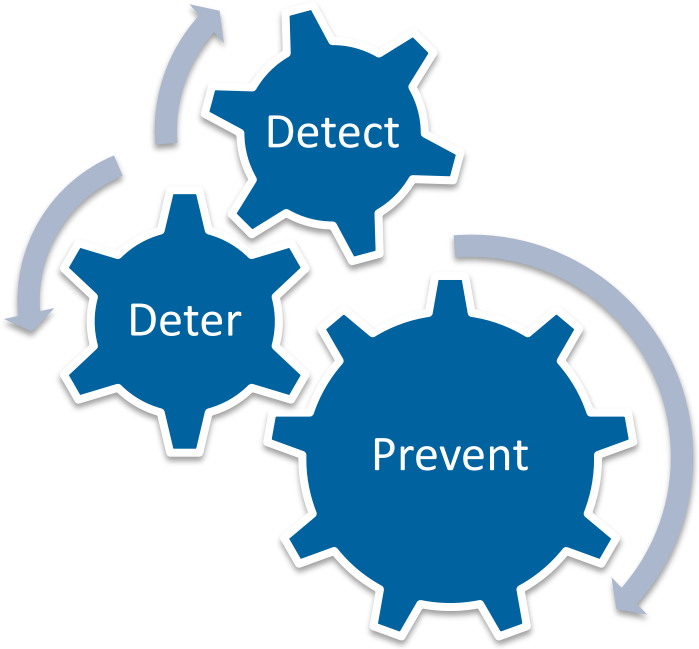
Non-excusable delays: cash flow problems, inadequate equipment, back order procurement problems, lack of knowledge due to personnel turnover

Most common compliance issues

To help subrecipients identify risk or noncompliance ahead of time, here is a list of the most common compliance problems UTA and FTA see.

- Not submitting quarterly reports on time
- Not using Ride Pilot consistently
- Not recording Preventative Maintenance in RidePilot correctly
- Not responding to written communication
- Title VI plan deficiencies
- Not billing for operations regularly (quarterly) – more and more auditors are looking at this. UTA needs to be reimbursing your operations regularly and not all at once at the end of the grant.
- High turnover without training new employees on grant requirements
- Lack of written policies
- Lack of project goals and milestones to evaluate success of project – these should be written in your application and grant agreement, and evaluated in your quarterly reports

Ultimately UTA is held responsible for your success, so we need your cooperation to comply with federal guidelines. We have incentive to help you succeed! Other subrecipients also depending on your compliance to receive consistent grant funding.



5.2 Risk Assessment

A risk assessment is a tool the FTA requires to determine a subrecipient's level of risk. We use a scoring system to evaluate your risk. Monitoring levels and monitoring needs are established by the Pre-Award Risk Assessment, which is completed by the subrecipient during the Pre-Application prior to the grant being executed. Grantees will fall into one of the following risk areas: Low, Medium and High Risk. After awards have been made, a Post-Award Risk Assessment will be completed by a UTA Coordinated Mobility staff member and compared to the subrecipient's review of their own risk.
(For more on-site visits, see section 5.1)

What is a risk? A risk may be a change in policy or regulation, a new program, high turnover, large amount of funding with lack of sustainability, inability to meet program goals and milestones, or inexperience managing grants. The reason we have you fill out a risk assessment in the beginning is to help us get an overview of your agency and help you identify your own risks.

Based on the rating scale in the Risk Assessment Form, grantees are placed in one of the following risk areas. Depending on the level of risk, grants will be monitored differently. Below are some examples of how different risk levels will change the monitoring of the agency.

Low Risk
1. Monitoring may be standard or lowered to the PTE's discretion, but will still include Grant Status Reports, Final Report, Vehicle Inspections, and evaluation.

Medium Risk
1. Standard monitoring. Onsite visits, Grant status reports, vehicle inspections, etc.
3. Pending site visit results, UTA could withhold full or partial payments.

4. UTA will provide training and technical assistance on program-related matters.

High Risk
1. Increased monitoring to annual in person site visit.
2. A meeting will be scheduled between UTA and grantee subrecipient the first month of the project start date. Corrective Action Plan may be required.
3. Grant training attendance will be required by two of the following: Authorizing Official, Agency Administrator, Program Manager, or Agency Financial Officer.

5.4. FTA Triennial Review

Every 3 years UTA receives an audit/review similar to your site visit. At this review the FTA will select 1-2 subrecipients to review as well, to ensure UTA is performing site reviews, risk assessments, and overall compliance. If you are selected, they usually will give us a couple of days' notice so we can inform you to be prepared. Sometimes this will include an on-site inspection where they visit your facilities.

5.5. Single Audit Requirements

A non-federal entity that expends $1,000,000 or more in federal awards during its fiscal year must have a Single Audit or program-specific audit conducted for that year.

6. CIVIL RIGHTS

6.1 Title VI

State and local transit agencies receiving Federal Transit Administration (FTA) funds are required to uphold Title VI of the Civil Rights Act of 1964, a landmark piece of civil rights legislation that outlaw's discrimination on the basis of race, color, or national origin. Title VI of the Civil Rights Act specifically states that any programs and activities receiving federal assistance cannot discriminate on the basis of race, color, or national origin. It is essential for all FTA grantees and subrecipients to have a well-planned Title VI program in place to prevent discrimination, promote public inclusion, and have the means to address, avoid, and mitigate any discriminatory actions and activity.

To ensure Title VI compliance, subrecipients should become familiar with FTA's Title VI Circular 4702.1B. This document clarifies and updates FTA's Title VI requirements and guidance. Title VI Programs must be updated at least every three years and submitted to UTA. UTA may request annual status updates or documentation as part of monitoring.

As a subrecipient you have a responsibility to prepare and submit your plan to the grantee or pass-through entity, in this case Utah Transit Authority. Prior to submitting your Title VI plan, the subrecipient must obtain approval from its board of directors, or similar decision-making body.

Developing your Title VI Program

A Title VI program will include:

- A Public Notice in English and Spanish (or whichever language identified in LAP described below), that also contains subrecipient's designated Civil Rights officer contact info as well as UTA's Civil Rights officer's contact information. Notices should be posted in any common areas and vehicles.
- Instructions to the public regarding how they can file a Title VI discrimination complaint with the subrecipient agency, and grantee agency: Utah Transit Authority
- A list of any public transportation-related Title VI complaints, investigations, or lawsuits filed with the subrecipient since the time of the last submission
- A Public Participation Plan
- A Language Access Plan (LAP/ "LEP plan") that includes a Four-Factor Analysis using the most current census data available in your area

If a subrecipient is applying for funds for the first time, and does not have a program, it will be required to provide information to supplement your Title VI Program. First time subrecipients are encouraged to

contact their respective Regional Civil Rights Officer, or UTA's Civil Rights Officer if they need assistance developing a program.

Public Notice

Title VI requires that subrecipients of federal funds notify the public of their rights against discrimination. At a minimum, information must be published on the subrecipient's website, as well as in areas where the public may interact with the agency. Examples of this include displaying posters or providing pamphlets in reception areas, meeting rooms, service areas and inside vehicles.

The notice should state that the agency operates programs without regard to race, color, or national origin and include a description of the procedures that the public should follow to get more information on the Subrecipient's Title VI obligations. The notice must also state procedures for the public to file a Title VI complaint with the agency and with Utah Transit Authority.

Notices are required in all 5310 service providing vehicles, NOT just 5310 purchased vehicles, including vehicles used by third-party transportation providers. You must have a designated officer for taking complaints, and their contact information, along with UTAs civil rights departments email for complaints:

Civilrights2@rideuta.com

Title VI Complaints

To ensure compliance with the handling of complaints, a grantee must develop a procedure for informing, accepting, investigating, and tracking any filed Title VI complaints. Title VI complaint forms must be available for the public's use along with information on how to file a complaint. At a minimum these should be available online.

The next requirement is Recording and Reporting Title VI complaints, Investigations, and Lawsuits. This report must include the date of the complaint, investigation, or lawsuit; a summary of the allegation; status of it and any actions taken.

If subrecipients wish, they can adopt portions of UTA's policies and procedures by finding the resources on the 5310 website or reaching out to our Civil Rights Officer for assistance.

This can include:

- The notice to the public informing them of their Title VI rights
- Procedures on how to file a Title VI complaint, and
- A Title VI Complaint Form.

The subrecipient is still responsible for notifying passengers and other interested persons of their rights, and how an individual may file a discrimination complaint directly with the subrecipient.

If the subrecipient adopts UTA's complaint form and process, they are still responsible for its enforcement, monitoring, and overall management.

Language Assistance Plan

A subrecipient's Title VI program must include a plan for providing language assistance to Limited English Proficient (LEP) persons, which is referred to as a Language Assistance Plan (LAP).
LEP refers to persons for whom English is not their primary language and have a limited ability to read, write, speak, or understand English.

In order to establish a LAP, the subrecipient must first conduct a Four Factor Analysis.
The first factor looks at how many LEP persons are served. When evaluating this factor subrecipients must look at:

- How many and how do LEP persons interact with the agency?
- Who are these LEP communities?
- How many languages do they speak?
- What are the literacy skills of each LEP group in their native languages?
- Are LEP persons underserved due to language barriers?

The second factor to analyze is how often LEP persons come into contact with transit programs. This includes surveying key program areas and assessing major points of contact with the public.

The third factor is assessing what the LEP populations consider essential services, as well as the most effective means to provide language assistance to them. This can be done by holding facilitated meetings with LEP groups.

Lastly, a subrecipient needs to manage resources and costs, consider technological advances, reasonable business practices, and the sharing of language assistance materials and services between subrecipients, advocacy groups, LEP populations and Federal agencies. Subrecipients use the results of the Four Factor Analysis to determine which language assistance services are appropriate in order to develop its LAP.

At a minimum, the LAP should contain:

- The results of the Four Factor Analysis, including a description of the LEP populations served
- A description of how assistance services will be provided by language
- Communication methods to LEP persons about the availability of language assistance
- How the plan is evaluated and updated
- How drivers and employees are trained to provide timely and reasonable language assistance to your LEP populations

A good starting point for LEP communities is to translate vital documents into the language of each frequently encountered LEP group. Failure to translate these vital documents could result in you denying an eligible LEP person access to services and would constitute discrimination on the basis of national origin. Non-vital documents can be translated orally.

Once you understand who your LEP populations are, and you have developed your LAP, you must apply it to your Title VI efforts, including public meetings, surveys and other documents or interactions with the public where you may need to translate information into languages other than English.

Spanish is commonly identified in many Utah service areas, but each subrecipient must use current service-area data and its Four-Factor Analysis to identify LEP language needs.

Eligible LEP groups constitute 5% or 1,000 persons of the total population qualified to be served. (use census data from your area to determine)

Written translation of vital documents is not required if there are fewer than 50 persons in a language group. Written notices should be provided in the primary language of those with Limited English Proficiency about their right to receive competent oral interpretation of those written materials, free of cost.

Title VI Compliance Monitoring

UTA must monitor subrecipients to ensure that they are carrying out their plans as documented. This is important because if a subrecipient is not in compliance, then neither is the primary recipient. UTA must document its process to ensure that all subrecipients are complying with the reporting requirements. UTA is required to establish a schedule to collect and review its subrecipients Title VI program. UTA will collect and review Title VI plans annually in the fall. For all civil rights complaints or lawsuits, subrecipients must report to UTA in their quarterly report at least annually and include resolutions.

Title VI for facilities only (not vehicles)

When a subrecipient is planning to site a facility, it has to conduct a Title VI equity analysis to ensure that the site location was not determined with regards to race, color or national origin. Examples of facilities include operation centers and storage and maintenance facilities. They do not include bus stations, transit stations, or power substations, as these are evaluated during project development and the NEPA process.

This Equity Analysis must occur during the planning stage before the selection of the preferred site and must compare the equity impacts of various site alternatives and must notice and conduct outreach to potentially impacted populations. Attention should be paid to other facilities in the preferred area, as there may be cumulative adverse impacts if an additional facility is built.

To ensure proper perspective is used in the analysis, grantees should utilize the Census tract or block group data. If the grantee determines that the location will result in a disparate impact on the basis of race, color, or national origin, it may only locate the facility there if there is a substantially legitimate justification to do so. The grantee must have analyzed the alternatives and found that there are no other locations that will have a less disparate impact.

Further Research and Resources

For more information on Title VI Programs, and to view sample checklists, templates, standards, etc., see the ***"Title VI Requirements and Guidelines for Federal Transit Administration Recipients" circular,***

FTA C 4702.1B (effective October 1, 2012). You can also find samples on our website at ***http://www.utahridelink.org/5310-Grant/5310-Resources***

6.2 Equal Employment Opportunity (EEO)

Equal Employment Opportunity (EEO) refers to statutes and regulations that prohibit employment discrimination and provide employees and job applicants protections and remedies against employment discrimination. These protections and remedies were established under a series of Federal laws ***(https://www.eeoc.gov/laws/statutes/index.cfm)*** that are enforced by the U.S. Equal Employment Opportunity Commission. These laws prohibit discrimination against a job applicant or an employee on the basis of race, color, religion, sex, pregnancy, gender identity, sexual orientation, national origin, age (40 or older), disability or genetic information. It is also against the law to discriminate against a person because the person complained about discrimination, filed a charge of discrimination or participated in an employment discrimination investigation or lawsuit. EEOC regulations are detailed in 29 CFR Parts 1600-1699 (see EEOC website ***(https://www.eeoc.gov/laws/regulations/index.cfm))***.

As stated in FTA Circular 4704.1A, "EEO Guidance" ***(https://www.transit.dot.gov/regulationsand-guidance/civil-rights-ada/eeo-circular)***, "Under Federal Transit Laws, FTA is responsible for ensuring that its recipients do not engage in employment discrimination:
A person may not be excluded from participating in, denied a benefit of, or discriminated against under, a project, program, or activity receiving financial assistance under this chapter because of race, color, religion, national origin, sex, disability, or age. (49 U.S.C. 5332(b))"
To ensure non-discrimination in employment, FTA requires FTA applicants, recipients, subrecipients, and contractors that employ 50 or more transit-related employees: 1) request or receive capital or operating assistance in excess of $1 million in the previous Federal fiscal year, or 2) request or receive planning assistance in excess of $250,000 in the previous Federal fiscal year must prepare and maintain an EEO Program.

<u>For Subrecipients that have less than 50 employees</u>

Organizations that do not meet the FTA EEO Program thresholds are not required to submit an EEO Program to FTA, but they are still required to comply with all applicable EEO statutes and regulations. This includes having a process for accepting, investigating, and resolving EEO complaints including directing individual complaints to the EEOC (required under 29 CFR Part 1691***(https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title29/29cfr1691_main_02.tpl))***. Employers must post EEO notices visible to employees, applicants for employment and union members (29 CFR Section 1601.30).

As a best practice, FTA recipients and subrecipients that do not meet the thresholds triggering an FTA EEO Program should nonetheless adopt an EEO statement of policy, disseminate the policy internally and externally and designate an EEO officer.

6.3 Americans with Disabilities Act (ADA)

UTA requires subrecipients and 3rd party transportation contractors to develop and maintain an **ADA Demand Response Service Plan** with reasonable modification, complaint resolution, accessible public information, ADA notices, ADA Coordinator/contact, and complaint retention.
A template can be found on our resource page, or NRTAP.org.

For More on ADA requirements please visit
https://www.nationalrtap.org/Toolkits/ADA-Toolkit/Welcome
and download the ADA toolkit

6.4 Other Federal Requirements

- Subrecipients must maintain an active/accurate UEI and SAM.gov information as applicable and notify UTA of legal name, address, UEI, or organizational changes.
- SAM.gov exclusion checks must be completed and documented before federally funded third-party contracts/purchases, as applicable.
- PMP requires subrecipients to notify UTA of credible evidence of federal criminal law violations involving fraud, conflict of interest, bribery, gratuity, or civil False Claims Act violations.
- Ask UTA for permission before using Medicaid-related revenue as match.

7. RESOURCES

7.1 UTA CONTACTS

Coordinated Mobility Department

Trista Lawrence
Coordination Administrator
(801) 287-2750
tlawrence@rideuta.com

Christy Allen
Coordinated Mobility Manager
801.237.1921 (Office)
801.673.5550 (Mobile)
cachziger@rideuta.com

7.2 INTERNAL RESOURCES

5310 Resources Page
https://rideuta.com/Doing-Business/FTA-5310-Grant-Program/5310-Resources

Local Coordinated Council

Local Coordinating Councils (LCCs) were established as forums to coordinate transportation efforts, foster partnerships and to create and implement locally developed plans and projects. The council membership includes:

- Government Agencies
- Non-profit Human Transportation Providers
- Private Companies
- Citizen Members
- Utah Transit Authority (UTA)

LCC meetings are held on a bi-monthly (every other month) basis. Meetings are typically held in February, April, June, August, and October
Periodically there will be a final summit or retreat held in November.

All subrecipients MUST attend and participate in the LCC meetings within the UZA they are applying for funds in. LCC meeting attendance will give you more points on FTA 5310 applications and allow you opportunities for collaboration and partnerships with other transportation providers and not for profit agencies in your area.
To get onto the mailing list, contact **Trista Lawrence tlawrence@rideuta.com**

https://rideuta.com/Rider-Info/Accessibility/Accessible-UTA/Coordinated-Mobility/Local-Coordinating-Councils

The three local councils for the Wasatch Front represent the areas of:

- Provo-Orem UZA
- Ogden-Layton UZA
- Salt Lake UZA

Local Coordinated Human Service Transportation Plans

The councils lead the development and update of Local Coordinated Human Service Transportation Plans. The plan identifies "the transportation needs of individuals with disabilities, older adults, and people with low incomes, provides strategies for meeting those local needs, and prioritizes transportation services for funding implementation."

Individual plans are developed for each county/region by the Local Coordinating Councils that identify the local mobility needs and strategies to resolve those needs.

Project Management Plan

The Program Management Plan (PMP) outlines UTA's policies and procedures for administering FTA 5310 funds. The contents of the PMP have been coordinated with the Transportation Improvement Program (TIP), such as: coordination of service, project selection criteria, and method of distributing funds. The PMP was developed under the guidance provided in FTA Circular 9070.1H.

UTA's PMP can be found and downloaded on our website.

The PMP outlines UTA's goal to fulfill the following objectives:

- Identify, contact and inform public agencies, community organizations, non-profit and private for-profit organizations providing services for seniors and persons with disabilities as to the availability of 5310 program grant funds:
- Establish, promote and outline processes for soliciting and evaluating 5310 program funding proposals:
- Assure that proposals selected for funding are responsive to one or more of the needs identified in the **Local Coordinated Human Service Transportation Plans.**
- Assure that the application, evaluation and project selection process ensure fair and equitable distribution of funds within each Urbanized area;
- Establish the requirements for the selected projects to enter into grant agreements with UTA and,
- Summarize the requirements for managing and reporting the progress for implementing the funded projects.

ZoomGrants Announcements

In your ZoomGrants account we will occasionally post important dates, training opportunities, or even other grant opportunities in the 'Announcements' section. Check announcements when you log in to complete your reports or invoicing.

YouTube "Utah UZA's FTA 5310"

You can also access recorded training videos on our YouTube page for training.
https://www.youtube.com/@CoordinatedMobility5310
– Subscribe to receive alerts!

7.3 EXTERNAL RESOURCES

Federal Circulars

Uniform Guidance, all Federal Grants, 2 CFR 200: https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200?toc=1

Award Management Requirements, FTA C 5010.1F:
https://www.transit.dot.gov/sites/fta.dot.gov/files/2024-10/C5010.1F-Circular-11-01-2024_0.pdf

5310 Program Guidance and Application Instructions, FTA C 9070.1H:
www.transit.dot.gov/sites/fta.dot.gov/files/2024-10/C9070.1H-Circular-11-01-2024.pdf

Utah's Urban and Rural Specialized Transit Association (URSTA)

URSTA is a statewide organization that began in 1988. URSTA provides training, education, advocacy and networking for transit providers and their employees in Utah and surrounding states. URSTA is dedicated to improving public transportation in all Utah communities.

URSTA typically holds a conference in the Fall (September)that offers training topics for managers and drivers. Scholarships are also available to cover the registration fee and hotel accommodations for the conferences.

For more information visit: www.ursta.org

National Rural Transit Assistance Program (NRTAP)

National RTAP is an amazing resource for transportation programs. They offer driver trainings through their e-learning portal, resources for developing transportation programs, and great resources for programs that receive Federal funding.

National RTAP provides research and technical assistance related to the rural and tribal transit industry. Services include help finding training materials, documents, regulations, reports, and other types of information, as well as connecting you to experts in the field.
The goals of the RTAP program are to promote the safe and effective delivery of public transportation services in rural areas and to facilitate more efficient use of public transportation resources. To meet those goals, the program focuses on the following objectives:

- Improving the quality of training and technical assistance resources available to the rural transit industry
- Encouraging and assisting state, local, and peer networks to address training and technical assistance needs
- Promoting the coordination of transportation services
- Building a national database of information about the rural transit industry

Since its inception, National RTAP has contributed to the achievement of these objectives at the national level by developing and distributing training materials, providing technical assistance, creating web-based applications, producing reports, publishing best practices, conducting research, and offering peer assistance for rural and tribal transit providers and state RTAP programs.

Find out more at: nationalrtap.org

National Grants Management Association (NGMA)

NGMA connects professionals in the grants management field to improve and unify the grants delivery process. NGMA brings together the professionals involved in this process so that they may learn from each other. NGMA supports the complete, evolving process of grants management across all levels — from the grantor to the grant recipient — and everyone in between and beyond.

NGMA holds an Annual Grants Conference, and has also developed credentials for Certified Grant Management Specialists (CGMS).

Find out more at: ngma.org

Grants Professional Association
https://grantprofessionals.org/default.aspx

Thompson Grants
https://www.thompsongrants.com/