

**Lane Transit District
Project Management Plan
§5310: Enhanced Mobility of Seniors and Individuals with Disabilities**

The Program Management Plan (PMP) outlines the policies and procedures that Lane Transit District uses to administer the Federal Transit Administration's (FTA) Enhanced Mobility Program (§5310). The *Lane Coordinated Public Transportation Plan* is the guiding document for the PMP.

Introduction

Lane Transit District (LTD) receives §5310 funds from two sources. First, as a large urban public transit agency, LTD applies directly through the Federal Transit Administration (FTA) for Federal Enhanced Mobility Program (§5310) funding. In addition, as the State-designated Special Transportation Fund Agency for Lane County, LTD also acts as the pass-through agency for federal §5310 funds that are awarded through the State of Oregon and designated for Lane County, Oregon. LTD's management of the Federal Enhanced Mobility Program emphasizes the integration of older adults and people with disabilities and the multi-modal nature of the community's transportation programs.

This Program Management Plan (PMP) describes Lane Transit District's policies and procedures for administering the Federal Transit Administration's (FTA) §5310 program. This PMP is designed to meet federal requirements and facilitate LTD's management and administration of the §5310 Programs. It will also serve as a guide to the general public and prospective applicants, and to assist FTA in its oversight responsibilities by documenting LTD's policies and procedures for administering these programs.

Program Goals and Objectives

LTD has helped develop a range of transportation services within Lane County using a coordinated and integrated approach. Connecting our community by providing transportation for people with limited resources or limited transportation options has long been one of LTD's guiding principles. Efficiency and cost-effectiveness are also key principles, as is offering a range of services that meet different transportation needs. Adhering to these guiding principles has led to the creation of community- and population-based services. In addition, promoting independent travel opportunities has supported the broader values of self-empowerment and integration that are consistent with contemporary education and employment models for people with disabilities. As a result, LTD has created innovative training and support services intended to benefit older adults and people with disabilities.

LTD has historically used §5310 and STIF Formula Funds together to help fund transportation programs for older adults and people with disabilities. The LTD Statewide Transportation Improvement Fund (STIF) Committee serves as a public process intended to vet and review applications for the use of §5310 funds. LTD staff periodically reviews this Project Management Plan and recommends updates. The STIF Committee is a five to fifteen-member advisory committee made up of riders and providers throughout Lane County. Once the STIF committee completes its review of applications for use of §5310 funds, LTD begins a public review and comment period, which includes gathering feedback from important stakeholders as well as the Metropolitan Planning Organization. The LTD Board of Directors approves the plan once it is completed.

LTD, with guidance from the STIF Committee has established programs and services using the following principles and objectives:

Respect – We honor and dignify all individuals by listening intently to their unique contributions and needs — treating others with trust, care, kindness, and courtesy.

Integrity - We hold all that we say and do to a high standard of honesty, stewardship, ethics, fairness, and compassion.

Innovation - We persist in applying resourcefulness, creativity, and new technology alongside known best practices to best serve our community.

Equity- We commit to listening, learning, and including voices from the diverse identities and abilities of our employees and our community — and we take care to consider how our decision-making processes address historic inequities in transportation.

Safety - We create a safe environment for our employees, customers, and community – and are always willing to reach out to help, support, and assist others in ways that are safe to all involved.

Collaboration - We demonstrate cooperation and excellent team behaviors when working with others — both internally and with our partners in the District — by focusing on common purpose and win-win outcomes.

LTD's Accessible Services focuses on providing transportation services to older adults and people with disabilities who require accommodations and specialized equipment to use public transit effectively, whether using fixed-route service or paratransit. LTD's Accessible Services' reach extends to rural areas within Lane County through coordination, technical assistance, grant writing, and program administration.

The Lane Coordinated Public Transportation Plan, prepared by Lane Transit District, was first drafted and adopted by the LTD Board of Directors in January 2007 – prior to the issuance of guidance by the Federal Transit Administration (FTA). The Lane Coordinated Plan is reviewed biennially to ensure that it is relevant to present conditions; references relevant needs assessments and local planning information; matches needs with preferred coordination practices and projects; lists projects and resources; and reports on public review and comments about the Lane Coordinated Plan.

The Lane Coordinated Plan is recognized and referenced in Lane Transit District's Long Range Transit Plan, which also is adopted by the LTD Board of Directors and included in the regional transportation Planning document, *Central Lane MPO Regional Transportation Plan*, which is prepared and adopted by the Metropolitan Policy Organization. In addition, the Lane Coordinated Plan is included in the Central Lane MPO Unified Planning Work Program.

Roles and Responsibilities

Lane Transit District (LTD) is the agency designated by the Governor of Oregon to administer the §5310 Enhanced Mobility Program in the Eugene-Springfield metropolitan area. LTD is also the designated recipient and administrator of the Statewide Transportation Improvement Fund (STIF)¹ for transportation services benefitting older adults and people with disabilities. LTD coordinates a public process soliciting transportation project applications for the award and distribution of directly received §5310 funds and all funds received through the State of Oregon. LTD also manages the development and update of the area's human services transportation coordinated plan. In addition, it is LTD's role to ensure that not less than 55 percent of §5310

¹ The Statewide Transportation Improvement Fund (STIF) merges with and replaces Oregon's Special Transportation Fund (STF) on July 1, 2023. STIF was created in 2017 by the Oregon Legislature. In its first two bienniums, STIF funds initially came solely from the Oregon "transit tax," which is a state payroll tax equal to one-tenth of 1 percent, while funds for Oregon's Special Transportation Fund (STF), which was created in 1985 by the Oregon Legislature, came from a portion of the cigarette tax revenue as well as excess revenue earned from sales of photo ID Cards and other funds from Oregon Department of Transportation. The STIF program will also be funded by ID card fees, non-highway gas tax, and cigarette tax revenues once its merger with the Special Transportation Fund (STF) is effective July 1, 2023. These funds are distributed biannually through a formula based on population to 42 designated entities, called STIF Agencies. These funds typically are used to leverage federal funds. STIF Agencies are required to coordinate distribution of funds for projects that benefit the mobility of older adults and people with disabilities throughout their jurisdictions

funds received are used for traditional §5310 projects – those public transportation 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.

The state of Oregon distributes state, FTA, and ODOT Surface Transportation Program funds biannually for transportation projects that enhance the mobility of older adults and individuals with disabilities that go beyond traditional services. These funds included Federal §5310, §5311, §5311(f), and State STIF funds.

The LTD Board has opportunity for review and authority over both the PMP and the Lane Coordinated Plan. The LTD Board appoints a STIF Committee² made up of stakeholders knowledgeable about the transportation needs of older adults and people with disabilities. There are 5-15 appointed members who serve on the Committee with representation from a variety of disabilities, rural and metro areas of Lane County, and other interested parties who attend regularly. LTD typically convenes the STIF Committee as necessary to recommend grant funding allocations to support programs for older adults and people with disabilities. This Committee provides funding recommendations to the LTD Board based on the priorities stated in the Lane Coordinated Public Transportation Plan. The LTD Board then holds a public review process and forwards its final recommendation to the LTD General Manager, who is authorized by the LTD Board to submit grant applications.

Local governments and stakeholder groups participate in the update of the Lane Coordinated Public Transportation Plan. These entities also provide services to older adults and people with disabilities.

Applicants and recipients (including private providers and local applicants) both participate in the coordinated plan update process. Applicants participate in grant workshops to learn what is expected should they choose to apply for funds. Applicants develop program proposals and submit them to the grant review committee. Recipients, as the direct service providers, provide good customer service and provide the required fiscal management and reporting per contract and federal guidelines.

Coordination

LTD serves as the lead agency for public transit and human services transportation coordination in the area. In this capacity, LTD is required to:

- Develop and adopt a local transportation coordination plan;
- Coordinate the project application and public comment processes for the local area;
- Review and rank applications for projects benefitting older adults, people with low income, and people with disabilities, and ensure that projects are derived from the Coordinated Plan; and
- Follow a protest process and procedure to resolve funding decision conflicts.

All projects must be reflected in the Coordinated Plan. Local agencies and service providers participate in the update of the plan. Metro area projects are required to complement or alleviate demand for the metro ADA paratransit service. Rural projects must have full support of local jurisdictions, including a contribution towards required match.

LTD operates a regional transportation brokerage, The RideSource Call Center, within which most of the funded projects are coordinated through mobility management and dispatching efforts. For example, ADA, Veterans, and Medicaid non-emergency medical transportation trips are managed by the Call Center. LTD

² The STIF Committee is a five to fifteen-member advisory committee to Lane Transit District made up of riders and providers throughout Lane County. It is a committee that is required by the State to oversee distribution of STIF funds.

coordinates service delivery with local DHS agencies and encourages the offering of shared rides between programs along with other efforts to enhance the quality and efficiency of service delivery.

The State of Oregon ensures that projects funds are contained within the Coordinated Human Services Transportation Plan. They are a resource for grantees and require coordination when determining which projects to fund with statewide §5310 funds. LTD's process to award directly received §5310 funds is a component of the coordinated effort to plan and fund projects within Lane County.

Eligible Sub-recipients

State or local government authorities, private for-profit organizations, non-profit organizations, and/or public transit operators are eligible to receive funds as subrecipients. As the designated recipient, LTD abides by Federal eligibility requirements. LTD conducts a competitive procurement process to allocate program funds. All applicants must be able to meet the required terms and conditions of grants administered under the Federal Transit Administration (FTA). A signed copy of the FTA's certifications and assurances must be submitted to LTD.

Local Share and Local Funding Requirements

Local matching funds must be assigned to and be included in each project budget. Eligible local and non-U.S. DOT federal funds may be used for local match. Different levels of local matching funds are required for different types of projects. LTD verifies all sources of matching funds for eligibility, applicability to eligible program costs, their sole use as match for the defined program, and availability to the project.

Applicants are notified that the use of some types of non-cash contributions is allowed but restricted. Applicants are requested to contact LTD to find out whether volunteer or other in-kind contributions for a project would be allowed as part of the local match contribution to the project. If permitted, the value of the non-cash contributions must be documented and represent a cost which otherwise would be eligible under the program and be included in the project budget.

Project Selection Criteria

LTD, as the lead agency, conducts a public, competitive process to solicit project proposals that enhance mobility for older adults and people with disabilities. This is a coordinated process used for project selection for directly received §5310 funds and funds received through the State of Oregon. This process coincides with the announcement of funding availability from the State and is typically a four-month biennial process that begins in late fall or early winter. A grant review committee is convened that includes members appointed by the LTD Board of Directors, governed by formal committee bylaws.

Proposed projects are evaluated on these criteria:

- Projects are derived from and support the Lane Coordinated Plan.
- Projects are eligible under the grant program guidelines.
- Agencies have the fiscal and operational expertise needed to comply with administrative and grant reporting requirements.
- Matching funds are clearly identified, come from permissible sources, and are not already committed to another grant-funded project.
- Projects are cost effective.
- Projects do not unnecessarily duplicate existing service.
- The budget is appropriate to the scale of the project.
- Project helps improve coordination and supports the effective use of public resources.

Annual Program of Project Development and Approval Process

The consolidated program of project development and approval for both directly received §5310 funds and funds received from the State of Oregon coincides with ODOT Public Transit Division's grant application process and includes funding under Federal §5310, §5311, §5311(f), and State STIF programs. The intent is to provide a better opportunity for coordination of projects and funding sources. ODOT operates on a two-year cycle with annual updates.

LTD conducts a public process that provides technical assistance to potential applicants. All interested parties are encouraged to attend the workshops as well as the Grant Review Committee meetings. A sample process for §5310 projects:

- Notice of Fund Availability (Published Notice)
- Workshops (Technical Assistance)
- Applications due to LTD
- Application Review Committee Meeting(s)
- Funding Recommendations published and forwarded to STIF Committee members and applicants.
- Public Comment / Protest Period
- LTD Board Approval –Board authorizes General Manager to sign applications
- Applications are processed with FTA for direct §5310 funded projects and to the state for all other projects

During the grant review process, projects for funding are reviewed to ensure that the recommended project list meets the 55% traditional project requirement. If the recommended list does not meet the requirement, then the committee will reallocate funding to projects to ensure that the requirement is met.

Projects to be funded with direct §5310 funds through application to the Federal Transit Administration are reported to FTA on their own §5310 program of projects. These projects are included in the project list developed through the grant review process.

Administration, Planning, and Technical Assistance

LTD supplies a high level of coordination and technical assistance to area transportation providers and human services agencies. LTD provides grant administration, contract oversight, graphic design, communications, and publications support. LTD may use the 10 percent administrative allotment allowable under §5310 funding for these support activities.

Transfer of Funds

LTD will not transfer directly received urban §5310 funds between rural and small urbanized areas. The State has a statewide program for meeting those objectives of §5310.

Private Sector Participation

LTD's centralized call center dispatches rides to a variety of private providers that provide a variety of human service transportation trips, including ADA paratransit trips.

LTD advertises the availability of funds through legal ads in the regional newspaper and e-mail notifications to a broad spectrum of providers and interested parties that includes private providers. In addition, the notice is posted on the LTD website.

Civil Rights

LTD uses a variety of methods to disseminate information and to notify interested and affected public members of their rights under Title VI and to keep them informed about specific projects and progress. LTD alerts stakeholders to participation opportunities. Dissemination of project information is timed to coincide with milestone events. At times, LTD project managers issue additional project-related information outside of key project milestones to provide the public with newly surfaced information or encourage increased participation. The following methods are used: project newsletter, project flyers and postcards, media communications, website, public open houses, and speakers' bureau.

LTD also creates ad-hoc advisory committees that provide additional opportunities for involvement and feedback to get a well-rounded representation from communities.

For individuals who are limited English proficient (LEP), the most visible and critical piece of service information (LTD's Rider's Digest) is translated into Spanish. Customers are informed that any information about District operations will be translated upon request. Most written translations are handled through a contract with a local translator.

As part of the Title VI Quality of Service review, LTD works with the Lane Council of Governments (LCOG) to conduct an analysis using the Census Transportation Planning Package. This data has identified the primary block groups with the largest minority populations. Service planning staff uses this data as major service decisions are analyzed.

Lane Transit District has had no restrictions placed on its EEO program approval by the FTA.

Employment-related and Civil Rights complaints are handled through LTD's Human Resources Department. There have been no such complaints in the past three years. Transit Operations and the Customer Service Center use an on-line system to keep track of service-related ADA complaints and appropriate follow-up. The RideSource (ADA paratransit) staff also uses a record keeping system. Employment-related complaints at RideSource are handled by the contractor's local management. Civil Rights complaints are handled by the contractor's administrative office. The contractor uses similar forms and procedures for responding to and tracking complaints, and discloses all complaints to the grantee on a regular basis. Paratransit program complaints are recorded in the paratransit operations database and investigated by the local contractor's management staff.

LTD develops and submits an annual DBE program to FTA for approval, and per FTA Region 10, the program has been approved. LTD develops overall annual DBE goals relative to the availability of DBEs in the area. These calculations are included as documentation in the annual goal submission to FTA. The Uniform Report of DBE Awards or Commitments and Payments has been submitted to FTA semiannually.

LTD monitors sub-recipient contracts on a monthly, quarterly, and annual basis. Monthly monitoring occurs through individual invoices that are received from sub-recipients that include project data, such as ridership counts by population type. Quarterly reports are submitted by the sub-recipients that include vehicle data and Title VI, DBE, and EEO complaint reports. Annual site visits include a review of required Civil Rights documentation and Civil Rights activity as well as ensuring that required postings are posted in an accessible location and are up to date. LTD has an aspirational goal for DBE participation, and is race- and gender-neutral. As such, we are prohibited from requiring contractors (subrecipients of grant funding) to secure any particular DBE goal percentage under LTD contracts. LTD does encourage the use of DBE firms where possible, but we cannot require it. Subrecipients are asked to provide an estimated level (%) of DBE participation they will be able to obtain under their contracts, and monthly reporting is required.

Title VI, Section 504, and ADA Reporting

LTD requires sub-recipients to document that they distribute FTA funds without regard to race, color, national origin, disability or discrimination against disadvantaged business enterprises among applicable civil rights requirements. Not all applicable civil rights requirements are discussed in the PMP.

LTD complies with FTA's Title VI requirements in the following manner:

- i. Provision of an annual Title VI certification and assurance;
- ii. Development of Title VI complaint procedures;
- iii. Record keeping of all Title VI investigations, complaints and lawsuits;
- iv. Provision of meaningful access to persons with Limited English Proficiency;
- v. Notification to beneficiaries of protection under Title VI;
- vi. A requirement that each sub-recipient develops a Title VI program or becomes part of LTD's submittal of its Title VI program to the FTA's regional civil rights officer once every three years.

LTD's promotion, administration, and distribution of information and funding relevant to the 5310 programs is consistent with LTD's Title VI Policy.

In order to fulfill Section 504 obligations, LTD plans on working closely with its sub-recipients to ensure the goals of their federal §5310 grants are being met. In order to track this progress, LTD will review each submitted invoice and ensure that all required backup material is attached and correct in order to validate funds spent, work to resolve any potential ineligibility issues with any sub-recipient, and obtain the return of any funds paid out that have been found to have been ineligible. In addition, LTD will review all quarterly and annual reports to ensure consistency with the terms of the federal grant and contracts. Finally, LTD will make annual site visits to each sub-recipient to ensure purchased items, service and/or training funded by the federal grant are in full service, are being maintained as per manufacturer's recommendations, and are being used to meet the performance measures set in the contract and in federal guidelines.

LTD will evaluate all projects receiving grant funds for compliance with all relevant ADA laws, regulations, and policies. Moreover, LTD will work with sub-recipients to provide technical assistance.

LTD requires all sub-recipients to submit certifications and assurances annually in accordance with the FTA's annual process. When applicable, LTD will obtain and review ADA and Section 504 policies and reports to ensure compliance.

Program Measures

Lane Transit District will gather and report program measures required by federal guidelines. These include:

- Traditional §5310 Projects
 - Gaps in service filled
 - Ridership
- Other §5310 Projects
 - Increases or enhancements related to geographic coverage, service quality and/or service times that impact the availability of transportation services for older adults and individuals with disabilities.
 - Additions or changes to physical infrastructure (e.g., transportation facilities, sidewalks.), technology, and vehicles that impact availability of transportation services for older adults and individuals with disabilities.
 - Actual or estimated number of rides (as measured by one-way trips) provided for older adults and individuals with disabilities.

Where applicable, these measures will be reported by the sub-recipient to LTD. LTD will gather all performance measure data and report in total to the FTA on an annual basis or as requested by FTA.

The sub-recipients will also work jointly with LTD to establish other performance indicators that are more specific to their projects to measure relevant outputs, service levels, and outcomes. Sub-recipients will be required to report these performance measures quarterly, annually, and as required by LTD and the FTA.

Program Management

This Program Management Plan (PMP) describes Lane Transit District's policies and procedures for administering the Federal Transit Administration's (FTA) §5310 program. This PMP is designed to meet federal requirements and facilitate LTD's management and administration of the §5310 Programs. It will also serve as a guide to the general public and prospective applicants and to assist FTA in its oversight responsibilities by documenting LTD's policies and procedures for administering these programs.

LTD has assigned a staff person as project manager for its Program Management Plan. The project manager, or their designee, will be responsible for reviewing and processing all reports, plans, and certifications required to be submitted under these regulations. LTD will review information provided by the sub-recipients of §5310 funds on a quarterly basis at a minimum. In addition, records will be checked as part of the sub-recipient monitoring plans during site visits.

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

Accounting Systems, Financial Management, and Reporting

LTD as the sole direct recipient, has an established accounting and reporting system that meets or exceeds FTA requirements for financial management. In addition, all sub-recipients must assure LTD that each has fiscal control and accounting procedures that will permit preparation of the required reports as well as a level of expenditures adequate to establish that such funds are used consistent with the rules and requirements of the program.

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

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

Procurement, Property Management, Vehicle Use, Maintenance and Disposition

As the Designated Recipient for §5310 funding, LTD will manage capital from procurement until disposition using FTA-required processes and management reviews. Sub-recipients do not procure vehicles or equipment. Sub-recipients will be responsible for property management, vehicle use, and maintenance. They will be required to follow all federal guidelines that govern these activities. LTD will monitor these activities through monthly/quarterly/annual report review and site visit verifications. LTD will be responsible for all disposition of property procured with federal funds under LTD's management. All dispositions will follow FTA rules under §5310.

Audits and Close-Outs

Sub-recipients are responsible for securing organization-wide or grant specific audits. An annual audit is conducted on all LTD activities, including activities under the §5310 program, in accordance with Office of Management and Budget, Circular A-133 or 2 CFR 200 Subpart 500. LTD is responsible for reviewing all audit reports and appropriately resolving and reporting any findings.

LTD will perform a project closeout with sub-recipients within 90 days after all funds are expended and all work activities for the project are completed. LTD will initiate program of project (POP) closeout with FTA within 90 days after all work activities for the POP are completed. LTD will electronically submit a final Federal Financial Report (SF 425), final budget, and final POP via the TEAM system at the time of closeout.

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

Other Provisions

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

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

1. Quarterly and annual program of projects reporting on each FTA grant contract
2. Milestone activity reports – filed with quarterly and annual program of project reports
3. Financial status reports – Submitted quarterly and annually
4. Program measures – Submitted quarterly and annually
5. Disadvantaged Business Enterprise (DBE) reports – as required for contracts in excess of \$250,000

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

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

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

3. Sub-recipients will be prepared to file quarterly reports by the 15th of April, July, October and January. The quarterly reports will include all required submissions for monthly reporting and include the following additional information:

- a. A review of contract compliance;
- b. An analysis of the status of the project relative to project obligations in the contract;
- c. Recommendations for corrective actions, as required; and
- d. Recommendations for contract amendment, if desired.

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

Since LTD will be handling all procurements of vehicles and other capital items, LTD will manage all environmental processes and ensure Buy America provisions are followed to ensure compliance with FTA requirements found in FTA Circular 9070.1, 4220.1, and 5010.1. Any FTA requirements borne by sub-recipients, like preventive maintenance, will be reviewed during site visits and through periodic reporting. All other federal requirements that sub-recipients are required to meet will be outlined within the contract and reviewed through periodic reporting and site visits.