



Division of Transportation Investment Management (DTIM) Bureau of Transit, Local Roads, Railroads & Harbors (BTLRRH)

Website: <http://wisconsindot.gov>

Judy Egnor
Safety & Compliance Oversight Manager
judy.egnor@dot.wi.gov
(608) 266-8968

COMPLIANCE WITH THE FEDERAL TRANSIT ADMINISTRATION: WHAT YOU NEED TO KNOW

Section 1 | Program Management

- Subrecipients must know what federal and/or state funds you receive and how those funds are distributed amongst your program.
- Subrecipients must have some form of authorizing resolution approved by common council or a governing board that establishes organizational authority to accept federal/state funds for transit program purposes.
- Subrecipients must know who is delegated to sign contract/grant agreements, certifications and assurances, etc.

Section 2 | Financial Management

- Subrecipients must have some form of written financial management and cash control procedures, especially if you are handling fair box revenues.
- Subrecipients must maintain separate accounts for federal and state transit related funds so that expenses and revenues can easily be monitored.
- Subrecipients must regularly reconcile transit project budgets to ensure expenses and revenues are consistent with contract/grant agreements.
- Subrecipients must regularly review transit project budgets to ensure sufficient funds are set aside to cover project expenses and local match dollars until federal funds become available.
- Subrecipients may not use program income generated to reduce the local share of the grant from which it was earned, but may use it for future grants.
- Subrecipients expending \$500,000 or more in federal financial assistance must prepare a single audit pursuant to OMB Circular A-133.

Section 3 | Procurement

- Subrecipients must have some form of written procurement policies.
- Subrecipients must maintain all proper certifications for purchased vehicles on file to ensure that vehicles delivered have met contract specifications (i.e. Buy America Certification, Purchasers Requirement Certification, Federal Motor Vehicle Safety Standards Certification, Vehicle Diagnostic Report, Alignment Certification, Inspection Report, and Insurance Certification).
- Subrecipients are obligated to maintain adequate technical capacity and oversight of third party contracts, including:
 - Written procedures to ensure that equipment, goods, and services are acquired and received as contracted;
 - Lobbying certifications in solicitations from all contractors awarded contracts in excess of \$100,000;
 - Documentation of Buy America on all purchases over \$100,000;
 - Review of the System for Award Management (SAM) found at <https://www.sam.gov> to ensure that none of their contractors are debarred, suspended, ineligible or voluntarily excluded from participating in federally funded transactions;
 - Collection and review of third party service provider's driver's logs, dispatch records, reports and invoices.
- Subrecipients must follow WisDOT specified procurement procedures when purchasing goods or services with federal and/or state funds.

Section 4 | Asset Management

- Subrecipients must ensure assets are used for their originally authorized and intended purpose.
- Subrecipients must maintain a complete and accurate inventory of vehicles, equipment and facilities. Specifically, records must include:
 - Description
 - Acquisition Date

- Location of Use
- ID Number (if applicable)
- Cost
- Condition
- Title Information
- Percentage of state or federal grant share
- Disposition data include date of disposal, sale price and method of determining fair market value
- Procurement Source
- Grant number/contract number
- Subrecipients must update vehicle mileage and condition on BlackCat.
- Subrecipients must prepare and update a vehicle, and facility/equipment maintenance plan. If vehicles are leased, subrecipients must monitor maintenance by collecting maintenance summaries from their lessee and ensuring adequate maintenance is being performed on vehicles.
- Subrecipients must maintain a well-organized file of maintenance records.

Section 5 | Service and Operations

- Subrecipients must provide service that is open to the general public.
- Subrecipients must count ride using actual counts.
- Subrecipients must have a method to track encounters of Limited English Proficiency (LEP) individuals.
- Subrecipients must market their service adequately.
- Subrecipients must keep records relating to service hours, passenger trips and other data required by WisDOT.
- Subrecipients must develop a Transportation Program Manual covering transportation service and operations policies (i.e. employee/volunteer training, passenger assistance, passenger behavior, service animals, oxygen tanks, etc.)

Section 6 | School and Charter Bus

- Subrecipients must notify WisDOT prior to conducting any form of school or charter service. While not prohibited, school and charter service are subject to specific regulations that must be strictly followed.

Section 7 | Civil Rights

- Subrecipients must follow Title VI requirements to ensure no individual is subject to any form of discrimination. Specific Title VI requirements include:
 - Subrecipients must have a completed and up-to-date Title VI Plan. This must be submitted to WisDOT for review and approval.
 - Subrecipients must post Title VI Public Notice in facilities, as well as all vehicles.
- Subrecipients must follow the federal Americans with Disabilities Act (ADA) so that individuals with disabilities are no way discriminated against. Specific ADA requirements vary depending on service provided, however generally include:
 - Subrecipients must allow service animals to accompany individuals with disabilities in vehicles and facilities;
 - Subrecipients must deploy lifts or ramps upon request, for standees as well as wheelchair-users;
 - Subrecipients must accommodate people who use a wide variety of mobility devices;
 - Subrecipients may not deny an individual transportation because a vehicle's securement system is unable to secure the mobility device;
 - Subrecipients must make public information and communications available in accessible formats;
 - Subrecipients must accommodate persons using respirators or portable oxygen;
 - Subrecipients must train operators in the use of accessibility equipment as well as sensitivity to people with disabilities.
 - Subrecipients must allow Personal Care Attendants (PCAs) to travel with person with disabilities at no cost.
 - Subrecipients must track all trip denials.
 - Subrecipients must prepare a Complimentary Paratransit Plan, if applicable.

Section 8 | Miscellaneous Provisions

- Subrecipients must develop and update a Local/Regional Human Service Transportation Coordinated Plan, if applicable.
- Subrecipients must develop a Public Transportation Safety Plan (PTASP) as required by U.S.C. 49 Section 5329(d).
- Subrecipients must provide employees/volunteers with adequate training to ensure service capacity is met.
- Subrecipients must develop and update a Drug and Alcohol Plan, participate in drug and alcohol testing, provide training to safety-sensitive employees, submit annual reports and maintain records related to testing and training, if applicable.
- Subrecipients must maintain a copy of the US Department of Labor Special Section 5333(b) Labor Warranty, as well as post this warranty on an employee bulletin board.