SECTION 5311
COMPLIANCE AND PERFORMANCE REVIEW
PACKAGE

Subrecipient Name
Subrecipient Street Address
City, State, Zip

Site Visit Date:

2019

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OVERVIEW

The Missouri Department of Transportation (MoDOT) is required by the Federal Transit Administration (FTA) to ensure that subrecipients of FTA assistance comply with federal requirements. To meet this federal mandate, MoDOT conducts periodic reviews of its subrecipients. Additional objectives of the reviews are to ensure compliance with State requirements, identify and promote good practices, identify training and technical assistance needs and spend one-on-one time with subrecipients.

This review package lists materials to be reviewed and contains questions to be answered. The questions address FTA and State requirements and good practices related to the funding you receive and the services you provide. This package will document the review from start to finish.

The review process is as follows:

1. **Desk review**: MoDOT reviews information in its files. The desk review is completed.

2. **Subrecipient pre-site visit preparation**: The subrecipient receives the review package, gathers the requested documents, answers the questions by typing the responses into the review package, and sends the requested documents and completed review package to the reviewer. *Please keep the review package in its MS Word format when answering the questions.*

3. **MoDOT/consultant pre-site visit preparation**: MoDOT and the consultant review your answers to the questions and the supporting documents submitted and note follow-up items in the package. Before the site visit, MoDOT or its consultant emails you the annotated review package for you to follow during the site visit. *Items to be discussed at the site visit will be highlighted.*

4. **Site visit**: MoDOT visits you to discuss the answers to the questions, tour your facility(ies), inspect vehicles, and review financial, procurement and maintenance files. The site visit begins with an entrance conference. The site visit ends with an analysis of strengths, weaknesses, opportunities and threats (SWOT analysis) and an exit conference at which preliminary findings are discussed.

5. **Report**: MoDOT issues a report, noting any deficiencies with associated corrective actions and timelines for implementation. The report may also contain "best practices" recommended by MoDOT and the consultant that may benefit your transportation program.

6. **Follow-up and close-out**: MoDOT and the consultant work with you to address any deficiencies identified during the review.

MoDOT has contracted with Milligan & Company, LLC to conduct the reviews and site visits.

Your agency's site visit is scheduled for [Day, Date/Time]. Please send the requested documents and completed review package by [Day/Date] to [reviewer]. His/her contact information appears below. An electronic copy of the completed review package in MS Word format is required as the reviewers will add notes to the document. When sending documents in portable document format (pdf), please ensure that the document is in native pdf, that is, is searchable. Electronic copies of additional documents are preferred. Please email the requested documents to your reviewer. Copy Mr. Bryan Heckman, MoDOT 5311 Program Manager, at Bryan.Heckman@modot.mo.gov on all emails.

Name:
Milligan & Company, LLC
Email:
Phone:

Thank you for taking the time to participate in this review. We look forward to continuing our successful and productive relationship.

Sincerely,

Joan Roeseler

Joan Roeseler
Administrator of Transit

SITE VISIT SCHEDULE

The table below presents the tentative site visit schedule. The review package sent to you before the site visit will contain the final schedule. If time permits, we may ride your service.

Day, Date	
9:00 – 12:00	Entrance Conference Background Operations and Service Provision
12:00 – 1:00	Lunch
1:00 – 4:30	Administration and Management Planning and Marketing SWOT Analysis/Exit Conference

Schedule for 5311s not using the MoDOT Drug & Alcohol Program TPA

Day 1, Date	
9:00 – 12:00	Entrance Conference Background Operations and Service Provision
12:00 – 1:00	Lunch
1:00 – 4:30	Administration and Management Visit to collection site(s)
Day 2, Date	
9:00 – 11:00	Planning and Marketing SWOT Analysis/Exit Conference

REQUESTED DOCUMENTS

Unless noted, please send requested documents to the reviewer before the site visit. Copies should be provided in electronic format.

Documents	Comment
Legal and Governance	
Organization chart that shows the reporting relationship to the Board	
Articles of incorporation (if a non-profit organization)	
Bylaws (if a non-profit organization)	
Sample adopted board minutes	
Sample board financial report	
Board policy manual	
Narrative/milestone history, if maintained	
Control Environment	
Conflict of interest policy/code of conduct	
Project Management/Grant Administration	
Business continuity/disaster recovery plan	
Document control and retention procedures	
Financial Management	
Accounting/grant management policies and procedures	
Most recently completed audit (If unavailable in electronic format, please have a hard copy available for the site visit.)	
Chart of accounts	
Cost allocation plan (required if indirect costs are charged to FTA grants)	
Back-up documentation for reimbursement requests over the previous year	Have available for review at the site visit.
Fare collection procedures	
Credit card policy	
Procurement	
Procurement policy manual (required)	
Code of conduct governing procurements (required of private nonprofit agencies)	
Procurement files for items purchased using FTA funds	Have available for review at the site visit.

Documents	Comment
Charter Bus	
Charter files, if any charter service has been provided	Please have available for review for the site visit
Personnel	
Personnel manual	Have available for review at the site visit.
Job descriptions	
Policy governing computer and Internet use	
EEO	
EEO policy statement	
Employment application form	
Sample job posting and advertisement	
Asset Management	
Certificate of Insurance	
Written vehicle maintenance plan (recommended by MoDOT)	
Vehicle pre-trip inspection form (if not included in the written vehicle maintenance plan)	
Written facility/equipment maintenance plan (required for FTA-funded facilities)	
Facility condition assessment	Required of Sec. 5311 Subrecipients
Vehicle and facility maintenance records	Have available for review at the site visit.
Service Provision	
Service policy/operator manual	
Driver training materials	
Rider's guide	
Passenger behavior policy	
No-show policy	
Suspension appeals policy	
Complaint resolution procedures	
Safety and Security	
System safety, security plans	Have available for review at the site visit.
Emergency preparedness plan	Have available for review at the site visit.

Documents	Comment
Accident investigation forms	
Drug and Alcohol Program	
Contract with consortium/third-party administrator	Only if WPCI is not your third-party administrator
Certificates/qualifications of collection personnel (MRO, SAP, BATs, STTs, urine collectors)	Only if WPCI is not your third-party administrator
Drug and alcohol policy (required)	
Applicant prior employer release form	
Prior employer information request form	
MIS reports for the past three years	
Post-accident form, if used	
Testing records	Have available for review at the site visit.
Training records	Have available for review at the site visit.
Marketing	
Sample marketing materials (schedules, brochures, newspaper ads, etc.)	Have available for review at the site visit.
Planning and Coordination	
Transit planning studies	

BACKGROUND

REVIEW INFORMATION

Provider contact: Address: Phone: Fax: Email: Website:
Site Visit Dates: <mark>Day, Date & Time</mark>

INSTITUTIONAL STRUCTURE

Name:
Type of Organization *(County, city, non-profit, etc.)*:
Year established: Year service started:
List of Contractors *(if applicable)*:   -   Management Contractor: -   Fixed Route Operating Contractor(s):   -   Paratransit Operating Contractor(s):   -   Maintenance Contractor(s):

SERVICE DESCRIPTION

(Whether directly operated or contracted)

Areas/communities serviced:
Population:
Square miles:
Number of routes (if applicable) or types of service operated:
Days and hours of operation:
Fare information:
Number of revenue service vehicles in fleet:
Number of transit-related employees (full-time/part-time):
Ridership for most recent year:
Coordination/transfers with:
Transit operating budget for current year:

ASSETS

Assets:	Number	Name/Location	Federal and/or State Interest (yes or no)
Administrative/Maintenance Facility			
Administrative Facilities			
Maintenance Facility			
Revenue Vehicles			
Transfer/Intermodal Center			
Storage Facility			
Passenger Shelters			

PROJECT ACTIVITY

Provide a brief description of noteworthy projects that were recently completed and are on-going or planned.

REVIEW AREAS

SERVICE PROVISION

Subrecipients shall have effective procedures for ensuring that quality service is delivered to the public. A comprehensive training program is a key component of a quality assurance program. Subrecipients should collect and use financial and operating data to monitor the effectiveness and efficiency of operations. Key financial and operating data should be reported to the Board.

1. Who (job title) is responsible for the day-to-day supervision of transit operations?	
2. Have annual reports been submitted to MoDOT on time?	
3. What kind of driver training is provided?	
4. What kind of training is provided for schedulers/ dispatchers?	
5. Are records maintained of who attended the training including names, sign-in sheet, and the content of the training? *(The reviewer will examine training files.)*	
6. Are all drivers provided a "hands-on" orientation of every agency vehicle type they may be asked to operate and is this orientation formally documented?	
7. Is there a written service policy or operators' manual? When was it last updated? Does the policy/manual accurately and completely document current policies governing the delivery of service?	
8. When was the last time routes and schedules were revised for fixed route or route deviation services? Do routes and schedules need to be evaluated?	
9. Is schedule-making coordinated with public information, dispatching and operations supervision?	

10. For demand response service, what are the procedures for scheduling and dispatching trips? Are denials tracked and periodically reviewed by management?	
11. If service is scheduled in advance, have you made arrangements to have an answering machine take calls after business hours to schedule or cancel a ride?	
12. Describe the fare structure.	
13. Are fares reviewed annually?	
14. When was the last fare increase? How was the public involved in the decision-making process?	
15. How are passenger counts obtained? For route-deviation services, are boardings by stop tracked?	
16. Besides passenger counts, what other operational data are collected?	
17. Do the data reported to MoDOT for National Transit Database (NTD) cover all operations, including those not supported with Section 5311 assistance? *Required of recipients of Section 5311 assistance only.*	
18. Is there a printed or on-line rider's guide?	
19. Is there a Board-approved policy governing standards of behavior by passengers on buses and transit property? Does the policy address personal hygiene?	
20. How do you handle violations of the passenger behavior policy?	
21. If riders may be suspended for unruly behavior, who (job title) makes the decision?	
22. Is there a no-show policy? If yes, has it been approved by the Board?	
23. If riders may be suspended for unruly behavior or no-shows, what is the appeals process for suspensions?	

24. Are there written complaint/comment resolution procedures?	
25. Who (job title) receives complaints and how are they processed? How long are complaint records kept on file?	

ASSET MANAGEMENT

Subrecipients must use FTA-funded equipment and facilities to provide public transportation. Subrecipients must carry comprehensive and collision insurance on FTA-funded buses. Subrecipients must obtain prior written approval from MoDOT before selling, leasing, or disposing of vehicles, equipment or facilities that have remaining FTA interest. The number of spare vehicles must be appropriate to the size and age of the fleet, the amount of peak demand, and the projected ridership growth. Subrecipients must have written plans for FTA-funded equipment and facilities and must maintain FTA-funded equipment and facilities at a high level of cleanliness, safety, and mechanical soundness In accordance with the manufacturers' minimum requirements.

SATISFACTORY CONTINUING CONTROL	
1. Is property (vehicles, facilities, materials, equipment, etc.) that was acquired with FTA funds used for its originally authorized purpose? Is there incidental use of any FTA-funded vehicles or facilities?	
2. Can all equipment and facilities purchased with FTA funds be accounted for?	
3. What system is in place to insure against loss, damage or theft?	
4. What are the vehicle insurance coverage limits for: Comprehensive and collision? Commercial/comprehensive general liability insurance?	
5. Regarding your revenue service fleet: a. What is the number of revenue vehicles?	
b. What is the number of vehicles required for maximum service?	
c. What is the number of spare vehicles (a minus b)?	
d. What is the spare ratio (c divided by b)?	
6. How often is the maximum number of vehicles required?	
7. How many vehicles were in use at the time of the site visit? *(Reviewer will answer.)*	

8. How many vehicles were parked or in the garage at the time of the site visit? *(Reviewer will answer.)* How many are operational? *(Reviewer will answer.)*	
9. Do future ridership projections indicate a need for expansion vehicles?	
10. Does the spare ratio appear reasonable given the size and age of the fleet, the frequency of peak service demand, and the projected ridership growth? *(Reviewer will answer.)*	
11. Are the vehicles used appropriate for the type of service, ridership volumes, and scheduling patterns?	
12. Are FTA-funded vehicles leased to or operated by other providers? If yes, does the lease or operating agreement include maintenance standards? Did MoDOT approve the lease in writing?	
VEHICLE MAINTENANCE	
13. Who (job title) is responsible for vehicle maintenance?	
14. Is the maintenance plan written? *Recommended by MoDOT.*	
15. List all vehicles purchased with FTA funds (year, make, and model). The list may be provided as a separate document.	
16. What are the preventive maintenance schedules for each type of vehicle in the fleet?	
17. Do preventive maintenance schedules for each type of vehicle in the fleet meet the manufacturer's minimum requirements? *MoDOT requires grantees to, at a minimum, follow manufacturers' minimum requirements for preventive maintenance.*	
18. Is a preventive maintenance program in place for lifts and other accessibility features such as ramps, public announcement systems, tie-downs, etc.? *49 CFR 37.161 requires accessibility features and equipment be maintained in operating condition.*	

19. Is a preventive maintenance program in place for on-board systems, such as cameras, video recorders or passenger counters?	
20. What procedures are used to track when preventive maintenance inspections are due and to schedule preventive maintenance inspections?	
Does the review of vehicle maintenance records indicate that preventive maintenance (PM) service is performed in accordance with the vehicle manufacturer's recommendation(s)? *(Reviewer will answer after examining maintenance records. At least 80 percent of PM inspections must be performed on time. MoDOT allows a +10 percent or +500-mile variance, whichever is greater, when determining whether an inspection was performed on time.)*	
21. Does the review of the maintenance records indicate that the files are complete and document the maintenance conducted? *(Reviewer will answer.)*	
22. Are pre-trip inspections conducted prior to placing a vehicle in service? Is a checklist used for the pre-trip inspection? If so, provide a copy of the checklist.	
23. Does the pre-trip inspection address safety; vehicle operation, appearance, and cleanliness; and passenger comfort?	
24. Does the pre-trip inspection ensure that safety items, such as seat belt cutters, boxes with bi-directional reflective triangles and fire extinguishers are on or secured to the vehicle?	
25. Does the pre-trip inspection program address lifts and other accessibility features, such as ramps, public announcement systems, and tie-downs? *49 CFR 37.163 requires public entities to establish a system of regular and frequent checks of accessibility features sufficient to determine if they are operative.*	
26. As part of the pre-trip inspection, do drivers verify that tie-downs and straps are on board and clean? Where are tie-downs and straps stored on the vehicles?	
27. How does the agency document maintenance activity performed to correct the reported defect?	

28. When a lift is found to be inoperative, is the vehicle taken out of service by the beginning of the next service day and repaired before being returned to service? What alternative arrangements are made for riders? *49 CFR 37.165 requires vehicles with inoperative lifts to be removed from service before the next day unless no spare is available and taking the vehicle out of service would reduce the level of service.*	
29. Are emergency exits and pop-up roof hatches tested periodically to ensure that they are in working order? If yes, how often and how is it documented?	
30. Are deficiencies noted in pre-trip inspections repaired timely and properly reviewed by management? Who reviews the inspections? How often?	
31. Do the vehicles meet an acceptable level of cleanliness (exterior and interior)?	
32. Are any Section 5311-funded vehicles currently under warranty? Please list.	
33. What is the system for tracking warranty issues and recovering warranty claims? *FTA Circular 5010.1E requires that recipients have a system for tracking warranty issues and recovering warranty claims.*	
34. Are warranty claims pursued effectively and promptly to conclusion?	
35. Have there been any safety recall notices in the past two years? If yes, please describe the issue and its resolution.	
PROPERTY MANAGEMENT AND FACILITY MAINTENANCE	
36. Who (job title) is the accountable executive, responsible for the Transit Asset Management (TAM) plan? *NOTE: The TAM Plan applies to all assets, including vehicles.*	
37. Provide the physical address and year constructed for each FTA-funded facility.	

38. Is there incidental use of any FTA-funded real property (facility, land)? If yes, answer items a-d.	
a. What is the incidental use?	
b. Was MoDOT approval of the incidental use obtained?	
c. Does the agency maintain continuing control over the property?	
d. Is revenue from the incidental use used for transit planning, capital, or operating expenses?	
39. Was real property removed from the service originally intended at grant approval or put to additional or substitute uses?	
40. Did you dispose of any FTA-funded real property since the last site visit? If yes:	
a. Was prior concurrence obtained from MoDOT regarding the method of disposition of the property?	
b. Was FTA/MoDOT reimbursed for its share of disposition proceeds, if required?	
41. Are any FTA-funded structures located in an area that has been identified as having special flood hazards (100-year flood zone)? If so, are the structures covered by flood insurance? *Section 102 of the Flood Disaster Protection Act of 1973 (FDPA) prohibits the federal government from funding acquisition or construction of buildings located in a flood hazard area unless the property owner first has obtained flood insurance.*	
42. Is there a written facility maintenance plan and inspection checklist? *FTA Circular 4220.1D Chapter IV, Section 3.m requires written maintenance plans for facilities and facility-related equipment.*	
43. Are the facilities inspected at least once a year to determine what repairs and/or maintenance are needed to the equipment or building? What was the date of the last inspection?	

44. Does the written plan or inspection checklist address equipment such as hydraulic lifts, bus washers, overhead doors, roofing systems, HVAC systems, and security systems?	
45. Does the written plan or inspection checklist address maintenance of ADA accessibility features, such as power-assist doors, as required by ADA? *49 CFR 37.161 requires maintenance of accessibility features.*	
46. Do preventive maintenance checklists follow the minimum requirements determined by the manufacturer, supplier or builder?	
47. For preventive maintenance performed by contractors, are the contractors required to complete checklists documenting the checks performed?	
48. Are files maintained on maintenance of facilities and related equipment?	
49. Do the files indicate that preventive maintenance inspections of facilities and related equipment are conducted at the intervals required by the plan? [Reviewer will sample maintenance records.]	
50. Are any features of facilities or related equipment under warranty? If yes, please list. Are warranty claims pursued?	
51. Are the facilities clean and well maintained? Are there any visible defects? Does the facility need to be painted? If yes, when is this scheduled?	
52. Does the facility condition assessment accurately reflect the condition of the facilities? *(Reviewer will answer)*	

AMERICANS WITH DISABILITIES ACT

Titles II and III of the Americans with Disabilities Act of 1990 (ADA) provide that no entity shall discriminate against an individual with a disability in connection with the provision of transportation service. The law sets forth specific requirements for vehicle and facility accessibility and the provision of service.

1. Is the provided service fixed route, route deviation, and/or demand responsive?	
2. Have any complaints of discrimination due to disability been received from riders? If yes, describe the complaints. How is the public informed on how to file an ADA complaint? How are ADA complaints responded to? Were the complaints reported to MoDOT? How long are complaints kept on file? *49 CFR 27.13 and 37.17 require procedures for addressing ADA complaints that incorporate appropriate due process standards and provide for prompt and equitable resolution. Subrecipients must sufficiently advertise the process for filing an ADA-related complaint and communicate a response promptly to any individual filing a complaint. The subrecipient is not required to respond to all complaints in writing, but rather must ensure the response can be documented internally. Subrecipients must retain copies of ADA-related complaints for at least one year and a summary of all ADA-related complaints for at least five years.* *MoDOT requires that it be notified of complaints.*	
3. Are facilities accessible?	
4. When planning new or rehabilitated facilities, what steps are taken to ensure that the facilities comply with ADA?	

5. If there are non-accessible FTA-funded vehicles in the demand-responsive fleet:
 	
   a. How does the agency ensure that equivalent service is provided?
 	
   b. Has service been denied due to the unavailability of accessible vehicles?
 	
49 CFR 37.105 requires that service to individuals with disabilities be equivalent to the service provided other individuals with respect to response time, fares, geographic service area, hours and days of service, and capacity.	

6. Are system brochures, application forms, rider handbooks, and occasional bulletins available in alternative formats upon request? If yes, what formats? *49 CFR 37.167 requires public information to be made available in alternative formats upon request. Examples of alternative formats include large type, audio-tapes, Braille, and information posted on the Internet.*	
7. What is the process to request a reasonable modification? How is the public informed on how to make requests for reasonable modifications? *49 CFR 37.169 requires a process for requesting reasonable modification to policies and practices to accommodate a person with a disability. Information on the reasonable modification process must be readily available to the public, and must be accessible. Advance notice can be required, but flexibility is also needed to handle requests that are only practicable on the spot. Individuals requesting modifications are not required to use the term "reasonable modification.*	
8. Are all mobility devices required to be secured? *49 CFR 37.165 allows providers to require all mobility devices to be secured.*	
9. What is the policy for providing service if a mobility device cannot be secured? *49 CFR 37.165 requires that service must be provided even when a mobility device cannot be secured.*	

10. Are persons using a mobility device required to transfer to a seat? *49 CFR 37.165 stipulates that operators may request, but not require that mobility device users transfer to a seat.*	
11. Are persons using a mobility device required to wear a seat belt? *49 CFR 27.7 ADA equivalent facilitation provisions: unless ALL passengers are required to wear a seatbelt, you may request but not require that mobility device users use a seatbelt.*	
12. Are size or weight limitations placed on mobility devices? *49 CFR 37.165 prohibits entities from setting weight or size limitations on mobility devices it will transport that understate the capacity that the vehicle fleet can accommodate.*	
13. Do drivers provide assistance to passengers as necessary and upon request with lifts, ramps, and securement devices? *49 CFR 37.165 requires drivers and other personnel to provide assistance as necessary and upon request.*	
14. Are individuals that do not use a mobility device permitted to use the lift for boarding or alighting? *49 CFR 37.165 requires operators to deploy lifts for standees upon request.*	
15. Are lifts/ramps deployed at any stop? *49 CFR 37.165 requires that operators permit a passenger who uses a lift or ramp to board or disembark from a vehicle at any designated stop, unless the lift or ramp cannot be deployed, the lift will be damaged if it is deployed or temporary conditions preclude the safe use of the stop by all passengers (i.e., the stop is "closed" for the duration of such conditions).*	
16. How and when do operators report lift and ramp failures? *Operators must report immediately any in-service lift and ramp failures.*	

17. Regarding service animals:	
a. Are service animals allowed on the buses? *49 CFR 37.167 requires that operators permit service animals to travel with riders.*	
b. Are service animals required to be certified? *Service animals are not required to be certified.*	
c. Are service animals required to be under the control of the passenger? *USDOT ADA regulations allow providers to require that service animals be under the control of the passenger.*	
18. Is service provided to persons using respirators or portable oxygen? *49 CFR 37.167 requires operators to provide service to persons using respirators or portable oxygen.*	
19. What is the policy regarding the time allowed to passengers for boarding and alighting? *49 CFR 37.167 requires that operators allow adequate time for passengers with disabilities to board and alight vehicles.*	
20. Are drivers required to make use of all available accessibility equipment? *49 CFR 37.167 requires that operators make use of all available accessibility equipment when needed.*	
21. How are policies governing providing service to passengers covered under the ADA conveyed to drivers?	
22. Are drivers trained in the use of accessibility equipment? In properly assisting passengers with disabilities who use the service with respect, courtesy and sensitivity? How soon after being hired does the training occur? *49 CFR 37.173 requires that drivers be trained to proficiency as appropriate for their duties so that they operate vehicles and equipment safely and properly assist and treat individuals with disabilities who use the service with respect, courtesy, and sensitivity.*	

23. How are drivers monitored to ensure that they comply with ADA requirements? Examples: Follow-up on complaints, ghost riders, road supervision, ADA advisory committee.	
24. Is route-deviation service provided? If yes, do public materials and bus schedules clearly state the procedures for requesting deviations and that the service is available to the general public? *FTA requires that route-deviation service be open and promoted to the general public.*	
25. Are mobility device securement locations and at least two forward-facing seats in the front of each bus designated as priority seating? *49 CFR 38.27 Priority seating signs requires that each vehicle contain sign(s) which indicate that seats in the front of the vehicle are priority seats for persons with disabilities, and that other passengers should make such seats available to those who wish to use them. At least one set of forward-facing seats shall be so designated. Each securement location shall have a sign designating it as such.*	
26. Are persons sitting in priority seats requested to vacate those seats when a person with a disability needs to use them? *When an individual with a disability needs to sit in a seat or occupy a mobility device securement location, 49 CFR 37.167(j) requires the operator to ask the passenger to move in order to allow the individual with a disability to occupy the seat or securement location.*	
27. Do drivers announce stops on fixed routes? *49 CFR 37.167 requires drivers to announce stops at transfer points with other fixed routes, major intersections and destination points, upon request, and at sufficient intervals to permit individuals with visual impairments or other disabilities to be oriented to their location.*	
28. When multiple routes serve the same stop, what means are in place to alert individuals with disabilities to the route number and destination? *49 CFR 37.167 requires that operators have such a means.*	

| 29. Is alternative service provided to persons stranded for more than 30 minutes due to lift/ramp failures?

If a lift or ramp failure occurs on a route where the headway is greater than 30 minutes and the passenger cannot be served, the operator is required to provide alternative service within 30 minutes. | |

CHARTER BUS

Subrecipients are prohibited from using FTA-equipment and facilities to provide charter service except in accordance with allowable exemptions or exceptions.

1. Is transportation provided for other organizations for "program purposes" (serving the needs of human service agencies or elderly persons, persons with disabilities, or low-income persons)? If yes, describe. *For Section 5310 and 5311 subrecipients, transportation for "program purposes", that is, that serves the needs of either human service agencies or elderly persons, persons with disabilities, or low-income persons, is exempted from the regulation.*	
2. Is charter service operated? If **yes**, describe the charter service provided and answer the balance of the questions in this section. If **no**, go on to the School Bus section. If you are **not sure**, describe the service in question and the reviewer will determine whether the service was charter service and go through the balance of the questions with you during the site visit. *Charter service is defined as:* *Transportation provided at the request of a third party for the exclusive use of a bus or van for a negotiated price; or* *Transportation provided to the public for events or functions that occur on an irregular basis or for a limited duration and:* ▪ *A premium fare is charged that is greater than the usual or customary fixed route fare; or* ▪ *The service is paid for in whole or in part by a third party.*	
3. Is charter service provided with locally owned vehicles? If yes, are the vehicles maintained or stored in an FTA-funded facility? *Charter service using locally-owned vehicles that are maintained or stored in an FTA-funded facility must comply with the charter regulations. If maintained or stored in a non-FTA-funded facility, the service must be completely segregated from FTA-funded service.*	

4. Under what exception is the charter service operated? (**Please refer to the Charter Bus Exceptions and Procedures chart**.) Did you follow the procedures required by the exception? Have documentation that you have complied with the procedures ready for the site visit.	
5. Have all charters been reported to MoDOT? *Required by FTA for service provided under the GO, QH, LE and WN exceptions. Refer to the Charter Bus Exceptions and Requirements table.*	
6. Are charter records kept for at least three years? Are these procedures documented? *Charter records must be maintained for at least 3 years.*	
7. Have any complaints been filed alleging that the charters are in violation of the FTA regulations?	

CHARTER BUS EXCEPTIONS AND REQUIREMENTS

Exception	Procedure
Exception 604.6 – Government officials on official government business (**GO**) (1) Is restricted to its geographic service area (2) Must not generate revenue, except as required by law (3) Is limited to 80 hours annually. May petition for additional charter hours	Record the following information: 1. Government organization's name, address, phone number, and email address 2. Date and time of service 3. Number of government officials and other passengers 4. Origin, destination, and trip length (miles and hours) 5. The fee collected, if any 6. Vehicle number (example, bus 102) Retain the record for three years.
Exception 604.7 – Qualified human service organizations (**QH**) Service to persons: (1) With mobility limitations related to advanced age, (2) With disabilities, or (3) With low income. Organization must register if it does not receive funds from programs listed in Appendix A of the charter regulation.	Ensure that the human service agency is qualified, that is, it receives funds from programs listed in Appendix A of the charter regulation or has registered on the FTA charter website at least 60 days before the charter request. Record the following information: 1. QHSO's name, address, phone number, and email address 2. Date and time of service 3. Number of passengers 4. Origin, destination, and trip length (miles and hours) 5. The fee collected, if any 6. Vehicle number (example, bus 102) Retain the record for three years.
Exception 604.8 – Leasing FTA funded equipment and drivers to a charter service operator (**LE**) only if the following conditions exist: 1. The operator is registered on the FTA charter registration web site 2. The operator owns and operates buses or vans in a charter service business 3. The operator received a request for charter service that exceeds its capacity either of the number of vehicles operated or the number of accessible vehicles 4. The operator has exhausted all of the available vehicles for all registered charter providers in your geographic service area	Record the following information: 1. Registered charter provider's name, address, telephone number, and email address 2. Number of vehicles leased, types of vehicles leased, and vehicle identification numbers 3. Documentation presented by the registered charter provider that the four conditions are satisfied. Retain the record for three years.

Exception	Procedure
Exception 604.9 – When no registered charter provider responds to a notice posted on the FTA charter website (**WN**): 1. Within 72 hours for charter service requested to be provided in less than 30 days, or 2. Within 14 calendar days for charter service requested to be provided in 30 days or more.	Include the in the e-mail notice sent to the list of registered charter providers: 1. Customer name, address, phone number, and e-mail address (if available); 2. Requested date of service; 3. Approximate number of passengers 4. Type of equipment requested, bus(es) or van(s); 5. Trip itinerary and approximate duration; and 6. The intended fare to be charged for the service. If an "undeliverable" notice is received in response to its e-mail notice, fax the notice. If service is provided, record the following information: 1. The group's name, address, phone number, and email address 2. Date and time of service 3. Number of passengers 4. Origin, destination, and trip length (miles and hours) 5. Fee collected, if any 6. Vehicle number (example, bus 102) Retain all records (email sent, undeliverable notice, facsimile, record of charter) for three years.
Exception 604.10 – Agreement with registered charter providers If a new charter provider registers in the geographic service area, may continue to provider charter service for 90 days without an agreement with the newly registered charter provider. Any parties to an agreement may cancel at any time after providing a 90-day notice.	Record the following information: 1. The group's name, address, phone number, and email address 2. Date and time of service 3. Number of passengers 4. Origin, destination, and trip length (miles and hours) 5. Fee collected, if any 6. Vehicle number (example, bus 102) Retain the record for three years.

Exception	Procedure
Exception 604.11 – Petitions to the Administrator for: 1. Events of regional or national significance 2. Hardship (<200,000 population only) 3. Unique and time sensitive events that are in the public interest	For an event of regional or national significance, the petition shall describe how registered charter providers were consulted and will be utilized, include a certification that the recipient has exhausted all the registered charter providers in its service area, and submit the petition at least 90 days before the first day of the event. For a hardship request, the exception must be for deadhead time that exceeds total trip time from initial pick-up to final drop-off, including wait time and shall describe how the minimum duration would create a hardship on the group requesting the charter. For a unique and time sensitive event, the petition shall describe why the event is unique and time sensitive and would be in the public's interest. Record the following information: 1. The group's name, address, phone number, and email address 2. Date and time of service 3. Number of passengers 4. Origin, destination, and trip length (miles and hours) 5. Fee collected, if any 6. Vehicle number (example, bus 102) Retain the record for three years.
Note: Charter service hours include: time spent transporting passengers, time spent waiting for passengers and "deadhead" hours.	

SCHOOL BUS

Under 49 CFR Part 605, subrecipients are prohibited from providing exclusive school bus service unless the service qualifies under an allowable exemption and is approved by the FTA Administrator. In no case can FTA-funded equipment or facilities be used to provide exclusive school bus service.

1. Is exclusive school bus service operated? *Subrecipients are prohibited from providing exclusive school bus service. In no case can federally funded equipment or facilities be used to provide exclusive school bus service.*	

2. Is school "tripper" service provided?
 	
A tripper is an extra bus that is added to a route to provide capacity or service that cannot be accommodated by the buses already in service.
 	
If yes, does the tripper service meet the following criteria to be considered public transit service?
 	
  a. Service is regularly scheduled?
 	
  b. Buses are clearly marked as open to the public?
 	
  c. Buses have no special designations (e.g., school bus, school special)?
 	
  d. Buses use regular bus stops?
 	
  e. Service is noted on published schedules?
 	
If not, the service does not qualify as public transit service and cannot be provided with FTA-funded equipment or out of FTA-funded facilities.
 	
[The reviewer will check all schedules and signs used on buses to ensure that the tripper service complies with the stated criteria.]	

NONDISCRIMINATION IN THE DELIVERY OF SERVICE (TITLE VI)

Subrecipients must not discriminate on the grounds of race, color, or national origin in the delivery of public transit services.

1. Does the transportation program provide service to areas with minority and low-income populations?	
2. How is the public notified of its rights under Title VI? (Website, reception area, meeting rooms, schedules, signs or brochures on buses) Are beneficiaries notified of:	
a. Protections under Title VI?	
b. How to obtain additional information on nondiscrimination obligations?	
c. How to file a complaint?	
d. That information on Title VI obligations and complaint procedures will be translated as needed? *49 CFR 21.9 (d): Subrecipients must notify the public of its protections under Title VI, how to obtain additional information on nondiscrimination obligations, and how to file a complaint. Subrecipients should offer to translate the nondiscrimination obligations and complaint procedures as needed. At a minimum, recipients shall disseminate this information to the public by posting a Title VI notice on the agency's website and in the public areas of the agency's office(s), including the reception desk, meeting rooms, etc. Title VI notices may also be posted at stations or stops, and/or on transit vehicles.*	
3. Have any complaints concerning discrimination in the delivery of service been received since the last review or last grant application? If yes:	
a. Were the complaints reported to MoDOT?	
b. How were the complaints identified and resolved?	

c. Do complaint records include:
 	
    ▪ the date of the complaint was filed?
 	
    ▪ a summary of the allegations?
 	
    ▪ the status of the investigation?
 	
    ▪ the actions taken in response to the complaint?	

4. Have transit employees received training in providing timely and reasonable language assistance to LEP persons? *FTA Circular 4702.1B requires subrecipients to which language assistance services are appropriate. It shall train employees in providing timely and reasonable language assistance to limited English proficient (LEP) persons.*	
5. Since submitting the most recent Title VI plan, have additional language assistance needs been identified? If yes, please describe.	

EQUAL EMPLOYMENT OPPORTUNITY

Subrecipients may not discriminate against any employee or applicant for employment because of race, color, religion, national origin, sex, age, or physical or mental disability. Subrecipients must post notices setting forth an equal employment opportunity (EEO) policy in conspicuous and accessible places and make the EEO policy available to employees and applicants for employment.

1. Does the subrecipient meet the threshold for submitting an EEO program plan to the State? *Unless a program is submitted directly to FTA, a subrecipient must submit an EEO program plan to MoDOT every four years if it has 100 or more transit-related employees **and** receives more than $1 million in FTA capital and/or operating funds or more than $250,000 in planning funds in a year.*	
2. Who (job title) is responsible for ensuring that EEO obligations are fulfilled? To whom (job title) does this individual report for EEO matters?	
3. Has an EEO statement been posted in a conspicuous and accessible place? *An EEO statement must be posted in a conspicuous place where employers and job applicants will see it. Posters are available from the State Department of Labor.*	
4. Is an EEO policy included in your personnel policies and/or employee handbook?	
5. Do all employees have a policies and procedures handbook?	
6. Are EEO statements included on employment application forms and employment notices/job postings?	
7. Were any EEO complaints or lawsuits involving the agency's transportation program received since the last site visit? If yes: Describe the complaint and how it was resolved. What is the process for handling and resolving such complaints? Was MoDOT notified of the complaint?	

PLANNING AND COORDINATION

Subrecipients must incorporate planning activities in the administration of their grants. Subrecipients must coordinate to the maximum extent feasible with other federally-assisted transportation providers.

1. Working with a five-year planning horizon, describe how the agency will address service changes and develop operating budgets which include all revenue sources and capital expenditures needs?	
2. What changes in personnel or service will be required to address any projected revenue shortfalls (federal, state, local, farebox or contract)?	
3. Explain why ridership is increasing, decreasing, or staying the same.	

Fiscal Year (July 1 – June 30)	Ridership
FY 2018	
FY 2017	
FY 2016	
FY 2015	
FY 2014	

4. Are hours and miles being properly reported for NTD?	

5. Describe how the agency is coordinating with other area transportation providers.

Providers	Coordination Efforts/Reasons for Not Coordinating

6. Are there more opportunities for coordination?	
7. Does transit management periodically consult with local planning agencies and governmental units?	

DRUG AND ALCOHOL PROGRAM

Section 5309 and 5311 subrecipients and their contractors must have a drug and alcohol-testing program in place for all safety-sensitive employees. Maintenance contractors for providers in nonurbanized and small urbanized areas are not required to have a drug and alcohol-testing program.

1. Who (Job Title) is the drug and alcohol program manager (DAPM)/designated employer representative (DER)? Has the DAPM signed up for the USDOT Office of Drug and Alcohol Policy and Compliance (ODAPC) email alerts? *If the transportation provider is participating in the MoDOT TPA, please skip to Question 9.*	
2. Who is the consortium/third party administrator (TPA)? The consortium/TPA draws the random sample, contracts the medical review officer (MRO), and usually contracts the collection site. Is there a contract with the consortium/TPA? Does the contract with the consortium/TPA specify that it must comply with USDOT and FTA drug and alcohol-testing requirements (49 CFR Part 40 and 49 CFR Part 655)? *The contract must specify that the testing program must be implemented in accordance with 49 CFR Part 40, "Procedures for Transportation Workplace Drug Testing Programs," as amended, and 49 CFR 655, "Prevention of Alcohol Misuse and Prohibited Drug Use in Transit Operations," as amended.*	
3. What is the name of the drug-testing lab? Is the lab certified by the US Department of Health and Human Services (DHHS)? *The drug testing lab must be DHHS-certified. The current list of certified labs can be found at http://workplace.samhsa.gov/DrugTesting/Level_1_Pages/CertifiedLabs.aspx.*	

4. Who is your medical review officer (MRO)? Is the MRO a licensed physician (medical doctor or doctor of osteopathy), with appropriate medical training and knowledge of substance-abuse disorders? Do you have the MRO's qualifications on file? *The MRO reviews the results of all positive drug tests to confirm that they are truly positive and provides a quality assurance review of the drug testing process. You can obtain the identity and qualifications of the MRO from your consortium/TPA. The MRO must be a licensed physician with appropriate medical training and knowledge of substance-abuse disorders. More information on the qualifications and role of the MRO in the drug testing process can be found in 49 CFR Part 40 Subpart G.*	
5. Who provides the breath alcohol technicians (BATs) or the non-evidentiary alcohol-screening testing technicians (STTs)? Has each BAT and/or STT completed a National Highway Traffic Safety Administration (NHTSA)-approved course of instruction on the methodology, operation, and calibration of the specific evidential breath-testing device (EBT) and/or saliva-testing device (SD) being used by the collection site? Do you have the certificates/qualifications on file? *The BAT and STT work for the collection site. The BAT conducts USDOT breath alcohol screening and confirmation tests while the STT conducts saliva alcohol screening tests. Each BAT and STT must have taken a NHTSA-approved course of instruction on the methodology, operation, and calibration of the EBT or SD being used. Obtain the qualifications of these individuals from the collection site. More information on the role and training requirements of the BAT and STT can be found 49 CFR Part 40 subparts J through N.*	

6. Who provides the urine collectors? Has each urine collector received qualifications training and passed his or her initial proficiency demonstration? Do you have the certificates/qualifications on file? *The urine collectors work for the collection site. The collectors must receive qualifications training in the steps necessary to complete a proper collection, problem collections, fatal flaws, and maintaining the integrity of the collection process. Collectors must then pass a proficiency demonstration consisting of five consecutive error-free collections. More information on the role and training requirements of urine collection personnel can be found in* 49 CFR Part 40 *subparts C through D and I.*	
7. Who is the substance abuse professional (SAP)? Is the SAP a licensed professional with knowledge of and clinical experience in the diagnosis and treatment of drug and alcohol-related disorders? *When an employee or applicant fails a drug or alcohol test, you must refer him/her to a SAP. The SAP conducts a clinical assessment and evaluation of employees that test positive for drugs or alcohol and recommends a treatment program. The SAP must be a licensed professional with knowledge of and clinical experience in the diagnosis and treatment of drug and alcohol-related disorders. If you do not have an SAP directly under contract, contact your consortium/TPA for his or her qualifications. More information on the role of the SAP can be found in* 49 CFR Part 40 *Subpart O.*	
8. How are vendors (e.g., collection sites, MROs) monitored to ensure compliance with program requirements? *Per* 49 CFR 40.11*, an employer is responsible for the actions of all service agents. Monitoring may include conducting periodic mock collections, observing tests, investigating reports by employees of flawed procedures, requiring detailed explanations for cancelled tests, and providing vendors with copies of USDOT and FTA handbooks and procedural manuals.*	
9. Does the drug and alcohol policy contain the required elements? *The reviewer will examine the agency's policy to ensure that it includes the required elements.* 49 CFR 655.15 *states what elements an FTA drug and alcohol policy must contain.*	

10. Is a copy of USDOT regulation, 49 CFR Part 40, "Procedures for Transportation Workplace Drug Testing Programs," readily available to any employee who requests a copy? *A copy of USDOT regulation 49 CFR Part 40, "Procedures for Transportation Workplace Drug Testing Programs," must be made available to employees upon request. On-line availability is acceptable.*	
11. Are the following types of drug and alcohol tests conducted? a) Pre-employment (drugs only) b) Random c) Post-accident d) Reasonable suspicion e) Return-to-duty (second chance only) f) Follow-up (second change only)	
12. Are the following substances tested for: a) Marijuana b) Cocaine c) Opioids d) Phencyclidine e) Amphetamines f) Alcohol *49 CFR 40.85 lists the drugs laboratories test for.*	

13. How does the subrecipient check on the drug and alcohol testing records of new hires and transfers that will work in safety-sensitive positions?	
What information do you obtain from previous employers?	
At what point in the hiring process are applicants placed in safety-sensitive positions?	
After obtaining the applicant's consent, subrecipients must request and review the following information from DOT-regulated employers who have employed the employee during any period during the two years before the employee first performs safety-sensitive functions:	
• *Alcohol tests with a result of 0.04 or higher alcohol concentration*	
• *Verified positive drug tests*	
• *Refusals to be tested (including verified adulterated or substituted drug test results)*	
• *Other violations of DOT agency drug and alcohol testing regulations*	
• *Successful completion of DOT return-to-duty requirements (including follow-up tests), if applicable*	
A release of information form can be found at http://www.transportation.gov/odapc/40_25-release-information-suggested-format.	

14. What positions are in the random testing pool?
 	
Are all positions safety-sensitive?
 	
Are all safety-sensitive positions that support the transit program, including those in other departments such as a central maintenance department, included in the pool and covered by the transit drug and alcohol policy?
 	
49 CFR 655: Covered employees, and only covered employees, are to be in an employer's random testing pool, and all covered drivers must be in the random pool. Safety-sensitive employees are employees that perform the following functions:
 	
• *Operate a revenue vehicle including when not in revenue service*
 	
• *Operate a non-revenue vehicle when required to be operated by a holder of a CDL*
 	
• *Control dispatch or movement of a revenue service vehicle*
 	
• *Maintain, repair, overhaul, or rebuild a revenue service vehicle or equipment used in revenue service with the exception of:*
 	
   All maintenance contractors of subrecipients in UZAs under 200,000
 	
   Subcontractors of maintenance contractors
 	
   Note that contractors that provide maintenance services as an operations contractor are subject to FTA's drug and alcohol testing regulations.
 	
• *Carry a firearm for security purposes*	

15. How often are the names received for random testing from the TPA? Are random tests reasonably spread out during the draw period? Are random tests reasonably distributed across all days and hours of service? Are the date and time of notification and collection documented? *Random tests must be spread throughout the year, the draw period, and the hours of service. The date and time of notification and collection must be documented. 49 CFR Part 40 Subpart E discusses the collection process.* *(The reviewer will examine testing records for the past year.)*	

16. What days and hours is the collection site open? Is the collection site available on all days and during all hours safety-sensitive functions are performed? *Random tests must be conducted during all days and hours safety-sensitive functions are performed.*	
17. Were annual Management Information System (MIS) reports submitted? Do the reports indicate that the subrecipient conducts random testing at least at the required minimum testing rates? *49 CFR 655.72: MIS reports are due annually by March 15. Current FTA minimum random testing rates are 50 percent for drugs and 10 percent for alcohol.*	
18. Do you make proper post-accident determinations in regard to testing? Are post-accident tests of accidents that do not meet the FTA definition of an accident performed under the agency's own authority? *FTA defines accidents as follows:* *Fatal accident: Employers must test all surviving covered employees on duty in the vehicle at the time of the accident and any other covered employee whose performance may have contributed to the accident.* *Nonfatal accidents: Employers must test all covered employees on duty in the vehicle at the time of the accident and any other covered employee whose performance may have contributed to the accident unless the employer determines that an employee's performance did not contribute to the accident. The employer must document the decision on whom to test and not to test.* *The reviewer will examine post-accident testing records to ensure that post-accident is only performed under FTA authority when required by FTA.*	

19. Does the collection site submit the employer copy of the custody and control form (CCF) and alcohol testing form (ATF) to you within 24 hours or the next business day of the collection? Are the employer copies of the CCF and ATF reviewed for completeness and accuracy? If there is a problem with a form, do you follow up with the collection site in writing and ask for documentation of the corrective action? *Per 49 CFR 40.73, the collection site must submit the employer copy of the CCF and ATF to the designated employer representative within 24 hours or during the next business day. Per 49 CFR 40.255, the collection site must transmit the result of the alcohol test to the DER immediately in a confidential manner.* **Note: New CCF must be used effective July 1, 2018.**	
20. Who (job title) maintains the drug and alcohol-testing program records? Are they maintained in a secure location with controlled access? *49 CFR 40.333 addresses record retention and control requirements.*	
21. Are the following records maintained for at least 1 year: a) Alcohol test results less than 0.02 b) Verified negative drug test results	
22. Are the following records maintained for at least 2 years: a) Collection process for alcohol-testing except calibration of EBTs b) Collection process for drug testing c) Alcohol education and training records d) Drug education and training records	
23. Are the records from previous employers kept at least 3 years?	

24. Are the following records maintained for at least 5 years: a) Alcohol test records with alcohol readings of 0.02 or greater b) Drug-test records with verified positive results c) Calibration documentation of EBTs d) SAP evaluations and referrals of employees for alcohol misuse e) Employee compliance with recommendations of the SAP for drug use and/or alcohol misuse, including results of return-to-duty and follow-up testing f) SAP evaluation and referrals of employees for drug use g) MIS reports h) Refusals	
25. Does the testing laboratory only release verified drug test results to the MRO? *Per 49 CFR 40.97, the testing laboratory should only release drug test results to the MRO.*	
26. Are employees and applicants for safety-sensitive positions who have a verified positive drug-test result or a breath-alcohol concentration of 0.04 or greater referred to a SAP for evaluation even if they are to be terminated? *Per 49 CFR 40.287, employers must refer employees and applicants who have a verified positive drug-test result or a breath-alcohol concentration of 0.04 or greater to a SAP for evaluation even if they are to be terminated.*	

27. Have all safety-sensitive employees received 60 minutes of training on the effects and consequence of prohibited drug use on the personal health, safety, and the work environment, and on the signs and symptoms that may indicate prohibited drug use? When is training provided to new hires? Is refresher training provided? If yes, how often? *Per 49 CFR 655.14, safety-sensitive employees must receive at least 60 minutes of training on the effects and consequences of prohibited drug use on the personal health, safety, and the work environment, and on the signs and symptoms that may indicate prohibited drug use.* *The reviewer will examine training records.*	
28. Have supervisors who are designated to determine whether reasonable suspicion exists to require a safety-sensitive employee to undergo alcohol and/or drug-testing been provided the following training? a) At least 60 minutes of training on the physical, behavioral, speech, and performance indicators of probable alcohol misuse. b) At least 60 minutes of training on the physical, behavioral, and performance indicators of probable drug use. Is refresher training provided? If yes, how often? *Per 49 CFR 655.14, supervisors and/or company officers authorized by the employer to make reasonable suspicion determinations shall receive at least 60 minutes of training on the physical, behavioral, and performance indicators of probable drug use and at least 60 minutes of training on the physical, behavioral, speech, and performance indicators of probable alcohol misuse.*	

LEGAL AND GOVERNANCE

Subrecipients must have the legal capacity to receive FTA and State grants. They must have a designated body legally responsible for the organization. The Board should meet regularly, conduct business in an open and transparent manner, set policy and goals and objectives, advise transit management, and not involve itself in day-to-day operations.

1. What is the name of the designated body legally responsible for the overall organization, management, and operation of the transit system?	
2. Are you a county or city? If yes, skip to question 11.	
3. Do the articles of incorporation or ordinance specifically mention public transportation, coordination of transportation or other passenger transportation functions?	
4. Does the Board have written bylaws for its governance which include *(Answer Yes or No):*	
a. Duties and responsibilities	
b. Method of member selection	
c. Terms of office	
d. Frequency and notification of meetings	
e. Conflict of interest statement/code of ethics	
5. What is the size of the Board? Are there any vacancies? If yes, how long have the positions been vacant?	
6. Do Board records indicate that Board minutes are adopted by the Board?	
7. How frequently does the Board meet? (quarterly, monthly, etc.)?	
8. Are Board members provided an agency handbook or policy manual?	
9. To what extent does the Board involve itself in day-to-day operations?	
10. Have Board members received any special training related to their responsibilities?	

11. Is there any pending litigation (disputes, breaches, defaults or other litigation) where the State or Federal government was named or FTA-funded assets could be affected? If yes, has MoDOT been notified?	
12. Have there been any instances of a Board member, employee, agent or third-party contractor submitted a false claim or engaged in fraudulent activity? If yes, were MoDOT, FTA and the USDOT Office of the Inspector General notified? *If the Recipient has credible evidence that a Principal, Official, Employee, Agent, or Third Party Participant of the Recipient, or other person has submitted a false claim under the False Claims Act, 31 U.S.C. §3729 et seq., or has committed a criminal or civil violation of law pertaining to such matters as fraud, conflict of interest, bribery, gratuity, or similar misconduct involving federal assistance, the Recipient must promptly notify the U.S. DOT Inspector General, in addition to the FTA Chief Counsel or Regional Counsel for the region in which the Recipient is located.*	
13. How frequently are financial reports submitted to the Board, Council or Commission for its review and action?	
14. What performance data (cost, revenue, ridership, etc.) are reported to the Board, Council/Commission, or city/county manager? How often are performance measures reported?	
15. Does the transit agency maintain a narrative history or a list of key milestones?	
16. Is there a transit committee to advise the Board/council on transit policy?	
17. Are FTA funds used for lobbying for federal funds? *The use of federal funds for lobbying is prohibited (49 CFR 20.100).*	

18. Have you used non-federal funds for lobbying? If yes, have you filed with the Division the Standard Form-LLL, "Disclosure Form to Report Lobbying" and any necessary updates? *If lobbying services are procured with non-federal funds, the Subrecipient is required to submit the disclosure form, OMB Standard Form LLL (Rev.7-97) to MoDOT for filing with FTA (49 CFR 20.110 and 2 CFR 200.331).*	

CONTROL ENVIRONMENT

Office of Management and Budget 2 CFR Part 200 states, "consideration should be given to the control environment over Federal programs and such factors as the expectation of management's adherence to Federal statutes, regulations, and the terms and conditions of Federal awards and the competence and experience of personnel who administer the Federal programs." An agency's overall control environment sets the tone of the organization and influences the control consciousness of its employees. To successfully address risks and achieve its objectives, agency management must institute various control activities, such as segregation of duties, physical controls, and a system of approvals.

1. Does agency management adequately convey the message that integrity cannot be compromised? How is this communicated to employees?	
2. How does management promulgate internal controls and enforce those controls throughout the agency (e.g., checks and balances, authorizations and approvals, segregation of duties, etc.), and a positive "tone at the top"?	
3. How does management remain abreast of the requirements of laws and regulations pertinent to its business?	
4. Is there a formal (written) conflict of interest policy or code of conduct in effect? How is it communicated to employees? For cities, counties, and transit authorities, has the state code of conduct for public officers and employees, been distributed to officers and employees? *The code of conduct of public officers and employees is governed by Chapter 105 of the Missouri Statutes, Sections 105.450.1, 105.452.1, and 105.454.1.*	
5. Who conducts background and reference checks of applicants?	
6. Are employees who handle cash, securities, and other valuable assets bonded or otherwise covered under an insurance policy?	
7. Has management established procedures to prevent unauthorized access to, or destruction of, documents, records, and assets? If yes, please describe.	

8. Has management established policies for controlling access to computer programs and data files? If yes, please describe.	
9. Are procedures in place to ensure that terminated employees do not have access to documents, records, and assets? If yes, please describe.	
10. Is the Board informed in a timely manner of sensitive information, investigation, and improper acts (e.g., significant litigation, investigations by regulatory agencies, embezzlement, misuses of corporate assets)?	

PROJECT MANAGEMENT/GRANT ADMINISTRATION

Subrecipients must have the technical capacity to implement projects, manage grants, and comply with FTA and State requirements. To demonstrate technical capacity, subrecipients must have an adequate number of staff; maintain adequate documentation of key policies; and submit timely, accurate, and complete quarterly reports.

1. Who (job title) is responsible for the day-to-day management of the transit program?	
2. Describe agency staffing and the responsibilities of key staff. Provide a copy of the organization chart. If you operate from multiple sites, discuss the staffing and responsibilities at each site.	
3. Who (job title) is the designated "back-up" person for the person responsible for the transit program? Has this person attended MoDOT-sponsored meetings and training sessions? If no, why not?	
4. Are agency employees skilled and trained to perform the duties associated with their particular job functions?	
5. What training has the manager and staff undertaken in the past year?	
6. How are financial reports, service reports and statistical data used in day-to-day management of transit service?	
7. Who (job title) is responsible for preparing and submitting reports and reimbursement requests to MoDOT?	
8. Any comments or issues regarding the reports or reimbursement requests? [Insert desk review comments/issues here.]	
9. What three management steps have you taken in the last twelve months that would demonstrate that you have effectively managed your program and displayed sound management practices?	1. 2. 3.

10. Does the organization have a written business continuity plan that addresses maintaining operations after a catastrophic event such as a tornado, flood or fire?	
11. Do you have document control and retention procedures? If yes, do they address:	
a. Records filing and storage	
b. Naming, storing, and backing up electronic files	
c. Document security	
d. Record retention *The Missouri Office of the Secretary of State establishes minimum record retention requirements for local governments.*	
e. Document destruction	
12. Have any special labor protection warranty complaints been received? If yes, were they reported to MoDOT? How were the complaints resolved? *Section 5311 subrecipients must report any special labor warranty complaints and how they were resolved to MoDOT.*	
13. What are the procedures for managing construction projects, including purchase and installation of bus shelters?	

FINANCIAL MANAGEMENT

Subrecipients must have sufficient local resources to provide the required match and carry out the proposed project. Subrecipients must also have the financial management systems to account for and report on FTA and State assistance. Subrecipients must practice sound financial management practices.

FINANCIAL CAPACITY	
1. Does the agency use in-kind contributions for local match? If yes:	
a. List all in-kind contributions and how each is documented and supported, for example, time sheets for volunteer labor or a validation report from a certified real estate appraiser for building space that is used as in-kind building rent. Insert additional rows if necessary. *Subrecipients must maintain supporting documentation for in-kind contributions used as local match. All in-kind contributions must have prior approval from MoDOT.*	

In-kind Contributions (Please List)	Supporting Documentation (Please List)

b. Is the in-kind listed as revenue in addition to an expense in monthly reimbursement requests?	
2. Does the agency have an adequate cash flow? If not, what steps are being taken to ensure this?	
3. Do you have reserves? If yes: What is the amount? How many months of operations will it cover? *MoDOT recommends that subrecipients have at least three months' operating expenses in reserve.*	
4. Since the last review, how many of your transit program vendors were not paid within 30 days?	
5. Since the last review, have any transit employees not been paid when they were due? If yes, why?	

ACCOUNTING SYSTEMS AND GRANT ACCOUNTING	
6. What financial software program is used? Which modules?	
7. Do financial software reports adequately document and track encumbrances of grant expenditures? *2 CFR 200.302 (f): Financial management systems…must be sufficient to permit the preparation of reports required by general and program-specific terms and conditions; and the tracing of funds to a level of expenditures adequate to establish that such funds have been used according to the Federal statutes, regulations, and the terms and conditions of the Federal award.*	
8. Are grant expenditures tracked, reviewed, and billed on a timely basis?	
9. Is appropriate supporting documentation included in grant management files?	
10. Does the agency maintain an up-to-date accounting policies and procedures manual that covers accounting for fixed assets, the budget process, accounts payable process, procurement, payroll, etc.?	
11. Does the agency have written policies and procedures in place for managing federal awards, establishing internal controls, ensuring timely distribution of funds, and determining allowability of costs? Is the coding to FTA grants/projects reviewed and approved prior to posting? *Required by 2 CFR 200.302*	
12. Is an up-to-date chart of accounts maintained and does it completely describe the nature of each account? Provide a copy.	
13. Are financial records kept in accordance with Generally Accepted Accounting Principles (GAAP)?	
14. Does the onsite review of reimbursement requests indicate that the reimbursement requests are accurate and include only eligible costs? *The reviewer will examine the back-up documentation to a monthly reimbursement request during the site visit.*	(Reviewer will answer.)

AUDITS	
15. If more than $750,000 in federal funds (from all federal sources, not just transit funds) were expended during the last fiscal year:	
a. Was a single audit conducted in accordance with federal requirements? *2 CFR 200.501 (a) requires that a subrecipient that expends more than $750,000 in federal funds in a year must have an independent single audit conducted.*	
b. Have you submitted an audit to the state within nine months after the close of the fiscal year? If not, provide a written explanation.	
16. If you have a single or financial audit:	
a. Have corrective actions been implemented addressing the following financial or single audit findings?	

Finding	Corrective Action	Status

b. What is the date of the next scheduled audit?	
17. Since the last site visit, has any other funding agency, such as a State agency or a funding organization, conducted a review or audit of your programs? *If yes, have a copy available for review during the site visit.*	
OVERHEAD/COST ALLOCATION	
18. How do you allocate costs between multiple funding sources?	
19. Are indirect costs charged to grants? **If yes, answer questions a – g**	

Per Office of Management and Budget (OMB) 2 CFR Part 200, indirect costs are costs that are incurred for a common or joint purpose that benefits more than one cost objective and are not readily assignable to the cost objectives specifically benefited without effort disproportionate to the results achieved. Examples of indirect costs are accounting and personnel services.

Subrecipients that charge indirect costs to grants must do so in accordance with a cost allocation plan (CAP) or indirect cost rate proposal (ICRP) that was developed in accordance with 2 CFR Part 200. The rate must be updated annually. The plan must be reviewed by the single auditor. <u>In lieu of a cost allocation plan, a subrecipient may charge a de minimus rate of ten percent.</u>

a. Is there a CAP or ICRP to support indirect administrative costs related to the FTA grant program?	
b. Was the CAP/ICRP developed in accordance with OMB 2 CFR 200?	
c. What federal agency approved the CAP/ICRP? When was the CAP/ICRP last approved? Has the rate been updated annually? *Required by 2 CFR Part 200, Appendices III, V & VII.*	
d. Has the CAP/ICRP been submitted to MoDOT?	
e. Has the CAP/ICRP been followed?	
f. Has the auditor reviewed the CAP/ICRP?	

BUDGET CONTROLS

20. Does the Board approve the budget?	
21. What is the timeline for development of the transit budget?	
22. Is the Board provided a budget with sufficient detail to make decisions about the allocation of program resources?	
23. Are all anticipated farebox revenue, contributions, grants, contracts and other program income projected in the overall transportation budget?	
24. Are reports showing actual versus budgeted expenses and variances being reviewed on a monthly basis? Who performs the comparisons?	
25. When changes are made in the budget line items and funds are transferred between line items, is this being documented?	

26. How is the Board informed of budget changes?	

CASH MANAGEMENT

27. How does the agency ensure the proper handling of cash and checks received in the mail? How is the proper recording of journal entries for incoming cash and checks ensured?	
28. How often are cash receipts deposited?	
29. Who (job title) makes bank deposits?	
30. Does an independent person verify the cash receipts listing against the deposit slips?	
31. Are authenticated deposit slips retained and reconciled to the corresponding amounts in the cash receipts records?	
32. Are banks instructed not to cash checks that are drawn to the order of the agency?	
33. Do bank account reconciliation procedures include:	
a. Accounting for the sequence of all check numbers?	
b. Examination of paid checks for date, name, endorsement, and cancellation and comparison to the cash disbursements journal?	
c. Comparison of bank deposit detail to cash receipts records?	
d. Investigation of other reconciling items (e.g., checks returned for insufficient funds)?	
e. Follow-up on old outstanding checks?	
34. Is an independent review performed of monthly bank reconciliations? Who performs the review?	

FARES, TICKETS AND PASSES

35. Answer (describe where necessary) the following questions:	
a. Are there written procedures for collecting, processing and depositing fares and donations?	

b. What are the procedures for the driver to turn in the fares/donations?	
c. How often are drivers required to turn in the fares/donations?	
d. Where are fares/donations stored until a deposit is made?	
e. How often are the fares/donations deposited? How much is typically deposited at one time?	
f. Who makes the deposit?	
g. Is there a requirement that more than one person be present when fares/donations are counted?	
h. Who reconciles the fares/donations, driver's logs, and scheduler sheets?	
36. If the drivers count fares/donations and do reconciliations, have you designated personnel to monitor these activities?	
37. Are there written procedures governing up-front money that drivers have for making change or other expenditures such as bus washes?	
38. Has the agency implemented risk management procedures such as estimating how much a run should produce based on passenger counts to ensure the proper amount of fares/donations are received?	
39. Do you issue passes? If yes:	Totally beefed up in WV
a. Describe the type (daily, monthly, etc.)	
b. How do you maintain control over the passes?	
c. Are passes individually numbered?	
d. Where are the passes sold?	
ACCOUNTS PAYABLE	
40. Is there a petty cash fund? If yes, are there written policies and procedures in place for petty cash expenditures which include what it is used for and who is eligible to withdraw funds?	

41. Are purchase orders used? If yes, what is the dollar threshold for issuing a purchase order?	
42. Are all cash disbursements made by check or credit card, except those made from petty cash?	
43. Are pre-numbered checks used and all check numbers accounted for?	
44. Are voided checks properly defaced and retained?	
45. Are two signatures required on all accounts (checking, savings, investment, etc.) and checks? Whose signatures are required? For checks, what is the dollar threshold for two signatures?	
a. Are the check signers independent of each other?	
b. Are invoices, vouchers, and other supporting documents presented to each check signer along with the checks needing signature?	
46. Is signing of blank checks prohibited?	
47. Are checks payable to "Cash" or "Bearer" prohibited?	
48. How is access to unused checks limited to authorized persons?	
49. Are supporting documents for checks properly canceled (e.g., stamped "Paid") to avoid duplicate payments?	
50. Do proper safeguards exist to prevent checks that have been mailed from returning to the accounts payable accountant or to the employee who drew the checks?	
51. Are check signers authorized by the Board?	
52. Are all checks promptly recorded upon issuance and listed in detail (e.g., in a check register)?	
53. Are vendors' invoices, receiving reports, and purchase orders matched (i.e., three-way match) before invoices are processed?	

54. Are statements from vendors regularly reviewed and reconciled against recorded liabilities?	
55. Do adjustments to accounts payable (e.g., write-off of debit balances) require the approval of a designated official?	

CREDIT/DEBIT CARDS

56. Are purchases made using credit/debit cards? If yes:	
a. Is there an up-to-date credit/debit card policy outlining procedures for making charges, obtaining documentation, and posting credit card charges to the general ledger?	
b. Who is responsible for authorizing credit/debit card charges?	
c. How many agency credit/debit cards are currently issued?	
d. To whom are they assigned?	
e. What is the purchase dollar limit?	
f. What are the credit limits on each of the cards?	

PAYROLL

57. Are salary and wage rates authorized in writing by a designated official and/or fixed by union contract?	
58. Does the agency cap the amount of sick or annual leave an employee can carry over?	
59. Are detailed records maintained of the agency's liability for vacation pay and sick pay? If yes, are they reconciled to the general ledger accounts periodically?	
60. Are payroll accruals approved by a responsible official?	
61. Does the agency use a time clock and/or timesheets to capture payroll hours for:	
a. General office workers?	
b. Operations/maintenance workers?	

62. If the agency uses a time clock, are time cards:	
a. Punched by the employee in the presence of a designated supervisor?	
b. Signed by a supervisor at the end of the payroll period?	
63. If the agency uses time sheets, are they:	
a. Signed by the employee at the end of the payroll period?	
b. Signed by a supervisor at the end of the payroll period?	
64. Are employees paid out of a separate payroll bank account? If yes, is the payroll bank account reconciled by a designated employee who:	
a. Is not involved in preparing the payroll?	
b. Does not sign the checks?	
c. Does not handle the check distributions?	
INSURANCE	
65. Does management periodically review insurance coverage?	
66. Does the agency carry risk, liability, workman's compensation, and fire insurance?	
67. If self-insured, is there a self-insurance reserve account?	

PROCUREMENT

All subrecipients must comply with the relevant provisions of 2 CFR 200 and FTA Circular 4220.1F. Subrecipients are prohibited from contracting for goods and services from individuals or organizations that have been suspended or debarred from receiving federally assisted contracts. National RTAP has an on-line program called ProcurementPRO that assists subrecipients in conducting FTA-compliant procurements.

1. Who (job title) is responsible for procurement activities?	
2. Does the agency have <u>written</u> procurement procedures that include required state, local, and federal provisions? *Required of subrecipients by 2 CFR 200.318 through 200.326.*	
3. Have procurement procedures been approved by the Board? When?	
4. Does the agency have a written code of standards of ethical conduct governing the performance of employees engaged in the award and administration of contracts that prohibits any employer, officer, or agency from participating in the selection, award, or administration of contracts? *Required of subrecipients by 2 CFR 200.318 (c)(1) & (2).* *The conduct of public officers and employees, including the employees of any city, county, or transit authority, is also governed by Chapter 105 of the Missouri Statutes, Sections 105.450.1, 105.452.1, and 105.454.1.*	
5. Do any potential conflicts of interest exist between policy Board members/employees and consultants/vendors/suppliers or between a management contractor and consultants/vendors/ suppliers?	
6. What are the agency's procurement thresholds and what are the requirements for each?	
7. Who (job title) reviews and approves purchases? What are the dollar thresholds?	
8. Are awards made only to responsible contractors? *Required by 49 USC 5325 (j)*	

9. Does the subrecipient have and follow written procurement protest procedures? *Required by 2 CFR 200.318 (k)*	
10. Were there any non-competitive (sole source, single-bid) procurements since the last review?	
11. Does the subrecipient maintain records sufficient to detail the history of each procurement? *Required by CFR 200.318 (i)*	
12. Does the subrecipient have any revenue-producing contracts, such as for advertising on buses? If so, describe how the procurement was conducted. *FTA Circular 4220.1F requires that revenue-producing contracts be competitively procured.*	
13. Is the documentation for quotes, price sheets, etc., kept for three years after audit?	
14. Describe the vehicle procurement process from the development of specifications to the receipt and acceptance of the vehicles.	
15. Do any FTA-funded transit vehicle contracts exceed five years in length, including base and options? *FTA limits rolling stock contracts, including base and options, to five years.*	
16. What purchases were made with FTA funds since the last site visit? (Examples: fuel, maintenance services, transportation services, professional services such as legal or accounting/audit services, insurance on vehicles and property, etc.)	
a. What procedures were followed for each of the purchases?	
b. Did the procedures followed provide for full and open competition? *Required by 2 CFR 200.319 (a)*	
c. Who (job title) administers the contracts?	
17. Are FTA-required clauses included in all contracts exceeding $10,000 ($2,000 for construction contracts)? *Required by 2 CFR 200 Appendix II*	

18. For procurements greater than $25,000, prior to award, does the subrecipient have documentation that third party contractors are not suspended or debarred? *Subrecipient shall document that it verified that bidders were not excluded or disqualified by:* • *checking SAM Exclusions (at SAM.gov), or* • *collecting a certification, or* • *adding a clause or condition to the covered transaction.*	
19. Have you become aware of any new information, following the award of a contract or subcontract, that an excluded party is involved in any covered transaction? If yes, was MoDOT promptly informed in writing? *Subrecipients must provide immediate written notice to MoDOT for reporting to FTA if they learn that their certification or the certification of any contractors is no longer valid.*	
20. Does the agency contract for transportation services? If yes, has MoDOT been notified? *MoDOT must be made aware of all transportation service contracts. MoDOT reserves the right to review and approve all contracts for transportation services.*	

PROCUREMENT FILE REVIEW SHEET

Awarded To: _____   Amount: _____

Contract Number: _____   Purpose: _____

Award Date: _____   Number of Bids Received: _____

Item	Yes	No	NA
Does the file contain an index or checklist of items that it should contain?			
Are materials filed in chronological order?			
Does the file contain an independent cost estimate (ICE)? *Required only for procurements >$150,000.*			
Does the file contain the rationale for the method of procurement and contract type?			
Does the file contain the invitation for bids or the request for proposals?			
Does the file contain the notices and advertisements?			
Does the file include all bids received?			
Does the file document the evaluation method and the results of the evaluation?			
If a pre-bidders' conference was held, does the file document the bidders notified of the conference, the date and time of the conference, and the list of the attendees?			
If the procurement was a sole source, single bid, brand name, or award to other than low bidder, does the procurement file contain a justification for the award?			
Do the files contain a cost or price analysis? *Required only for procurements >$150,000.*			
Does the file contain a signed contract?			
Do the files indicate that the subrecipient ensured that goods and services were received?			
Does the file include all contract modifications and amendments?			
Does the file contain all correspondence with the vendor?			
Were there were changes orders, or contract amendments? If yes: • Cost justification? • Within scope of the initial contract? • Approved by an authorized official? • All documentation with most current amended contract in file?			

DISADVANTAGED BUSINESS ENTERPRISE

Subrecipients must ensure nondiscrimination in the award and administration of FTA-assisted contracts. Subrecipients also must create a level playing field on which disadvantaged business enterprises (DBEs) can compete fairly for FTA-assisted contracts. MoDOT provides searchable database of DBE firms.

1. Did the subrecipient report on DBE activity in the semi-annual reports? *Subrecipients must submit semi-annual DBE activity reports to MoDOT on or before April 30 and October 30.*	
2. Do the reports indicate that the subrecipient has been successful in contracting with DBEs?	
3. What efforts have been taken to ensure that DBEs have the maximum opportunity to compete for and perform contracts and subcontracts financed in whole or in part with FTA funds? *Subrecipients must ensure that DBEs have the maximum opportunity to compete for and perform contracts and subcontracts financed in whole or in part with FTA funds. Examples of good faith efforts include advertising in newspapers that serve minority communities, maintaining a list of minority vendors, and contacting other agencies for potential DBE contractors.*	
4. Were any DBE complaints received? If yes: Describe the complaint and how it was resolved. What is the process for handling and resolving such complaints? Was MoDOT notified?	

PERSONNEL

Subrecipients should have Board-approved, comprehensive personnel policies. Current job descriptions should be on file for every position.

1. Who (job title) is responsible for personnel management?	
2. Are there written, Board-approved personnel policies? Does the Board approve updates and revisions to the personnel policies?	
3. Have personnel policies been periodically reviewed to ensure compliance with all applicable laws or regulations? When was the most recent revision?	
4. Are there written job descriptions on file for all positions in the transportation program?	
5. Do job descriptions identify:	
a. Job title	
b. Primary responsibilities	
c. Applicable performance standards	
d. Wage rate or salary range	
e. Safety responsibilities	
f. Drug and alcohol testing (if applicable)	
6. Does the agency have a formal employee evaluation process?	
7. Does the agency have a written policy regarding personal use of agency computers and Internet?	
8. How does the agency protect personal identifying information (PII)? *The Department of Homeland Security defines PII as any information that permits the identity of an individual to be directly or indirectly inferred, including any information that is linked or linkable to that individual, regardless of whether the individual is a U.S. citizen, legal permanent resident, visitor to the U.S. PII, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual.*	

SAFETY AND SECURITY

FTA and MoDOT promote development of effective safety and security programs and participation in local and regional emergency preparedness planning.

1. Who (job title) is responsible for system safety? Security?	
2. Is there a written safety plan? Security plan? Emergency preparedness plan? *Due to the sensitive nature of these documents, MoDOT will **not** request electronic copies. The documents are to be reviewed on site.*	
3. Is there a call down list for use in an emergency? If yes, is it up-to-date?	
4. Is the following documentation maintained for **all** drivers of vehicles:	
a. A valid, appropriate vehicle operator's license and current annual physical	
b. A safe driving record acceptable for insurance coverage What is the date of the last driver record check?	
c. Training in defensive driving techniques	
d. Training in passenger assistance and safety (CTAA PASS) Who provides PASS training? How often?	
e. Training in operation of lifts and other accessibility equipment *Required by ADA.*	
f. Training in substance misuse/abuse *Required by FTA.*	
g. Criminal background check	
5. Is there a record of who attended the safety/security training including names, sign-in sheets and the content of the training?	

6. Are printed procedures for handling accidents and medical emergencies kept on board the vehicles?	
7. Are passengers required to wear a seat belt?	
8. Are drivers allowed to bring food or drinks on-board vehicles? If yes, are drivers allowed to eat or drink while the bus is in motion?	
9. Are drivers allowed to use a cell phone while the bus is in motion? Is texting prohibited while the bus is in motion? *The National Safety Council has a model policy available at http://safety.nsc.org/cellphonekit.*	
10. Are all carry-on items properly stowed before moving the vehicle?	
11. Is there a means for identifying severe weather or other hazards that could affect agency operations and potentially trigger transit service shutdown?	
12. How are passengers notified of service disruptions, including those due to inclement weather?	
13. Does the agency have specific procedures and guidelines for drivers to follow when operating in inclement weather conditions in the service area, and have these procedures been formally communicated to drivers? Passengers?	
14. Who (job title) is responsible for investigating accidents?	
15. Describe the procedures for investigating and reporting accidents.	
16. Does the agency have a post-accident packet for supervisors that may investigate an accident; containing necessary forms and documents to ensure compliance with all post-accident policies?	
17. Have fatal accidents been reported to MoDOT? *MoDOT requires subrecipients to immediately report fatal accidents.*	
18. What follow-up action is taken and by whom?	
19. Is information collected on safety incidents? If yes, what is done with the data?	

20. Is there a process for hazard identification?	
21. Are criminal background checks performed on new hires? Employees? How often?	
22. Is training provided in recognizing and reporting suspicious behavior?	
23. What on-vehicle and at-facility crime prevention measures are employed? (Examples: video surveillance, locks, fencing, lighting, silent codes.)	
24. Has the agency familiarized local emergency responders with transit vehicle operation including emergency exits, engine shut off, and mobility device lifts?	
25. Does the agency cooperate with law enforcement, fire departments, emergency medical services on emergency response efforts? What is transit's role in the emergency response plan?	
26. Has the agency conducted or participated in field drills, table top exercises, or assessments of potential emergency events? If yes, when? Please describe.	

INTERCITY BUS

Subrecipients are encouraged to provide meaningful connections to the intercity bus network.

1. Are intercity bus stations/stops served by the transit system? If yes, at what locations and what times? If not, why not? *Four intercity bus companies provide service in Missouri—Greyhound, Megabus, Burlington Trailways, and Jefferson Lines.*	
2. Describe what public information/ marketing efforts have been undertaken to alert riders, intercity bus travelers, and the general public to service connections? *(Examples: stop listed on schedules, connecting service discussed in service brochure, schedules displayed at intercity bus station)*	
3. If intercity bus stops cannot be served at times that would allow for convenient connections, describe when service could be provided and what service adjustments would be required.	
4. What is the agency's policy regarding transporting baggage?	

SERVICE ELIGIBILITY

Section 5311 funds can be used for public transportation projects and intercity projects in nonurbanized areas. Section 5311 services may be designed to maximize use by members of the general public who are transportation-disadvantaged, including seniors and persons with disabilities. Coordinated human service transportation which primarily serves seniors and persons with disabilities, but which is not restricted from carrying other members of the public, is considered available to the general public if it is promoted as public transit service. Subrecipients may use Section 5311 assistance to provide service to and from urbanized areas, but may <u>not</u> use Section 5311 assistance to provide service <u>within</u> an urbanized area. Subrecipients may provide incidental service with FTA-funded vehicles, but the service must not interfere with the provision of transit service and must bear the costs of providing the incidental service.

1. What types of contract service are provided? With what agencies? Does the contract service interfere with the provision of public transit? Have you had to deny public transit trips because the contract service utilized all available capacity? If yes, how often?	
2. Are trips ranked by trip purpose? If yes, provide the order of priority. Does the ranking of trips discourage the general public from using the service? Has service been denied because a trip with a lower-ranked purpose could not be accommodated? If yes, how often? *ADA complementary paratransit trips may not be ranked.*	
3. Are vehicles clearly identified as general public transit service? Is the transit agency phone number on the vehicles? Is the website address on the vehicles?	
4. Are transit vehicles marked in any way that represents exclusive use for a specific organization or clientele?	

5. If you are a nonprofit: How does the agency answer the phone? Is there a direct line for transportation or do all transportation calls go through the general receptionist?	
6. How is the transit service listed in the phonebook?	
7. Is any service provided within an urbanized area (population > 50,000)? If yes: Describe the transit service. Is Section 5311 assistance used to support such service? How are costs allocated between the urbanized and nonurbanized service areas? *Subrecipients may provide service to and from urbanized areas, but may not use Section 5311 assistance to provide service within an urbanized area. Subrecipients must have a MoDOT-approved methodology for allocating costs between urban and rural service.*	
8. Is there meal delivery or other incidental use of FTA-funded transit vehicles? If yes, then answer the following:	
a. How many meals or other incidental services do you deliver?	
b. At what times of the day?	
c. Do the incidental services interfere with the provision of transit service?	
d. Do the incidental services bear the costs of the service?	
e. How much is the transportation program reimbursed for the incidental services?	

MARKETING

Section 5311 subrecipients should have a marketing program that attracts riders and promotes a positive image to the community. Public information should be attractive, widely distributed, and accessible in various formats.

1. Is there a written marketing plan? If so, when was it last updated?	
2. How is transit service advertised? What media are used and how often?	
3. What other types of marketing/promotion are employed for the transit service?	
4. What group from the following list has the most knowledge and name recognition of your service? Older adults (age 60+) Youth (up to age 16) Other ages (age 16-60) Developmentally disabled Other group (Please specify)	
5. Are rider satisfaction surveys conducted? How often? When was the last survey?	
6. Do schedules present:	
a. Route maps that list the time points?	
b. Transfer locations to other routes and systems?	
c. Telephone number?	
d. Website address?	
e. Other (please describe)?	
7. Is there a transit service "brand"? *(A brand consists of a logo and colors that appear on all buses, in facilities, and/or on signage and printed materials to identify the transit service and promote a positive image.)*	
8. How is the public image of transit service enhanced and promoted?	

9. How has the transit agency cultivated working relationships with community leaders? Is transit represented on the local chamber of commerce? Does transit staff attend meetings regularly?	
10. How and where are marketing materials (brochures, schedules) distributed?	
11. Are brochures available at public locations (city hall, courthouse, library, community centers, shopping malls, etc.)?	
12. How is the transit provider notified when brochures need replenishing?	
13. What is the address of the transit agency website?	
14. Who maintains the website?	
15. Is the website formatted for smart phones?	
16. How often is website content reviewed and updated?	
17. Is the web address visible on the buses, printed materials, and business cards?	
18. Does the website provide information on:	
a. Hours and days of service?	
b. Types of service?	
c. How to plan a trip?	
d. Bus schedules and maps?	
e. Public meetings and hearings?	
f. Route and schedule changes?	
g. Transit advisory committee participation and meetings?	
h. Customer service number?	
i. Links to other transit system websites?	
j. Sign up for email or other alerts?	
k. On-line comment form?	

l. Protection under Title VI/how to file a Title VI complaint? (*required*)	
m. Route deviation? (*required*)	
n. ADA complaint procedures *(required)*	
o. ADA reasonable modification requests? (*required*)	
p. Rider guide	
19. What types of social media are used to market the transit system?	

TECHNICAL ASSISTANCE

MoDOT administers the Rural Transportation Assistance Program (RTAP), a program of technical assistance for its subrecipients.
https://www.nationalrtap.org/

1. Describe any training and/or technical assistance requests, needs or recommendations?	
2. Do you have any suggestions on how RTAP funds should be used?	

SWOT ANALYSIS

We will work on this together at the end of the site visit.

Strengths	Weaknesses
Opportunities	**Threats**

ATTENDANCE SHEET

Name	Title	Phone	Email