



Program Management Plan Subrecipient Guide

Section 5310 Enhanced Mobility of Seniors and Individuals with Disabilities Program

Update: March 2, 2021

Regional Transportation Commission of Washoe County
1105 Terminal Way
Reno, Nevada 89502
Tel: (775) 348-0400
Fax: (775) 324-3503

INTRODUCTION

Title 49 USC 5310 authorizes the formula assistance program for the *Enhanced Mobility of Seniors and Individuals with Disabilities Program*. The Federal Transit Administration (FTA) refers to this formula program as “the Section 5310 program.” FTA apportions the funds annually to States and/or Designated Recipients based on an administrative formula that considers the ratio of the number of seniors and individuals with disabilities in rural areas (under 50,000), small urbanized areas (50,000 – 200,000), and large urbanized areas (over 200,000.) These funds are subject to annual appropriations.

The Regional Transportation Commission (RTC) as the Metropolitan Planning Organization (MPO) is the Designated Recipient for the State to disburse these funds. The RTC is a cooperative regional board comprised of five representatives appointed from three government jurisdictions:

- Two Reno City Council Members
- One Sparks City Council Member
- Two Washoe County Commissioners

The RTC Board has the final authority for project selection and funding determinations for Section 5310 grants.

This *Program Management Plan (PMP)* describes how RTC administers the Section 5310 program and coordinates with other providers in the region to ensure coordinated, effective provision of service that meets federal and state requirements.

Title 49 USC 5310(e)(2)(A) describes project selection and plan development requirements. Before receiving a grant under Section 5310, RTC must certify that:

- I. The projects selected by the RTC are included in a locally developed, coordinated public transit-human services transportation plan (CTP);
- II. The plan described in clause (I) was developed and approved through a process that included participation by seniors, individuals with disabilities, representatives of public, private, and nonprofit transportation and human services providers and other members of the public; and
- III. To the maximum extent feasible, the services funded under this section will be coordinated with transportation services assisted by other Federal departments and agencies, including any transportation activities carried out by a recipient of a grant from the Department of Health and Human Services.

The FTA who holds responsibility for national implementation of Title 49 USC 5310, has provided further program guidance in *FTA Circular C 9070.1G*. Guidance in the circular elaborates upon the intent of the program, interprets provisions, and establishes additional requirements for designated recipients, direct recipients, and subrecipients of Enhanced Mobility of Seniors and Individuals with Disabilities Program funding. The development of this *Program Management Plan/Subrecipient Guide* (PMP) is included among these additional requirements. Therefore, the contents of this plan must comply with *FTA Circular 9070.1G*, and satisfy the FTA requirement for its development. The FTA circular and the PMP are available on RTC’s website at www.rtcwashoe.com.

PROGRAM MANAGEMENT PLAN

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Goals and Objectives

The 5310 program will support the goals and strategic objectives found in the RTC developed **Coordinated Human Services Public Transportation Plan (CTP)**. These goals represent a regional strategy to increase personal mobility and travel options for those with special transportation needs in the Reno-Sparks region, including seniors and individuals with disabilities.

The goal of the PMP is to describe the RTC's process for managing the FTA 5310 program. As part of this process, RTC intends to fulfill the following objectives:

- Identify, contact and inform public agencies, community organizations, non-profit and private for profit organizations providing transportation service 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 CTP;
- Establish the requirements for the selected projects to enter into grant agreements with RTC; and,
- Summarize the requirements for managing and reporting the progress for implementing the funded projects.

This PMP is a living document. It will be updated as necessary to incorporate any expansions and enhancements of the 5310 program, as well as any revisions to the programs' management, requirements or guidelines.

Roles and Responsibilities of RTC

As the MPO, RTC is the Designated Recipient for 5310 funds allocated to the Reno/Sparks urbanized area of Washoe County. RTC's role includes administering, managing and programming these funds, and selecting and monitoring the implementation of funded projects as outlined in the PMP. RTC also has a responsibility to announce a call-for-projects and provide technical assistance in the completion of grant applications. Moreover, it is RTC's responsibility to ensure that all interested parties have a fair and equitable opportunity to apply; and if selected, receive a fair and equitable distribution of funds. Once funds are distributed, RTC ensures that all selected grant recipients comply with guidelines as defined by the FTA and any state or local authority, and oversees project audit and closeout.

Coordinated Human Services Public Transportation Plan

This plan, developed and maintained by the RTC, lays out various recommended approaches for maximizing the potential benefits that can be derived through the coordination of services. RTC emphasizes the coordination of services among the region's stakeholders and eligible subrecipients of funding from the 5310 program. Accordingly, applicants must describe their project level coordination arrangements prior to being considered for grant funding. RTC also encourages the efforts of the region's stakeholders to streamline arrangements prior to being considered for grant funding and expand the eligibility of projects and services that could be funded by the 5310 program.

RTC's last Coordinated Human Services Public Transportation Plan (CTP) was completed in December 2020 to align with the cycle of the RTC's Regional Transportation Plan (RTP) latest development (i.e. 2050), as well as future updates.

Under restrictive outreach guidelines during the COVID-19 pandemic, the 2020 update was derived from the efforts of local stakeholders and the public. It is meant to provide information to the general public, local jurisdictions, and agencies so they may develop eligible transportation projects to meet the transportation needs of the elderly, those with disabilities. It provides the means and mechanisms to apply for federal funding for such projects.

The 2015 CTP identified a number of client services transportation gaps. Upon comparison, many of the issues raised by the public as part of the 2015 CTP still remain, including:

- Affordability of transportation
- Expanded service area boundaries and service hours
- Need for additional help to/from the vehicle
- Reservation requirements
- Need for a centralized information directory

Building upon the positive coordination efforts recognized by stakeholders, specific strategies to enhance coordination and improve transportation services based identified unmet needs were developed.

- Establishing a Local Coordinating Council
- Microtransit expansion
- Subsidized Transportation Network Companies
- Expansion of RTC's Washoe Senior Ride Program
- Expansion of RTC's Smart Trips Program
- Utilization of Volunteer Drivers
- Utilization of Nonprofit Transportation Providers
- Vehicle Sharing
- Creation of One-Call/One-Click Center
- Expansion of RTC ACCESS Service Area

As part of the CTP update, several coordination strategy goals were identified and intended to guide the community toward a more coordinated approach to transportation and mobility throughout the region – an approach that efficiently addresses gaps in services within the capacity of the existing transportation providers and systematically plans for expansion. Those goals and their desired implementation plans are identified below:

GOAL #1 – CREATE A LOCAL COORDINATING COUNCIL (LCC)

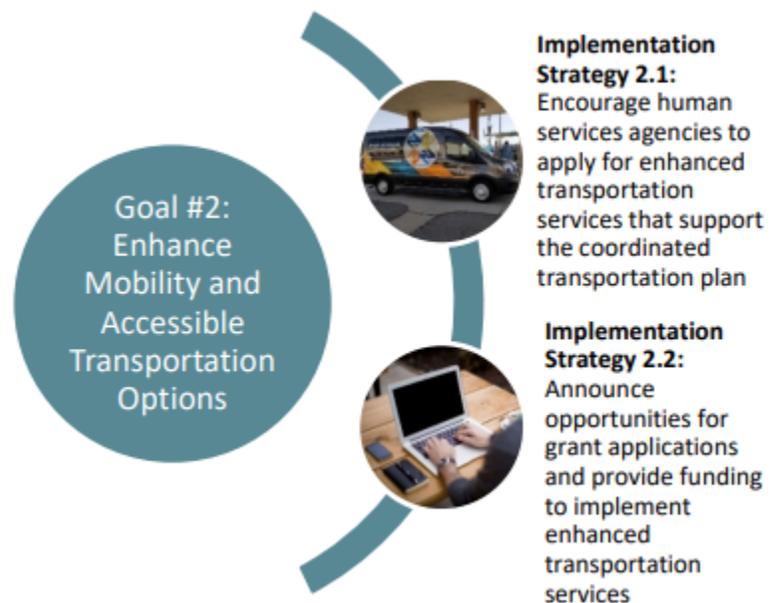
The first priority is to create a Local Coordinating Council (LCC.) The LCC should have representation from RTC, each human services transportation provider, other human services agencies which serve people with transportation needs, local governments, and consumers. The LCC should have two primary functions: (1) facilitate coordination of transportation services, and (2) to recommend program funding activities to the RTC as part of the grant review processes.



The LCC would facilitate coordination of transportation services and recommend program and funding activities to the RTC as part of the grant review processes.

GOAL #2 – ENHANCE MOBILITY AND ACCESSIBLE TRANSPORTATION OPTIONS

Community input and the assessment of transportation needs identified ongoing issues and gaps in transportation service. These include the affordability of transportation for users, areas of Washoe County with limited transportation options, and the need for assistance for many users. Enhanced mobility options may include expansion of microtransit (FlexRIDE) and specialized transportation services. The LCC would assist in identifying specific activities to enhance mobility and determine priorities for funding enhanced services.



RTC will continue to work with local transportation providers and human services agencies to identify opportunities to enhance service and provide funding to implement enhanced service options.

GOAL #3 – ESTABLISH A ONE-CALL/ONE CLICK CENTER

Form a one-call/one click center that would provide a consolidated call reservation, scheduling, and dispatch function. It would provide a central resource for customers' information about matching trip needs with available resources so the customer can identify the best option for their trip. Implementation will require development of a user portal for online access to all of the various transportation services which would be integrated into the one-call center, be made through a web portal or by telephone call to the center.



The center would provide a consolidated call reservation, scheduling, and dispatch function. It would also provide a central resource for customers' information about matching trip needs with available services so the customer can identify the best option for their trip.

RTC will support these coordination efforts by:

- Announcing a call-for-projects through local media, local newspapers, the RTC website and other media, to increase awareness and understanding of the 5310 program;
- Designing and implementing an inclusive selection process;
- Upon establishment, utilizing a Project Selection Committee comprised of members selected by the Local Coordinating Council (LCC);
- Providing technical assistance to applicants and subrecipients; and
- Remaining in regular contact with the FTA and providing timely reports as determined by FTA guidance.

While RTC is directly responsible for developing the CTP, RTC's project review and selection process will include a determination that subrecipient projects are consistent with the plan. At a minimum, the CTP should be updated every four years conducive to and coordinated with our MPO planning process to ensure that selected projects are included in the Regional Transportation Improvement Plan (RTIP) and the State Transportation Improvement Plan (STIP) to ensure funds are obligated and received in a timely manner.

Eligible Subrecipients

Under the federal guidelines, the following entities are eligible to apply for 5310 funding:

Traditional Section 5310 Projects:

- Private non-profit organizations
- State or local governmental authority where no private non-profits are readily available to provide the proposed service

Other Section 5310 Projects:

- Private non-profit organizations
- State or local governmental authority where no private non-profits are readily available to provide the proposed service
- Operator of public transportation
 - Private taxi companies that provide shared-ride taxi service to the general public on a regular basis are eligible subrecipients

To be eligible for funding from the 5310 program, proposed projects must be located or either have an origin or a destination within the Reno/Sparks urbanized area of Washoe County.

Funding Eligibility

Section 5310 funds are available for **capital** and **operating** project expenses to support the provision of transportation services that meet the specific needs of seniors and individuals with disabilities. Additionally, up to 10% of each annual apportionment may be passed on to subrecipients to support program **administrative** costs including administration, planning, and technical assistance funded under this program, as appropriate. Allowable administrative costs may include, but are not limited to, general administrative and overhead costs, staff salaries, office supplies, and development of specifications for vehicles and equipment. This activity may be funded entirely by federal funds and does not require a local match.

Capital

55 percent of funds shall be available for capital projects in excess of \$50,000 that are planned, designed, and carried out to meet the needs of seniors and people with disabilities. 55 percent is a floor, not a ceiling; more than 55 percent of apportionments can be used for these types of projects.

Eligible projects for the required 55 percent of capital projects include the capital cost of contracting for the provision of transit services for seniors and individuals with disabilities and other specialized shared-ride transportation services. The purchase of rolling stock for or the acquisition of ADA complementary paratransit service are eligible capital expenses that may also qualify under the 5310 program as public transportation capital projects planned, designed and carried out to meet the specific needs of seniors and individuals with disabilities when fixed-route public transportation is insufficient, unavailable or inappropriate, provided the projects are carried out by eligible subrecipients. Mobility Management, intended to build coordination among existing public transportation providers and other transportation service providers is considered an eligible capital cost.

Rolling stock must be procured through the RTC Procurement Department utilizing the State of Nevada contract/list of approved vendors. The acquisition of rolling stock also requires subrecipients to develop and maintain a comprehensive ***Maintenance Plan*** to be held on file with the RTC. A Maintenance Plan template is available for subrecipient use and is available on the RTC's website, www.rtcwashoe.com.

Operating

Up to 45 percent of 5310 funds may be used for operating expenses for projects exceeding \$50,000 that provide transportation services that exceed the requirements of the ADA or improve access to fixed route services and decrease reliance by individuals with disabilities on ADA complementary paratransit service.

Additional examples of Capital and Operating expenses are described in the FTA C 9070.1G, Enhanced Mobility of Seniors and Individuals with Disabilities Program Guidance and Application Instructions, and is available on the RTC's website.

Local Funding (Match) Requirements

5310 funds are eligible to support up to 80 percent of the cost of capital projects and up to 50 percent of the net operating costs.

The local share may be provided from an undistributed cash surplus, a replacement or depreciation cash fund, reserve, and a service agreement with a state or local service agency, private social service organization or new capital. Some examples of these sources of local match include:

- State or local appropriations
- Dedicated tax revenues
- Private donations
- Revenue from service contracts
- Net income generated from advertising and concessions

Non-cash share:

- Donations
- Volunteered services
- In-kind contributions are accepted with respect to the following:
 - Eligible to be counted toward local match as long as the value is documented and supported;
 - Represents a capital cost which would otherwise be eligible under the program; and,
 - Included in the net project cost in the project budget.

The source(s) of local funding must be identified in the 5310 grant application.

Funding Distribution, Project Selection Criteria and Annual Program of Projects Development

Application Cycle

MAP-21 requires that projects and programs, implemented with 5310 program funding, to be the outcome of a selection process that is fair and equitable. The FTA provides some flexibility with the process itself. The selection process may be held annually or at intervals up to three years, as determined by RTC and based on local needs. RTC will select projects as needed to avoid the lapsing of any funds that are not obligated in a timely manner.

5310 funds need to be obligated within the next two federal fiscal years following the fiscal year in which the funds were appropriated by Congress. In this regard, the federal fiscal year starts on October 1 and ends on September 30 of the following year. 5310 funds from up to three consecutive fiscal years could be made available and RTC will select projects and programs at intervals not to exceed this time frame. This approach will allow for the development of more viable and longer-term projects, reduce the administrative cost of the programs, and allow for other efficiencies.

Application, Evaluation and Scoring

RTC will provide a grant application in an electronic format on the RTC website when a call for projects is announced, each biennial cycle. If needed, RTC will offer a non-mandatory pre-application workshop for all project proposers to explain program requirements, the application process, and project selection and give proposers an opportunity to ask questions about the application and the process. Throughout the process, RTC staff is available to answer questions should subrecipients require assistance.

RTC is responsible for the selection of projects; and could, but is not required to, include a competitive selection process. If RTC decides to conduct a competitive selection for projects, RTC will conduct the solicitation but retains the option of outsourcing the selection process.

As noted earlier, the Project Selection Committee membership will be selected by the LCC. Only those members of the Project Selection Committee whose agencies are not being evaluated to receive funding will be eligible to serve on this committee. RTC and the LCC will be responsible for establishing the project selection criteria. Evaluation of all projects will take a combined qualitative-quantitative approach. Committee members will score projects and will be empowered to adjust rankings in cases where quantitative measures are insufficient.

RTC staff will serve on the Project Selection Committee in an advisory, non-voting role, to ensure compliance with federal regulations and to assure that projects are derived from the CTP

Projects may be partially or fully funded up to the dollar amount requested on the application, based on the review and evaluation described above and on the available funding in a given project category.

The RTC Board may accept the LCCs Project Selection Committee's recommendations or take other action. In any case, RTC will select projects on a fair and equitable basis.

Equity of Distribution

The process for selecting projects will be widely publicized and disseminated directly to the agencies providing or needing specialized transportation services in the Reno/Sparks urbanized area of Washoe County.

Information relevant to the selection process and application guidelines and forms, are available on RTC's website. As part of the application process, RTC may provide technical assistance to agencies that may not be experienced in the preparation of transportation project proposals, including human service agencies providing or funding client transportation.

Project Approval and Award

Designated recipients (RTC) may utilize up to 10% of each annual apportionment or it may pass any portion of funds available on to subrecipients to support program administrative costs

including administration, planning, and technical assistance funded under this program, as appropriate. Allowable administrative costs may include, but are not limited to, general administrative and overhead costs, staff salaries, office supplies, and development of specifications for vehicles and equipment. This activity may be funded entirely by federal funds and does not require a local match.

Proposals may be selected based on but not limited to project mobility, effectiveness, and benefit to the urbanized area, program reach and population served. Once selection of projects and awarding of funds is finalized, RTC staff will submit a draft Program of Projects (POP) of recommended projects to the RTC Board for approval. RTC posts a Public Notice on its external website offering the public an opportunity to submit comments or request a Public Hearing on its plan for 5310 federal transit funding. Upon approval by the RTC Board, the Board directs RTC staff to incorporate the POP into the RTIP. The POP must be consistent with the RTIP in that all the projects in the POP must also be forwarded to the Nevada Department of Transportation (NDOT) for inclusion in the STIP. The total 5310 Program funding programmed in the RTIP in each year cannot exceed the annual allocation of 5310 Program funds for that year.

Once the POP has been incorporated into those plans, the next step will be to submit the grant into the Federal Transit Administration's (FTA) grant management system.

Timeline

A call for projects is typically announced early in the year, on a biennial cycle. Award notification for the 5310 projects selected will be transmitted to those agencies. Agencies not recommended for funding will be notified of the results of the evaluation process. Subrecipients recommended for funding will be sent an award notification, and a contract between RTC and the subrecipient will be prepared for execution. The contract will indicate the date of the grant approval by the FTA and the effective date for project implementation.

Overall, it may take up to 9 months from the announcement date of the call-for-projects to the execution of the contract. This will depend on funding availability, the number of applications received and the type of selection process.

The contract specifies the effective date of its terms and conditions, including the period of reimbursable activities. In this regard, RTC will reimburse the subrecipient for any eligible expenditure incurred (after deducting the required local match) since the effective date of the contract. Any expenditure incurred by the subrecipient prior to the execution of the contract with RTC is the subrecipient's responsibility.

RTC is not committed to reimburse any expenditure if the contract between the agencies is ultimately not executed, the project is cancelled, the federal funding is not available, or the FTA does not approve the grant application, among other possible scenarios.

Subrecipient Monitoring

RTC will coordinate a subrecipient orientation workshop, if necessary, after the funding award to provide technical assistance on the process that would need to be followed and the federal requirements that have to be met to receive the federal funds. RTC will also communicate regularly with subrecipients to discuss issues or concerns regarding their projects and to provide assistance during implementation to ensure projects are consistent with the funding agreement. Subrecipients will also be required to provide quarterly progress reports and an annual report during the period in which they invoice for eligible activities until grant close-out. In this regard,

subrecipients need to keep track of the performance measures identified for their projects in the contract.

Subrecipients also need to provide supporting documentation when invoicing RTC for expenses incurred. Subrecipients will not be paid in advance of costs incurred. Instead, funds from the 5310 programs will be paid to the subrecipient on a reimbursement basis only. RTC will monitor closely all activities by the subrecipient and take corrective actions to resolve any non-compliance issues, including informing the subrecipients if they are at risk of losing any of the funding that was awarded. The subrecipients must also comply with the auditing requirements specified in the contract.

Private Sector Participation

RTC disseminates information and solicits input consistent with its adopted Public Participation Plan. In addition, RTC is involved with a number of groups comprised of private and public sector agencies on transportation issues.

RTC provides maximum feasible participation by private providers of public transportation, including:

- Maintaining a page on our website (www.rtcwashoe.com) that includes publishing notices of grant opportunities, access to the CTP, this document, applications/templates, federal circulars, and public notice for all Board meetings.

Civil Rights Compliance

As a designated recipient of FTA funds, RTC must comply with and must assure compliance of all eligible subrecipients of all applicable civil rights statutes and implementing regulations including, but not limited to:

- Nondiscrimination in Federal Transit Programs on the basis of race, color, religion, national origin, sex, age, and disability, and in employment or business opportunity
- Nondiscrimination on the basis of disability
 - Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 794)
 - Prohibits discrimination on the basis of disability by recipients of federal financial assistance
 - ADA, as amended (42 U.S.C. 12101 et seq.)
 - Prohibits discrimination against qualified individuals with disabilities in all programs, activities, and services of public entities, as well as imposes specific requirements on public and private providers of public transportation.
 - DOT regulations implementing Section 504 and the ADA include 49 CFR parts 27, 37, 38, and 39.
 - Requires, among other provisions, that vehicles acquired (with limited exceptions) be accessible to and usable by individuals with disabilities, including individuals using wheelchairs.
 - Further responsibilities are required under Titles I, II, III, IV and V of the ADA
 - Covering employment, public services, public accommodations, telecommunications, and other provisions.

Title VI

As a condition of receiving Federal Transit Administration Section 5310 Program funds, subrecipients must comply with the requirements of the US Department of Transportation's Title VI regulations. The purpose of Title VI is to ensure that no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. Subrecipients are also responsible for ensuring compliance of each of their subrecipients (if any), including collecting Title VI Programs, and for ensuring that their third-party contractors are complying with Title VI and the subrecipient's Title VI Program. (See FTA C 4702.1B Chapter II (6) and Appendix L, Scenario Three,) available on RTC's website.

As outlined in FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, ("Title VI Circular"), issued on October 1, 2012, applicants will be required to ensure Title VI Plans are complete and have been implemented.

In order to document that Section 5310 funds are passed through without regard to race, color or national origin, and to document that minority populations are not being denied the benefits of or excluded from participation in the Section 5310 Program, RTC will prepare and maintain the following information, as required by the Title VI Circular, Chapter VI (6):

- a. A record of funding requests received from private non-profit organizations, State or local governmental authorities, and Indian tribes. RTC's records will identify those applicants that would use grant program funds to provide assistance to predominantly minority populations and indicate whether those applicants were accepted or rejected for funding.
- b. A description of how RTC develops its competitive selection process or annual program of projects submitted as part of its grant applications. The description will emphasize the method used to ensure the equitable distribution of funds to subrecipients that serve predominantly minority populations, including Native American tribes, where present.
- c. A description of RTC's criteria for selecting entities to participate in an FTA grant program.

RTC requires that all Section 5310 program subrecipients submit all appropriate FTA certifications and assurances to RTC prior to grant agreement execution and annually thereafter, as requested by RTC. RTC, within its administration, planning, and technical assistance capacity, will also comply with all appropriate certifications and assurances for FTA assistance programs and will submit this information to the FTA as required.

The certifications and assurances pertaining to civil rights include:

1. Nondiscrimination Assurances in Accordance with the Civil Rights Act
2. Documentation Pertaining to Civil Rights Lawsuits and Complaints

Nondiscrimination assurances included above involve the prohibition of discrimination on the basis of race, color, creed, national origin, sex, or age, and prohibit discrimination in employment or business opportunity, as specified by 49 U.S.C. 5332 (otherwise known as Title VI of the Civil Rights Act of 1964), as amended (42 U.S.C. 2000d et seq.) and U.S. DOT regulations, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation-

Effectuation of Title VI of the Civil Rights Act, 49 C.F.R. Part 21. By complying with the Civil Rights Act, no person, on the basis of race, color, national origin, creed, sex, or age, will be excluded from participation in, be denied the benefits of any program for which the subrecipient receives federal funding via RTC. ***Organizations unable to complete these certifications and assurances will not receive funding and should not apply for funding.***

Title VI Programs

All Section 5310 program subrecipients must submit Title VI Programs to RTC. Title VI Programs will be required with the submission of the grant agreement or as requested by RTC, along with the submission of the annual FTA certifications and assurances when FTA publishes the annual list of certifications and assurances. Additional instructions including a Title VI policy template are available to subrecipients on RTC's website. RTC may also conduct onsite visits to ensure compliance.

RTC complies with FTA's Title VI requirements in the following manner:

- i. Provision of an annual Title VI certification and assurance;
- ii. Documented Title VI complaint procedures;
- iii. Record keeping of all Title VI investigations, complaints and lawsuits;
- iv. Provision of meaningful access to persons with Limited English Proficiency;
- v. Notification to beneficiaries of protection under Title VI;
- vi. A requirement that each subrecipient develops a Title VI program to remain on file with the RTC; and
- vii. Submits a Title VI program to the FTA's regional civil rights officer once every three years.

Within each of these broad categories are specific requirements for survey and other data collection, analysis and information distribution that cover transportation programs, construction programs, transit service planning, operations and service/fare changes. Refer to the FTA Title VI Circular and Title VI template available on RTC's website for additional guidance.

Section 504 and ADA Reporting

RTC requires all Section 5310 grant funded projects to meet all applicable Section 504 and ADA rules and regulations. In order to fulfill these requirements, RTC will work closely with its subrecipients to ensure the goals of their federal 5310 grants are being met. In order to track this progress, RTC will review each submitted invoice and insure that all required backup material is attached and correct in order to validate funds spent, work to resolve any potential ineligibility issues with any subrecipient and obtain the return of any funds paid out that have been found to have been ineligible. In addition, RTC will review all quarterly and annual reports to ensure consistency with the terms of the federal grant and the contract. Finally, RTC will make annual site visits to each subrecipient to ensure purchased items, service and/or training funded by the federal grant are in full service, being maintained as per manufacturer's recommendations and are being used to meet the performance measures set forth in the contract and in federal guidelines.

RTC will evaluate all projects receiving grant funds for compliance with all relevant ADA laws, regulations and policies. Moreover, RTC will work with subrecipients to provide technical assistance.

Program/Performance Measures

Annual Program of Projects Status Reports

By October 31 each year, RTC submits a program status report to FTA for each active grant, covering the twelve-month period ending September 30.

By October 15 each year, subrecipients are required to provide the following information to RTC for each Section 5310 funded project activity (capital and/or operating) covering the twelve-month period ending September 30:

Traditional Section 5310 Projects

- Gaps in Service Filled: Report the number of individual seniors and persons with disabilities that used subrecipient's service. This measures transportation services afforded to seniors and individuals with disabilities that would not have been available without Section 5310 program support.
- Ridership: Report actual or estimated number of rides (one-way trips) provided to seniors or individuals with disabilities on Section 5310 supported vehicles and services.

Other Section 5310 Projects

- Service Improvements: Report on 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 Section 5310 program support.
- Physical Improvements: Report on additions or changes to environmental 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 Section 5310 program support.
- Ridership: Report actual or estimated number of rides (one-way trips) provided to seniors or individuals with disabilities on Section 5310 supported vehicles and services.

Subrecipients will be required to report these performance measures on a quarterly basis and on an annual basis and as required by RTC and the FTA.

Section 5310 Program Management

The Section 5310 program management will be completed by multiple facets of the Regional Transportation Commission. The Transportation Department will provide the program management and general review of projects. The Finance Department will approve contracts, provide overall program financial tracking, review invoice packets, track the financial aspect of each project, and complete draw downs. Additionally, the Finance Department will coordinate financial management, accounting systems, audits and management or financial reviews, the close out process, and required reporting.

Procurement

Vehicles must be procured through the RTC Procurement Department utilizing the State of Nevada contract/list of approved vendors. The private non-profit organization or public agency must name the Regional Transportation Commission of Washoe County (RTC) as a co-owner on the vehicle title per Nevada Department of Motor Vehicle rules. The private non-profit organization or public agency remains fully responsible for program compliance including, but not limited to, operation oversight, reporting, insurance, maintenance and monitoring. RTC will maintain titles until grantee request's disposal. A Certificate of Insurance must be provided at time of grant agreement execution. This shall be maintained throughout the useful life of the vehicle and until RTC releases lien of the title. All vehicles purchased must be accessible and comply with ADA requirements.

For other procurements, RTC Procurement staff will provide guidance to assist subrecipients with federally funded procurements and provide technical assistance. This oversight role ensures subrecipient's contracting activity follows RTC's established Disadvantaged Business Enterprise (DBE) program.

Financial Management

RTC is responsible for managing all grants, contracts and interagency contracts to ensure expenditures comply with state and federal rules and regulations. Financial management responsibilities include: ensuring transactions are processed in a timely manner, that accounts are balanced and well documented; investigating and resolving accounting problems to ensure compliance with state and federal rules and regulations; managing the documentation entered into RTC's database relative to individual grants, contracts or interagency agreements; submitting quarterly federal financial reports; and rectifying and closing out FTA grants upon project completion. All systems and procedures for financial management are in compliance with 49 CFR 18.20, the "Common Rule."

Property/Equipment Management

RTC maintains a permanent vehicle record for each vehicle purchased with Section 5310 funds in its Fixed Asset System. RTC ensures that all equipment used by subrecipients purchased with federal funds is used for the program or project for which it was acquired. In the event subrecipients no longer need equipment purchased with federal funds and useful life remains, subrecipient must work with RTC Finance Department staff to transfer the equipment.

Vehicle Use

The grant contract for each vehicle funded by Section 5310 binds the recipient to use it exclusively for the provision of transportation services within the area described in the grant application for the duration of its useful life. If a subrecipient utilizes a section 5310 vehicle for services other than transportation of seniors and individuals with disabilities these services must be documented. All incidental use of 5310 vehicles must be documented and all types of use must be in accordance with the 5310 federal circular 9070.1G.

Maintenance and Disposition

Subrecipients must maintain assets according to the manufacturer's recommended maintenance schedule and the grant contract. For all vehicles, a comprehensive maintenance plan is required after receiving notification of award. This plan should include documented vehicle maintenance/accident repairs and ensure oversight for routine scheduled or non-scheduled maintenance activities. A Maintenance Plan template is available for subrecipient use and is available on the RTC's website. To ensure that vehicles are properly maintained, RTC reviews

vehicle maintenance records/reports, and physically inspects vehicles as part of the on-site visit. Subrecipients may purchase the Federal interest of the equipment's fair market value at any time before the expiration of the equipment's useful life.

Should an accident occur eliminating a vehicle from further operations, RTC will recover the insurance proceeds. If a replacement vehicle is purchased, the insurance proceeds will be forwarded to the subrecipient upon evidence that the replacement has been received, paid for, and legal ownership vested by RTC. Replacement vehicles must be of similar type and of equal or greater value. If the damaged vehicle is not replaced, RTC retains the Federal percentage share of the equipment and remits the local share to the subrecipient. In either instance, the Federal share remitted to RTC, will be retained by RTC and used to provide capital assistance to subrecipients under the 5310 program.

The RTC Finance Department will handle the disposition of all equipment following the disposition procedures established in part 18 of the common rule at 49 CFR 18.32(e).

Accounting Systems

Subrecipients must establish a set of accounts in which all transit related costs, revenues and operating sources are recorded and clearly identified, easily traced and substantially documented. All accounting practices applied and all records maintained must be in accordance with generally accepted accounting principles.

Audit and Closeout

Closeout activities may begin after approved activities are completed, federal funds are expended and reimbursement has been received. RTC submits the following reports to FTA: federal financial report, final budget revision (if any), a final narrative milestone/progress report including a discussion of each activity line item contained in the final budget and list of equipment under the grant; a request to de-obligate any unexpended balance of federal funds; and any other reports required as part of the terms and conditions of the grant.

Project Monitoring and On-Site Reviews

RTC shall continually monitor 5310 grantees through the invoice review process. RTC's Financial Department will review invoices from 5310 grantees to ensure they comply with applicable regulations and are submitted for eligible expenses. If invoices do not match regulations, they will be rejected and will be investigated further. If RTC determines a project is no longer compliant with the 5310 program, funds will be removed from the sub-recipient.

RTC staff conducts annual on-site reviews that monitor subrecipient grant assets and projects to ensure compliance with the grant contract. On-site reviews may be conducted more frequently, as required.

Reporting Requirements

Subrecipients are required to prepare and submit a variety of financial and program progress reports for each grant vehicle and for other projects. These reports will begin based on the date agreements/contracts are signed with subrecipients and will continue until the project is closed out. These will include a project narrative, local matching sources used, number of passenger trips provided, vehicle miles traveled, and revenue service hours provided. RTC tabulates and retains the reported information electronically.

Other Provisions

Compliance with Federal Requirements

Applicants should be prepared to abide by all applicable federal requirements as specified in 49 U.S.C. Section 5310, FTA Circulars C 9070.1G and 4702.1B found under (http://www.fta.dot.gov/legislation_law/12349.html), the most current FTA Master Agreement (<http://www.fta.dot.gov/grants/15072.html>), and the most current Certifications and Assurances for FTA Assistance Programs (<http://www.fta.dot.gov/grants/13071.html>). These links are also accessible from RTC's website.

RTC includes language regarding these federal requirements in its grant agreements with subrecipients and requires each subrecipient to execute a certification of compliance with the relevant federal requirements. Subrecipient certifications are required of the subrecipient prior to the execution of a grant agreement with RTC and annually thereafter when FTA publishes the annual list of certifications and assurances. *As previously mentioned, organizations unable to complete these certifications and assurances will not receive funding and should not apply for funding.*

Furthermore, subrecipients of Section 5310 funds are monitored by RTC staff for compliance in all of the mentioned areas, where applicable.

Environmental Protection

RTC anticipates only funding projects with categorical exclusions from both the National Environmental Protection Act (NEPA.) Therefore, there should be no further documentation necessary. However, should a project be approved that is subject to environmental regulations, RTC will ensure that the subrecipient meets all environmental requirements, and submits all necessary documentation.

Buy America Provisions

RTC undertakes the procurement of vehicles under the Section 5310 grant program, therefore, compliance with Buy America is the responsibility of the State. Buy America Certification is required of all bidders.

Pre-Award and Post Delivery Review

While it is not anticipated, procurements for vehicles, other than sedans or unmodified vans, must be audited in accordance with 49 CFR part 663, "Pre-Award and Post-Delivery Audits of Rolling Stock Purchases." RTC Procurement staff are available to provide guidance and assistance should these reviews be required and/or necessary.

Restriction on Lobbying

As part of RTC's Section 5310 grant process, RTC annually assures the FTA that no Section 5310 funds will be used for influencing or attempting to influence an officer or employee of Congress, or an employee of a Member of Congress in the awarding of any federal contract, the making of any federal grant, the making of any federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment or modification of any federal contract, grant, loan or cooperative agreement.

Prohibition on Exclusive School Transportation

Title 49 U.S.C. 5323(f) prohibits the use of FTA funds for exclusive school bus transportation for school students and school personnel. The implementing regulation (49 CFR part 605) does permit regular service to be modified to accommodate school students along with the general public ("tripper service"). For the purpose of FTA's school bus regulation, Head Start is considered a social service, not a school program. Rules for the Head Start program limit the types of vehicles that may be used to transport children participating in a Head Start program.

Drug and Alcohol Testing Regulations

In accordance with FTA circular C 9070.1G, subrecipients that receive only Section 5310 program assistance are not subject to FTA's drug and alcohol testing rules, but must comply with the Federal Motor Carrier Safety Administration (FMCSA) rule for all employees who hold commercial driver's licenses (49 CFR part 382). Section 5310 recipients and subrecipients that also receive funding under one of the covered FTA programs (Section 5307, 5309, or 5311) should include any employees funded under Section 5310 projects in their testing program.

Program Management Plan Updates

As stated earlier, the PMP is a living document. It will be updated regularly to incorporate any expansions and enhancements of the 5310 program, as well as any revisions to the program's management, requirements or guidelines. It will also be updated per the request of the FTA or based on significant input submitted from subrecipients, eligible applicants and the general public. All significant changes to the PMP will require FTA approval. At minimum, the PMP will be updated every three to four years.