

# 2024 Specialized Transportation Program Management Plan

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# About SANDAG

## Vision Statement

Pursuing a brighter future for all.

## Mission Statement

We are the regional agency that connects people, places, and innovative ideas by implementing solutions with our unique and diverse communities.

## Our Commitment to Equity

We hold ourselves accountable to the communities we serve. We acknowledge we have much to learn and much to change; and we firmly uphold equity and inclusion for every person in the San Diego region. This includes historically underserved, systemically marginalized groups impacted by actions and inactions at all levels of our government and society. We have an obligation to eliminate disparities and ensure that safe, healthy, accessible, and inclusive opportunities are available to everyone. SANDAG will develop an equity action plan that will inform how we plan, prioritize, fund, and build projects and programs; frame how we work with our communities; define how we recruit and develop our employees; guide our efforts to conduct unbiased research and interpret data; and set expectations for companies and stakeholders that work with us. We are committed to creating a San Diego region where every person who visits, works, and lives can thrive.

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# Executive Summary

This Specialized Transportation Program Management Plan (PMP) describes the SANDAG policies and procedures for administering its Specialized Transportation Grant Program (STGP), which includes funding from the Federal Transit Administration (FTA) Section 5310 and TransNet Senior Mini-Grant programs.

## Purpose

Federal guidance for Section 5310 (FTA Circular 9070.1G) requires that SANDAG develop a PMP to facilitate grant management and FTA oversight over the program. This PMP is designed to document applicable SANDAG policies and federal, state, and local statutes and regulations so that compliance can be attained. Specifically, the purpose of this PMP is to serve several functions:

- Provide up-to-date guidance to local grant applicants, subrecipients of federal funds, and TransNet grantees
- Provide public information on the administration of the SANDAG STGP, including the Section 5310 and Senior Mini-Grant programs
- Serve as the basis for the FTA to perform management reviews of SANDAG administration of the federal grant programs

The intent of this PMP is to ensure that the maximum possible benefit is enjoyed in the region through a fair and equitable distribution of available funds and the effective administration and monitoring of the STGP. Updates to applicable statutes or FTA circulars will not necessitate revisions to this PMP unless specifically required by the relevant update.

## Overview

This PMP is structured to follow the grants management lifecycle, which starts with the pre-award phase and concludes with closeouts and audits. The following sections include a brief overview of the information provided in each of the PMP chapters:

### Chapter 1: Introduction

This chapter provides background on the STGP, delineates roles and responsibilities in the administration of the STGP, and summarizes the current federal and local funding sources.

### Chapter 2: Call for Projects Development and Release

The development and release of an STGP call for projects, and the funding allocation process, are discussed in this chapter, which also outlines funding eligibility, evaluation criteria, and the application window for the Section 5310 and Senior Mini-Grant programs.

### Chapter 3: Awarding Grant Funding Process

An overview of the procedures SANDAG uses to develop rankings and ensure a fair and equitable allocation of funding will be discussed in this chapter.

#### Chapter 4: Grant Implementation and Program Requirements

Chapter 4 describes the timeline for implementing STGP-funded projects and details program requirements for all types, including vehicle projects.

#### Chapter 5: Monitoring and Reporting

This chapter outlines how SANDAG staff monitor grantee performance and compliance with the terms of the grant agreement to ensure oversight of the STGP; and it also describes SANDAG's procedures for reporting grantee performance to the FTA, SANDAG Policy Advisory Committees, and other stakeholders.

#### Chapter 6: Closeout

SANDAG and grantee responsibilities and procedures for closing out STGP projects, as well as the requirements for disposing project property and retaining project records after a grant has closed out are described in this chapter.

#### Chapter 7: Glossary of Terms

Definitions of key terms used in the PMP can be found in this chapter.

#### Chapter 8: Online Resources Referenced

This chapter lists websites and web pages that are linked in the PMP.

#### Appendices

This PMP includes the following appendices, which can be found at the STGP web page ([SANDAG.org/STGP](https://www.sandag.org/STGP)):

- Section 5310 Grant Agreement template
- Senior Mini-Grant Agreement template
- Vehicle Lease Agreement template

# Chapter 1: Introduction

## 1.1 Specialized Transportation

Specialized transportation encompasses a broad range of transportation-related services to improve mobility for older adults and individuals with disabilities when fixed-route public transit is insufficient, unavailable, or inappropriate. The region's current specialized transportation providers include the transit operators, Metropolitan Transit System (MTS) and North County Transit District (NCTD), local jurisdictions; social service organizations; private companies; and the Consolidated Transportation Service Agency (CTSA). Collectively, these providers offer an array of transportation choices and services such as paratransit, door-to-door service, door-through-door service, volunteer driver programs, shuttle programs, mobility management, and non-emergency medical transportation.

## 1.2 Program Authorization and Background

### Federal Program Authorization

On July 6, 2012, the Moving Ahead for Progress in the 21st Century Act (MAP-21) was signed into law, creating the Section 5310 program. On December 4, 2015, the Fixing America's Surface Transportation (FAST) Act was signed into law, reauthorizing surface transportation programs including the Section 5310 program through Federal Fiscal Year (FFY) 2020. The Coronavirus Response and Relief Supplemental Appropriations Act of 2021 (CRRSAA) as well as the American Rescue Plan Act of 2021 (ARPA) allocated additional funding to the Section 5310 program to provide relief for the transit industry during the COVID-19 public health emergency. On November 15, 2021, the Infrastructure Investment and Jobs Act (IIJA) was signed into law, which reauthorized surface transportation programs through FFY 2026, including the Section 5310 program.

### Local Program Authorization

TransNet is San Diego County's half-cent sales tax for transportation projects. The TransNet Extension Ordinance, passed by San Diego voters in November 2004, includes a provision for a Senior Mini-Grant program to provide specialized transportation services for people aged 60 or older. The TransNet Extension Ordinance states that Senior Mini-Grant funds shall be used for innovative and cost-effective specialized transportation services for older adults (age 60 and older) including, but not limited to, shared group services, special shuttle services using volunteers, and brokerage of multi-jurisdictional transportation services.

### Specialized Transportation Grant Program Background

The SANDAG Specialized Transportation Grant Program (STGP) is a program that can be used to fund specialized transportation services. The goal of the STGP is to improve mobility for older adults and individuals with disabilities by delivering effective, equitable, environmentally responsible, and coordinated specialized transportation solutions in our region. The objectives of the STGP are:

- To fund organizations that have the requisite financial, technical, and managerial capacity to implement cost-effective, innovative, and successful specialized transportation services
- To apply a social equity lens to ensure that specialized transportation grants benefit those who need them the most

- To promote healthier air and reduce greenhouse gas emissions region-wide
- To encourage coordination among specialized transportation providers that reduces duplicative services, enhances efficient service, and expands ridership

The SANDAG STGP began in 2006 when SANDAG held its first funding allocation process to distribute Job Access and Reverse Commute (JARC) and New Freedom federal funds. SANDAG has held a total of 11 funding cycles. Table 1.1 provides information on each of the funding cycles, including the federal fiscal year (for federal programs) or fiscal year (for the Senior Mini-Grant program) of when program funds were distributed, the open and close of the call for projects, the date when the Board of Directors approved the funding recommendations, and the award amount(s).

The STGP is currently composed of the FTA Section 5310 and TransNet Senior Mini-Grant programs. As stated previously, MAP-21 authorized a new Section 5310 program: Enhanced Mobility of Seniors and Individuals with Disabilities. FTA released guidance for the Section 5310 program on June 6, 2014 (FTA Circular 9070.1G). The goal of the Section 5310 program, as stated in FTA Circular 9070.1G, is to improve mobility for older adults and individuals with disabilities by removing barriers to transportation services and expanding the transportation mobility options available. The Section 5310 program provides grant funding for transportation services planned, designed, and carried out to meet the special transportation needs of people aged 65 and older and individuals with disabilities in all areas—large urbanized, small urbanized, and rural.

Table 1.1  
Funding Cycles of the STGP

Cycle	FFY or FY of Funding/ Grant Program	Call for Projects	Approval of Funding	Award Amount(s)
1	FFY 2006 JARC	October 6 – Nov 16, 2006	February 27, 2007	\$1,260,947
	FFY 2006 New Freedom			\$261,879
2	FFY 2007 - FFY 2009 JARC	August 3 – October 19, 2007	December 21, 2007	\$3,927,578
	FFY 2007 - FFY 2009 New Freedom			\$1,239,493
3	FFY 2008 - FFY 2009 New Freedom	February 18 – March 14, 2008	September 26, 2008	\$1,201,001
	FY 2009 Senior Mini-Grant			\$3,674,195
4	FFY 2009 JARC	October 1 – December 12, 2008	February 27, 2009	\$273,944
5	FFY 2010 JARC	August 13 – November 12, 2010	February 25, 2011	\$1,780,529
	FFY 2010 New Freedom			\$991,896
	FY 2012 - FY 2013 Senior Mini-Grant			\$2,318,420
6	FFY 2011 JARC	September 16 – December 16, 2011	February 24, 2012	\$1,613,512
	FFY 2011 New Freedom			\$800,765
7	FFY 2012 JARC	August 1 – October 31, 2012	March 22, 2013	\$618,586
	FFY 2012 New Freedom			\$1,132,632
	FY 2014 - FY 2015 Senior Mini-Grant			\$2,854,847
8	FFY 2013 - FFY 2014 Section 5310	July 25 – October 24, 2014	February 27, 2015	\$3,781,846
	FY 2016 - FY 2017 Senior Mini-Grant			\$3,312,322
9	FFY 2015 – FFY 2016 Section 5310	July 22 – October 24, 2016	March 24, 2017	\$3,798,227
	FY 2018 – FY 2019 Senior Mini-Grant			\$3,180,000
10	FFY 2017 – FFY 2018 Section 5310	July 27 – October 25, 2018	March 22, 2019	\$4,069,862
	FY 2020 – FY 2021 Senior Mini-Grant			\$3,104,255



Cycle	FFY or FY of Funding/ Grant Program	Call for Projects	Approval of Funding	Award Amount(s)
11	FFY 2019 – FFY 2020 Section 5310	July 31 – October 30, 2020	March 26, 2021	\$4,217,378 <sup>1</sup>
	FY 2022 – FY 2023 Senior Mini-Grant			\$3,281,344
12	FFY 2021 – FFY 2022 Section 5310	July 6 – October 5, 2022	February 24, 2023	\$5,407,609 <sup>2</sup>
	FY 2024 Senior Mini-Grant			\$2,748,207

## 1.3 Roles and Responsibilities

The following sections outline the roles and responsibilities of federal, state, and local entities pertaining to the administration of the Section 5310 and Senior Mini-Grant programs.

### Federal Transit Administration

The FTA is responsible for national implementation of the Section 5310 program, for which it has provided program guidance in Circular 9070.1G. The guidance elaborates on the intent of these programs, interprets provisions, and provides additional instructions and requirements.

The FTA performs several other functions for these programs in addition to providing policy and program guidance. Congress appropriates program funding and FTA apportions those funds to states and urbanized areas. Grant applications obligating funding are also reviewed and approved by the FTA. Other responsibilities of the FTA include providing technical assistance, advice, and guidance to states and designated recipients as needed. The FTA is also responsible for overall oversight of the federal programs and is required by law to establish performance goals to define the level of performance and performance indicators to be used in measuring relevant outputs, service levels, and outcomes for each of its grant programs. The FTA gathers performance data from grant recipients and monitors program performance through periodic program reviews. Additionally, the FTA oversees recipient's implementation of the programs, which includes reviewing and approving statewide and Metropolitan Planning Organization (MPO) transportation improvement programs and performing triennial reviews and state or program management reviews every three years or as circumstances warrant.

### Caltrans

Caltrans is the designated recipient of Section 5310 funds for California's small urbanized and rural areas. In San Diego County, however, there are currently no small, urbanized areas. Caltrans is responsible for administering the Section 5310 program for the non-urbanized (rural) areas of San Diego County. In its role as Regional Transportation Planning Agency (RTPA), SANDAG assists Caltrans with local administration of the statewide process for the Rural Section 5310 program.

<sup>1</sup> This award amount includes funding awarded through the STGP Cycle 11 Supplemental Call for Projects on July 8, 2022.

<sup>2</sup> This award amount includes additional Section 5310 funding awarded on August 11, 2023.



## San Diego Association of Governments

SANDAG is the federally designated MPO and state designated RTPA for San Diego County. Effective January 1, 2003, SANDAG's governance structure was codified by the California Legislature in the San Diego Region Transportation Consolidation Act (Public Utility Code §132350 et seq.). As a result of its consolidation, SANDAG is responsible for transportation planning, programming, project development, and construction for the region.



### Regional Planning

As the MPO and RTPA for San Diego County, SANDAG is required to conduct long-range (minimum of 20 years) transportation planning for the San Diego region. The SANDAG [Regional Plan](#) outlines a plan for a regional transportation system, which further enhances quality of life, promotes sustainability, and offers more mobility options for people and goods. The Regional Plan is built on a set of integrated public policies, strategies, and investments to maintain, manage, and improve the transportation system so it meets the diverse mobility needs of the San Diego region through at least 2050.

### Coordinated Planning

The [Coordinated Public Transit – Human Services Transportation Plan](#) (Coordinated Plan) supports SANDAG's long-range transportation planning by providing a five-year implementation plan of public transit and specialized transportation concepts described in the Regional Plan. The Coordinated Plan combines the regional requirement for a Short-Range Transit Plan with the federal requirement for a Coordinated Plan into one comprehensive planning document. The Coordinated Plan evaluates available transportation services in the region and establishes strategies to provide transportation to older adults, individuals with disabilities, and low-income persons, among other recognized transportation-disadvantaged population groups. These strategies inform funding prioritization in the distribution of Section 5310 and Senior Mini-Grant funds. The FTA requires that all projects funded through the Section 5310 program be derived from the Coordinated Plan, which must be updated at least every four years per FTA guidance. While the Coordinated Plan includes significant public outreach, the exact level of public outreach conducted is tailored to the extent of the proposed revisions to the document.

### Administration of the STGP

The Governor of the State of California appointed SANDAG as the designated recipient for Section 5310 funds under MAP-21 for the large, urbanized area of San Diego County in letters dated August 21, 2006, and April 23, 2014, respectively. SANDAG continues to be the designated recipient of Section 5310 funds under the FAST Act and IIJA.

As the designated recipient, SANDAG is responsible not only for developing the Coordinated Plan for San Diego County, but also for administering the Section 5310 program for the census-defined large, urbanized area of San Diego County (Figure 1.1). In this role, SANDAG is required by federal statute to, among other activities:

- Maintain a PMP
- Conduct an area-wide solicitation for applicants for grants if a competitive selection process is used
- Certify the fair and equitable distribution of funds

- Certify that each project selected for funding was derived from a strategy in the Coordinated Plan
- Certify that the Coordinated Plan is developed through a process that includes participation by older adults, individuals with disabilities, representatives of public, private, and nonprofit transportation and human service providers, as well as participation by other members the public.

Moreover, as the transportation authority collecting TransNet revenues, SANDAG is responsible for administering all elements of the TransNet program, including the Senior Mini-Grant program. This includes developing program requirements and selection criteria, determining applicant eligibility, notifying eligible applicants of the availability of funds, selecting grants for funding, and monitoring awarded projects.

### Board of Directors

SANDAG is governed by a Board composed of mayors, council members, and county supervisors from each of the region's 19 local governments. Voting members include two elected officials from the City of San Diego and the County of San Diego, and one elected official from each of the other 17 cities, for a total of 21 voting members.

Supplementing these voting members are advisory representatives from Imperial County, Caltrans,

Metropolitan Transit System (MTS), North County Transit District (NCTD), U.S. Department of Defense, San Diego Unified Port District, San Diego County Water Authority, the Southern California Tribal Chairman's Association, Mexico, and the Association of Planning Groups for the County of San Diego. More information about the Board and its members is available at [SANDAG.org/Board](https://www.sandag.org/Board).



The Board plays a critical role in the agency's administration. Several Board policies govern SANDAG operations and day-to-day activities. [SANDAG Board Policy No. 035](#), approved in January 2010 and amended since, outlines competitive grant program procedures. The policy applies to all competitive grant programs administered through SANDAG. Board Policy No. 035 is available at [SANDAG.org](https://www.sandag.org) under Bylaws and Policies and it is discussed further in Sections 3.1 and 4.2.

The Board also plays a role in the funding allocation process; it sets grant eligibility and evaluation criteria, awards grant funding, and approves the Regional Transportation Improvement Program (RTIP), which includes financial programming for grants.

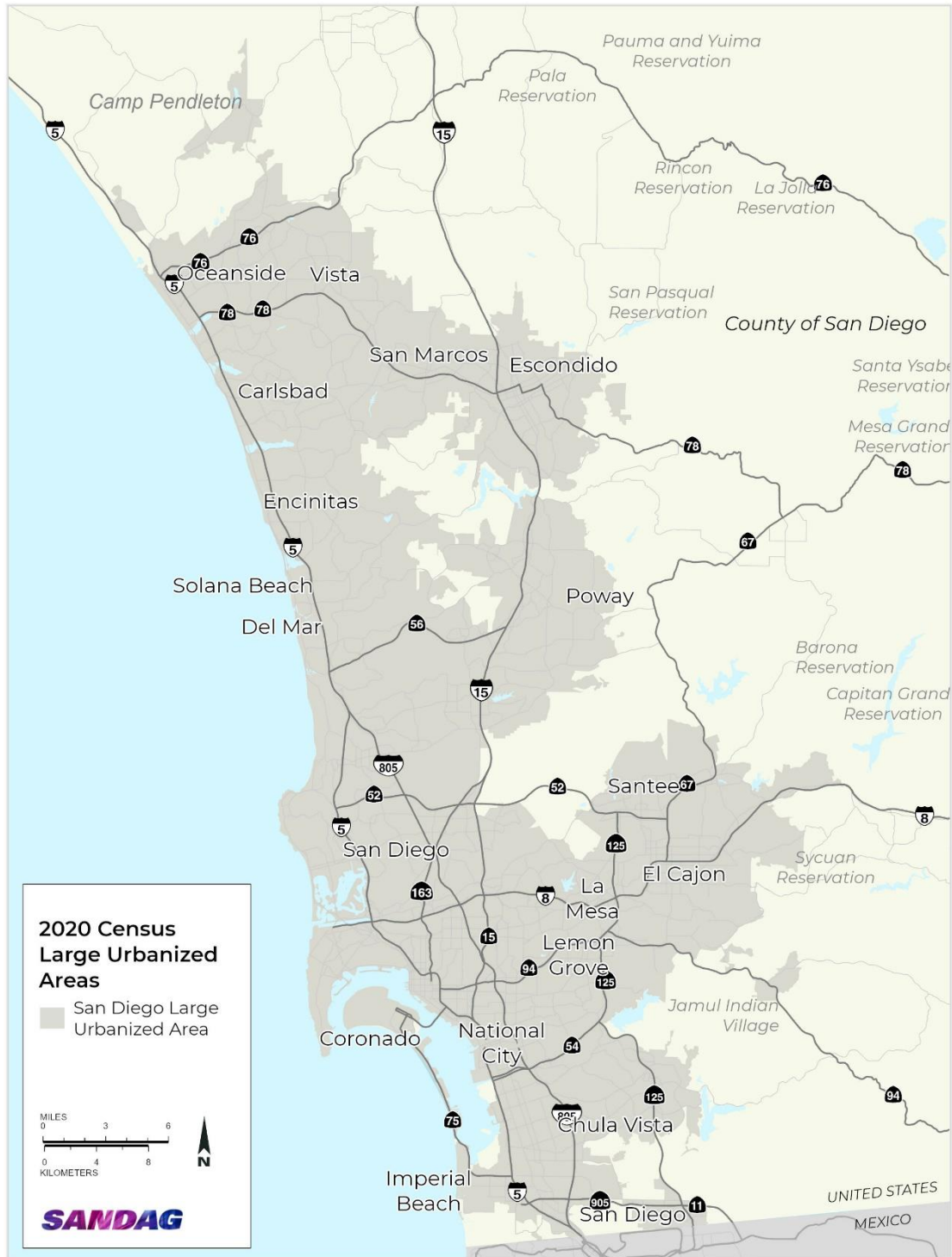
### Consolidated Transportation Service Agency

SANDAG designates San Diego County's Consolidated Transportation Service Agency (CTSA) as well. The CTSA facilitates coordination of transportation services in the county to reduce gaps in transportation. CTSAs were created under the Social Service Transportation Improvement Act of 1979 to promote the consolidation of social service transportation service in California. The creation of CTSAs sought to fulfill the legislative intent as stated in Government Code Section 15951 by combining purchasing of necessary equipment, centralizing dispatching, and maintenance of vehicles, and consolidating administration of various social service transportation programs. Thus, CTSAs are important partners in a region's specialized transportation service delivery.

In 2006, SANDAG selected Facilitating Access to Coordinated Transportation (FACT) as the CTSA after a competitive selection process. Pursuant to [SANDAG Board Policy No. 027](#), SANDAG dedicates a portion of apportioned Transportation Development Act (TDA) Article 4.5 funds in San Diego to the CTSA under contract. During the STGP Cycle 11 call for projects, the Board approved dedicating 25% of available STGP Cycle 11 funding to the CTSA for mobility management activities at its July 24, 2020, meeting. This program change was the result of the June 2019 TDA Triennial Performance Audit Final Report which recommended that “SANDAG and FACT work together to identify and pursue additional funding sources to support its activities as the CTSA.” The Board also approved staff’s recommendation to reduce the maximum grant request amount for CTSA non-mobility management grants to \$200,000 per year per funding source to provide more opportunity for other organizations to compete for STGP grant funding given the proposed dedicated funding for the CTSA. At its March 26, 2021, meeting, the Board approved the STGP Cycle 11 funding recommendations, which included the 25% dedication of funding to the CTSA.

SANDAG may consider dedicating Section 5310 funds to the CTSA on a case-by-case basis in future funding cycles, provided there are sufficient funds, and the CTSA successfully expands services and achieves enhanced performance measures.

Figure 1.1  
Large, Urbanized Area of San Diego County



## Transportation Committee

In addition to the Board, SANDAG has six standing Policy Advisory Committees: Executive Committee, Regional Planning Committee, [Transportation Committee \(TC\)](#), Borders Committee, Public Safety Committee, and Audit Committee. The TC advises the Board on major policy-level matters related to transportation, including the preparation of the Regional Plan; and it also approves and adopts updates to the Coordinated Plan. Because priorities for project funding listed in the Coordinated Plan inform evaluation and selection criteria, it must be adopted by the TC prior to the call for projects. During the funding allocation process, the committee reviews and provides recommendations to the Board on eligibility and evaluation criteria per [SANDAG Board Policy No. 001](#). It also reviews and provides recommendations to the Board on funding allocations and amendments to the RTIP.

Additionally, the TC plays a key role in the oversight of the STGP. The TC receives periodic grant status update reports on the performance of Section 5310 grants and Senior Mini-Grants. The TC also has the authority to grant time extensions for individual grants per Board Policy No. 035.

## Independent Taxpayer Oversight Committee

The TransNet Extension Ordinance and Expenditure Plan of 2004 established the [TransNet Independent Taxpayer Oversight Committee \(ITOC\)](#). The ITOC is intended to provide an enhanced level of accountability for expenditures made under the TransNet Extension Ordinance and it functions in an independent, open, and transparent manner to ensure that all voter mandates are carried out as required and to develop recommendations for improvements to the financial integrity and performance of TransNet programs. The ITOC reports to the public and makes recommendations to the Policy Advisory Committees and the Board. During the funding allocation process, the ITOC reviews eligibility and evaluation criteria for the TransNet Senior Mini-Grant program and verifies that grants recommended for funding are consistent with the [TransNet Extension Ordinance](#) and program objectives. The ITOC receives grant status update reports on the performance of Senior Mini-Grants on a semi-annual basis.

## Social Services Transportation Advisory Council

SANDAG draws upon its working groups for stakeholder input and public participation. The purpose of the [Social Services Transportation Advisory Council \(SSTAC\)](#) (required by California Public Utilities Code [PUC] Section 99238) is to advise SANDAG on any major transit issues, including the coordination and consolidation of specialized transportation services. As such, the SSTAC advises SANDAG on the development of the Coordinated Plan and administration of the STGP. The minimum membership of the SSTAC is outlined in PUC Section 99238 and includes representatives of older adults and disabled transit users; the two transit operators in San Diego County (MTS and NCTD); the local CTSA; and social service providers serving older adults, individuals with disabilities, and low-income individuals.

## Regional Plan Social Equity Working Group

In addition to the SSTAC, the [Regional Plan Social Equity Working Group](#) provides ongoing public input from disadvantaged or underrepresented communities in the region into key activities associated with developing the Regional Plan and related planning activities with a focus on a social equity perspective. As such, the working group helps to inform the development of the Coordinated Plan and advises SANDAG on evaluation criteria used to score proposed STGP projects. The working group is comprised of 13 representatives from community-based organizations or community collaboratives serving underserved/disadvantaged communities.



## SANDAG Staff

While the Grants Division (within the Financial Planning, Budgets, and Grants Department) has primary responsibility for administering the STGP, there are several other SANDAG departments and divisions that provide support. Grants Division staff coordinate with staff from the Office of General Counsel, Diversity and Equity, Contracts and Procurement Division, Regional Planning, Public Affairs, and Accounting and Finance departments, among others. These staff members assist Grant Division staff throughout various phases of the funding allocation process and with executing grant agreements, procuring grant-funded vehicles, monitoring overall program performance, and fulfilling federal and local requirements. In coordination with Public Affairs, Grants staff conduct outreach to older adults, individuals with disabilities, and other stakeholders to gather input on evaluation criteria used to score proposed projects, which may coincide with the Coordinated Planning process. Methods of outreach can include, but are not limited to, holding public workshops and focus groups, releasing surveys in English and other languages upon request, and presenting to working and other stakeholder groups. Grants Division staff also provide technical assistance throughout the grant life cycle. Technical assistance activities include, but are not limited to, hosting a call for projects webinar during the funding allocation process, providing resources and templates to applicants and grantees, hosting a successful applicant webinar for awarded applicants, reviewing subrecipient Title VI programs, conducting performance monitoring and reporting, and sharing best practices when appropriate.

## Specialized Transportation Stakeholders

In addition to the SSTAC, other local agencies, stakeholders, members of the public, and public and private transportation partners are involved in the development of the Coordinated Plan and evaluation criteria for the Section 5310 and Senior Mini-Grant programs, including, but not limited to:

- The Council on Access and Mobility (CAM). CAM serves as a forum for approximately 31 specialized transportation providers and interest groups in the San Diego region. Facilitated by the CTSA, CAM seeks to promote coordination of transportation resources and services in San Diego County.
- Age Well San Diego Transportation and Community Connections Team. Age Well San Diego is a regional initiative led by the County of San Diego to make San Diego's communities better places for people of all ages to live healthy, safe, and thriving lives. The Age Well San Diego initiative is divided into six domains, one of which is transportation. The Transportation and Community Connection Team's vision is a livable community with safe, affordable, accessible, and reliable transportation for non-drivers that ensures older adults stay connected to their communities, the services they need, and the people they care about.

SANDAG maintains a wide-ranging list of public and private transportation providers, social services providers, community-based organizations representing underserved/disadvantaged communities, tribes, and businesses. This list is used to solicit input on evaluation criteria, inform stakeholders when SANDAG releases an STGP call for projects, and encourage eligible organizations to apply through SANDAG's online solicitation platform. Staff also provides notice of the call for projects webinar that informs interested applicants about program requirements and provides application instructions.

## Recipients/Subrecipients

Each specialized transportation grant program administered through SANDAG has different program requirements, including the type of organizations eligible to apply for and receive grant funds. For details on eligible applicants, see Section 3.1. All organizations that are awarded funding and enter into a grant agreement with SANDAG become partners in providing specialized transportation services throughout the region as well as grantees responsible for complying with program and grant agreement requirements as discussed in Chapter 4.

As previously stated, SANDAG is the designated recipient of Section 5310 funds for the large, urbanized area in San Diego County. SANDAG is a grantee of the FTA and is considered a direct recipient of federal funds. Organizations receiving federal funds through SANDAG are considered subrecipients. SANDAG submits a grant application to the FTA and monitors subrecipient compliance with federal requirements. Though MTS and NCTD are direct recipients of federal funds under certain federal programs (e.g., the Section 5307 program), they are not direct recipients of Section 5310 funds. Therefore, like other subrecipients, NCTD and MTS enter a subrecipient relationship with SANDAG to receive Section 5310 funds.

Similarly, once SANDAG executes a grant agreement with a successful applicant awarded TransNet Senior Mini-Grant funds, that applicant becomes a grantee and a recipient of TransNet funds.

## 1.4 Overview of the Current Funding Sources

As previously mentioned, SANDAG distributes both federal and local funds through the STGP. The current Section 5310 program is funded through the FTA. The TransNet Senior Mini-Grant program is funded through the TransNet half-cent sales tax for transportation in San Diego County. The following sections provide more information on these two funding sources. Subsequent chapters describe the process SANDAG uses to allocate these funds.

### Federal Funds

Once authorized through surface transportation or other bills, federal funds for the Department of Transportation (DOT) and its related agencies, including the FTA, are appropriated through legislation passed by Congress and signed into law by the President. Once appropriation legislation is enacted, the FTA offers funding through several discretionary and formula grant programs and provides program guidance in the form of circulars. The Section 5310 program is a formula grant, meaning funds are apportioned based on the number of adults aged 65 and older and individuals with disabilities in a geographical area. Section 5310 funding apportioned to SANDAG is based on the ratio of the number of older adults and individuals with disabilities in the large, urbanized area of San Diego to the number of older adults and individuals with disabilities in all large, urbanized areas across the United States. Once appropriation legislation is enacted, the FTA publishes Section 5310 apportionments for each large, urbanized area in the Federal Register and on the FTA's website.



Depending on availability of funds, SANDAG holds an allocation process biennially to distribute grant funds from up to two consecutive federal fiscal years. Per federal requirements, SANDAG then programs grants awarded funding into the RTIP. Grants are later included in the Statewide Transportation Improvement Program (STIP), which is also required by the FTA. Once grants have been programmed into the RTIP and STIP, SANDAG submits a grant application with the FTA for the Section 5310 grant funds apportioned to the large, urbanized area of the San Diego region, which is equal to the collective funding amount awarded to grants through the funding allocation process plus the allowable funding for the administration of the Section 5310 program. SANDAG uses 10% of the total available Section 5310 funding to conduct activities related to program administration, planning, and technical assistance. Once the FTA approves the SANDAG Section 5310 grant application and the grant is executed, the grant funds are considered obligated. SANDAG executes grant agreements with its subrecipients afterward. Section 5310 awards are contingent on the availability of appropriated funds.

The FTA requires that Section 5310 funds be obligated within the subsequent two federal fiscal years following the federal fiscal year of apportionment. For example, Section 5310 funds apportioned in FFY 2023 must be obligated by September 30, 2025, which is the last day in FFY 2025. Any Section 5310 funds remaining unobligated at the end of the period of availability will lapse.

#### Local Funds

The TransNet Extension Ordinance, as approved by San Diego voters in 2004, allocates 16.5% of net annual TransNet revenues to transit services. Of the 16.5%, 3.25% is allocated to support a competitive grant program for nonprofit organizations and local agencies providing specialized transportation to people aged 60 or older. This grant program is known as the Senior Mini-Grant program. Depending on the availability of funding, SANDAG holds a process to jointly allocate two fiscal years of Section 5310 and TransNet Senior Mini-Grant funding. TransNet funds are sales tax revenue from retail transactions within the County, which fluctuate based on economic conditions and spending patterns. Therefore, awarded funds through the Senior Mini-Grant program are contingent on the availability of sales tax revenues during the grant life cycle. SANDAG uses 10% of the total available Senior Mini-Grant funding to conduct activities related to program administration, planning, and technical assistance. Once grants awarded Senior Mini-Grant funding are programmed into the RTIP, SANDAG can execute grant agreements with awarded applicants and awarded projects can begin.

# Chapter 2:

## Call for Projects Development and Release

SANDAG conducts a competitive selection process, or a call for projects, to allocate grant funds through the Section 5310 and Senior Mini-Grant programs.<sup>3</sup> To ensure an open and transparent competitive process, SANDAG seeks stakeholder input and public participation throughout all phases of the program, especially during the development of the call for projects. The development and release of the call for projects encompasses:

- Initial planning
- Public outreach and stakeholder engagement
- Drafting and approval of evaluation and eligibility criteria
- Release of the call for projects
- Application window

The following sections provide more detailed information on these activities.

### 2.1 Call for Projects and Initial Planning

A call for projects requires input and preparation from staff in several SANDAG departments. Grants Division staff first determines the call for projects timeline in coordination with staff from the Office of General Counsel, Contracts and Procurement Division, and Public Affairs, among others. Grants Division staff also calculates the amount of Section 5310 and Senior Mini-Grant funding that can be made available through the call for projects. Those calculations and the methods used to derive those calculations are verified by staff from Finance to ensure accuracy. Grants Division staff then coordinate with Public Affairs staff to identify effective public engagement strategies and schedule outreach activities and events.

Meanwhile, SANDAG staff reviews lessons learned from the prior call for projects; stakeholder feedback received through prior calls for projects and the Coordinated Plan development process; program audit recommendations; and any changes to local, state, or federal requirements. Since the FTA requires all Section 5310 direct or designated recipients to maintain a PMP, staff may also analyze PMPs and Section 5310 application materials from other regions to identify best practices and emerging trends that could benefit the San Diego region. Staff synthesizes this information and research to draft updates to the SANDAG PMP, and possible eligibility and evaluation criteria changes for the call for projects.

### 2.2 Public Outreach and Stakeholder Engagement

SANDAG conducts robust public outreach to ensure specialized transportation stakeholders can provide meaningful input on substantive and significant changes to its PMP as well as eligibility and evaluation criteria used during the call for projects. The extent and timing of the tactics and strategies employed in each call for projects may vary from cycle to cycle, depending on factors such as the timing of the

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<sup>3</sup> Should SANDAG dedicate funding to the CTSA in future funding cycles, that amount will be deducted from the funding available in the competitive selection process.

Coordinated Plan update, the extent of possible changes from the prior call for projects, and the specific specialized transportation stakeholders SANDAG is trying to reach.

### PMP Update Process

SANDAG drafts updates to its PMP to reflect lessons learned; current practices; and any changes to federal, state, or local requirements that impact the STGP. Consistent with federal guidance, SANDAG's goal is to provide timely updates to its PMP. At a minimum, SANDAG typically updates its PMP every two years to coincide with the release of the call for projects. This ensures that prospective applicants have the most current information regarding program requirements and procedures when deciding whether to apply. The following sections describe the process by which SANDAG drafts updates to its PMP based on whether the proposed changes are substantive and significant or minor and contain technical corrections.

#### Process for Proposed Substantive or Significant Changes

If the draft PMP contains substantive and significant changes, SANDAG staff first submits its draft update to the FTA for a preliminary review. Meanwhile, SANDAG posts the draft PMP update to its website and invites public input. The length of the public comment period depends on the significance of the proposed updates but is typically 30 days to ensure that specialized transportation stakeholders have sufficient time to provide meaningful input. As mentioned earlier, SANDAG maintains a diverse specialized transportation stakeholder list of public and private transportation providers, social services providers, community-based organizations representing underserved/disadvantaged communities, tribes, and businesses. SANDAG emails this distribution list to notify the public of the draft PMP update and invite their input. SANDAG also provides Grants Division staff contact information for those that have technical difficulty submitting online comments and need alternative ways to provide input. Once the public comment period closes and SANDAG receives feedback from the FTA, SANDAG staff refines the draft PMP as needed. SANDAG staff then may present the draft PMP update to the TC for its information, highlighting the public feedback received and summarizing any changes made in response to the FTA or other feedback. The updated PMP is then sent to the FTA for approval. Pending FTA approval, the final PMP is posted on SANDAG's website.

#### Minor Changes or Technical Corrections

If the draft PMP contains only minor changes or technical corrections, SANDAG submits the revisions to the FTA, so that the FTA has a complete copy of the current PMP on file. SANDAG also posts the updated PMP to the SANDAG website, so that applicants, grantees, and the public can view timely information on SANDAG's administration of the STGP.

### Outreach Methods for Public Input on Eligibility and Evaluation Criteria

The following list outlines some strategies SANDAG may employ to gather robust and meaningful input from specialized transportation stakeholders on eligibility and evaluation criteria updates:

#### STGP Web Page

This web page provides call for project outreach materials and information.

#### Release of a Specialized Transportation Outreach Survey

This survey is tailored to specialized transportation riders, including older adults and individuals with disabilities; specialized transportation providers; organizations or individuals representing older or disabled riders, and other specialized transportation stakeholders. The survey can be translated into Spanish and other languages upon request to support SANDAG's implementation of its [Language Assistance Plan](#). It can also be made available in alternative formats upon request. SANDAG ensures that the outreach survey is open for sufficient time to allow for meaningful input.

### Facilitation of an STGP Workshop

This standalone workshop is dedicated to the STGP, including the needs of specialized transportation users in the region, suggestions for improvements in SANDAG's administration of the STGP, and ideas on if or how the eligibility and evaluation criteria should be changed to enhance the provision of specialized transportation services. A workshop can be an effective tool to tap into the expertise of specialized transportation stakeholders. SANDAG also provides other ways to provide meaningful input to ensure those who cannot attend the workshop can still fully participate in the public engagement process.



### Presentations to SANDAG Working Groups and Other Stakeholder Groups

During the public engagement process, SANDAG staff attends meetings of multiple SANDAG working groups and other stakeholder groups, which may include the SANDAG Social Equity Working Group, the SSTAC, Age Well San Diego Transportation and Community Connections Team, and CAM. At these meetings, SANDAG staff notifies the public of the availability of funds, provides an overview of the upcoming call for projects, and solicits input on the eligibility and evaluation criteria.

### Specialized Transportation Stakeholder Email Distribution List

SANDAG emails this list to apprise the public of outreach events and activities, to note updates to the development of the call for projects and invite emailed or mailed public comments to SANDAG. Throughout the public engagement process, SANDAG also encourages stakeholders not already on the email distribution list to contact SANDAG to be added. Individuals can also subscribe to this list by visiting the [SANDAG Specialized Transportation web page](#).

### Other Dissemination Methods

SANDAG may use the following additional methods to disseminate information about the call for projects and invite public participation: articles in SANDAG's eNewsletter and the STGP grantee eNewsletter, social media posts, a call for projects flier, and a prominent banner on the home page of SANDAG's website.

### Stakeholder Feedback Documentation

Regardless of the method used, all stakeholder feedback is documented and reviewed. At the end of public engagement process, SANDAG posts a summary of the feedback received on the STGP web page and then notifies stakeholders of the summary posting, demonstrating that stakeholder input has been captured and considered in refining the evaluation and eligibility criteria to best meet the region's specialized transportation needs.

## 2.3 Eligibility and Evaluation Criteria Approval

SANDAG staff synthesizes lessons learned, best practice and peer review research, audit recommendations, and public input to finalize draft eligibility and evaluation criteria, which undergo a legal review by the SANDAG Office of General Counsel to ensure they conform to program requirements. Staff then presents the eligibility and evaluation criteria for the Senior Mini-Grant program to the ITOC. The TC then considers any feedback from the ITOC when reviewing overall STGP eligibility and evaluation criteria for the Section 5310 and Senior Mini-Grant programs. Pending a recommendation by the TC, the Board of Directors is then asked to consider the feedback from the ITOC and TC and approve eligibility and evaluation criteria used in the call for projects.

## 2.4 Call for Projects Release

While the ITOC and TC recommend, and Board approves, the eligibility and evaluation criteria, staff prepares the call for projects materials, including application materials, grant agreement templates, and technical assistance resources. Like the eligibility and evaluation criteria, all call for projects materials undergoes a legal review by the Office of General Counsel. Additionally, technical call for project material is reviewed by Research and Program Management staff to ensure accuracy. Pending Board approval of the eligibility and evaluation criteria, staff releases the call for projects.

### Announcing the Release of the Call for Projects

SANDAG communicates the release of the call for projects in multiple ways to a variety of stakeholders, including potential applicants that would serve predominantly minority populations consistent with federal Title VI guidance. Staff updates its program web page and emails its specialized transportation distribution list, which includes stakeholders from the public engagement process. The web page and notification also include details on its call for projects webinar, described in the following section. Additionally, SANDAG may employ the following tactics to inform potential applicants of the call for projects release:

- Posting a press release
- Publishing a public notice on its website
- Distributing a flier
- Using social media
- Including an article in SANDAG eNewsletters
- Forwarding email to the SSTAC, Social Equity Working Group, and other stakeholder groups to share with their stakeholders such as community-based organizations

## 2.5 Application Window

Call for projects materials are posted to SANDAG's online solicitation portal. Included in those materials are the dates for the call for projects release, call for projects webinar, deadline for applicants to submit questions, deadline for SANDAG to respond to questions, and the application deadline. Additionally, any changes to the call for projects are released through addenda and posted through the online solicitation portal. Per Board Policy No. 035, grant applications are due at least 90 days from the date the call for projects is released. SANDAG requires applicants to submit application materials through an online solicitation portal. On its website, SANDAG provides prospective applicants step-by-step guides on how to register their organizations in the online portal and how to upload application materials. Applicants can also call or email the online portal vendor for technical assistance in uploading application materials.

### Call for Projects Webinar

After the call for projects is released, SANDAG staff holds a call for projects webinar to review the materials and provide guidance in application submission. Prospective applicants and members of the public may ask questions about the call for projects during the webinar or during the application window via an online solicitation portal. For transparency and consistency, staff responds to questions at the webinar or via the online solicitation portal.

# Chapter 3:

## Awarding Grant Funding Process

Once applications are submitted, SANDAG staff reviews them to ensure they meet eligibility requirements, evaluators score eligible applications, and funding recommendations are developed. This chapter details these steps in the process for allocating grant funding.

### 3.1 Eligibility Requirements

Eligibility requirements are the legal minimum requirements that determine if an applicant's proposed grant can qualify for funding and proceed in the funding allocation process. The Section 5310 and Senior Mini-Grant programs have different funding eligibility requirements, including requirements for the applicant and project type, the service area, and the allowable use of program funds. The following sections discuss eligibility requirements and distinguish between Section 5310 and Senior Mini-Grant program-specific requirements. Table 3.1 summarizes the eligibility requirements for applicants, project types, activities, and service areas by each funding program.

#### Project Types

Section 5310 funds can be used to support eligible capital, mobility management, and operating, whereas Senior Mini-Grant funds can be used to support eligible mobility management and operating projects. These eligible project types are detailed below.

#### Capital

A capital project consists of the acquisition of contracted transportation services or the purchase of personal property such as vehicles, computers and software, maintenance equipment, and communication systems.

Examples of eligible capital projects include, but are not limited to:

- Purchase of accessible vehicle(s)
- Acquisition of support facilities and equipment for Section 5310-funded vehicles such as computer hardware and software, transit-related intelligent transportation systems, and dispatch systems
- Acquisition of contracted transportation services

#### Mobility Management

A mobility management project consists of short-range planning and management activities that improve coordination among public transportation and other transportation service providers. Mobility Management techniques may enhance transportation access for populations beyond those served by one organization within the region. For example, a nonprofit agency could receive Section 5310 funding to support the administrative costs of sharing services it provides to its own clientele with others in the target population and coordinate usage of vehicles with other nonprofits, but not the operating costs of service. Mobility management is intended to build coordination among existing specialized and public transportation providers with the result of expanding the availability of service.

Examples of eligible mobility management projects include, but are not limited to:

- Operation of transportation brokerages to coordinate providers, funding agencies, and passengers



- Operation of one-call/one-click traveler services to coordinate transportation information on all travel modes and to manage eligibility requirements as well as arrangements for customers among supporting programs
- Individual and group travel training instruction that promotes access to specialized and fixed route transportation services
- Operational planning for the acquisition of intelligent transportation technologies to help plan and operate coordinated systems including geographic information systems mapping, global positioning system technology, coordinated vehicle scheduling, dispatching, and monitoring technologies, as well as technologies to track costs and billing in a coordinated system, and single smart customer payment systems

### Operating

An operating project consists of activities and expenses to operate, maintain, and manage a specialized transportation service for the target population.

Examples of eligible operating projects include, but are not limited to:

- Operation of a volunteer driver program
- Operation of a senior shuttle
- Support for taxi voucher programs



Table 3.1  
Summary of Eligibility Requirements per Project Type

	Senior Mini-Grant	Section 5310
<b>Eligible Applicants</b>	<ul style="list-style-type: none"> <li>Local government agencies</li> <li>Private and public operators of public transportation</li> <li>Nonprofit organizations</li> <li>Tribal governments</li> <li>Social service agencies</li> </ul>	<p>Traditional</p> <ul style="list-style-type: none"> <li>Private nonprofit organizations</li> <li>State or local governmental authorities that: <ul style="list-style-type: none"> <li>Are approved by a state to coordinate services for older adults and individuals with disabilities</li> <li>Certify that there are no nonprofit organizations readily available in the area to provide the service</li> </ul> </li> </ul> <p>Nontraditional</p> <ul style="list-style-type: none"> <li>Private nonprofit organizations</li> <li>State or local governmental authorities</li> <li>Operators of public transportation</li> </ul>
<b>Eligible Types</b>	<ul style="list-style-type: none"> <li>Operating (OP)</li> <li>Mobility Management (MM)</li> </ul>	<ul style="list-style-type: none"> <li>Operating (OP)</li> <li>Mobility Management (MM)</li> <li>Capital (CAP)</li> </ul>
<b>Eligible Activities</b>	<ul style="list-style-type: none"> <li>Senior shuttle service</li> <li>Travel training programs</li> <li>Volunteer driver programs</li> <li>Non-emergency medical transportation</li> <li>Mobility management</li> <li>Transit voucher programs</li> </ul>	<p>Traditional</p> <ul style="list-style-type: none"> <li>Vehicle procurement</li> <li>Support equipment procurement</li> <li>Contract transportation services</li> <li>Mobility management and coordination programs</li> </ul> <p>Nontraditional</p> <ul style="list-style-type: none"> <li>Volunteer driver programs</li> <li>Shuttle, ridesharing and vanpooling programs</li> <li>Non-emergency medical transportation</li> </ul>
<b>Eligible Project Service Areas</b>	Within San Diego County	Within the large, urbanized area of San Diego County (as defined by the most recently available decennial Census data)
<b>Target Population</b>	Individuals aged 60 and older	Individuals aged 65 and older and/or individuals with disabilities

#### Eligible Projects

Under MAP-21 and the FAST Act, there are two different categories of eligible projects for the Section 5310 program: traditional and nontraditional.

### Traditional Section 5310 Projects

The FTA defines traditional Section 5310 projects as “those public transportation capital projects planned, designed, and carried out to meet the specific needs of older adults and individuals with disabilities when public transportation is insufficient, unavailable, or inappropriate.” Capital and mobility management projects, as defined above, are traditional Section 5310 projects. The FTA requires that at least 55% of a recipient’s Section 5310 apportionment be used toward traditional Section 5310 projects.

### Nontraditional Section 5310 Projects

Nontraditional Section 5310 projects are those projects that exceed the ADA minimum requirements, improve access to fixed route service, and decrease reliance by individuals with disabilities on ADA complementary paratransit service, or provide alternatives to public transportation that assist older adults (age 65 and older) and individuals with disabilities with transportation. Operating projects, as defined above, are nontraditional Section 5310 projects. The FTA mandates that no more than 45% of available Section 5310 funds may be used for nontraditional Section 5310 projects.

### Section 5310 Funding Distribution

For SANDAG’s Section 5310 apportionment, at least 55% of funds are used for traditional Section 5310 Projects, approximately 35% of funds are used for nontraditional Section 5310 projects, and no more than 10% of funds are used for SANDAG administration.

Table 3.2

Section 5310 Funding Distribution

Section 5310 Budget Description	Percent Allocation
Traditional Projects	55%
Nontraditional Projects	35%
SANDAG Administration	10%

### Senior Mini-Grant Eligible Projects

The Senior Mini-Grant program funds mobility management and operating projects, as defined above, such as senior shuttles, volunteer driver programs, and travel training programs. No more than 10% of funds are used for SANDAG administration.

#### Eligible Applicants

All applicants must meet certain minimum requirements to be considered eligible for STGP funding. Additionally, eligible applicants for Section 5310 funds vary depending on whether the type of project proposed is traditional or nontraditional.

### All Applicants

Both STGP Section 5310 and Senior Mini-Grant applicants are required to:

- Have the technical and financial capacity to implement one or more proposed projects if awarded funding
- Must not be subject to trade restrictions with the United States government
- Be eligible to do business with SANDAG. All applicants must provide their Federal Employer Identification Number (EIN). Applicants that are nonprofit organizations must provide:

- Proof of nonprofit status such as their latest Form 990 filed with the Internal Revenue Service
- Documentation demonstrating that they are in good standing with the State of California Franchise Tax Board or California Office of Attorney General at the time of application submittal. All nonprofit public benefit corporations operating in California, except, for example, hospitals and educational institutions, must register and file reports with the Registry of Charitable Trusts maintained by the State of California's Office of Attorney General
- Complete and submit the following form: Public Contract Code Questionnaire and Section Statements. By signing this form, an applicant declares whether it or any of its officers or employees have ever been disqualified, removed, or prevented from bidding or proposing on a local government project in accordance with Public Contract Code Section 10162. The applicant also declares whether or not it has been convicted within the preceding three years of any offenses stipulated in Public Contract Code Section 10285.1, including any charge of fraud, bribery, collusion, conspiracy, or any other act in violation of any state or federal antitrust law.

### Section 5310 Eligible Applicants

Section 5310 applicant eligibility is based on whether a Section 5310 proposed project is traditional or nontraditional.

#### Traditional Section 5310 Project Eligible Applicants

Eligible applicants for traditional Section 5310 projects are:

- Private nonprofit organizations
- State or local governmental authorities that:
  1. Are approved by the State of California to coordinate services for older adults (age 65 and older) and individuals with disabilities; or
  2. Certify that there are no nonprofit organizations readily available in the area to provide the service

Governmental authorities eligible to apply for funds as “coordinators of services for older adults and individuals with disabilities” (number 1 above) are those designated by the State of California to coordinate human service activities in a particular area.

All other state or local governmental authorities must certify that there are no nonprofit organizations readily available in the service area to provide the service (number 2 above). To satisfy this requirement, state or local government authorities must do the following:

1. Hold a public hearing
2. Provide sufficient notice of such public hearing (at least 30 days prior to the date of the public hearing)
3. Provide private nonprofit transportation providers with individual notice of the public hearing
4. Record each private nonprofit organization notified, along with copies of any comments, objections, or requests for information received
5. Pass a resolution certifying that there are no private, nonprofit organizations readily available to provide the proposed service

6. Submit the resolution along with the List of Private Nonprofit Transportation Providers contacted to SANDAG prior to a call for projects application deadline

A traditional project eligibility resolution template is made available during the application window of an STGP call for projects. Applicants submitting this resolution are strongly encouraged to use the template provided by SANDAG.

### **Nontraditional Section 5310 Project Eligible Applicants**

Eligible applicants for nontraditional Section 5310 projects are:

- Private nonprofit organizations
- State or local governmental authorities
- Operators of public transportation

Projects that may be considered traditional Section 5310 projects, but that are proposed by nontraditional applicants, are eligible for funding under the nontraditional Section 5310 project category. For example, if a state or local governmental authority does not meet the requirements to be eligible as a traditional project applicant and applies for funding for vehicle procurement, the vehicle procurement is eligible for funding under the nontraditional Section 5310 project category.

Per FTA requirements, taxi companies that provide only exclusive-ride service are ineligible applicants; however, qualified taxi companies may subcontract with an eligible applicant to perform some or most of the applicant's proposed project.

### **Section 5310 Applicant Requirements**

To be eligible for any Section 5310 project funds, an applicant must also submit its Unique Entity Identifier (UEI) so SANDAG can use the federal System of Award Management (SAM.gov) to verify that the applicant is neither suspended nor debarred from doing business with the federal government. If an applicant is already registered in SAM.gov, its UEI has already been assigned. If an applicant is not already registered in SAM.gov, the applicant is required to obtain a UEI free of charge by going to SAM.gov.

Section 5310 applicants must sign and submit the following federally required forms to SANDAG with their funding request.

#### **Eligibility Certification for Federally Funded Contracts**

By signing this form, an applicant certifies that neither it nor any of its officers or holders of a controlling interest are on the U.S. Comptroller General's list of ineligible parties for federally funded and assisted contracts.

#### **Noncollusion Affidavit/Declaration**

By signing this form, an applicant certifies that it has not engaged in collusion of any kind as relevant to the submittal of its project proposal and in accordance with 23 U.S.C. 112, and Public Contract Code Section 7106.

#### **Debarment and Suspension Certificate**

By signing this form, an applicant certifies that any person associated with the applicant (in the role of owner, partner, director, officer, or manager) has not been or is not currently under suspension or debarment or any other indictment or conviction as mandated through 49 C.F.R. 29.

### **Certification of Restrictions on Lobbying**

By signing this form, an applicant certifies that federal financial assistance may not be used to influence any member of Congress, directly or indirectly, or an officer or employee of any agency in connection with the making of any federal contract, grant, or cooperative agreement as imposed by 31 U.S.C. 1352.

### **Subapplicant's Statement of Eligibility**

By signing this form, an applicant certifies that it either has no listed subapplicants in its application or if it does, that each proposed third-party contractor is not debarred, subject to trade restrictions with the United States government, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in any federal grant by any federal department or agency.

### **Senior Mini-Grant Eligible Applicants**

Applicants that are eligible to receive Senior Mini-Grant funding are:

- Local governmental agencies
- Public transportation operators
- Tribal governments
- Nonprofit organizations
- Social service agencies
- CTSA

### **Minimum and Maximum Grant Award**

Initially, SANDAG did not set grant minimum or maximum amounts for any specialized transportation grants resulting in a wide range of grant funding amounts. On April 2, 2010, the SANDAG Transportation Committee (TC) approved setting the Senior Mini-Grant minimum grant request amount at \$30,000 per year to ensure SANDAG administrative costs for the program were reasonable, and the maximum grant request amount at \$200,000 per year to ensure that the limited funds were distributed to a variety of grants. These same grant minimum and maximum amounts were applied to the former JARC and New Freedom programs on September 2, 2011, through TC approval.

On July 18, 2014, and July 25, 2014, the TC and SANDAG Board of Directors, respectively, approved to maintain the grant request limits per grant (\$30,000 to \$200,000 per year) and additionally limit applicants to requesting no more than \$500,000 per year per grant program through the funding allocation process. This modification accompanied a reformatting of the application to allow applicants to submit multiple projects in the same application.

On July 17, 2020, the TC recommended and on July 24, 2020, the Board of Directors approved increasing the maximum grant awards per project to \$250,000 per year per funding cycle and the maximum grant award per applicant to \$600,000 per year per funding cycle. On June 17, 2022, the TC recommended and on July 24, 2022, the Board of Directors approved raising the minimum grant award from \$30,000 to \$50,000, eliminating the minimum and maximum grant award requirements, and retaining the maximum grant award per applicant per funding program.



## Eligible and Ineligible Uses of Funds

### Net Project Cost

Grant funds are eligible to be used toward the net cost of a project. Net project cost is defined as that part of a project that reasonably cannot be financed from revenues generated through the project. The following definitions apply to calculations of net project cost.

- Project expense is an expense associated with an organization's daily operations, which includes the costs necessary to operate, maintain, and manage a transportation project. Project expenses may include wages, office supplies, mileage costs, etc.
- Project revenue is income that an organization receives from operating a transportation project. Project revenues may include registration fees; other user fees; or fare, including ride-based donations
- The net project cost is calculated by subtracting project revenue from project expenses

### Unallowable Costs

Per FTA Circular 9070.1G, the FTA prohibits Section 5310 program funds to be expended on transit passes or vouchers for use on existing fixed-route or ADA complementary paratransit service. Transit passes include monthly passes, single fares, and multi-trip tickets. Direct vehicle operating expenses are ineligible for reimbursement under both the Section 5310 and Senior Mini-Grant programs. These costs include, but are not limited to, the following: fuel, tires, oil, repairs, wear items (e.g., tires, breaks, mufflers), preventative maintenance, parts, license and registration renewal fees, insurance, and storage fees. Instead, the reimbursement for vehicle operations is done on a per-mile basis at a rate up to the current Internal Revenue Service mileage reimbursement rate for operating projects. The Program Requirements section of Chapter 4 discusses allowable and unallowable costs in greater detail.

### Indirect Costs

Indirect Costs are costs incurred for common or joint objectives that cannot be readily assigned to a specific grant, contract, or other activity. An Indirect Cost Rate is a fair and convenient mechanism to determine what proportion of Indirect Costs a specific grant or activity should bear. An Indirect Cost Rate is the ratio between the total indirect expenses and some direct cost base. The Indirect Cost allocation methods used by an organization depend on its structure, program functions, and accounting system.

Indirect Costs are eligible expenses through the STGP if an applicant includes a proposed Indirect Cost Rate in its application for funding and that Indirect Cost Rate does not exceed the applicant's Federally Negotiated Indirect Cost Rate (FNICR). If the applicant does not have a FNICR, the applicant may request the de minimis rate as allowed by 2 C.F.R. 200: Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance). An applicant that includes its FNICR in its application must submit documentation from the applicant's federal cognizant agency approving the applicant's FNICR.

### School Bus Transportation

Per Title 49 U.S.C. 5323(f), FTA funds may not be used for exclusive school bus transportation for school students and school personnel.



## Alternative Services

Before the COVID-19 public health emergency, the Section 5310 program allowed the provision of meal deliveries to homebound individuals of the target population so long as this alternative service did not conflict with providing specialized transportation to the target population. During the COVID-19 public health emergency, both the Section 5310 and Senior Mini-Grant programs allowed provision of alternative services, including the delivery of meals, prescriptions, technological devices, and personal protective equipment to the target population. Since the federal COVID-19 Public Health Emergency Declaration ended on May 11, 2023, alternative services under the Section 5310 program became limited to meal deliveries for homebound individuals of the target population. Delivery of prescriptions, technological devices, and personal protective equipment to the target population continues to be allowable under the Senior Mini-Grant program so long as these alternative services do not conflict with providing specialized transportation to the target population. Applicants that intend to provide alternative services must include the proposed alternative services in their application. Grantees that have capital and operating projects may not use STGP-grant funding for alternative services if the delivery of these services conflicts with providing specialized transportation to the target population.

Table 3.3

Allowable Operating and Capital Project Alternative Service Deliveries by Funding Source

TransNet Senior Mini-Grant	FTA Section 5310
<ul style="list-style-type: none"> <li>Meals</li> <li>Prescriptions</li> <li>Technological devices</li> <li>Personal protective equipment</li> </ul>	<ul style="list-style-type: none"> <li>Meals</li> </ul>

## Vehicle Costs and Specifications

SANDAG uses the California Association for Coordinated Transportation (CALACT)/Basin Transit (BT) Vehicle Purchasing Cooperative (Cooperative) to purchase new, federally-compliant, accessible vehicles on behalf of awarded applicants. Only new vehicles available through the Cooperative are eligible for grant funding. Applicants are encouraged to research vehicle classes, vendors, models, and specifications online at [CALACT's website](#) to determine the most current and appropriate vehicle(s) and specifications that meet their riders' mobility needs. Table 3.3 describes the vehicle classes offered through the Cooperative and provides a range of the number of passengers for each vehicle class. This information is subject to change based on changes to the Cooperative. Vehicle vendors can also adjust vehicles to client needs as long as they comply with gross vehicle weight restrictions and do not include Cardinal Changes that are outside the scope of the original contract and procurement issued by the Cooperative. Any vehicle that can transport over 10 people requires a Class B driver's license.

Table 3.4

Vehicle Class Information

Class	Type	Number of Passengers*
A	Cutaway Bus	8 - 10
B	Cutaway Bus	12 - 14
C	Cutaway Bus	16 - 20
D	Minivan	6
V	Transit Van	9

Class	Type	Number of Passengers*
Z-1	Electric Transit Van	4-7
Z-2	Electric Cutaway Bus	12-16

\*Number of passengers does not include the driver.

Vehicle costs vary based on the vehicle type and specifications, the vendor, taxes and fees, the availability of vehicle models and options, and the timing of the procurement. For this reason, SANDAG developed a vehicle budgeting tool based on specifications and price information from the CALACT/BT Vehicle Purchasing Schedule. SANDAG requires applicants with proposed vehicle projects to use the vehicle budgeting tool, which is made available with application materials during an open application window. The vehicle budgeting tool allows applicants to identify vehicle specifications, compare prices of vehicle types and options, and select vehicle type and vendor based on a best-value analysis. The vehicle budgeting tool is based on the most recent specifications and prices available through the Cooperative. Actual vehicle offerings and costs may vary due to changes in the Cooperative.

Per the Section 5310 program, the FTA requires that an in-plant inspection and resident inspector's report be completed when more than 10 vehicles of the same model that are not unmodified vans are purchased by a subrecipient to comply with Buy America requirements. If an applicant is applying for more than 10 vehicles of the same model that are not unmodified vans, the proposed budget must include the estimated cost of \$5,000 for an in-plant inspection and resident inspector's report. Chapter 4 discusses vehicle procurement procedures in greater detail.

## Match Requirements

### Minimum Match Percentage

The Minimum Match Percentage is the required minimum amount of the net project cost that must be supplied through local, matching funds. Applicants may supply more than the minimum required matching funds. The Minimum Match Percentage varies by funding source and project type as summarized by Table 3.4.

Table 3.4

#### Minimum Matching Funds Requirements by Funding Source and Project Type

Project Type	FTA Section 5310	TransNet Senior Mini-Grant
Capital	10-20%*	N/A
Mobility Management	20%	20%
Operating	50%	20%

\*For capital projects involving the purchase of vehicles, federal funds can be used to support 85% (85% grant/15% match) of the net vehicle cost if the vehicle(s) will comply with the requirements in 49 C.F.R. Part 38. The federal share is 90% (90% grant/10% match) of the net cost of acquiring vehicle-related equipment or facilities that are on and attached to a vehicle, including clean fuel or alternative fuel vehicle-related equipment or facilities, for purposes of complying or maintaining compliance with 42 U.S.C. 7401 et seq. or required by the Americans with Disabilities Act (ADA).

### Allowable Sources of Matching Funds

Both the Section 5310 program and Senior Mini-Grant program have restrictions on the source of matching funds as outlined in Table 3.5 and discussed in the following section.

Fare revenue or user fees generated through a capital project may not be used as matching funds for operating or mobility management projects. Additionally, other DOT funds may not be used as matching funds for any project funded through the Section 5310 program. Moreover, matching funds for capital projects that involve the purchase of equipment such as vehicles must be cash, provided to SANDAG upon execution of a grant agreement, and not sourced from TransNet Senior Mini-Grant funds. Income from contracts to provide human service transportation may be used either as revenues (which reduces the net project cost) or as match funds for operating projects. In either case, the cost of providing the contract service is included in the total project cost. Applicants are required to provide adequate documentation in their application(s) that matching funds have been or will be secured and that the match source(s) identified is/are stable. Applicants that include in-kind contributions as a source of matching funds must provide documentation showing how the fair market value of those in-kind goods and services was derived.

**Table 3.5**

**Allowable Sources of Matching Funds by Funding Source**

FTA Section 5310	TransNet Senior Mini-Grant
<ul style="list-style-type: none"> <li>• State or local appropriations</li> <li>• Federal funds that do not originate from the U.S. Department of Transportation and are eligible to be expended on transportation</li> <li>• TransNet Senior Mini-Grant funds</li> <li>• Private donations</li> <li>• Revenues from service contracts</li> <li>• Donations, volunteered services, or other in-kind contributions</li> <li>• Income from contracts to provide human service transportation</li> </ul>	<ul style="list-style-type: none"> <li>• Any source other than TransNet revenues, including revenue from human service contracts and federal funding through the Section 5310 program</li> </ul>

#### Other Project Eligibility Requirements

#### Project Service Area Requirements

The Section 5310 and Senior Mini-Grant programs have differing geographical boundaries for project eligibility. For the Section 5310 program, only those projects within the large, urbanized area of San Diego County are eligible to receive Section 5310 funds through SANDAG. The gray-shaded areas of the map shown in Figure 1.1 (in Chapter 1) represent the large, urbanized area of San Diego County as defined by U.S. Census Bureau, Census 2020, the most recent census for which urbanized area data was available. During the call for projects, SANDAG provides a large, urbanized area map of San Diego County that reflects the most recently available decennial census data. For regional Section 5310 projects that have service areas outside of the large, urbanized area of San Diego, eligible organizations may apply through Caltrans for the statewide competition for small urban and rural Section 5310 funds. Prospective applicants are encouraged to contact SANDAG staff if their proposed Section 5310 grant(s) would contain a service area that is both within and outside the large, urbanized area of San Diego County. The Senior Mini-Grant program funds specialized transportation projects within San Diego County.

During the call for projects, applicants are required to submit a detailed service area map for each proposed project with sufficient information to delineate the boundaries of each proposed project's service area. This information is not only used to determine project eligibility, but also to conduct a Social Equity Analysis discussed in Section 3.4. Per federal Title VI requirements, Section 5310 applicants must also indicate whether each proposed project would provide service to predominantly minority populations in the proposed service area.

### **Coordinated Plan Requirement**

As mentioned earlier, MAP-21 and the FAST Act state that projects funded through the Section 5310 program must be derived from a locally-developed Coordinated Plan. SANDAG requires all grants through the STGP to be derived from either the Very-High or High Priority Strategies for funding prioritization outlined in the SANDAG Coordinated Plan. During a call for projects, applicants must describe how each proposed project is derived from these Very-High or High Priority Strategies to be considered eligible for STGP funding.

### **Eligible Target Population and Needs Accommodation Policy**

The Section 5310 program and Senior Mini-Grant program have different requirements for the target population that can be served. The target population for Section 5310 projects are people age 65 and older and individuals with disabilities. The target population of Senior Mini-Grants is people age 60 and older.

To preserve the intent of these programs in addressing the transportation needs of the specified populations outlined above, SANDAG established a Needs Accommodation Policy. This policy affords the opportunity for coordination among transportation providers that may reduce duplicative transportation service and allow passengers on services funded through the STGP to travel with companions. Under the Needs Accommodation Policy, three requirements must be met for projects to be funded through these programs:

1. Project is specifically designed to meet the special needs of the target population
2. At least 80% of the project's beneficiaries are members of the target population
3. Project benefits are prioritized for the target population

For passengers that require Personal Care Attendants (PCA), the PCA's trip counts as neither a target population trip nor a non-target population trip if at least 80% of total ridership is accounted for by the target population. Personal care attendants are considered neither incidental users nor members of the target population. However, people who are solely accompanying older adults or disabled passengers (not for care purposes) are incidental service users.

### **SANDAG Board Policy No. 035 Resolution**

Per Board Policy No. 035, applicants submitting one or more funding requests for Section 5310 or Senior Mini-Grant funds are required to submit a resolution from the applicant's governing body that:

1. Commits the applicant to provide the amount of matching funds per grant that adheres to the Minimum Match Percentage
2. Authorizes applicant staff to accept the grant funding and execute a grant agreement if an award is made by SANDAG

Applicants must submit this resolution by the deadline specified in Board Policy No. 035. Failure to provide a resolution that meets the requirements results in rejection of the application. SANDAG includes a resolution template in the call for project application materials. Applicants may tailor this template to add information, but all statements from the template are required.

### Third-Party Contracting

If an applicant is awarded grant funding and executes a grant agreement with SANDAG for the awarded grant funding, the applicant may choose to contract services under the grant agreement to a qualified third-party entity.

## 3.2 Eligibility Review Phase

Staff conducts an eligibility review of all submitted applications and forwards applications deemed eligible to evaluators to review and score. The following sections describe the eligibility review process.

### Application Responsiveness Determination

Once the application window closes during a call for projects, staff evaluates submitted applications for responsiveness. An application is considered responsive if it conforms to the eligibility requirements outlined in Section 3.1 and the instructions set forth in the call for projects. If an application is deemed nonresponsive, staff notifies the applicant in writing, states the document(s) or other information that was missing from the application submission, and provides instructions on how applicants can protest the nonresponsive determination. Unless a protest is filed and substantiated, an application that was deemed nonresponsive does not continue in the competitive selection process.

Examples of instances when an application would be deemed nonresponsive include, but are not limited to, the following:

- Applicant is suspended or debarred from doing business with the federal government
- Applicant is a for-profit organization
- Proposed project is not derived from the Very-high and High Priority Strategies outlined in the Coordinated Plan
- Applicant fails to provide a scope of work or budget
- Service area of the proposed Section 5310 project is not within the urbanized area of San Diego County
- Proposed project is not a capital, mobility management, or operating project
- Proposed project does not meet the requirements of the Needs Accommodation Policy

### Notice to Cure Application Deficiencies

During the eligibility review phase, staff also checks responsive applications for consistency with the call for project instructions and accuracy of submitted data and information. SANDAG may provide applicants with identified deficiencies an opportunity to correct or cure their applications. If staff identifies application deficiencies that applicants may cure without impacting the competitive process, staff sends a notice to cure application deficiencies in writing. This notice identifies the application deficiencies, states the correction needed, and provides a deadline for applicants to correct the deficiencies. If an applicant fails to correct the identified deficiencies by the deadline stated in the notice, the applicant's application does not continue in the competitive selection process.

Examples of application deficiencies that could be identified include, but are not limited to, the following:

- Applicant exceeds any space or page limit, or formatting requirement specified in the call for projects instructions
- Applicant does not submit a required form, misses a signature, or leaves a required form undated

- Applicant proposes certain activities that are inconsistent with the proposed project type
- Applicant proposes certain project costs that are unallowable
- Applicant includes proposed performance indicators in its application, but they are inaccurate or inconsistent across submitted application materials

### 3.3 Application Evaluation and Scoring Phase

In the eligibility review phase, submitted applications are reviewed to determine if one or more proposed projects can be awarded STGP funding. In the evaluation and scoring phase, submitted applications are scored based on evaluation criteria approved by the Board of Directors to determine how limited STGP funding should be allocated and how proposed projects should be prioritized.

#### Evaluation Criteria

As mentioned earlier, the Board of Directors is responsible for approving evaluation criteria used to score applications submitted in response to a call for projects. The evaluation criteria approved by the Board of Directors for the STGP Cycle 12 Call for Projects are available through the STGP web page. Evaluation criteria are subject to change based on stakeholder feedback; changes in local, state, and federal law, rules, and regulations; best practices in grant administration; and changes to STGP or SANDAG goals and objectives. The evaluation criteria approved by the Board may include both qualitative and quantitative criteria.

Qualitative or subjective criteria are those criteria in which discretion is needed to provide a score. Often qualitative criteria seek to evaluate how well an applicant will respond to an application question or how well the proposed project will achieve a stated goal.

Quantitative or objective criteria are those criteria in which a formula or conditional statement are used to provide a score. Often quantitative criteria seek to evaluate a project-related data point or metric against a range or scale and assign a point value based on where the data point or metric falls within the range or scale. Other quantitative criteria assign a point value based on responses to a conditional statement such as a yes/no question or the presence or absence of a condition.

#### Past Performance Adjustment

A Past Performance Adjustment is a method that connects information on an Applicant's recent performance on one or more prior STGP grants to the Applicant's proposed grant(s) through the call for projects. It is intended to discourage poor performance and reward strong performance.

Past Performance Adjustment scores are based on an assessment of an Applicant's performance during a review period. Applicants that have never held an STGP grant or applicants that have not held an STGP grant within the Past Performance Adjustment Review Period would not receive a Past Performance Adjustment. Additionally, if the duration of an STGP grant that occurred in the Past Performance Review Period was three months or fewer, SANDAG would exempt this grant from the calculation of the Past Performance Adjustment score due to insufficient performance data.

SANDAG staff uses a standardized monitoring checklist to monitor grantee compliance with its STGP grant agreement(s) as indicated in Chapter 5. Consistent with this monitoring checklist, staff would determine Past Performance Adjustment scores based on three indicators and weights: 1) Grantee Compliance, 2) Units of Service Delivered, and 3) Grant Agreement Compliance.

An Applicant would receive a Past Performance Adjustment score for each STGP grant it has held within the Past Performance Adjustment Review Period. If an Applicant has two or more STGP grants of the same grant type within the Past Performance Review Period, an average of the Past Performance



Adjustment scores would be calculated so that the Applicant would receive one Past Performance Adjustment score by grant type. If an Applicant has held an active STGP grant of one grant type within the Past Performance Review Period but is applying for grant funds under a different grant type, then the Past Performance Adjustment score would be based only on the first indicator, Grantee Compliance. Past Performance Adjustment scores would range from -15 to +5 points.

## Scoring Based on Qualitative and Quantitative Evaluation Criteria

### Qualitative Evaluation Criteria Scoring

Evaluators external to SANDAG are responsible for scoring eligible applications based on the qualitative evaluation criteria. Concurrent with the eligibility review phase, staff seeks qualified members of the public to serve as external evaluators, who may receive compensation. Prospective external evaluators are provided the names of applicants and subapplicants, evaluator guidelines, a declaration concerning conflicts for grant program evaluators, a confidentiality agreement, and a short questionnaire to determine evaluator qualifications.

From the pool of prospective external evaluators, staff select at least three, but no more than five external evaluators for each funding source who:

- Are familiar with the San Diego region and the STGP goals and objectives
- Have diverse expertise in fields related to specialized transportation
- Do not have a prohibited conflict with any of the applicants or proposed projects that would preclude a fair evaluation
- Agree to keep confidential information related to the call for projects protected from disclosure

Once external evaluators have been selected, SANDAG staff creates two evaluation panels, one for each funding source, and provides the evaluators resources such as:

- Evaluation criteria by reference
- Submitted application materials from eligible and responsive applicants
- An evaluator score sheet
- A scoring rubric
- Evaluator instructions on how to navigate application materials and accurately complete the score sheet using the scoring rubric
- Technical assistance that may include a guide to evaluate the practicality of a proposed cost per one-way passenger trip

Additionally, SANDAG requires evaluators to attend an evaluator training session. This training reviews the call for projects materials in depth, including the scoring rubric evaluators will use and the score sheet where evaluators will provide their scores. The training ensures that all evaluators are provided the same information, have an opportunity to ask questions, and fully understand the work they will be conducting. External evaluators are instructed to avoid scoring a response as a zero unless an applicant's response is left blank or is so incomplete or incoherent that the evaluator cannot reasonably understand or infer the meaning of the response. Furthermore, external evaluators are instructed to only evaluate applicants based on their required application content. In other words, evaluators cannot evaluate an applicant based on outside sources or application content submitted beyond what is required. For example, if an application question contains a 500-word limit, and an applicant submits a response that is 750 words, the evaluator is instructed to only read the first 500 words.



Once SANDAG staff review all submitted scores from evaluators, SANDAG holds evaluator panel meetings to discuss the applications and individual evaluator scores and encourage consensus among the evaluators. Evaluators may change their scores based on the discussion at the evaluator panel meetings but are not required to do so. SANDAG staff take notes during the evaluator panel meetings that can be provided to unsuccessful applicants following the adoption of the awards by the SANDAG Board of Directors.

SANDAG staff conduct a quality assurance/quality control (QA/QC) review of the final evaluator scores to ensure points are awarded appropriately in accordance with the evaluator instructions. Staff also request and collect general information from external evaluators on the strengths and weaknesses of applications they scored, and the usefulness and clarity of the information and resources provided to external evaluators. This information helps staff conduct debriefs with applicants after awards have been announced and enhance the evaluation phase for future calls for projects.

### Quantitative Evaluation Criteria Scoring

SANDAG staff score eligible applications based on the quantitative criteria approved by the Board of Directors. Points associated with quantitative criteria undergo a QA/QC review to ensure data used in the quantitative scoring process are accurate and points are awarded appropriately.

## 3.4 Development of Funding Recommendations

### Calculation of Total Application Scores

Once the evaluation and scoring phase is complete, each grant application receives an average qualitative score. This score is calculated by summing all evaluator scores for that grant application and dividing by the number of evaluators. The grant applicant's average qualitative score is added to the quantitative score(s), producing a total application score.

### Minimum Total Application Score

To ensure STGP funds support quality grants, a grant application must receive a total application score that is equal to or exceeds 70 points to be eligible for funding.

### Preliminary Funding Recommendations

SANDAG will develop preliminary funding recommendations in descending total application score order (from highest to lowest).

### Traditional and Nontraditional Section 5310 Projects

For the Section 5310 program, SANDAG must ensure that at least 55% of available funds are awarded to traditional Section 5310 projects. (The distinction between traditional and nontraditional Section 5310 projects is discussed in Section 3.1.) A list of traditional and nontraditional Section 5310 projects is made based on the scoring and evaluation of applications. When allocating funds, staff ensures that at least 55% of the Section 5310 apportionment is awarded to the highest-scoring traditional Section 5310 projects. Then the remaining 35% of the Section 5310 apportionment (not including the 10% of the funding used for program administration) is awarded to the highest-ranking of all remaining (traditional and nontraditional Section 5310) projects based on the total application score.

### Tiebreakers

The call for projects identifies responses to certain criteria to act as tiebreakers if two or more grants receive the same total application score.

## Quality Assurance/Quality Control Check

Preliminary funding recommendations then undergo a quality assurance/quality control check to verify the accuracy of the results based on the processes described above. Any errors are identified and corrected before the preliminary funding recommendations proceed.

## Partial Awards

Given the finite amount of funds available through a call for projects, applicants may be offered a full, partial, or no award. SANDAG will not make a partial award for an amount less than the minimum grant award amount. SANDAG handles partial awards differently based on the scalability of a project. SANDAG, at its sole discretion, determines whether a project is a Scalable Project or Non-scalable Project.

Applicants offered a partial award for a Scalable Project can choose from the following options:

1. Accept the partial award and provide additional matching funds. An applicant can compensate for the partial award by providing additional Matching Funds such that the total budget is the same as what the applicant proposed in its application. The schedule would remain the same. An applicant's proposed rates for key performance measures such as the Cost per Trip or Cost per Unit of Service would decrease since these measures are derived from the grant awards.
2. Accept the partial award and reduce the budget and schedule proportionate to the partial award. An applicant can reduce its contribution of Matching Funds toward the grant-funded service so long as the applicant still adheres to the same Match Percentage in its application, which must equal or exceed the minimum Match Percentage. The reduction in the schedule would then be proportionate to the reduction in the budget. An applicant's proposed rates for key performance measures would not change with this option.
3. Accept the partial award, reduce the budget proportionate to the partial award, and keep the proposed schedule. An applicant can reduce its contribution of Matching Funds toward the grant-funded service so long as the applicant still adheres to the same Match Percentage in its application, which must equal or exceed the minimum Match Percentage. Consistent with Option 2, the total budget would be reduced proportionate to the partial award. This option, however, differs from Option 2 in that the applicant would keep the schedule it proposed in its application.
4. Decline the partial award.

Applicants offered a partial award for a Non-scalable Project can choose from the following options:

1. Accept the partial award and provide additional matching funds. An applicant can compensate for the partial award by providing additional Matching Funds such that the total budget is the same as what the applicant proposed in its application. By selecting this option, an applicant would be required to complete the entire project as proposed in its application, including key performance deliverables, within the proposed project schedule.
2. Decline the partial award.

SANDAG will notify applicants offered a partial award if their projects are scalable or non-scalable. An applicant offered a partial award must notify SANDAG in a timely fashion of its preference based on the options listed above for partial awards. If an applicant does not notify SANDAG by the date and time indicated in the SANDAG notice, the applicant will forfeit the partial award. An applicant that accepts a partial award must work with SANDAG staff prior to grant execution to make any necessary changes to the proposed grant scope of work, budget, and schedule that reflect the partial award. If an applicant forfeits or declines a partial award, the award will be offered to the grant with the next highest total

application score that meets the minimum total application score requirement. If no applicant accepts the funding, the funding will be kept within the grant program and may be rolled over to future funding cycles.

#### Social Equity Analysis of the Section 5310 Funding Recommendations

Once the preliminary funding recommendations are prepared, staff conducts a social equity analysis of the Section 5310 funding recommendations per FTA Title VI and Environmental Justice requirements to determine whether the Section 5310 funding recommendations carry a Disparate Impact for People of Color (POC) or a Disproportionate Burden for Low-income Populations. The social equity analysis uses population and geo-spatial data to compare program effects between the social equity population and the total population for the Section 5310 program as a whole. If a potential Disparate Impact or Disproportionate Burden is found, SANDAG conducts an additional investigation and considers alternatives and mitigation that would reduce the impact or burden.

#### Notice of Intent to Award

The proposed Senior Mini-Grant funding recommendations are presented to the ITOC, which maintains oversight of the TransNet Senior Mini-Grant program. The proposed STGP funding recommendations are also presented to the TC, which has purview over both the Senior Mini-Grant and Section 5310 programs, and is asked to recommend that the SANDAG Board approve the funding recommendations. Staff emails a Notice of Intent to Award to all grant applicants before or concurrent with the publication of the TC staff report.

#### Protest Procedures

Protests relating to the intent to award must be filed in writing within seven calendar days of the Notice of Intent to Award date. The written protest must set forth detailed grounds for the protest and be fully supported with technical data, documentary evidence, names of witnesses, and other pertinent information related to the subject being protested. The protestor must allege or establish a clear violation of a specific law, rule, regulation, or policy that applies to SANDAG. The complete Protest Procedures applicable to SANDAG grant programs are available on SANDAG's [grants web page](#).

#### Awards and Funding Contingency List

Pending the recommendation of the TC and the outcome of any valid and timely protests, the Board is asked to approve the proposed funding recommendations and authorize staff to execute grant agreements with applicants whose projects are recommended for funding. If an applicant is unable to use its awarded funds on its selected project(s) or if additional Senior Mini-Grant or Section 5310 funding become available, staff will follow the procedures in Section 5.1 of SANDAG Board Policy No. 035. Upon approval by the Board of Directors, the awards become final.

# Chapter 4:

## Project Implementation and Program Requirements

If awarded funds, an applicant enters into a grant agreement with SANDAG for the approved scope of services and becomes a “grantee” or “subrecipient.” An applicant awarded funds for one or more vehicles will enter into a vehicle lease agreement with SANDAG and any third-party contractors that will operate the vehicle(s). Aside from any potential errors or omissions, the terms of the agreements are in substantially the same form as those in the sample agreements and are non-negotiable. The templates for the Section 5310 and Senior Mini-Grant grant agreements as well as the vehicle lease agreement are included as appendices. Upon Board of Directors approval of the funding awards, SANDAG staff and successful applicants conduct post-award activities to prepare for the execution of one or more grant agreements and if applicable, one or more vehicle lease agreements. The following sections describe these post-award activities and detail program requirements necessary for implementation.

### 4.1 Project Implementation

Once the Board of Directors approves the proposed funding recommendations, SANDAG staff emails all applicants with the outcome of the call for projects. SANDAG staff also emails applicants whose projects were awarded funding with a summary of post-award information and activities to prepare for grant agreement execution and implementation. Post-award information and activities conducted by successful applicants and SANDAG are discussed in the following sections.

#### Successful Applicant Risk Assessment

Consistent with 2 C.F.R. 200.332(b), SANDAG evaluates each Section 5310 successful applicant’s risk of noncompliance with federal statutes, regulations, and the terms and conditions of the grant agreement to determine the appropriate level of performance monitoring. SANDAG has extended this practice to Senior Mini-Grant successful applicants for consistency across the STGP. Risk factors may include, but are not limited to, the following:

- Successful applicant’s prior experience with the same or similar services
- Results of prior audits, including a Single Audit, if applicable
- Substantial changes in personnel or systems
- Extent, timing, and results of SANDAG performance monitoring
- Size, complexity, or newness of the award
- Inherent risks to people or property

During the post-award phase, SANDAG staff gathers information for the successful applicant’s risk assessment by reviewing submitted application materials, reviewing public information on the Single Audit Clearinghouse and Federal Awardee Performance and Integrity System as applicable, and contacting successful applicant staff for any additional information needed. Based on this information, SANDAG staff then categorize the awards as high, medium, or low risk. The results of this risk assessment may inform the level of performance monitoring SANDAG conducts, and any specific conditions added to the grant agreement to mitigate high risks.

## Required Forms

Section 5310 and Senior Mini-Grant awarded applicants are required to sign and submit the Equal Employment Opportunity Certificate. Section 5310 awarded applicants are required to sign and submit additional forms. These forms, which successful applicants must complete to execute a grant agreement with SANDAG, are described below and are available as grantee resources online at [SANDAG.org/STGP](https://www.sandag.org/STGP).

### Section 5310 and Senior Mini-Grant Awarded Applicant Required Form

#### Equal Employment Opportunity (EEO) Certificate

By signing this form, an awarded applicant certifies that their organization will provide equal employment to all people, without regard to race, color, religion, sex, national origin, or any other class of persons protected by state or federal law. Awarded applicants agree to comply with the federal EEO requirements of Title VII of the Civil Rights Act of 1964, the SANDAG EEO Program, the California Fair Employment Practices Act, and any other applicable federal and state laws.

### Section 5310 Awarded Applicant Required Forms

Section 5310 awarded applicants are required to sign and submit additional forms. These forms, which successful applicants must complete to execute a grant agreement with SANDAG, are described below and are available as grantee resources online at [SANDAG.org/STGP](https://www.sandag.org/STGP).

#### Buy America Certificate

By signing this form, Section 5310 awarded applicants with one or more vehicle grants agree to comply with the federal Buy America requirements in 49 U.S.C. 5323(j) and the regulations in 49 C.F.R. 661 et seq. An awarded applicant that does not have a vehicle grant does not need to complete this form.

#### Indirect Cost Rate Certification Form

By signing this form, an awarded applicant that selected the de minimis indirect cost rate in its application agrees to comply with the indirect cost rate requirements specified in 2 C.F.R. 200. An awarded applicant that did not select the de minimis indirect cost rate does not need to submit this form.

## Third-Party Contractors

During the application window, applicants are required to identify any known third-party entities with which they intend to subcontract services. Additionally, Section 5310 applicants are required to complete the Subapplicant's Statement of Eligibility. During the application window, however, applicants may not be able to identify proposed third-party entities due to the uncertainty of the outcome of the funding allocation process. If a third-party entity was not identified in an applicant's submitted application and if, during the post-award phase, the awarded applicant intends to use a third-party contractor by grant execution, the awarded applicant must conduct certain activities stated in the third-party contracting section of Program Requirements.

## Title VI Program

Section 5310 awarded applicants are required to have a Title VI Program accepted by SANDAG and approved by their governing bodies prior to the execution of a Section 5310 grant agreement. Title VI Program requirements are discussed in Section 4.2: Program Requirements.

## Insurance

Before non-governmental awarded applicants can execute a grant agreement with SANDAG, they must demonstrate that they have procured policies of insurance that comply with the insurance provisions included in the grant agreement. Insurance requirements are discussed in Section 4.2: Program Requirements.

## Vehicle Procurement Grant Execution

SANDAG purchases accessible vehicles on behalf of Section 5310 grantees through the CALACT/BT Purchasing Cooperative (Cooperative). As mentioned earlier, Section 5310 applicants that propose vehicle projects are required to use the vehicle budgeting tool, which seeks to minimize the variance between the total vehicle costs estimated in the grantee's application and those quoted by a vehicle vendor. Before grant agreements are executed, awarded applicants and SANDAG work with vehicle vendors under the Cooperative to ensure the vehicle purchased conforms to the specifications listed in the vehicle budgeting tool the grantee submitted at time of application. SANDAG will also verify the costs included in the final vendor quote conform to the prices listed in the CALACT/BT Purchasing Schedule and that taxes and fees have been applied appropriately. If there are discrepancies between the quote and the CALACT/BT Purchasing Schedule or vehicle budgeting tool, SANDAG will work with vehicle vendors and awarded applicants, if necessary, to resolve them.

If the quoted cost of the vehicle is less than the total cost listed in the application budget, the grant award will be reduced such that grant funding covers only 80% of the actual vehicle cost consistent with program requirements, unless the vehicle qualifies for a higher grant percentage. The awarded applicant will be responsible for the remaining cost. If the quoted cost of the vehicle is higher than the total cost listed in the application budget, the awarded applicant will be responsible for the difference between the quoted cost and the grant award.

Once SANDAG and the awarded applicant verify the accuracy of the vendor quote and confirm the final award amount and match amounts, SANDAG adds this information to the Section 5310 grant agreement. SANDAG then presents the Section 5310 grant agreement and vehicle lease agreement to the awarded applicant. Consistent with the vehicle lease agreement, the grantee is the registered owner of the vehicle(s) and SANDAG is the lienholder of record. If an awarded applicant wishes to use a third-party contractor to operate one or more awarded vehicles, the awarded applicant must seek prior SANDAG approval and execute a vehicle lease agreement signed by the third-party contractor, the awarded applicant, and SANDAG. Vehicle purchasing procedures after Section 5310 grant agreement and vehicle lease agreements have been executed are discussed in Section 4.2.

## Regional Transportation Improvement Program

Once the Board of Directors awards grant funding, the funded grants must be programmed into the RTIP before SANDAG can execute grant agreements with awarded applicants and obligate grant funds through the FTA. As the designated recipient of Section 5310 funds, SANDAG has pre-award authority, meaning SANDAG can execute Section 5310 grant agreements with awarded Section 5310 applicants before SANDAG has obligated Section 5310 funds with the FTA. SANDAG can exercise its pre-award authority only after it certifies that all programmatic and administrative responsibilities have been met, including the programming of Section 5310 grants into the RTIP. TransNet funds awarded to Senior Mini-Grants are available once grants are programmed into the RTIP.

## Successful Applicant Webinar

After the award of funding, SANDAG hosts a Successful Applicant Webinar for awarded applicants. The webinar is designed to review Section 5310 and Senior Mini-Grant program requirements, contractual



obligations, and SANDAG grant implementation procedures. During the webinar, SANDAG provides a comprehensive overview of topics including, but not limited to, invoicing, third-party contracting, allowable and unallowable costs, vehicle procurement, Title VI compliance, performance monitoring, and federal and local reporting requirements. The webinar offers technical assistance, providing awarded applicants the knowledge and tools to successfully implement their grants and comply with program requirements.

#### FTA Application and Award

Once Section 5310 projects are programmed into the RTIP, SANDAG applies to the FTA for the awarded Section 5310 projects and funding for SANDAG's administration of the Section 5310 program. Pending FTA approval, SANDAG enters into a grant agreement with the FTA and obligates apportioned grant funding.

#### Grant Agreement Processing and Execution

Once awarded applicants complete all necessary components of the grant agreement and, if applicable, the vehicle lease agreement, SANDAG routes the agreement(s) internally for approval. Successful applicants need to provide SANDAG the name, title, and email address of the signatory to the agreement(s) and the name and email address of the awarded applicant's project manager. The awarded applicant identifies a project manager, who maintains overall responsibility for the awarded applicant's implementation of the project and compliance with the terms of the grant agreement. SANDAG presents the grant agreement to the awarded applicant for signature once it is approved internally. Board Policy No. 035 requires awarded applicants to sign a grant agreement within 45 days of receiving it from SANDAG. Once both SANDAG and the awarded applicant sign the grant agreement, the grant agreement is considered executed, the awarded applicant becomes a SANDAG grantee, and a Section 5310 awarded applicant becomes a subrecipient.

#### Notice to Proceed and Term

Grantees cannot begin work on STGP-funded projects until they receive a notice to proceed in writing from SANDAG. Upon receipt of the notice to proceed, grantees shall begin work and are subject to the milestone requirements included in SANDAG Board Policy No. 35.

For grantees awarded funds for the continuation of a current operating, mobility management, or contract transportation services project, SANDAG issues the Notice to Proceed for the new grant agreement only after the current project closes out or the current grant agreement terminates, whichever occurs first. For grantees awarded funds that do not continue a current operating, mobility management, or contract transportation services project, SANDAG issues the Notice to Proceed to coincide with the start of the SANDAG fiscal year for the Senior Mini-Grant program or the federal fiscal year for the Section 5310 program. The SANDAG fiscal year begins on July 1 and ends June 30, whereas the federal fiscal year begins on October 1 and ends on September 30.

SANDAG maintains a responsibility to ensure the timely use of funds so that the public can benefit from project deliverables and services as soon as possible. Therefore, returning grantees with current operating, mobility management, or contract transportation service projects that are severely delayed may be ineligible or may only be eligible for only a portion of funding made available through an upcoming call for projects. Please see Section 3.1 regarding project eligibility and timely use of funds from prior funding cycles.

The grant term is the period for which the grant agreement is in effect. Beginning at the effective date and ending at the termination date, the grant term is specified in the grant agreement and summarized in Table 4.1. The term varies based on the project type and whether a project receives a partial award and is scalable.

Table 4.1  
Grant Terms by Project Type

Project Type	Estimated Grant Term (in years)
Mobility Management	2 (may be less for scalable partial awards)
Operating	2 (may be less for scalable partial awards)
Capital: Contracted Transportation Services	2 (may be less for scalable partial awards)
Capital: Class D, V, and Z-1 Vehicle Procurement	6-8
Capital: Class A, B, C and Z-2 Vehicle Procurement	7-9
Capital: Support Equipment Procurement	Varies by the Minimum Useful Life of the support equipment

The FTA does not set minimum useful life standards for federally funded equipment like it does for vehicles. Depending on the type of equipment requested and awarded through federal funds, SANDAG identifies a methodology to determine the minimum useful life. FTA Circular 5010.1E provides that the following are acceptable methods to determine the minimum useful life of federally funded equipment other than vehicles: generally accepted accounting principles, independent evaluation, manufacturer's estimated useful life, Internal Revenue Service guidelines, industry standards, SANDAG or grantee experience, SANDAG independent auditor's determination, and proven useful life standards developed at a federal test facility. Once the minimum useful life for equipment other than vehicles has been identified, the minimum useful life standard is included in the grant agreement between SANDAG and the grantee.

## 4.2 Program Requirements

SANDAG has developed a robust set of program requirements that applies to both subrecipients of Section 5310 funds and recipients of Senior Mini-Grant funds (collectively referred to as grantees). Additionally, SANDAG passes through required federal requirements to Section 5310 subrecipients. The following sections describe many of the program requirements that all grantees must comply with per their grant agreement with SANDAG, and details additional federal requirements applicable to only Section 5310 subrecipients. Templates for the Section 5310 and Senior Mini-Grant agreements as well as the vehicle lease agreement are included as appendices. Please see these templates for a complete listing of program requirements.

### SANDAG Board Policy No. 035

SANDAG Policy Board Policy No. 035 applies to projects funded through the Section 5310 and Senior Mini-Grant programs among other grant programs administered by SANDAG, it includes a "use it or lose it" policy, which requires that grantees make diligent and timely progress toward the completion of the project within the timelines set forth in the project schedule. Failure to meet project milestones and deadlines may result in the early termination of the grant agreement. Grantees may request and be granted up to a one-year, no-cost schedule extension at the SANDAG staff level, unless otherwise noted in Board Policy No. 035. For time extensions longer than what staff can grant per the policy, grantees must request and receive approval by the TC. A grantee seeking an extension must document previous efforts undertaken to maintain the project schedule, explain the reasons for the delay, explain why the delay is unavoidable, and demonstrate an ability to succeed in the extended time frame the grantee proposes. Grantees must submit extension requests to SANDAG at least three months prior to when extensions would need to be approved to allow sufficient time for review, placement on a TC agenda as necessary, and processing an amendment to the grant agreement.

## Scope of Performance

Grantees are required to implement the project as described in the scope of work, which is included in the grant agreement. Grantees are required to inform SANDAG of any changes to the scope of work during the grant period, including changes to the service area. SANDAG will determine whether the project, given these changes, is still consistent with the overall objectives of the grant program under which it is being funded (either the Section 5310 or TransNet Senior Mini-Grant program) and whether the change would have negatively affected the project ranking during the funding allocation process. Consistent with the grant agreement, SANDAG reserves the right to withhold or rescind grant funding due to substantive changes to the project. A grantee's failure to perform the scope of work or comply with the terms of the grant agreement may necessitate the grantee to complete a corrective action plan. If identified deficiencies are not sufficiently remedied within the timeframe specified in the corrective action plan, SANDAG staff will update the TC on the status of the project for its determination on continuing to fund the project. SANDAG may terminate the grant agreement at its discretion. Chapter 5 discusses SANDAG's project monitoring and reporting in more detail, including the corrective action plan.

## Project Budget

Grantees must adhere to the budget as outlined in the project description, which is included in the grant agreement. With the prior written approval of the STGP Program Manager, however, a grantee may reallocate funds between tasks in the budget as long as all of the following conditions are met:

1. The funds to be reallocated do not exceed an aggregate amount of 10% for any particular task in the budget
2. The reallocation does not negatively impact the benefits obtained from the project
3. There is no increase to the fund limit or decrease to the match percentage as shown on the first page of the SANDAG grant agreement

## Allowable and Unallowable Costs

SANDAG has adopted the cost principles outlined in Office of Management and Budget (OMB) Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (2 C.F.R. 200) when determining the allowability of costs for both the Section 5310 and Senior Mini-Grant Programs. Thus, all costs charged to STGP-funded grants must be allowable in accordance with 2 C.F.R. 200 and conform to its Cost Principles. Additionally, for the Section 5310 program, costs can be assigned as Direct Costs or Indirect Costs. The following sections detail these considerations and the allowability of common or notable items of cost.

### Cost Principles

For a cost to be allowable through the STGP, it must conform to all the following Cost Principles listed below in accordance with 2 C.F.R. 200. An allowable cost must be:

- Necessary and reasonable for the performance of the STGP project
- Allocable to the STGP project in accordance with relative benefits received
- Reasonably consistent with an organization's policies and procedures such as written allowability procedures that apply uniformly to both STGP-funded and non-STGP-funded activities
- Accorded consistent treatment
- Adequately documented
- Incurred during the grant term

These principles are discussed in more detail below.

### **Necessary and Reasonable**

For a cost to be deemed necessary, it should be generally recognized as ordinary and necessary for the operation of the grantee or for the proper and efficient performance of the grantee's grant award. The expense should fulfill a requirement of the STGP, be consistent with the STGP's programmatic purpose, and serve to meet the STGP goal and objectives. Pursuant to 2 C.F.R. 200.404, a cost is reasonable if it does not exceed an amount that a prudent person would incur under the circumstances prevailing when the decision was made to incur the cost.

### **Allocable**

A cost is allocable to an STGP project if it can be readily assigned to the STGP project in accordance with the relative benefits received. If an expense benefits two or more projects in proportions that can be determined without undue effort or expense, the cost must be allocated to the projects based on the proportional benefits each receives.

### **Consistent with the Grantee's Policies and Procedures**

A cost billed to an STGP-funded grant must be reasonably consistent with the grantee's policies and procedures, which apply uniformly to both STGP-funded and non-STGP-funded activities. In other words, a grantee may not apply a set of rules to the use of STGP grant funds that are substantially different than rules it uses to govern the expenditure of other funds such as state grants.

### **Consistent Treatment**

Consistent with 2 C.F.R. 200.403, costs must be treated consistently when determining whether they will be charged as Direct or Indirect Costs.

### **Adequate Documentation**

A cost must be supported by sufficient financial and other documentation to demonstrate its eligibility for reimbursement.

### **Incurred During the Grant Term**

For a cost to be allowable, it must be incurred during the grant term. Costs incurred outside the grant term such as pre-award expenses are not allowable.

## **Allowable Costs**

- Safety costs incurred by grantees with operating, contract transportation service, and travel training service projects to meet the requirements contained in the Safety Requirements section of Program Requirements.

### **Allowable Costs with SANDAG Prior Approval**

There are general circumstances in which prior written approval from SANDAG is required for certain costs to be allowable. These circumstances include, but are not limited to, the following:

- When any non-budgeted third-party contracts exceed the micro-purchase threshold specified in the Federal Acquisition Regulations System for supplies, equipment, or consultant services. Third-party contracting requirements are discussed in a subsequent section.
- When actual costs exceed the estimated wage rates, labor costs, travel, and other estimated costs and fees set forth in the budget.

- When grant-funded vehicles are used for activities other than providing specialized transportation service to the target population (such as meal delivery), provided these other activities are not already contained in the scope of work, do not interfere with providing specialized transportation service to the target population, and do not substantially alter the scope of work.

Grantees are encouraged to review 2 C.F.R. 200.407 when determining whether SANDAG prior approval may be needed. Grantees are encouraged to obtain prior written approval from SANDAG if they seek assurance that a given expenditure will not be the source of a compliance concern later resulting from invoice reviews, performance monitoring, or Federal Transit Administration or other audits.

### Program-Specific Unallowable Costs

There are certain costs that are specifically unallowable through the Section 5310 program, Senior Mini-Grant program, or both programs. These costs are discussed in Section 3.1.

### Selected Items of Cost

2 C.F.R. 200 contains an alphabetized list of fifty-five (55) items of cost and an indication of whether each of these items is allowable under 2 C.F.R. 200. For many items of cost, however, a determination of allowability can be nuanced. Grantees are strongly encouraged to review 2 C.F.R. 200, not only for a more comprehensive list of items of cost, but also for a more detailed review of the nuances involved when determining the allowability of costs. In a non-exhaustive list below, some common or notable items of cost have been selected for discussion of their allowability based on SANDAG guidance and 2 C.F.R. 200.

#### Advertising and Public Relations

- Allowable: Program outreach and public relations costs incurred to communicate with the public and press about specific activities or accomplishments resulting from the performance of the grant award
- Unallowable:
  - The cost of meetings, conventions, conferences, or other events related to other activities of the grantee, including:
    - The cost of displays, demonstrations, and exhibits
    - The cost of meeting rooms, hospitality suites, and other special facilities used in conjunction with shows and other special events
    - Salaries and wages of employees engaged in setting up and displaying exhibits, making demonstrations, and providing briefings
  - Costs of promotional items and memorabilia
  - Costs of advertising and public relations designed solely to promote the grantee

#### Automobile Stipend

- Unallowable: The portion of automobile costs furnished by the grantee that relates to personal use by employees (including transportation to and from work)

#### Entertainment and prizes

- Allowable: Costs for entertainment and prizes that have a specific and direct programmatic purpose such as a volunteer driver appreciation social event and are included in the grant award

- Unallowable: Expenses associated with entertainment, including amusement, diversion, social activities, and any associated costs (such as gifts) that do not have a specific and direct programmatic purpose or costs described above that were not included in the grant award

### **Food and Beverage**

- Allowable: Expenses for food and beverage except for alcohol are eligible for personal use by a grantee's employees if they are incurred as subsistence costs when travelling on official business on behalf of the grantee and participation of the individual is necessary for the grant and the costs are reasonable and consistent with the grantee's established written policy
- Unallowable: All other costs for food and beverages other than those described above; Alcoholic beverages

### **Fundraising**

- Unallowable: Costs related to organized fundraising, including financial campaigns, endowment drives, solicitation of gifts and bequests, and similar expenses incurred to raise capital or obtain contributions

### **Lobbying**

- Unallowable: Costs of influencing activities associated with obtaining grants, cooperative agreements, contracts, or loans

### **Memberships, Subscriptions, and Other Professional Activity Expenses**

- Allowable: Costs of a membership to a business, technical, or professional organization, or to a civic or community organization
- Unallowable: Costs of a membership for a country club or other social or dining club, or membership in organizations whose primary purpose is lobbying

### **Proposal Expenses**

- Unallowable: Direct costs associated with preparing bids, proposals, or applications on federal or non-federal awards

### **Legal Expenses**

- Unallowable: Legal fees or services

## **Financial Management**

All grantees must establish and maintain an accounting system and records that properly accumulate and segregate incurred costs and matching funds by line item for the grant. This accounting system may be a separate set of accounts or separate accounts within the framework of an established accounting system. Accounting systems must conform to the Generally Accepted Accounting Principles, enable the determination of incurred costs at interim points of completion, and provide support for reimbursement payment vouchers or invoices. Grantees must maintain all checks, payrolls, invoices, contracts, vouchers, orders, or other accounting documents related to the project so that they may be clearly identified, readily accessible, and available to SANDAG upon request. Grantees must establish and maintain procedures for determining the allowability of costs according to 2 C.F.R. 200 and the terms of the grant agreement. Grantees must then adhere to these procedures over the grant term. Furthermore, the grantee's financial management system must ensure effective control over, and accountability for, all funds, property, and other assets. Section 5310 grantees must adequately safeguard all project assets and assure that they are used solely for authorized purposes.



## Insurance

The following section is applicable to non-governmental grantees only. Grantees that are government agencies are not subject to these insurance requirements.

Grantees must comply with insurance provisions included in the grant agreement. Grantees are required to procure and maintain during the grant term, and for 12 months following the termination date of the grant agreement, policies of insurance from insurance companies authorized to do business in the State of California or the equivalent types and amounts of self-insurance. Per the SANDAG grant agreement, grantees are required to maintain general liability insurance with a minimum combined single limit of \$1,000,000 per occurrence and \$2,000,000 general aggregate for personal and bodily injury, including death, and broad form property damage. The general liability policy must include an acceptable "Waiver of Transfer of Rights of Recovery Against Others Endorsement" and name SANDAG as an additional insured in the endorsement. A deductible or retention may be used, subject to approval by SANDAG. Grantees are also required to maintain automobile liability insurance of an amount not less than \$1,000,000 for personal and bodily injury, including death, and property damage. Last, grantees are required to maintain workers' compensation and employer's liability insurance. The policy must comply with the laws of the State of California and include an acceptable "Waiver of Right to Recover from Others Endorsement" naming SANDAG as an additional insured.

These policies shall be primary insurance as to SANDAG so that any other coverage held by SANDAG shall not contribute to any loss under its grantees' insurance. Each insurance policy shall contain a clause which provides that the policy may not be canceled without first giving 30 days advance written notice to SANDAG. For purposes of this notice requirement, any material change in the policy prior to its expiration shall be considered a cancellation, and thus requires grantees to provide SANDAG 30 days advanced notice.

Grantees must provide satisfactory proof by one or more certificates of insurance (COIs) that they have the required insurance as described above. SANDAG uses an online management system for collecting and managing insurance certificates, as well as verifying grantees' insurance coverage. Prior to grant execution, grantees will receive notification from SANDAG's insurance management vendor requesting proof of insurance. Grantees are prohibited from starting the project until SANDAG's insurance management vendor has confirmed receipt of compliant insurance certificates. SANDAG will not provide payment prior to receipt of compliant insurance certificates and will not reimburse for expenses incurred prior to the receipt of compliant insurance certificates. As COIs must be updated annually, grantees must ensure that their insurance agent(s) comply with requests for updated information from SANDAG's insurance management vendor on no less than an annual basis. Grantees are also responsible for ensuring that their insurance agent(s) send(s) SANDAG updated COIs throughout the term of the grant agreement and that their third-party contractors are insurance compliant.

## Non-Discrimination

SANDAG includes non-discrimination provisions in the grant agreements with all grantees. These provisions are applicable to grantees awarded local TransNet Senior Mini-Grant and federal funds. The federal specialized transportation programs have additional program requirements regarding non-discrimination, which are described in more detail in the Federal Requirements subsections below. Among other provisions in the SANDAG grant agreement, grantees must include non-discrimination and compliance provisions in all contracts with third-party entities.

Grantees, and all of their third-party contractors, if any, are prohibited from unlawfully discriminating, harassing, or allowing harassment against any employee or applicant for employment because of race, color, religion, creed, national origin, ancestry, age (over 40 years), gender identity or expression, sex (including pregnancy, childbirth, breastfeeding or related medical conditions), a medical condition,

physical or mental disability, genetic information, sexual orientation, marital status, military or veteran status, or any other class protected by state or federal law. Grantees and their third-party contractors are required to ensure that the evaluation and treatment of their employees and applicants for employment are free from such discrimination and harassment. Grantees and their third-party contractors must comply with the provisions of the California Fair Employment and Housing Act (Government Code Section 12900 et seq.) and any associated regulations (California Code of Regulations, Title 2, Section 1000 et seq.). Grantees and their third-party contractors must provide written notice of their obligations under these provisions to labor organizations with which they have a collective bargaining or other agreement.

Because SANDAG receives federal funds, SANDAG must comply with federal requirements and regulations. Under its agreement with the FTA, SANDAG passes down applicable requirements to all grantees and third-party contractors regardless of funding source. Therefore, there are some federal requirements that are applicable to recipients of TransNet Senior Mini-Grant funds.

### **Third-Party Contractors**

All grantees are required to comply, and ensure compliance by third-party contractors, with Title VI of the Civil Rights Act of 1964, as amended (42 U.S.C. 2000d et seq.) U.S. DOT regulations, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act, Title 49 Code of Federal Regulations (C.F.R.), Part 21, and other nondiscrimination authorities. By complying with these provisions and regulations, the grantee agrees that no person on the basis of race, color, national origin, religion, sex, or age will be unlawfully excluded from participation in or be denied the benefits of any project for which the grantee receives federal or local funding via SANDAG. Grantees are responsible to ensure meaningful access to their transportation program by limited English proficient persons pursuant to Executive Order 13166.

### **Low-Income Populations**

Grantees are also prohibited from discriminating against low-income individuals pursuant to US DOT Order 5610.2, FTA Circular 4702.1B, and Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.

### **Equal Employment Opportunity**

The Equal Employment Opportunity (EEO) provision requires that all grantees provide equal employment to all people, without regard to race, color, religion, sex, national origin, or any other class of persons protected by state or federal law. SANDAG requires that its grantees, including Section 5310 subrecipients and Senior Mini-Grant recipients, certify their compliance with the EEO federal requirements of Title VII of the Civil Rights Act of 1964, as amended, (42 U.S.C. 2000e and 49 U.S.C. 5332) and any implementing requirements the FTA or SANDAG may issue. This certification is required prior to grant agreement execution. SANDAG does not discriminate on the basis of race, color, sex, national origin, disability, or any other class protected by state or federal law in the award and performance of any third-party contract executed under the Senior Mini-Grant and Section 5310 programs.

### **Third-Party Contracting Services**

Grantees may choose to contract services under the grant agreement to a third-party entity. Grantees are required to comply with SANDAG third-party contracting provisions outlined in their grant agreements. Additionally, Section 5310 grantees are required to comply with all federal procurement requirements and regulations, including the requirement to have and use documented procurement procedures pursuant to 2 C.F.R. 200.320.

Grantees do not need to competitively bid goods and services valued at or below the micro-purchase threshold specified in the Federal Acquisition Regulations (FAR) so long as the purchase price is fair and reasonable. For procurement of services valued over the micro-purchase threshold specified by the FAR

but below the simple acquisition threshold specified by the FAR, grantees are required to select a vendor based on a competitive selection process. For the selection process to be competitive, grantees must gather bids from a minimum of three qualified and responsive third-party vendors. Grantees should provide a clear scope of work to all bidders in order to obtain rate quotations and other pricing. The selection of a bidder should be based on a determination of best value. For formal procurement of services valued at or over the simple acquisition threshold specified by the FAR, grantees must use a formal competitive process. For all third-party contracting involving services, grantees must have a written agreement with third-party contractors to perform the desired work; and notify SANDAG of the grantee-third-party contractor relationship. Section 5310 grantees must execute debarment and suspension certificates stating that third-party contractors have not been disqualified from doing business with the federal government. Section 5310 grantees must also maintain records of these forms and make them available to SANDAG upon request. Additionally, all third-party contracting costs must be allowable and adhere to the Cost Principles in accordance with 2 C.F.R. 200. SANDAG encourages all grantees to include all SANDAG grant agreement provisions in their agreements with third-party contractors. Any third-party contract a grantee establishes for its Section 5310-funded project(s) must contain federal provisions that apply to the grantee's third-party contractor(s).

Regardless of the number of project responsibilities that grantees delegate to third-party contractors, grantees—not third-party contractors—are ultimately responsible for compliance with all applicable laws, regulations, and provisions outlined in the SANDAG grant agreement. SANDAG provides reimbursement for work performed by third-party contractors only after those expenses are incurred and paid for by the grantee.

## Ethics

Grantees must comply with all provisions in the SANDAG grant agreement and are responsible for compliance of third-party contractors at any tier. Grantees must maintain a written code of conduct or standards of conduct that shall govern the actions of its officers, employees, board members, or agents engaged in the award or administration of third-party contracts supported with funds awarded by SANDAG.

SANDAG has established policies concerning potential conflicts of interest, which apply to its grantees. Grantees are prohibited from engaging in any practices that might result in unlawful activity including, but not limited to, rebates, kickbacks, or other unlawful consideration. SANDAG and its grantees are specifically prohibited from participating in the selection process for procurement when staff members have a close personal relationship, family relationship, or past (within the last 12 months), present, or potential business or employment relationship with a person or business entity seeking a contract. It is unlawful for any contract to be made by SANDAG or its grantees if one of their respective board members or staff has a prohibited financial interest in the contract. Further, SANDAG and its grantees' officers, employees, board members, or agents cannot solicit or accept gratuities, favors, or anything of monetary value from any present or potential third-party contractor at any tier or agent thereof.

The grantee's written code of conduct must include the above provisions and penalties, sanctions, or other disciplinary actions for violation of these provisions by its officers, employees, board members, agents, or third-party contractors at any tier. If grantees have any reason to believe a conflict of interest exists with regard to their grant with SANDAG, grantees must notify the SANDAG Office of General Counsel immediately at SANDAG, 401 B Street, Suite 800, San Diego, California 92101; (619) 699-1900.

## Project Communications

SANDAG includes provisions on project communications in the Section 5310 and Senior Mini-Grant grant agreements to support SANDAG oversight of STGP projects, report on grant project status and performance to various stakeholders, and promote the grant programs and the services provided through

grant-funded projects. Project communications include, but are not limited to, media and community outreach, use of logos, outreach materials, project photographs and testimonials, and social media, which are discussed below.

### **Media and Community Outreach**

Per grant agreement provisions, grantees are required to update SANDAG on project-related events and milestones and inform SANDAG of media and community outreach efforts, including presentations to community groups, other agencies, and elected officials. Grantees are also required to provide project information to support SANDAG media and communications efforts to promote the STGP.

### **Use of Logos**

Grantees are required to use the most current SANDAG logo on promotional or outreach materials for projects funded through the STGP. Grantees must also affix the most current SANDAG logo to vehicles purchased by SANDAG through the Section 5310 program before service initiation. Grantees should follow the SANDAG grants communications guidelines, which includes guidance on the SANDAG logo selection, size, and placement. The SANDAG logo may not be used for any purpose not expressly authorized by SANDAG. Grantees may use their organization's logo on promotional or outreach materials and on vehicles purchased through the Section 5310 program. However, both the SANDAG or grantee logos should be used only to keep the public informed about specific activities or accomplishments resulting from the performance of the grant award.

### **Outreach Materials**

Outreach materials include, but are not limited to, fliers, posters, web updates, and newsletters that are used to inform the public of the STGP-funded project. For the Section 5310 program, outreach materials geared toward the target population that communicate vital information such as eligibility requirements, project enrollment information, or ways to provide feedback are considered vital documents and must be provided in English and any other languages identified in the Section 5310 subrecipient's Title VI Program. Title VI requirements for Section 5310 subrecipients are discussed in the Federal Requirements subsection. Regardless of the funding source, all project outreach materials should include SANDAG's logo and may include the grantee's logo.

### **Project Photographs and Testimonials**

Grantees that were awarded grant funding through the STGP Cycle 12 or subsequent call for projects are required to submit at least one high quality project photo and one project testimonial to SANDAG on at least a quarterly basis for the duration of each STGP-funded project. To be high-quality, project photos should be high resolution with a minimum of 300 pixels per inch and submitted electronically in a JPEG or JPG format. High quality photos are often taken in landscape mode and capture the diversity of passengers and settings grantees serve. Example photos include:

- Passengers or drivers waving
- Passengers or drivers pointing to settings/sights
- Passengers exiting/entering vehicle
- Passengers and instructors during travel training
- Background of destinations
- Staff loading vehicle with supplies
- Vehicle traveling in the distance
- Passenger and staff on phone talking to each other

- Passengers looking at transportation maps



Grantees should avoid using photo filters and watermarks that may distort the image. They should also keep any polarizing objects, such as décor with specific political affiliations, out of the shot. Project photos should be accompanied by captions with project descriptions, dates, locations, and names of those featured, if appropriate. Project testimonials should be at least 80 words and relay information provided by project beneficiaries on how the project improved their mobility and met program goals and objectives. Below are a few example testimonials.

#### Testimonial Example 1

*Mary, who is 83 years old, requests monthly rides to the cemetery where she visits her husband. We pick her up, and she recounts stories of her husband and her life with him. We drop her off, giving her space to meet with her husband. After her visit, we pick her up and take her back home, making sure she is in her house safely before leaving. Mary has told us that these visits, "mean the world to me!"*

#### Testimonial Example 2

*Earl moved to San Diego early 2022 from Savannah, GA after being diagnosed with colon cancer. He was living with his son in Chula Vista with limited means to get across the county for daily treatments. After a referral from the UCSD Oncology Social Worker, he was connected with an [STGP grantee] to provide transportation to his radiation and chemotherapy treatments through an American Cancer Society funded program... After a long recovery, Earl was excited to explore the city, but didn't know where to start... Earl was not only connected with route information through the program, but he was also paired with the Orientation and Mobility Specialist to learn to comfortably navigate public transit. Sessions included trips to the eye doctor, grocery store, and the transit store downtown to obtain a Pronto card. Earl has credited the agency with saving his life in a time when he had nowhere else to turn. Earl said [the program] has given him a sense of hope and independence that he never thought he would have. He is now a proud recipient of [grant] funded pronto cards and takes regular trips with his friends to the waterfront and Seaport Village.*



Grantees are encouraged to provide more than one photo and testimonial each quarter per grant to communicate performance and accomplishments. SANDAG reserves the right to use project photos and information provided by grantees for any combination of the following: social media posts, online photo albums, videos, press releases, PowerPoint presentations, web updates, newsletters, and testimonials. In submitting photos to SANDAG, grantees agree that the photos have been obtained with the consent of all persons featured in the photo (or that of a parent or guardian of persons under the age of 18) using a release form provided by SANDAG, or a similar release form developed by the grantee and agreed upon by SANDAG, and to release the rights of the photos to SANDAG for its use. The SANDAG media release form is available in English and other languages by contacting the SANDAG STGP program manager.

## Social Media

Grantees are encouraged to use social media to inform the public of project accomplishments and performance. When using social media to post information on STGP-funded projects, grantees should use the SANDAG grants communications guidelines available by contacting the SANDAG STGP program manager.

## Federal Requirements

As the designated recipient of Section 5310 funds, SANDAG is responsible for subrecipient compliance. Subrecipients of federal funds are subject to additional requirements beyond those applicable to grantees that receive only local funds through the TransNet Senior Mini-Grant Program. Federal requirements, applicable only to Section 5310 subrecipients, are discussed in detail below and are also outlined in the Section 5310 grant agreement template included in the appendix.

## Title VI

As mentioned earlier, all grantees are subject to Title VI requirements, including those that prohibit discrimination on the basis of race, color, and national origin, and mandate that grantees record Title VI investigations, complaints, and lawsuits. All grantees must establish and implement procedures to ensure timely resolution of Title VI complaints, and sufficiently document steps taken to investigate and address Title VI complaints. As stated previously, Section 5310 awarded applicants are additionally required to develop a Title VI Program accepted by SANDAG and approved by their governing bodies prior to grant execution. All subrecipients are also required to update their Title VI Program and seek approvals every three years. SANDAG recommends that organizations submit draft Title VI Programs or updates to SANDAG at least 60 days before final approval is required.

Table 4.2 provides a sample schedule for Title VI Program review and approvals by all involved parties. More time may be needed depending on the number of drafts and revisions required or the ability to secure a resolution from the organization's governing body approving the organization's Title VI Program.

Table 4.2

Sample Title VI Program Approval Schedule

Step	Responsible Party	Activity	Estimated Timeframe
	Subrecipient	Submit draft Title VI Program or update to SANDAG for review	60 days before final program due date or prior to the execution of a Section 5310 grant agreement
2	SANDAG	Review draft for compliance with federal requirements, providing suggested edits as needed	Within 30 days before final program due date



3	Subrecipient	Resubmit subsequent draft(s) as needed	Within 30 days before final program due date
4	SANDAG	Review subsequent draft(s) as needed	Within 30 days before final program due date
5	SANDAG	Notify subrecipient that SANDAG has conditionally accepted its Title VI Program, pending inclusion of resolution from subrecipient's governing body	Within 30 days before final program due date
6	Subrecipient	Secure resolution from subrecipient's governing body approving Title VI Program accepted by SANDAG	At least two weeks before final program due date
7	Subrecipient	Submit to SANDAG final Title VI Program with resolution and post Title VI Notice to the Public and Complaint Procedures on subrecipient's website and appropriate locations as identified in subrecipient's Title VI Program	On final program due date
8	SANDAG	Verify the necessary documents have been posted in the appropriate locations including the subrecipient's website; inform subrecipient that SANDAG has accepted its Title VI Program; and provide the deadline for the triennial update	Within one week of submission

To aid subrecipients in developing their Title VI Programs, SANDAG reviews Title VI requirements at the Successful Applicant Webinar and provides subrecipients with a guide. The following components are required to be included in organizations' Title VI Programs:

#### **Title VI Notice to the Public**

Subrecipients are required to notify the public of their protection against discrimination under Title VI. The Title VI Notice to the Public must include: (1) a statement that the subrecipient operates its programs without regard to race, color, or national origin; (2) a description of the procedures that members of the public should follow to request information on the subrecipient's Title VI obligations; and (3) a description of the procedures that members of the public should follow to file a Title VI discrimination complaint against the subrecipient.

#### **Title VI Notice to the Public Availability**

Per federal requirements, subrecipients must post or make available their Title VI Notice to the Public, at a minimum, in the following areas: the subrecipient's website, any public area of the subrecipient's office including the reception desk and meeting rooms, and transit vehicles and/or stations or stops. In their Title VI Programs, subrecipients must identify the locations where their agency has posted its Title VI Notice to the Public.

#### **Complaint Form and Procedures**

Subrecipients are required to have complaint procedures and a form through which the public may file a Title VI discrimination complaint. In their Title VI Programs, subrecipients must identify how their agencies make their complaint form and procedures available to the public, including for non-English or Limited-English Proficient speakers.

## **Record and Report Transit-Related Title VI Investigations, Complaints, and Lawsuits**

Subrecipients must include a record of any complaints or lawsuits alleging discrimination on the basis of race, color, and national origin.

## **Public Participation Plan**

Subrecipients are required to have a public participation plan that describes their strategies to market their program, encourage public participation, and perform community outreach. Subrecipients' strategies should be tailored to the unique population that they serve and should include special consideration for low-income, minority, and LEP populations.

## **Meaningful Access for LEP Persons**

Subrecipients are required to perform a Four-Factor Analysis to determine the specific language services that are appropriate for their agency to provide and develop a Language Assistance Plan based on the results of this analysis. The Four-Factor Analysis requires subrecipients to determine: (1) the number of LEP persons eligible to be served by their program; (2) the frequency with which LEP persons come into contact with their program; (3) the importance of their program to the lives of LEP persons; and (4) the resources available to the subrecipient for LEP outreach as well as the cost associated with that outreach. In addition to other resources, the SANDAG guide provides a step-by-step tutorial of how to access and report on census data to assist grantees in successfully completing Factor 1 of the Four-Factor Analysis. Additionally, if subrecipients have multiple STGP-funded projects with varying project service areas, subrecipients should use an aggregation of these project service areas to complete Factor 1 of the Four-Factor Analysis. The project service area(s) used must be consistent with what the grantee submitted during the application phase to ensure consistency with the Social Equity Analysis to the extent possible.

## **Minority Representation on Planning and Advisory Bodies**

Subrecipients that have transit-related, non-elected governing boards, advisory councils, or committees (the membership of which is selected by the subrecipient) are required to provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

## **Resolution**

Subrecipients are required to submit a resolution from their governing bodies that approves their Title VI Program.

## **Disadvantaged Business Enterprise**

Subrecipients must agree to take all necessary and reasonable steps set forth in 49 C.F.R. 26 and U.S. DOT regulation "Participation by Disadvantaged Business Enterprise (DBE) in DOT Financial Assistance Programs" to ensure nondiscrimination in the award and administration of third-party contracts. It is SANDAG policy that DBEs and small businesses have an equal opportunity to participate in the performance of contracts financed in whole or in part with FTA funds. Subrecipients must agree to cooperate with SANDAG and its DBE Program in meeting SANDAG commitments and goals regarding the maximum utilization of DBEs and small businesses.

## **Environmental Protection**

SANDAG does not foresee that any projects funded through the Section 5310 program will require additional environmental review beyond a Categorical Exclusion under the National Environmental Protection Act or a Categorical Exemption under the California Environmental Quality Act. If additional

documentation is required, SANDAG will ensure that the appropriate steps are taken so that the selected subrecipient will meet state and federal environmental protection requirements.

### **Drug and Alcohol Testing**

Section 5310 subrecipients are exempt from the FTA's drug and alcohol testing rules (FTA Circular [C] 9070.1G). If a subrecipient is awarded a Section 5310, grant and also receives funding from another FTA program (Section 5307, 5309, or 5311), which requires compliance with the drug and alcohol rules, the subrecipient should include any employee funded under Section 5310 in their drug and alcohol testing program.

Section 5310 subrecipients must comply with the Federal Motor Carrier Safety Administration (FMCSA) rule for all employees who hold Commercial Driver's Licenses (CDLs) (49 C.F.R. 382). This part applies if the CDL holder operates a "commercial motor vehicle," which means a motor vehicle having a gross combination weight rating or gross vehicle weight rating of 26,001 or more pounds, or which is designed to transport 16 or more passengers, including the driver (49 C.F.R. 382.103[a][1], 49 C.F.R. 382.107). Additionally, subrecipients must establish and implement compliance with all applicable DOT rules and regulations, including the requirements of 49 C.F.R. 655 (Prevention of Alcohol Misuse and Prohibited Drug Use in Transit Operations).

### **Audits**

A subrecipient of federal funds that expends more than \$750,000 in federal awards (through Section 5310 or other federal programs) in a given fiscal year is required to have a single audit performed for that fiscal year in accordance with 2 C.F.R. 200 unless the subrecipient elects to have a program-specific audit. If the only federal funds expended by a subrecipient are Section 5310 funds, the subrecipient may elect to have a program-specific audit. Subrecipients for whom an audit is required must submit the completed audit to SANDAG and the Federal Audit Clearinghouse within nine months of the end of the auditing period and notify SANDAG of any audit findings. SANDAG is required to issue a management decision within six months of receipt of the audit if there are findings that relate to the Section 5310 award. SANDAG works closely with subrecipients to ensure audit findings pertaining to the Section 5310 award are resolved in a timely manner.

### **Transit Asset Management Plan Required for Section 5310 Subrecipients**

The FTA's [2016 TAM Final Rule](#) applies to all capital assets owned, operated, or managed by a Section 5310 subrecipient. Based on FTA guidance, these assets include third-party owned assets operated or managed by a Section 5310 subrecipient, provided that these assets are used to provide public transportation and not exclusively "client-based" transportation services. The TAM Final Rule provided a framework for transit agencies to monitor and manage public transportation assets, improve safety, increase reliability and performance, and establish performance measures.

The rule requires a [Group TAM Plan](#), which includes an inventory of capital assets, a condition assessment of inventoried assets, a decision support tool, and a prioritization of investments and is updated every four years. It is SANDAG's goal that the asset data and analysis resulting from this Group TAM Plan will serve as a tool not only for SANDAG to better understand regional public transit assets used for specialized transportation, but also for participants to prioritize their asset needs and investments over time.

The SANDAG Financial Planning, Budgets and Grants Department will have primary responsibility for updating the [Group TAM Plan](#), coordinating with participants as well as their Accountable Executives, and performing annual TAM reporting to the National Transit Database. The SANDAG Regional Planning Department will provide support by ensuring consistency with SANDAG's Regional Plan, Regional Transportation Improvement Program, and other planning documents and helping to develop annual

performance targets. Participants will be added to the SANDAG Group TAM Plan at least once every four years if there are new subrecipients identified through SANDAG's STGP call for projects process that are subject to TAM requirements and opt-in to the SANDAG Group TAM Plan. SANDAG will document any current participants that decide to opt-out during the four-year planning horizon and require them to submit their individual TAM plan to SANDAG. Likewise, SANDAG will require any new subrecipients that are subject to TAM requirements and decide to opt-out of the SANDAG Group TAM Plan to verify they have submitted their individual TAM plans. As part of the STGP call for projects process, SANDAG will provide technical assistance to any new participants, so they are aware of their TAM responsibilities. SANDAG will also offer ongoing technical assistance to participants as needed.

Per 49 CFR 625.55, a group TAM plan sponsor is required to submit one consolidated annual data report and one consolidated annual narrative report to the National Transit Database (NTD) on behalf of its participants. The data report consists of performance targets for the following reporting year and condition assessment information from participants. The narrative report must describe any change in the condition of assets from the previous reporting year and progress made during the year to meet the performance targets set in the previous reporting year. Table 4.4 provides an implementation timeline for how SANDAG and the SANDAG Group TAM Plan participants will comply with the annual NTD reporting and target-setting requirements.

**Table 4.4:**  
**SANDAG Group TAM Plan Implementation and Reporting Timeline**

Activity	Responsible Party	Anticipated Deadline
Submit asset condition information and a description of progress made to meet the performance targets set in the previous fiscal year to SANDAG	Participants	Last business day of July
Review submitted participant data from the previous fiscal year	SANDAG	Third Monday of August
Finalize draft annual NTD report and send draft performance targets to participants for review	SANDAG	Last workday of August
Send any comments on draft performance targets to SANDAG	Participants	Second Friday of September
Send annual performance targets to participants for approval	SANDAG	First Monday of October
Approve annual performance targets	SANDAG and Participants	Third Monday of October
Submit annual performance targets and NTD data and narrative report	SANDAG	October 31

## Safety Requirements

All drivers must clear a criminal history check and driver records check before transporting members of the target population in performance of an STGP-funded project. This includes staff drivers, contracted drivers, and volunteer drivers. Drivers must not have been convicted of a felony offense involving theft, fraud, burglary, robbery, crimes against the target population, and must not have any convictions for other felony offenses within the previous ten (10) years. Moreover, drivers must have no convictions of a serious traffic violation, including but not limited to any of the following violations within the past five years:

- Reckless driving or endangerment
- Leaving the scene of an accident (hit and run)
- A suspended or revoked license for moving violations
- Driving while under the influence of drugs or alcohol
- Negligent driving

Subsequently, grantees must perform, or ensure any third-party contractors perform, a criminal history and driver records check annually for any driver who transports members of the target population in performance of an STGP-funded project. Drivers must possess a valid driver's license appropriate for the vehicle driven. Drivers shall also be physically capable of safely driving vehicles that provide service to the target population in performance of the STGP-funded project. Vehicles funded through the STGP or that provide an STGP-funded service must be deemed safe before they can be operated.

Grantees must keep records of criminal history checks, driving records checks, and valid license information on file for each driver who transports members of the target population under an STGP grant agreement. Grantees must also require their third-party contractors to maintain these records and make them available to SANDAG upon request.

Additionally, grantees that provide individual travel training to members of the target population through an STGP-funded project must retain records demonstrating that staff, contracted, or volunteer trainers have not been convicted of crimes against the target population in the previous ten years.

## Vehicle Projects: Procurement Process After Grant Execution

### Cash Match, Vehicle Purchase, and Vehicle Delivery

Upon execution of the Section 5310 grant agreement and vehicle lease agreement, SANDAG invoices the subrecipient for its required matching funds. Subrecipients are required to provide SANDAG with the required matching funds within 30 days of receipt of the invoice. Upon receipt of the cash match, SANDAG will work with CALACT/BT to purchase the vehicle(s) and notify the vehicle vendor(s) and subrecipient of the submitted purchase order. SANDAG purchases vehicles in compliance with all federal requirements for competitive procurement. Subrecipients are required to provide SANDAG with any information reasonably requested by SANDAG, which is necessary to complete the vehicle procurement process.

Additionally, in accordance with U.S. DOT regulations, all Section 5310-funded vehicles purchased through SANDAG are accessible to and useable by individuals with disabilities, including individuals using wheelchairs. All vehicles purchased through the CALACT/BT Vehicle Purchasing Cooperative are delivered directly to subrecipients. The vehicle vendor should deliver the purchased vehicle(s) within six months of the purchase date. However, supply constraints may impact the delivery timeline.

As the delivery date nears, the vehicle vendor(s) may contact SANDAG or subrecipient staff requesting information to title the vehicle(s). Subrecipients must forward any requests for titling information to SANDAG to ensure that SANDAG is listed as the lienholder and the subrecipient is listed as the registered owner. Subrecipients are also responsible for informing SANDAG if they qualify for a specialized transportation exemption for registration fees.

Additionally, shortly prior to or after vehicle delivery, vehicle vendors submit invoices, which are paid by SANDAG. SANDAG compares the invoiced amount with the purchase order contract. If the invoiced amount is higher than the purchase order contract amount, SANDAG pays only up to the purchase order contract amount. If the invoice amount is less than the purchase order contract amount, SANDAG refunds the subrecipient in proportion to the subrecipient's share of matching funds and reinvests the remaining funds in Section 5310 capital projects, unless directed to do otherwise by the FTA. For example, if SANDAG purchased a vehicle for \$50,000, the vehicle vendor invoiced SANDAG for \$45,000, and the subrecipient originally provided 20 percent of the vehicle cost in matching funds, SANDAG refunds the subrecipient \$1,000, or \$5,000 multiplied by the match percentage.

### **Post-delivery Requirements**

Once the vehicle vendor has delivered a vehicle to a subrecipient, the subrecipient is required to satisfy its post-delivery requirements for each awarded vehicle by:

- Notifying SANDAG of the delivery date
- Road-testing the vehicle
- Completing a vehicle inspection
- Certifying that the vehicle meets contract specifications
- Submitting exterior and interior photographs of the vehicle to SANDAG, including the Federal Motor Vehicle Safety Standards (FMVSS) sticker affixed to the vehicle
- Affixing SANDAG's logo to the exterior of each vehicle
- Completing a Maintenance Plan as discussed below

### **Maintenance Plan**

SANDAG must provide subrecipient oversight to ensure that all Section 5310-funded vehicles are maintained in good operating condition pursuant to federal requirements. To that end, subrecipients with one or more vehicle projects must develop and submit a draft maintenance plan to SANDAG that describes the procedures they will use to maintain vehicle(s) at a high level of cleanliness, safety, and mechanical soundness. After SANDAG reviews the draft, subrecipients must submit a final version. The maintenance plan must include the following elements:

- Preventive maintenance. The maintenance plan must outline preventative and routine maintenance that the subrecipient will perform and the frequency of which maintenance will be performed. At a minimum, the type and frequency of the preventative and routine maintenance must conform to the manufacturer's recommended maintenance schedule. Preventative and routine maintenance includes, but is not limited to, oil changes, fluid checks, tire rotation, and break checks.
- Cleaning procedures. The maintenance plan must outline the procedures that will be employed to ensure that the vehicle interiors and exteriors are clean.



- Pre-and-post trip inspections. Drivers must check that vehicle equipment and parts such as tires, break lights, horn, doors, mirrors, wipers, AC/heater, and backup sound all function properly before and after they provide trips to the target population. Pre-and-post trip inspection procedures must be included in the maintenance plan.
- ADA equipment inspections. ADA equipment such as lifts, and ramps should be deployed and inspected regularly to detect any issues. The Maintenance Plan must describe the frequency of ADA equipment inspections and procedures for fixing any identified issues.
- Training. The maintenance plan must detail how subrecipients with one or more vehicle projects provide training or otherwise ensure that drivers are proficient in the use of STGP-funded vehicles, including ADA equipment.
- Record management procedures. The maintenance plan must document how subrecipients maintain adequate and accurate vehicle maintenance records, including but not limited to, vehicle usage, inventory, routine and preventative maintenance, pre-and-post trip inspection reports, and damage reports.
- Warranty Claim Procedures. Subrecipients must actively pursue warranty claims for vehicles and equipment. The maintenance plan must document the procedures subrecipients will follow to pursue warranty claims, including timeframes for filing a warranty claim following discovery of the issue, for maintaining contact with warranty provider while the claim is processed, and for scheduling warranty repairs once the claim is approved.

Concurrently, the vehicle vendor is required to satisfy its post-delivery requirements by submitting post-delivery Buy America documentation and an FMVSS certification provided by the vehicle manufacturer.

A subrecipient with one or more vehicle projects must complete its post-delivery requirements within three months of vehicle delivery. Once SANDAG receives and approves the necessary post-delivery documentation from the subrecipient and vehicle vendor, SANDAG issues a post-delivery certificate, “accepts” the vehicle(s), and notifies the subrecipient that the vehicle(s) can be put into service. This is a necessary step for SANDAG to ensure compliance with Buy America requirements. Grantees are required to comply with all other post-delivery requirements and requests made by SANDAG and vehicles may not enter service until SANDAG issues a post-delivery certificate. To not delay service to the target population, subrecipients should put the “accepted” vehicle(s) into service as soon as practicable and no later than one month after SANDAG notifies the subrecipient that SANDAG “accepted” the vehicle(s). Subrecipients must provide SANDAG the in-service date and the beginning odometer reading within one week of putting a vehicle into service.

## Vehicle Projects: Program Requirements

As the designated recipient of Section 5310 funds, SANDAG must demonstrate satisfactory continuing control of Section 5310-funded vehicles and ensure that they are used for the purpose for which they were purchased for the entirety of their operation under the lease term. As the lienholder of each Section 5310-funded vehicle, SANDAG holds a security interest and retains continuing control of each vehicle. The lease term is the period that the vehicle(s) are to be retained in service in accordance with minimum useful life standards set forth by the FTA C 5010.1E, as amended. Vehicles are considered to have reached their minimum useful life after a specified number of years or after accruing a specified number of miles, whichever occurs sooner. The minimum useful life for vehicles based on vehicle type is included in Table 4.3.



To ensure sufficient vehicle use, SANDAG requires each Section 5310 vehicle to be in-service for a minimum of 20 hours per week until the vehicle has reached the end of its minimum useful life. In-service means a Section 5310 vehicle providing specialized transportation service to the target population. The 20-hour minimum requirement does not apply if a vehicle is unsafe to drive due to mechanical reasons and grantee staff have communicated a timeline for when the vehicle can resume service.

Further, subrecipients are required to operate grant-funded vehicles in a manner that is consistent with their original project proposal submitted to SANDAG through the funding allocation process. The misuse of a vehicle will result in an early termination of the grant agreement. If a Section 5310-funded vehicle is taken out of service for more than fourteen calendar days, subrecipients must notify SANDAG, providing SANDAG the out-of-service and anticipated in-service dates. SANDAG requires this information to accurately track a vehicle's minimum useful life since minimum useful life as measured in years is only calculated when a vehicle is in-service. Furthermore, subrecipients must notify SANDAG of any changes in conditions of the vehicle or operation of the vehicle. SANDAG, in turn, is responsible for notifying the FTA of any change in conditions, including changes in local law or litigation, which would affect the use of vehicles.

Per federal requirements, subrecipients with vehicle projects must develop and maintain a control system to ensure adequate safeguards to prevent loss, damage, or theft of Section 5310-funded property, including vehicles. Moreover, subrecipients must maintain an inventory that includes the following information for each Section 5310-funded vehicle: a description of the equipment; identification number; location, use, and condition of vehicle; and minimum useful life. Subrecipients must also maintain adequate written records for one or more vehicle projects such as preventative and routine maintenance records, pre-and-post trip inspections, insurance documents, and vehicle usage.

Subrecipients with vehicle projects are responsible for paying direct vehicle operating expenses, including fuel, tires, oil, repairs, wear items (e.g., tires, breaks, mufflers), preventative maintenance, parts, license and registration fees, and insurance. If a Section 5310-funded vehicle is damaged, lost, or stolen, and the insurance proceeds obtained by the subrecipient are insufficient to cover the loss, the subrecipient is required to provide the additional funding needed to cover the difference, or forfeit the insurance proceeds to SANDAG and FTA. Additionally, the subrecipient must request an amendment to its grant agreement with SANDAG to reduce the subrecipient's award amount and amend its project scope of work and deliverables if needed.

Responsible parties and timing for each step in the vehicle procurement process are included in Table 4.5. The vehicle procurement process as outlined in Table 4.5 must be followed unless there are extenuating circumstances outside the control of the responsible parties affecting the timing of the process. Timing may vary depending on the responsiveness of the subrecipient and vendors, number and type of vehicle being purchased, specifications or modifications required, and the availability of vehicles through the CALACT/BT Vehicle Purchasing Cooperative.

**Table 4.5**  
**Vehicle Project Procurement Process**

Responsible Party	Action item	Timeframe
SANDAG	Solicit and verify quote(s) for vehicle(s) based on specifications provided in the grant application	Anticipated within three months after the Board approves the proposed funding recommendations through a call for projects
SANDAG	Confirm quote details and match amount with awarded applicant	Anticipated within one month after SANDAG has verified vehicle quote(s)
SANDAG	Prepare and present the Section 5310 grant agreement and vehicle lease agreement to the awarded applicant	Anticipated within one month after the awarded applicant confirms the match amount
Awarded Applicant	Sign the Section 5310 grant agreement and vehicle lease agreement	Within 45 calendar days after SANDAG presents the grant agreement to the awarded applicant
SANDAG	Sign the Section 5310 grant agreement and vehicle lease agreement	Anticipated within 5 business days after the subrecipients signs the agreements
SANDAG	Send the Notice to Proceed to the subrecipient	Anticipated within 5 business days after the grant agreement is executed
SANDAG	Send invoice for matching funds	Anticipated within one month after Notice to Proceed Date
Subrecipient	Provide matching funds to SANDAG	Within two months after Notice to Proceed Date
SANDAG	Issue Purchase Order(s)	Anticipated within three months after Notice to Proceed Date
Subrecipient	Complete all required post-delivery requirements	Within one month after delivery of vehicle(s)
SANDAG	Issue post-delivery certificates and “accept” vehicle(s)	Anticipated within one month after subrecipient completes post-delivery requirements
Subrecipient	Put vehicle(s) into service and notify SANDAG	Within one month after SANDAG issuance of post-delivery certificates and acceptance of vehicle(s)
SANDAG	Issue an amendment to the grant and vehicle lease agreements to reflect the vehicle and payment information	Anticipated within two months of payment for the vehicle(s)

Responsible Party	Action item	Timeframe
Subrecipient	Operate vehicle(s) in accordance with Section 5310 grant agreement and vehicle lease agreement for the minimum useful life of vehicle(s)	<ul style="list-style-type: none"> <li>• Class D and V vehicles (light-duty transit vans) at least four years or 100,000 miles</li> <li>• Class A, B, and C buses (medium-sized, light-duty, 64 approx. 25'-35') at least five years or 150,000 miles</li> </ul>
Subrecipient	Work with SANDAG on a plan for vehicle disposition consistent with the vehicle disposition procedures	At least six months prior to the end of the minimum useful life for each vehicle
SANDAG	Issue final disposition action	No earlier than the end of the minimum useful life for each vehicle

### Data Collection Requirements

All grantees are required to collect quantitative and qualitative data about the performance of their STGP-funded project(s). The type of data collected varies based on the project type. The following section describes these data collection requirements.

### All Projects

To ensure that grantees adhere to the Needs Accommodation Policy, SANDAG requires grantees to track the following demographic data for those they serve through each STGP-funded project: (1) number of unduplicated older adults served; (2) number of unduplicated individuals with disabilities served; (3) number of unduplicated older adults served who are also individuals with disabilities; and (4) number of people served who were neither older adults nor individuals with disabilities. This data should be collected before an individual is served through an STGP-funded project to ensure eligibility requirements are met. Additionally, per Title VI requirements, all grantees must collect data on the number of individuals with Limited English Proficient (LEP) served and the primary languages of those individuals. As mentioned earlier, all grantees also are required to record any Title VI and ADA complaints during the grant term for one or more STGP-funded projects. Service quality complaints must also be tracked.

Further, grantees are required to request or otherwise ascertain the following demographic data on the specialized transportation users they serve through their STGP-funded project(s): (1) age; (2) income status; (3) race/ethnicity; and (4) wheelchair use. SANDAG has developed a client voluntary demographic data survey that grantees may use to determine the populations that are served through their project(s) and the frequency with which these populations access project services. Data received from grantees will be included in the triennial Title VI report that SANDAG, as a direct recipient, submits to the FTA for SANDAG-related activities.

As mentioned earlier, grantees are required to collect at least one high-quality project photograph as well as a project testimonial from a specialized transportation user every quarter during the grant term. Moreover, grantees should collect any data as necessary to comply with the terms of the grant agreement and perform their project scope of work(s).

### Operating and Contract Transportation Service Projects

For operating and contract transportation service projects, grantees must collect the following data to measure the quantity of service provided: (1) number of one-way passenger trips; (2) number of one-way passenger trips for alternative services; (3) number of vehicle service hours; (4) number of vehicle service miles; and (5) origin and destination data by ZIP Code. To measure the efficiency of service, grantees

must calculate the cost per one-way passenger trip and cost per vehicle service hour. See the diagram below defining one-way passenger trips for clarification. To measure the quality and impact of services provided, grantees must collect data on the percentage of riders who report that the service provided by the grantee: (1) was “good” or “excellent;” (2) met their mobility needs; and (3) removed barriers to access community resources. They must also collect, and report (1) number of trips requested; (2) number of trips completed; (3) number of trips cancelled by riders (rider no shows); (4) number of trips cancelled by grantee; (5) actual versus scheduled pick-up times; and (6) delay reasons.

### **Mobility Management Project: Information and Referral Services**

Grantees that perform information and referral services as part of their mobility management project must track the number of requests received by the grantee from individuals seeking information on available specialized transportation services in the San Diego region. Additionally, these grantees must track the number of referrals they provide to other specialized transportation providers. To measure the quality of these services provided, a grantee must collect data on the percentage of individuals seeking information on available specialized transportation services in the San Diego region who report that the information provided by the grantee was helpful, accurate, and timely.

### **Mobility Management Project: Travel Training Services**

Grantees that perform travel training services as part of their mobility management project must collect data on the: (1) number of individual and group travel trainings provided; and (2) number of trainees, including the number of trainees who are in the target population. To measure the efficiency of travel training services, grantees must collect data on: (1) the cost per individual travel training; (2) the cost per group travel training; and (3) the number of travel-trained individuals who report to the grantee that they are likely to use fixed-route transit or specialized transportation services because of the travel training. To measure the quality of travel training services, grantees must collect data on the percentage of training participants who report that they: (1) attained more knowledge about their transportation options; and (2) feel more confident in navigating and using public transit or specialized transportation services in the region following the training(s).

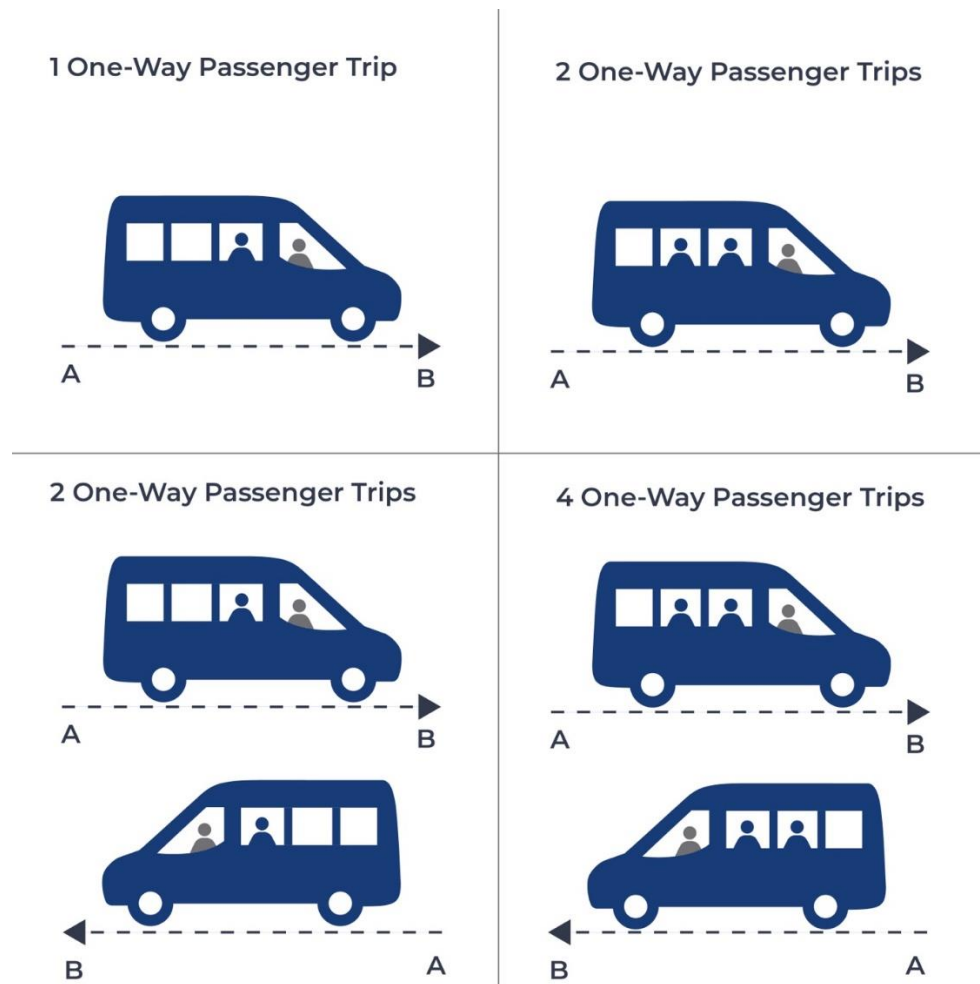
### **Mobility Management Project: Other Services**

Grantees that perform other mobility management activities as part of their mobility management project must collect data on the number of units of service provided and the cost per unit of service consistent with the scope of work. Additionally, grantees must collect data on how these activities improved coordination among public and other transportation service providers to enhance or expand specialized transportation services.

### **Vehicle Projects**

Subrecipients with one or more vehicle projects must collect the following data for each vehicle to measure the quantity of service provided: (1) number of vehicle service hours; (2) number of one-way passenger trips; (3) number of vehicle service miles; (4) beginning and ending odometer readings; and (5) origin and destination trip data by ZIP Code. To measure the quality and impact of services provided, a subrecipient with one or more vehicle projects must also collect data on the percentage of riders who report that the service provided by the subrecipient: (1) was “good” or “excellent;” (2) met their mobility needs; and (3) removed barriers to access community resources. They must also collect and report (1) number of trips requested; (2) number of trips completed; (3) number of trips cancelled by riders (rider no shows); (4) number of trips cancelled by grantee; (5) actual versus scheduled pick-up times; and (6) delay reasons.

## One-Way Passenger Trips Diagram



## Other Equipment Capital Projects

Grantees with STGP-funded equipment must collect data on how the equipment improves their specialized transportation operations to benefit the target population.

### Grantee Reporting Requirements

Grantees with operating, mobility management, and contract transportation service projects report on the performance of their projects through invoices submitted to SANDAG. Since SANDAG provides funding for these projects on a reimbursement basis, these invoices contain financial reporting, a progress report, and back-up documentation. SANDAG purchases vehicles and other equipment on behalf of grantees near the start of the grant term. Once vehicles and other equipment are delivered and put into service, grantees are required to report on these capital projects until the end of their minimum useful life using the vehicle and other equipment progress report.

There are certain reporting requirements applicable to all grantees regardless of project type, including demographic data reporting on the target population, project photos and testimonials, and complaints.



Grantees with operating, mobility management, and contract transportation service projects can invoice on a monthly or quarterly basis. Regardless of the frequency or project type, all invoices and progress reports for a given reporting quarter are due no later than one month after the end of that reporting quarter as shown in Table 4.6.

Table 4.6

#### Invoice and Progress Report Submission Deadlines

Quarter	Quarter Timeframe	Invoice and Progress Report Submission Deadlines
1	July 1 – September 30	October 31
2	October 1 – December 31	January 31
3	January 1 – March 31	April 30
4	April 1 – June 30	July 31

Grantees with operating, and capital projects that have been approved to provide alternative services must also report trips performed for alternative services during the reporting period.

If required to collect origin and destination data, grantees should aggregate any origin and destination data by ZIP Code, ranking the ZIP Codes by the highest number of trip origins or destination by ZIP Code in a reporting period. Grantees must not transmit specific origin and destination information such as home addresses to ensure any personally identifiable information is not reported to SANDAG.

#### Invoicing for Operating, Mobility Management, and Contract Transportation Service Projects

As mentioned, grantees with operating, mobility management, and contract transportation service projects must submit an invoice packet on a monthly or quarterly basis. The invoice packets excluding back-up documentation must be submitted in both Excel and PDF versions unless SANDAG transitions to an online grants management software system. If this transition occurs, SANDAG will provide detailed instructions and technical assistance to grantees. Grantees may not request reimbursement for expenses incurred prior to the project start date indicated in the grant agreement. Similarly, grantees may not request reimbursement for expenses incurred after the project close date or after the grant agreement has expired or been terminated. Invoice packets should contain an invoice cover sheet, expenses by cost category and task, a progress report, and back-up documentation for each expense item.

##### Invoice Cover Sheet

For an invoice claim to be reimbursed, the invoice cover sheet must contain a unique invoice number; the date range for which the grantee is claiming reimbursement; the date the invoice was submitted to SANDAG; and a signature certifying that expenses claimed for reimbursement were allowable, necessary, and reasonable in accordance with the grant agreement. All claimed expenses must have been incurred by the grantee; SANDAG will not prepay for expenses.

The invoice cover sheet must also allocate project costs in the reporting period to the grant, matching funds, and revenue. The amount of matching funds allocated per invoice varies depending on the required match percentage for the particular grant (e.g., 20% for operating Senior Mini-Grants) and depending on how grantees choose to allocate their matching funds over the project period. Grantees may choose to provide more matching funds up front, or “over-match”, at the beginning of the grant, and then provide fewer matching funds, or “under-match”, toward the end of the grant. Regardless, grantees must continually meet the required cumulative match percentage to receive payment for the reimbursable amount. Grantees must also indicate the match source on the invoice cover sheet and if there are substantive changes impacting the availability of matching funds through the match source.

SANDAG will not pay an invoice if the required cumulative match percentage is not met or the match source is ineligible.

### **Grant Expenses by Cost Category and Task**

Grant expenses incurred during the reporting period must be reported by cost category and task consistent with the scope of work. Section 5310 grantees that have an approved indirect cost rate applied to one or more Section 5310-funded grants must separate direct and indirect costs. This financial reporting must itemize each grant expense and must be supported by back-up documentation.

### **Progress Report**

In the Progress Report, grantees with operating, mobility management, and contract transportation service projects must provide a project narrative and performance data. The project narrative must state the activities and deliverables completed in the reporting period and describe how they benefited the target population and advanced the STGP goals and objectives. Grantees must aggregate and report on performance data for each reporting period based on the Data Collection Requirements for each project type. Grantees with operating, mobility management and contract transportation service projects should also use the Progress Report to report on collected data required of all project types. This includes demographic data and service quality complaints. SANDAG has developed a specialized transportation user demographic reporting form to help grantees report on demographic data of those they serve through their STGP-funded project(s). Performance data must be supported by back-up documentation.

### **Back-up Documentation**

Grantees with operating, mobility management, and contract transportation projects must include back-up documentation for every expense item included in the invoice, including expenses to be paid through matching funds. SANDAG encourages grantees to include a general ledger or cover page for the backup documentation that itemizes each expense, identified by task number, and allocated to either the grant or match. Expense items that do not have back-up documentation, are ineligible based on program requirements (e.g., fuel), or do not support tasks included in the scope of work are not eligible for reimbursement by SANDAG. SANDAG staff works closely with grantees to ensure that all required back-up documentation is included in submitted invoices. Back-up documentation may include payroll documents, receipts, invoices from contracted services, bank statements, or any other proof of an eligible expense incurred by the grantee as it relates to the project. As previously discussed, SANDAG does not reimburse for direct vehicle operating costs, such as fuel, tires, oil, car insurance, or car repairs. Instead, the reimbursement for vehicle operations is done on a per-mile basis at a rate up to the Internal Revenue Service mileage reimbursement rate. To receive mileage reimbursement, grantees must include a mileage log as back-up documentation. Grantees must also include documentation of matching funds and revenues collected through the project. If a grantee is using in-kind contributions as match, the value of the in-kind contribution should be calculated using the methodology the grantee provided in the grant application.

## Grantee Reporting Requirements for Vehicle and Other Equipment Projects

Grantees with vehicle and other equipment projects (property) do not submit monthly or quarterly invoices; instead, they are required to submit a vehicle and other equipment progress report every quarter from when project property is put into service until it has reached the end of its minimum useful life. Like invoices for operating, mobility management, and contract transportation service projects, progress reports for vehicle and other equipment projects must be submitted in both Excel and PDF formats, unless SANDAG transitions to an online grant management software system. If SANDAG completes this transition, SANDAG will provide detailed instructions and technical assistance to grantees.



The vehicle and other equipment progress report must contain data on the use of each item of project property collected per the Data Collection Requirements during a reporting quarter. Grantees with vehicle projects must also report on the percentage of riders who report that the service provided the grantee: (1) was “good” or “excellent;” (2) met their mobility needs; and (3) removed barriers to access community resources. The progress report must also contain inventory information on the project property, including but not limited to; an identification number; and storage location. Grantees with vehicle or other equipment projects may also use the progress report to aggregate and submit performance data applicable to all projects per the Data Collection Requirements section. SANDAG has developed a specialized transportation user demographic reporting form to help grantees report on demographic data of those they serve through their STGP-funded project(s).

Project property must be maintained in a state of good, operating condition in accordance with a maintenance plan submitted by the grantee and accepted by SANDAG. Grantees with project property are required to include their preventative and routine maintenance activities in their quarterly progress reports. Grantees are not required to submit back-up documentation of preventative and routine maintenance performed with their progress reports, but they must keep such records and make them available to SANDAG and the FTA for inspection upon request.

### Disposition of Project Property and Project Closeout

Grantees must not dispose of project property until they have received written authorization from SANDAG. Disposition of project property funded through the Section 5310 program must be conducted in accordance with federal requirements. Disposition and project closeout requirements are discussed in Chapter 6.

## Records Retention and Audit Compliance

Grantees are required to maintain all accounting records and other supporting papers for a minimum of three years from grant closeout and make them available for inspection, copying, and audit by representatives of SANDAG and auditors (which includes auditors representing the federal government, as applicable to Section 5310 projects only). Record retention requirements are discussed in greater detail in Chapter 6.

Furthermore, by signing a grant agreement with SANDAG, grantees agree to have financial, compliance, or other audits performed should SANDAG require them. If performed, these audits must comply with the provisions of 2 C.F.R. 200. Audit requirements pertaining to Section 5310 subrecipients are discussed in the Federal Requirements section of this PMP.

# Chapter 5:

## Monitoring and Reporting

As the designated recipient of FTA funds, SANDAG is responsible for ensuring subrecipient compliance with federal requirements and regulations, as well as the compliance of any third-party contractor receiving funds through SANDAG Section 5310 grants. Additionally, as an administrator of TransNet funds, SANDAG has an obligation to San Diego County taxpayers (and to the ITOC) to ensure efficient use of taxpayer money. To this end, SANDAG is responsible for reporting on the status and performance of grant-funded projects to various stakeholders, including the FTA, and ITOC, and interested members of the public. For these reasons, SANDAG conducts performance and compliance monitoring and reporting as detailed in this chapter.

### 5.1 Performance Measures

SANDAG tracks project performance against established performance measures. Some performance measures are applicable regardless of the project type (e.g., number of older adults or individuals served by STGP-funded project). Many performance measures; however, vary based on the project type. For example, cost per one-way passenger trip is a performance measure for cost-efficiency applicable to operating and contract transportation service projects, but not to mobility management projects since they do not provide one-way passenger trips. Further, deliverables and cost-efficiency rates differ among projects due to differences in project parameters. For example, a project with a predominately rural service area tends to have a higher cost per trip than a project with a predominately urban service area due to longer trips necessary to access amenities in rural communities. Because of differences among projects, SANDAG primarily evaluates individual grantees on their ability to perform the scope of work included in their grant agreement, which is based on their application for funding.

The FTA established minimum performance measures for the Section 5310 program. However, SANDAG has developed additional performance measures applicable to both the Section 5310 and Senior Mini-Grant programs. These performance measures are discussed in the following sections.

#### Section 5310 Program Measures

Under the Government Performance Results Act, the FTA is required by law to “establish performance goals to define the level of performance” and also “establish performance indicators to be used in measuring relevant outputs, service levels, and outcomes” for each of its programs. The performance measures established in FTA Circular 9070.1G for the Section 5310 program are as follows:

#### Traditional Section 5310 Projects

1. Gaps in Service Filled. Provision of transportation options that would not otherwise be available for older adults and individuals with disabilities measured in numbers of older adults and people with disabilities afforded mobility they would not have without program support as a result of traditional Section 5310 projects implemented in the current reporting year.
2. Ridership. Actual or estimated number of rides (as measured by one-way trips) provided annually for individuals with disabilities and older adults on Section 5310–supported vehicles and services as a result of traditional Section 5310 projects implemented in the current reporting year.

## Nontraditional Section 5310 Projects

1. Increases or enhancements related to geographic coverage, service quality, and/or service times that impact availability of transportation services for older adults and individuals with disabilities as a result of other Section 5310 projects implemented in the current reporting year.
2. Additions or changes to physical infrastructure (e.g., transportation facilities, sidewalks, etc.), technology, and vehicles that impact availability of transportation services for older adults and individuals with disabilities as a result of other Section 5310 projects implemented in the current reporting year.
3. Actual or estimated number of rides (as measured by one-way trips) provided for older adults and individuals with disabilities as a result of other Section 5310 projects implemented in the current reporting year.

## STGP Performance Measures

As shown in Table 5.1, SANDAG has identified key performance measures to monitor and report on STGP project performance. Due to varying project types and service parameters, not all performance measures are applicable to all projects. Table 5.1 notes the project types for which the identified performance measures are applicable and lists applicable performance targets.

Table 5.1

### STGP Performance Measures by Project Type

Performance Measure	Measurement	Project Type*						Program Performance Target
		A	B	C	D	E	F	
Number of unduplicated older adults served	Quantity of Service	X	X	X	X	X	X	N/A**
Number of unduplicated individuals with disabilities served	Quantity of Service	X	X	X	X	X	X	N/A**
Number of unduplicated older adults served who are individuals with disabilities	Quantity of Service	X	X	X	X	X	X	N/A**
Number of people served who are neither older adults nor individuals with disabilities	Quantity of Service	X	X	X	X	X	X	N/A**
Number of one-way passenger trips	Quantity of Service	X	X				X	N/A**
Number of one-way passenger trips for alternative services	Quantity of Service	X	X				X	N/A**
Number of weekly service hours	Quantity of Service	X	X				X	N/A**
Cost per one-way passenger trip	Cost-efficiency	X	X					N/A**
Percentage of riders who report that the service provided by the grantee: (1) was "good" or "excellent;" (2) met their mobility needs; and (3) removed barriers to access community resources	Quality of Service and Impact	X	X				X	90% or higher



Performance Measure	Measurement	Project Type*						Program Performance Target
		A	B	C	D	E	F	
Number of referrals provided to other specialized transportation providers	Quantity of Service			X				N/A**
Percentage of individuals seeking information on available specialized transportation services in the San Diego region who report that the information provided by the grantee was helpful, accurate, and timely	Quality of Service and Impact			X				90% or higher
Number of individual and group travel trainings	Quantity of Service				X			N/A**
Number of trainees, including number of trainees who are within the target population	Quantity of Service				X			N/A**
Cost per individual travel training	Cost-efficiency				X			N/A**
Cost per group travel training	Cost-efficiency				X			N/A**
Percentage of training participants who report that they: (1) attained more knowledge about their transportation options; and (2) feel more confident in navigating and using public transit or specialized transportation services following the training(s)	Quality of Service and Impact				X			90% or higher
Number of units of service	Quantity of Service			X		X		N/A**
Cost per unit of service	Quantity of Service			X		X		N/A**
Number of vehicle trips	Quantity of Service						X	N/A**

\* Project Types: (A represents operating projects, B represents contract transportation service projects, C represents information and referral service mobility management projects, D represents travel training mobility management projects, E represents other mobility management service projects, and F represents vehicle projects.

\*\* N/A: While performance targets are not set at the program level, grantees are required to meet the performance targets specified in their scope of work for applicable performance measures.

## 5.2 Invoice and Progress Report Review

SANDAG continually monitors the performance of individual projects by reviewing and processing invoices and progress reports. This review provides an ongoing assessment of grantee performance and may inform the level of monitoring performed during monitoring visits or desk reviews. During this review, SANDAG checks if the invoices and progress reports are complete, accurate, and submitted on-time. Complete invoice and progress report submissions include all required components such as back-up documentation, demographic and performance data, grant expenditures if applicable, and a project narrative. SANDAG also checks for accuracy and consistency, especially for performance data and grant expenses. SANDAG tracks whether invoices and progress reports are submitted on-time, and frequent late submissions will negatively affect a grantee's performance score during monitoring visits or desk reviews. Components of SANDAG's review of invoices and progress reports are discussed in the following sections.

### Financial Review

SANDAG reviews grant expenses to verify that they are allowable, necessary, reasonable, supported by sufficient back-up documentation, and were incurred during the reporting period. SANDAG also verifies that the required match amount was provided, and any indirect costs are charged as such and are consistent with a subrecipient's indirect cost rate. SANDAG also checks that the matching fund source is eligible and notes any risks to the matching fund source as reported by the grantee. Grant expenditures are tracked against the budget. Additionally, SANDAG checks that invoices are signed by an authorized representative of the grantee. If grant expenses are deemed unallowable, SANDAG informs the grantee and requests a new invoice packet submission. Repeated attempts at charging unallowable costs may negatively affect a grantee's monitoring score. If certain grant expenses are questionable, SANDAG may request an explanation justifying the expense as necessary and reasonable to perform the grant-funded project. If insufficient justification is provided, SANDAG requests that the grantee removes the questionable expenses and resubmit its invoice.

SANDAG records all relevant invoice amounts (reimbursable, match, and revenue) and progress report data (project deliverables and performance indicators) in an internal budget tracking Microsoft Excel workbook. If the invoice is approved, SANDAG staff prepares a request for payment form and then forwards the request for payment form and invoice to the SANDAG Finance Department for final processing and payment.

### Performance Data Review

SANDAG reviews quantitative performance data to verify that a grantee's actual performance meets or exceeds its proposed performance as specified in the scope of work. SANDAG checks for inaccuracies in data reporting. SANDAG also reviews the performance data to ensure that program requirements are met such as the Needs Accommodation Policy. SANDAG inputs performance data into internal trackers where performance is monitored over time, so staff can see trends and notice anomalies that may indicate one or more data reporting errors. SANDAG also reviews project narratives to ensure they are consistent with quantitative performance data, grant expenses, and back-up documentation. If SANDAG identifies inaccuracies in performance data, SANDAG notifies the grantee, provides technical assistance upon request, and asks for a revised invoice or progress report. If there is a pattern of inaccurate performance reporting, a grantee's performance score may be negatively affected.

## Compliance Review

SANDAG reviews invoices and progress reports to check grantee compliance with the terms of the grant agreement. For example, SANDAG would note if a grantee reported on its vehicle and other equipment progress report that an STGP-vehicle was out of service for more than fourteen calendar days without prompt SANDAG notification. For all projects, SANDAG verifies that any Title VI and ADA complaints noted in an invoice or progress report were originally reported to SANDAG within 72 hours of the complaint. Additionally, SANDAG checks that project property is used for the purpose for which it was originally purchased.

## 5.3 Performance and Compliance Monitoring

Beyond ongoing reviews of grantee invoices and progress reports, SANDAG conducts additional performance and compliance monitoring using a monitoring checklist during scheduled desk reviews and site visits. While conducted less frequently than invoice and progress report reviews, SANDAG's performance and compliance monitoring during desk review and site visits is more in-depth, covering more compliance review areas for grantee adherence to the terms of the grant agreement. Additionally, SANDAG conducts in-person inspections of project property to ensure project property is maintained in good, operating order in accordance with the grantee Maintenance Plan. The following sections describe SANDAG's performance and compliance monitoring.

### Monitoring Checklist

SANDAG has developed a standardized monitoring checklist to assist in the monitoring of grantees' performance in implementing STGP projects and complying with the terms of the grant agreement. The monitoring checklist is used at site visits or during desk reviews to assess the performance of the grantees and during the funding allocation process to determine a past performance adjustment to the scores of applicants who have had a SANDAG grant in the past three years. The monitoring checklist includes a quantitative assessment of the grantees' performance in operating their active project. This quantitative assessment is based on data provided by grantees through progress reports and invoices. It compares grantees' actual performance versus their proposed performance as stipulated in the scope of work.

The monitoring checklist also includes a review of grantees' technical capacity in implementing their project and their compliance with grant agreement provisions. This review encompasses many compliance areas including, but not limited to, project management, insurance, cost principles/financial management, records, schedule, invoicing and reporting, third-party contracting, Title VI and ADA compliance, and communications. For each compliance area, the monitoring checklist poses one or multiple questions that a SANDAG monitor completes with "Yes," "No," or "Not applicable." "No" responses may indicate a compliance deficiency. For the first and third indicators, the monitoring checklist poses multiple questions that an STGP Program Manager completes with "Yes," "No," or "Not applicable." "No" responses may indicate a compliance deficiency. The number of points assigned for the first and third indicators would be based on the percentage of affirmative responses to the total applicable questions.

The monitoring checklist provides space for a monitor to summarize any compliance issues or other deficiencies identified, cite the applicable section of the grant agreement, and determine appropriate follow-up actions. A completed monitoring checklist specifies the monitoring period, identifies the grant agreement for which performance and compliance monitoring was conducted, includes the date the monitoring checklist was completed, and is signed by SANDAG and grantee staff. At site visits or during

desk reviews, SANDAG and the grantee review any compliance deficiencies identified through the monitoring checklist and discuss corrective actions for these deficiencies.

#### Vehicle and Other Equipment Inspection Form

SANDAG has also developed a standardized vehicle and other equipment inspection form to assess the condition and use of project property. This form is used during site visits to physically inspect STGP-funded vehicles and other equipment. When completing this form for vehicle projects, SANDAG notes vehicle information such as the Vehicle Identification Number, odometer reading, and storage location; assesses the vehicle condition; verifies that accessibility and other equipment and parts are operational; and checks the vehicle interior and exterior for cleanliness. When completing this form for other equipment, SANDAG identifies the other equipment, assesses its overall condition, and determines if it is being used appropriately. A completed vehicle and other equipment inspection form identifies the grant agreement for the project property is covered, includes the date the inspection was completed, and is signed by SANDAG staff.

#### Site Visits and Desk Reviews

SANDAG conducts either site visits or desk reviews for all grantees with active projects in accordance with the monitoring checklist at the following intervals:

- Six months for new projects
- Annually for ongoing projects

Additional site visits or desk reviews, however, may be conducted on an as-needed basis (e.g., if SANDAG identifies a serious compliance deficiency through a review of invoices or progress reports or through other means). As stated previously, SANDAG conducts an applicant risk assessment during the funding allocation process. The results of this risk assessment may inform any specific conditions added to the grant agreement to mitigate high risks. During site visits and desk reviews, SANDAG may monitor grantee compliance with specific conditions included in the grant agreement if applicable.



If a desk review is completed instead of an in-person site visit, SANDAG may request additional records from the grantee to accurately complete the monitoring checklist and substantiate any compliance issues found. For example, at an in-person site visit, SANDAG visually inspects that a subrecipient's Title VI Notice to the Public is posted in accordance with its Title VI Program. For a desk review, SANDAG requests that a subrecipient submit photographs showing its Title VI notice posted in accordance with its Title VI Program.

During inspections of project property that occur at least every other year, SANDAG uses a vehicle and other equipment inspection form to record potential issues and opportunities for improvement, validate that the vehicle(s) or other equipment is being used in a manner consistent with the grant application submitted, and physically inspect the vehicle(s) or equipment. SANDAG also examines maintenance and inventory records and takes photographs of the project property during these inspections. The purpose of this inspection is to ensure the project property is in good working order and being used for the intended purpose(s); it is not a safety inspection.

SANDAG reviews submitted vehicle and other equipment progress reports to monitor grantee performance and determine whether grant-funded vehicle(s) or other equipment continue to be used for their intended purpose and in a manner consistent with the terms and conditions of the grant agreement. SANDAG also tracks vehicle usage data. Through review of progress reports, SANDAG verifies that grantees complete project deliverables and perform activities with grant-funded vehicle(s) or equipment that continue to be eligible under the grant program through which the grant was funded. Finally, SANDAG tracks vehicle mileage to monitor vehicle usage and the useful life of the vehicle.

## **5.4 Performance and Compliance Issues and Deficiencies**

Through reviews of invoices and progress reports, monitoring at site visits or desk reviews, and physical inspections of project property, SANDAG may identify performance or compliance issues or deficiencies. Performance or compliance issues can be remedied through technical assistance and grantee adjustments, and do not require the grantee to implement major corrective actions. Examples of such issues are slightly elevated cost per one-way passenger trips or moderately late invoice submissions. Other performance or compliance deficiencies, however, are more egregious and are areas in which the grantee is deficient in meeting its obligations under the grant agreement. Examples of performance and compliance deficiencies include an actual, cumulative cost per one-way passenger trip that exceeds the Performance Threshold in the scope of work and a pattern of severely late, inaccurate, or incomplete invoices. SANDAG identifies performance deficiencies when a grantee's actual performance is substantially lower than that agreed to under a grant agreement. For operating and contract transportation service projects, a performance deficiency includes when a grantee fails to deliver an actual cost per one-way passenger trip after six months of a project at or below the Performance Threshold, or 130% of its proposed cost per one-way passenger trip as reflected in its scope of work. SANDAG identifies compliance deficiencies when a grantee is non-compliant with the provisions of the grant agreement other than cost-efficiency and other grant scope of work performance areas. Compliance deficiencies may be identified when completing the monitoring checklist during a desk review or site visit. Compliance deficiencies may also be identified through a review of invoices and progress report, or at any point during the grant term.

If a performance or compliance deficiency is identified during the grant term, SANDAG issues the grantee a written notice to complete a corrective action plan and may provide technical assistance upon request. The corrective action plan must include a detailed description with viable action steps to remediate the deficiency. The corrective action plan must also include an implementation schedule that reflects successful remediation within six months after the notice to complete a corrective action plan was issued. Grantees are required to submit corrective action plans to the SANDAG STGP manager within 30 calendar days following the issue date of the notice to complete a corrective action plan. If a grantee's performance does not improve, SANDAG staff updates the TC on the status for its determination on continuing to fund the grant. SANDAG may also terminate the grant agreement at its discretion.

## **5.5 Ongoing Oversight**

SANDAG conducts continual oversight in addition to invoice and progress report reviews and performance and compliance monitoring to ensure the integrity of the grant programs; equitable distribution of benefit from these programs throughout the region; and adherence to all applicable federal, state, and local laws. SANDAG performs oversight as it pertains to all program requirements discussed previously. The following sections discuss in greater detail several areas in which SANDAG performs oversight to ensure compliance with grant terms and successful implementation of grant-funded projects.

## FTA Compliance

All applicable federal requirements are included in the grant agreements for subrecipients of funds through the Section 5310 program. Additionally, FTA Standard Federal Provisions and Federal Provisions for the Section 5310 Program are attached as exhibits to the Section 5310 grant agreement to ensure that the subrecipient is aware of all FTA requirements. SANDAG staff continuously provides oversight to verify that services delivered through the Section 5310 program continue to be eligible under that program. Additionally, for vehicle and other equipment projects, SANDAG continuously tracks usage and minimum useful life, and monitors to ensure the project property is used for the purpose for which it was originally acquired.

## Title VI Compliance

Included in the grant agreement for all grantees are provisions that require grantees to comply with Title VI requirements. Only subrecipients of federal funds are required to submit Title VI Programs and related documents. Subrecipients are required to submit the following documents to SANDAG prior to execution of a grant agreement:

- Title VI Program
- Title VI Program Resolution from Subrecipient's Governing Body
- Certificate of Non-Discrimination Assurances
- Equal Employment Opportunity Certificate

SANDAG reviews subrecipients' Title VI Programs to ensure compliance with FTA C 4702.1 B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients." Staff uses a checklist to validate that all required components are included in subrecipients' Title VI Programs. If federal requirements are not met through subrecipients' Title VI Programs, staff provides additional technical assistance to ensure compliance. SANDAG notifies each subrecipient that SANDAG has reviewed its Title VI Program and has verified that it meets federal requirements. Subrecipients' Title VI Programs and other related documents are stored and tracked electronically. SANDAG monitors scheduled updates to subrecipients' Title VI Programs (every three years) and submittal of other required forms and documents. SANDAG additionally tracks demographic data of clients served by the transportation programs of all grantees (subrecipients of federal funds and recipients of TransNet funds). Grantees are required to collect specialized transportation user demographic data throughout the grant term and submit data to SANDAG with invoice and progress report submissions. To this end, SANDAG has developed a specialized transportation demographic data survey that grantees may use to determine the populations that are served through their project(s) and the frequency with which these populations access services. Tracking of these data allows SANDAG to verify the equitable distribution of services through the STGP. Data received from grantees are included in the triennial Title VI report that SANDAG, as a direct recipient, submits to the FTA for SANDAG-related activities.



The success of the SANDAG oversight program is measured by the grantees' ability to implement its Title VI Program and other adopted procedures. At site visits or during desk reviews, SANDAG staff looks for or requests photographs of the posted Title VI Notice to the Public in the subrecipient's office, in vehicles, and on the subrecipient's website. SANDAG also checks that the Title VI Notice is made available in an accessible format. SANDAG also reviews materials that have been translated into other languages consistent with the subrecipient's Title VI Program. Finally, SANDAG tracks low income and minority participation in the projects through the specialized transportation user demographic data provided by grantees.

#### Americans with Disabilities Act of 1990 Compliance

The grant agreement also includes provisions that require grantees to comply with requirements under the ADA. Grantees are required to inform SANDAG of any complaints alleging discrimination on the basis of disability by the grantee or third-party contractor. [SANDAG Board Policy No. 009](#) outlines procedures for tracking and resolving complaints alleging discrimination of any kind. The SANDAG Discrimination Compliance Officer and Grants Division staff are responsible for tracking ADA complaints and working with grantees on a prompt and equitable resolution of ADA-related complaints. In addition to monitoring ADA compliance through site visits or desk reviews and the monitoring checklist, SANDAG prohibits grantees from using STGP vehicles that are deemed unsafe to operate. This prohibition extends to accessible equipment such as ramps and lifts, meaning accessible equipment must be operable and safe before a vehicle can transport individuals with disabilities through an STGP grant-funded project.

Additionally, SANDAG reviews grantee policies and procedures to verify ADA compliance pertaining to service animals, respirator or portable oxygen supplies, and accessible information. SANDAG may request response time or other data or information on grantee policies or procedures to confirm that an equivalent level of service is being provided. Further, SANDAG confirms that all grantees have ADA complaint procedures. SANDAG also confirms that grantees have a complaint form readily accessible to service beneficiaries so that those beneficiaries can submit a complaint on the grounds of ADA and/or Title VI. During desk reviews and/or site visits, SANDAG verifies that grantees have maintained a log of ADA or Title VI-related complaints, investigations, and lawsuits.

#### TAM Compliance

SANDAG continuously monitors the implementation of the SANDAG Group TAM Plan. Per 49 CFR 625.29, SANDAG works with participants and their Accountable Executives to amend the SANDAG Group TAM Plan between scheduled updates if there is a significant change to the asset inventory, condition assessment, or investment prioritization that could not be anticipated. SANDAG asks TAM applicability questions during the application process, and SANDAG requires applicable TAM vehicle data be submitted annually from grantees.

## 5.6 SANDAG Reporting

SANDAG complies with federal reporting requirements related to STGP-funded projects and communicates project performance to a variety of stakeholders including the FTA, TC, ITOC, SSTAC, grantees, and the public. SANDAG's reporting requirements and procedures related to the STGP are discussed in the following sections.

## Federal Reporting Requirements

The Federal Funding Accountability and Transparency Act of 2006 (FFATA) requires all direct recipients of FTA grants (who have been awarded over \$25,000 awarded on or after October 1, 2010) to report subaward information to the FFATA Subaward Reporting System (FSRS). Since SANDAG is subject to FFATA, SANDAG reports subrecipient information and award amounts in FSRS by the end of the month in which the Section 5310 grant agreements have been executed.

Since SANDAG purchases Section 5310-funded vehicles, SANDAG is required to report transit vehicle procurement awards pursuant to 49 C.F.R. 26.49(a)(4). Per these requirements, SANDAG submits, within 30 days of issuing a purchase order for a vehicle, the name of the vehicle manufacturer and total value of the purchase order. SANDAG uses the online Transit Vehicle Award Reporting Form provided by the federal government to report the required information on transit vehicle procurement awards.

As the designated recipient of Section 5310 funds, SANDAG submits quarterly federal financial and progress reports on the program of Section 5310 projects overseen by SANDAG.

## Grant Status Updates

SANDAG staff report on the status of individual STGP projects to the TC on a periodic basis and to the Social Services Transportation Advisory Council on an annual basis. Additionally, staff report on the status of TransNet Senior Mini-Grants (exclusively) to the ITOC on a semi-annual basis. A grant status update report highlights the performance of all active projects during the most recent reporting period for which SANDAG has grantee performance data. Table 5.2 lists the schedule for when staff present periodic grant status updates to the TC based on the invoice and progress report processing schedule discussed earlier.

Table 5.2

TC Grant Status Update Schedule

Quarter	Quarter Timeframe	Grantee Invoice and Progress Report Deadline	SANDAG Deadline to Process Invoices and Progress Reports	SANDAG Estimated Quarterly Grant Status Update Reporting Window*
1	July 1 – September 30	October 31	November 30	January
2	October 1 – December 31	January 31	February 28	April
3	January 1 – March 31	April 30	May 31	July
4	April 1 – June 30	July 31	August 31	October

*\* Grant status update publication or reporting deadlines are subject to change based on meeting agenda availability.*

The grant status update report indicates whether a project has been put on a watch list. The intent of the watch list is to alert the policy committees of projects that may require action should non-compliant performance continue. A project is placed on the watch list if the project is not currently or is not anticipated to be able to provide the deliverables included in their scope of work or is not in compliance with grant agreement terms.

SANDAG also provides annual updates on the STGP to the SSTAC. These updates provide an overview of the STGP and summarize program performance from successful project implementation.

# Chapter 6:

## Project Closeout

The last phase of the grants management lifecycle is project closeout. SANDAG and grantees engage in the project closeout process once all applicable administrative actions and required work related to the grant award are completed. For all STGP projects, SANDAG and grantees have responsibilities to ensure successful and smooth project closeout. For Section 5310 projects, SANDAG has additional responsibilities to close out its grant award with the FTA. The following sections describe project closeout activities by subject area and delineate responsibilities between SANDAG and grantees.

### 6.1 Financial Closeout

Grantees may only incur valid grant costs during the grant term. Grantees are not reimbursed for any costs incurred after the end of the grant term. As stated earlier, invoices for a reporting quarter are due one month after the end of the reporting quarter. The exception to this requirement is a grantee's final invoice. If a grant termination date occurs between the beginning of a reporting quarter and 60 days after the beginning of a reporting quarter, grantees have 60 days to submit a final invoice. If a grant termination date occurs between 60 days after the beginning of a reporting quarter and the end of a reporting quarter, grantees have until one month after the end of the reporting quarter to submit a final invoice. Grantees must also make final allowable payments to any third-party contractors and submit a grant closeout report concurrent with the final invoice submission. Any unexpended grant funds invoiced 90 days after the grant termination date are forfeited and are no longer accessible to a grantee for reimbursement.

As the designated recipient of Section 5310 funds, SANDAG is required to liquidate all financial obligations incurred under its Section 5310 award no later than 120 calendar days after the end of the period of performance. Thus, SANDAG must closeout grants with subrecipients before SANDAG can close out its award with the FTA. Unexpended Senior Mini-Grant funds are liquidated and reinvested into the Senior Mini-Grant program through a subsequent call for projects. Unexpended Section 5310 funds are liquidated and are either returned to the FTA or reinvested into the Section 5310 program through a subsequent call for projects. Reinvested Section 5310 program funds must be allocated to the same project type for which the funds were originally allocated. For example, liquidated Section 5310 funds from a vehicle procurement project must be used to fund a future Section 5310 vehicle procurement project. For Section 5310 projects, SANDAG is also responsible for submitting a final Federal Financial Report during closeout after the period of performance of SANDAG's award with the FTA has ended.

## 6.2 Grantee Closeout Report

Grantees are required to complete a grantee [closeout report](#). In a grantee closeout report, grantees are required to discuss not only if grant-funded outputs and deliverables were met, but also if they allowed the grantee to achieve the goals proposed in the grant and advance the STGP program goal and objectives. Consistent with the GPRA Modernization Act of 2010, an output measure refers to the tabulation, calculation, or recording of activity or effort and can be expressed in quantitative or qualitative manner. An outcome measure refers to an assessment of the results of a program activity compared to the intended purpose. In a grantee closeout report, grantees must relate financial data, outputs, and deliverables to the outcomes or performance accomplishments of the grant-funded grantee in their grantee closeout report so that the grantee can demonstrate progress toward the goals, objectives, and outcomes for which the grant funding was provided. To this end, the completed grantee closeout report should also detail program performance successes and challenges to help SANDAG improve program outcomes, share lessons learned, and adopt the most promising practices. For Section 5310 projects, SANDAG synthesizes data in subrecipient grantee closeout reports to inform the grant closeout report it submits to the FTA.

## 6.3 SANDAG Grant Closeout Report

SANDAG staff complete a Grant Closeout Checklist to summarize grantee performance data, analyze success of grant efforts, and report to relevant committees.

## 6.4 Record Retention

As mentioned earlier, grantees are also required to maintain all accounting records and other supporting papers for a minimum of three years after grant closeout. Grantees must make these records available to auditors, including SANDAG's independent performance auditor, to verify compliance with the terms specified in the grant agreement. Grantees are responsible for ensuring that all third-party contractors comply with the record retention requirement. Grantees must safeguard personally identifiable information and must not, as stated earlier, report personally identifiable information to SANDAG.

Specifically, all books, documents, papers, accounting records, and other evidence pertaining to the performance of grant-funded projects (including, but not limited to, the costs of administering those projects) must be made available for inspection for the purpose of determining compliance with Title 21, California Code of Regulations, Section 2500 et seq., when applicable, and other matters connected with the performance of grantees and subgrantees pursuant to Government Code Section 8546.7. Grantees and third-party contractors are required to make the materials listed above available at their respective offices at all reasonable times during the entire grant project period and for three years from the date of the SANDAG final payment to the grantee under the grant agreement. Grantees and third-party contractors are additionally required to allow the State Fair Employment Practices and Housing Commission (or any other agency of the State of California designated by SANDAG to perform compliance investigations) to access all records of employment, employment advertisements, employment application forms, and other pertinent data and records.

## 6.5 Project Property Disposition

Grantees are required to operate project property for its minimum useful life as specified in the grant agreement. The following sections describe SANDAG's procedures for disposing of project property after

it has met the end of its minimum useful life. Procedures for project property that is required to be disposed of before it has reached the end of its minimum useful life are also discussed.

#### Disposition Procedures for Project Property that Has Met the End of its Minimum Useful Life

Once project property has reached the end of its minimum useful life, the grantee must notify SANDAG. SANDAG may transfer the project property from SANDAG to the grantee that operated it during the grant term if certain conditions are met. If those conditions are not met, the grantee is encouraged to continue using the project property past its minimum useful life under the terms of the SANDAG Grant Agreement, and if applicable, the SANDAG Vehicle Lease Agreement. If the project property cannot be transferred to the grantee or continued to be used past its minimum useful life, it may be returned to SANDAG in acceptable condition for disposal.

#### **SANDAG Transfer of Project Property to Grantee**

Per FTA Circular 5010.1E, the FTA retains a financial interest in federally funded project property with a unit value exceeding \$5,000 at the time of disposition. Moreover, FTA Circular 5010.1E states that after the minimum useful life of federally funded assets is reached, vehicles and other equipment “with a unit market value of \$5,000 or less or supplies with a total aggregate market value of \$5,000 or less, may be retained, sold, or otherwise disposed of with no obligation to reimburse FTA.”

SANDAG may transfer project property to grantees if all the following conditions are met:

1. The project property has reached the end of its minimum useful life,
2. The value of federally funded project property is \$5,000 or less,
3. The grantee is government or nonprofit entity,
4. The project property would be used for valid public purposes, and
5. There are no other extenuating circumstances, procedures, policies, or laws prohibiting SANDAG from transferring project property to a grantee.

For this disposition method, at their own cost grantees must first attempt to determine the project property’s fair market value through an independent appraisal, or another method approved by SANDAG. Grantees that have obtained the project property’s fair market value must submit it to SANDAG and, if an independent appraisal was performed, documentation to verify that the appraisal was completed independently of the grantee. If the fair market value cannot be established, the value of the project property can be calculated through the straight-line depreciation method consistent with federal regulations.

Grantees with transferred project property must ensure that it is used solely for public purposes. As such, the transfer will be completed by assignment including a condition of continued use for public purposes via a self-certification form. Consistent with the program objectives, a grantee must continue to use the assigned project property for public purposes.

If SANDAG approves the project property transfer from SANDAG to the grantee, this approval is considered an authorized SANDAG disposition action. If the project property is the only asset covered by the SANDAG grant agreement and, if applicable, the vehicle lease agreement, SANDAG will initiate project closeout to terminate the agreement(s) and send a disposition letter to the grantee defining the grantee’s continued responsibilities relative to the project property. If the grant agreement and, if applicable, the vehicle lease agreement cover other assets that the grantee will continue to use, SANDAG will prepare and present an amendment to the relevant agreement(s) to formalize the disposition of the project property that will be transferred via assignment. This assignment will occur by the deadline expressed in the amendment.

For vehicles, this disposition process includes, but is not limited to collecting necessary authorized signatures to release the vehicle title and completing any forms required by the Department of Motor Vehicles (DMV). The grantee shall be responsible for paying any costs associated with the transfer including DMV fees incurred by SANDAG to complete transfer and disposition of the vehicle(s). The authorized SANDAG disposition action will be deemed complete when all applicable fees are paid; the grantee has signed and returned the disposition letter or the amendment to the relevant agreement(s) has been executed; and SANDAG and the grantee sign the vehicle title, releasing it to the grantee and removing SANDAG as the lienholder.

The grantee is responsible for using project property only for public purposes and maintaining records of the final disposition action taken by the grantee including disposal by auction, sale, destruction, and trash. The grantee is required to notify SANDAG if it uses project property for non-public purposes but is not required to notify SANDAG of the final disposition action taken.

### **Grantee Continued Use of Project Property**

If the project property cannot be transferred from SANDAG to the grantee once it has reached the end of its useful life, the grantee may continue to use the project property past its minimum useful life under the terms of the SANDAG grant agreement, and if applicable, the SANDAG vehicle lease agreement. If after continued use the conditions are met for SANDAG to transfer the project property to the grantee, then SANDAG will work with the grantee to dispose of the project property via assignment.

### **Grantee Return of Project Property to SANDAG**

If the project property cannot be transferred from SANDAG to the grantee, the grantee may request to return it to SANDAG. Returned project property must be in acceptable working condition. SANDAG will dispose of project property using a method that is in the best interests of SANDAG and the STGP, and consistent with [SANDAG Board Policy No. 028](#), and if applicable, federal guidance. Such methods include, but are not limited to, transfer to another grantee, competitive auction, and competitive sale. The method SANDAG selects will depend on factors such as the project property's value, demand for the project property by other grantees or entities, the value of the federal share when applicable, and timing of the disposition. For example, SANDAG may find it advantageous to combine dispositions if there are multiple, similar dispositions that will occur around the same time. Additionally, per FTA Circular 5010.1E, FTA prior approval is required for sales of federally funded vehicles and other equipment with a fair market value exceeding \$5,000 at the end of their minimum useful life. For these reasons, grantees should expect that the disposition process will be completed within approximately six months of the grantee request to return the project property to SANDAG.

#### **Grantee Preparation to Return Project Property to SANDAG**

Before grantees may return vehicles and other equipment to SANDAG, grantees must ensure the following:

1. Vehicles and other equipment are in good working order.
2. All parts and accessories as originally received by the grantee can be provided.
3. Maintenance records are accurate and can be provided.
4. Instruction manuals or other available documents originally received by the grantee can be provided.

For vehicles, grantees must also ensure vehicle registrations and insurance coverage are valid and/or maintained for at least six months after the request to return vehicles is submitted to SANDAG up until the project property is physically accepted by SANDAG.



### **Sale of Federally Funded Vehicles and Other Equipment Whose Fair Market Value Exceeds \$5,000**

FTA Circular 5010.1E states that the FTA is entitled to its share of the remaining federal interest upon disposition of federally funded property before the end of its minimum useful life or for a value greater than \$5,000 after the useful life has been met. For federally funded vehicles and other equipment that are sold for more than \$5,000, SANDAG will retain \$5,000 and the non-Federal share of the remaining proceeds. Per Section 5334(h)(4) of Title 49, the remaining federal interest owed to the FTA is the sales proceeds minus the amount SANDAG can retain. For example, as shown in Table 2, if the proceeds from the sale of a federally funded vehicle were \$10,000 and the federal share of the original vehicle purchase was 80%, SANDAG would return \$4,000 to the FTA (80% of the proceeds exceeding \$5,000). The remaining non-Federal share would be \$6,000 to SANDAG. After the FTA is reimbursed, remaining sale proceeds are provided to SANDAG to reinvest in the STGP for future capital asset purchases.

Table 6.1

Example of Determining Amount Due to FTA from Sale Proceeds of Federally Funded Vehicles and Other Equipment Whose Fair Market Value Exceeds \$5,000 at the End of Their Minimum Useful Life

Calculation	Amount
Sale Proceeds	\$10,000
Federal Share Percentage	80%
Sales Proceeds Above \$5,000 (\$10,000 minus \$5,000)	\$5,000
Federal Share (\$5,000 multiplied by 80%)	\$4,000
Remaining Amount Provided to SANDAG (\$10,000 minus \$4,000)	\$6,000

### **Sale of Federally Funded Vehicles and Other Equipment Whose Fair Market Value is \$5,000 or Less**

Per FTA Circular 5010.1E, after the useful life of federally funded project property is reached, vehicles and other equipment with a unit market value of \$5,000 or less may be retained, sold, or otherwise disposed of with no obligation to reimburse the FTA. Any proceeds resulting from the sale of these assets are reinvested in the STGP for future capital asset purchases.

### **Sale of Non-federally Funded Vehicles and Other Equipment**

Consistent with SANDAG Board Policy No. 028, SANDAG may also sell non-federally funded vehicles and other equipment at the end of their minimum useful life. Any proceeds resulting from the sale of these assets are reinvested in the STGP for future capital purchases.

### **SANDAG-Approved Return of Project Property**

If SANDAG approves a grantee request to return project property, this approval is considered an authorized SANDAG disposition action. If the project property is the only asset covered by the SANDAG grant agreement and, if applicable, the vehicle lease agreement, SANDAG will initiate project closeout to terminate the agreement(s). If the grant agreement and, if applicable, the vehicle lease agreement cover other assets that the grantee will continue to use, SANDAG will prepare and present an amendment to the grant agreement to formalize the disposition of the grant property that will be returned to SANDAG.

SANDAG, the grantee and, if applicable, the FTA shall work together to complete the disposition process. For STGP-funded vehicles, this includes but is not limited to collecting necessary authorized

signatures to remove the grantee as the registered owner on the vehicle title, completing any forms required by the California DMV, setting the transfer date, and coordinating with a third-party auctioneer or other buyer when applicable. The grantee shall be responsible for paying any costs incurred by SANDAG to complete transfer and disposition of project property. The disposition of STGP-funded project property will be deemed complete when all applicable fees are paid, all transfer documentation is complete, and the property is physically moved from the grantee's storage location to that of the new owner or SANDAG. Upon completion of the disposition process, grantees have no financial interest in the disposed project property including any matching funds previously provided. SANDAG retains documentation of the final disposition actions taken, making records available to the FTA upon request.

### Early Disposition Procedures

Grantees are required to continually use awarded project property through the end of its minimum useful life for purposes of the original award. There are a few circumstances when project property becomes a candidate for Early Disposition, defined as the disposition of vehicles and other equipment before the end of their minimum useful life has been reached. The few circumstances are listed below and described in the following sections:

1. The project property has been mismanaged due to a failure in grantee performance
2. The project property was lost or damaged due to a fire, casualty, accident, or natural disaster.

### Early Disposition Due to A Failure in Grantee Performance

If a grantee has abused, misused, unreasonably delayed, failed to use, or otherwise lacks the capacity to use project property, these events may constitute a breach or failure of performance by the grantee under the terms of its grant agreement.

Abuse is defined as the willful damage or the failure to reasonably prevent the willful damage of project property. Misuse or inappropriate use refers to a grantee's use of project property for purposes other than the grant award without approval by SANDAG. Per FTA Circular 5010.1E, if SANDAG finds that federally funded project property has never been used for appropriate purposes, SANDAG is required to receive FTA approval before SANDAG can sell the property and pay the FTA the greater of FTA's share of the fair market value or the entire amount of federal assistance spent on that federally funded property.

If SANDAG makes this determination, the grantee must forfeit the project property to SANDAG and work with SANDAG to facilitate the early disposition process. If the project property is the only asset covered by the SANDAG grant agreement and, if applicable, the vehicle lease agreement, SANDAG will initiate project closeout to terminate the agreement(s). If the grant agreement and, if applicable, the vehicle lease agreement cover other assets that the grantee will continue to use, SANDAG will present an amendment to the grant agreement to formalize the disposition of the project property that the grantee will forfeit to SANDAG.

For STGP-funded vehicles, this includes but is not limited to collecting necessary authorized signatures to remove the grantee as the registered owner on the vehicle title, completing any forms required by the California DMV, setting the transfer date, and coordinating with a third-party auctioneer or other buyer when applicable. The grantee will be responsible for driving the vehicle(s) to a location designated by SANDAG and for the expenses of storing and maintaining insurance for the vehicle(s) until the date of return agreed upon with SANDAG. The grantee shall also be responsible for paying any costs incurred by SANDAG to complete transfer and disposition of vehicle(s) or other equipment. The disposition of STGP-funded vehicles will be deemed complete when all applicable fees are paid, the title is signed by all parties removing the grantee as registered owner, and the property is physically moved from the grantee's storage location to that of the new owner or SANDAG. Upon completion of the disposition

process, grantees have no financial interest in the disposed vehicles or other equipment including any matching funds previously provided. SANDAG retains documentation of final disposition actions taken, making records available to the FTA upon request and when applicable.

If project property is forfeited to SANDAG due to a failure in grantee performance not caused by a force majeure event, the grantee will receive a low performance score from SANDAG, which will likely affect the grantee's ability to successfully request capital projects through a subsequent STGP call for projects.

### **Early Disposition Due to Calamity**

Grantees are required to continuously operate project property until at least the end of its minimum useful life unless the project property qualifies for early disposition. The following sections detail early disposition procedures if project property is substantially damaged or destroyed due to fire, casualty, accident, natural disaster, or other calamity that requires early disposition.

#### **Grantee Reporting for Project Property**

If project property is substantially damaged or destroyed, the grantee shall notify SANDAG immediately, and in no event later than 72 hours after the incident. The grantee will include the date and time of the incident; when the vehicle or other equipment was taken out of service; the details of the incident, including a description of what occurred; photographs of the incident and property damage; and any other relevant documentation related to the incident such as the driver's accident report. Within 10 days of an accident involving a STGP-funded vehicle, the grantee shall complete and submit a traffic accident report to the California DMV, and forward the report to SANDAG, if the accident involved an injury, death, or property damage in excess of \$1,000. Within 30 days of the incident, the grantee shall also submit to SANDAG a copy of a claims report if the grantee initiates a claim with its insurance provider. The grantee should forward any copies of documents furnished by the grantee's insurer upon receipt including, but not limited to, a property damage appraisal, proof of loss determination as applicable, and a cash value determination of the settlement amount.

#### **Federally Funded Project Property**

##### *Determining the Remaining Federal Interest*

After the calamity incident, the remaining federal interest must be attained to determine what, if any, amount is owed to the FTA. FTA Circular 5010.1E states that the federal interest is determined "by calculating the fair market value of the federally assisted property immediately before the occurrence prompting the withdrawal of that property from appropriate use (e.g., sale, loss, etc.)." Consistent with FTA Circular 5010.1E, SANDAG shall determine the fair market value of the federally funded project property based on straight-line depreciation of the original purchase price. For federally funded vehicles, the fair market value obtained through the straight-line depreciation methodology can be based on either the accumulation of miles or years, whichever is more advantageous to SANDAG. The remaining federal interest is then calculated by multiplying the fair market value at time of disposition by the percentage of FTA's participation in the original award.

As shown in Table 6.2, the following is an example scenario for demonstrating how the remaining federal interest is calculated:

A Class D minivan was purchased for \$50,000, using \$40,000 in federal funds and \$10,000 in matching funds. The minimum useful life of a Class D minivan is four years or 100,000 miles, whichever occurs first. The minivan was involved in an accident, deemed a total loss, and required early disposition. At the time of the accident, the vehicle had been in-service for one year and had accumulated 50,000 miles.

Table 6.2

Example for Determining the Remaining Federal Interest After Federally Funded Property is Involved in a Fire, Accident, Casualty, Natural Disaster, or Other Calamity

Example Calculation	Calculations Based on Number of Years	Calculations Based on Mileage
Original Purchase Price	\$50,000.00	\$50,000.00
Federal Contribution to Original Purchase	\$40,000.00	\$40,000.00
Federal Share of Original Purchase	80%	80%
Minimum Useful Life (Years or Miles)	4	100,000
Minimum Useful Life Expended Immediately Prior to Accident	1	50,000
Percentage of Minimum Useful Life Expended	25%	50%
Accumulated Depreciation based on Straight Line Method	\$12,500.00	\$25,000.00
Remaining Value	\$37,500.00	\$25,000.00
Remaining Federal Interest (80% of Original Purchase Price)	\$30,000.00	\$20,000.00
Remaining Non-Federal Interest (20% of Original Purchase Price)	\$7,500.00	\$5,000.00

#### *Early Disposition Actions and Insurance Proceeds*

After SANDAG determines the remaining federal interest of the project property considered for early disposition, grantees can either: (1) work with SANDAG to reimburse the FTA for the remaining federal interest using insurance proceeds and matching funds when applicable; or (2) in lieu of returning the federal share to the FTA, transfer the remaining federal interest to a replacement vehicle or other equipment of like kind. The value of the remaining federal interest does not depend on the extent of insurance coverage or on the amount of any insurance proceeds received and upon disposition, the grantee has no remaining financial interest in project property including any match previously provided. Therefore, if a grantee decides not to apply the insurance proceeds to a replacement vehicle or equipment, the grantee must return to SANDAG any surplus insurance proceeds after the FTA has been reimbursed. If a grantee chooses to reinvest the insurance proceeds into the purchase of a replacement vehicle or equipment, the grantee must pay SANDAG any difference between the insurance proceeds and the cost of the replacement project property.

Once SANDAG notifies the grantee of the remaining federal interest, the grantee must request in a timely manner to either apply any insurance proceeds to procuring replacement project property or return the remaining federal interest to the FTA. SANDAG shall consider the grantee's request when seeking the required FTA approval of the early disposition action in accordance with FTA Circular 5010.1E.

As shown in Table 6.3, the following example is considered: A Class D minivan was purchased for \$50,000, using \$40,000 in federal funds and \$10,000 in matching funds. The minimum useful life of a Class D minivan is four years or 100,000 miles, whichever occurs first. The minivan was involved in an accident, deemed a total loss, and required early disposition. At the time of the accident, the vehicle had been in-service for one year and had accumulated 50,000 miles. SANDAG determined it was most advantageous to base the remaining federal interest on the vehicle's remaining minimum useful life measured in miles. The remaining value based on the straight-line depreciation method was determined to be \$25,000. Of that, the remaining federal interest was determined to be \$20,000.

- Scenario A: A grantee receives \$25,000 in insurance proceeds and requests to apply these proceeds to reimburse the FTA for the remaining federal interest. Pending FTA and SANDAG approval, SANDAG will work with the grantee to dispose of the vehicle, reimbursing the FTA for the remaining federal interest, or \$20,000 or reinvesting the funds back into the program. The surplus insurance proceeds, or \$5,000, are returned to SANDAG.
- Scenario B: A grantee receives \$15,000 in insurance proceeds and requests to apply these proceeds to reimburse the FTA for the remaining federal interest. Pending FTA and SANDAG approval of this disposition action, the grantee would be required to apply the total amount of the insurance proceeds to reimburse the FTA for the remaining federal interest. Additionally, the grantee would be required to pay SANDAG the difference between the insurance proceeds received and the amount of the remaining federal interest, or \$5,000 in matching funds, so SANDAG has all funds needed to reimburse the FTA.
- Scenario C: A grantee receives \$30,000 in insurance proceeds and requests to apply these proceeds toward the acquisition of a new Class D minivan. The cost of the replacement minivan is \$50,000. Pending FTA and SANDAG approval of this disposition action, the grantee would be required to pay SANDAG \$20,000 in matching funds, or the difference between the insurance proceeds and the cost of the replacement minivan. The remaining federal interest would be transferred to the replacement vehicle and no reimbursement to the FTA is required.

Table 6.3

Examples of Early Disposition of Federally Funded Vehicles and Insurance Proceeds

Example Calculations	Scenario A	Scenario B	Scenario C
Remaining Federal Interest	\$20,000.00	\$20,000.00	\$20,000.00
Amount of Insurance Proceeds Received	\$25,000.00	\$15,000.00	\$30,000.00
Amount Due to FTA	\$20,000.00	\$20,000.00	\$0.00
Surplus Insurance Proceeds Due to SANDAG to Reinvest in Future Call for Projects	\$5,000.00	\$0.00	\$0.00
Matching Funds Due to SANDAG to Reimburse the FTA for the Remaining Federal Interest	\$0.00	\$5,000.00	\$0.00
Matching Funds Due to SANDAG for Replacement Vehicle	\$0.00	\$0.00	\$20,000.00

### **Early Disposition Actions and Insurance Proceeds for Non-Federally Funded Project Property**

After non-federally funded project property is involved in a fire, accident, casualty, natural disaster, or other calamity that requires early disposition, grantees shall work with SANDAG to dispose of damaged or destroyed property consistent with SANDAG Board Policy No. 028. With SANDAG approval, grantees can either apply any disposition and insurance proceeds toward the cost of a replacement vehicle or other equipment or return any insurance proceeds to SANDAG for use in a future call for projects. Upon disposition, grantees have no remaining financial interest in including any match previously provided. Grantees requesting replacement project property of like-kind must provide additional matching funds to SANDAG in the amount of the difference between the insurance proceeds received and the cost of the replacement project property.

### **Purchase of Like-Kind Project Property**

If a grantee receives an insurance settlement for the project property damaged or destroyed due to an accident, natural disaster, or other calamity, the grantee can return the insurance settlement to SANDAG or apply the amount toward a replacement of like-kind, providing matching funds to SANDAG in the amount of the difference between the insurance proceeds and the cost of the replacement project property. SANDAG requires STGP-funded replacement vehicles to be new and purchased through the CALACT/BT Vehicle Purchasing Cooperative. SANDAG shall verify the required specifications with the grantee, conduct an independent cost estimate, solicit quotes, and confirm the total cost of the like-kind replacement and the grantee's required portion of the total cost.

Next, SANDAG and the grantee shall execute an amendment to the SANDAG grant agreement covering the project property to document the addition of like-kind replacement and obligate the grantee to pay SANDAG the required match amount. The termination dates of the grant agreement and vehicle lease agreement may need to be extended to account for the minimum useful life of the like-kind replacement. The project budget may also be adjusted.

Once an amendment has been executed, SANDAG will invoice the grantee for any required matching funds. Once all funds are received, SANDAG will purchase the chosen like-kind replacement. SANDAG and the grantee shall work together to complete any post-delivery requirements. Once all post-delivery requirements are met, the grantee must put the replacement project property into service in a timely fashion. Once the replacement project property has been put in service, the grantee is required to continuously use it and provide quarterly reports to SANDAG for its remaining useful life as identified in the amendment to the SANDAG grant agreement.



# Chapter 7:

## Glossary of Terms

The following glossary defines key terms used in the Specialized Transportation Program Management Plan.

### A

#### Accessible Vehicle

a vehicle that has the capacity to accommodate a passenger who uses a personal mobility device inside the vehicle, and meets the requirements for lifts, ramps, and securement systems specified in 49 C.F.R. part 38, subpart B

#### Accountable Executive

a single, identifiable person who has ultimate responsibility for carrying out the safety management system of a public transportation agency; responsibility for carrying out transit asset management practices; and control or direction over the human and capital resources needed to develop and maintain both the agency's public transportation agency safety plan, in accordance with 49 U.S.C. 5329 (d), and the agency's transit asset management plan in accordance with 49 U.S.C. 5326

#### Alternative Services

the transportation service of delivering of meals, prescriptions, technological devices, and/or personal protective equipment to the target population

#### Americans with Disabilities Act (ADA)

a law that prohibits discrimination against and ensures equal opportunity for persons with disabilities in employment, state and local government services, public accommodations, commercial facilities, and transportation (42 U.S.C. § 12101 et seq.)

#### Applicant

an organization that is considering or has submitted an application in response to a call for projects

#### Assignment

a valid disposition method for project property that has reached the end of its minimum useful life, is valued at \$5,000 or less if originally funded through a federal award, was originally awarded to a government or nonprofit entity, and will continue to be used for valid public purposes. If these conditions are met, SANDAG will assign project property to the grantee that operated it during its useful life

### C

#### Call for Projects

the process to allocate grant funding. It includes the submission of applications, the evaluation of submitted applications based on evaluation criteria set by the Board of Directors, and the prioritization of grants to receive funding.

### Capital Asset

a unit of rolling stock (e.g., vehicles), land, a facility, a unit of equipment, an element of infrastructure, or intellectual property (including software), with a useful life of more than one year that are capitalized in accordance with Generally Accepted Accounting Principles. Capital assets also include any addition, improvement, modification, replacement, rearrangement, reinstallation, renovation, or alterations that materially increase the value of the asset (apart from ordinary repairs and maintenance.)

### Capital Expense

an incurred expense associated with the performance of a capital project. Vehicle expenses associated with operating and maintaining a transportation service such as fuel, insurance, and routine and preventative maintenance are ineligible capital expenses

### Capital Project

an eligible Section 5310 project type consisting of the acquisition of contracted transportation services or the purchase of real or personal property such as vehicles, computers and software, maintenance equipment, and communication systems

### Cardinal Change

a change made that is not within the scope of the original contract and within the scope of the original competition. More information is available on the [FTA Website](#).

### Client-based Transportation

transportation in which riders must be clients or members of a transportation provider's program

### Coordinated Public Transit-Human Services Transportation Plan (Coordinated Plan)

a federally mandated document developed by SANDAG that identifies 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 Coordinated Plan is available at [SANDAG.org/CoordinatedPlan](https://www.sandag.org/CoordinatedPlan).

### Corrective Action Plan

a document prepared by a grantee and submitted to SANDAG that includes a detailed description and viable action steps to quickly remediate compliance deficiencies identified by SANDAG

### Cost per One-Way Passenger Trip (Cost per Trip)

the sum of grant funds and required minimum matching funds divided by the total number of one-way passenger trips

### Cost per Unit of Service

the sum of grant funds and required minimum matching funds divided by the total number of units of service

## D

### Demand Responsive Service

any non-fixed route system of transporting individuals that requires advanced scheduling including services provided by public entities, nonprofit organizations, and private providers

### Depreciation

the method used to calculate the reduction in value of an item of personal or real property over time. It is also a method to calculate the value that is used when disposing of an asset before the end of its useful life when fair market value cannot be established.

### Designated Recipient

an entity that has been designated by a state governor to receive federal funding and redistribute (sub-allocate) the funding. SANDAG is the designated recipient of Federal Transit Administration Section 5310 funds for the large, urbanized area of San Diego County.

### Desk Review

a focused examination of a grantee's documentation to produce an evaluation of the grantee's broad capacity to manage its grant award and comply with the provisions of the grant agreement

### Direct Cost

an expense that can be directly assigned to a grant relatively easily with a with a high degree of accuracy

### Direct Recipient

an entity that receives funding directly from the Federal Transit Administration (FTA). SANDAG is a direct recipient of the FTA.

### Disparate Impact

a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin

### Disparate Treatment

actions that result in circumstances where similarly situated persons are intentionally treated differently (i.e., less favorably) than others because of their race, color, or national origin

### Disposition

the settlement of the federal or other interest in project property that is no longer needed for the originally authorized purpose

### Disproportionate Burden

a neutral policy or practice that disproportionately affects low-income populations

## E

### Early Disposition

the disposal of project property before it has reached its useful life

### Equipment

an article of nonexpendable, tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost that equals or exceeds the lesser of the capitalization level established by SANDAG or a grantee for financial statement purposes, or \$5,000. Equipment includes rolling stock (e.g., vehicles), computing devices, information technology systems, and all other such property used in the provision of public transit service.

### Evaluation Criteria

the quantitative and qualitative criteria used to score applications submitted in response to a SANDAG call for projects

## F

### Fair Market Value

the most probable price that project property would bring in a competitive and open market.

### Fixed-Route Public Transit

a transportation service that uses buses, vans, light rail, and other vehicles to operate on a predetermined route according to a predetermined schedule

## G

### Grant

A sum of money that a government, agency, institution, or foundation awards to an organization or individuals for a particular purpose

### Grant Term

the period in which a grant agreement is in effect, starting at the effective date of the grant agreement and ending at the termination date as specified in the grant agreement, or, if applicable, an amendment to the grant agreement

### Grantee

an organization that has been awarded funding through the Specialized Transportation Grant Program and has entered into a grant agreement with SANDAG

## I

### In Service

the time in which a grantee uses an STGP-funded vehicle or service to provide specialized transportation to the target population

### Incidental Users

persons who are not within the target population. Personal care attendants are considered neither incidental users nor members of the target population, however, people who solely accompanying older adults or disabled passengers (not for care purposes) are incidental service users

### Indirect Cost

an expense incurred for a common or joint purpose benefitting more than one cost objective that cannot be readily assigned to a specific grant, contract, or other activity, without effort disproportionate to the results achieved

### Indirect Cost Rate

the ratio between total indirect costs and some direct cost base

### Individual with a Disability

an individual who has a physical or mental impairment that substantially limits one or more of their major life activities

### In-Kind Contributions

a contribution of time, or resources by an individual (e.g., volunteer) or entity that can be used as matching funds for projects other than vehicle and other equipment procurements. Examples may include the time of a volunteer driver or the value of donated goods and services.

## L

### Limited English Proficient (LEP) Individuals

persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. People with LEP include those who report to the U.S. Census that they speak English less than very well, not well, or not at all.

### Low-income Person

refers to an individual whose family income is at or below 200% of the poverty line as defined by the Office of Management and Budget based on the most recent data available from the U.S. Census Bureau for a household of the size being evaluated

### Low-income Population

any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed SANDAG-funded program, policy, or activity

## M

### Match Percentage

is calculated by dividing the total match amount by the sum of the matching funds and the grant award.

### Matching Funds

refers to the amount of funding other than the grant award that goes toward the net project cost.

### Metropolitan Planning Organization (MPO)

a federally mandated and federally funded transportation policy-making organization in the United States that is made up of representatives from local government and governmental transportation authorities. SANDAG is the MPO for the San Diego region

### Minimum Match Percentage

the minimum portion of the net project cost not paid with grant funds as required by the STGP

### Minimum Matching Funds

the minimum amount of funds a subrecipient contributes to adhere to the required minimum match percentage in accordance with the STGP

### Minimum Useful Life

the expected lifetime of project property, such as a vehicle, or the acceptable period of use in service. Project property purchased with grant funds may frequently be used beyond its minimum useful lives. The minimum useful life of a vehicle varies based on the type of vehicle. As specified in FTA Circular 5010.1E, as amended, the minimum useful life of medium-sized, light-duty buses such as Class A, B, and C vehicles is 150,000 miles or 5 years, whichever occurs first. The minimum useful life of light-duty vans such as Class D and V vehicles is 100,000 miles or 4 years, whichever occurs first. The minimum useful life in years is calculated based on the date the project property is placed in service and continues until it is removed from service. The calculation for minimum useful life in years for rolling stock only includes the time a vehicle is in-service; the time a vehicle is taken out of service for maintenance, repairs, or other reasons is excluded.

### Minority

is a term in Title VI and other federal guidance and is used when speaking of data from the U.S. Census. It means people who are:

1. American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment
2. Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam
3. Black or African American, which refers to people having origins in any of the Black racial groups of Africa



4. Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race
5. Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands

#### Minority Population

any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations (such as migrant workers or Native Americans) who will be similarly affected by a proposed SANDAG-funded program, policy, or activity

#### Mobility Management Expense

an incurred expense associated with the performance of a mobility management project. Mobility management expenses may include costs such as staff wages, software to track referrals and travel training performance, and outreach materials.

#### Mobility Management Project

an eligible project type consisting of short-range planning and management activities that improve coordination among public transportation and other transportation service providers to enhance or expand specialized transportation services. Mobility management does not include operating specialized transportation services. Mobility management projects include, but are not limited to, travel training, information and referral services, and outreach to the target population that improves coordination.

#### Monitoring Checklist

a checklist that evaluates the performance of each active grantee in implementing one or more projects and complying with the requirements of the grant agreement

## N

#### National Origin

the nation in which a person was born, or where the person's parents or ancestors were born

#### Net Project Cost

the total project cost less any revenue generated through the project

#### Non-scalable Project

a project whose scope of work cannot be reduced because doing so (a) is not possible, (b) would create an incomplete project that contributes little to the grant program goals or provides little value to those intended to benefit from the project, and/or (c) would have scored substantially differently in the funding allocation process with a reduced scope of work

#### Nontraditional Section 5310 Projects

eligible Section 5310 projects other than traditional projects. Nontraditional Section 5310 projects include operating projects such as volunteer driver programs

## Notice to Proceed

a written authorization SANDAG issues to a grantee after a grant agreement has been executed to allow for a project to begin. The Notice to Proceed includes the date the grantee can incur expenses that may be eligible for reimbursement.

## O

### Older Adult (Senior)

refers to an individual who is 65 years of age or older through the Section 5310 program or 60 years of age or older through the Senior Mini-Grant program

### One-Way Passenger Trip (OWPT)

a one-way trip from origin to destination made by one rider. A round trip with one rider is considered two one-way passenger trips. See Section 4.2.

### Operating Expense

an expense associated with the performance of an operating project. Operating expenses may include costs such as driver's salaries, mileage reimbursement, office supplies, and wages of staff who schedule and track trips for the target population.

### Operating Project

an eligible project type consisting of activities and expenses to operate, maintain, and manage a transportation service for the target population.

### Out of Service

the time in which an STGP-funded vehicle or service is not providing specialized transportation to the target population. It includes miles driven for deadheading, vehicle maintenance, vehicle testing, and driver training without transporting the target population.

## P

### Paratransit

a demand-responsive transportation service provided by transit operators within a three-quarters mile of fixed-route public transit per the ADA designed for individuals with disabilities who are unable to use fixed-route public transit.

### People of Color

a term used in the Regional Plan to refer to "minority" as defined by the U.S. Census and as written in many federal Title VI requirements

### Performance Indicators

measuring relevant outputs, service levels, and outcomes SANDAG grant programs

### Performance Measures

measurements used to monitor and report on STGP project performance

#### Period of Performance

the total time interval between the start of an awarded project that has received a Notice to Proceed, and the grant's planned end date as specified in the Grant Agreement or, if applicable, an amendment to the Grant Agreement

#### Personal Care Attendant (PCA)

a person that assists older adults or individuals with disabilities with daily tasks, also known as a caregiver. A companion, such as a friend or family member, does not count as a PCA unless the companion is acting in the capacity of PCA. An individual's need for a PCA may be unrelated to transportation (such as needing assistance getting on and off a vehicle) but related to other activities that require the PCA to travel with the individual to their destination.

#### Post-delivery Requirements

Buy America and other requirements that must be satisfied before delivered project property can be put into service

#### Private Nonprofit Organization

a corporation or association determined by the Secretary of the Treasury to be an organization described by 26 U.S.C. 501(c) which is exempt from taxation under 26 U.S.C. 501(a) or one which has been determined under state law to be nonprofit and for which the designated state agency has received documentation certifying the status of the nonprofit organization

#### Project

a planned collaborative enterprise using one or more grants

#### Project Property

vehicles and other equipment purchased, in part, with grant funds and used in accordance with a SANDAG grant agreement

#### Public Purpose

the idea that project property disposed of via Assignment must be used primarily to benefit the public. Private benefit, while allowed, must be incidental to the benefit afforded to the public.

#### Public Transportation

"regular, continuing shared-ride surface transportation services that are open to the general public or open to a segment of the general public defined by age, disability, or low income" as per 49 U.S.C. § 5302(14).

## Q

#### Quality Assurance/Quality Control

a process as well as a SANDAG department that verifies the accuracy of SANDAG products

## R

### Regional Transportation Planning Agency (RTPA)

SANDAG's state designation as the agency required to conduct long range transportation planning duties

### Return to Service

the date when project property such as vehicles are placed back into service after being placed out of service for over 14 calendar days

### Revenue

funds generated through the transportation service such as registration fees or donations provided by beneficiaries of the service

### Rolling Stock

the equipment that is used to transport passengers and includes buses, vans, and cars

## S

### Scalable Project

a project whose scope of work can be reduced and still further the grant program goals while providing significant value to the public intended to benefit from the service. SANDAG staff will consider how the project would have scored in the funding allocation process if the scope of work were reduced. If the project would have scored substantially the same with the scaled-down scope of work and the scaled-down project would further the grant program goals and provide significant value to the public intended to benefit from the project, then the project may be scaled.

### Scope of Work

a document included in a grant agreement that specifies the work a grantee has agreed to perform

### Social Equity

the concepts of environmental justice, the federal laws in Title VI of the Civil Rights Act of 1964, and various other federal and state laws intended to promote an equitable distribution of benefits and burdens resulting from SANDAG projects and programs

### Straight Line Depreciation

a method used to determine the value of the remaining useful life of property, which contrasts with fair market value. Straight line depreciation is calculated as a function of time instead of a function of usage. It is based on the premise that an asset's economic usefulness is the same in each year of its useful life.

### Subapplicant

an entity that would serve as a third-party contractor under an applicant if the applicant's proposed project is awarded funding

#### Subrecipient

an organization that receives a grant award from a direct recipient or designated recipient to carry out a portion of a federal program. Section 5310 grantees are considered subrecipients of SANDAG

#### Supplies

all tangible personal property, other than equipment, with a unit value of less than \$5,000

## T

#### Target Population

the population to be served by grant-funded projects. For the Section 5310 program, the target population is both older adults (age 65 and older) and individuals with disabilities of any age. For the Senior Mini-Grant program, the target population is individuals who are age 60 and older.

#### Third-party Contractors

organizations that a grantee can subcontract with to aid in the performance of grant-funded services

#### Title VI

refers to Title VI of the Civil Rights Act of 1964, which prohibits recipients of federal funding from discriminating on the basis of race, color, or national origin

#### Total Project Cost

the sum of the grant award and the matching funds

#### Traditional Section 5310 Projects

Section 5310-funded capital and mobility management projects that are planned, designed, and carried out to meet the special needs of older adults and individuals with disabilities when public transportation is insufficient, unavailable, or inappropriate

#### TransNet

the half-cent sales tax for local transportation projects that was first approved by voters in 1988 and extended in 2004 until 2048

#### Transportation Network Companies

Entities that provide prearranged transportation services for compensation using an online-enabled or platform (e. g. UBER and Lyft)

## U

#### Unit of Service

a performance measure applicable to mobility management projects. Examples of units of service for mobility management projects include the number of travel trainings performed, number of older adults and individuals with disabilities who received travel training, and the number of referrals provided to connect the target population to available transportation resources

## V

### Vehicle Class

a term created by the California Association of Coordinated Transportation/Basin Transit (CALACT/BT) to group vehicle models of similar characteristics such as vehicle size, type, and passenger capacity

### Vehicle Manufacturer

an entity that produces accessible vehicle models and sells them to vehicle vendors

### Vehicle Service Hour (Vehicle Revenue Hour)

the time one or more STGP-funded vehicles are providing service to the target population, measured in hours

### Vehicle Trip

a trip made by one vehicle from origin to destination carrying one or more riders

### Vehicle Type and Configuration

the base vehicle a vehicle manufacturer will modify and reconfigure to create a vehicle model with accessible features

### Vehicle Vendor

an entity that purchases accessible vehicle models from vehicle manufacturers and sells them to SANDAG which is purchasing on behalf of grantees awarded vehicles

### Vital Document

a document that contains information that is critical for obtaining services and/or benefits or is required by law. Vital documents include those that, without translation, would prevent individuals with Limited English Proficiency (LEP) from obtaining access to a recipient's or subrecipient's programs or services or would deprive persons with LEP of an awareness of their legal rights. Whether or not a document is "vital" may depend on the importance of the program, information, encounter, or service involved, and the consequence to the person with LEP if the information is neither accurate nor timely. Examples of vital documents include, but are not limited to, an intake or application form with the potential for important consequences, a notice of a person's rights under ADA and Title VI, a complaint form, and complaint procedures.

## W

### Watch List

a list SANDAG prepares for Policy Advisory Committees and the Independent Taxpayer Oversight Committee during grant status updates, which calls attention to projects that have not made timely progress toward their milestones or have a performance deficiency

### 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

# Chapter 8

## Online Resources Referenced

Coordinated Public Transit – Human Services Transportation Plan (Coordinated Plan):

[SANDAG.org/projects-and-programs/transit/coordinated-plan](https://sandag.org/projects-and-programs/transit/coordinated-plan)

Federal Transit Administration Cardinal Changes Frequently Asked Questions:

[transit.dot.gov/funding/procurement/third-party-procurement/cardinal-changes](https://transit.dot.gov/funding/procurement/third-party-procurement/cardinal-changes)

FTA Circular 4710.1 (ADA Guidance):

[https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/Final\\_FTA\\_ADA\\_Circular\\_C\\_4710.1.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/Final_FTA_ADA_Circular_C_4710.1.pdf)

FTA Transit Asset Management Final Rule:

<https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/Transit%20Asset%20Management%20Final%20Rule.pdf>

SANDAG Board of Directors: [SANDAG.org/meetings-and-events/board-of-directors](https://sandag.org/meetings-and-events/board-of-directors)

SANDAG Board Policy No. 001:

[SANDAG.org/-/media/SANDAG/Documents/PDF/about/about-SANDAG/bylaws-and-policies/board-policy-no-001-2022-11.pdf](https://sandag.org/-/media/SANDAG/Documents/PDF/about/about-SANDAG/bylaws-and-policies/board-policy-no-001-2022-11.pdf)

SANDAG Board Policy No. 009:

[SANDAG.org/-/media/SANDAG/Documents/PDF/about/about-SANDAG/bylaws-and-policies/board-policy-no-009-2022-11.pdf](https://sandag.org/-/media/SANDAG/Documents/PDF/about/about-SANDAG/bylaws-and-policies/board-policy-no-009-2022-11.pdf)

SANDAG Board Policy No. 027:

[SANDAG.org/-/media/SANDAG/Documents/PDF/about/about-SANDAG/bylaws-and-policies/board-policy-no-027.pdf](https://sandag.org/-/media/SANDAG/Documents/PDF/about/about-SANDAG/bylaws-and-policies/board-policy-no-027.pdf)

SANDAG Board Policy No. 028:

[SANDAG.org/-/media/SANDAG/Documents/PDF/about/about-SANDAG/bylaws-and-policies/board-policy-no-028.pdf](https://sandag.org/-/media/SANDAG/Documents/PDF/about/about-SANDAG/bylaws-and-policies/board-policy-no-028.pdf)

SANDAG Board Policy No. 035:

[SANDAG.org/-/media/SANDAG/Documents/PDF/about/about-SANDAG/bylaws-and-policies/board-policy-no-035-2022-11.pdf](https://sandag.org/-/media/SANDAG/Documents/PDF/about/about-SANDAG/bylaws-and-policies/board-policy-no-035-2022-11.pdf)

SANDAG Grants Division: [SANDAG.org/Funding/Grant-Programs](https://sandag.org/Funding/Grant-Programs)

SANDAG Group TAM Plan:

<https://www.sandag.org/-/media/SANDAG/Documents/PDF/funding/grant-programs/specialized-transportation/specialized-transportation-grant/stgp-transit-asset-management-plan-2023-04-04.pdf>

SANDAG Language Assistance Plan: [SANDAG.org/LAP](https://sandag.org/LAP)

SANDAG Regional Plan: [SANDAG.org/Regional-Plan](https://sandag.org/Regional-Plan)

SANDAG Regional Plan Social Equity Working Group:

[SANDAG.org/meetings-and-events/working-groups/social-equity](https://sandag.org/meetings-and-events/working-groups/social-equity)

SANDAG Social Services Transportation Advisory Council:

[SANDAG.org/meetings-and-events/working-groups/social-services-transportation](https://sandag.org/meetings-and-events/working-groups/social-services-transportation)

SANDAG Specialized Transportation:

<https://www.sandag.org/funding/grant-programs/specialized-transportation>.

SANDAG Specialized Transportation Grant Program (STGP): [SANDAG.org/STGP](https://www.sandag.org/STGP)

SANDAG Specialized Transportation Grant Program Report Form:

<https://forms.office.com/Pages/ResponsePage.aspx?id=iVa7K9XZa0CNAs8QArRz54IDbgjW9dJPhPeShQzoZclUOUZaREJTRkw5MU5RTIQ0WkU2STNFnjNBRy4u&wdLOR=cBE0B35F4-2DB7-47F3-B837-F0058D36D734>

SANDAG Transportation Committee:

[SANDAG.org/meetings-and-events/policy-advisory-committees/transportation](https://www.sandag.org/meetings-and-events/policy-advisory-committees/transportation)

SANDAG website: [SANDAG.org](https://www.sandag.org)

TransNet Extension Ordinance: [SANDAG.org/Funding/TransNet](https://www.sandag.org/Funding/TransNet)

TransNet Independent Taxpayer Oversight Committee:

[SANDAG.org/meetings-and-events/transnet-independent-taxpayer-oversight](https://www.sandag.org/meetings-and-events/transnet-independent-taxpayer-oversight)