

NORTHWEST ARKANSAS REGIONAL PLANNING COMMISSION

SUBRECIPIENT MONITORING GUIDE FOR FTA SECTION 5339 GRANTS

APRIL 2017
JUNE 2017

NWARPC DISCLAIMER

This notice is in accordance with the 2040 Northwest Arkansas Metropolitan Transportation Plan, the Federal Transportation Act, MAP-21, and the FAST Act in cooperation with local agencies, the Arkansas State Highway and Transportation Department, the Missouri Department of Transportation, the Federal Highway Administration, and the Federal Transit Administration. Documents are funded in part through grant(s) from the FHWA, FTA, and/or the U.S. Department of Transportation. The views and opinions of the NWARPC expressed herein do not necessarily state or reflect those of the U.S. Department of Transportation.

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The NWARPC complies with all civil rights provisions of federal statutes and related authorities that prohibit discrimination in programs and activities receiving federal financial assistance. Therefore, the NWARPC does not discriminate on the basis of race, sex, color, age, national origin, religion or disability, in the admission, access to and treatment in NWARPC's programs and activities, as well as the NWARPC's hiring or employment practices. Complaints of alleged discrimination and inquiries regarding the NWARPC's nondiscrimination policies may be directed to Celia Scott-Silkwood, AICP, Regional Planner – EEO/DBE (ADA/504/Title VI Coordinator), 1311 Clayton, Springdale, AR 72762, (479) 751-7125, (Voice/TTY 7-1-1 or 1-800-285-1131; Para llamadas en español, marque el 866-656-1842; para llamadas en inglés, marque el 711 o directamente al 800-285-1131) or the following email address: cscott-silkwood@nwarpc.org. This notice is available from the ADA/504/Title VI Coordinator in large print, on audiotape and in Braille. If information is needed in another language, contact Celia Scott-Silkwood. Si necesita información en otro idioma, comuníquese Celia Scott-Silkwood, cscott-silkwood@nwarpc.org or 479-751-7125, cuando menos 48 horas antes de la junta.

Purpose

The Northwest Arkansas Regional Planning Commission (NWARPC), as the Metropolitan Planning Organization (MPO), is responsible for the coordination of transportation planning activities in Benton and Washington County in Arkansas and a portion of McDonald County, Missouri. This geographic area, known as the Metropolitan Planning Area (MPA), includes all of the 2010 Census designated Fayetteville-Springdale-Rogers AR-MO Urbanized Area, all of Benton and Washington Counties-AR, and a portion of McDonald County-MO.

The purpose of this NWARPC Subrecipient Monitoring Guide (the Guide) is to:

- Ensure that all technical specifications and contract requirements are met by subrecipients;
- Monitor compliance with FTA requirements for the life of FTA Section 5339-funded projects that are maintained by subrecipients;
- Identify performance issues and address them in a timely manner.

Monitoring Procedure

The monitoring procedure incorporates the full cycle of the Federal Transit Administration (FTA) Section 5339 grant for subrecipient monitoring. The approach emphasizes both advising the subrecipient of the Section 5339 grant and assessing FTA compliance. The subrecipient monitoring procedure consists of the following activities:

- I. SUBRECIPIENT FUNDING AGREEMENT EXECUTION
- II. ONGOING SUBRECIPIENT MONITORING
 - A. Invoice Reviews
 - B. Annual Reporting by Subrecipient
- III. ANNUAL COMPLIANCE REVIEWS
 - A. Annual Compliance Review
 1. Compliance Review of Submitted Documents
 - a. Request Information
 - b. Review Pertinent Documentation
 - c. Preliminary Findings
 2. Onsite Review
 3. Compliance Review Report
 - a. Draft Compliance Review Report
 - b. Subrecipient Submittal of Additional Documents

- c. Subrecipient Comment
- d. Amendments to the Report
- 4. Corrective Action Monitoring
 - a. One-off Events
 - b. Completion of Corrective Actions
 - c. Corrective Action Tracking
- 5. Findings/Corrective Action Table

The specific tasks and responsibilities for each of these activities within the monitoring procedures are described below:

I. SUBRECIPIENT FUNDING AGREEMENT EXECUTION

NWARPC MPO and FTA requirements will be stated in the agreement along with the monitoring plans. At the time of agreement execution, the subrecipient will agree to comply with all of the applicable NWARPC MPO and FTA requirements and to be subject to ongoing monitoring by the NWARPC MPO as described herein.

The NWARPC MPO will maintain all pertinent information about each subrecipient including contact information, source and amount of funds, and summary project information for inclusion into required FTA reports. All relevant information relating to the oversight of each subrecipient will be maintained in such manner as to be easily and quickly identified, complete, and readily available for use.

II. ONGOING SUBRECIPIENT MONITORING

Monitoring activities will include reviewing and approving subrecipient invoices for reimbursement and developing project status information for inclusion in the quarterly Milestone Progress Report and the Federal Financial Report.

A. Invoices Review

The NWARPC MPO will review all subrecipient requests for reimbursement using the Invoice Checklist (Appendix A). This will ensure all required documents are submitted and all requests are eligible for reimbursement. Only after review and approval will invoice requests be paid by NWARPC MPO.

B. Annual Reporting by Subrecipient

The NWARPC MPO will review program progress on an annual basis. The subrecipient annual report should be submitted at the end of the fiscal year (June, submit by mid-July) and include the following areas:

- Project Schedule including original and current completion dates
- List of Inventory
- Maintenance/Preventative Maintenance Report
- Funding table for each ALI including fiscal year, original planned allocation, current estimates, actual expenditures, and remaining allocation

- Corrective Action Plan including updates for any delayed projects
- Vehicle use certification/report
- Insurance requirements

III. FORMAL COMPLIANCE REVIEW

A. Annual Compliance Review

All subrecipients will receive a Compliance Review and site visit annually.

This review will consist of the following activities:

1. Compliance Review of Submitted Documents (Initial Desk review of FTA Triennial Review Documents; Review of changes, amendments, etc. thereafter)
2. Onsite Review
3. Compliance Review Report
4. Corrective Action Monitoring
5. Findings/Corrective Action Table

All NWARPC MPO subrecipients will be reviewed in the following compliance areas, unless the compliance area is not applicable.

COMPLIANCE AREA	BASIC REQUIREMENT/POSSIBLE SUBMISSIONS FOR ANNUAL COMPLIANCE REVIEW INITIAL DESK REVIEW AND SITE VISIT(S) (based on 2017 Triennial Review Guidance)
Financial Management and Financial Capacity	The subrecipient must demonstrate the ability to match and manage FTA grant funds, cover cost increases and operating deficits, cover maintenance and operational costs for FTA funded facilities and equipment, as well as conduct and respond to applicable audits. Submit: <ul style="list-style-type: none"> • Accounting records for projects and/or auditor's certification of year-end financial statements.
Technical Capacity	The subrecipient must be able to implement FTA-funded projects in accordance with the grant application, Master Agreement, and all applicable laws and regulations, using sound management practices. NWARPC may evaluate technical capacity using criteria such as staff levels, staff training and experience, level of documentation of procedures, ability to submit required reports correctly and on time, ability to maintain project equipment, and ability to comply with FTA and grantee requirements. Submit: <ul style="list-style-type: none"> • FFATA to NWARPC to file with FTA Regional Office or FSRS.gov. • Grant close-out schedule. • Information on the sources and amounts of local match available for projects and the anticipated sources and amounts of operating revenue and subsidies for continued operation and maintenance of equipment or facilities.
Maintenance	Subrecipients must keep federally funded vehicles, equipment, and facilities in good operating condition. Subrecipients must keep ADA accessibility features on all vehicles, equipment and facilities in good operating order. Submit:

	<ul style="list-style-type: none"> • Maintenance plans. • Annual maintenance/preventative maintenance reports. • Manufacturer’s recommended preventative maintenance schedules for vehicles. • PM inspection records to include 1) Directly operated vehicles, 2) ADA accessibility features. • Warranty items to include 1) list of vehicles and equipment under warranty, 2) warranty recovery program and summary of warranty claims. • Make maintenance staff available during site visit.
ADA	<p>Titles II and III of the Americans with Disabilities Act of 1990 (ADA) provide that no entity shall discriminate against an individual with a disability in connection with the provision of transportation service. The law sets forth specific requirements for vehicle and facility accessibility and the provision of service, including complementary paratransit service.</p> <p>Submit:</p> <ul style="list-style-type: none"> • Invoice or other paper work indicating vehicles are ADA compliant. • Vehicle procurement specifications. • Documentation of good faith efforts to obtain used accessible vehicles. • Documentation of equivalent service for inaccessible vehicles acquired. • Training documentation. • Route-deviation service documentation. • ADA complementary paratransit service documentation. • Complaint procedures and a yearly complaint Report. • (Service provisions and maintenance of accessibility features – site visit.)
Title VI	<p>The subrecipient must ensure that no person shall, on the grounds of race, color, or national origin, be excluded from participating in, or be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance without regard to whether specific projects or services are federally funded. The subrecipient must ensure that federally supported transit services and related benefits are distributed in an equitable manner. Submit:</p> <ul style="list-style-type: none"> • Title VI Program including a LEP/LAP and equity analysis. • Documentation of public involvement. • Title VI notification and translation. • Complaint report. • (Review of marketing materials and postings on vehicles and public facilities – site visit.)
Procurement	<p>Subrecipients use their own procurement procedures that reflect applicable state and local laws and regulations, provided that the process ensures competitive procurement and the procedures conform to applicable federal law, including 49 CFR Part 18 (specifically Section 18.36) and FTA Circular 4220.1F, “Third Party Contracting Guidance.”</p> <p>Submit:</p> <ul style="list-style-type: none"> • Subrecipient agreement or contract including procurement requirements, such as evidence of analysis of potential conflict of interest and/or WRITTEN PROTEST PROCEDURES. • Provide documentation that the procurement requirements have been met. • Change order procedures.

	<ul style="list-style-type: none"> • The above applies to only those procurements that the MPO has oversight of.
DBE	<p>The subrecipient must comply with 49 CFR Part 26 to ensure nondiscrimination in the award and administration of DOT-assisted contracts. Subrecipients also must create a level playing field on which DBEs can compete fairly for DOT-assisted contracts.</p> <p>IF APPLICABLE Submit:</p> <ul style="list-style-type: none"> • DBE program and overall goal as shown on the semi-annual Uniform Report of DBE Awards or Commitments and Payments. • Submit documentation that subrecipient is maintaining their commitment to use the DBEs noted in the contract award documents for the types and dollar amount of work detailed. • (During site visit provide contracting records for review to ensure DBEs are actually performing the stated work.)
Legal	<p>The subrecipient must be eligible and authorized under state and local law to request, receive, and dispense FTA funds and to execute and administer FTA-funded projects. Recipients must comply with Restrictions on Lobbying requirements.</p> <p>Submit:</p> <ul style="list-style-type: none"> • The required documentation of designation that is on file with FTA. • Submit documentation that subrecipient has notified FTA of changes in local or state laws or that subrecipient has pending legislation. • Submit a copy of the filed OMB Standard Form LLL and/or a quarterly report.
Satisfactory Continuing Control	<p>The subrecipient must ensure that FTA-funded property will remain available to be used for its originally authorized purpose throughout its useful life until disposition.</p> <p>Submit:</p> <ul style="list-style-type: none"> • Annual List of Inventory. • Documentation of disposition of FTA-funded property (use FTA definition of “end of useful life”). • Property records of federally funded equipment (send sample page). • Evidence of inventory reconciliation. • Proof of FTA-approved incidental uses and show procedures for obtaining prior FTA approval for future incidental uses.
Planning/Program of Projects	<p>Planning: The subrecipient must participate in the transportation planning process in accordance with FTA requirements, MAP-21, FAST Act, and the metropolitan and statewide planning regulations. NWARPC MPO has on file the subrecipient agreement.</p> <p>Human services transportation: Subrecipients must participate in a coordinated public transit-human services transportation planning process that identifies the transportation needs of individuals with disabilities, older adults, and people with low incomes; provides strategies for meeting those local needs; and prioritizes transportation services for funding and implementation. The State has a process for involving public transit providers and/or local officials in the planning process.</p> <p>Program of Projects (POP): Each recipient of a Section 5307 grant shall develop, publish, afford an opportunity for a public hearing on, and submit for approval, a POP. NWARPC MPO has an adopted Public Participation Plan; public notices for the TIP have an explicit statement that public notice of public participation activities and time established for public review and comments on the TIP will satisfy the POP requirements.</p>
Public Comment	<p>Section 5307 subrecipients are expected to have a written, locally developed process for soliciting and considering public comment before raising a fare or carrying out a major transportation service reduction.</p> <p>Submit:</p> <ul style="list-style-type: none"> • Written policy for soliciting and considering public comments prior to a fare increase or major service reduction that addresses fare increases, defines a major service reduction, describes how public comment will be solicited, and specifies how comments will be

	considered.
Half Fare	<p>For fixed route service supported with Section 5307 assistance, fares charged elderly persons, persons with disabilities or an individual presenting a Medicare card during off peak hours will not be more than one half the peak hour fares.</p> <p>Submit:</p> <ul style="list-style-type: none"> • A plan and schedule for implementing a half fare program and documentation that the program has been implemented. • Submit a plan for making passengers aware of any need for a special identification card and enabling ID cards to be easily obtained, along with documentation that the plan has been implemented, and that it accepts a Medicare card as proof of eligibility for the half fare program.
Charter Bus	<p>Subrecipients are prohibited from using federally funded equipment and facilities to provide charter service if a registered private charter operator expresses interest in providing the service. Subrecipients are allowed to operate community based charter services excepted under the regulations.</p> <p>Submit:</p> <ul style="list-style-type: none"> • Documentation, along with a plan for ensuring that the subrecipient follows advisory opinions and cease and desist orders from the Office of Chief Counsel – UNLESS subrecipient qualifies for Exemptions and Exceptions. • Written documentation of type of charter service provided by subrecipient and under what exception(s) it is provided and any and all information required to be recorded if operating a charter service. • Grant agreement showing the required charter bus clause.
School Bus	<p>Subrecipients are prohibited from providing exclusive school bus service unless the service qualifies and is approved by the FTA Administrator under an allowable exemption. Federally funded equipment or facilities cannot be used to provide exclusive school bus service. School tripper service that operates and looks like all other regular service is allowed.</p> <p>Submit:</p> <ul style="list-style-type: none"> • Documentation stating the subrecipient is not operating exclusive school bus service not approved by the Administrator.
Security	<p>Subrecipients must annually certify that they are spending at least one percent of such funds for transit security projects or that such expenditures for security systems are not necessary.</p> <p>Submit:</p> <ul style="list-style-type: none"> • A plan for meeting the one percent expenditure requirement and report on implementation of this plan. • A plan for documenting the amount of formula funds spent on transit security. • An explanation and adequate documentation on why the expenditure is not necessary.
Drug free workplace and drug and alcohol program	<p>Drug free workplace: All subrecipients are required to maintain a drug-free workplace for all employees and to have an ongoing drug-free awareness program.</p> <p>Drug and Alcohol Program: Subrecipients receiving Section 5307, 5309 or 5311 funds that have safety-sensitive employees must have a drug and alcohol testing program in place for such employees.</p> <p>Submit:</p> <ul style="list-style-type: none"> • Drug and Alcohol-Free Policy and Awareness Program. • Confirm an adopted FTA drug and alcohol testing program for safety-sensitive employees. • Confirm annual random testing rate for drugs at 25% and for alcohol at 10% of the number of safety sensitive employees from the third-party administrator. • Any drug/alcohol review reports from agencies such as FTA or AHTD.

	<ul style="list-style-type: none"> • The yearly audit/review undertaken by the subrecipient of the 3rd party administrator.
EEO	<p>The subrecipient must ensure that no person in the United States shall on the grounds of race, color, religion, national origin, sex, age, or disability be excluded from participating in, or denied the benefits of, or be subject to discrimination in employment under any project, program, or activity receiving federal financial assistance under the federal transit laws. (Note: EEOC's regulation only identifies/recognizes religion and not creed as one of the protected groups.) A formal EEO program is required of any grantee that both employs 50 or more transit-related employees (including temporary, full-time, or part-time employees) AND 1) requests or receives in excess of \$1M in capital and/or operating assistance or 2) requests or receives in excess of \$250,000 in planning assistance in the previous Federal fiscal year.</p> <p>Submit: if applicable</p> <ul style="list-style-type: none"> • EEO Program (NWARPC will review and compare to FTA C 4704.1A) • EEO reports annually – to include complaints and/or EEO-related lawsuits filed against the subrecipient.

1. Compliance Review of Submitted Documents

A desk review to determine compliance of submitted documents will be undertaken annually (at the beginning of the fiscal year) for FTA Section 5339 projects.

The **first desk review** should assess pertinent documentation. **Thereafter only new or amended policies and procedures need to be reviewed.** The first desk review should occur within the first year of the funding agreement, if possible.

The level of detail in the first desk review will depend on the determined monitoring needed for the subrecipient. For NWARPC MPO public transit subrecipients, that are themselves FTA direct grant recipients, and as such, have low levels of monitoring need, only documents as identified in the above table and/or requested by FTA at Triennial Review will be reviewed. Additionally, after the first desk review, only new or amended policies and procedures will be reviewed.

In the first desk review the NWARPC MPO will:

- a. **Request Information:** The NWARPC MPO will request relevant documents from subrecipients for the compliance areas, possibly to include documents submitted to FTA for the most recent Triennial Review and the FTA Final Triennial Review Report. The subrecipient will be given 45 business days after receipt of the letter requesting information to collect and submit the required documents. (JUNE 28, 2017 LETTER SENT; SEPTEMBER 1, 2017 INFORMATION DUE)
- b. **Review Pertinent Documentation:** The NWARPC MPO will review the documentation. Additional documentation or clarification requests may be required.
- c. **Preliminary Findings:** During the review, the NWARPC MPO will check subrecipient documents against FTA requirements and tabulate the findings. This will help to identify the preliminary findings and ensure all areas are covered.

2. **Onsite Review:** The NWARPC MPO will coordinate the onsite review. The onsite review will concentrate on performance gaps identified during the desk documentation review. The onsite review may include:
 - Observing the condition of facility and equipment;
 - Reviewing preventive maintenance records for a sample of federally funded revenue vehicles and facilities;
 - Verifying that the subrecipient has equipment control procedures; and
 - Reviewing procurement files and other documentation to confirm that the subrecipient has effective and comprehensive oversight procedures.
3. **Compliance Review Report:** The Compliance Review Report will be drafted by NWARPC MPO based on the findings, listing any deficiencies discovered, and including any corrective actions required.
 - a. **Draft Compliance Review Report:** Based on the findings noted in the desk review and the site visit, the NWARPC MPO will develop a report indicating any performance gaps identified in the relevant compliance areas as a result of the review. The draft report will be sent to the subrecipient no later than 30 business days after the due date for the requested information (see 1a. above).
(OCTOBER 17, 2017 DUE DATE FOR NWARPC TO SEND DRAFT COMPLIANCE REVIEW REPORT TO TRANSIT AGENCIES)
 - b. **Subrecipient Submittal of Additional Documents:** Between the site visit and date of the draft report the subrecipient can submit to NWARPC MPO documentation that will be considered in the draft report. Documentation can take two forms:
 - If the documentation provides clarification that the subrecipient was compliant at the time of the site visit, reference to the finding should be removed.
 - If the documents provide evidence that a finding has been corrected since the site visit, the finding should be listed in the draft report, but noted as closed.
 - c. **Recipient Comment:** The subrecipient will have 15 business days after receipt of the draft report in which to comment.
(NOVEMBER 15, 2017 DUE DATE FOR TRANSIT AGENCIES TO COMMENT ON DRAFT REPORT)
 - d. **Amendments to the Report:** Amendments to the Compliance Review Report can be agreed to by NWARPC MPO and the subrecipient where necessary.
 - e. **Final Compliance Review Report:** The NWARPC MPO will provide the Final Compliance Review Report to the subrecipient within five business days after receipt of subrecipient comments. (NOVEMBER 22, 2017 DUE DATE FOR NWARPC TO SEND THE FINAL COMPLIANCE REVIEW REPORT TO TRANSIT AGENCIES)
4. **Corrective Action Plan and Monitoring:** The preliminary findings of the deficiency will be distributed by NWARPC MPO and discussed with the subrecipient along with proposed corrective actions and milestones for completion. The subrecipient should advise if any comments have been misstated or if there may be obstacles to the implementation of corrective actions. Corrective actions could include developing new policies and procedures, training staff, and monitoring of staff performance to ensure compliant policies are followed. Corrective actions should be specific, measurable, and assignable to the subrecipient and ensure the deficiency is removed.

The timescale given for the corrective action should be realistic, but enable the deficiency to be removed as quickly as possible.

- a. **One-off Events:** Some findings may be historic one-off events, for example not completing an equity analysis for a past fare or service change. As it is too late to undertake the analysis as the change has occurred, the subrecipient should instead be asked to submit procedures ensuring the requirement is not missed in the future. If this is done, the finding would not be carried in future compliance reviews.
- b. **Completion of Corrective Actions:** All corrective actions should be completed within 45 business days of the date of receipt of the final Compliance Review Report. (JANUARY 25, 2018 DUE DATE FOR TRANSIT AGENCIES TO COMPLETE THE CORRECTIVE ACTIONS)
- c. **Corrective Action Tracking:** The NWARPC MPO will be responsible for tracking the status of all corrective actions and determining when all corrective action requirements have been met within the agreed timeframe. (A Subrecipient Compliance Checklist for NWARPC MPO tracking of corrective actions is in Appendix A.)

5. **Findings/Corrective Action Table included in Compliance Review Report:** The table below indicates the headings used to document findings and an example finding:

Compliance Area	Finding	Deficiency	Corrective Action	Response Date
Financial Management & Capacity	Finding	No existing financial plan.	The subrecipient must submit a multi-year financial plan.	10/17/2014

- **Findings can take a number of forms:**
 - **'No finding':** Subrecipient documentation meets FTA requirements.
 - **'Finding':** Subrecipient is missing documentation or the documentation provided is missing key FTA requirements.
 - **'Not Applicable':** An area can be deemed not applicable if, after an initial assessment, the subrecipient does not conduct activities for which the requirements of the respective area would be applicable.
- **Each finding will be accompanied by a corrective action** that must be completed by the subrecipient to bring the project into compliance with FTA requirements. The corrective actions, along with timescales for completion, form a corrective action plan which the subrecipient will be monitored on.

APPENDIX A

OVERSIGHT CHECKLIST FOR USE BY NWARPC MPO IN TRACKING SUBRECIPIENT COMPLIANCE WITH FTA REQUIREMENTS – SECTION 5339 GRANT

SUBRECIPIENT NAME: _____

REVIEWER'S NAME: _____

DATE OF REVIEW: _____

NOTES:

APPROVAL BY EXECUTIVE DIRECTOR: _____

DATE: _____

I. CHECKLIST OF GENERAL ON-SITE ITEMS (FOR USE BY NWARPC) MAY INCLUDE THE FOLLOWING:		NOTES/CORRECTIVE ACTION & DUE DATE	
Observing the condition of facility and equipment by NWARPC staff	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
Reviewing preventative maintenance records for a sample of federally funded revenue vehicle and facilities by NWARPC staff	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
Verifying that the subrecipient has equipment control procedures by NWARPC staff	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
Reviewing procurement files and other documentation to confirm that the subrecipient has effective and comprehensive oversight procedures by NWARPC staff	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		

SUBRECIPIENT NAME: _____

REVIEWER'S NAME: _____

DATE OF REVIEW: _____

NOTES:

II. CHECKLIST – INVOICE INFORMATION (FOR USE BY NWARPC) AS PART OF THE ON-SITE VISIT (MAY REQUIRE ADDITIONAL CHECKLISTS)		NOTES/CORRECTIVE ACTION & DUE DATE	
a. Subrecipient Number	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
b. Invoice Number and Date	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
c. Invoice Value	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
d. Actual Local Match	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
e. Payments to Date	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
f. Payments Terms	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		

SUBRECIPIENT NAME: _____

REVIEWER'S NAME: _____

DATE OF REVIEW: _____

NOTES:

III. CHECKLIST – SUPPORTING DOCUMENTATION FOR INVOICES (FOR USE BY NWARPC) AS PART OF THE ON-SITE VISIT		NOTES/CORRECTIVE ACTION & DUE DATE	
a. Project Description	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
b. Project Location	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
c. Vendor / Contract Invoices	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
d. Cancelled Checks or Proof of Payment with Payment Date	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		

SUBRECIPIENT NAME: _____

REVIEWER'S NAME: _____

DATE OF REVIEW: _____

NOTES:

IV. CHECKLIST – SUBRECIPIENT MAINTENANCE/PROCUREMENT ITEMS (FOR USE BY NWARPC) AS PART OF THE ON-SITE VISIT			NOTES/CORRECTIVE ACTION & DUE DATE	
a. Submitted documentation substantiating compliance with subrecipients own Maintenance Plan.	(M1)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
b. Submitted documentation showing Manufacturer's recommended preventative maintenance schedule for buses.	(M2)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
c. Submitted preventative maintenance records to include: i. Directly operated vehicles ii. ADA accessibility features.	(M3)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
d. Submitted Warranty items to include: i. List of vehicles and equipment under warranty ii. Warranty recovery program and summary of warranty claims.	(M4)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
e. Submitted Subrecipient Agreement or contract including PROCUREMENT REQUIREMENTS , such as evidence of analysis of potential conflict of interest and/or WRITTEN PROTEST PROCEDURES.	(P1)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		

SUBRECIPIENT NAME: _____

REVIEWER'S NAME: _____

DATE OF REVIEW: _____

NOTES:

V. CHECKLIST – ANNUAL REVIEW OF SUBMITTED DOCUMENTS (FOR USE BY NWARPC) AS PART OF THE ANNUAL DESK REVIEW						
Area	FILE	Requirements/Documents	Completed		Corrective Action	Due Date
			Yes	No		
Financial Mgmt & Financial Capacity	(F1)	Accounting Records for projects; and/or				
		Auditor's certification				
Technical Capacity	(TC1)	FFATA – NWARPC to file w/FTA Region Office				
		Grant Close-out Schedule				
ADA Compliance	(ADA1)	Provides accessible facilities and vehicles – provide invoice or other paper work indicating vehicles are ADA compliant				
	(ADA2)	ADA complementary paratransit service documentation				
	(ADA3)	Addresses Complaints – yearly complaint report				
Title VI	(T1)	Provides Title VI program including a LAP and equity analysis and Ensures public notice – documentation				
	(T2)	Review Title VI marketing materials and postings on vehicles and public facilities (site visit)				
	(T3)	Addresses Complaints – yearly complaint report				

Area		Requirements/Documents	Completed		Due Date
			Yes	No	
DBE Compliance if applicable	(DBE1)	Submits timely and accurate annual data – provide the semi-annual Uniform Report of DBE Awards form or Commitments and Payments			
	(DBE2)	Provides contracting records for review to ensure DBEs are actually performing the stated work			
Legal	(L1)	Submits a copy of the filed OMB Standard Form LLL			
Satisfactory Cont. Control	(SCC1)	Provides an Annual List of Inventory			
Public Comment	(PC1)	Provides written policy for soliciting and considering public comments – addresses fare increase, defines a major service reduction, describes how public comment will be solicited, and specifies how comments will be considered			
Half Fare	(HF1)	Provides a plan for making passengers aware of any need for a special identification card and enabling ID card to be easily obtained, along with documentation that the plan has been implemented, and that it accepts a Medicare card as proof of eligibility for the half fare program			
Charter Bus	(CB1)	Submits written documentation of type of charter service provided by subrecipient and under what exception(s) it is provided and any and all information required to be recorded if operating a charter service			
School Bus	(SB1)	Provides documentation stating the subrecipient is not operating exclusive school bus service not approved by the FTA Administrator			
Security	(S1)	An explanation and adequate documentation on why the expenditure is not necessary OR A plan for meeting the one percent expenditure requirement and report on implementation of this plan			

Area		Requirements/Documents	Completed		Corrective Action	Due Date
			Yes	No		
Drug and Alcohol	(DA1)	Submits Drug and Alcohol-Free Policy and Awareness Program				
	(DA2)	Submits the most recent federal Drug and Alcohol Review Report				
	(DA3)	Submits the yearly audit/review undertaken by the subrecipient of the third-party administrator				
EEO Plan	(EEO1)	Provides EEO reports annually – to include complaints and/or EEO-related lawsuits filed against the subrecipient (if applicable)				
Overall		Maintains detailed records				
		Analyze performance				
		Implements Corrective Actions				

SUBRECIPIENT NAME: _____

REVIEWER'S NAME: _____

DATE OF REVIEW: _____

NOTES:

VI. CHECKLIST – ANNUAL REPORT SUBMITTED BY SUBRECIPIENT (FOR USE BY NWARPC) (NOTE: THE FIRST REPORT WILL BE DUE JULY 18, 2018)		COMMENTS
a. Project Schedule, including original and current completion dates	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
b. List of Inventory	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
c. Maintenance/Preventative Maintenance Report	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
d. Funding table for each ALI including fiscal year, original planned allocation, current estimates, actual expenditures, and remaining allocation	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
e. Corrective Action Plan, including updates for any delayed projects	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
f. Vehicle use certification/report	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
g. Insurance requirements	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	