Section 5310 Subrecipient Oversight: Vehicle Maintenance Policy & Procedures

Policy

As a designated recipient of Federal Transit Administration (FTA) Section 5310 funding, the San Diego Association of Governments (SANDAG) must provide subrecipient oversight to ensure all FTA-funded vehicles are maintained in good operating order pursuant to federal requirements. These policies and procedures will be reviewed annually by the SANDAG to ensure that maintenance of FTA-funded vehicles conforms to the most current FTA requirements.

Responsibilities

The table below outlines the responsibilities of SANDAG and its subrecipients as related to the maintenance of FTA-funded vehicles.

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<th>SUBRECIPIENT</th>
<th>SANDAG</th>
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<td>▪ Develop and submit to SANDAG a maintenance plan</td>
<td>▪ Review subrecipient maintenance plans to ensure they meet FTA requirements and follow acceptable maintenance standards</td>
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<td>▪ Maintain the vehicle(s) at a high level of cleanliness, safety, and mechanical soundness</td>
<td>▪ Conduct a vehicle audit for each FTA-funded vehicle on an annual basis</td>
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<td>▪ Perform preventative and routine maintenance, consistent with the maintenance standards and timelines within the subrecipient’s maintenance plan</td>
<td>▪ Ensure vehicles meet requirements under the Americans with Disabilities Act of 1960</td>
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<td>▪ Maintain maintenance records and make these available to SANDAG and FTA upon request</td>
<td>▪ Ensure actual maintenance practices are consistent with subrecipients’ maintenance plans, such as timely performance of preventative and routine maintenance</td>
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<td>▪ Track mileage and one-way passenger trips</td>
<td>▪ Ensure vehicles are maintained in good operating order pursuant to applicable federal requirements</td>
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<td>▪ Submit quarterly progress reports</td>
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<td>▪ Notify SANDAG immediately if a vehicle is taken out of service for more than three business days</td>
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<td>▪ Operate vehicles in accordance with useful life standards as set forth in FTA C 5010.1E, as amended.</td>
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Procedures

1. **Subrecipient Maintenance Plans.** Subrecipients must submit a vehicle maintenance plan to SANDAG and notify SANDAG when planned modifications to the maintenance plan affect FTA-funded vehicles. Maintenance plans shall outline both preventative and routine maintenance and include intervals (miles, days, or operated hours) at which maintenance will be performed. Subrecipients have discretion to determine appropriate maintenance intervals to accommodate such things as specific manufacturer recommendations, vehicle/vessel age, unique site and operating conditions, etc. SANDAG shall review maintenance plans to ensure they meet FTA requirements and follow acceptable maintenance standards.

2. **Progress Reports.** Subrecipients must submit to SANDAG quarterly progress reports describing the status of the vehicle(s). Progress reports shall include the following information: vehicle identification (description and VIN), weekly average service hours, beginning and ending odometer readings, mileage, one-way passenger trips, planned date(s) of preventative maintenance inspections (PMI) (per subrecipient maintenance plan), date PMI completed, incidental users, any damages and repairs to vehicles.

SANDAG reviews quarterly progress reports to ensure the following:

   a. Vehicle(s) are in service at least 20 hours per week, averaged over the reporting period
   b. Planned PMI intervals are consistent with the subrecipient maintenance plan
   c. PMIs are completed on or near the planned PMI date, allowing for a 10% deviation
   d. At least 80% of trips were provided to seniors and individuals with disabilities consistent with the SANDAG Needs Accommodation Policy
   e. Incidental uses, such as meal delivery, do not interfere with the provision of transportation to seniors and individuals with disabilities

Based on review of progress reports, SANDAG may request that the subrecipient provide additional documentation, including but not limited to maintenance records, accident reports, or insurance claim records. SANDAG shall monitor the progress of subrecipients who have reported vehicle damage or vehicles that have been taken out of service for more than three days to ensure that repairs are completed in a timely manner and the vehicle returned to service.

3. **Records.** Subrecipients must maintain adequate records of vehicle usage including, but not limited to, preventative and routine maintenance, mileage logs, one-way passenger trips, damage reports, and insurance certificates. Additionally, subrecipients must maintain an inventory of FTA-funded vehicles and other equipment. Subrecipients must make these records available to SANDAG and FTA for inspection upon request.

4. **Annual Vehicle Audit / Maintenance Inspections.** SANDAG and FTA have the right to conduct periodic maintenance inspections for the purpose of confirming the existence, condition, and proper maintenance of the vehicle(s). SANDAG shall perform an on-site vehicle audit on an annual basis. While on-site, SANDAG staff shall:

   a. Verify and record the location where the vehicle(s) is/are stored
   b. Photograph the vehicle(s)
   c. Visually inspect the vehicle(s) for damage and record damage, if any
d. Record odometer reading

e. Perform a function test of the following: turn signals, hazards, windshield wipers, brake lights and headlights, stepwell floor light, air conditioner and heater, back up lights and sound, and interlock system

f. Verify the presence of a fire extinguisher, emergency triangles, and seatbelts aboard the vehicle(s)

g. Verify configuration of the vehicle(s) (e.g. number of seats) to confirm that no changes have been made to the vehicle(s) without prior authorization

h. Verify compliance with Americans with Disabilities Act (ADA) requirements. Check that accessibility features are in good operating order by performing the following tests:
   - Deploying lift or ramp
   - Securing tie-downs

i. Visually inspect maintenance records for the past 12 months and record dates of completed PMIs to confirm that completed PMIs occurred as reported by subrecipient in quarterly progress reports and planned/completed PMI intervals are consistent with subrecipient maintenance plan

5. Monitoring. SANDAG allows a ten percent deviation from the planned interval for preventative maintenance included in subrecipients’ maintenance plans. The allowable ten percent deviation applies to both day or hour-based intervals and mileage-based intervals. SANDAG will determine whether subrecipients have performed maintenance on time by reviewing subrecipients’ maintenance plans and inspecting maintenance records at on-site vehicle audits. Should SANDAG determine the subrecipient to be noncompliant, subrecipient must take appropriate corrective action consistent with subrecipient grant agreement requirements.

6. SANDAG Vehicle Inventory. SANDAG shall maintain a vehicle inventory of all FTA-funded vehicles under the Section 5310 program. The inventory shall include: vehicle identification (description, VIN, license plate), vehicle location, date put in service, useful life, mileage at last on-site vehicle audit, dates of completed vehicle audits, determination of timely performance of maintenance, relevant notes (such as accidents or damages), and links to photos of the vehicles.