MONTANA DEPARTMENT OF TRANSPORTATION

SECTION 5311
COMPLIANCE AND GOOD PRACTICES REVIEW

Subrecipient: _____

Reviewer(s): _____

Desk Review Date: _____

Site Visit Date: _____

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PURPOSE AND DIRECTIONS

The Montana Department of Transportation (MDT) conducts compliance and good practices reviews of Section 5311 subrecipients to ensure that they meet the conditions of receipt of Federal Transit Administration (FTA) assistance, promote good management practices, and identify training and technical assistance needs.

MDT conducts the reviews as follows:

1. MDT reviews materials and reports on file in its office and completes several sections of the review package. MDT notes findings, agreed upon corrective actions, and recommendations from the last review. MDT emails the partially completed package to the subrecipient.

2. The subrecipient reviews the information entered by MDT, updates the material listed, and answers as many questions as possible. After completing the review package, the subrecipient emails it to MDT.

3. MDT reviews the subrecipient's responses and follows up on the responses during the site visit, which lasts no more than one day. The site visit presents an opportunity for MDT to observe your service and operations first-hand and provides you with an opportunity to have any questions that you may have answered. During the site visit, MDT follows up on corrective actions taken for findings from the last review.

Please email the completed questionnaire to Tom Stuber at tstuber@mt.gov.

Thank you for your cooperation and we look forward to a productive site visit.

<div align="right">MDT</div>

ATTENDANCE SHEET

Name	Title	Phone	Email

ADMINISTRATION AND MANAGEMENT

LEGAL AND GOVERNANCE

Subrecipients must have the legal capacity to receive federal and State grants. They must have a designated body legally responsible for the overall organization, management, and operation of the transportation system. The governing body should be both representative of the community to provide management with community advice and bring management and other expertise from which transit management can draw. It should meet regularly, conduct business in an open and transparent manner, set policy and goals and objectives for the system, and not involve itself in day-to-day operations.

Subrecipients must disclose use of local funds for federal lobbying activities, pending litigation where the State or federal government is named or FTA-funded assets could be affected, and instances of false claims or fraudulent activity.

1. What is the name of the designated body legally responsible for the overall organization, management, and operation of the transit system? If you are part of a tribe, city, or county, please skip to question 19.	
2. Do the articles of incorporation specifically mention public transportation, coordination of transportation or other passenger transportation functions? *Good practice*	
3. Does the governing body have written bylaws for its governance which include:	
a. Duties and responsibilities	
b. Method of member selection	
c. Terms of office	
d. Frequency and notification of meetings	
e. Remote attendance (video, phone)	
f. Procedure for hiring manager	
g. Avoiding conflict of interest in: i) Selection of governing body members	
ii) Purchasing and doing business with service	
iii) Employment	

4. What is the size of the governing body? Are there any vacancies? If yes, how long have the positions been vacant?	
5. How are members selected for the governing body?	
6. Is the governing body representative of the communities it serves? *Good practice*	
a) # Members total	
b) # Members: Private sector	
c) # Members : Public sector	
d) # Members: Elected officials	
e) # Members: Consumers	
f) # Members: Minorities	
g) # Members: Male	
h) # Members: Female	
i) # Members: Disabled	
j) # Members by key geographic areas or political subdivisions	
7. What key skills or knowledge do governing body members bring that can be leveraged by transit management (finance, legal, management, human services) at no cost to the agency? *Good practice*	
8. Are governing body members given orientation and ongoing information? How is this accomplished? *Good practice*	
9. Are governing body members provided a handbook or policy manual? If yes, what does it contain? *Good practice*	
10. Are governing body members provided an agency email address with which to conduct agency business and receive agency communications? *Good practice*	

11. Are governing body members encouraged to ride the service? *Good practice*	
12. Does a majority of governing body members regularly attend meetings? *Good practice*	
13. Does the sample of governing body records indicate that minutes are adopted at the next meeting? *Required*	
14. Are financial reports submitted to the board for its review and action? How often? *Good practice*	
15. Are periodic reports provided to funders providing information on cost, revenue, service and ridership? *Good practice*	
16. How is program policy determined?	
17. Does the governing body involve itself in day-to-day operations? *The governing body should not involve itself in day-to-day operations*.	
18. Does the governing body formally review the performance of the chief executive officer, manager, or executive director at least annually? *Good practice*	
19. Does the transit agency maintain a narrative history of the organization or a list of key milestones? *Good practice*	
20. If you are a private non-profit agency that administers several programs or part of a city or county, is there a transit committee to advise the governing body on transit policy? *Good practice*	
21. Are FTA funds used for lobbying for federal funds? *The use of federal funds for lobbying is prohibited.*	

22. Have you used nonfederal funds for lobbying? If yes, have you filed with the Division the Standard Form-LLL, "Disclosure Form to Report Lobbying" and any necessary updates? *If lobbying services are procured with non-federal funds, the subrecipient is required to submit the disclosure form, OMB Standard Form LLL (Rev.7-97) to MDT for filing with FTA.*	
23. Is there any pending litigation (disputes, breaches, defaults or other litigation) where the State or Federal government is named or FTA-funded assets could be affected? If yes, was MDT notified?	
24. Have there been any instances of a member of the governing board, employee, agent or third-party contractor submitted a false claim or engaged in fraudulent activity? If yes, was MDT notified? *If the subrecipient has credible evidence that a principal, official, employee, agent, or third party participant of the subrecipient, or other person has submitted a false claim under the False Claims Act, 31 U.S.C. §3729 et seq., or has committed a criminal or civil violation of law pertaining to such matters as fraud, conflict of interest, bribery, gratuity, or similar misconduct involving federal assistance, the subrecipient must promptly notify MDT so that is can notify the U.S. DOT Inspector General, in addition to the FTA Chief Counsel or Regional Counsel.*	

CONTROL ENVIRONMENT

Office of Management and Budget 2 CFR Part 200 states, "consideration should be given to the control environment over Federal programs and such factors as the expectation of management's adherence to Federal statutes, regulations, and the terms and conditions of Federal awards and the competence and experience of personnel who administer the Federal programs." Factors that influence an agency's control environment include: corporate culture, transparency, code of ethics, documentation and adherence to agency policies, segregation of duties, physical controls, and a system of approvals.

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

8. Has management established policies for controlling access to computer programs and data files? If yes, please describe. *Good practice*	
9. Is access to data restricted to only those who require the data to perform their job? *Good practice*	
10. Are the procedures for information security adequate to protect the integrity of the data? *Good practice*	
11. Are procedures in place to ensure that terminated employees do not have access to documents, records, and assets? If yes, please describe. *Good practice*	
12. Do you inform the governing body in a timely manner of sensitive information, investigation, and improper acts (e.g., significant litigation, investigations by regulatory agencies, embezzlement, misuses of corporate assets)? *Good practice*	

TECHNICAL CAPACITY

Subrecipients must have the technical capacity to implement the project, manage grants, and comply with federal and state requirements. To demonstrate technical capacity, subrecipients must have an appropriate organizational structure; have an adequate number of staff; maintain adequate documentation of key policies; have a systematic process for determining the number and size of vehicles for the fleet; submit timely, accurate, and complete quarterly reports; and collect and analyze key performance data.

1. Is there an organization chart? Does the current organization chart clearly show lines of authority and responsibility for all staff, administration, and the governing body? *Good practice*	
2. Is the organization chart reviewed annually and revised when necessary? *Good practice*	
3. Who is responsible for the day-to-day management of the transit program?	
4. Has the manager completed the initial training to receive the Montana transit manager certification and has the manager completed the continuing education requirements to maintain the certification? *MDT requires that transit managers complete the MDT transit manager training and meet continuing education requirements.*	
5. Do the answers to the questions for the compliance and good practices review indicate the manager is qualified for the position by reason of training, education, and experience?	
6. Please describe your staffing and the responsibilities of key staff. Does the number of staff appear appropriate for the number and complexity of tasks and the size of the program? *MDT requires that subrecipients have sufficient staff to implement the program.*	

7. Is decision-making performed at the correct organizational level? Has the manager delegated smaller decisions to line supervisors and staff and do staff bring to line supervisors and to the manager decisions that have larger (policy, legal) ramifications for the organization? *Good practice*	
8. Does the organization have a written business continuity plan that addresses maintaining operations after a catastrophic event such as a tornado, flood or fire? *Good practice*	
9. Do you have document control and retention procedures? If yes, do they address: *Good practice*	
a. Records filing and storage	
b. Naming, storing, and backing up electronic files	
c. Security	
d. Retention	
e. Destruction	
10. Who is responsible for purchasing vehicles? What is the process for determining the number and size of vehicles for the fleet? Are decisions for expanding the fleet based on ridership projections and included in the TDP? *MDT considers the ability of the subrecipient to determine the appropriate number and type of vehicles when determining whether a subrecipient has the technical capability to receive grants to buy buses.*	
11. Who is responsible for preparing and submitting the quarterly reports?	
12. Are reports submitted on time? If no, what are the reasons for the delay?	
13. Reviewer, discuss any comments or issues with the reports. Please respond to the reviewer's comments.	

14. Have any special labor protection warranty complaints been received? If yes, were they reported to MDT? How were the complaints resolved? *Subrecipients must report any special labor warranty complaints and how they were resolved to MDT.*	
15. Do you contract with private operators or other agencies? If yes, please identify. Who is responsible for managing the contract? What procedures are used to ensure that quality service is provided? *Subrecipients must have procedures for managing service contractors to ensure that quality service is provided.*	

FINANCIAL MANAGEMENT

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

FINANCIAL CAPACITY	
1. Does the agency have an adequate cash flow? If not, what steps are being taken to ensure this?	
2. Do you have reserves? If yes: What is the amount? How many months of operations will it cover? *MDT requires subrecipients to have one month's operating expenses in reserve. MDT strongly recommends that subrecipients have at least three month's operating expenses in reserve.*	
3. Since the last review, how many of your transit program vendors were paid within 30 days? [Sample]	
4. Are you able to make payroll?	
ACCOUNTING SYSTEMS AND POLICIES	
5. What accounting software is used? Which modules?	
6. Is information generated from the program sufficient to support expenditures to awards?	
7. Does the agency maintain an up-to-date accounting policies and procedures manual that covers accounting for fixed assets, the budget process, accounts payable process, procurement, payroll, record retention, reporting requirements, and requirements and schedules for audits? *Subrecipients must maintain an up-to-date accounting policies and procedures manual.*	
8. Are there written travel policies for staff and governing body members which detail at a minimum: a) Use of per diem rate or actual expenses, basis of reimbursement and reasonable dollar limits	

b) Requirements for receipts for lodging and meals when reimbursement is made for actual cost	
c) Requirement for approval of travel requests	
d) Requirement for travel expense vouchers to show purpose of trip	
9. Are the financial records being kept in accordance with Generally Accepted Accounting principles (GAAP)? *Subrecipients must maintain financial records in accordance with GAAP principles. GAAP principles are the basis of financial accounting and reflect federal financial accounting standards which include consistency, relevance, reliability, and comparability. AccountingPrinciples.org provides information on GAAP.*	
10. Are financial records retained for at least 3 years after close of the project? *Subrecipients must maintain financial records for at least 3 years from the close of the project.*	
11. Are timesheets approved by an official who is not responsible for their preparation and is outside the payroll department? *Good practice*	
AUDITS	
12. Was a single audit conducted in accordance with Office of Management and Budget (OMB) requirements? *The U.S. Office of Management and Budget (OMB) requires that any recipient that expends more than $750,000 in federal funds in a year must have an independent single audit conducted.*	
13. Since the last site visit, have audit findings been submitted that relate to the transit program? If not, why not? *Subrecipients must submit audit findings that relate to the transit program to MDT.*	

14. What is the status of the following findings from the audit?

Subrecipients must resolve audit findings in a timely manner.

Finding*	Response*	Status

*To be completed by reviewer prior to sending the workbook to the subrecipient.

INDIRECT COSTS	
15. Are indirect costs charged to grants? If yes: *Per OMB 2 CFR Part 200, indirect costs are costs that are incurred for a common or joint purpose that benefits more than one cost objective and are not readily assignable to the cost objectives specifically benefited without effort disproportionate to the results achieved. Examples of indirect costs are accounting and personnel services.* *Subrecipients that charge indirect costs to awards must do so in accordance with an approved cost allocation plan or indirect cost rate proposal. Or use in the de minimis rate per 2 CFR Part 200.414.*	
a. Is there a cost allocation plan or indirect cost rate proposal to support indirect administrative costs related to an award program?	
b. Was the plan developed in accordance with 2 CFR Part 200?	
c. Who approved the plan? When was it last approved?	
d. Has the auditor reviewed the plan?	
e. Has the plan been submitted to the state? *The plan must be submitted to MDT.*	
f. Have procedures been established to ensure that costs are classified as either direct or indirect (but not both)?	
g. Has the plan been followed?	
h. Has the rate been updated annually? *The indirect cost rate must be updated annually unless the de minimis rate is being used.*	

i. Has the methodology changed used to calculate changed since the plan was approved?	
BUDGETING	
16. Please describe the process used to develop the budget. Is the process documented? Who is responsible for developing the budget?	
17. Are the goals, objectives, and targets approved by the governing body used to guide the development of the budget?	
18. Does the governing body approve the budget?	
19. Is the budget prepared in sufficient time to allow full review and interaction by the governing body?	
20. Is the governing body provided a budget with sufficient detail to make decisions about the allocation of program resources?	
21. Are long-range financial needs defined during the annual budget process and alternatives reviewed?	
22. Are anticipated farebox revenue, contributions, grants, contracts, and other program income projected in the budget?	
23. Are actual expenditures compared with budgeted expenditures periodically to prevent budget overruns? How often? Who performs this comparison? *49 CFR Part 200.302 requires subrecipients to perform a budgeted versus actual analysis.*	
24. Are revenues from federal, state, and local government sources, service contracts, and fares compared with the projections in the budget periodically? How often? Who performs this comparison? *49 CFR Part 200.302 requires subrecipients to perform a budgeted versus actual analysis.*	
25. How are budget changes documented?	

26. Does the governing body review and approve budget revisions? What is the threshold for governing body approval?	
RISK MANAGEMENT	
27. Do you carry risk, liability, workman's compensation, and fire insurance?	
28. Do you analyze alternative insurance programs including self-insurance and excess liability coverage for property damage and liability at least every 3 years?	
29. If self-insured, is there a self-insurance reserve account?	
30. Is there a workers' compensation management system which provides for verification of accident/injury, administration of benefits, vocational rehabilitation?	

TECHNOLOGY AND INFORMATION SYSTEMS

Subrecipients should use information technology to improve productivity and provide needed financial and performance information. Procedures should be in place to protect hardware and software. Policies should be in place governing personal use of public computers. FTA-funded computers must be used to support the transit program.

1. Are computer applications current with respect to needs and appropriate to the hardware environment? *Good practice*	
2. Who maintains the software? Does this person/entity possess the necessary training, education, and experience to provide adequate technical support?	
3. Is software regularly updated with patches and security updates? How frequently? Are all security/patches current? *Good practices*	
4. How often are the servers/computers backed up? Where is the back-up data stored?	
5. How frequently are virus definitions updated? Are virus definitions current? How frequently do you scan for viruses? *Good practices*	
6. Do you use a local area network?	
7. Does the system administrator have access to the hard drives of all computers? *Good practice*	
8. Who maintains the hardware and network? Does this person/entity have the necessary training, education, and experience to provide adequate technical support?	

9. Do the servers have an uninterruptible power supply (UPS)? *A UPS allows a computer to run on battery power during short power interruptions and allows the user to shut down a computer properly during a power interruption. A UPS has a built-in surge protector.*	
10. Are all computer equipment items protected from power surges? *Good practice*	
11. Which employees have access to the Internet?	
12. Is access to data restricted to only those who require the data to perform their job?	
13. Do you have a written policy regarding personal use of the computer, including use of the Internet? *Good practice*	
14. Do employees have agency email addresses?	
15. Do you have a website? If yes: What is the address? Who maintains it?	
16. Are computers purchased with FTA funds being used to support the transit program? Are they used to support other programs as well? *Computer equipment purchased with FTA must be used primarily to support the FTA programs.*	
17. Do you provide general computer/ application training? If yes, when was the last time that the training took place? *Good practice*	

SATISFACTORY CONTINUING CONTROL

Subrecipients must maintain control of FTA-funded equipment and facilities and use them to provide public transportation. The number of spare vehicles must be appropriate to the size and age of the fleet, the amount of peak demand, and the projected ridership growth. Subrecipients must submit proof of insurance annually; carry enough insurance to replace any FTA-funded facility or equipment, such as bus washers, bus lifts, etc.; and obtain prior written approval from DPT before selling, leasing, or disposing of vehicles, equipment or facilities that have remaining federal interest. Subrecipients must have procedures to prevent loss, damage, or theft of FTA-funded property and inventory.

FLEET AND VEHICLE CHARACTERISTICS	
1. Calculate the fleet spare ratio. a) What is the number of revenue vehicles?	
b) What is the number of vehicles required for maximum service?	
c) What is the number of spare vehicles (a minus b)?	
d) What is the spare ratio (c divided by b)?	
2. How often is the maximum number of vehicles required?	
3. Does the spare ratio appear reasonable given the size and age of the fleet, the frequency of peak service demand, and the projected ridership growth? Does the spare ratio indicate a need for additional vehicles? *MDT considers a spare ratio of approximately 20 percent reasonable*.	
4. Are the vehicles used appropriate for the type of service, ridership volumes, and scheduling patterns?	
5. Have "back-up" arrangements been made, such as a contract with a taxi company or another agency, to deliver service when breakdowns occur or during peak service times?	

6. Have you sold or disposed of any FTA-funded vehicles in the past year? If yes: Please list the vehicles. Did you obtain approval from MDT? *MDT requires that subrecipients obtain approval before selling or disposing of vehicles on which it holds a lien.* [Reviewer, please list the vehicles for which the subrecipient requested approval for disposition since the last site visit.]	
7. Are leases attached to FTA-funded vehicles? If yes, did MDT approve the leases in writing? *MDT requires that subrecipients obtain written approval for leases of vehicles on which it holds a lien.* [Reviewer, please list the vehicles for which the subrecipient asked for approval since the last site visit.]	
INSURANCE	
8. Has an updated proof of insurance on each vehicle been provided to MDT? *MDT requires that subrecipients provide annual proof of insurance on FTA-funded equipment.*	
9. Do you have a combined single limit of coverage of at least $1 million on vehicles? What insurance coverage do you have on FTA-funded facilities? If self-insured, how is the self-insurance funded? *MDT requires subrecipients to maintain a minimum of a combined single limit of coverage of $1 million on vehicles.*	
INVENTORY AND CONTROLS	
10. What procedures and practices are used to prevent loss, damage, or theft of property and inventory? *Subrecipients must have procedures to prevent loss, damage, or theft of property and inventory.* Examples of procedures include insurance, locks on doors, controlled access to supplies, fencing, lighting, inventory and tagging of all equipment, and annual physical inventories that are reconciled to inventory lists.	

11. Is all equipment permanently tagged or stamped with an identification number?	
12. Is there a current, complete inventory of all equipment?	
13. What is the dollar threshold for inclusion in the asset inventory?	
14. Is a physical inventory of equipment taken at least annually that is reconciled to the inventory records?	
15. Are inventory item statistics maintained such as inventory level policy, consumption record, reorder points, economic order quantities, recent bidders and prices, and acquisition times?	
16. Are facility use or lease agreements current for all facilities?	

PROCUREMENT

Subrecipients must: comply with the relevant sections of FTA C 4220.1F. Subrecipients must obtain prior state approval for purchases of equipment and transportation service contracts.

1. Who is responsible for purchasing/ leasing? Is the person by reason of education, training, and experience qualified for the responsibility?	
2. Do you have a written code of conduct that governs the performance of officers, employees, or agents engaged in procurement exists describing avoidance of conflict of interest? *Subrecipients that are private nonprofit agencies must have a written code of conduct that:* • *Precludes any employee, officer, agent, or governing body member or his or her immediate family member, partner, or organization that employs or is about to employ any of the foregoing from participating in the selection, award, or administration of a contract supported with FTA assistance.* • *Includes information that the subrecipient's officers, employees, agents, or governing body members may neither solicit nor accept gifts, gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to sub agreements. The policy may set minimum rules for when the financial interest is not substantial or the gift is an unsolicited item of nominal intrinsic value.* • *Provides for penalties, sanctions, or other disciplinary action for violation of such standards to the extent permitted by state or local law or regulations.* *Subrecipients that are public entities are covered by the Montana Code of Ethics in Title 2, Chapter 2, Part 1 of the Montana Code Annotated 2019.*	
3. Do any potential conflicts of interest exist between policy governing body members/ employees and consultants/vendors/ suppliers or between a management contractor and consultants/vendors/ suppliers?	
4. Are procurement procedures written and approved by the governing body? *Subrecipients must have written procurement procedures.*	
5. Do policies and procedures adequately address such matters as:	

a) Independent cost estimates *Procurements > the federal simplified acquisition threshold, currently $250,000*	
b) Need and use of formal advertising	
c) Procurement method *Micro-purchases, small purchases, invitations for bids (IFBs), requests for proposals (RFPs)*	
d) Negotiating	
e) Use of sole source	
f) Selection procedures	
g) Required approvals/signatures	
h) Evaluation of procurements for potential organizational conflicts of interest	
i) Review of procurement requests to avoid duplicative or unnecessary purchases	
j) Cost/price analysis *Procurements > the federal simplified acquisition threshold, currently $250,000*	
k) Award to responsible bidders/proposers	
l) Protest procedures	
m) Contract administration	
n) Settlement of contract issues and disputes	
o) Documentation of procurement history	
6. Are the quantity and quality of supplies, equipment, services verified against the purchase order or other system upon receipt? *Required*	
7. Are technical specifications prepared at the appropriate level of detail to accommodate competitive bidding and user requirements? *Required*	
8. What is the dollar threshold for sealed bids?	

9. What are the procedures for purchases for which sealed bids are not required?	
10. Who reviews and approves purchases? What are the dollar thresholds?	
11. Do the above procedures provide for full and open competition? *Procurement procedures must provide for full and open competition.*	

12. Please list all procurements for which the subrecipient requested state approval since the last site visit.

Item	Amount

13. What purchases did you make with FTA funds since the last site visit? (Examples: fuel, maintenance services, vehicles, construction, professional services)	
a. What procedures were followed for each of the purchases?	
b. Did the procedures followed provide for full and open competition?	
c. Who administers the contracts?	
d. Do the files document the procurement history?	
e. Was state approval obtained for all equipment purchased directly? *MDT must approve all equipment purchases.*	
f. Was state approval obtained for all contracts for transportation services? *MDT must approve all transportation service contracts.*	

g. Are FTA-required clauses included in all contracts exceeding $10,000 ($2,000 for construction contracts)?? *Subrecipients must include federally required clauses in all FTA-funded procurements exceeding the federal micro-purchase threshold.* [Reviewer, please review the procurements for the past year using the clause checklist in the appendix.]	
h. Are there any clauses that unduly restrict competition, such as in-state or local preference clauses? *Use of in-state or local preference clauses is prohibited.*	
14. Are there any bus procurement contracts that exceed 5 years in total length, including base and options? If yes, identify. *The length of bus procurements using FTA funds may not exceed 5 years.*	
15. For procurements greater than $25,000, was the System for Award Management (www.sam.gov) searched to see if the vendor was debarred or suspended? *Recipients must search SAM before awarding contracts > $25,000 and document the results of the search for the file.*	
What proof of the search do you maintain in the procurement file?	
Have you become aware of any new information, following the award of a contract or subcontract, that an excluded party is involved in any covered transaction? If yes, did you promptly inform MDT in writing? *Subrecipients must provide immediate written notice to MDT for reporting to FTA if they learn that their certification or the certification of any contractors is no longer valid.*	
16. Have you obtained signed lobbying certifications with procurement solicitations exceeding $100,000? *Subrecipient must obtain signed lobbying certifications with bids or proposals exceeding $100,000 for FTA-funded procurements.*	

17. Have you obtained signed Buy America certifications for purchases of steel, iron, or manufactured products exceeding $150,000? *Subrecipient must obtain signed Buy America certifications with bids or proposals for steel, iron, or manufactured products, including buses, exceeding $150,000 for FTA-funded procurements.*	

PROCUREMENT FILE REVIEW SHEET

Contract number:	
Award date:	
Awarded to:	
Amount:	
Purpose:	
Number of bids received:	
Date file inspected:	

Item	Yes	No	NA
Does the file contain an index or checklist of items that it should contain? (*Good practice*)			
Are materials filed in chronological order?			
Does the file contain an independent cost estimate (ICE)? (procurements > $250,000 and all change orders)			
Does the file contain the rationale for the method of procurement and contract type?			
Does the file contain the invitation for bids or the request for proposals?			
Does the file contain the notices and advertisements?			
If a pre-bidders' conference was held, does the file document the bidders notified of the conference, the date and time of the conference, and the list of the attendees?			
Does the file include all bids received?			
Does the file document the evaluation and the results of the evaluation?			
Does the file document the responsibility determination of the selected vendor?			
If the procurement was a sole source, single bid, brand name, or award to other than low bidder, does the procurement file contain a justification for the award?			
Does the file contain a cost or price analysis (procurements > $250,000 and all change orders)?			
Does the file contain a signed contract?			
Were all federally-required clauses included in the contract and required signed certifications (Buy America, lobbying) obtained?			

Contract number:	
Award date:	
Awarded to:	
Amount:	
Purpose:	
Number of bids received:	
Date file inspected:	

Item	Yes	No	NA
Does the file contain documentation that the System for Award Management was searched before award for all procurements exceeding $25,000?			
Do the files indicate that the subrecipient ensured that goods and services were received?			
Does the file include all contract modifications and amendments?			
Does the file contain copies of all correspondence with the vendor?			
If there were changes orders, were an ICE developed and a cost/price analysis conducted?			

DISADVANTAGED BUSINESS ENTERPRISE (DBE)

Subrecipients must not discriminate on the basis of race, color, creed, national origin, or sex in the award and performance of FTA-assisted contracts. They must provide DBEs the maximum opportunity to compete for and perform contracts and subcontracts financed in whole or in part with federal funds. Subrecipients must submit quarterly DBE reports to MDT.

1. Did the subrecipients report on DBE activity in the quarterly reports? If not, please list the quarters the subrecipient did not submit the information. *Subrecipients must submit quarterly DBE activity reports*.	
2. Do the reports indicate that the subrecipients has been successful in contracting with DBEs?	
3. What efforts have been taken to ensure that DBEs and small businesses have the maximum opportunity to compete for and perform contracts and subcontracts financed in whole or in part with FTA funds? *Subrecipients must ensure that DBEs have the maximum opportunity to compete for and perform contracts and subcontracts financed in whole or in part with FTA funds. Examples include advertising in newspapers that serve minority communities, maintaining a list of minority vendors, and contacting other agencies for potential DBE contractors*.	
4. Do you have a current MDT listing of certified DBE firms? *MDT maintains an on-line DBE directory*.	
5. Were any DBE complaints received since the last review? If yes: Describe the complaint and how it was resolved. What is the process for handling and resolving such complaints? Were they forwarded to MDT?	

PERSONNEL

Subrecipients should have governing body-approved, comprehensive personnel policies. Current job descriptions should be on file for every position. Time and attendance records must be kept on every employee.

1. Who is responsible for personnel management? Is the person by reason of education, training, and experience qualified for the responsibility?	
2. Are personnel policies written and approved by the governing body? *Good practice*	
3. Do the policies address: *Good practice*	
a) Personnel selection and appointment	
b) Required probationary period before permanent appointment	
c) Grounds for dismissal/appeals	
d) Grievance procedures	
e) Hours of work	
f) Annual and sick leave	
g) Holidays	
h) Promotion and/or salary increases	
i) Insurance benefits	
j) Retirement plans	
4. Are there written job descriptions on file for all positions in the transportation program? *Good practice*	
5. Do the job descriptions identify: a) Job title	
b) Primary responsibilities	
c) Performance standards	
d) Wage rate or salary range	

e) Physical requirements	
f) Safety-sensitive position subject to drug and alcohol testing	
6. Are time and attendance records kept for and signed by all employees, including part-time, and in-kind (or volunteer)? [Sample] *Required*	
7. Is each employee appraised on performance at least annually *Good practice*	
8. Does the agency provide documented coaching, counseling, re-training, and discipline based on unsatisfactory employee performance? *Good practice*	
9. How do you protect personal identifying information (PII)? *The Department of Homeland Security defines PII as any information that permits the identity of an individual to be directly or indirectly inferred, including any information that is linked or linkable to that individual, regardless of whether the individual is a U.S. citizen, legal permanent resident, visitor to the U.S. PII, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual.*	

EQUAL EMPLOYMENT OPPORTUNITY (EEO)

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

1. Does the agency meet the threshold for submitting an EEO program plan to the state? *Unless a program is submitted directly to FTA, a subrecipient must submit an EEO program plan to MDT every four years if it has 50 or more transit-related employees and receives $1 million or more in FTA capital and/or operating funds or $250,000 in planning funds in a year.*	
2. Who is responsible for ensuring that EEO obligations are fulfilled? To whom does this individual report for EEO matters?	
3. Have you posted an EEO statement in a conspicuous place? *An EEO statement must be posted in a conspicuous place where employers and applicants will see it.*	
4. Is an EEO policy included in your personnel policies and/or employee handbook? *An EEO policy should be included in personnel policies and/or employee handbook.*	
5. Are EEO statements included on your job applications and employment notices? [Sample] *Job applications and employment notices should include an EEO statement.*	
6. Were any EEO complaints received since the last site visit? If yes: Describe the complaint and how it was resolved. What is the process for handling and resolving such complaints?	

OPERATIONS AND SERVICE PROVISION

SERVICE PROVISION

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

1. Who is responsible for the day-to-day supervision of transit operations?	
2. How are daily operations monitored to ensure that the schedule is adhered to, dispatchers and operators follow policy and procedures, and quality and courteous service is provided? *Good practice*	
3. Is there a written service policy or operators' manual? Please note the topics the manual addresses. When was it last updated? Does the policy/manual accurately and completely document current policies governing the delivery of service? *Good practice*	
4. When was the last time routes and schedules were revised for fixed route services? Do schedules need to be evaluated?	
5. Is schedule making coordinated with public information, dispatching and operations supervision? *Good practice*	
6. For demand-response service, what are the procedures for scheduling and dispatching trips? Are denials tracked and periodically reviewed by management? *Good practice*	
7. If service is scheduled in advance, have you made arrangements to have an answering machine take calls after business hours to schedule or cancel a ride?	

8. Please describe the pickup window for general public demand response service, route deviations, and ADA complementary paratransit service.	
How long do drivers wait for the passenger after having arrived within the pickup window?	
Do drivers note arrival and departure times on the manifest?	
9. Please describe your fare structure.	
10. What is your policy regarding transfers? Do you charge a fare for transfers? If yes, what is the transfer charge?	
11. When was the last fare increase?	
12. For fixed-route and route-deviation services, do you track boarding and/or alighting by stop?	
13. How are financial reports, service reports and statistical data used in day-to-day management of transit service? *Good practice*	
14. To whom do you report these data and what key management decisions have been made with the above data? What data are reported to the governing body and how often? Does the reporting system contribute to each level of management in terms of timely, accurate, appropriately detailed information required to support management action? *Good practice*	
15. Do the data reported to MDT for National Transit Database (NTD) cover all operations, including those not supported with Section 5311 assistance? *Required*	
16. List the annual ridership figures for the past 5 years below. Please explain why ridership is increasing, decreasing, or staying the same.	
Year	**Ridership**

17. Do you have a written rider guide? If no, how is the public informed of agency policies? *Good practice*	
18. Do you have a governing body-approved policy governing standards of behavior by passengers on buses and transit property? *Good practice*	
19. How do you handle violations of the passenger behavior policy?	
20. Do you have a no-show policy? If yes, has it been approved by the governing body? *Good practice*	
21. If you suspend riders for unruly behavior or no-shows: Who makes the decision? What is your appeals process for suspensions? *Good practice*	
22. Who receives complaints and how are they processed? How do you follow up with the complainant? Do you keep a record of complaints?	
23. Are the complaint/ comment resolution procedures written? *Good practice*	

MAINTENANCE

Subrecipients must maintain FTA-funded equipment and facilities. They must have a written maintenance plan and maintain project equipment and facilities at a high level of cleanliness, safety, and mechanical soundness. They must maintain all accessibility features and equipment in operating condition. They must have procedures to track when preventive maintenance inspections are due and to schedule preventive maintenance inspections in a timely manner.

Subrecipients must have a pre-trip inspection program that addresses vehicle condition, appearance, cleanliness, safety, and ADA accessibility equipment. Deficiencies noted in a pre-trip inspection must be repaired in a timely manner and properly reviewed by management.

Subrecipients must repair accessibility features promptly and take reasonable steps to continue service to persons with disabilities while repairs are being made.

VEHICLE MAINTENANCE	
1. Review the files for the 2 vehicles using the vehicle file review sheet. Note deficiencies for each file inspected.	
2. Who is responsible for maintenance? Is the person by reason of education, training, and experience qualified for the responsibility?	
3. Are maintenance personnel trained in the operation of specialized equipment (special tools, wrecker, others)?	
4. Please describe the preventive maintenance program. Note whether the subrecipient follows the MDT program or follows a program it developed. Is the maintenance plan written? *Subrecipients must have a written vehicle maintenance program*.	
5. Do preventive maintenance schedules for each type of vehicle in the fleet meet or exceed the manufacturer's minimum requirements? *Preventive maintenance schedules must meet or exceed the manufacturers' minimum requirements*.	
6. Where are the owner's manuals and manufacturer specifications filed?	

7. Is a preventive maintenance program in place for lifts and other accessibility features such as ramps, public announcement systems, and annunciators? *Subrecipients must maintain all accessibility features and equipment in operating condition.*	
8. Is a preventive maintenance program or system of checks in place for on-board security systems? Please describe.	
9. What procedures are used to track when preventive maintenance inspections are due and to schedule preventive maintenance inspections? *Subrecipients must have procedures to track when preventive maintenance inspections are due and to schedule preventive maintenance timely.*	
10. Review the files for the same 2 vehicles reviewed in question 1. Note the date and mileage of all preventive maintenance inspections since the last site visit using the preventive maintenance review sheet. Does the review of the maintenance records indicate that at least 80 percent of the inspections are performed on time? Please allow a 10 percent or 500-mile variance, whichever is greater, when deciding whether an inspection was performed on time. *MDT requires that at least 80 percent of preventative maintenance inspections must be performed at the intervals required by the plan.*	
11. Does the review of the maintenance files indicate that the files are complete and document maintenance performed?	
12. Are emergency exits and pop-up roof hatches tested periodically to ensure that they are in working order? If yes: How often? How is the check documented?	
13. Are pre-trip inspections conducted prior to placing a vehicle in service? *Pre-trip inspections must be conducted prior to placing a vehicle in service.*	
14. Is the MDT pre-trip inspection form used? **If no:**	

a. Does the pre-trip inspection address safety; vehicle operation, appearance, and cleanliness; and passenger comfort? *The pre-trip inspection must address safety; vehicle operation, appearance, and cleanliness; and passenger comfort.*	
b. Does the pre-trip inspection ensure that all items, such as boxes with bi-directional reflective triangles and gallons of washer fluid, are secured to the vehicle? *Safety and other equipment must be secured so that they do not become projectiles that injure a passenger or damage the vehicle.*	
c. Does the pre-trip inspection program address lifts and other accessibility features, such as ramps, public announcement systems, and tie-downs? *Subrecipients must have a regular system of checks and inspections for lifts and ensure that accessibility features are maintained in operative condition.*	
15. Are deficiencies noted in pre-trip inspections repaired in a timely manner and properly reviewed by management? *Deficiencies noted in pre-trip inspection must be repaired in a timely manner and properly reviewed by management.*	
16. How does the agency document maintenance activity performed to correct the reported defect? *The good practice is for the mechanic to sign and date the pre-trip inspection form noting that the reported defect has been repaired and to include the signed pre-trip form in the maintenance file with the work order.*	
17. When a list or ramp is found to be inoperative: a. Is the vehicle taken out of service by the beginning of the next service day and repaired before returning it to service? *USDOT ADA regulations (49 CFR 37.163(d)) requires subrecipients to remove vehicles with inoperative lifts from service before the next day unless no spare is available and taking the vehicle out of service would reduce the level of service.*	

b. If a vehicle with an inoperable lift or ramp is kept in service, is it repaired within 5 days from the day which the lift is found to be inoperable? *USDOT ADA regulations ([49 CFR 37.163(e)](#)) requires subrecipients in areas of less than 50,000 to repair the lift or ramp within 5 days.*	
18. Are FTA-funded vehicles leased to providers? If yes, does the lease agreement require the lessee to adhere to MDT's maintenance standards? *MDT requires subrecipients that lease FTA-funded vehicles to providers to require the lessee to adhere to MDT's maintenance standards.*	
19. Are work orders or histories maintained that document the work performed, parts used, time spent, mileage, and date?	
20. Has a maintenance quality control or assurance program been implemented to verify the execution and quality of repairs, examine the quality of new and used parts used in repairs, and ensure that repairs are fully documented?	
21. Who is responsible for washing and cleaning the buses? How often are buses washed? What quality assurance or inspection procedures are in place to ensure buses are kept clean?	
22. Do the vehicles meet an acceptable level of cleanliness (exterior and interior)? *Reviewer will answer.*	
23. Is there a system for identifying and pursuing warranty claims effectively and promptly to conclusion?	
24. Is there a system for responding to recalls?	
25. Is the preventive maintenance program reviewed for costs and effectiveness?	
26. Are maintenance histories for the fleet reviewed to uncover trends or problems?	
27. Are there indicators of repetitive occurrences of a particular type of problem in any one make of rolling stock?	

28. Are there repetitive occurrences (parts failures, road calls, others) of a particular type of failure fleetwide?	
29. Is there a system to monitor and evaluate vehicle energy consumption?	

FACILITY MAINTENANCE

The following questions are for subrecipients that operate out of an FTA-funded facility.

30. Is there a written facility maintenance plan and inspection checklist? *Subrecipients must have a written facility maintenance program for FTA-funded facilities and facility-related equipment*.	
31. Are the facilities inspected at least once a year to determine what repairs and/or maintenance are needed to the equipment or building? What was the date of the last inspection?	
32. Does the written plan or inspection checklist address equipment such as hydraulic lifts, bus washers, roofing systems, HVAC systems, emergency generators, and security systems?	
33. Does the written plan or inspection checklist address maintenance of ADA accessibility features, such as power-assist doors, as required by ADA? *USDOT ADA regulations (49 CFR 37.161) require maintenance of accessibility features.*	
34. Do preventive maintenance checklists follow the minimum requirements determined by the manufacturer, supplier or builder?	
35. What are the procedures for inspecting, cleaning, and maintaining bus shelters and benches?	
36. Are files maintained on maintenance of facilities and related equipment?	
37. Do the files indicate that preventive maintenance inspections of facilities and related equipment are conducted at the intervals required by the plan? [Reviewer, sample maintenance records.]	

38. Are any features of facilities or related equipment under warranty? If yes, please list. Are warranty claims pursued?	
39. Reviewer, are the facilities clean and well maintained? Are there any visible defects? Does the facility need to be painted? If yes, when is this scheduled?	
40. What documentation does the service maintain to ensure compliance with applicable safety and environmental regulations (OSHA, fire prevention, insurance standards, etc.)?	

VEHICLE FILE REVIEW SHEET

Subrecipient:

Vehicle:

Date File Inspected:

Reviewer:

Question	Yes	No
Are the files in chronological order?		
Do the files contain a log that summarizes maintenance provided?		
Do the files contain the MDT-provided or an MDT-approved pre-trip inspection checklist?		
Are the pre-trip inspection checklists signed and dated?		
For lift-equipped vehicles, do the files contain the daily pre-trip wheelchair lift safety check?		
Are preventive maintenance checklists:		
Completed?		
Signed?		
Dated?		
Do the work orders fully document vehicle maintenance?		
Are work orders signed and dated?		
Is the date and mileage noted on each work order?		

Reviewer comments:

VEHICLE PREVENTIVE MAINTENANCE REVIEW SHEET

Subrecipient:

Vehicle:

Date file inspected:

Reviewer:

Percentage of inspections completed on time (within a 10 percent or 500-mile variance, whichever is greater):

Type of Inspection	Date	Mileage	Mileage Since Last Inspection

SAFETY AND SECURITY

Subrecipients must document that drivers have a valid operator's license, have a safe driving record, and have been trained in first aid. All safety devices must be maintained in operative condition. All vehicles must be outfitted with a blood-borne pathogens kit, first-aid kit, fire extinguisher, bi-directional reflective triangles, and web cutters. Drivers and passengers must wear seat belts. Drivers must focus on driving and limit distractions when vehicles are in motion.

1. Who is responsible for system safety? Security?	
2. Do you have a written safety plan? Security plan? Emergency preparedness plan? *Good practice*	
3. Do you have a call down list for use in an emergency? If yes, is it up-to-date? *Good practice*	
4. Is documentation maintained which verifies that all drivers of vehicles (owned, leased, loaned): *Good practice*	
a) Have a valid, appropriate vehicle operator's license (and current USDOT physical if driver is a CDL holder)	
b) Have a safe driving record acceptable for insurance coverage	
c) Received training in agency policies and procedures?	
d) Have completed an American Red Cross, or equivalent, first aid program to handle emergency health situations and accidental injuries	
e) Received training in defensive driving techniques	
f) Received training in passenger assistance and safety	
g) Received training in operation of lifts and other accessibility equipment	

h) Received substance abuse training	
5. What additional training do you provide operators/ drivers?	
6. What training do you provide schedulers/ dispatchers?	
7. Is a record of who attended training, including names, sign-in sheet, content retained? *Good practice*	
8. Are training records kept by driver and dispatcher documenting the training received? *Good practice* [Reviewer, examine training files.]	
9. Have written procedures have been established to assure that project sponsored volunteers, whether reimbursed for expenses or not, driving privately-owned vehicles have: *Required*	
a) A valid appropriate vehicle operator's license (and current DOT physical if driver is a CDL holder)	
b) A safe driving record	
c) Personal automobile liability coverage that is appropriate for type of use	
10. If the agency does not use the MDT pre-trip form, does the inspection address the following required safety equipment: ▪ blood-borne pathogen kit ▪ first aid kit (full) ▪ fire extinguisher (charge and inspection date) ▪ bi-directional reflective triangles ▪ belt cutters *All vehicles must be outfitted with a blood-borne pathogens kit, first-aid kit, fire extinguisher, bi-directional reflective triangles, and belt cutters.*	

11. Are all required safety devices or systems installed and functioning properly on vehicles? Are fire extinguishers secure, accessible, of the correct type, and in date? (Sample) *All safety devices must be maintained in operative condition. Fire extinguishers must be secure, accessible, and in date.*	
12. Who is responsible for investigating accidents?	
13. What are the procedures for investigating accidents?	
14. Are written reports made? If yes: To whom do the reports go?	
15. Are written procedures for handling accidents and medical emergencies kept on board the vehicles? *Subrecipients must have a written procedure for handling accidents and medical emergencies.*	
16. Have fatal accidents been reported to MDT? *MDT requires subrecipients to report fatality accidents as soon as possible.*	
17. What traffic accident analysis and prevention activities are undertaken?	
18. Are passengers required to wear a seat belt? *All passengers must wear seat belts.*	
19. Are drivers allowed to bring food or drinks on board vehicles? If yes, are drivers allowed to eat or drink while the bus is in motion? *MDT prohibits operation of a vehicle while eating or drinking.*	
20. Are drivers allowed to use a cell phone while the bus is in motion? *MDT prohibits operation of a vehicle while using a cell phone unless the call is work-related. Sending and receiving text messages is prohibited. The National Safety Council has a model cell phone policy available at http://safety.nsc.org/cellphonekit.*	

21. Are all carry-on items properly stowed before moving vehicle? *MDT requires that all carry-on items be properly stowed before moving a vehicle*.	
22. Is there a methodology for identifying severe weather or other hazards that could affect agency operations and potentially trigger transit service shutdown? *Good practice*	
23. How are passengers notified of service disruptions, including those due to inclement weather?	
24. Does the agency have specific procedures and guidelines for drivers to follow when operating in inclement weather conditions in the service area, and have these procedures been formally communicated to drivers? Passengers? *Good practice*	
25. Do operations personnel receive training and retraining in crime prevention? What on-vehicle and at-facility crime prevention activities does the service employ? Examples include video cameras, locks, fencing, lighting, and silent codes.	
26. Has the agency familiarized local law enforcement and fire personnel on all aspects of transit vehicle operation including emergency exits, engine shut off, and wheelchair lifts?	
27. Have you worked with law enforcement, fire departments, medical services and emergency management agencies on emergency response efforts? What is your role in the plan?	

AMERICANS WITH DISABILITIES ACT (ADA)

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

1. What types of services (fixed route, route deviation, commuter, university, and/or demand response) do you provide?	
2. Who is responsible for and what is the process for resolving ADA complaints? How is the public informed on how to file an ADA complaint? Have any complaints of discrimination due to disability been received from riders? If yes: Please describe the complaints. Did you report the complaints to MDT? How long to you maintain the complaints on file? *USDOT regulations (49 CFR 27.13and 37.17) require procedures for addressing ADA complaints that incorporate appropriate due process standards and provide for prompt and equitable resolution. Subrecipients must sufficiently advertise the process for filing an ADA-related complaint and communicate a response promptly to any individual filing a complaint. The subrecipient is not required to respond to all complaints in writing, but rather must ensure the response can be documented internally. Subrecipients must retain copies of ADA-related complaints for at least one year and a summary of all ADA-related complaints for at least five years.* *MDT requires that it be notified of complaints.*	
3. Are facilities accessible?	

4. If you have non-accessible vehicles in your fleet, how do you ensure that equivalent service is provided? Have you denied service due to unavailability of accessible equipment? *MDT requires that it be notified of service denials due to unavailability of accessible equipment. USDOT ADA regulations require that service to individuals with disabilities be equivalent to the service provided other individuals with respect to response time, fares, geographic service area, hours and days of service, and capacity.*	
5. Are system brochures, application forms, rider handbooks, and occasional bulletins available in alternative accessible formats upon request? What formats? *USDOT ADA regulations (49 CFR 37.167(f)) require public information to be made available in alternative accessible formats upon request. Examples of alternative formats include websites, large type, audio-tapes, and Braille.*	
6. Is your system's TDD number printed on all public materials where your voice telephone number appears? *The TDD number should be listed wherever the voice telephone number appears.*	
7. What is the process to request a reasonable modification? How is the public informed on how to make requests for reasonable modifications? *USDOT ADA regulations (49 CFR 37.169) require a process for requesting reasonable modification to policies and practices to accommodate a person with a disability. Information on the reasonable modification process must be readily available to the public, and must be accessible. Advance notice can be required, but flexibility is also needed to handle requests that are only practicable on the spot. Individuals requesting modifications are not required to use the term "reasonable modification"*	
8. Do your require wheelchairs to be secured? If yes, how is the public informed on the policy? *USDOT ADA regulations (49 CFR 37.165(c)(3)) allow providers to require all wheelchairs to be secured.*	

9. What is your policy for providing service if a mobility device cannot be secured? *USDOT ADA regulations ([49 CFR 37.165(d)](#)) require that service must be provided even when a wheelchair device cannot be secured.*	
10. Do you require wheelchair users to transfer to a seat? *USDOT ADA regulations ([49 CFR 37.165(e)](#)) stipulate that operators may request but not require that wheelchair users transfer to a seat.*	
11. Do you place size or weight limitations on wheelchairs? Did you experience problems with lifts or ramps not being able to accommodate an individual in a wheelchair? How did you address the problem? *The USDOT ADA regulations ([49 CFR 37.165(b)](#)) prohibit entities from setting weight or size limitations on wheelchairs it will transport that understate the weight capacity that the vehicle fleet can accommodate.*	
12. Do drivers provide assistance to passengers as necessary and upon request with ramps, lifts, and securement devices? *USDOT ADA regulations ([49 CFR 37.165(f)](#)) require drivers and other personnel to provide assistance as necessary and upon request.*	
13. Do you permit individuals that do not use wheelchairs to use lifts? *USDOT ADA regulations ([49 CFR 37.165(g)](#))require operators to deploy lifts for standees upon request.*	
14. Regarding service animals:	
a. Are service animals allowed on the buses? *USDOT ADA regulations ([49 CFR 37.167(d)](#)) require operators to permit service animals to travel with riders.*	
b. Do you require service animals to be certified? *The USDOT prohibits requiring service animals to be certified.*	

c. Do you require service animals to be under the control of the passenger? Where is this policy documented? How is the public informed of the policy? *US DOT allows providers to require that service animals be under the control of the passenger.*	
d. Have you had problems with passengers bringing animals that do not appear to be service animals? How did you address the problem?	
15. Do you provide service to persons using respirators or portable oxygen? *USDOT ADA regulations (49 CFR 37.167(h)) require operators to provide service to persons using respirators or portable oxygen.*	
16. What is your policy regarding the time allowed for boarding and alighting? *USDOT ADA regulations (49 CFR 37.167(i)) require operators to allow adequate time for passengers with disabilities to board and alight vehicles.*	
17. Do you require drivers to make use of all available accessibility equipment? *USDOT ADA regulations (49 CFR 37.167(e)) require operators to make use of all available accessibility equipment when needed.*	
18. Are operators required to report lift failures Immediately? *USDOT ADA regulations (49 CFR 37.163(c)) require bus operators to report immediately any in-service lift and ramp failures.*	
19. Are persons sitting in priority seats requested to vacate those seats when a person with a disability needs to use them? *When an individual with a disability needs to sit in a seat or occupy a wheelchair securement location, the subrecipient shall ask the passenger to move in order to allow the individual with a disability to occupy the seat or securement location.*	
20. How are policies governing providing service to passengers covered under the ADA conveyed to drivers?	

21. Are drivers trained in passenger assistance and sensitivity? How soon after being hired does the training occur? *USDOT ADA regulations require that drivers receive training in passenger assistance and sensitivity.*	
22. Are drivers trained in use of accessibility equipment? How soon after being hired does the training occur? *USDOT ADA regulations require that drivers receive training in the use of the accessibility equipment.*	
23. How do you monitor drivers to ensure that they comply with ADA requirements? *Examples: Follow-up on complaints, ghost riders, road supervision, ADA advisory committee*	
24. Do you provide route deviation service? If yes: Do public materials and bus schedules clearly state that buses will deviate for anyone? Do public materials include the procedures for requesting deviations?	
25. Do you provide fixed route service: If yes:	
a. Do drivers announce stops? *USDOT ADA regulations (49 CFR 37.167(b)) require drivers to announce stops at transfer points with other fixed routes, major intersections and destination points, upon request, and at intervals along a route sufficient to permit individuals with visual impairments or other disabilities to be oriented to their location. MDT requires providers operating route deviation service to comply with the USDOT ADA regulations regarding stop announcements.*	
b. When multiple routes serve the same stop, what mechanism is in place to alert individuals with visual impairments or other disabilities to the route number and destination? *UDOT ADA regulations 49 CFR 37.167(c)) require operators to have such a mechanism.*	

c. Are lifts/ramps deployed at any stop? *USDOT ADA regulations ([49 CFR 37.167(g)](#)) require operators to permit a passenger who uses a lift or ramp to board or disembark from a vehicle at any designated stop, unless the lift or ramp cannot be deployed, the lift will be damaged if it is deployed or temporary conditions preclude the safe use of the stop by all passengers (i.e., the stop is "closed" for the duration of such conditions).*	
d. Is alternative service provided to persons stranded for more than 30 minutes due to failures? *If a lift or ramp failure occurs on a route where the headway is greater than 30 minutes and the passenger cannot be served, the subrecipient is required to provide alternative service within 30 minutes ([49 CFR 37.163(f)](#)).*	

ADA COMPLEMENTARY PARATRANSIT SERVICE

Providers of fixed-route service must provide service that is comparable to individuals whose disability prevents them riding fixed-route service. Service provided in accordance with 49 CFR Part 37 Subpart F is considered comparable.

1. Describe the eligibility process. How do you ensure that only those who are unable to use the fixed route system are certified as eligible? Are architectural and environmental barriers or conditions considered when determining eligibility? *The USDOT ADA regulations (49 CFR 37.123) restrict eligibility to certain categories of individuals:* • *Any person with a disability who is unable to board, ride, or disembark from an accessible vehicle without the assistance of another person (except for the operator of a lift or other boarding device)* • *Any person with a disability who could ride an accessible vehicle but the route is not accessible or the lift does not meet ADA standards* • *Any person with a disability who has a specific impairment related condition that prevents the person from traveling to or from a boarding/disembarking location*	
2. Is place of residence an eligibility criterion? *Place of residence is not an eligibility criterion.*	
3. Is paratransit service provided to others, such as seniors? If yes: Is ADA eligibility determined for these individuals? Are these riders counted as ADA trips? *Providers must determine ADA eligibility for all applicants, even if those applicants are eligibility under other criteria.*	
4. Are ADA complementary paratransit eligibility decisions made within 21 days of receipt of a complete application? If no, is presumptive eligibility granted? *The USDOT ADA regulations (49 CFR 37.125(c)) require eligibility decisions must be made within 21 days of receipt of an application; if not then presumptive eligibility must be granted until an eligibility decision is made.*	

5. Are applicants who are awarded eligibility given a written documentation of the decision? Are they provided documentation that includes the required information? *The USDOT ADA regulations (49 CFR 37.125(d)) require eligibility decisions to be made in writing. 49 CFR 37.125(e) requires the documentation of eligibility to include at least the following information:* • *The individual's name* • *The name of the transit provider* • *The telephone number of the entity's paratransit coordinator* • *An expiration date for eligibility, if applicable* • *Any conditions or limitations on the individual's eligibility* Reviewer: sample application files.	
6. Are applicants who are denied eligibility or given conditional or temporary eligibility: Given a written notice with specific reasons for the decision? Given notice of their right of appeal? *For persons awarded less than unconditional eligibility, the USDOT ADA regulations (49 CFR 37.125(d) and (g)) require the notification to state the specific reason for the decision and notify the applicant of the right to appeal.*	
7. Is presumptive eligibility granted if the appeal is not decided within 30 days of completion of the appeals process? *If the appeal is not decided within 30 days of completion of the appeals process, presumptive eligibility must be awarded until the appeal is decided (49 CFR 37.125(g)).*	

8. For visitors who wish to use the ADA complementary paratransit service:
 	
   a. What documentation is required for service?
 	
The USDOT ADA regulations (49 CFR 37.127) require that ADA service be provided to visitors. A visitor can become eligible in one of two ways:
 	
   1. The visitor can present documentation from his or her "home" jurisdiction's ADA complementary paratransit system that he or she is eligible. The local provider will give "full faith and credit" to the identification card or other documentation from the other entity.
 	
   2. The visitor can present, if the individual's disability is not apparent, proof of the disability (e.g., a letter from a doctor or rehabilitation professional) and, if required by the local provider, proof of visitor status (i.e., proof of residence somewhere else). Once the documentation is presented and is satisfactory, the local provider will make service available on the basis of the individual's statement that he or she is unable to use the fixed-route transit system, that is, the local provider cannot require functional testing.	

b. How long does the eligibility determination usually take? *Per FTA Circular 4710.1 Americans with Disabilities Act (ADA): Guidance, (Chapter 9, Section 9.9 Service for Visitors), awarding visitor eligibility is a fairly simple and quick process enabling individuals to contact the host agency to learn what is required and then being able to easily meet the requirements. This also means that upon receipt of any required documentation described above, transit agencies are to quickly enter necessary information into any databases or systems to permit visitors to place trip requests. FTA envisions this as a process that can often be completed the same day or no more than one day later.*	
c. Is service provided to ADA-eligible visitors for up to 21 days in a 365-day period? *Per the USDOT ADA regulations (49 CFR 37.127(e)), the entity is not required to provide more than 21 days of service within a 365-day period. It may request that the visitor apply for eligibility in order to receive additional service beyond this number of days.*	

d. How is the public informed of visitor eligibility? *Public information regarding visitor eligibility and the application process should be readily available.*	
9. Do you provide complementary paratransit service to ADA eligible individuals and their personal care attendants (PCA)? Do you charge the PCA a fare? Do your require the passenger to travel with a PCA? *The USDOT ADA regulations (49 CFR 37.123(f)) require the provision of service to PCAs. PCAs are not charged a fare. (49 CFR 37.131(c)(3)).* *The USDOT ADA regulations (49 CFR 37.5(e)) consider it discriminatory to require a rider to travel with a PCA.*	
10. Do you provide complementary paratransit service to ADA eligible individuals and at least one companion? Additional companions if space permits? What is the fare for a companion? *The USDOT ADA regulations (49 CFR 37.123(f)) require the provision of service to at least one companion and additional companions if space permits. A PCA is not considered a companion. Companions are charged the same fare as the ADA eligible rider. (49 CFR 37.131(c)(2)).*	
11. Do you provide service within ¾ miles of fixed routes and the core service area? *The USDOT ADA regulations (49 CFR 37.131(a)) require complementary paratransit service must be provided within ¾ miles of fixed routes and the core service area.*	
12. At a minimum, do you provide curb-to-curb service? Origin-to-destination when necessary? *The USDOT ADA regulations (49 CFR 37.129(a)) allow the base mode of complementary paratransit service to be curb-to-curb service but must be origin-to-destination when needed.*	
13. Is service provided the same days and hours as fixed-route service? *The USDOT ADA regulations (40 CFR 37.131(e)) require complementary paratransit to be provided the same days and hours as fixed-route service.*	

14. Are the fares no more than twice the fares for fixed-route service? *The USDOT ADA regulations ([49 CFR 37.131(c)](#)) cap fares for complementary paratransit service at twice the fares for fixed-route service..*	
15. Is service restricted or trips ranked by trip purpose? *The USDOT ADA regulations ([49 CFR 37.131(d)](#)) prohibit restrictions or priorities based on trip purpose.*	
16. Is next-day service provided? *The USDOT ADA regulations ([49 CFR 37.131(b)](#)) require, at a minimum, next day service to be provided.*	
17. Are requests for reservations accepted during normal business hours on all days prior to days of service? For next-day service, at what time of day are reservations cut off? How are reservations accepted when the administrative office is closed? *The USDOT ADA regulations ([49 CFR 37.131(b)](#)) require requests for reservations to be accepted during normal business hours on all days prior to days of service, even if the administrative office is closed. Answering machines can be used to take reservations.*	
18. Are pickups that cannot be accommodated at the time the passenger requests negotiated with the passenger and scheduled within one hour of requested time? *The USDOT ADA regulations ([49 CFR 37.131(b)](#)) require trips to be negotiated with the passenger and scheduled within one hour of the requested trip time.*	

19. Are rides that are not scheduled in a one-hour window tracked as denials even if the rider accepts an alternative time? When one leg of a trip cannot be reserved, is it tracked as two denials when the rider declines the roundtrip? *Per FTA Circular 4710.1 Americans with Disabilities Act (ADA): Guidance, (Chapter 8, paragraph 8.5.4 Trip Denials and Missed Trips – Prohibited Operational Practices), rides not scheduled in a one-hour window must be tracked as denials even if the rider accepts an alternative time. When one leg of a trip cannot be reserved and the rider declines to take both trips, it must be tracked as two denials.*	
20. Is a no-show suspension/late cancellation suspension policy used? If yes: *The USDOT ADA regulations (49 CFR 37.125(h)) allow providers to temporarily suspend service for a pattern or practice of no-shows.*	
a. What is the suspension policy for no-shows?	
b. How is it determined whether or not no-shows are under the rider's control? *Only no-shows that are under the rider's normal control should be counted against the rider.*	
c. Are no-shows caused by operator error counted against the rider? *No-shows caused by reasons beyond the rider's control (e.g., scheduling problems, late pickups, and operational problems on the part of the transit provider or a family emergency or sudden turn for the worse in a variable medical condition) or operator error must not be counted against the rider.*	
d. What are the thresholds for a cancellation before it is considered a no-show? *FTA permits transit providers to include late cancellations in their suspension policy, but only trips cancelled within two hours of the scheduled pickup.*	
e. Are only riders who have demonstrated a true pattern or practice of no-shows suspended? *A no-show policy must be narrowly tailored to ensure that suspension is only imposed for a true pattern or practice of missing scheduled trips.*	

f. Does the policy take into account frequency of rides? *The no-show policy must take into account frequency of rides.*	
g. Are financial penalties assessed for no-shows? *Systems may not impose a financial penalty as part of a no-show policy, including charging the fare for the no-show trip. With the rider's consent, systems may charge patrons the fares for missed trips in lieu of a suspension.*	
h. Are riders allowed to contest no-shows? *Riders must be allowed to contest no-shows.*	
i. Is there an appeals process for suspensions? *The policy must allow riders to contest no-shows and there must be an appeals process for suspensions.*	
j. Do you provide service during the appeal process? *The USDOT ADA regulations require the sanction to be stayed pending the outcome of the appeal.*	
The purpose of the following questions is to determine if there is a pattern or practice of capacity constraints. *The USDOT ADA Regulations (40 CFR 37.131(f)) prohibit subrecipients from limiting the availability of ADA complementary paratransit capacity.*	
21. When someone calls for a reservation, how many times does the phone ring before the schedule answers the phone? When one line is busy, do calls roll over to another line? If yes, how many lines do you have? Are callers put on hold? Do callers receive busy signals?	
22. What percent of requests are denied? How do you monitor trip denials?	
23. What do you consider an on-time trip? How do you monitor on-time performance? What is your on-time performance rate?	
24. How do you monitor missed trips? What percent of trips are missed?	

25. Do the answers to the above questions indicate that a capacity constraint exists?	
26. If you provide paratransit to other than ADA eligible riders are denials tracked separately for ADA and non-ADA trips?	

ADA INTERCITY BUS

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

1. Who is responsible for and what is the process for resolving ADA complaints? a. How is the public informed on how to file an ADA complaint? b. Have any complaints of discrimination due to disability been received from riders? If yes, please describe the complaints. c. Did you report the complaints to MDT? d. How long to you maintain the complaints on file? *USDOT regulations (49 CFR 27.13 and 37.17) require procedures for addressing ADA complaints that incorporate appropriate due process standards and provide for prompt and equitable resolution. Subrecipients must sufficiently advertise the process for filing an ADA-related complaint and communicate a response promptly to any individual filing a complaint. The subrecipient is not required to respond to all complaints in writing, but rather must ensure the response can be documented internally. Subrecipients must retain copies of ADA-related complaints for at least one year and a summary of all ADA-related complaints for at least five years.*	
2. Is the fleet 100 percent accessible? If not:	
a) How does a passenger arrange for an accessible vehicle? *49 CFR 37.193 (a)(1)(i) allows over-the-road bus operators to require up to 48 hours advance notice. Per clause 2.4 of the joint service agreement, the carrier shall provide accessible services when requested. A vehicle on-demand is acceptable.*	
b) If an individual with a disability does not provide advance notice, what efforts are made to provide the trip? *If an individual with a disability does not provide the advance notice the over-the-road bus operator requires, 49 CFR 37.193 (a)(1)(ii) requires the operator to make a reasonable effort to provide the service.*	

3. Is interline service provided? If yes, how does the carrier arrange for an accessible bus or equivalent service at each stage of the trip? *49 CFR 37.187 requires the over-the-road bus operator with which the reservation is made to arrange for an accessible bus or equivalent service.*	
4. Are intermediate or rest stops served? If yes: *49 CFR 37.201 requires the over-the-road bus operator to allow individuals with disabilities, including individuals using a wheelchair, to leave and return to the bus and to assist with boarding and alighting.*	
a. Are individuals with disabilities, including individuals using a wheelchair, allowed to leave and return to the bus?	
b. Do operators assist individuals with disabilities with boarding and alighting, as needed?	
5. Are system brochures, application forms, rider handbooks, and occasional bulletins available in alternative accessible formats upon request? If yes, what formats? How is the public informed on the availability of alternative accessible formats? *USDOT ADA regulations (49 CFR 37.167(f) and 49 CFR 37.209) require public information to be made available in alternative accessible formats upon request. Examples of alternative formats include large type, audio tapes, Braille, and information posted on the Internet.*	
6. Do you require all wheelchairs to be secured? *USDOT ADA regulations (49 CFR 37.165(c)(3) and 49 CFR 37.209) allow providers to require all wheelchairs to be secured to the driver's satisfaction. A wheelchair is a mobility aid belonging to any class of three- or more-wheeled devices, usable indoors, designed or modified for and used by individuals with mobility impairments, whether operated manually or powered.*	
7. What is your policy for providing service if a wheelchair cannot be secured? *The USDOT ADA regulations (49 CFR 37.165(d) and 49 CFR 37.209) require that service must be provided even when a wheelchair cannot be secured.*	

8. Do you require wheelchair users to transfer to a seat? *The USDOT ADA regulations ([49 CFR 37.165(e)](#) and [49 CFR 37.209](#)) stipulate that operators may request but not require that wheelchair users transfer to a seat.*	
9. Do you place size or weight limitations on wheelchairs? *The USDOT ADA regulations ([49 CFR 37.165(b)](#) and [49 CFR 37.209](#)) prohibit public entities from setting weight or size limitations on wheelchairs it will transport that understate the weight capacity that the vehicle fleet can accommodate.*	
10. Do drivers provide assistance to passengers as necessary and upon request with lifts, ramps, and securement devices? *The USDOT ADA regulations ([49 CFR 37.165(f)](#) and [49 CFR 37.209](#)) require drivers and other personnel to provide assistance as necessary and upon request.*	
11. Do you permit individuals that do not use wheelchairs to use lifts? *The USDOT ADA regulations ([49 CFR 37.165(g)](#) and [49 CFR 37.209](#)) require operators to deploy lifts for standees upon request.*	
12. Are lifts/ramps deployed at any stop? *The USDOT ADA regulations ([49 CFR 37.167(g)](#) and [49 CFR 37.209](#)) require that operators permit a passenger who uses a lift or ramp to board or disembark from a vehicle at any designated stop, unless the lift or ramp cannot be deployed, the lift will be damaged if it is deployed or temporary conditions preclude the safe use of the stop by all passengers (i.e., the stop is "closed" for the duration of such conditions).*	
13. How and when do operators report lift and ramp failures? *The USDOT ADA regulations ([49 CFR 37.203(b)](#)) require operators to report immediately any in-service lift failures.*	

14. What is the policy for removing a vehicle with an inoperative lift from service? *The USDOT ADA regulations (49 CFR 37.203(c) and (d)) require when a lift is discovered to be inoperative, the entity shall take the vehicle out of service before the beginning of the vehicle's next trip and ensure that the lift is repaired before the vehicle returns to service. If there is no other vehicle available to take the place of an OTRB with an inoperable lift, such that taking the vehicle out of service before its next trip will reduce the transportation service the entity is able to provide, the entity may keep the vehicle in service with an inoperable lift for no more than five days from the day on which the lift is discovered to be inoperative.*	
15. Regarding service animals:	
a. Are service animals allowed on the buses? *The USDOT ADA regulations (49 CFR 37.167(d) and 49 CFR 37.209) require that operators permit service animals to travel with riders.*	
b. Do you require service animals to be certified? *You may not require service animals to be certified.*	
c. Do you require service animals to be under the control of the passenger? *The USDOT ADA regulations allow providers to require that service animals be under the control of the passenger.*	
16. Do you provide service to persons using respirators or portable oxygen? *The USDOT ADA regulations (49 CFR 37.167(h) and 49 CFR 37.209) require operators to provide service to persons using respirators or portable oxygen.*	
17. What is your policy regarding the time allowed for boarding and alighting? *The USDOT ADA regulations (49 CFR 37.167(i) and 49 CFR 37.209) require that operators allow adequate time for passengers with disabilities to board and alight vehicles.*	
18. Do you require drivers to make use of all available accessibility equipment? *The USDOT ADA regulations (49 CFR 37.167(e) and 49 CFR 37.209) require that operators make use of all available accessibility equipment when needed.*	

19. How are policies governing providing service to passengers covered under the ADA conveyed to drivers?	
20. Are drivers trained in the use of accessibility equipment? In properly assisting passengers with disabilities who use the service with respect, courtesy and sensitivity? How soon after being hired does the training occur? *The USDOT ADA regulations (49 CFR 37.173 and 49 CFR 37.209) require that drivers are trained to proficiency, as appropriate for their duties, so that they operate vehicles and equipment safely, and properly assist and treat individuals with disabilities who use the service with respect, courtesy, and sensitivity.*	
21. Are persons sitting in priority seats requested to vacate those seats when a person with a disability needs to use them? *The USDOT ADA regulations (49 CFR 37.167(j) and 49 CFR 37.209) require that when an individual with a disability needs to sit in a seat or occupy a wheelchair securement location, the entity shall ask the passenger to move in order to allow the individual with a disability to occupy the seat or securement location.*	
22. Do drivers announce stops on fixed routes? *The USDOT ADA regulations (49 CFR 37.167(b) and 49 CFR 37.209) require drivers to announce stops at transfer points with other fixed routes, major intersections and destination points, upon request, and at intervals along a route sufficient to permit individuals with visual impairments or other disabilities to be oriented to their location.*	
23. When multiple routes serve the same stop, what mechanism is in place to alert individuals with visual impairments or other disabilities to the route number and destination? *The USDOT ADA regulations (49 CFR 37.167(c) and 49 CFR 37.209) require that operators have such a mechanism.*	
24. How do you monitor drivers to ensure that they comply with ADA requirements? Examples: Follow-up on complaints, ghost riders, road supervision, ADA advisory committee.	

DRUG AND ALCOHOL PROGRAM

Subrecipients and their contractors must have a drug and alcohol-testing program in place for all safety-sensitive employees. Maintenance contractors for providers in nonurbanized areas are not required to have a drug and alcohol-testing program.

1. Who is the person assigned to run the drug and alcohol program for your agency (drug and alcohol program manager (DAPM)/designated employer representative (DER)? Has the DAPM/DER signed up for the USDOT Office of Drug and Alcohol Policy and Compliance (ODAPC) email alerts?	
2. Who is the consortium/third party administrator (TPA)? The consortium/TPA draws the random sample, contracts the medical review officer (MRO), and usually contracts the collection site. Do you have a contract with the consortium/TPA? Does the contract with the consortium/TPA specify that it must comply with USDOT and FTA drug and alcohol-testing requirements (49 CFR Part 40 and 49 CFR Part 655)? *The contract must specify that the testing program must be implemented in accordance with USDOT regulations, 49 CFR Part 40,"Procedures for Transportation Workplace Drug Testing Programs," as amended, and FTA regulations, 49 CFR Part 655, "Prevention of Alcohol Misuse and Prohibited Drug Use in Transit Operations," as amended.*	

3. Who is your medical review officer (MRO)? Is the MRO a licensed physician (medical doctor or doctor of osteopathy), with appropriate medical training and knowledge of substance-abuse disorders? Is a copy of the MRO's qualification training certificate on file? Does the certificate indicate that the MRO's qualifications training has not expired? *The MRO reviews the results of all positive drug tests to confirm that they are truly positive and provides a quality assurance review of the drug testing process. The MRO must be a licensed physician with appropriate medical training and knowledge of substance-abuse disorders. The MRO must receive qualification training. Requalification training must be provided every five years. Obtain the identity and qualifications of the MRO from your consortium/TPA.* *More information on the role and qualification requirements of the MRO in the drug testing process can be found in 49 CFR Part 40 Subpart G.*	
4. Who provides the breath alcohol technicians (BATs) or the non-evidentiary alcohol-screening testing technicians (STTs)? Is a copy of each BAT's and SST's qualification training certificate on file? Do the certificates indicate that the qualifications training has not expired? *The BAT and STT work for the collection site. The BAT conducts USDOT breath alcohol screening and confirmation tests while the STT conducts USDOT saliva alcohol screening tests. Each BAT and STT must receive qualification training. Requalification training is required every five years.. Obtain the qualifications of these individuals from the collection site.* *More information on the role of the BAT and STT can be found in 49 CFR Part 40 Subparts J through N.*	

5. Who provides the urine collectors? Is a copy of each collectors' qualifications training certificate on file? Do the certificates indicate that the qualifications training has not expired? *The urine collectors work for the collection site. The collectors must receive qualification training. Refresher training must be provided every five years. Obtain the qualifications of these individuals from the collection site.* *More information on the role and training requirements of urine collection personnel can be found in 49 CFR Part 40 subparts C, D, and I.*	
6. Who are the substance abuse professionals (SAPs)? Are the SAPs licensed professionals with knowledge of and clinical experience in the diagnosis and treatment of drug and alcohol-related disorders? Is a copy of each SAP's qualifications training certificate on file? Do the certificates indicate that the SAPS have received the required continuing education? *When an employee or applicant fails a drug or alcohol test, you must refer him or her to an SAP. The SAP conducts a clinical assessment and evaluation of employees that test positive for drugs or alcohol and recommends a treatment program. The SAP must be a licensed professional with knowledge of and clinical experience in the diagnosis and treatment of drug and alcohol-related disorders. The SAPs must receive qualification training. Continuing education must be completed every three years.* *If you do not have an SAP directly under contract, contact your third party administrator for his or her qualifications.* *More information on the role of the SAP can be found in 49 CFR Part 40 Subpart O.*	
7. Have you adopted the MDT model drug and alcohol testing policy? If not, do you have a drug and alcohol policy that contains the following elements: a) Approval by governing board with effective date indicated	

b) Identity of contact person designated by the employer to answer questions about the anti-drug and alcohol-misuse program	
c) Safety sensitive functions subject to testing and list of covered job titles *Safety-sensitive functions are:* ▪ *Operation of a revenue service vehicle while in or out of revenue service* ▪ *Operation of a vehicle that requires a commercial driver's license (CDL)* ▪ *Controlling the movement or dispatch of a revenue service vehicle* ▪ *Maintenance of a revenue service vehicle (not if contracted)* ▪ *Security personnel who carry firearms* *Your policy must list the safety-sensitive functions performed by your agency and the job titles of persons who perform the safety-sensitive functions.*	
d) Prohibited behavior, including when the regulations prohibit the use of alcohol and drugs	
e) Testing circumstances for drugs and alcohol *Your policy must discuss the FTA-required types of testing you perform: pre-employment, random, reasonable suspicion, post-accident, return to duty (if you have a second chance policy) and follow up (if you have a second chance policy).*	
f) Testing procedures *The policy must include a reference to USDOT regulation, 49 CFR Part 40 "Procedures for Transportation Workplace Drug Testing Programs," as amended.*	
g) Requirement that covered employees submit to testing administered in accordance with 49 CFR Part 655	
h) Description of the behavior and circumstances that constitute a refusal to take a drug and/or alcohol test and a statement that refusals constitute a verified positive test *The policy must list all the refusals or state that refusals to test are listed in 49 CFR 40.191 for urine collections and 49 CFR 40.261 for breath tests.*	

i) Consequences for an employee who has a verified positive test, including the mandatory requirement that the covered employee be immediately removed from his or her safety-sensitive function and be evaluated by a SAP	
j) Consequences for an employee found to have a breath alcohol concentration of 0.02 or greater but less than 0.04	
k) Negative dilute retesting policy *Per [49 CFR 40.197](), the policy must state whether or not immediate retesting for negative dilutes is required and, if required, that the second test will be the test of record.*	
8. Is a copy of USDOT regulation, 49 CFR Part 40, "Procedures for Transportation Workplace Drug Testing Programs," as amended, readily available to any employee who requests a copy? *A copy of USDOT regulation, 49 CFR Part 40, "Procedures for Transportation Workplace Drug Testing Programs," must be made available to employees upon request.*	
9. Are the following types of drug and alcohol tests conducted? a) Pre-Employment (drugs only) b) Random c) Post-Accident d) Reasonable Suspension e) Return to Duty f) Follow-up	
10. Are the following substances tested for: a) Marijuana b) Cocaine c) Opioids d) Phencyclidine a) Amphetamines b) Alcohol	

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

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

13. How often are the names received for random testing from the third party administrator? Are random tests reasonably spread out during the draw period? Are random tests reasonably distributed across all days and hours of service? Are the date and time of notification and collection documented? *Random tests must be spread throughout the year, the draw period, and the hours of service. The date and time of notification and collection must be documented. 49 CFR Part 40 Subpart E discusses the collection process.*	

14. Were quarterly drug and alcohol reports submitted on time for the past 4 quarters? Do the reports indicate that the subrecipient conducts random testing? Were the tests conducted at lease at the current minimum random rates?	
15. Do you make proper post-accident determinations in regard to testing? Are post-accident tests of accidents that do not meet the FTA definition of an accident performed under the agency's own authority? *FTA defines accidents as an occurrence associated with the operation of a vehicle, if as a result:* *(1) An individual dies; or* *(2) An individual suffers bodily injury and immediately receives medical treatment away from the scene of the accident; or* *(3) With respect to an occurrence in which the mass transit vehicle involved is a bus, electric bus, van, or automobile, one or more vehicles (including non-FTA funded vehicles) incurs disabling damage as the result of the occurrence and such vehicle or vehicles are transported away from the scene by a tow truck or other vehicle.* *Post-accident testing under FTA authority must be performed as follows:* *Fatal accident: Employers must test all surviving covered employees on duty in the vehicle at the time of the accident and any other covered employee whose performance may have contributed to the accident.* *Nonfatal accidents: Employers must test all covered employees on duty in the vehicle at the time of the accident and any other covered employee whose performance may have contributed to the accident unless the employer determines that an employee's performance did not contribute to the accident. The employer must document the decision on whom to test and not to test.*	
16. What days and hours are the collection site open? Is the collection site available on all days and during all hours safety-sensitive functions are performed? *Random tests must be conducted during all days and hours safety-sensitive functions are performed.*	

17. Does the testing laboratory only release drug test results to the MRO? *The testing laboratory should only release drug test results to the MRO.*	
18. Is an employee's permission obtained before releasing drug and alcohol-testing records (except to the MRO, SAP, or program manager)? *An employee's permission must be obtained before releasing drug and alcohol-testing records to someone other than the MRO, SAP, or program manager.*	
19. Are employees and applicants for safety-sensitive positions who have a verified positive drug-test result or a breath-alcohol concentration of 0.04 or greater referred to SAPs for evaluation even if they are to be terminated? *Per 49 CFR 655.62 and 49 CFR 40.287, employees and applicants who have a verified positive drug-test result or a breath-alcohol concentration of 0.04 or greater must be referred to SAPs for evaluation even if they are to be terminated.*	
20. Have all safety-sensitive employees received 60 minutes of training on the effects and consequence of prohibited drug use on the personal health, safety, and the work environment, and on the signs and symptoms that may indicate prohibited drug use? When do you provide the training to new hires? Do you provide refresher training? If yes, how often? *Per 49 CFR 655.14, safety-sensitive employees must receive at least 60 minutes of training on the effects and consequences of prohibited drug use on the personal health, safety, and the work environment, and on the signs and symptoms that may indicate prohibited drug use.* [Reviewer, examine training records.]	

21. Have supervisors who are designated to determine whether reasonable suspicion exists to require a safety-sensitive employee to undergo alcohol and/or drug-testing been provided the following training?
 	
   a) At least 60 minutes of training on the physical, behavioral, speech, and performance indicators of probable alcohol misuse.
 	
   b) At least 60 minutes of training on the physical, behavioral, and performance indicators of probable drug use.
 	
Do you provide refresher training? If yes, how often?
 	
Per 49 CFR 655.14, supervisors and/or company officers authorized by the employer to make reasonable suspicion determinations shall receive at least 60 minutes of training on the physical, behavioral, and performance indicators of probable drug use and at least 60 minutes of training on the physical, behavioral, speech, and performance indicators of probable alcohol misuse.	

22. Who maintains the drug and alcohol-testing program records? Are they maintained in a secure location with controlled access? *Subrecipients must maintain drug and alcohol-testing records in a secure location with controlled access.*	

23. Are the following records maintained for only 1 year:
 	
   a) Alcohol test results less than 0.02
 	
   b) Verified negative drug test results	

24. Are the following records maintained for only 2 years:
 	
   c) Collection process for alcohol-testing except calibration of evidentiary breath testing devices
 	
   d) Collection process for drug testing
 	
   e) Alcohol education and training records
 	
   f) Drug education and training records	

25. Are the records from previous employers kept for only 3 years?	

26. Are the following records maintained for only 5 years:
 	
   a) Alcohol test records with alcohol readings of 0.04 or greater
 	
   b) Drug-test records with verified positive results
 	
   c) Refusals
 	
   d) Referrals of employees for alcohol misuse or drug use
 	
   e) Employee compliance with recommendations of the SAP for drug use and/or alcohol misuse, including results of return-to-duty and follow-up testing
 	
   f) MIS reports	

27. Have the annual calendar year management information system (MIS) reports been filed with MDT? Were the reports filed by the February due date? *Reviewer, please list the reports since the last review that are on file with the state. Note whether the reports were submitted on time and any problems with the reports.*	
28. Does the collection site submit the employer copy of the custody and control form (CCF) and alcohol testing form (ATF) to you within 24 hours or the next business day of the collection? Are the employer copies of the CCF and ATF reviewed for completeness and accuracy? If there is a problem with a form, do you follow up with the collection site in writing and ask for documentation of the corrective action? *Per 49 CFR 40.73, the collection site must submit the employer copy of the CCF and ATF to the designated employer representative within 24 hours or during the next business day. Per 49 CFR 40.255, the collection site must transmit the result of the alcohol test to the DER immediately in a confidential manner.*	
29. Do you obtain and review for completeness and accuracy the employer copies of the custody and control forms and alcohol testing forms? If you find a problem with a form, do you follow up with the collection site in writing and ask for documentation of the corrective action?	

30. How are vendors (e.g., collection sites, MROs) monitored to ensure compliance with program requirements? *Monitoring may include conducting periodic mock collections, observing tests, investigating reports by employees of flawed procedures, requiring detailed explanations for cancelled tests, and providing vendors with copies of USDOT and FTA handbooks and procedural manuals.*	

CHARTER BUS

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

1. Do you provide transportation for "program purposes," that is, service that serves the needs of human service agencies or elderly persons, persons with disabilities, or low-income persons? If yes, please describe. *For Sections 5310 and 5311, transportation for "program purposes," that is, that serves the needs of either human service agencies or seniors, persons with disabilities, or low-income persons, is exempted from the regulation.*	
2. Do you operate charter service? If **yes**, describe the charter service provided and answer the balance of the questions in this section. If **no**, go on to the School Bus section. If you are **not sure**, describe the service in question and the reviewer will determine whether the service was charter service and go through the balance of the questions with you during the site visit. [Reviewer, please review the most recent audit on file with the state for any charter revenue. Review service brochures to see if the subrecipient promotes charter service.] *Charter service is defined as:* *Transportation provided at the request of a third party for the exclusive used of a bus or van for a negotiated price; or* *Transportation provided to the public for events or functions that occur on an irregular basis or for a limited duration and:* ▪ *A premium fare is charged that is greater than the usual or customary fixed route fare; or* ▪ *The service is paid for in whole or in part by a third party.*	
3. Under what exception is the charter service operated? (**Please refer to the Charter Bus Exceptions and Requirements table**.) Did you follow the procedures required by the exception? Please have the paperwork ready for the site visit documenting that you have complied with the procedures.	

4. Have you reported charter service quarterly? *Required for service provided under the GO, QS, LE and WN exceptions. Please refer to the Charter Bus Exceptions and Requirements table.*	
5. Do you maintain charter records for at least three years? Are these procedures documented? *Charter records must be maintained for at least 3 years.*	
6. If you use charter profit for local match, how do you determine profit?	
7. Have any complaints been filed alleging that the charters are in violation of the FTA regulations?	
8. Is charter service provided with locally owned vehicles? If yes, are the vehicles maintained or stored in an FTA-funded facility? *Charter service using locally-owned vehicles that are maintained or stored in an FTA-funded facility must comply with the charter regulations. If maintained or stored in a non-FTA-funded facility, the service must be completely segregated from FTA-funded service.*	

CHARTER BUS EXCEPTIONS AND REQUIREMENTS

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

Exception	Procedure
Exception 604.9 – When no registered charter provider responds to a notice posted on the FTA charter website (**WN**): 1. Within 72 hours for charter service requested to be provided in less than 30 days, or 2. Within 14 calendar days for charter service requested to be provided in 30 days or more.	Include the in the e-mail notice sent to the list of registered charter providers: 1. Customer name, address, phone number, and e-mail address (if available); 2. Requested date of service; 3. Approximate number of passengers 4. Type of equipment requested, bus(es) or van(s); 5. Trip itinerary and approximate duration; and 6. The intended fare to be charged for the service. If an "undeliverable" notice is received in response to its e-mail notice, fax the notice. If service is provided, record the following information: 1. The group's name, address, phone number, and email address 2. Date and time of service 3. Number of passengers 4. Origin, destination, and trip length (miles and hours) 5. Fee collected, if any 6. Vehicle number (example, bus 102) Retain all records (email sent, undeliverable notice, facsimile, record of charter) for three years.
Exception 604.10 – Agreement with registered charter providers If a new charter provider registers in the geographic service area, may continue to provider charter service for 90 days without an agreement with the newly registered charter provider. Any parties to an agreement may cancel at any time after providing a 90-day notice.	Retain records of the agreements for three years.
Exception 604.11 – Petitions to the Administrator for: 1. Events of regional or national significance 2. Hardship (<200,000 population only) 3. Unique and time sensitive events that are in the public interest	For an event of regional or national significance, the petition shall describe how registered charter providers were consulted and will be utilized, include a certification that the recipient has exhausted all the registered charter providers in its service area, and submit the petition at least 90 days before the first day of the event. For a hardship request, the exception must be for deadhead time that exceeds total trip time from initial pick-up to final drop-off, including wait time and shall describe how the minimum duration would create a hardship on the group requesting the charter. For a unique and time sensitive event, the petition shall describe why the event is unique and time sensitive and would be in the public's interest. Maintain records of the charters for three years.
Note: Charter service hours include: time spent transporting passengers, time spent waiting for passengers and "deadhead" hours.	

SCHOOL BUS

Subrecipients are prohibited from providing exclusive school bus service unless the service qualifies under an allowable exemption and is approved by the FTA Administrator. In no case can federally funded equipment or facilities be used to provide exclusive school bus service. Head Start transportation is considered human service transportation, not school bus service.

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

SERVICE PLANNING AND MARKETING

SERVICE ELIGIBILITY

Section 5311 funds must be used for public transportation projects and intercity projects in nonurbanized areas. Section 5310 funds must be used to support the special transportation needs of elderly individuals and individuals with disabilities.

1. What types of contract and subscription service do you provide? With whom? Do the contracts and subscription service interfere with the provision of public transit? Have you had to deny public transit trips because the contracts and subscription service utilized all available capacity? If yes, how often?	
2. Do the ridership data from the last quarterly reports indicate that the subrecipient identifies and is successful in attracting: a) General public riders (5311 recipients)	
b) Seniors and persons with disabilities (5310 recipients)	
3. Do you provide service to the general public at least 40 hours per week? Is the service available during normal commute times? *Section 5311 service must be available to the general public at least 40 hours per week and be available during normal commute times.*	
4. Do you rank trips by trip purpose? If yes, please provide the order of priority. Does the ranking of trips discourage the general public from using the service? Have you denied service because a trip with a lower-ranked purpose could not be accommodated? If yes, how often?	

5. Are vehicles clearly identified as general public transit service? Is the agency phone number on the exterior of vehicles? Is the agency web address on the exterior of vehicles? *Vehicles must be identifiable as general public transit service.*	
6. Are the vehicles marked in any way that represents exclusive use for a specific organization or clientele? *Vehicles may not display markings that imply exclusive use for a specific organization or clientele.*	
7. Have annual updates of the marketing plan been submitted with applications? Has the plan been implemented? [Reviewer, review the annual update submitted with the application and describe the marketing plans for the year.] *Annual updates to the marketing plan must be submitted with the application and the plan must be implemented.*	
8. Does the agency answer the phone in such a way that the general public knows that it has contacted a public transit provider? Do you have a direct line for transportation or do all transportation calls go through the general receptionist?	
9. Do you provide meal delivery or other incidental services? If yes: How many meals or other incidental services do you deliver? At what times of the day? Do the services interfere with the provision of transit service? Do the incidental services bear the costs of the service? *Subrecipients may provide incidental service with FTA-funded vehicles but the service must not interfere with the provision of transit service and must bear the costs of providing the service.* *CARES Act funds can be used for the provision of essential incidental services.*	

10. Do you provide any service within an urbanized area (population > 50,000)? If yes: Please describe the service. Do you use Section 5311 assistance to support the service? How do you allocate costs between the urbanized and nonurbanized area service? *Subrecipients may not use Section 5311 assistance to provide service within an urbanized area. They may provide service to and from urbanized areas. They must have a MDT-approved methodology for allocating costs between the urban and rural service.*	

TITLE VI - NONDISCRIMINATION IN THE DELIVERY OF SERVICE

FTA prohibits discrimination on the grounds of race, color, or national origin and on the grounds of low-income status. The Montana Human Rights Act prohibits discrimination on the basis of race, creed, religion, color, national origin, age, physical or mental handicap, marital status or sex. The Governor's Executive Order No. 41-2008 prohibits discrimination on the basis of ancestry, social origin or condition, culture and sexual orientation.

1. Have any complaints concerning discrimination in the delivery of service been received since the last review? If yes, how were the complaints identified and resolved? Did you report the complaints to MDT within 24 hours of receipt of the complaint? *Title VI complaints must be reported to MDT within 24 hours of receipt of the complaint.*	
2. The reviewer will ensure that the Title VI notice is posted as discussed in the Title VI plan on file with MDT. *At a minimum, subrecipients shall disseminate this information to the public by posting a Title VI notice on the agency's website and in the public areas of the agency's office(s), including the reception desk, meeting rooms, etc. Subrecipients should also post Title VI notices at stations or stops, and/or on transit vehicles.*	
3. Have employees received the training in providing timely and reasonable language assistance to LEP populations? *FTA requires subrecipients to train employees in providing timely and reasonable language assistance to LEP populations.*	
4. Since you submitted your Title VI plan, have you identified any additional language assistance needs? If yes, please describe.	

PUBLIC INVOLVEMENT

Subrecipients must involve the public in service planning. An effective public involvement program addresses transit riders, the non-riding public, special populations, community leaders, and civic groups.

1. If the service has implemented substantial service or fare changes, was an opportunity for a public hearing afforded?	
2. Have any public hearings for any reason been held in the last 3 years?	
3. Were the hearings scheduled at a reasonable time and accessible place?	
4. Are hearings conducted in accordance with due process procedures and are they fair and open?	
5. Has the service adequately addressed comments that were made in the hearings?	
6. Do you have a regular and systematic way to secure contractor, public and rider input into the system (such as annual reviews, suggestion boxes, surveys, rides by management staff and governing body members to assess service and interact with the public)?	
7. Have you cultivated working relationships with community leaders? For example, are you a member of the chamber of commerce and do you attend meetings regularly? If there is a downtown or central business district (CBD) association do you meet with them periodically? Are you involved or do you periodically consult with local planning agencies and governmental units?	
8. Have you developed coalitions to support transit? If yes, please describe activities such as developing relationships with volunteer organizations. Have you used them as a source of funding or volunteers? Have you developed relationships with the league of women voters or other non-partisan advocacy groups?	

MARKETING

Subrecipients should have a marketing program that attracts riders and promotes a positive image to the community. Public information should be attractive, widely distributed, and accessible in various formats. The Division supports a statewide transit marketing program. Annual updates to the marketing plan must be submitted with the annual application.

1. How do you advertise your transit service? What media are used and how often?	
2. What group from the following list has the most knowledge and name recognition of your service? Older adults (age 60+) Youth (up to age 16) Other ages (age 16-60) Developmentally disabled Other (please specify)	
3. What other types of marketing/promotion are you doing for your transit program?	
4. Do you have a system in place to obtain information on rider and non-rider attitudes and demographics? *Good practice*	
5. Do you conduct rider satisfaction surveys? How often? When was the last survey? *Good practice*	
6. Please describe your fare structure.	
7. Is the fare policy formally adopted by the governing body based on financial and socio-economic considerations? *Good practice*	
8. Is the fare policy reviewed annually? *Good practice*	
9. When was your last fare increase?	

10. Are the public information systems complete, easy to understand and available in alternative formats?	
a. Schedules and time tables	
b. Route maps	
c. Transfer points to other routes and systems	
d. Signage and other user aides	
e. How-to-ride information	
f. Telephone information system (including a dedicated number for general public service)	
11. How and where are marketing materials (brochures, schedules) distributed?	
12. Have arrangements been made with the institutions to notify you when the racks need replenishing? *Good practice*	
13. Is there a regular schedule for replenishing the racks? *Good practice*	
14. Who maintains your website?	
15. How is website registration managed?	
16. How often do you review the website content and make changes?	
17. Are you able to make changes to your website directly or must you go through a contractor?	
18. Does the website provide information on:	
a. Hours and days of service	
b. Types of service	
c. Fares	
d. Transfer policy/charges	
e. How to plan a trip	

f. Bus schedules and maps Are bus schedules in HTML format so that they are accessible for persons who use readers? *(Good practice)*	
g. Public meetings and hearings	
h. Route and schedule changes	
i. Transit advisory committee participation and meetings	
j. Telephone number	
k. Links to other transit system websites	
l. Sign up for email or other alerts	
m. On-line comment form	
n. Protection under Title VI *(required)*	
o. How to file a compliment, complaint, or suggestion, including a Title VI complaint (*required*)	
p. How to obtain additional information on Title VI obligations *(required)*	
q. Route deviation *(required)*	
r. ADA complementary paratransit *(required)*	
19. What types of social media do you use to promote your system? Do the website and printed material list the social media symbols (Facebook, Twitter, Instagram, etc.)?	
20. Is your service on Google Transit or other travel planning service? If yes, does your website have an associated trip planner?	

PLANNING AND COORDINATION

Subrecipients must submit annual updates to the coordination plan with the application. They must coordinate to the maximum extent feasible with transportation assisted from other federal sources.

1. Reviewer, please refer to the explanation in the application and describe how the subrecipient coordinates with other transportation providers in the area. Subrecipient, since submitting your application, have any additional efforts been made to coordinate service? If yes, please describe.	
2. Are there more opportunities for coordination?	
3. What groups are represented on the local transportation advisory committee (TAC)? Are private-for-profit and private-nonprofit transportation providers represented on the TAC?	
4. Did you provide reasonable notice to transportation providers when you submitted your application?	
5. Do you have a current list of all providers of passenger transportation in your service area?	
6. Are you an active participant in your local Transportation Advisory Committee (TAC)?	
7. Are you participating in the public transit/human services transportation coordination plan effort? What initiatives have resulted from the meetings?	
8. Have you invited school districts to participate or be included in your transportation coordination efforts?	

9. Which of the following coordination activities occur?
 	
   a) Consolidated purchase of service
 	
   b) Central information center
 	
   c) Centralized dispatch
 	
   d) Planning
 	
   e) Maintenance
 	
   f) Purchasing (vehicles, parts, fuel)
 	
   g) Training
 	
   h) Management (information system, billing)
 	
   i) Marketing
 	
   j) Other (please describe)	

10. Are there more opportunities for coordinated activities?	

CORRECTIVE ACTIONS AND RECOMMENDED IMPROVEMENTS

Finding	Corrective Actions/ Recommended Improvement	Response	Response Date	Comment	Date Closed

DOCUMENTS

Documents	Comment
Legal and Governance	
Articles of Incorporation	
Bylaws	
Governing body minutes	
Governing body orientation materials	
Governing body financial reports	
"Funders" report	
Narrative/milestone history	
Control Environment	
Conflict of interest policy/code of conduct	
Technical Capacity	
Organization chart	
Business continuity/disaster recovery plan	
Document control/records retention policy	
Service provider contract	
Financial Management	
Single/financial audit	
Travel policy	
Budget procedures	
Budget	
Financial Management	
Policy governing personal use of work computers	
Procurement	
Procurement procedures	

Documents	Comment
Code of conduct	
Protest procedures	
Personnel	
Personnel manual	
EEO	
Sample job application	
Sample job posting and advertisement	
Service Provision	
Service policy/driver handbook	
Rider guide	
Complaint/comment procedures	
Passenger standards of conduct	
Suspension policy	
Maintenance	
Fleet maintenance plan	
Pre-trip checklist/driver vehicle inspection report	
Facility maintenance plan	
Title VI	
Complaint procedures	
Marketing	
Marketing plan	
Sample customer satisfaction survey	
Compilation of most recent survey results	
Sample marketing materials (schedules, brochures, ads, etc.)	
Safety and Security	

Documents	Comment
Safety plan	
Road observation report	
Accident/medical emergency procedures	
Cell phone/texting policy	
Drug and Alcohol Program	
Drug and alcohol policy	
Contract with third party administrator	
MRO training certificate	
BAT/SST training certificates	
Collector training certificates	
SAP training certificates	