



U.S. Department
of Transportation
**Federal Transit
Administration**

July 30, 2015

Robert L. Faulkner, Sr.
Chairman, Trumbull County Transit Board
160 High Street, N.W.
Warren, Ohio 44481

Re: Program Management Plan - TCTB

Dear Mr. Faulkner:

We have reviewed TCTB's Program Management Plan (PMP) for the Enhanced Mobility of Seniors and Individuals with Disabilities Program (Section 5310) submitted on February 24, 2015, and have approved it on the basis that it addresses the basic requirements provided in FTA Circulars 9070.1G. TCTB is the designated recipient for the Section 5310 Program for the Youngstown Urbanized Area. An approved PMP remains valid until FTA approves a later plan submitted by the designated recipient, or an FTA designated recipient management review results in a specific request to the designated recipient by FTA for a revised PMP, or FTA announces significant new program documentation requirements.

FTA strongly encourages the designated recipient to issue timely revisions to the PMP, particularly when information helpful to minority applicants, subrecipients, and third party contractors is involved. When the designated recipient proposes major changes to the PMP, the designated recipient should give an opportunity to comment at the minimum to potential subrecipients of assistance, potential service providers, other designated recipient agencies and representatives of other funding sources, and any relevant designated recipient associations and professional organizations.

If revisions are substantive, but not pervasive, the designated recipient may submit changes and additions in the form of page changes which can be approved by FTA and incorporated into the PMP on file. If the designated recipient changes the PMP significantly, however, the designated recipient should submit the entire revised plan to FTA for approval. The designated recipient is responsible for ensuring that FTA has a complete copy of the current PMP. The designated recipient may submit minor changes and technical corrections to FTA to update the approved plan, without the need for additional FTA approval.

If you have any questions or need further assistance regarding this matter, please contact Athena Medero of my staff. You can reach her by telephone at (312) 353-4038 or by email at athena.medero@dot.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jay Ciavarella".

Jay Ciavarella

Director, Office of Program Management & Oversight

cc: Susan Orona, FTA Region V
Athena Medero, FTA Region V

Program Management Plan
For the
Federal Transit Administration
Section 5310
Enhanced Mobility of Seniors and
Individuals with Disabilities Program

Trumbull County Transit Board
Warren, Ohio

For the
Youngstown, OH-PA Urbanized Area
Trumbull County Portion

February 24, 2015

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Trumbull County Transit Board

Program Management Plan for 5310 Funds

February 24, 2015

1. Introduction

This Program Management Plan (PMP) has been prepared by the Trumbull County Transit Board and describes TCTB's policies and procedures for administering FTA's Section 5310 – Enhanced Mobility for Seniors and Individuals with Disabilities Program in the Trumbull County portion of the Youngstown, OH-PA Urbanized Area.

The purpose of the PMP is to facilitate both TCTB management and FTA oversight by documenting the procedures and policies for administering the 5310 program. The PMP includes TCTB's program objectives, policies, procedures, and administrative requirements. This PMP will also serve as FTA's basis for management reviews of the programs. Finally, the PMP provides public information on TCTB's administration of the 5310 program.

The 5310 program seeks to improve mobility for seniors and individuals with disabilities, by removing barriers to transportation services and expanding the transportation mobility options available. Toward this goal, FTA provides financial assistance for transportation services planned, designed, and carried out to meet the special transportation needs of seniors and individuals with disabilities in all areas—urbanized, small urban, and rural. The program requires coordination with other Federally-assisted programs and services in order to make the most efficient use of Federal resources.

2. Program Goals and Objectives: The program goals and objectives of the Trumbull County Transit Board (TCTB) 5310 Program include enhancing mobility for seniors and persons with disabilities by providing funds for programs to serve the special needs of transit-dependent populations beyond traditional public transportation services. Section 5310 funds will be used for transportation investments that provide services above what is required for the ADA. Section 5310 funds will be invested in transportation options for elders and people with disabilities that will foster independent and productive lives, strengthen community connections, and strive for continual improvement of transportation services through coordination, innovation, and community involvement.

The philosophy underlying the role of TCTB as designated recipient for 5310 funds in Trumbull County, Ohio is to increase transportation options for seniors and individuals with disabilities through the coordination of the efforts and resources of public transit agencies, human services agencies and private providers of public transportation services. In doing this, it is among TCTB's goals with the 5310 Program to improve mobility for seniors and individuals with disabilities, by removing barriers to transportation services and expanding the transportation mobility options available.

TCTB will further encourage the goal of coordination through direct involvement of agencies, private companies and individuals, sharing of information and best practices, promoting referrals

among agencies and coordinated efforts to secure local, state and federal funds to provide these services. Efforts will be made to avoid duplication of service and to address gaps in service by encouraging coordination of existing resources and cooperative efforts to secure additional resources. Efforts will be made to ensure that projects funded through the 5310 program are sustainable, in the event that FTA 5310 funding becomes unavailable at a future date. All projects will be selected in a fair and equitable manner and will be based on the locally-developed transportation coordination plan.

3. Roles and Responsibilities. The Trumbull County Transit Board (TCTB) is a designated recipient of Section 5310 funds, along with Western Reserve Transit Authority and the City of Sharon PA (for Shenango Valley Shuttle Service in Mercer County, PA) in the Youngstown, OH-PA Urbanized Area. Funds are distributed among the three recipients by agreement.

As the designated recipient for Trumbull County in the Youngstown, OH-PA Urbanized Area, TCTB is responsible for overseeing and administering the 5310 Program in Trumbull County.

4. Coordination. TCTB serves as a point of coordination for inter-agency, inter-provider activities related to the delivery of elderly and disabled transportation services.

TCTB will be the lead agency ensuring that the fair and equitable selection process emphasizes coordination at all levels to provide enhanced transportation services. As Designated Recipient, TCTB will work with 5310 project sponsors to share information and create opportunities for coordination through a TCTB Transportation Coordination Stakeholder Committee and TCTB's One-Call Transportation Center.

TCTB will work with agencies and others who participate in its transportation coordination plan update project to maintain and expand the database of agencies and individuals involved in transportation coordination planning.

TCTB seeks common ground between transportation providers, consumers and social service agencies in the implementation of coordinated transportation by using mobility management to maximize resources to meet identified gaps in current services and all opportunities to coordinate services.

5. Eligible Sub-recipients. TCTB is fully eligible to apply for and solely use Section 5310 funds to carry out the goals and objectives herein. Optionally, other entities may be considered eligible sub-recipients under federal guidelines for the 5310 Program as determined to be eligible for funding by TCTB. Eligibility requirements will mirror the Federal eligibility requirements. Sub-recipients may include: duly formed private non-profits, government authorities, and operators of public transportation services, including private providers of public transportation. If it is determined that a project recipient will contract for goods and services, the entity receiving the funds must follow Federal Transit Administration (FTA) procurement procedures in a separate process, if not already under contract to TCTB resulting from a process that complied with Federal Transit Administration (FTA) procurement procedures.

6. Local Share and Local Funding Requirements. Matching funds for the Section 5310 Program may be provided in cash or in-kind. TCTB will follow federal guidelines for determining required project local matching share. The local policy will mirror the federal policy. During the application process, applicants will be required to specifically identify the source of match funds. Matching funds may include local tax revenue, private foundation funds, private sector contributions, and non-DOT federal funds including, but not limited to: TANF, Agency on Aging Title III B, Medicaid, Veterans' Care, and Vocational Rehabilitation funds intended to support transportation. Individual project sponsors will be responsible for securing the project participation and local match commitments. TCTB will verify that the proposed match is legitimate under federal policy and is within the scope of the proposed project.

TCTB will ensure that expenditure of other federal funds for transportation outside of the scope of this project cannot be applied as credit for local match in 5310 projects.

7. Project Selection Criteria. Project selection for the Section 5310 program is done by TCTB using an extensive public process, cooperation with stakeholders, including elders and people with disabilities and the locally-developed transportation coordination plan. The stakeholder group is the TCTB Transportation Coordination Stakeholder Committee. All meetings are conducted in public. Meetings are advertised in the Trumbull County Tribune, a general circulation newspaper.

TCTB shall maintain a list of interested parties that will be contacted e-mail about each public meeting. The list included TCTB board members, private transportation providers, members of social service agencies' aging and disability advisory committees, school transitional programs, physical therapists, hospital transportation coordinators, aging and disability agency staff, mental health agency staff, non-profit agencies serving elders and people with disabilities, organizations brokering services to people with developmental disabilities, vocational rehabilitation agencies and services, housing facilities for seniors and people with disabilities, rehabilitation centers, medical facilities.

Projects selected must be consistent with the coordinated transportation plan.

The plan Vision and Guiding Tenets are:

Vision: Guide transportation investments toward a full range of options for elders and people with disabilities, foster independent and productive lives, strengthen community connections, and strive for continual improvement of services through coordination, innovation, and community involvement.

Guiding Tenets:

1. Coordinate. To make best use of service hours and vehicles, assure that services are coordinated and well organized. Assure that customer information is useful and widely provided throughout the region. Work with others to achieve results.

2. *Innovate*. Increase options available to E&D customers by providing innovative, flexible, attractive and cost-effective alternatives to standard fixed route buses, rail and paratransit. Expand outreach and education on how to use services.

3. *Involve the Community*. Include elders and people with disabilities, social services staff, private non-profit providers, and other community partners in the dialogue and decisions about services. Advisory committees working on E&D issues should have over 50% representation of elders and people with disabilities.

4. *Improve the Service Foundation*. Fixed route service frequencies and coverage in some suburban areas, as well as ways to get to the fixed routes, will need to be improved. Continually improve the total fixed route transit system including the waiting area, customer service of the operators, priority seating, security and accessibility.

5. *Integrate Land Use and Transportation Decisions*. Communicate importance of land use and transportation for E&D transportation. Seek opportunities to influence land use decisions and eliminate environmental barriers to using transit.

6. *Improve Customer Convenience*. Minimize physical and psychological impediments to using core transit services relative to other modes. Make transit system easy to understand and use. Facilitate transfers between transit services with the use of wayfinding information and high-amenity transfer facilities.

7. *Improve Safety*. Assure that real and perceived safety concerns are addressed at passenger waiting areas and on board transit vehicles. Utilize transit provider staff, volunteers and other riders to increase sense of security along with investments in physical infrastructure where appropriate.

Any and all applications are mailed to TCTB two weeks in advance of scoring. Scoring takes place by TCTB Transportation Coordination Stakeholder Committee members. Once projects are scored and ranked, adjustments are made at the scoring meeting. The consensus program is taking to the TCTB endorsement.

8. Annual Program of Projects Development and Approval Process. The Annual Program of Projects, including 5310 projects, will be submitted by TCTB to and approved by the Eastgate regional Council of Governments for inclusion in the TIP. This will help ensure that local elected officials will be involved in the ongoing coordination process.

As stated above, recommended projects will be approved by TCTB and Eastgate governing boards. TCTB will add 5310 program projects to its Annual Program of Projects and will submit project applications to FTA. Further, TCTB will execute grant contracts with FTA and execute project agreements with any project sponsors.

Coordinated Transportation Plan for Elderly and People with Disabilities (CTP) Timeline and Grant Selection Process

Section 5310 Grant Process Timeline

DRAFT

The timetable for soliciting, reviewing and approving local 5310 projects if TCTB chooses is as follows (for Federal Fiscal Years 2015):

1. Project Solicitation – April - June
 - a. TCTB publishes legal notices of 5310 funding availability, availability of application packages and deadline for project application submission
 - b. TCTB holds an open meeting for interested parties
 - c. Deadline for project application submission to TCTB
2. Project Review – July - August
 - a. Project review committee meets, completes committee review and provides questions to project applicants
 - b. Project sponsors respond to any questions posed by the Project review committee
 - c. Project review committee meets, reviews final information and recommends projects for funding
3. Project Approval – August - September
 - a. Recommended projects are reviewed with TCTB Transportation Coordination Stakeholder Committee at regular committee meeting
 - b. Resolution acting on projects adopted by TCTB at regular Board meeting
4. FTA Project Submission and Approval – October - December
 - a. Project applications submitted to TEAM
 - b. Project grant contracts executed with FTA

It is anticipated that in subsequent years, the timetable will begin approximately three (3) months earlier. This would support submission of grant applications by the end of March, for contract approval by the end of June. This timetable may be modified based on the timing of federal apportionments of Section 5310 funds to designated recipients such as TCTB.

9. Administration, Planning and Technical Assistance. TCTB will use Section 5310 funds for administration, planning or technical assistance as appropriate. TCTB will use 10 percent of 5310 funding, as permitted by FTA guidelines, for administration, planning and technical assistance in managing 5310 funding and project completion.

TCTB will use this funding for staff salaries, general administrative and overhead costs, office supplies and related costs associated with managing of project applications, the filing of project

applications, agreements with project sponsors and monitoring of project implementation and reporting.

10. Transfer of Funds. This is not applicable to TCTB. TCTB has no policy for the transfer of 5310 funds to Section 5307. Should such a need ever be anticipated, TCTB will develop and submit such a policy to FTA for approval.

11. Private Sector Participation. TCTB shall publish a notice of grant opportunity as well as send a letter to all non-profit and private transportation providers in the urbanized area.

12. Civil Rights. TCTB complies fully with Title VI of the Civil Rights Act. TCTB certifies compliance with Title VI of the Civil Rights Act by sending an annual certification letter to any and all sub-recipients. All sub-recipient contracts shall include federally required Title VI clauses.

13. Section 504 and ADA Reporting. TCTB will certify compliance with Section 504 and ADA regulations by sending an annual certification letter to sub-recipients. All sub-recipient contracts shall include federally required 504 clauses.

14. Program Measures. The reporting and data collection measures for the 5310 Programs will be prescribed in the agreements with sub-recipients and include data regarding the following:

1. Traditional Section 5310 Projects (minimum of 55% of apportioned funding)
 - a. Gaps in service filled – seniors and individuals with disabilities afforded mobility not available without 5310 program support
 - b. Ridership – Annual actual or estimated number of rides provided to seniors and individuals with disabilities
2. Other Section 5310 Projects (Up to 45% of apportioned funding)
 - a. Increases or enhancements related to geographic coverage, service quality, and/or service times that impact availability of services to seniors and individuals with disabilities
 - b. Additions or changes in physical infrastructure, technology, and vehicles that impact the availability of transportation services for seniors and people with disabilities
 - c. Annual actual or estimated number of rides provided for seniors and individuals with disabilities

Reporting will be completed through TEAM or its successor. Information reported may be consolidated for all projects in an annual report.

15. Designated Recipient Program Management. This Program Management Plan (PMP) describes the TCTB's policies and procedures for administering the Federal Transit Administration's (FTA) Section 5310 program. This PMP is designed to meet federal requirements and facilitate TCTB's management and administration of the 5310 Programs. It will also serve as a guide to the general public and prospective applicants and to assist FTA in

its oversight responsibilities by documenting TCTB's policies and procedures for administering these programs.

TCTB has assigned its Mobility Manager as project manager for its Program Management Plan. This person, or his designee, will be responsible for reviewing and processing all reports, plans and certifications required to be submitted under these regulations. TCTB will review information provided by the sub-recipients of Section 5310 funds on a quarterly basis.

The TCTB project manager will establish and maintain a point of contact with each sub-recipient and will monitor compliance through review of required quarterly reports, telephone inquiries and periodic site visits.

Accounting Systems, Financial Management, and Reporting

TCTB has an established accounting and reporting system that meets or exceeds FTA requirements for financial management. In addition, all sub recipients must assure TCTB that each has fiscal control and accounting procedures that will permit preparation of the required reports as well as a level of expenditures adequate to establish that such funds are used consistent with the rules and requirements of the program. These systems will also allow for the accurate, current, and complete disclosure of all financially assisted activities, the establishment and maintenance of accounting records which are supported by source documents and which adequately identify the source and application of funds provided, the effective control and accountability of cash, real and personal property, and other assets; the comparison of actual expenditures with budgeted amounts, allowing for the development of performance or productivity data and unit cost information, where appropriate; the application of OMB cost principles, agency program regulations, and the terms of sub recipient's grant agreement to determine the reasonableness, allowability, and allocability of costs; and a procedure for minimizing the time elapsing between the receipt of Federal funds and local disbursement.

All sub-recipients receiving operating assistance are required to report financial and operating data on a quarterly and annual basis. Milestone reports are also required for all capital and planning grants. Eligible direct recipients have in place accounting systems, financial management procedures and reporting capabilities adequate to meet the requirements of FTA.

All sub-recipients receiving capital assistance are required to keep appropriate property control records on all equipment and real property. Federal Office of Management and Budget and Federal Transit Administration guidelines are used in meeting this reporting requirement.

Procurement, Property Management, Vehicle Use, Maintenance and Disposition

As the Designated Recipient for Section 5310 funding, TCTB will manage capital from procurement until disposition using FTA required processes and management reviews.

Audits and Close-Outs

Sub-recipients are responsible for securing organization-wide or grant specific audits. All audits performed on sub-recipient under the Section 5310 program shall be in accordance with Office

of Management and Budget, Circular A-133. The closeout of 5310 grants will occur after TCTB has received, reviewed, and accepted any final grant reports, and notified the grantee of such acceptance.

The legally authorized auditing body for all sub-recipients (units of local government - cities, counties, towns, etc.) is the State Auditor. Sub-recipient that contract with private companies for transit service must require that these companies provide them with their annual audit. The grantee is responsible for reviewing all sub-contractors' audit reports and appropriately resolving and reporting any findings.

TCTB will perform a project closeout with sub-recipients within 90 days after all funds are expended and all work activities for the project are completed. TCTB will initiate program of project (POP) closeout with FTA within 90 days after all work activities for the POP are completed. TCTB will electronically submit a final Financial Status Report (SF 269A), final budget, and final POP via the TEAM system at the time of closeout.

Subcontractors will be required to submit a project activity report and status reports. Programs status will be reviewed and a comprehensive status report will be prepared quarterly. Program status reports for FTA grants are provided quarterly.

Other Provisions

TCTB will require certifications and assurances from sub-recipients that they will comply with other Federal requirements such as environmental protection, Buy America provisions, pre-award and post-delivery reviews, restrictions on lobbying, prohibition on exclusive school transportation, and drug and alcohol testing, as appropriate. Depending on the nature of the project, TCTB will require reporting on the relevant actions taken to comply with the federal requirements listed above as part of quarterly reporting.

In cases when a selected project involves a direct recipient of FTA funds such as TCTB, that entity will apply for funds directly and monitor the project. Those agencies are familiar with and in compliance with FTA requirements as part of the 5307 process.

TCTB will issue revisions to the PMP in a timely manner, particularly when information helpful to minority applicants, sub-recipients, and third party contractors is involved. Further, should major revisions to the PMP be required, TCTB will afford project selection committee members the opportunity to review and comment on revisions prior to submission to FTA for approval.

Project Monitoring

TCTB will monitor projects and any contracts with sub-recipients in the following manner consistent with its own project reporting requirements with the Federal Transit Administration. These requirements include TCTB's direct quarterly and annual reporting requirements to FTA in the following areas:

1. Quarterly and annual program of projects reporting on each FTA grant contract
2. Milestone activity reports – filed with quarterly and annual program of project reports

3. Financial status reports – Submitted quarterly and annually
4. Program measures – Submitted quarterly and annually
5. Disadvantaged Business Enterprise (DBE) reports – as required for contracts in excess of \$250,000

Additionally, TCTB will structure contracts and reporting in the following manner:

1. In the process of executing sub-recipient contracts, TCTB will meet with sub-recipients and explain all contract obligations, including financial and non-financial reporting of project status, progress and compliance with contract requirements
2. Sub-recipients will be required to file monthly reports, due by the 15th of the following month. Monthly reports will include:
 - a. a comparative statement of project expenses relative to budget for the month and project to date
 - b. a progress report on project implementation, progress, made, problems encountered and proposed resolution, and expected activities in the following month
 - c. project progress compared to project implementation timeline

Monthly reports are not required for periods where quarterly reports are required.

3. Sub-recipients will be prepared to file quarterly reports by the 15th of April, July, October and January. The quarterly reports will include all required submissions for monthly reporting and include the following additional information:
 - a. A review of contract compliance
 - b. An analysis of the status of the project relative to project obligations in the contract
 - c. Recommendations for corrective actions, as required
 - d. Recommendations for contract amendment, if desired

The fourth quarter report will serve as the annual report of project status.