****

**COMPLIANCE SITE REVIEW (CSR)**

**REFERENCE WORKBOOK**

**Section 5310 Subrecipients**

**Wisconsin Department of Transportation (WisDOT)**

**Bureau of Transit, Local Roads, Rails and Harbors**

**Last Revised:**

**August 2024**

**Please direct any questions to:**

**Diane Paoni, CSR Program Manager**

**Bureau of Transit, Local Roads, Railroads and Harbors**

**Wisconsin Department of Transportation**

**Diane.Paoni@dot.wi.gov (608) 266-1402**

#  INTRODUCTION – WisDOT COMPLIANCE REVIEW PROGRAM

## OBJECTIVE

The objective of the Wisconsin Department of Transportation (WisDOT) - Bureau of Transit, Local Roads, Rails and Harbors Compliance Review Program is to provide a consistent and thorough review of the compliance practices of WisDOT subrecipients that receive Federal funding under the Section 5310 Program. To meet Federal Transit Administration (FTA) requirements, WisDOT must exercise oversight of its FTA grantees, including its Section 5310 subrecipients that provide transportation service primarily for seniors and individuals with disabilities to ensure compliance with applicable state and federal rules and regulations. The Compliance Site Review (CSR) is designed to assist WisDOT and its subrecipients in assessing the administration and implementation of transit programs and services in Wisconsin. All subrecipients with Section 5310 capital grants and/or active assets that were purchased with funds distributed by WisDOT will be monitored through a compliance review. Reviews will also be conducted for Section 5310 subrecipients with operating and/or mobility management grants. Compliance Site Reviews will typically be conducted by WisDOT and RLS & Associates, Inc., the Consultant that is under contract with WisDOT.

WisDOT views these compliance reviews as an opportunity to provide one-on-one technical assistance, specifically tailored to the needs of each transit system, with the goal of reaching compliance in all federal oversight areas, while strengthening managements’ abilities in these areas. The reviews are conducted to identify strengths, areas needing improvement and areas where subrecipients may need additional training and/or technical assistance from WisDOT staff and/or its Consultant. The WisDOT CSR Reference Workbook will be utilized during the review to ensure all topic areas are covered during each CSR.

## HISTORY

The WisDOT Compliance Review Program was established on a five-year cycle beginning in 2015. The majority of the WisDOT Section 5310 systems have undergone a CSR since its inception. The second five-year review cycle was initiated in the fall of 2020. Note that due to COVID-19, reviews began to be conducted virtually. The review of Section 5310 subrecipients with a small number of vehicles may be conducted by desk review only. WisDOT has opted to continue conducting reviews using this virtual format for the foreseeable future to satisfy its obligations of ensuring adequate oversight of subrecipients.

The Consultant will schedule the remote review for a time that is convenient for all participants. The subrecipient will be asked to ensure that key staff members are available for interview during the review, including a contractor if applicable. The timing of the interviews is flexible to limit impact on daily operations.

## SCOPE OF REVIEW

TheCSR Reference Workbook is designed to assist WisDOT, and its Consultant assess how WisDOT Section 5310 funded systems meet the varied compliance requirements imposed by the FTA and WisDOT. The overall goal of the program is to improve the agency’s compliance with applicable regulations while strengthening managements’ abilities in these areas. The review is organized into the following ten major areas:

(1) Program Management/Oversight

(2) Financial Management

(3) Procurement

(4) Asset Management

(5) Service and Operations

(6) Charter and School Bus

(7) Civil Rights

(8) Americans with Disabilities Act (ADA)

(9) Safety and Drug and Alcohol

(10) Miscellaneous Provisions

In those situations where a subrecipient passes grant funds to a lower‐tier entity (e.g., contractor) that will actually operate transit services on behalf of the subrecipient, the review will begin with the subrecipient’s responsibilities to monitor compliance requirements that cannot be passed to the lower‐tier operating entity. It must be verified that the primary subrecipient of FTA funds exercises satisfactory continuing control over all Federally‐funded assets used in the project and maintains title to all project equipment. Once this portion of the review is completed, the remainder of the review will focus on the entity that operates the service.

## Pre-Review Activities

### Prepare the Review Package for a Full Review

The WisDOT CSR Program Manager will send a CSR notification email to each selected subrecipient, informing the subrecipient that they will be contacted by the Consultant to schedule the CSR. Following the subrecipient’s response to the notification email, the Consultant will send a CSR Package to the subrecipient that includes the tentative CSR Schedule and the WisDOT CSR Reference Workbook, which contains a list of documents that should be submitted via upload to WisDOT’s grant management system. The subrecipient will be asked to confirm the date for the CSR and will be provided three (3) weeks to upload the requested documents, including a completed CSR Reference Workbook. WisDOT and its Consultant will provide log in information to the remote platform prior to the review. Note that it is the responsibility of the subrecipient to forward the log in information to the contractor, if applicable.

### Desk Review

Some subrecipients with smaller programs will only have a desk review. Subrecipients will be asked to submit documents prior to the review as they would for the full review described above. The desk review will allow WisDOT and its Consultant to become familiar with the subrecipient and identify any areas needing further attention. Subrecipients should upload the applicable listed documents below to WisDOT’s grant management system by the deadline set by the Consultant. If utilizing a contractor, the subrecipient will need to obtain any required documentation from the contractor for upload. Subrecipients undergoing a Desk Review will not have a full virtual review meeting but will interact with the Consultant and WisDOT’s civil rights compliance manager. Subrecipients should contact the Consultant if there are any questions regarding applicable documents and/or if need any assistance with the uploading process.

**Requested Document Upload Checklist**

|  |
| --- |
| **Program Management/Oversight**  |
| Click or tap here to enter text. | Completed CSR Reference Workbook |
| Click or tap here to enter text. | Copies of any subcontracts with lower-tier operators |
| Click or tap here to enter text. | Grant Certifications and Assurances |
| Click or tap here to enter text. | Contractor oversight records |
| **Financial Management** |
| Click or tap here to enter text. | Chart of accounts\* |
| Click or tap here to enter text. | Approved budget |
| Click or tap here to enter text. | Written financial management policies and procedures\* |
| Click or tap here to enter text. | Written grants management policies and procedures\* |
| Click or tap here to enter text. | Financial documentation (e.g., receipt books, tickets/passes, spreadsheets)\* |
| Click or tap here to enter text. | Documentation for any contracted service with local organizations (e.g. human service organizations, universities, employers, etc.) |
| Click or tap here to enter text. | Documentation for any claimed in-kind expensesMost recent financial audit/financial statement |
| Click or tap here to enter text. |  |
| Click or tap here to enter text. | Transit General Ledger for most recent quarter\* |
| Click or tap here to enter text. | Approved Indirect Cost Allocation Plan\* |
| Click or tap here to enter text. | Past year WisDOT quarterly invoices\* |
| **Procurement** |
| Click or tap here to enter text. | Written procurement policies and procedures |
| Click or tap here to enter text. | Code of conduct governing personnel involved in procurement (if not included in written procurement policy) |
| Click or tap here to enter text. | Procurement records, including copies of agreements |
| Click or tap here to enter text. | Non-accessible vehicle acquisition certification (if applicable) |
| Click or tap here to enter text. | Pre-award and post-delivery audits (if applicable) |
| Click or tap here to enter text. | Buy America certifications (if applicable) |
| **Asset Management** |
| Click or tap here to enter text. | Transit vehicle inventory |
| Click or tap here to enter text. | Vehicle preventive maintenance plan  |
| Click or tap here to enter text. | Facility maintenance plan (if federally-funded or state-funded facilities are owned by the system |
| Click or tap here to enter text. | Certificate of insurance documenting coverage levels, additional insured, etc. |
| Click or tap here to enter text. | Vehicle fleet inventory |
| Click or tap here to enter text. | Pre trip vehicle inspection forms |
| Click or tap here to enter text. | Vehicle and facility lease agreements (if any) |
| Click or tap here to enter text. | Vehicle replacement schedule |
| Click or tap here to enter text. | Randomly selected vehicle maintenance records |
| Click or tap here to enter text. | Vehicle accident records |
| Click or tap here to enter text. | Completed Vehicle Visual Inspection Forms (2) |
| **Service and Operations** |
| Click or tap here to enter text. | Organizational chart |
| Click or tap here to enter text. | Employee manual |
| Click or tap here to enter text. | Job descriptions |
| Click or tap here to enter text. | Copy and description of fare structure  |
| Click or tap here to enter text. | Driver manual/operating policies and procedures documents |
| Click or tap here to enter text. | Marketing materials including brochures and route maps |
| Click or tap here to enter text. | Rider guidebook |
| Click or tap here to enter text. | Training curriculum outline |
| Click or tap here to enter text. | Training records example |
| **Charter and School Bus** |
| Click or tap here to enter text. | Charter reports, last year (if applicable) |
| Click or tap here to enter text. | Contracts with all entities that purchase contracted service from the subrecipient (if applicable) |
| **Civil Rights** |
| Click or tap here to enter text. | Most recent Title VI Plan |
| Click or tap here to enter text. | Title VI complaint records/lawsuits since last review |
| Click or tap here to enter text. | EEO Program (if applicable) |
| Click or tap here to enter text. | Sample job application and job posting |
| **Americans with Disabilities Act (ADA)** |
| Click or tap here to enter text. | ADA-related service and operating policies |
| Click or tap here to enter text. | Copies of any complaints filed against the subrecipient alleging discrimination on the basis of disability in service delivery (filed since last review) along with a statement of resolution/outcome |
| Click or tap here to enter text. | Complementary paratransit application and guidelines (if applicable) |
| Click or tap here to enter text. | Copy of any policy that could result in service suspension (e.g., no-show, disruptive behavior, etc.) |
| Click or tap here to enter text. | Written appeal process for service suspension |
| Click or tap here to enter text. | Trip denial form |
| Click or tap here to enter text. | Written reasonable modification policy |
| **Safety and Drug and Alcohol** |
| Click or tap here to enter text. | System safety and security policy and procedures |
| Click or tap here to enter text. | Drug and Alcohol Testing Policy |

**Miscellaneous Provisions**

|  |
| --- |
| Click or tap here to enter text. |
| Click or tap here to enter text. |

Transportation Coordination

Training

***\*Only applicable if Section 5310 funds used for Mobility Management or operations.***

Please **UPLOAD** the requested documents to WisDOT’s Grants Management System under the “Resources” tab, 2024-2025 Compliance Review file, click on the add button, and select file (this system does not allow you to upload multiple documents at one time, you will need to place all of your documents into a zip folder on your computer before uploading to upload multiple files. Please feel free to contact Diane Paoni with WisDOT at Diane.Paoni@dot.wi.gov if you need assistance with uploading.

### Schedule the Virtual Review

WisDOT and/or its Consultant will schedule the virtual review for a time that is convenient for all participants. Typically, the review will be limited to one half day. The subrecipient will be asked to ensure that key staff is available to participate in the review. **For those subrecipients that contract their operations to a lower‐tier entity/contractor, it is the responsibility of the subrecipient to ensure that the contractor participates in the review.**

## The Review

### Introductions

The CSR begins with introductions with subrecipient staff, WisDOT staff and its Consultant. The introduction is an orientation and introduction to the review, a time for defining the scope of the CSR, the role of WisDOT and the Consultant in the review, the meeting agenda, objectives for the review, and post CSR tasks/responsibilities.

### Review

The CSR for Section 5310 subrecipients generally takes about four hours. For larger or more complex subrecipients, the review schedule could take longer. This CSR Reference Workbook will focus discussion during the review, outlining key topic areas and questions that will be asked.

For the virtual reviews, screenshots or screen sharing capabilities of the software platforms will be used to exchange or verify information when electronic files are not available. As appropriate, the subrecipient may be requested to take pictures of specific and narrowly‐defined portions of records (e.g., vehicle history, work order) when electronic files are not available. Pictures of vehicles and related equipment may also be needed. WisDOT and/or the Consultant will provide subrecipients with templates or “best practice” sample material to assist subrecipients develop FTA-compliant policies and procedures.

### Review Meeting Summary

At the conclusion of the review, a meeting summary with subrecipient representatives will be conducted to discuss compliance deficiencies/findings and advisory recommendations. A finding represents an area of Federal or state compliance that is currently not addressed appropriately. Some of the initial findings discussed during the meeting summary could change after additional information and documentation is provided, or with further analysis. It is also possible that a finding will require a follow-up for additional review.

##

## Post Review

WisDOT’s goal is to send the subrecipient a draft Corrective Action Plan (CAP) within two weeks of completion of the Compliance Site Review. This document lists WisDOT’s findings, advisory recommendations, recommended timeframe for resolution of the deficiencies, and provides a column for the subrecipient to note the action steps to correct the findings. The subrecipient will be provided one week to review the draft CAP and provide comments to the Consultant. Notwithstanding any subrecipient rebuttal to the Corrective Action Plan, at the end of the one-week review period, the report will be accepted by the subrecipient and WisDOT and an implicit cooperative commitment to remedy the compliance deficiencies will be established between WisDOT, the Consultant and the subrecipient.

Note that in those situations where the subrecipient has a finding it would like to contest, the subrecipient should identify the finding and submit documentation to WisDOT and the Consultant substantiating why the finding is considered to be in error.

The subrecipient will have two weeks (14 days) to submit the CAP to the Consultant with the Action Steps column completed. Following the Consultant’s review of the action steps, there will be a 90-day remediation period during which WisDOT expects the subrecipient to satisfactorily resolve all compliance findings. During the period, the Consultant will be available to assist the system; provide examples of policies, procedures, and best practices; and review subrecipient proposals for compliance remedies.

The Consultant, working closely with WisDOT staff, will monitor the subrecipient’s status toward the

closure of all findings. WisDOT and its Consultant will review and approve the action steps. After acceptance of the action steps, the Consultant will maintain regular contact with the subrecipient and provide the technical assistance necessary to ensure the CAP is completed and all findings closed. The only exception is that WisDOT will provide assistance and review policies completed for the Civil Rights section of the review. With the exception of Civil Rights, the subrecipient should submit documentation/evidence to the Consultant to address the recommended actions/action steps as the prepared documentation/evidence is finalized. The subrecipient should also upload to WisDOT’s grant management system all documentation completed in response to the CAP.

WisDOT and the Consultant will strive to close all CSRs within 90 days of the initial remote review.

***Please Note: Non-completion of the Compliance Review Program and the Corrective Action Plan Recommended Action items will be considered non-compliant and will be evaluated during future application processes.  A non-compliant rating on the Compliance Review will affect current quarterly reimbursements and/or future grant awards.***

## Instructions and Information

⮊ All questions contained in the workbook must be answered. Detailed responses to questions are most helpful, particularly with the remote review format.

* The workbook is set up so you may answer the questions within the document. Check boxes are to the left of each “yes or no” answer. A shaded space is in place to type in answers that require a name, date, or explanation etc.
* Subrecipients should check the UPLOADED Document box) throughout the sections of the Workbook to ensure all documents have been uploaded for review.

⮊ Responder should answer questions as completely as necessary for the Consultant to make an assessment.

⮊ Responder may use “N/A”, if the question is not applicable to their organization. However, if the Consultant finds that the question must be answered, you will be asked to fill in that information.

⮊ Read the narrative descriptions for each review category prior to answering the questions.

**⮊** Questions regarding the workbook may be directed to Charles Glover, RLS & Associates, Inc.,

 cglover@rlsandassoc.com or 919-971-5668.

**⮊** Electronic submission of the work and requested documents are required.

Requested documents (pg. ii-iii) and the completed workbook can be uploaded through WisDOT’s grant management system (<https://secure.blackcatgrants.com/Default.aspx?site=widot> ). Your completed workbook and additional materials can be uploaded under the resources tab, click on the 2024-2025 Compliance Review file.

After completion of the upload, you must email the RLS Consultant – cglover@rlsandassoc.com - to inform the Consultant that the documents are available for review.

Subrecipient Information

Please fill in the information in the adjacent column

|  |  |
| --- | --- |
| **Subrecipient:** | Click or tap here to enter text. |
|  Address: | Click or tap here to enter text. |
|  Phone No. (include area code) | Click or tap here to enter text. |
|  Fax: | Click or tap here to enter text. |
|  Website: | Click or tap here to enter text. |
| **Contact Person:** | Click or tap here to enter text. |
|  Phone No. (include area code) | Click or tap here to enter text. |
|  Email: | Click or tap here to enter text. |
| **Contract Service Provider (if applicable):** | Click or tap here to enter text. |
|  Contact Name: | Click or tap here to enter text. |
|  Phone No. (include area code) | Click or tap here to enter text. |
|  Email: | Click or tap here to enter text. |
| **Organizational Structure:** | Click or tap here to enter text. |
|  Non-Profit  | Click or tap here to enter text. |
|  Government Entity | Click or tap here to enter text. |
| **Brief Description of Transportation Service Funded:** | Click or tap here to enter text. |
| **Approved Service Area (from coordinated plan)**: | Click or tap here to enter text. |
| **Federal/State Funding Received in the past three years****(check all that apply)** |[ ]  5310 Operating funds |
|  |[ ]  5310 Capital funds – vehicles |
|  |[ ]  5311 Capital funds – purchase of service |
|  |[ ]  5310 Mobility Management funds |
|  |[ ]  85.21 State Funds – County |
|  |[ ]  85.215 State Funds – Tribal Transport for Elders |
|  |[ ]  85.22 State Funds – Capital |
|  |[ ]  5311 Operating funds |

**TABLE OF CONTENTS**

***Note: not all areas are applicable to all subrecipients***

[PROGRAM MANAGEMENT Section 1 1](#_Toc173750147)

[1.1 | General Eligibility 1](#_Toc173750148)

[1.2 | Legal Authority 2](#_Toc173750149)

[1.3 | Certifications and Assurances 2](#_Toc173750150)

[FINANCIAL MANAGEMENT Section 2 4](#_Toc173750151)

[2.1 | Accounting Practices (OPERATING AND MOBILITY MANAGEMENT GRANTS ONLY) 4](#_Toc173750152)

[2.2 | Indirect Costs (OPERATING AND MOBILITY MANAGEMENT GRANTS ONLY) 5](#_Toc173750153)

[2.3 | Internal Controls (OPERATING AND MOBILITY MANAGEMENT GRANTS ONLY) 6](#_Toc173750154)

[2.4 | Documentation of Costs (OPERATING AND MOBILITY MANAGEMENT GRANTS ONLY) 7](#_Toc173750155)

[2.5 | Budget 7](#_Toc173750156)

[2.6 | Financial Reporting 8](#_Toc173750157)

[2.7 | Local Match 8](#_Toc173750158)

[2.8 | A-133 Audit 9](#_Toc173750159)

[PROCUREMENT Section 3 11](#_Toc173750160)

[3.1 | Standards of Conduct 11](#_Toc173750161)

[3.2 | Pre-Award and Post Delivery Audit 12](#_Toc173750162)

[3.3 | Purchase of Service Contracts (5310 Operating only) 12](#_Toc173750163)

[ASSET MANAGEMENT Section 4 13](#_Toc173750164)

[4.1 | Continuing Control of Assets (Vehicles) 13](#_Toc173750165)

[Vehicle Maintenance Records 13](#_Toc173750166)

[Vehicle Records Review 14](#_Toc173750167)

[Vehicle Visual Inspection Form 16](#_Toc173750168)

[SERVICE AND OPERATIONS Section 5 17](#_Toc173750169)

[5.1 | Service Records 17](#_Toc173750170)

[5.2 | Operational Efficiencies, Goals and Data Collection 17](#_Toc173750171)

[5.3 | Operational Employees 18](#_Toc173750172)

[Charter Bus and School Bus Section 6 19](#_Toc173750173)

[6.1 | Charter Bus 19](#_Toc173750174)

[6.2 | School Bus 20](#_Toc173750175)

[Civil Rights Section 7 21](#_Toc173750176)

[7.1 | Title VI 21](#_Toc173750177)

[7.2 | Equal Employment Opportunity (EEO) 23](#_Toc173750181)

[7.3 | Disadvantaged Business Enterprises (DBE) 24](#_Toc173750182)

[Americans with Disabilities Act (ADA) Section 8 26](#_Toc173750183)

[8.1| Nondiscrimination 26](#_Toc173750184)

[8.2| Vehicles – General 27](#_Toc173750185)

[8.3| Demand-Response Services: Equivalent Service Standards 28](#_Toc173750186)

[8.4| Reasonable Modification 29](#_Toc173750187)

[Safety and Drug and Alcohol Section 9 31](#_Toc173750188)

[9.1| Nondiscrimination System Safety and Security Policy and Procedures 31](#_Toc173750189)

[9.2| Drug and Alcohol 32](#_Toc173750190)

[Miscellaneous Provisions Section 10 33](#_Toc173750191)

[10.1 | Transportation Coordination 33](#_Toc173750192)

[10.2 | Training 33](#_Toc173750193)

[Survey 35](#_Toc173750194)

**Please note: Because this is a Word document that allows you to fill in form, the page numbers may not be exact as you add information. The section numbering will stay consistent**.

Site Review Attendance Sheet (completed by Consultant)

# ATTENDANCE SHEET

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Name | Title | Organization | Phone | Email |
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# PROGRAM MANAGEMENT Section 1

## 1.1 | General Eligibility

Eligible recipients of FTA Section 5310 funds from WisDOT include private non-profit organizations and state or local governmental authorities if they are approved by WisDOT to coordinate services for seniors and individuals with disabilities; or if there are no non-profit organizations readily available in the area to provide the service.

1. **What is the name of the agency that is party to the subrecipient’s grant agreement with WisDOT?**

Click or tap here to enter text.

1. **What is the organizational status of the entity that is party to the subrecipient’s grant agreement with WisDOT?**

[ ]  Private non-profit organizations

[ ]  Local public bodies that:

* Certify that there are no non-profit organizations readily available in the area to provide the service. **or**
* Are approved by the State to coordinate services for seniors and individual with disabilities and certified that the local public body is approved as the coordinator of transportation services in the proposed service area. This approval must come from **either** a Transportation Coordinating Committee or all county boards covering the service area.
1. **If a private non-profit organization, are there articles of incorporation to establish the existence of the organization?** [ ] Yes [ ] No
2. **What role does the governing body have regarding transit service?** Click or tap here to enter text.
3. **What capital, Vehicle or Mobility Management, projects were funded under Section 5310?**

Click or tap here to enter text.

1. **Has the subrecipient published a public notice describing its most recent Federal grant application? Which of the following methods of public notice have you used?**

**Insertion in a local newspaper serving the proposed service area; posting in accessible public buildings; posting in transit vehicles; an official internet site used by the transit system.**

Click or tap here to enter text.

1. **Are 5310 funds used to support the provision of transportation services to meet the specific needs of seniors and individuals with disabilities?** [ ] Yes [ ] No
2. **Does the subrecipient contract service to a third-party provider who is the operator and/or provider of the public transit services?**

[ ] Yes [ ] No If yes provide name: Click or tap here to enter text.

1. **Does the subrecipient utilize FTA funds to support any lobbying activities?** [ ] Yes [ ] No

## 1.2 | Legal Authority

Subrecipients must have designated a body legally responsible for the overall organization, management and operation of the transportation system. The officials acting on behalf of subrecipients must have the appropriate authority. This is usually documented in an authorizing resolution passed by the governing body.

1. **Does the subrecipient have written authorization documents (Authorizing Resolution)?**

[ ] Yes [ ] No [ ]  Upload of document complete

1. **Identify individuals responsible for each item:**

|  |  |
| --- | --- |
| Designated Authority (highest ranking official): | Click or tap here to enter text. |
| Authorized Official (person delegated to execute agreements, sign legally binding documents, etc.): | Click or tap here to enter text. |
| Responsible for the financial management of the transit program: | Click or tap here to enter text. |
| Who signs the Certifications and Assurances? | Click or tap here to enter text. |
| Is responsible for the day-to-day management of transit related responsibilities: | Click or tap here to enter text. |
| Maintains oversight of the third-party contractor or lessee, if applicable: | Click or tap here to enter text. |

1. **Is there a governing board resolution or other appropriate action that approves this delegation of authority?**

**Name of governing board** Click or tap here to enter text.

1. **Are agency employees (skilled and trained to perform the duties associated with their job functions (e.g., daily management of staff, accounting functions, delivery of services)?**

[ ] Yes [ ] No

1. **If the subrecipient contracts with a third-party contractor or lessee to operate the transit service, how do staff maintain oversight of the third-party contractor or (e.g., operational reports, financial reports, communications, meeting schedule, vehicle maintenance records, etc.)?**

Click or tap here to enter text.

1. **Does the subrecipient have vehicle lease agreement(s) in those situations where the grantee has another entity operating the agency owned vehicle(s)?**

[ ] Yes [ ] No [ ]  Upload of all lease agreements complete

**1.3 | Certifications and Assurances**

To receive a grant under any FTA-administered programs, WisDOT must annually assure FTA that WisDOT and subrecipients meet certain requirements. WisDOT is responsible for maintaining adequate files documenting the basis for all assurances which it makes to FTA. Each fiscal year, FTA publishes the required certifications and assurances in the *Federal Register.* This notice indicates which certifications and assurances apply to all grantees or to certain kinds of awards, and which are required for grants under specific sections. WisDOT, as the FTA recipient, must electronically submit the appropriate certifications and assurances each fiscal year for all active grants and new grants that it expects FTA to make during that fiscal year. Subrecipients are also expected to submit appropriate certifications and assurances to WisDOT.

|  |  |  |
| --- | --- | --- |
|  | **Has the subrecipient submitted the properly completed Annual Certifications and Assurances?** | [ ]  Yes [ ]  No |
|  | **Were the Annual Certifications and Assurances signed by an authorized official with proper authority?** | [ ]  Yes [ ]  No |
| If “yes,” provide name and position: Click or tap here to enter text. |

# FINANCIAL MANAGEMENT Section 2

|  |
| --- |
| **Does the subrecipient have written financial management and cash control procedures?**[ ] Yes [ ] No**Does the subrecipient receive operating funding or mobility management funding?**[ ] Yes [ ] No**If yes, you must answer all the question in this financial management section.****Does the subrecipient receive vehicle only funding** [ ] Yes [ ] No **If yes to vehicle funding only– skip to 2 .5 | Budget** |

All subrecipients are required to establish and maintain an accounting system to which all transportation-related costs, revenues and operating costs are recorded so that they may be clearly identified, easily traced and substantially documented. The fully allocated cost of the public transit program must be clearly identified regardless of the operational nature of the agency.

## 2.1 | Accounting Practices (OPERATING AND MOBILITY MANAGEMENT GRANTS ONLY)

Grantees and third-party contractors are responsible for establishing and maintaining adequate internal control over all their functions that relate to project administration and execution.

[CFR Super Circular Part 200 (OMB A-87)](http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl) indicates that reports reflecting the distribution of activity for each employee must be maintained for all staff members whose compensation is charged, in whole or in part, directly to a grant award.

Time charged to FTA funded programs must:

* Reflect after‐the‐fact determination of actual activity (not percentage);
* Account for the total activity of the employee;
* Be signed by the individual employee; and
* Be prepared at least monthly and coincide with one or more pay periods.

Financial records, supporting documentation and all other records pertinent to a grant must be retained by the subrecipient and must be made readily available to authorized representatives of the U.S.DOT and the Comptroller General of the United States for a period of three (3) years plus current year following closure of the grant.

If any litigation, claim or audit is started before the expiration of the three‐year period, the records must be retained beyond three (3) years, until all litigation, claims or audit findings involving the records have been resolved.

1. **Does the subrecipient have written financial management policies and l procedures?**

[ ] Yes [ ] No

  **If Yes, do they address determining the allowability of costs as required by 2 CFR § 200.302(b)(7)?**

[ ] Yes [ ] No

1. **Are your charts of accounts sufficiently detailed to accumulate project revenues and expenses in detail?**

[ ] Yes [ ] No

1. **Is the chart of accounts sufficiently detailed to distinguish between project capital (vehicle), operating, and Mobility Management expenses, if applicable?**

[ ] Yes [ ] No [ ] N/A (Only one activity - Vehicle **or** Mobility Management)

1. **Federal cost principles require that all costs incurred under a grant must be “reasonable and necessary.” Does the subrecipient have a process in place to determine reasonable and necessary costs prior to making the expenditure?** [ ] Yes [ ] No

If “Yes,” what are these procedures? Click or tap here to enter text.

1. **Does the subrecipient regularly monitor actual expenses against its approved budget?**

[ ] Yes [ ] No

1. **Does the subrecipient adhere to the requirement that all financial records pertaining to a Federal grant be retained for three (3) years plus current year following the final payment?**

[ ] Yes [ ] No

1. **Does the subrecipient provide service under contract to human service agencies?**

[ ] Yes [ ] No [ ]  Upload of contract complete

If yes, what is the frequency for issuing invoices to the contracting organization?

Click or tap here to enter text.

1. D**oes the subrecipient incur costs for the administration and management of the grant(s) that are billed to WisDOT?**

[ ] Yes [ ] No

1. **Has the subrecipient been requesting reimbursement from WisDOT at least quarterly?** [ ] Yes [ ] No

## | Indirect Costs (OPERATING AND MOBILITY MANAGEMENT GRANTS ONLY)

Indirect costs are those: (a) incurred for a common or joint purpose benefiting more than one cost objective, and (b) not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. The term "indirect costs," applies to costs of this type originating in the grantee department, as well as those incurred by other departments in supplying goods, services and facilities.

1. **Does the subrecipient seek reimbursement of indirect costs in its claims under its various Federal grant awards?**

[ ] Yes [ ] No

**If yes, does the subrecipient have an Indirect Cost Allocation Plan (CAP) or Negotiated Indirect Cost Rate Agreement (NICRA) that has been submitted for approval to a cognizant Federal agency?** [ ] Yes [ ] No [ ]  Upload of CAP and/or NICRA complete

1. **Is the Cost Allocation Plan (CAP) updated annually or on a multi-year period as required by the cognizant agency for indirect cost?**

[ ] Yes [ ] No [ ] N/A

**If yes, what is the date on the latest approved CAP?** Click or tap here to enter text.

1. **Does the subrecipient claim the de minimis indirect cost rate (10% of Modified Total Direct Costs)? (Note: the rate is increasing from 10 to 15 percent effective 1/1/25)**

[ ] Yes [ ] No

1. **Are claims for reimbursement of indirect costs made in accordance with the latest approved indirect cost rate?**

[ ] Yes [ ] No [ ] N/A

1. **Is the indirect cost rate claimed across all federal grants?** [ ] Yes [ ] No [ ] N/A

## 2.3 | Internal Controls (OPERATING AND MOBILITY MANAGEMENT GRANTS ONLY)

Subrecipients are responsible for establishing and maintaining adequate internal controls over all functions that affect implementation of a grant. To ensure proper accountability for grant funds, internal controls must be integrated with the management systems used by the grantee to regulate and guide its operations.

1. **Does the subrecipient’s formal organizational structure clearly define, assign and delegate appropriate authority for all financial management duties? (For example, consider how is the security of financial data maintained?)**

[ ] Yes [ ] No

1. **Given the size of the subrecipient, is there sufficient segregation of duties in financial management functions to ensure the adequate internal checks and balances exist?**

[ ] Yes [ ] No

If yes, what are these procedures? (who receives invoice, writes checks, signs checks)

Click or tap here to enter text.

1. **Who has access to financial records?** Click or tap here to enter text.
2. **How often is the financial system backed-up?** Click or tap here to enter text.
3. **Is it backed-up to an off-site location? (i.e., cloud or off-site server)** [ ] Yes [ ] No
4. **Does the subrecipient require pre-authorization for all reimbursable expenses to employees?**

[ ] Yes [ ] No

1. **Are bank accounts reconciled on a regular basis?**

[ ] Yes [ ] No **How often?** Click or tap here to enter text.

**Name and title of person who performs the reconciliation?** Click or tap here to enter text.

1. **Does anyone in the organization oversee and/or review the work of the individual assigned to reconcile bank statements (e.g., is there sufficient separation of function)?**

[ ] Yes [ ] No **Title of person who oversee?** Click or tap here to enter text.

1. **Are procedures in place to complete projects and close out grants in a timely manner?**

[ ] Yes [ ] No

## 2.4 | Documentation of Costs (OPERATING AND MOBILITY MANAGEMENT GRANTS ONLY)

There are special requirements for the documentation of personnel expenses, particularly those employees whose time is split between (a) more than one Federal award; (b) a Federal award and a non‐Federal award; (c) an indirect cost activity and a direct cost activity; (d) two or more indirect activities which are allocated using different allocation bases; or (e) an unallowable activity and a direct or indirect cost activity.

1. **Does the subrecipient maintain proper supporting documentation for costs and routine purchases?**

[ ] Yes [ ] No [ ]  Upload of sample invoice and supporting documentation complete

**Does a sample invoice include the proper supporting documentation?**

 [ ] Yes [ ] No

1. **How does the subrecipient support personnel charges made to Federal grants particularly with volunteer hours charged as in-kind match?**

[ ] N/A **Explain:** Click or tap here to enter text.

1. **Do the impacted personnel maintain personal activity reports/timesheets consistent with Office of Management and Budget (OMB) requirements:**

[ ]  Reflect an after-the-fact distribution of the actual activity of each employee.

[ ]  Account for the total activity for which each employee is compensated.

[ ]  Are the reports prepared at least monthly and must coincide with one or more pay periods?

[ ]  Are the reports signed by the employee?

1. **Does** **the subrecipient adequately ensure the timely deposit of cash receipts to prevent fraud or loss, as well as sufficient separation of functions to provide adequate checks and balances in the cash handling process?**

[ ] Yes [ ] No

## 2.5 | Budget

Applicable Office of Management and Budget (OMB) cost principles, as stated in [CFR Super Circular Part 200 (OMB A-87)](http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl), agency program regulations, and the terms of grant and subgrant agreements will be followed in determining what costs can be charged to the grant program.

Accounting records must be supported by such source documentation as cancelled checks, paid bills, payrolls, time and attendance records, contracts, and subgrant award documents. (**Budget paragraph defined above pertains to Mobility Management/Operating. Questions below pertain to all agencies.**

 [ ]  Upload of last approved transit budget complete

1. **Who is responsible for developing the budget?**

**Name(s):** Click or tap here to enter text.

1. **How is the budget developed?**

**Explain:** Click or tap here to enter text.

1. **Who is responsible for approving the budget?**

**Name(s):** Click or tap here to enter text.

1. **How is the budget managed throughout the year?**

**Explain:** Click or tap here to enter text.

1. **Who is responsible for ensuring the costs are allowable and consistent with the project budget and the limitations set forth in the grant agreement?** Name(s) Click or tap here to enter text.

## 2.6 | Financial Reporting

Subrecipients that contract service through a competitive procurement is required to maintain and report their own administrative expenses plus amounts paid to the contract operator. Contract operators may continue to use their own accounting system, so long as that system reports financial information in accordance with WisDOT’s standardized account code structure.

1. **Does the subrecipient submit its 5310 Quarterly Ridership Report within 30 days of the close of each quarter?** [ ] Yes [ ] No [ ]  Upload document to BlackCat complete (last 4 quarters)
2. **Does the subrecipient the subrecipient submit its 5310 Quarterly Reimbursement Requests on time (Mobility Management/Operating)?** [ ] Yes [ ] No [ ]  Upload document to BlackCat complete (last 4 quarters)
3. **Does the subrecipient submit its 5310 Quarterly Service Outcomes and Milestones Report on time (Mobility Management/Operating)?** [ ] Yes [ ] No [ ]  Upload document to BlackCat complete (last 4 quarters)
4. **Does the subrecipient utilize monthly financial reports and/or variance reports to monitor budget adherence? (Mobility Management/Operating)** [ ] Yes [ ] No

## 2.7 | Local Match

The local share must come from non-U.S. DOT sources, except for Federal Lands Highway Program funds. FTA permits the use of the following as local share: cash (or in-kind contribution); non-farebox revenues from transit operations (e.g., advertising and concession revenues); amounts received under a service contract with a state, local or private social service agency or organization; undistributed cash surpluses; replacement or depreciation cash funds; reserves available in cash or new capital; in-kind contributions; revenue bond proceeds (capital only); transportation development (toll) credits; program income generated from an earlier grant; Temporary Assistance for Needy Families (TANF) funds; and other non-DOT federal funds, such as Community Development Block Grant funds, if authorized by the originating program to be used for transportation.

Under Section 5310 non-cash share such as donations, volunteered services or in-kind contributions can be counted toward the local match if the value of each is documented and supported, the non-cash share represents a capital cost which would otherwise be eligible under the program and is included in the net project costs in the project budget. The uploaded documentation should identify the source and cost calculation for any in-kind amounts claimed.

* + - 1. **Explain how the subrecipient ensures sufficient funds are set aside to cover program expenses and local match dollars: (Where does your local match come from?)**

Click or tap here to enter text.

 **2. What are the sources of funds being used to generate the local match? (check all that apply)**

**Statutorily Defined Sources**

[ ]  Undistributed agency cash surplus

[ ]  Replacement or depreciation cash fund or reserve

[ ]  State or local appropriations

[ ]  Dedicated tax revenue

[ ]  Private donations

[ ]  Net income derived from advertising and/or concessions

[ ]  Other: Click or tap here to enter text.

**Other Federal funds that are unrestricted in their use as match:**

[ ]  Funds received pursuant to a service agreement with a state or local social services agency or private social service organization

[ ]  Other: Click or tap here to enter text.

**In-Kind Contributed Services:**

[ ]  In-Kind – Describe: Click or tap here to enter text.

[ ]  Volunteer

**3. How did the subrecipient assign fair market value to the donated or contributed service?**

[ ] N/A **Explain:** Click or tap here to enter text.

**4. Do you receive any payment for transportation from any organizations?** [ ] Yes [ ] No

If yes, are the terms established by Memorandum of Understanding (MOU) or contract? Click or tap here to enter text.
If so, what are the terms (per trip, per mile, etc.)? Click or tap here to enter text.

 If using MOU or a contract, are you using the payments as local share or revenue? Click or tap here to enter text.

## 2.8 | A-133 Audit

**Subrecipients expending $750,000 or more in Federal financial assistance from all federal sources in the subrecipient’s fiscal year must prepare a single audit pursuant to 2 CFR part 200.500 Note the Single Audit threshold increases from $750,000 to $1,000,000 effective for audits with periods beginning on or after October 1, 2024. Fiscal years that encompass an earlier ending date must be audited in accordance with the $750,000 threshold.**

The legally authorized auditing body for all primary recipients is the State Board of Accounts. Primary recipients that contract with non-profit organizations via “pass‐through” arrangements to operate the transit service must require that these organizations provide WisDOT with their own A‐133 audit, if applicable. The grantee is responsible for reviewing all subcontractors’ audit reports and appropriately resolving any findings. The subcontractors’ audits must be available for review by WisDOT, upon request.

Subrecipients are responsible for prompt resolution of all audit findings and recommendations. This responsibility requires that the grantee:

* Promptly evaluate the report; determine the appropriate follow‐up actions and establish a date for their completion and complete all required actions within the established period of time.

Deficiencies or opportunities for improvement identified in an audit must be resolved by the subrecipient. The audit is not resolved until WisDOT concurs in the documentation of steps taken to implement any needed corrective actions. The status of outstanding audit findings and recommendations should be monitored and reported by the grantee in quarterly progress reports and, where appropriate, significant events reported.

Note that all Wisconsin municipalities and counties are required to file an electronic financial report/financial statement with the Wisconsin Department of Revenue (DOR).  Municipalities and counties with a population over 25,000 must also submit an auditor’s opinion of the financial report.  These requirements can be found in State statutes 86.303(5) and 73.10 (plus DOR policies & procedures). There may be other reasons a financial report is completed. For example, a town board may request to have a financial report completed or nonprofit bylaws may require it. If an audit or financial report is completed, requirements in the WisDOT grant agreement allow WisDOT access to the audit/financial report.

1. **Did the subrecipient receive more than $750,000 in Federal funds annually (from all sources) during any one of the last three fiscal years?**[ ] Yes [ ] No

If Yes,” did **the subrecipient** prepare a single audit containing the required Schedule of Expenditures of Federal Awards (SEFA)??

 [ ]  Yes [ ] No [ ]  Upload of single audit complete

 If yes, does the audit contain any findings relative to **the subrecipient**’s use of WisDOT/FTA funds?

 [ ] Yes [ ] No

 If "Yes," has the subrecipient submitted a remedial action plan to WisDOT and/or resolved the findings?

[ ] Yes [ ] No

1. **If transit services are contracted to a private provider, has the contractor prepared an audit and provided a copy to the subrecipient for review?** [ ] Yes [ ] No
2. **If the subrecipient is not subject to a Single Audit, are financial statements prepared and subject to an independent audit by an outside CPA firm?** [ ] Yes [ ] No

# PROCUREMENT Section 3

Subrecipients must comply with all federal, state and local laws, ordinances, regulations and policies regarding procurement and contracting. WisDOT subrecipients must maintain written procurement procedures that reflect applicable State and local laws and regulations, as well as conform to applicable Federal law and the standards identified in 2 CFR § 200 and FTA Circular 4220.1F.

Please note that FTA Circular 4220.1F has not been updated to reflect all current provisions of the Uniform Administrative Requirements (2 CFR § 200). Until an updated circular is issued, when there is a conflict between guidance contained in FTA Circular 4220.1F and the Uniform Administrative Requirements, the Uniform Administrative Requirements supersede Circular 4220.1F. Also, please note that this section only applies to 5310 subrecipients that use their FTA/WisDOT funds to purchase any goods or services with Federal funds.

`

Additional procurement information can be found at <https://wisconsindot.gov/Pages/doing-bus/local-gov/astnce-pgms/transit/procure.aspx>

1. **Does the subrecipient make vehicle purchases exclusively from the State Human Service Vehicle (HSV) Contract list with FTA/State funds?** [ ] Yes [ ] No
2. **Has the subrecipient made purchases other than vehicles or vehicles independent of the HSV with FTA/State funds?**

[ ] Yes [ ] No

If yes, did the subrecipient follow its procurement policy?

[ ] Yes [ ] No

If yes, do your purchasing procedures ensure the most efficient and economic purchase?

[ ] Yes [ ] No

1. **Does the subrecipient maintain a written history of every procurement and retain related documentation for five years after the audit?**

[ ] Yes [ ] No

## 3.1 | Standards of Conduct

The Common Grant Rules found in 49 CFR part 18 and 49 CFR part 19 require each subrecipient to maintain written standards of conduct governing the performance of its employees engaged in the award and administration of contracts.

1. **Does the subrecipient have written procurement policies and procedures (i.e., procurement manual)?**

[ ] Yes [ ] No [ ]  Upload of document complete

1. **Does the subrecipient maintain written standards of conduct governing the performance of its employees that are engaged in the award and administration of contracts? (i.e., no gift policy)**

[ ] Yes [ ] No [ ]  Upload of document complete

If yes, Does the written policy cover officers, agents, or board members, or their immediate family members, partners, or organizations that employ or are about to employ any of the foregoing individuals? [ ] Yes [ ] No

## 3.2 | Pre-Award and Post Delivery Audit

Subrecipients purchasing vehicles through the State Vehicle Contract will be required to submit the post-delivery documentation to WisDOT. Those subrecipients that purchase vehicles independently will be responsible for both the pre‐award and post-delivery review.

<https://wisconsindot.gov/Pages/doing-bus/local-gov/astnce-pgms/transit/procure.aspx>

1. **Are you aware of WisDOT’s pre-award and post -delivery review and certification process?**

[ ] Yes [ ] No

1. **Explain a typical visual vehicle inspection at delivery?** Click or tap here to enter text.

**Who inspects?** Click or tap here to enter text.

**How are Inspections/road tests documented?**

Click or tap here to enter text.

## 3.3 | Purchase of Service Contracts (5310 Operating only)

<https://wisconsindot.gov/Pages/doing-bus/local-gov/astnce-pgms/transit/procure-ifb.aspx>

Subrecipients may purchase service from private sector transportation providers as well as public providers. Under such arrangements, certain special conditions apply to the purchase of service agreement.

The purchase of service contracts must be either a cost reimbursement or fixed price contract. (Limit or term or contract? i.e., 5 years)

* Fixed price contracts should have the cost calculated on a service or route specific basis, either vehicle or passenger miles, or a combination of both. It is not subject to any adjustment based on a contractor's cost experience in performing the contract.
* Cost reimbursement contracts should allow for a periodic evaluation of the fixed rate to accommodate changes in transportation costs. These contracts establish an estimate of total cost for obligating funds and establishing a ceiling that the contractor may not exceed (except at its own risk) without approval.
1. **Has the subrecipient entered into any purchase of service contracts** (provider contracts)**?**

[ ] Yes [ ] No

1. **If yes, what type of contract did the subrecipient use with the service provider?**

[ ]  Fixed price contract

[ ]  Cost reimbursement contract

1. **Did the subrecipient verify and document (print) that the contractor was not on the System for Award Management (SAM) excluded parties list?**

 [ ] Yes [ ] No

# ASSET MANAGEMENT Section 4

All property acquired using Federal funds shall be utilized and disposed of in accordance with the applicable FTA program circular, FTA Circular 5010.1D, Chapter IV, Section 4(n)(4) and 49 CFR part 1201. Title to all property purchased with Federal funds shall be vested in the name of the grantee/subrecipient.

The subrecipient and/or designated operator shall have the requisite fiscal and technical capacity to carry out the project and be responsible for maintaining required insurance coverage, property records, conducting physical inventories, implementing adequate property control systems, and maintaining the equipment in proper working condition. Documentation must be available upon request. Note that information regarding minimum Wisconsin vehicle insurance requirements can be found at <https://wisconsindot.gov/Pages/dmv/com-drv-vehs/mtr-car-trkr/mc-ins.aspx>.

Federally‐funded equipment and facilities must be kept in good operating order. Meal delivery or other incidental services provided by the grantee cannot conflict with the provision of public transit service or result in a reduction of service to transit passengers. If incidental service is provided, then the subrecipient or operator must ensure that it fully recovers the cost of service.

|  |
| --- |
| Does the subrecipient have any vehicles that were funded through the 5310 Grant Program?[ ] Yes [ ] No  If YES, continue to the next question. If NO, skip to Section 7 Civil Rights |

## 4.1 | Continuing Control of Assets (Vehicles)

### Vehicle Maintenance Records

1. **Does the subrecipient maintain an inventory for all equipment acquired with FTA funds?**

 [ ] Yes [ ] No

* Upload of vehicle inventory to BlackCat complete
1. **Does the subrecipient have a written vehicle maintenance plan?**

[ ] Yes [ ] No [ ]  Upload of vehicle maintenance plan to BlackCat complete

Date written or last updated: Click or tap here to enter text.

Maintenance Manager’s Name and Title: Click or tap here to enter text.

<https://wisconsindot.gov/Pages/doing-bus/local-gov/astnce-pgms/transit/compliance/asset.aspx>(maintenance)

If yes, does the plan describe a system of periodic inspections and preventive maintenance to be performed at certain defined intervals? [ ] Yes [ ] No

1. **Is there any incidental use on any of the vehicles, such as meal delivery?**

[ ] Yes [ ] No

If yes, explain how subrecipient ensures that incidental use is within program requirements and no riders are displaced: Click or tap here to enter text.

  If yes, does the subrecipient track and fully recapture all mileage and costs related to the incidental use?

[ ] Yes [ ] No

1. **Are the vehicles leased to another entity?**

[ ] Yes [ ] No (all vehicle leases should be uploaded)

If yes, explain how vehicle condition and maintenance is monitored by your agency (contractor oversight): Click or tap here to enter text.

1. **How does the subrecipient seek warranty claims on vehicle assets?**

Explain: Click or tap here to enter text.

1. **Are there indicators of repetitive occurrences of any problem in any one make/model of vehicles?**

[ ] Yes [ ] No

If yes, has this been reported to WisDOT? [ ] Yes [ ] No

1. **Vehicle Inspection - Use the Inspection form (separate from workbook – attachment original to email)**

Inspect two (2) vehicles using the form that is supplied – complete a form for each vehicle and upload to BlackCat. [ ]  Upload of vehicle inspection complete

### Vehicle Records Review

1. **Provide vehicle preventive maintenance records (oil changes) for three vehicles going back 18-24 months:**
* **Year       VIN**
* **Year       VIN**
* **Year       VIN**  [ ]  Upload of maintenance records complete
1. **Are maintenance records easily retrieved and well-organized?**

[ ] Yes [ ] No

1. **How do you schedule the maintenance of your vehicles?**

[ ]  Mileage [ ]  Time [ ]  Both

1. **What is the established mileage and/or time interval between preventive maintenance events?** Click or tap here to enter text.
2. **Does the subrecipient perform at least 80% of scheduled vehicle maintenance events on time as defined by its vehicle maintenance plan?**

[ ] Yes [ ] No

1. **Does the subrecipient complete pre-trip inspection forms prior to placing a vehicle in service?** [ ] Yes [ ] No

**If Yes, are accessibility features inspected (e.g., wheelchair lifts/ramps)?** [ ] Yes [ ] No

**Are vehicles found to have accessibility or safety-related defects removed from service before the beginning of the vehicle's next service day and does the subrecipient ensure the lift is repaired before the vehicle is returned to service?** [ ] Yes [ ] No

**14. Who inspects vehicles for mechanical issues? Name and title** Click or tap here to enter text.

**How is this monitored?** Click or tap here to enter text.

**15. Does your preventive maintenance program also include specific action to ensure that a vehicle’s accessibility features (i.e., lifts, ramps, tie downs), are maintained in good working order?**

[ ] Yes [ ] No

**16. Does your agency use WisDOT’s disposal process for your 5310 funded vehicles?**

[ ] Yes [ ] No

If no, Explain: Click or tap here to enter text.

*Vehicles must be disposed of through BlackCat – disposal instruction are located under “Resources” here:*

[*https://wisconsindot.gov/Pages/doing-bus/local-gov/astnce-pgms/transit/compliance/asset.aspx*](https://wisconsindot.gov/Pages/doing-bus/local-gov/astnce-pgms/transit/compliance/asset.aspx)

**17. Does the subrecipient have a vehicle replacement schedule?**

[ ] Yes [ ] No [ ]  Upload of document complete

If no, vehicle replacement schedule template can be found under “templates” here: <https://wisconsindot.gov/Pages/doing-bus/local-gov/astnce-pgms/transit/compliance/safety-bus.aspx>

**18. Has the subrecipient suffered any causality loss of project equipment during the last 3 years?**

[ ] Yes [ ] No [ ]  Upload of accident records complete

If yes, was an insurance settlement received? [ ] Yes [ ] No

If yes, was guidance requested from WisDOT on the procedures for re-investment to replace the vehicle? [ ] Yes [ ] No

**19. Is there adequate insurance provided for all FTA funded vehicles?**

[ ] Yes [ ] No [ ]  Upload proof of insurance complete

**20. Are your vehicles self-insured?** [ ] Yes [ ] No

If so, please upload your self-insurance documents used when registering your vehicles with DMV.

**21. Does management periodically review insurance coverage?**

[ ] Yes [ ] No How often?Click or tap here to enter text.

**Vehicle Visual Inspection Form (Note for remote reviews the form should be completed for at least two vehicles and photos provided as evidence that vehicles are properly equipped. If using a contractor for vehicles, have contractor complete these forms.)**

|  |  |  |
| --- | --- | --- |
| **Vehicle Review #:**       | **Reviewed by:**       | **Date:**       |
| **Vehicle Model/Make:**       | **Year:**       | **VIN:**      |
| **Mileage:**       | **License Plate #:**       |
|  |
| 1. **Is the vehicle branded and/or properly marked with the subrecipient name? ☐ Yes ☐ No**

Name:       |
| 1. **Does the vehicle show signs of excessive wear or lack of care? ☐ Yes ☐ No**
 |
| 1. **Is the exterior clean and free of damage and rust? ☐ Yes ☐ No**
 |
| 1. **Are doors, mirror, lights, wipers and horn working in good condition? ☐ Yes ☐ No**
 |
| 1. **Does the emergency door and safety interlock system work? ☐ Yes ☐ No**
 |
| 1. **Does the interlock system prevent vehicle movement when the lift is deployed? ☐ Yes ☐ No**
 |
| 1. **Is the ground free of excessive fluid leakage where vehicles are parked? ☐ Yes ☐ No**
 |
| 1. **Is the interior clean, and is upholstery, floor covering, securement areas and railings in good condition? ☐ Yes ☐ No**
 |
| 1. **Are tires unevenly worn, or show Lincoln’s head on a penny? ☐ Yes ☐ No**
 |
| 1. **Does the vehicle start easily and run smoothly, without excessive exhaust? ☐ Yes ☐ No**
 |
| 1. **Is the lift working properly? ☐ Yes ☐ No ☐ N/A**
 |
| 1. **Is the lift showing signs of needed repair (e.g., inoperable parts, rust, etc.) ? ☐ Yes ☐ No ☐ N/A If yes, describe \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**
 |
| 1. **Is the ramp working properly? ☐ Yes ☐ No ☐ N/A**
 |
| 1. **Is the Ramp showing signs of needed repair (e.g., inoperable parts, rust, etc.)? ☐ Yes ☐ No ☐ N/A If yes, describe \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**
 |
| 1. **Is there debris in the way of the ramp? ☐ Yes ☐ No ☐ N/A**
 |
| 1. **Does the vehicle have a posted Title VI public notice? ☐ Yes ☐ No**
 |
| 1. **Is the vehicle equipped with: fire extinguisher (with a current tag) ☐, 3 reflective triangles or 3 liquid-burning flares ☐, first aid kit ☐, bloodborne pathogen kit ☐, strap cutter ☐.**
 |
| **Comments:**      |
| **Photos taken: ☐ Yes ☐ No** |
|  |

# SERVICE AND OPERATIONS Section 5

The questions in this section relate to the operational efficiencies and effectiveness in the system’s various operational policies. This section addresses organization and staffing, transit operations, scheduling, dispatching, customer service, safety and security, operations planning, marketing, complaint management, and service evaluation.

## 5.1 | Service Records

1. **What method does the subrecipient use to count rides?**

[ ]  actual counts

[ ]  estimated counts

Explain: Click or tap here to enter text.

1. **Do you or your subcontractor and/or lessee have a method for tracking Limited English Proficient (LEP) persons?**

[ ] Yes [ ] No

Describe who keeps the information and the method of tracking LEP:

Click or tap here to enter text.

1. **Is LEP tracking information shared with the WisDOT Transit Title VI plan coordinator?**

[ ] Yes [ ] No

1. **Who is responsible for maintaining service and ridership records?**

Name/Title: Click or tap here to enter text.

1. **Is the schedule/dispatch log compared to passenger and/or operational reports on a regular basis?**

[ ] Yes [ ] No

1. **Do your procedures account for all requests for service, including ride refusals?**

[ ] Yes [ ] No

1. **Does the system have an adequate number of dedicated phone lines for transportation reservations?**

[ ] Yes [ ] No

1. **Does dispatch operate during all hours when vehicles are in revenue service?**

[ ] Yes [ ] No

## 5.2 | Operational Efficiencies, Goals and Data Collection

1. **Does the subrecipient use data collected to monitor operations and to develop efficiencies in providing transit services?** [ ] Yes [ ] No
2. **What is the maximum number of vehicles used at one time and how many spare vehicles result from this service level?**       **Maximum Vehicles**       **Spare Vehicles**
3. **Has the organization set any operational or financial performance goals?** [ ] Yes [ ] No

## 5.3 | Operational Employees

1. **Who is responsible for the day-to-day supervision of transportation operations?** Click or tap here to enter text.
2. **Based on education, training, and/or experience, is this person qualified for the responsibility?** [ ] Yes [ ] No
3. **Does the subrecipient have a defined employee/volunteer training program?**

[ ] Yes [ ] No [ ]  Upload of document complete

1. **Are there sufficient staff resources to safely and efficiently operate transit services?**

[ ] Yes [ ] No

1. **Does the subrecipient maintain current training records on all employees?**

[ ] Yes [ ] No [ ]  Upload one sample of training record keeping document complete

1. **Does the training include the following? Check all that apply:**

|  |  |  |  |
| --- | --- | --- | --- |
| [ ]  defensive driving | [ ]  passenger assistance | [ ]  ADA requirements | [ ]  passenger relations |
| [ ]  evacuation and emergency procedures | [ ]  behind the wheel orientation[ ]  Title VI | [ ]  drug and alcohol program and policy prevention  | [ ]  customer service |
| [ ]  other: Click or tap here to enter text. |

1. **Does the subrecipient have a written job description for every employee and volunteer position?**

[ ] Yes [ ] No [ ]  Upload of job description(s) to BlackCat complete

1. **What is the extent of driver training prior to being permitted to drive independently?**

Training Component       (hours)

Classroom Training       (hours)

Behind the Wheel Training       (hours)

1. **Does the subrecipient retain a record of who attended the training including names, sign-in sheets, and the content of the training including a list of any videos shown?** [ ] Yes [ ] No
2. **Do your agency or contracted service have a written service policy or operators’ manual?**

[ ] Yes [ ] No [ ]  Upload of document complete

# Charter Bus and School Bus Section 6

**Charter Services**

WisDOT subrecipients are prohibited from using FTA-funded equipment and facilities to provide charter service that unfairly competes with private charter operators. WisDOT subrecipients may operate charter only when the service meets a specified exception (see 49 CFR § 604.2).

* "Transportation provided by a recipient at the request of a third party for the exclusive use of a bus or van for a negotiated price. The following features may be characteristic of charter service:
	1. Third party pays the transit provider a negotiated price for the group;
	2. Any fares charged to individual members of the group are collected by a third party;
	3. The service is not part of the transit provider’s regularly scheduled service or is offered for a limited period; or (d) A third party determines the origin and destination of the trip as well as scheduling; or
* Transportation provided by a recipient to the public for events or functions that occur on an irregular basis or for a limited duration and:
	1. A premium fare is charged that is greater than the usual or customary fixed route fare; or
	2. The service is paid for in whole or in part by a third party.

**Vehicles purchased with 5310 funding must ensure that appropriate protocols are met before they begin charter services. Subrecipients should notify their program manager in advance of engaging in charter service to ensure the appropriate actions are taken.**

**Exclusive School Bus Services**

WisDOT subrecipients are prohibited from providing exclusive school bus service in competition with private school bus operators unless the service qualifies and is approved by the FTA Administrator under an allowable exemption as defined in 49 CFR Part 605.11.

## 6.1 | Charter Bus

1. **Does the subrecipient use federally funded equipment, or operating funds to support charter operations, defined as:**
* Transportation provided at the request of a third-party for the exclusive use of a bus or van for a negotiated price? [ ] Yes [ ] No Name of the Third-Party(is):
* Transportation provided on an irregular basis or limited duration with a premium fare or paid for by a third party? [ ] Yes [ ] No Name of the Third-Party(ies):
1. **If yes to either question above, describe the service arrangement including passengers, frequency, fees and trip purpose for any charter bus service:** Click or tap here to enter text.
2. **Does the service fall into one of the limited exceptions under which subrecipients may provide community-based charter services** **(see 49 CFR § 604.2)?**
* Transportation of transit employees, contractors, and government officials for the purpose of conducting oversight functions (80-hour maximum)
* Service provided by private charter operators that receive FTA financial assistance
* Transportation for emergency preparedness planning and operation
* Transportation for FTA program purposes under Sections 5310, 5311, 5316, or 5317
* Transportation in response to a formally declared emergency
* Service provided by subrecipients in non-urbanized areas to and/or from transit training outside their geographic service area
1. **If the subrecipient provides charter service under one of the exceptions, has it filed the requisite reports with WisDOT?** [ ] Yes [ ] No

## 6.2 | School Bus

1. **Does the subrecipient and/or its transit system have an agreement with local schools for transportation services?**

[ ] Yes [ ] No

1. **Does the subrecipient use federally funded equipment or operating funds to offer exclusive** **school bus services to students? Are vehicles specifically used to transport students only to and from school and not open to the general public?**

[ ] Yes [ ] No

If yes, does the agreement satisfy any of the three exemptions below?

* + The grantee operates a school system in the area and operates a separate and exclusive school bus service for that school system. [ ] Yes [ ] No
	+ Existing private school bus operators are unable to provide adequate, safe transportation. [ ] Yes [ ] No
	+ The grantee, a public entity, has operated the service prior to August 12th, 1973 or has received a grant for facilities before November 26th, 1974 [ ] Yes [ ] No

# Civil Rights Section 7

Federal civil rights requirements are encompassed in laws, regulations, and Executive Orders. The

objective of FTA's oversight in this area is to:

* Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin;
* Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low‐income populations;
* Promote the full and fair participation of all affected populations in transportation decision making;
* Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low‐income populations; and
* Ensure meaningful access to programs and activities by persons with Limited English Proficiency.

## 7.1 | Title VI

Title VI is a federal statute and provides that no person in the United States, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

Any programs or activities that receive federal transit funding must comply with Title VI. Any agency receiving federal dollars either directly from FTA, indirectly through WisDOT or both, must:

* Promote full and fair participation in transportation decision-making without regard to race, color or national origin
* Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency
* Ensure the level and quality of transportation service is provided in a nondiscriminatory manner
* Prepare and submit a Transit Title VI Plan to WisDOT

Additionally, the subrecipient must ensure that all transit services and related benefits are distributed equitably.

Information on Title VI requirements is available on the WisDOT website:

## <https://wisconsindot.gov/Pages/doing-bus/local-gov/astnce-pgms/transit/compliance/title6.aspx>

## *Note: WisDOT has developed a Title VI program template as a resource for subrecipients.*

## Questions in this section are designed to ensure that subrecipients are compliant with ~~new~~ FTA Title VI regulations.

|  |  |  |
| --- | --- | --- |
|  | **Does the subrecipient have a Title VI Plan?*** What is the date of the Title VI Plan?

**If yes,*** Has the Title VI Plan been submitted to the WisDOT for review and approval?
* Has it been adopted by the subrecipient's governing body?
 | **☐ Yes ☐ No** |
| **☐ Yes ☐ No****☐ Yes ☐ No** |
|  | **Does the Title VI Plan include:** |  |
|  | * **Policy Approval** by local governing board/highest ranking official
 | **☐ Yes ☐ No** |
|  | * **Notice of Nondiscrimination**

**If yes,** * Is the **Notice of Nondiscrimination** placed where affected employees and the public may view it?
	+ Front desk
	+ Vehicles
	+ Website

Does the **Notice of Nondiscrimination** include: * A statement that the agency operates programs without regard to race, color, and national origin.
* A description of the procedures that members of the public should follow to request additional information on the subrecipient’s nondiscrimination obligations.
* Instructions for individuals that are deaf, hard of hearing, or have a speech disability on how to use telecommunications services [WI Relay 7-1-1](https://wisconsinrelay.com/).
	+ Sample language: “for hearing impaired, please use [Wisconsin Relay 711](https://wisconsinrelay.com/)
 | **☐ Yes ☐ No****☐ Yes ☐ No****☐ Yes ☐ No****☐ Yes ☐ No****☐ Yes ☐ No****☐ Yes ☐ No****☐ Yes ☐ No** |
|  | * **Complaint Procedure**
 | **☐ Yes ☐ No** |
|  | * **Complaint Form**
 | **☐ Yes ☐ No** |
|  | * **Complaint Log (required to be maintained annually)**
	+ Have there been any complaints or lawsuits alleging discrimination based on disability?
	+ If yes, what is the status or resolution of these complaints or lawsuits? Describe**:**
	+ If yes, has WisDOT been notified of the complaints or lawsuits?
 | **☐ Yes ☐ No****☐ Yes ☐ No****☐ Yes ☐ No****☐ Yes ☐ No** |
|  | * **Public Participation Plan**
 | **☐ Yes ☐ No** |
|  | * **Limited English Proficient (LEP) Plan/Language Assistance Plan**
 | **☐ Yes ☐ No** |
|  | * **Diversity Representation Information on non-elected transit boards/advisories/councils**
 | **☐ Yes ☐ No** |
|  | **Limited English Proficiency** * Has the subrecipient translated the followingvital documents into languages other than English consistent with the subrecipient’s Limited English Proficiency (LEP) Plan, if applicable?
	+ Notice of Nondiscrimination
	+ Complaint Procedure
	+ Complaint Form
* Has the subrecipient integrated into its established Public Participation and Outreach Processes procedures that ensure involvement and participation by minority and LEP populations?
	+ If “Yes,” describe these activities. \_\_\_\_\_\_\_
* Describe the subrecipient's language assistance efforts to provide access to information and services by LEP persons. \_\_\_\_\_\_\_\_\_\_\_\_\_
 | **☐ Yes ☐ No****☐ Yes ☐ No****☐ Yes ☐ No****☐ Yes ☐ No** |
|  | **Are employees informed and/or trained on Title VI and LEP requirements?**Comments:       | **☐ Yes ☐ No** |
|  | **If the subrecipient operates a small, fixed route transit system, does the Title VI Plan include:*** Fixed Route Service Standards
* Fixed Route Service Policy
 | **☐ Yes ☐ No****☐ Yes ☐ No** |

## 7.2 | Equal Employment Opportunity (EEO)

WisDOT must ensure that their subrecipients do not discriminate against any employees or applicants for employment because of race, color, religion, national origin, sex or age. In addition, recipients and subrecipients must take affirmative actions to employ minorities and women.

Private transportation providers under contract with subrecipients are also required to comply with these EEO regulations.

An EEO program is required of all subrecipients that both:

* Employ 100 or more transit-related employees (including temporary, full, and part-time), and
* Received capital or operating assistance in excess of $1 million or planning assistance in excess of $250,000 in the previous federal fiscal year.

Agencies between 50-99 transit-related employees are required to prepare and maintain an EEO program that includes a statement of policy, a dissemination plan, a designation of personnel, an assessment of employment practices, and a monitoring and reporting system. These smaller agencies are not required to conduct a utilization analysis with goals and timetables or to submit the EEO Program to FTA every four years. Instead, these agencies are required to provide the EEO program to FTA, if requested.

|  |  |  |
| --- | --- | --- |
| 1.
 | **Does the subrecipient receive federal operating or capital funds in excess of $1 million or planning assistance funds in excess of $250,000 and employ 100 or more transit-related employees?** *\*If yes to both, the subrecipient should have an EEO program. Please contact WisDOT for further information.* | **☐ Yes ☐ No** |
|  | **Does the subrecipient have any contractors who meet the requirements?** | **☐ Yes ☐ No** |
| * If yes, has the subrecipient obtained the EEO program from the contractor?
 |  |
|  | **Who is responsible for ensuring that EEO obligations are fulfilled on behalf of the subrecipient?** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |  |
|  | **Has the subrecipient posted an EEO statement in a conspicuous and accessible place in the workplace?** [**https://www.eeoc.gov/eeo-policy-statement**](https://www.eeoc.gov/eeo-policy-statement) | **☐ Yes ☐ No** |
|  | **Is the subrecipient's EEO policy included in personnel policies and/or employee handbook?** | **☐ Yes ☐ No** |
|  | **Are EEO statements included on the subrecipient’s job applications and employment notices/job postings?** | **☐ Yes ☐ No** |
|  | **How does the subrecipient ensure non-discrimination for ADA-eligible persons in terms of employment? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** |  |
|  | **Were reasonable accommodations made for hiring a person with disabilities in accordance with Title I of the ADA?** | **☐ Yes ☐ No** |
|  | * If Yes, describe the accommodation. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
 |  |
|  | **Were any EEO complaints or lawsuits received in the past three years?** | **☐ Yes ☐ No** |
| * If "Yes," describe the nature of the complaint or lawsuit. \_\_\_\_\_\_\_
 |  |
| * Did the subrecipient report the complaint or lawsuit to WisDOT?
 | **☐ Yes ☐ No** |

## 7.3 | Disadvantaged Business Enterprises (DBE)

WisDOT is committed to a civil rights program that includes the participation of Disadvantaged Business Enterprises (DBEs) in WisDOT contracting opportunities. WisDOT's has established a DBE program in accordance with U.S. DOT regulations 49 CFR part 26.

Subrecipients receiving planning, capital, and/or operating assistance who will award prime contracts (excluding transit

vehicle purchases) exceeding $250,000 in FTA funds in a federal fiscal year must submit a DBE program.

Subrecipients do not need their own, independent DBE programs or overall goals, since the primary recipient's DBE

program and overall goals cover the FTA-assisted contracting activities of the subrecipients. WisDOT has assumed

responsibility for subrecipient procurement activity in establishing its own DBE goals; therefore, subrecipients need not

submit their own DBE program to WisDOT.

If the subrecipient does not meet the DBE threshold, other requirements still apply, such as the submission of periodic reports to WisDOT.

|  |  |  |
| --- | --- | --- |
|  | **Does the subrecipient know the WisDOT Transit Section has a DBE goal of 1.61% and how it may or may not apply to the transportation program and services?** | **☐ Yes ☐ No** |
|  | **Did the subrecipient exclude any person from participation in, deny any person the benefits of, or otherwise discriminate against anyone in connection with the award and performance of any contract covered by this part on the basis of race, color, sex, or national origin?** | **☐ Yes ☐ No** |
|  | **On federally funded contracts and subcontracts, does the subrecipient include the required contract language defined in 49 CFR part 26.13(b) as directed by WisDOT?** | **☐ Yes ☐ No** |
|  | **On federally funded contracts, does the subrecipient have a subcontractor(s)?** | **☐ Yes ☐ No** |
| * Are payment logs maintained for contracts with subcontractors?
* If “yes,” explain how the subrecipient monitors the subcontractor(s)?
 | **☐ Yes ☐ No** |
| 5. | **If the subrecipient utilizes a DBE:*** Has the subrecipient properly counted and reported the expenditure to WisDOT?
* How does the subrecipient ensure that the DBE hired is certified to do the work? **\_\_\_\_\_\_\_\_\_\_\_\_**
 | **☐ Yes ☐ No** |
|  | **Has the subrecipient purchased any vehicles using local procurement procedures that have not been part of the state contract?** | **☐ Yes ☐ No** |
| * If “yes,” does the subrecipient include the requisite contract language defined in 49 CFR part 26.13(b)?
 | **☐ Yes ☐ No** |
| * If “yes,” did the subrecipient include the TVM certificate in the procurement?
 | **☐ Yes ☐ No** |
|  | * If “yes”, did the subrecipient verify that the vehicle manufacturer has made the requisite TVM certification to FTA regarding DBE commitment?
 | **☐ Yes ☐ No** |

# Americans with Disabilities Act (ADA) Section 8

Under the Federal Department of Transportation (DOT) Americans with Disabilities Act of 1990 (ADA) regulations, public and private transportation providers are required to operate services in a way that does not discriminate against persons with disabilities. The regulations include general nondiscrimination provisions that apply to all types of agencies and services. This civil rights law sets forth specific requirements for public transportation services, vehicle and facility accessibility, and the provision of complementary paratransit service, as well as overall requirements for a complaint process, codified by U.S. DOT in 49 CFR Part 37.

Federal DOT ADA regulations (49 CFR 37.161-167) detail specific general service requirements that apply across modes. WisDOT must monitor subrecipients for compliance with applicable ADA service provision and training requirements. All public and private transportation providers must:

* Allow service animals to accompany individuals with disabilities in vehicles and facilities
* Deploy the lift or ramp upon request, for standees as well as wheelchair-users
* Accommodate people who use a wide variety of mobility devices
* Not deny an individual transportation because a vehicle’s securement system is unable to secure the mobility device
* Make public information and communications available in accessible formats
* Accommodate persons using respirators or portable oxygen
* Train operators in the use of accessibility equipment as well as sensitivity to people with disabilities

ADA compliance responsibilities will also vary depending on the type of transportation service provided by the subrecipient.

## 8.1| Nondiscrimination

1. **Does the subrecipient provide information to the public regarding the availability of accessible services?**

[ ] Yes [ ] No How is the information provided: Click or tap here to enter text.

1. **Is the subrecipient’s staff knowledgeable regarding ADA service requirements appropriate to the specific services offered by the subrecipient to the public?** [ ] Yes [ ] No
2. **Have the vehicle operators and other relevant staff been trained to interact with individuals with disabilities?**

[ ] Yes [ ] No If yes, title of training Click or tap here to enter text.

1. **Do you have a mechanism to capture, investigate and track ADA complaints?**

[ ]  Yes [ ]  No

1. **Have there been any complaints or lawsuits alleging discrimination based on disability?**

[ ] Yes [ ] No

If yes, what is the status or resolution of these complaints or lawsuits?

Describe: Click or tap here to enter text.

 If yes, has WisDOT been notified of the complaints or lawsuits?

 [ ] Yes [ ] No

1. **Does your agency provide specific fare schedule for riders with disabilities?**

[ ] Yes [ ] No

Describe: Click or tap here to enter text.

1. **Have you encountered any circumstances where your insurance provider would not cover a potential rider?**

[ ] Yes [ ] No

If yes, how did you address this issue?

Describe: Click or tap here to enter text.

1. **Does the subrecipient require the driver to assist passengers with disabilities, if they need assistance, to board and de-board the vehicle?** [ ] Yes [ ] No
2. **Does the subrecipient allow service animals to travel with persons with disabilities?**

[ ] Yes [ ] No [ ]  Upload of service animal policy complete

1. **Do the subrecipient’s policies ensure adequate time for boarding and de-boarding for persons with disabilities?**

[ ] Yes [ ] No

1. **Does the subrecipient require individuals with disabilities to use designated priority seats?**

[ ] Yes [ ] No

1. **Does the subrecipient have a policy for dealing with individuals who engage in violent, seriously disruptive or illegal conduct?**

[ ] Yes [ ] No [ ]  Upload of document complete

If yes, are supervisors, dispatchers, and vehicle operators trained on this policy?

[ ] Yes [ ] No

1. **Is there an appropriate appeal process for any service refusals?**

[ ] Yes [ ] No

Where can this be found: Click or tap here to enter text.

## 8.2 Vehicles – General

1. **Does the subrecipients pre-trip checklist include cycling the lift to ensure that it is in working order and checking for the presence and condition of the tie-downs in the securement area?**

[ ] Yes [ ] No [ ]  Upload 1 sample of pre-trip/post trip form complete

1. **Does the subrecipient require use of securements?** [ ] Yes [ ] No

If yes, does the subrecipient have a written policy requiring use of securements/seatbelts?

[ ] Yes [ ] No [ ]  Upload of document complete

1. **Does the subrecipient allow the lift to be used by standees to board/de-board the vehicle?**

[ ] Yes [ ] No

1. **Are there any restrictions on the type of mobility devices allowed on the vehicles?**

[ ] Yes [ ] No

Describe: Click or tap here to enter text.

1. **How do you respond to vehicle mechanical issues (failures) to the lift or ramp while the vehicle is in service?**

Describe: Click or tap here to enter text.

1. **What is the response time to providing service when a vehicle mechanical issue is found?** Click or tap here to enter text.
2. **How many days, on average, is the vehicle out of service?** Click or tap here to enter text.
3. **Are there other accessible vehicles to fill in when a vehicle is out of service?**

[ ] Yes [ ] No

1. **Does the subrecipient allow Personal Care Attendants (PCA) to travel with persons with disabilities and at no cost?** [ ] Yes [ ] No
2. **Does the subrecipient allow persons with disabilities using respirators or portable oxygen?**

[ ] Yes [ ] No

1. **Who can accompany ADA paratransit eligible passengers?** Click or tap here to enter text.
2. **Are fares charged to accompany individuals?** [ ] Yes [ ] No
3. **Does the subrecipient have any non-accessible vehicles in your fleet?**

[ ] Yes [ ] No

1. **In those situations where only non-accessible vehicles are available, how do you ensure that the needs of non-ambulatory persons are met?**

**Describe:** Click or tap here to enter text.

## 8.3 Demand-Response Services: Equivalent Service Standards

For an agency to purchase a non-accessible vehicle with 5310 funding the agency must determine that the services they will be providing after the purchase of the non-accessible vehicles is equivalent to the current ADA accessible service.

1. **Does your agency vehicle inventory include non-accessible vehicles?**

[ ] Yes [ ] No

1. **Is the demand response service provided for persons with disabilities equivalent to the service provided other individuals with respect to the following service characteristics?**
* **Response time** [ ] Yes [ ] No
* **Fares** [ ] Yes [ ] No
* **Geographic area of service** [ ] Yes [ ] No
* **Hours and days of service** [ ] Yes [ ] No
* **Availability of information** [ ] Yes [ ] No
* **Reservations capability** [ ] Yes [ ] No
* **Constraints on capacity or service availability** [ ] Yes [ ] No
* **Restrictions/priorities based on trip purpose** [ ] Yes [ ] No
1. **What is the makeup of your fleet regarding accessibility? (number of vehicles, vehicle type, number of wheelchair spaces and ambulatory spaces per vehicle.**

Describe: Click or tap here to enter text.

1. **Are trip denials documented?**

*Trip denial definition: A rider requests a trip and the transit agency can only offer a trip that is outside the one-hour negotiating window (before or after the individual's desired departure time). This represents a denial regardless of whether the rider accepts such an offer.*

[ ] Yes [ ] No

If yes, is the FTA definition of a trip denial used to document the denials? [ ] Yes [ ] No

1. **Does the service operate without a substantial number of trip denials?** [ ] Yes [ ] No

**Number of denials in last year:** Click or tap here to enter text.

1. **Are the reasons for trip denials documented?** [ ] Yes [ ] No
2. **Is it documented whether the trip request was made by a person with disabilities?**

[ ] Yes [ ] No

1. **Do the reasons for trip denials include equipment?** [ ] Yes [ ] No
2. **If the subrecipient provides demand response service and has a process to suspend riders who establish a pattern or practice of missing scheduled trips (i.e., a “no-show” policy), does the subrecipient, as a best practice, follow guidelines in the administration of this policy similar to those for complementary paratransit?**

[ ] Does the standard for establishing a pattern or practice of missed trips consider the frequency of rides and no‐shows (as opposed to a simple number threshold)?

[ ] Are suspensions for a reasonable period of time? A reasonable suspension for the first instance of a pattern or practice of no-shows might be a few days to a week, while subsequent offenses may justify longer suspensions. FTA generally considers suspensions longer than 30 days to be excessive.

*The requirements for “no-show” suspension of service are associated with complementary paratransit and can be found at 49 CFR 37.125(h); It should be noted that many organizations providing demand response only also maintain no-show policies.*

##  8.4 | Reasonable Modification

Transit agencies are required to make reasonable modifications to policies, practices, and procedures to avoid discrimination and ensure that their programs are accessible to individuals with disabilities. Reasonable modification applies to an agency’s policies/practices, not the regulatory requirements.

1. **Does the subrecipient have a written reasonable modification policy?**

[ ]  Yes [ ]  No

1. **Is the subrecipient’s process for making reasonable modification requests readily available to the public and in an accessible format?** [ ]  Yes [ ]  No

If “yes,”how is this information communicated to the public? Click or tap here to enter text.

1. **Has the subrecipient designated an individual/job position to handle reasonable modification requests?** [ ]  Yes [ ]  No

If “Yes,” is the individual’s contact information contained on the transit system’s website or otherwise sufficiently promoted to the public?

1. **Does the request process for reasonable modification require advanced notice?** [ ]  Yes [ ]  No

If “Yes,” is there adequate flexibility to accommodate request that would reasonably occur spontaneously?

[ ]  Yes [ ]  No

1. **Does the request process require the use of the term “reasonable modification” by the requestor?**

 [ ]  Yes [ ]  No

1. **Does the subrecipient sufficiently advertise the process for filing an FTA complaint?**  [ ]  Yes [ ]  No

If “yes,” describe the advertising methods**.** Click or tap here to enter text.

# Safety and Drug and Alcohol Section 9

## 9.1| Nondiscrimination System Safety and Security Policy and Procedures

The April 2003 Model Bus Safety and Security Program Memorandum of Understanding (developed under a joint effort by FTA, AASHTO, APTA, and CTAA) recommended the following core elements for all community transportation providers.

Core safety program elements include:

Security Driver/Employee Selection

Driver/Employee Training Vehicle Maintenance

Drug and Alcohol Abuse Programs Safety Data Acquisition and Analysis

|  |  |  |
| --- | --- | --- |
|  | **Does the subrecipient have a written safety policy statement?** | **☐ Yes ☐ No** |
|  | **Does the subrecipient have a written safety plan?** | **☐ Yes ☐ No** |
|  | **Have safety goals been defined?** | **☐ Yes ☐ No** |
|  | **Does the subrecipient have a safety/security officer designated?** | **☐ Yes ☐ No** |
| * Name of person and title:
* Describe qualifications and/or training:
 |  |
|  | **Have safety roles and responsibilities been defined for all positions?** | **☐ Yes ☐ No** |
|  | **How are safety hazards identified and risks assessed?**Describe:       |  |
|  | **Has the subrecipient had an accident or incident requiring one or more of the following within the past year?** |  |
| Vehicle crash requiring the vehicle to be towed from the scene? | **☐ Yes ☐ No** |
| Vehicle crash causing driver or passenger injuries, which required medical assistance? | **☐ Yes ☐ No** |
| * If “yes,” to either above, was the driver determined to be at fault?
 | **☐ Yes ☐ No** |
| Was a citation issued to the driver? | **☐ Yes ☐ No** |
| Were there any moving violations issued to drivers while driving subrecipient equipment, or in the course of subrecipient duties? Explain:       | **☐ Yes ☐ No** |
| Were there any passenger or employee incidents (slip, trip, fall) requiring medical assistance? Explain:       | **☐ Yes ☐ No** |
|  | **Are accidents reported to WisDOT as required?** | **☐ Yes ☐ No** |
|  | **Does the subrecipient have safety training requirements?** | **☐ Yes ☐ No** |
|  | **How is the importance of safety communicated to staff?** Explain:       |

## 9.2 | Drug and Alcohol

Subrecipients that receive only Section 5310 program assistance **must comply with the Federal Motor Carrier Safety Administration (FMCSA) rule for all employees who hold commercial driver’s licenses (49 CFR part 382).**

1. **Does the subrecipient operate vehicles that require the driver to hold a Commercial Driver’s License?**

[ ] Yes [ ] No

1. **Does the subrecipient and/or its service provider have a policy that it disseminates to its employees that meets the requirements of 49 CFR part 382?** [ ] Yes [ ] No

Additional drug and alcohol question may apply if your agency is a Section 5310 recipient that receives funding under one of the covered FTA programs (Section 5307, 5309, or 5311). These FTA funded programs should include any employees funded under Section 5310 projects in their testing program who conduct safety-sensitive functions as defined by 49 CFR Part 655.

# Miscellaneous Provisions Section 10

## 10.1 | Transportation Coordination

Federal transit law, as amended by SAFETEA–LU (2005) and continued in MAP-21 (2012), requires that projects selected for funding under the Section 5310, be “derived from a locally developed, coordinated public transit-human services transportation plan”. Transportation coordination will: Develop and improve transportation options; improve access; minimize service duplication and facilitate appropriate cost-effective transportation with available resources.

In response to this requirement, WisDOT collaborated with Regional Planning Commission (RPC) planners to develop a coordination planning process and toolkit. <http://www.dot.wisconsin.gov/localgov/coordination/index.htm>

1. **Regardless of funding source, does the subrecipient coordinate with others to reduce operating costs, reduce duplication of services and gain service contracts financed with state and federal funds or to serve more people?** [ ] Yes [ ] No

Explain further: Click or tap here to enter text.

1. **Is the subrecipient familiar with the Transportation Coordination requirement for 5310 subrecipients?**

[ ] Yes [ ] No <http://www.dot.wisconsin.gov/localgov/coordination/plans.htm>

1. **Has the subrecipient participated in developing a local or regional human service/transportation coordinated plan?** [ ] Yes [ ] No

If Yes, does the subrecipient’s project fall under one or more of the goals included in the coordinated plan?

[ ] Yes [ ] No

1. **Are the subrecipient’s board members (or equivalent) knowledgeable of the adopted Coordinated Plan?**

[ ] Yes [ ] No

1. **Does the subrecipient’s board (or equivalent) use the Coordinated Plan’s priorities to evaluate current transit performance and to plan for new services?** [ ] Yes [ ] No
2. **Is the agency a member of a local Transportation Advisory Committee (TAC) or equivalent in your area?**

[ ] Yes [ ] No

1. **Did the subrecipient notify other transportation providers prior to submitting application?**

[ ] Yes [ ] No

## 10.2 | Training

FTA requires states to inform subrecipients of applicable federal requirements and provide technical assistance in meeting those requirements. Several FTA topic areas (including ADA and Drug & Alcohol) have specific requirements for subrecipients to train their own staff.

1. Do you access the training offered through the Wisconsin Rural Transportation Assistance Program (Wisconsin RTAP)? [ ] Yes [ ] No
2. **What training is provided to staff?**

[ ]  Drug and Alcohol

[ ]  Safety

[ ]  ADA

[ ]  Passenger Assistance

[ ]  Title VI/LEP

[ ]  Other: Click or tap here to enter text.

Explain these trainings in detail: Click or tap here to enter text.

1. **What training is provided to and or required by your third-party contractor or lessee to ensure compliance with FTA requirements?**

[ ]  Drug and Alcohol

[ ]  ADA

[ ]  Passenger Assistance

[ ]  Title VI/LEP

[ ]  Safety

[ ]  Other: Click or tap here to enter text.

Explain how this training is implemented: Click or tap here to enter text.

|  |
| --- |
| **When the workbook is complete.** Please **UPLOAD** the completed workbook along with supporting documents to WisDOT’s Grants Management System under the “Resources” tab. (click on the 2024-2025 Compliance Review folder. You can upload files by clicking on the “Add” button).**Send an email to** **cglover@rlsandassoc.com** **when this step is complete.**  |

# Survey

**If you have time, please answer the survey questions below?**

1. **Was the format of this workbook easy to follow?** [ ] Yes [ ] No

**Comments:**

1. **Did the explanation of each section of the workbook provide you with an understanding of that section?**

[ ] Yes [ ] No **Comments:**

1. **Were the questions easy to understand?** [ ] Yes [ ] No

**Comments:**       \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. **Was the format of this workbook easy to fill in and answer the questions?** [ ] Yes [ ] No

**Comments:**       \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. **Was the WisDOT Staff member and/or Consultant available to answer your questions?** [ ] Yes [ ] No

**Comments:**       \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. **Question or comments you may have on the WisDOT Compliance Desktop Review?**       \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_