

Title VI Program of Valley Regional Transit

The Regional Public Transportation Authority of Ada and Canyon Counties, Idaho
(2021-2023)

Submitted in Fulfillment of

Title VI of the Civil Rights Act of 1964 and
FTA Circular 4702.1B (October 1, 2012)



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Introduction

This report documents the efforts of Valley Regional Transit (VRT), the regional public transportation authority of Ada and Canyon counties, to provide a level of transit service that is fairly distributed to all of the authority populations to the extent possible. The content and organization of this report is based on the guidelines of FTA Circular FTA C 4702.1B (October 1, 2012), —Title VI Requirements and Guidelines for Federal Transit Administration Recipients.

Questions regarding the content or preparation of this report should be directed to Kelli Badesheim, VRT Executive Director.

Annual Civil Rights (Title VI) Assurances

VRT enters the annual Certification and Assurances into TEAM each year and provides an electronic signature through a personal identification number (PIN). A signed copy of the Annual Civil Rights Title VI Assurances for 2021 is attached as **Attachment A**. VRT executive director also signs a hard copy each year.

Notification of Valley Regional Transit's Title VI obligations

Valley Regional Transit publicizes its Title VI program by posting its commitment to providing services without regard to race, color, or national origin at Valley Regional Transit, on its ValleyRide buses, at its main office in Meridian, ID, and at operations facilities in Caldwell and Boise, and on its website: www.valleyregionaltransit.org. A copy of the notice can be found in **Attachment B**.

The complete Title VI Policy Statement is included as **Attachment C**.

Title VI Complaint Procedures

VRT has developed complaint procedures for filing, investigating and tracking Title VI complaints filed against the authority. VRT's complaint procedure is available on the Web and on the revenue service vehicles, and in public view at capital facilities.

The complaint procedures are as follows:

- 1. File a Complaint:** Any person who believes that he or she has been excluded from participation in or denied the benefits of VRT's programs, activities or services due to discrimination, may file a complaint with VRT within 180 days from the date of the alleged discrimination. VRT encourages use of its complaint form which is available on the VRT Website at <http://www.valleyregionaltransit.org> or by calling 208-345-7433.

Filed complaints must meet specific requirements including the following;

- a) Be in writing with signature of complainant
- b) Include date of alleged discrimination
- c) Include a detailed description of the issues
- d) Be within 180 days of the incident

Complaints can be filed by;

mail addressed to:

Title VI Coordinator 700
NE 2nd St
Suite 100
Meridian ID 83642

fax addressed to: Title VI Coordinator, 208-846-8564

email to TitleVICoordinator@valleyregionaltransit.org

- 2. Record the Complaint:** Within 10 days of the complaint, the VRT Title VI Coordinator will record the complaint in a database determine its jurisdiction, acceptability and/or need for additional information and assign an investigator. VRT will provide written acknowledgement of complaint and whether it has accepted or rejected the complaint to the complainant.
- 3. Investigate the Complaint:** An investigation of the complaint will occur within 60 days of the complaint. The investigation may include interviews of individuals named as witnesses or other individuals who may have information. The investigator may review relevant documentation. Failure of the complainant to respond to requests for information from the investigator may result in closure of the complaint.
- 4. Resolve the Complaint:** Within 90 days of the complaint, the complainant will receive a final written response from VRT including the proposed disposition of the matter and their right to appeal. VRT will also provide the appropriate Federal or State agency with a copy of the decision.

VRT also notifies the public of their right to file their complaint with the U.S. Department of Transportation with the following notice.

Title VI Complaint to the U.S. Department of Transportation

Individuals or organizations who believe they have been denied the benefits of, excluded from participation in, or subject to the discrimination on the grounds, of race, color or national origin may submit a complaint to the U.S. Department of Transportation:

Federal Transit Administration's Office of Civil Rights

Attention: Title VI Program Coordinator East

Building, 5th Floor-TCR

1200 New Jersey Ave, SE

Washington, DC 20590

Further information, including the complaint form, is available at www.fta.dot.gov. The complete complaint procedure is included in **Attachment D**.

The complaint form is included as **Attachment E**.

Title VI Investigations, Complaints and Lawsuits

VRT's data related to allegations of discrimination, both with respect to employment and in the provision of transit services, comes from several sources. The data includes customer reports, reports to federal and state regulatory agencies, lawsuits filed in federal, state or local courts, and internal employee complaints.

Customer Reports

Customer complaints are collected from the public through VRT's customer call center at 208-345-RIDE (7433). The call center is supported by VRT's Customer Service Department. Calls are tracked in Service Desk, a module of VRT's Fleet-Net information management system. Each complaint is assigned a unique tracking number and tracked by the Customer Service Coordinator through the resolution of the complaint.

VRT received no Title VI related complaints from a customer during the report period.

Employee Reports

VRT received no Title VI related complaints from current or former employees during the report period.

Summary of Title VI Compliance Reviews

No compliance reviews were conducted during the reporting period.

Public Participation

VRT's Public Involvement Policy outlines the agency's process for soliciting and considering public comment prior to implementing fare changes, service changes or adjustments or adoption of, or modifications to, the VRT annual budget. A minor service adjustment is defined as any change in route length, frequency, route path, stop location or amenity work done to a lesser extent, or in smaller amounts, than described as a major service change. A major service adjustment is defined as any change that would add or eliminate more than twenty-five percent (25%) or more of route revenue miles of a single route or affects twenty-five percent (25%) or more of the number of route vehicle miles on any individual route commuted on a daily basis for the day(s) impacted by the change or result in a route eliminate or new route creation. A public hearing and comment period are mandatory for any fare changes.

In the effort to get meaning full input from the entire public, including minority and low income populations VRT will hold a series of open houses, public meetings and/or public hearings and advertise the outreach to and with advocacy groups and social service agencies in an effort to reach affected populations.

On October 1, 2019, VRT implemented its first fare in 16 years. Below is the previous and current fare structures:

	Local Pre Fare Change	Local Current	Universal Pre Fare Change	Universal Current
Single Trip				
Adult	\$1.00	\$1.50	\$3.00	\$4.50
Discounted Fare*	\$0.50	\$0.75	\$1.50	\$2.25
One Day Pass				
Adult	\$2.00	\$2.50	\$6.00	\$7.50
Discounted Fare*	\$1.00	\$1.25	\$3.00	\$3.75
31-Day Pass				
Adult	\$36.00	\$42.00	\$70.00	\$90.00
Discounted Fare*	\$18.00	\$21.00	\$35.00	\$45.00
31-Day Employer Pass	\$32.00	Discontinued	\$62.00	Discontinued
3-Month Pass	\$93.00	Discontinued	\$180.00	Discontinued
6-Month Pass	\$165.00	Discontinued	\$320.00	Discontinued
Annual Pass	\$266.00	\$282.00	\$516.00	\$549.00
Stored Value Card	Pre Fare Change		Current	
	\$10 for \$12 stored value		\$10 for \$13.50 stored value	
	\$20 of \$24 stored value		\$20 for \$27.00 stored value	
Non-Profit Agency				
Day Pass	\$1.50	\$1.90	\$4.50	\$5.60
31-Day Pass	\$27.00	\$31.50	\$52.00	\$68.00
Single purchase of \$5,000 or more	30% discount on any fare type		30% discount on any fare type	
Single purchase of \$10,000 or more	50% discount on any fare type		50% discount on any fare type	
ACCESS Fares	Eligible Passenger Pre Fare Change	Eligible Passenger Current	Guest/Companion Pre Fare Change	Guest/Companion Current
Single Trip	\$2.00	\$3.00	\$2.00	\$3.00
10-Ride Ticket Book	\$20.00	\$30.00	N/A	N/A
*Discount fares are available for youth (ages 6-18), Senior (ages 65+) and persons with a disability				

VRT has had 4 service adjustments during the report period.

2018 Service Change	
Route/Area	Change
Nampa/Caldwell Fixed Route Service	- Routes 51, 52, 53 and 54 were consolidated down to 2 routes, 51 and 52. - Route 52 extended to serve the Treasure Valley Marketplace.
Intercounty Service	Route 42 extended from terminus at the College of Western Idaho to Happy Day Transit Center, providing all-day connection between Cleveland Boulevard, Meridian and the Boise Town Square Mall.

2019 Service Change	
Route/Area	Change
1: Harris Ranch via Parkcenter	- Consolidate the Route 1 Parkcenter and the Route 18 Harris Ranch to a single route - Frequency reduced from 30-minutes in peak hours to 60 minutes all day
2: Broadway	Restructured to provide streamlined two-way service and serve areas formerly served by the 1 Parkcenter.
3: Vista	- Improved peak period span to 15 minute frequency - Increased span of service to 9:15 pm
4: Roosevelt	Extended to the Boise Airport
5: Emerald	Rerouted, no longer serves Barrister
9: State Street	Improved peak period frequency to 15 minutes
9x: State Street Express	Service eliminated, no longer providing service to Carlton Bay and Horseshoe Bend stop
10: Hill Road	- Route 10 Hill Road and Route 14 Hyde Park consolidated and rerouted - Reduced duplication of service on State Street - Smaller service area in North End - Some riders have to walk further to stops - No weekend service in the North End - Hyde Park riders now served by the 16 VA/Hyde Park Loop
11: Garden City	Service hours changed to Peak Only
12: Maple Grove	De-coupled from the Route 10
16: VA/Hyde Park	- Rerouted - Provides more direct, two-way service for the North End and Hyde Park - More direct connections between downtown Boise and the VA - Shorter route, smaller service area
17: Warm Springs	Rerouted, no longer serves Park and Walnut
28: Cole/Victory	Rerouted to Barrister to pick up stops no longer served by the 5
42: Happy Day Transit Center to Towne Square Mall	- Streamlined route - Provide service on Overland, connecting to more riders in Meridian - Route now serves Nampa St. Luke's and the Ten Mile Crossing
51: East Nampa	- Midday service reduction - Route no longer serves Garrity - Connections to CWI are longer

2020 Service Change	
Route/Area	Change
1: Harris Ranch via Parkcenter	• New pathway on Parkcenter, no longer providing service on Apple, Bown and Boise Avenue, providing additional service on Parkcenter. • Stops that are no longer served by the 1 on Boise Avenue are covered by the Route 2
2: Broadway	• Later service until 9:30 on weekdays. • New path on Front Street, no longer serving Idaho.
4: Roosevelt	• New route path on River Street, no longer provides service on 13th and Shoreline drive.
3: Vista	• Saturday service extended until 9 pm
7A: Fairview/Ustick	• Saturday service extended until 9 pm
7B: Fairview–Towne Square Mall	• Saturday service extended until 9 pm
9: State Street	• Limited service to Eagle during the peak service period (4 am trips and 3 pm trips. • Inbound trips have a new pathway at Saxton • Service reestablished to stop at Carlton Bay and Horseshoe Bend (previously served by the 9x) • Saturday service extended until 9 pm
150: VRT OnDemand	• New on demand service in Canyon County providing more flexibility and greater access for Canyon County riders. • Routes 51 East Nampa, 52 Caldwell Boulevard and 55 CWI Shuttle were eliminated and replaced with the new on demand service.

The Public Participation Plan is included as **Attachment F**.

Language Assistance Plan

Language Assistance

- 1) The number or proportion of LEP persons eligible in the VRT service area who may be served or likely to encounter VRT service;
- 2) The frequency with which LEP individuals come in contact with VRT services;
- 3) The nature and importance of the program, activity or service provided by VRT to the LEP population; and
- 4) The resources available to VRT and overall costs to provide LEP assistance.

The plan also details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates.

Findings

A summary of the four factor analysis findings is provided below.

Factor 1: The number or proportion of LEP persons in the service area who may be served by Valley Regional Transit

According to the 2018 American Community Survey, 3% of Ada County's population speak English less than very well and 7% of Canyon County's population speak English less than very well. Spanish is, the most common single language spoken by those who indicate they do not speak English very well in both counties. However, in part because of the significant refugee resettlement programs in Boise, of those who do not speak English very well, Ada County has a plurality of languages spoken with more people speaking Indo-European or Asian and Pacific Island languages than Spanish. See tables 1

VRT Service Area Population Indicating They Speak English Less Than Very Well

Language	Ada County	Canyon County	Combined
Spanish or Spanish Creole	5,225	12,768	17,993
Other Indo-European languages	2,382	612	2,994
Asian and Pacific Island languages	3,247	425	3,672
Other languages	1,530	150	1,680
Total Population speaking English less than "very well"	12,384	13,955	26,339
Total Population	419,473	195,845	615,318
Percent Population speaking English less than "very well"	3%	7%	4%

Source: 2018 American Community Survey 5-Year Estimates

Further analysis shows that of the 26,339 individuals in Ada and Canyon Counties who speak English less than well, 17,993 speak Spanish at home, 2,994 speak other Indo-European languages, 3,672 speak Asian and Pacific Island languages and 1,680 speak Other languages.

Also, according to the Refugee Processing Center, since 2000, Idaho has resettled more than 11,000 refugees. Boise, located in Ada County is one of two refugee resettlement cities in Idaho and until recently resettled approximately 700 refugee each year. According to the Refugee Processing Center, in FY 2020, only 190 refugees were settled in Idaho. Over the last ten years there are nine main languages spoken by refugees in Idaho. Those languages are Kinyarwanda/Swahili, Kurdish/Arabic, Karen/Kayah/Burmese, Somali, Dari/Persian/Farsi, Nepali, and Kunama. Table 2 is the percent of refugees speaking these languages that have resettled in Idaho between 2010 and 2015.

Percent of Refugees Resettled in Idaho Speaking Various Languages

Languages	2010	2011	2014	2015	2018
Kinyarwanda/Swahili		10%	16%	26%	28%
Kurdish/Arabic	23%	15%	29%	13%	12%
Karen/Kayah/Burmese	5%	25%	12%	11%	0.5%
Somali			15%	9%	
Dari/Persian/Farsi	5%		3%	9%	2%
Nepali	32%	50%	12%	4%	4%
Kunama			2%	8%	
Bembe					22%
Kinyabwisha					6

Sources: Idaho Health and Welfare: Idaho Office for Refugees PowerPoint, U.S. Department of Health & Human Services Office of Refugee Resettlement: Refugee Arrivals 2011, 2014, and 2015, Idaho Office for Refugees Idaho Refugee Languages 2018

Factor 2: The frequency with which LEP individuals contact with your programs, activities and services.

VRT assesses the frequency at which LEP individuals contact our programs. In 2014 an on-board survey was conducted. We also track how often our customer service representatives are requested to provide language supports.

Both these efforts support the findings in Factor 1 that Spanish is the most frequently requested language support. VRT Customer Service expects to receive approximately 18 Spanish line requests per month. VRT Customer Service staff also have access to a language line – an over the phone interpreting service. This service is only used 2-3 times per year.

The on-board survey found that approximately 2.7% of our rider’s system-wide spoke Spanish or Creole only and 2.3% spoke some other language.

Factor 3: The importance to LEP persons of your program, activities, and services Transportation is critical to many of the daily needs of LEP and the general population.

As demonstrated in Factor 2, VRT’s fixed route system comes in contact with people with limited English proficiency. VRT’s other services such as the GoRide Job Access services also provide many opportunities to support LEP populations in their search for work. This is especially true of the newly settled refugee populations.

Transit services are important to those LEP persons who need to access them. They connect them to their jobs, healthcare, educational and other life enriching opportunities.

Factor 4: The resources available to the recipient and costs

VRT has Spanish speaking staff and access to the language line to accommodate other languages. Given the influx of refugees who are both new to the area and have language barriers, VRT has worked with the English Language Center in Boise to provide training on using the transit system.

The full LEP plan and its four factor analysis is attached as **Attachment G**.

Language Assistance Actions

As a result of the findings of the four factor LEP plan, VRT employs the following solutions to ensure people with limited English proficiency are reasonably accommodated:

- ☐ VRT will translate vital documents including fare information and “how to ride” brochures into Spanish and Chinese.
- ☐ VRT customer service employs a one full time position that is designated as a Bilingual Customer Service Specialist and must be fluent in both English and Spanish.
- ☐ VRT staff has initiated language specific travel training sessions in coordination with local resettlement agencies.
- ☐ VRT Customer Service utilizes LanguageLine Solutions (www.language.com) for translation services in the occasion that a customer calls in as is not able to communicate with one of our customer service specialists.
- ☐ Provide translation of materials including meeting notices, flyers and agendas upon request, or when warranted by the target audience.
- ☐ Train staff on VRT’s Title VI Policy and LEP responsibilities and document Language Line use and requests.
- ☐ VRT customer service staff and drivers utilize LanguageLine brochures to both identify the appropriate language and get the translation services necessary.
- ☐ VRT advertises the availability of LanguageLine at Main Street Station with a poster stating language assistance is available.
- ☐ As mentioned in the LEP plan, VRT will review language barriers that exist and the appropriateness of VRT’s actions to minimize or remove those barriers.

Figure 1: Example Language card in Swahili

I want to go home. Route ____ Stop ____ to Route ____ Stop ____ 	Ninataka kuenda nyumbani. Njia ya ____ Vituo vya mabasi ____ kwa Njia ya ____ Vituo vya mabasi ____
I want to go to the doctor's office. Route ____ Stop ____ to Route ____ Stop ____ 	Ninataka kuenda madaktari ofisi. Njia ya ____ Vituo vya mabasi ____ kwa Njia ya ____ Vituo vya mabasi ____
I want to go to the grocery store. Route ____ Stop ____ to Route ____ Stop ____ 	Ninataka kuenda dukani. Njia ya ____ Vituo vya mabasi ____ kwa Njia ya ____ Vituo vya mabasi ____
I want to go to the English Language Center Route ____ Stop ____ to Route ____ Stop ____ 	Ninataka kuenda darasani ya Kiingereza. Njia ya ____ Vituo vya mabasi ____ kwa Njia ya ____ Vituo vya mabasi ____
I want to go to work at _____ Route ____ Stop ____ to Route ____ Stop ____ 	Ninataka kuenda kazi katika _____. Njia ya ____ Vituo vya mabasi ____ kwa Njia ya ____ Vituo vya mabasi ____
I want to go to the WIC Office. Route ____ Stop ____ to Route ____ Stop ____ 	Ninataka kuenda WIC ofisi. Njia ya ____ Vituo vya mabasi ____ kwa Njia ya ____ Vituo vya mabasi ____
I want to go to the IRC. Route ____ Stop ____ to Route ____ Stop ____ 	Ninataka kuenda IRC. Njia ya ____ Vituo vya mabasi ____ kwa Njia ya ____ Vituo vya mabasi ____
Name: _____ Language _____ Child Adult Senior/Disabled 	Jina: _____ Lugha _____ Kupitisha Watoto Watu Wazima Watu wakongwe/watu walio na Ulemavu Wataingia Bila malipo Kuanzia 




I need to buy an all-day pass.

Mimi nina haja ya kuuza cadi kupita siku.

I need to pay for a single fare.

Nina haja yakulipa Nauli moja.

Have fare/pass ready when boarding bus.

Tayarisha Nauli ao cadi ya kupita siku unapopanda basi.

I am a _____. How much for a day pass?

Mimi ni _____. Kiasi gani ya cadi ya kupita siku?

What is the fare?

Nauli ni nini?

Does this bus stop at *Main Street Station*?

Basi itakwenda usimama katika Main Street Station?

Your pass has expired. You need to pay.

Cadi ya kupita imeisha kumalizika. Yafahaa kulipa.

The cost is \$.50.

Ni gharama ya senti hamsini (\$0.50).

The cost is \$1.00.

Ni gharama ya dola moja (\$1).

The cost is \$2.00.

Ni gharama ya dola mbili (\$2).

Call RideLine for help - 354-7433

Subrecipients

VRT supports subrecipients in complying with Title VI requirements by:

1. Providing a Title VI Compliance Assessment Tool annually to the Subrecipients, using a baseline questionnaire. This tool walks subrecipients through Title VI requirements and requests appropriate documentation that is reviewed by VRT to ensure compliance. Subrecipient is notified if there are any corrective action measures that need to be done at that time.
2. VRT staff further support subrecipients in their responsibilities by conducting site reviews. During these reviews VRT staff verifies that the subrecipient's documentation supports their compliance with Title VI requirements. (Outlined in VRT's Subrecipient Monitoring and Oversight Procedures)

VRT currently has passes FTA dollars onto the following sub recipients;

- ☐ **Treasure Valley Transit** – Provides Above and Beyond paratransit services to individuals who are outside of the core fixed route service area within $\frac{3}{4}$'s of a mile on each side of a fixed route for VRT's service area in the Nampa UZA.
- ☐ **City of Nampa** – Provides capital multimodal enhancements at and near transit stops including Bicycle and Pedestrian network improvements in and around the City of Nampa in the Nampa UZA.
- ☐ **City of Middleton** – City of Middleton is designing and constructing a Park and Ride facility within Middleton's city limits with funding through a federal grant for the Nampa UZA.
- ☐ **Boise State University** – Provides fixed route services with shuttle buses within the Boise UZA. They receive federal grant funding for vehicles used to provide these services.
- ☐ **Ada County Highway District** – Through VRT's Shared Vehicle Pool, ACHD provides a Vanpool service in the Nampa/Boise UZA with federal grant funding for vehicles used to provide these services.
- ☐ **Treasure Valley YMCA** – Safe Routes to School – Safe Routes to School benefits elementary and middle school children in Grades K-8 by providing in-class education and community events including, bike/pedestrian safety classes, walk/bike challenges and others by the Safe Routes to School Coordinator.

The Title VI language of the subrecipient agreement is attached as **Attachment H**.

Non-Elected Committees and Councils

The VRT Board of Directors establishes policy and guides the strategic priorities for the agency. Board members include representatives from Ada and Canyon counties, the incorporated cities, and highway districts. In addition, there are representatives from Boise State University, the Capital City Development Corporation, the Idaho Transportation Department (ex-officio) and the Meridian Development Corporation.

The VRT Executive Board Committee is a standing committee of the full Board and it reviews matters related to budget, finance, operations, governmental, and legislative actions.

The Executive Board focuses on the internal and operational issues of the agency and works closely with the executive director in the management of Valley Regional Transit. Members are the board chair, past chair, chair elect, vice chair, treasurer, five at-large members from Ada and Canyon counties, as

well as a representative from Boise State University.

The Board and its Executive committee are made up of both elected and non-elected officials. Their work is supported by various committees and work groups described below.

Regional Advisory Council (RAC)

The RAC supports the VRT governance process by advising the Board through a forum for transportation and human service stakeholders and advocates centered on sharing information and collaborating on mobility issues. VRT staff actively tries to ensure adequate representation of diverse opinions and perspectives by soliciting participation from key human service and transit providers in the following categories:

- | | |
|------------------------------------|--|
| a. Blind/visually impaired | j. Health and Welfare |
| b. Transit consumer | k. Limited English proficiency (LEP) |
| c. Vocational/labor | l. Educational programs |
| d. Housing | m. Older adults |
| e. Non-emergency medical transport | n. Local governments |
| f. Neighborhood associations | o. Employers |
| g. Statewide coordination | p. Low income families and individuals |
| h. Urban transportation provider | q. Persons with disabilities |
| i. Rural transportation provider | r. Veterans |

VRT will continue to work with the RAC to improve representation on the council. A primary focus will be on getting Latino and refugee representation on the council. VRT and the RAC will also consider the timing and location of RAC meetings to ensure that there are not unnecessary barriers to participation.

The RAC, which meets quarterly, formulates and reviews policies, services and programs that affect groups represented on the RAC. Recommendations on policies, services and programs shall be submitted to the VRT Board for final action.

Racial Representation of Non-Elected Committees and Councils

Body	Caucasian	Latino	African American	Asian American	Native American
Regional Advisory Council	14	1	1	0	0

Service Standards

Vehicle Load

Vehicle Type	Length	Number of Vehicles	Seated	Standing	Max Load Factor
New Flyer Bus	35'	8	30	13	1.4
Goshen	20'	2	8	0	
Goshen	28'	8	8	4	
Glaval Universal	27'	5	7	10	
Glaval Universal	26'	3	18	3	
Glaval Universal	23'	2	11	5	
Starcraft	28'	2	20	8	1.4
Starcraft	23'	1	6	2	
Starcraft	25'	3	21	10	
Glaval Entourage	33'	7	28	6	
Gillig	40'	13	38	19	1.5
Gillig	35'	18	32	16	1.5
ElDorado Phoenix	28'	3	8	6	

Vehicle Headway

VRT categorizes its existing and planned service by type of service and vehicle headway or frequency. These categories help planners establish the appropriate level of service throughout the service area. The categories are as follows.

SERVICE CATEGORY	FREQUENCY	SERVICE PARAMETERS
Premium Service	15 – 30 minute all day	Dedicated right of way Limited stops
Express Service	15 – 30 minute peak 30 – 60 minute mid-day	Limited stops
Frequent Service – frequent stops	15 – 30 minute peak 30 – 60 minute mid-day	Frequent stops
Secondary Service – frequent stops	30 – 60 minute all day	Frequent stops
OnDemand Service	Based on demand – all day	Utilizes both fixed and virtual stops based on demand

The level of service categories of current routes were determined by vehicle load, population density, activity centers, previous ridership and funding availability. VRT's ValleyConnect2.0 plan, which was adopted on April 2, 2018 and the Community Planning Association of Idaho's Communities In Motion plan identify the planned service category for existing route. These plans also identify the service levels planned for new routes. These determinations were made by modeling future growth and traffic. VRT will assess vehicle headway any time the vehicle load standard has been exceeded or any time there is a change in funding availability and will use the following criteria to prioritize frequency improvements:

- 1) Current vehicle load
- 2) Current service category of the route currently compared to its planned service category
- 3) Degree the route serves low income and minority populations compared to other routes
- 4) Population level changes
- 5) Activity centers that have moved into or out of the service area
- 6) Financial implications
- 7) Service implications

On-Time Performance

VRT collects on-time performance (OTP) data on a daily basis by route, by trip and by operator, all of which is summarized and reported on monthly. If operators and/or customer comments suggest that a route is consistently late, an analysis may be performed prior to the scheduled monthly report date. On-time performance will be expressed as the ratio of trips a route is on time to the total number of trips provided (see below). A vehicle is considered on-time if it leaves a time-point no earlier than the latest published schedule, and no later than 5 minutes after the published time.

For example, over a week time period, if a route records 1000 trips with 20 late trips, then the on-time performance for that week would be calculated as follows:

$$\text{On-time performance algorithm} = \frac{(1000 - 20)}{(1000)} = 98\%$$

The criteria for defining an on-time trip as well as the algorithm used to arrive at an on-time percentage were both developed in accordance with best practice guidance as established by the American Public Transportation Association (APTA). By following the industry best practice standards, VRT is able to compare system performance to peer organization.

On-time performance metrics will be used to determine:

1. If VRT is achieving the system wide goal of achieving 90 percent on time performance.
2. If route on time performance standards (75 percent OTP) have been met

Monthly reviews of system performance and in depth route analysis will help VRT identify trends and detect problems with individual routes or trips. NOTE: Late trips due to vehicle breakdowns will not be considered in the on-time calculation

Service Availability

VRT's guideline for establishing service availability is 70% of its service based on ridership and demand and 30% of its service based on serving the transit dependent populations. VRT uses the industry standard of ¼ mile walking distance when assessing what area a route serves and how far customers can travel to a bus stop. Initial stop locations on primary, secondary and flex route services are identified using the ¼ mile walking standard. Exact stop placement may be adjusted from this target location based on destinations, passenger safety, bus safety, vehicle safety or site restrictions. Within downtown areas, the service standard is to have stops every two blocks. Stop locations on premium, express, employer express and rural services are typically park & rides and therefore are not assessed using the ¼ mile walkability standard.

Vehicle Assignment

The primary factor for vehicle assignment is ridership demand. Larger buses are assigned to routes with higher ridership and smaller buses are assigned to routes with lower demand. In most cases, a vehicle runs a route all day, so the peak period demand dictates the size of vehicle needed. Within these size categories, buses are rotated daily to different routes so that mileage and vehicle wear and tear is evenly distributed throughout the fleet. There is no consideration given to the age or condition of the vehicle when assigning it to a route. Given the relatively small size of VRT's fleet, each bus within a size category will run each route within a month's time, thereby eliminating any difference in quality of vehicle to a particular route or population. All VRT fixed route vehicles are lift equipped and bike rack equipped, so all routes and populations have equal access to these amenities. Additionally, all VRT fixed route vehicles are equipped with security cameras with audio, so no routes or passengers are provided with a lesser amount of security.

Distribution of Transit Amenities

Transit amenities for the VRT system include, but are not limited to, ADA accessible bus stops, benches, shelters, bike racks, bike lockers, transit centers, schedules, system maps, intelligent transportation systems, language proficiency measures and travel training. VRT implemented a fixed bus stop program in 2009. Prior to that, a flag-stop system was used. VRT has been working since then to implement transit amenities at fixed bus stops.

ADA Accessible Bus Stops

VRT's service standard is to provide, at a minimum, landing pads at all bus stops. Where funding and right-of-way allow, VRT will also improve sidewalks and pedestrian ramps. VRT is continuing its program to upgrade bus stops to meet ADA recommended standards. VRT conducted an analysis of all current bus stops using the following factors to prioritize which bus stops should receive ADA enhancements and to determine what enhancements to implement.

- 1) Stop usage
- 2) Number of routes serving stop
- 3) Existing condition of stop
- 4) Need to acquire right of way (ROW) to make necessary improvements
- 5) Improvements already planned by local and state jurisdictions
- 6) Density of elderly population in area
- 7) Density of low income population in area
- 8) Density of minority population in area
- 9) Nearby destinations
- 10) Walk-ability to the bus stop
- 11) Pedestrian safety concerns

Stops serving elderly, low income and minority origins and destinations were weighted higher, therefore receiving higher priority. With the completion of the study, VRT has been implementing the suggested modifications to the transit amenities at the fixed stops. . This work is being done with one time funding from the American Recovery and Reinvestment Act (ARRA). VRT will use its ongoing federal transit enhancement funds to continue this work.

Benches

The VRT service standard is to have a bench at every stop that has enough right-of-way (ROW) to allow for a bench and to meet ADA clearance requirements and there are sufficient funds to secure a bench. If the ROW is limited, ADA clearance standards take priority and a bench may not be able to be located at that stop. To expand the availability of benches, VRT contracts with an external vendor to furnish, install and maintain benches at as many feasible bus stops as possible.

The vendor installs benches where advertising has been sold first and installs benches at other feasible sites as a second priority. If a specific need is identified by drivers or customer comments, based on the stop usage or demographics of the population using a stop, VRT may request that a bench be installed at a particular stop prior to advertising being sold.

In addition to vendor installed benches, VRT works with local funding partners to improve bus stops with agency supplied benches where ridership is highest.

Shelters

The VRT service standard for shelters is to have a minimum of two (2) passengers boarding or off boarding at a stop on average each time the bus stops at that location. The number of passengers using each stop comes from the NTD survey sampling conducted by VRT on an ongoing basis. VRT currently has shelters at 51 of its 760 stops and has funding and plans to install new and replacement shelters at 13 additional existing bus stops. VRT will continue to use its ongoing federal capital enhancement funding to place shelters at qualifying stops.

Bike Racks

The VRT service standard is to have three-bike bike racks on all large buses and small fixed line buses. VRT currently has bike racks on all fixed line buses.

Schedules

The VRT service standard is to provide schedules at transit centers and at outlets throughout the region. Outlets are selected based on the location and availability of the facility to the general public. There is no charge for the schedules. Currently, VRT schedules are distributed at approximately 20 outlet locations that also sell bus passes and tickets and at 69 locations that provide bus information only. Schedule information for appropriate routes is also on the buses.

VRT posts all schedule information, including maps and times, on its website. The VRT service standard also calls for providing the schedule information in large type on the website and providing translation services upon request. Detailed routing information, including left/rights, is also provided on the website.

System Maps

System maps and the customer service number are important materials that VRT makes available at major transfer locations. **Attachment I**, is an example of the system map provided at major transfer locations.

Determination of Site Location of Facilities

Valley Regional Transit analyzes construction impacts through the Federal Environmental Impact Statement, Environmental Assessment, or Categorical Exclusion processes to assess the effects on minority and low income populations, including mitigation of impacts on businesses and households, and ensuring affected minority and low-income communities are included in decision making processes.

When constructing facilities such as vehicle storage facilities, maintenance facilities, operation centers etc., it is VRT's procedure to complete the appropriate level National Environmental Policy Act (NEPA) requirements for all such activities. Even in cases where there are no NEPA requirements, VRT will analyze the impacts of facility location to determine if any mitigating actions are appropriate or necessary. See **Attachment K** for listing of the capital infrastructure tracking, checklist, notes and VRT's internal procedures during the planning stage with regard to equity. The documents listed in **Attachment K** are available for review upon request.

In 2013 VRT completed the purchase of an existing facility in Canyon County to retro fit as maintenance, storage and operations center for the services based out of that county. The Happy Day Transit Center located at 5807 Cleveland Boulevard Caldwell.

In October of 2016 VRT opened Main Street Station. Main Street Station is a transit center where many routes come together in downtown Boise. The facility is staffed by customer service representatives who can sell passes and otherwise support transit riders. The facility also contains public restrooms and is located at 777 West Main Street, Boise.

Attachment A: Signed Annual Title VI Assurances

Certifications and Assurances

Fiscal Year 2020

FEDERAL FISCAL YEAR 2020 CERTIFICATIONS AND ASSURANCES FOR FTA ASSISTANCE PROGRAMS

(Signature pages alternate to providing Certifications and Assurances in TrAMS.)

Name of Applicant:_____

The Applicant certifies to the applicable provisions of categories 01–20. _____

Or,

The Applicant certifies to the applicable provisions of the categories it has selected:

Category	Certification
01 Certifications and Assurances Required of Every Applicant	_____
02 Public Transportation Agency Safety Plans	_____
03 Tax Liability and Felony Convictions	_____
04 Lobbying	_____
05 Private Sector Protections	_____
06 Transit Asset Management Plan	_____
07 Rolling Stock Buy America Reviews and Bus Testing	_____
08 Urbanized Area Formula Grants Program	_____
09 Formula Grants for Rural Areas	_____
10 Fixed Guideway Capital Investment Grants and the Expedited Project Delivery for Capital Investment Grants Pilot Program	_____
11 Grants for Buses and Bus Facilities and Low or No Emission Vehicle Deployment Grant Programs	_____

Attachment A: Signed Annual Title VI Assurances

Certifications and Assurances

Fiscal Year 2020

12 Enhanced Mobility of Seniors and Individuals with Disabilities Programs

13 State of Good Repair Grants

14 Infrastructure Finance Programs

15 Alcohol and Controlled Substances Testing

16 Rail Safety Training and Oversight

17 Demand Responsive Service

18 Interest and Financing Costs

19 Construction Hiring Preferences

20 Cybersecurity Certification for Rail Rolling Stock and Operations

FEDERAL FISCAL YEAR 2020 FTA CERTIFICATIONS AND ASSURANCES SIGNATURE

PAGE

(Required of all Applicants for federal assistance to be awarded by FTA in FY 2020)

AFFIRMATION OF APPLICANT

Name of the Applicant: _____

BY SIGNING BELOW, on behalf of the Applicant, I declare that it has duly authorized me to make these Certifications and Assurances and bind its compliance. Thus, it agrees to comply with all federal laws, regulations, and requirements, follow applicable federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its Authorized Representative makes to the Federal Transit Administration (FTA) in federal fiscal year 2020, irrespective of whether the individual that acted on his or her Applicant's behalf continues to represent it.

FTA intends that the Certifications and Assurances the Applicant selects on the other side of this document should apply to each Award for which it now seeks, or may later seek federal assistance to be awarded during federal fiscal year 2020.

The Applicant affirms the truthfulness and accuracy of the Certifications and Assurances it has selected in the statements submitted with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. § 3801 *et seq.*, and implementing U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR part 31, apply to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. § 1001 apply to any certification, assurance, or submission made in connection with a federal public transportation program authorized by 49 U.S.C. chapter 53 or any other statute

Attachment A: Signed Annual Title VI Assurances

Certifications and Assurances

Fiscal Year 2020

In signing this document, I declare under penalties of perjury that the foregoing Certifications and Assurances, and any other statements made by me on behalf of the Applicant are true and accurate.

Signature _____ Date: _____

Name _____ Authorized Representative of Applicant

AFFIRMATION OF APPLICANT'S ATTORNEY

For (Name of Applicant): _____

As the undersigned Attorney for the above-named Applicant, I hereby affirm to the Applicant that it has authority under state, local, or tribal government law, as applicable, to make and comply with the Certifications and Assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the Certifications and Assurances have been legally made and constitute legal and binding obligations on it.

I further affirm that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these Certifications and Assurances, or of the performance of its FTA assisted Award.

Signature _____ Date: _____

Name _____ Attorney for Applicant

Each Applicant for federal assistance to be awarded by FTA must provide an Affirmation of Applicant's Attorney pertaining to the Applicant's legal capacity. The Applicant may enter its electronic signature in lieu of the Attorney's signature within TrAMS, provided the Applicant has on file and uploaded to TrAMS this hard-copy Affirmation, signed by the attorney and dated this federal fiscal year.



Valley Regional Transit Title VI Notice to the Public

YOUR RIGHTS UNDER TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

Valley Regional Transit assures full compliance with the Title VI of the Civil Rights Act of 1964 and other nondiscrimination authorities.

Title VI provides that no person in the United States shall, on the grounds of race, color, nation origin, gender, age, disability, economic status, or limited English proficiency be excluded from participation in, or be denied the benefits of, any service, program, or activity of the ValleyRide transit and/or paratransit system.

If you have questions, concerns, complaints, or would like additional information regarding Title VI, please contact:

Valley Regional Transit
Mark Carnopis – VRT Community Relations Manager
700 NE 2nd S. Ste. 100
Meridian, ID 83642
(208) 258-2702

AMERICANS WITH DISABILITIES (ADA)

Valley Regional Transit is committed to full compliance with ADA. The ADA prohibits discrimination based on disability in admission or access to Valley Regional Transit facilities, programs, services and activities.

If you need help in order to use our services, please make your request known to the staff serving this facility. Questions, concerns, complaints or requests for additional information may be sent to the address above.



Title VI Policy Statement

Valley Regional Transit (VRT) is committed to ensuring that no individual or organization is excluded from participation in, denied the benefits of its program, activities or services, or subject to discrimination on the basis of race, color, or national origin, as stated in **Title VI of the Civil Rights Act of 1964**.

Every department, division and employee of VRT is responsible for carrying out VRT's commitment to non-discrimination, including the requirements of **Title VI**. They follow:

- To ensure that the level and quality of transportation services are provided to all;
- To identify and address, as appropriate the human health, social, economic and environmental effects of VRT's programs and activities on all populations;
- To promote full and fair participation in transportation decision making;
- To ensure meaningful access to VRT's programs and activities by persons with limited English proficiency.

VRT's Title VI Coordinator is responsible for providing leadership, direction and policy to ensure compliance with Title VI. For additional information on VRT's non discrimination obligations, please contact:

Mark Carnopis, Title VI Coordinator

700 N. East 2nd Street, Ste. 100

Meridian, Idaho, 83642

(208) 258-2702

(208) 846-8564 FAX

mcarnopis@valleyregionaltransit.org



Discrimination Complaint Procedure

1. Any person who believes that he or she, individually, as a member of any specific class, or in connection with any disadvantaged business enterprise, has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, the American with Disabilities Act of 1990, Section 504 of the Vocational Rehabilitation Act of 1973 and the Civil Rights Restoration Act of 1987, as amended, may file a complaint with the City of Lewiston. A complaint may also be filed by a representative on behalf of such a person.
2. The complaint must meet the following requirements:
 - a. Complaint shall be in writing and signed by the complainant(s). In cases where the Complainant is unable or incapable of providing a written statement, a verbal complaint may be made. If necessary, Valley Regional Transit (VRT) staff will assist the person in reducing the complaint to writing and submit the written version of the complaint to the person for signature.
 - b. Include the date of the alleged act of discrimination date when the Complainant became aware of the alleged act of discrimination; or the date on which that conduct was discontinued or the latest instance of conduct.
 - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.
 - d. Federal and state law requires complaints be filed within 180 calendar days of the alleged incident.
3. Within 10 days of receipt of the complaint, the Valley Regional Transit Community Relations Manager will determine its jurisdiction, acceptability, and/or need for additional information. The Complainant will be provided with a written acknowledgement that Valley Regional Transit has either accepted or rejected the complaint.
4. A complaint may be dismissed for the following reasons:
 - a. The Complainant requests the withdrawal of the complaint.
 - b. The Complainant fails to respond to requests for additional information needed to process the complaint.
 - c. The Complainant cannot be located after reasonable attempts.
5. Within 60 days, the VRT Community Relations Manager, Mark Carnopis, will conduct an investigation of the allegation and based on the information obtained, will render a recommendation for action in a report of findings to the VRT Executive Director, Transit Manager, Kelli Fairless. The complaint should be resolved by informal means whenever possible. Such information attempts and their results will be summarized in the report of findings.
6. Within 90 days of receipt of the complaint, the VRT Executive Director, Kelli Fairless, will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the

Attachment D: Discrimination Complaint Procedure

complainant of his/her appeal rights with the appropriate Federal or State agency, if they are dissatisfied with the final decision rendered by Valley Regional Transit.

- a. VRT will reconsider this determination if new facts come to light.
 - b. If Complainant is dissatisfied with the determination and/or resolution set forth by Valley Regional Transit, the same complaint may be submitted to the appropriate Federal or State agency for investigation.
7. Valley Regional Transit will also provide the appropriate Federal or State agency with a copy of the decision and summary of findings upon completion of the investigation within 120 days of the receipt of the complaint.
8. Contacts for the different Title VI administrative jurisdictions are as follows: Idaho

Transportation Department
Office of Civil Rights
3311 West State Street
PO Box 7129
Boise, ID 83707-1129

Federal Transit Administration
Office of Civil Rights
Attention: Complaint Team
East Building, 5th Floor – TCR
1200 New Jersey Ave., SE
Washington, DC 20590

Seattle Regional Office of FHEO
U.S. Department of Housing and Urban Development
Seattle Federal Office Building
909 First Avenue, Room 205
Seattle, Washington 98104-1000

Attachment E: Title VI Complaint Form

Valley Regional Transit Discrimination Complaint Form

Title VI of the Civil Rights Act of 1964 states "No person in the United States shall, on the ground of race, color or national origin, be excluded from, participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance".

Please provide the following information necessary in order to process your complaint. Assistance is available upon request. Complete this form and mail, Email or fax to:

Mark Carnopis, Title VI Coordinator, 700 N. East 2nd Street, Suite 100, Meridian, ID, 83642
mcarnopis@valleyregionaltransit.org FAX: 208-846-8564

1. Complainant's Name: _____

2. Address: _____

3. City: _____ State _____ Zip _____

4. Contact Number: _____ Optional Contact Number: _____

Email: _____

5. Person discriminated against (if other than Complainant)

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

6. What was the discrimination based on: (Check all that apply)

☐ Race ☐ National Origin ☐ Color

7. Date of incident resulting in discrimination: _____

8. Explain as clearly as possible what happened and how you were discriminated against. Indicate those involved. For additional space, attach additional sheets of paper or use back of this form.

9. Where did the incident take place? Please provide location, bus number, driver's name, etc.

10. Were there witnesses? Please provide their contact information.

Attachment E: Title VI Complaint Form

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Contact Number: _____ Email _____

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Contact Number: _____ Email _____

11. Did you file this complaint with another federal, state, or local agency; or with a federal or state court?

☐ Yes ☐ No

If you answered yes, check each agency complaint was filed with:

☐ Federal Agency ☐ Federal Court ☐ State Agency ☐ State Court ☐ Local Agency ☐ Other

12. Provide contact person information for the agency you also filed the complaint with:

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Telephone number: _____ Date filed: _____

Sign the complaint in the space below. You may attach any written materials or other information that supports your complaint.

Complainant's Signature

Signature Date

Filing a complaint with Valley Regional Transit is voluntary. However, without the information requested above, we may be unable to proceed with your complaint. We collect this information under authority of Title VI of the Civil Rights Act of 1964 and other civil rights statutes. We will use the information you provide to determine if we have jurisdiction, and if so, how we will process your complaint. Information submitted on this form is treated confidentially and is protected under the provisions of the Privacy Act of 1974. Names or other identifying information about individuals are disclosed when it is necessary for investigation of possible discrimination, for internal systems operations, or for routine uses, which include disclosure of information outside Valley Regional Transit for purposes associated with civil rights compliance and as permitted by law. It is illegal for a recipient of Federal financial assistance to intimidate, threaten, coerce, or discriminate or retaliate against you for filing this complaint or for taking any other action to enforce your rights under Federal civil rights laws. You are not required to use this form. You may also email or write a letter and send it to the address above.

Attachment F: Public Involvement and Notification Policy



This policy supersedes all prior policy statements written, verbal, or otherwise

Section	Policy No. 1.24.00
Policy Title: Public Involvement and Notification Policy	Page 1 of 4
Policy Date: 08/03/20, 2020	Policy Adopted: 05/19/04
Approved by VRT Chairperson: Tom Dale	Policy/Page Replaced: N/A Policy Amended: 09/20/06 Policy Amended: 07/15/09 Policy Amended: 07/13/15
Executive Director: Kelli Badesheim	Policy Amended: 08/03/20

Valley Regional Transit Public Involvement and Notification Policy

Statement of Policy

Valley Regional Transit (VRT) provides transportation services in Ada County and Canyon County. VRT will, at times, update its annual budget or propose changes to its transit system in order to improve service or maximize ridership.

Public participation is an important part of transit planning. This participation is especially crucial when significant changes to current services are proposed. Significant changes include fare increases, major service reductions or route modifications, and/or the addition of new service.

Just as important as collecting public comment prior to Board action, is informing riders and others when new transit service is either coming to or leaving a specific area. If the service is new to an area, this notification process will include information about the benefits of public transportation.

This policy provides guidance as to the types of public activities required for budget approval, fare changes, new transit service, and service that will be modified or eliminated. It also provides details about public outreach following Board approval of any changes.

Definitions

Budget – the summary of Valley Regional Transit’s revenues and planned expenditures, approved by the VRT Board, updated annually and amended bi-annually or as needed.

Attachment F: Public Involvement and Notification Policy

Fare change – any change to an existing, established fare rate or fare type applicable to regular fixed-route or paratransit service which results in a different fare-rate that is currently in effect.

Major service change - any change that would:

- add or eliminate more than twenty-five percent (25%) or more of the number of route revenue miles of a single route; or
- affect twenty-five percent (25%) or more of the number of route vehicle miles on any individual route commuted on a daily basis for the day(s) impacted by the change; or
- result in a route elimination or new route creation

Minor service change - any change in route length, frequency, route path, stop location or amenity work done to a lesser extent, or in smaller amounts, than described above as a major service change.

Modified service - recommend or required new or adjusted transit service, or modifications to the existing service, generally called major or minor service changes, but possibly limited to schedule changes or timing adjustments only.

Notice of approval – notice given after final approval by the Board regarding any budget approval, major service change, or fare changes.

Public comment – responses gathered and compiled from open houses, surveys, emailed comments, service desk reports and other outlets during interactions with the public.

Public hearing - a special type of public meeting that requires the publication and posting of a legal notice within a specified time. The main purpose of a public hearing is to provide an opportunity for the public to make comments for or against a proposal to an authorized agency representative or board member. A public hearing may be scheduled when a specific statute requires one, or when public input is desired on a sensitive or controversial issue. A public hearing is mandatory when a fare change or any major service change is proposed, or prior to the board adoption of, or changes to, the annual budget.

Public notice – Any type of notification or interaction with the public designed to increase the general knowledge of VRT processes, planned actions, or approved actions. Public notice can include any of the following:

- Open house - public forum to provide an opportunity for the public to learn and comment about a project or proposed operational changes and to solicit public comment prior to any public hearing.
- Public meeting – a meeting designed to facilitate participation in the decision-making process; assist the public in gaining an informed view of a proposed project at any level of the public transportation project development process; and gather public comment.
- Property notices – door hangers or other type of specific individual notice given to specific affected properties or individuals.

Attachment F: Public Involvement and Notification Policy

- Fliers/posters – postings generally placed on buses, at transfer locations or other public places designed to educate the public on planned VRT action.
- Mailers – targeted mailing services designed to notify all persons possibly affected by a transit route or pathway.
- Media – notices or postings placed on the various local newspaper, television, social media, websites, email or other electronic or other media VRT has access to including contracted or targeted surveys or solicited requests for input or responses.

Revenue vehicle miles – the distance traveled from the point of the first passenger pick-up to the last passenger drop-off, as long as the vehicle does not return to the dispatch point.

Route miles – the total number of miles included in a single fixed-line route or a fixed-route transit system network

Public outreach prior to Board review and approval

Budget adoption

A public hearing is required for budget adoption. The required public hearing on the proposed VRT budget or budget amendment shall be held during a regular or special meeting of the Board of Directors. Notice of any public hearing for budget adoption shall be posted at least 10 calendar days prior to the date of the board meeting.

Fare changes

A public hearing is required when a change to the fare policy is proposed. Also required are two open house/public meetings – one each in Ada County and Canyon County. Additional various media notifications, surveys and fliers/postings as determined appropriate by staff may also be included.

Major service changes

The public input process for major service changes will include public hearings in Ada County and Canyon County, a minimum of one public meeting or open house in each county, and printed and/or electronic (online) comment forms and surveys as determined appropriate by staff. Staff will provide an update to the Executive Board regarding the types of outreach planned.

Any physical infrastructure changes, including the installation of new bus stops or the removal of existing stops, will include mailers and notices to the affected property owners/businesses as well as fliers and other media as determined appropriate by staff. These notices will include information about any scheduled public hearings or meetings.

Minor service changes

Outreach efforts for minor service changes may include an open house and/or a public meeting. VRT staff will determine the level public notice during the development of any proposed changes.

Attachment F: Public Involvement and Notification Policy

Public notification following Board approval

When a new bus stop, identified through VRT technical analysis, is approved, or existing bus stops will be removed, staff will provide notices to nearby property owners and businesses. These notices will be issued no later than two weeks before the change. VRT staff will conduct follow-up visits upon request with adjacent property owners as needed. This will ensure the public is provided with the technical rationale and methodology used. The notices will also provide both a timeline for installation of the bus stop any amenities or enhancements (e.g. benches or shelters), and information about how to contact VRT if there are any issues with the bus stop.

Responses to public comment

Staff will respond to all comments and feedback with the documented technical reasons and rationale for the changes in question. Technical reasons for changes may include regulations or procurement rules affecting the course of the budget, established policy regarding bus stop placement or amenities or rationale regarding the course and timing of an adjusted route. Comments will always require a response stating the reason and method chosen for the change. Technical rationale or established policy will be followed unless staff are directed otherwise by the VRT Board.



Valley Regional Transit
Limited English Proficiency (LEP) Plan

Updated:
November 2020

Attachment G: Limited English Proficiency (LEP) Plan

I. Introduction

This *Limited English Proficiency Plan (LEP)* has been prepared to address Valley Regional Transit's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled *Improving Access to Services for Persons with Limited English Proficiency*, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds.

II. Plan Summary

Valley Regional Transit has developed this *Limited English Proficiency Plan* to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available

In order to prepare this plan, Valley Regional Transit used the four-factor LEP analysis, which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served by Valley Regional Transit.
2. The frequency with which LEP persons come in contact with Valley Regional Transit services.
3. The nature and importance of services provided by Valley Regional Transit to the LEP population.
4. The interpretation services available to Valley Regional Transit and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

Attachment G: Limited English Proficiency (LEP) Plan

III. Meaningful Access: Four-Factor Analysis

Factor 1: The number or proportion of LEP persons in the service area who may be served by Valley Regional Transit.

Valley Regional Transit (VRT) is the regional public transportation authority for Ada and Canyon counties in southwest Idaho. VRT's main responsibilities are to coordinate transit services in the two-county area and develop and implement a regional public transportation system. VRT owns the ValleyRide bus system, but contracts with private transportation firms to manage fixed-route bus services for Boise/Garden City and Nampa/Caldwell, inter county service between Ada and Canyon counties, and ACCESS paratransit service.

VRT examined data from the “Languages spoken at home and ability to speak English in the United States,” data set in the 2011-2015 American Community Survey Estimates. Data was reviewed from both Ada County and Canyon County, covering the expanse of Valley Regional Transit’s service area. Approximately 3% (12,769) of Ada County total population 5 years of age or older (390,758) indicated they do not speak English “very well.” In Canyon County, 7% (12,128) of the total population (182,840) indicated they do not speak English “very well.”

A breakdown of the languages spoken in Ada and Canyon County’s population who indicated “they speak English less than well”, is provided in Table 1.

Table 1 Ada and Canyon County Populations indicating they speak English “less than very well”

Language	Ada County	Canyon County	Combined
Spanish or Spanish Creole	5,225	12,768	17,993
Other Indo-European languages	2,382	612	2,994
Asian and Pacific Island languages	3,247	425	3,672
Other languages	1,530	150	1,680
Total Population that do not speak English “very well”	12,384	13,955	26,339
Total Population	419,473	198,845	615,318
Percent Population that do not speak English “very well”	3%	7%	4%

Source: 2018 American Community Survey 5-Year Estimates

In VRT’s two-county service area, Spanish/Spanish Creole is the language category with the highest representation. The size of the Spanish or Spanish Creole population suggests that this group would have the highest probability to encounter language difficulties within the VRT system. These challenges are especially apparent on the Canyon County system. However, in Ada County, special considerations need to be made for other Indo-European languages, Asian and Pacific Island languages and a collection of other languages. Ada County also includes a considerable amount of other language groups who indicate they “speak English less than very well.”

Attachment G: Limited English Proficiency (LEP) Plan

Language groups beyond Spanish and Spanish Creole can be attributed in large part to the growing refugee populations in Ada County and across Idaho. Since 2001, Idaho has resettled 11,746 refugees, according to the Refugee Processing Center. Idaho has two refugee resettlement cities. The first is Boise, located in Ada County, and the second is Twin Falls, located in Magic Valley. Boise is in VRT's service area and resettles roughly 70%, or around 700, of the refugees coming to Idaho each year. According to Idaho Health and Welfare, between May 2009 and May 2010 new arrivals spoke a total of 37 different languages. However, there are typically clusters resettled from a certain origin countries. The table below shows the major languages spoken by arriving refugees for the years of 2010, 2011, 2014, 2015 and 2018.

Languages	2010	2011	2014	2015	2018
Kinyarwanda/Swahili		10%	16%	26%	28%
Kurdish/Arabic	23%	15%	29%	13%	12%
Karen/Kayah/Burmese	5%	25%	12%	11%	0.5%
Somali			15%	9%	
Dari/Persian/Farsi	5%		3%	9%	2%
Nepali	32%	50%	12%	4%	4%
Kunama			2%	8%	
Bembe					22%
Kinyabwisha					6

Sources: Idaho Health and Welfare: Idaho Office for Refugees PowerPoint, U.S. Department of Health & Human Services Office of Refugee Resettlement: Refugee Arrivals 2011, 2014, and 2015, Idaho Office for Refugees Idaho Refugee Languages 2018

Over the last twenty years there are six main languages spoken by refugees in Idaho. Those languages are Kinyarwanda/Swahili, Kurdish/Arabic, Karen/Kayah/Burmese, Somali, Dari/Persian/Farsi, Nepali, and Kunama. Provided below is the count of the top six countries of which new refugees have been resettled since October 1, 2000 in Idaho and their country of origin.

	Language	Country of Origin	Number of Individuals	Percent of Total
Number of Refugees resettled in Idaho from October 1, 2000 to September 30, 2019	French, Kituba, Lingala	Congo (Former Zaire)	2,446	20.95%
	Kurdish/Arabic	Iraq	1,675	14.35%
	Nepali	Bhutan	1,303	11.16%
	Burmese	Burma	886	7.59%
	Pashto, Farsi	Afghanistan	797	6.83%
	Somali	Somalia	759	6.50%
	Uzbek, Russian	Uzbekistan	646	5.53%

Source: Idaho Office of Refugees FY2001-FY2019 Count

Attachment G: Limited English Proficiency (LEP) Plan

VRT has not had the opportunity to assess the English language levels of this population or data of their participation in VRT services. However, conversations with Bus Drivers and Customer Service agents suggest these groups make up the majority of other language groups collected in the 2014 onboard survey provided below.

In 2014 an onboard survey was conducted on Valley Ride services with the goal of providing a comprehensive overview of the current customers travel behavior and attitudes. The survey also collected data on the socioeconomic profile of riders on several different Valley Ride services. Riders were asked a variety of demographic questions in order to compare these characteristics with those of the general population. The language related findings from this survey are provided on the next page.

		Ada County	Inter County	Canyon County	All Respondents
Language	English Only	88.6%	80.4%	88.1%	87.1%
	Spanish/Creole Only	2.2%	2.8%	3.0%	2.7%
	Some other language	2.4%	1.9%		2.3%
	English and another language	6.8%	15.0%	9.0%	7.9%

Source: COMPASS 2014 Regional Transportation Survey ValleyRide On-board Survey of Riders

Consistent with the distribution of Spanish speaking residents in Canyon County, there appears to be a slight increase in the proportion of Canyon County riders who speak Spanish in comparison with the overall ridership population. The inter-county service has almost twice as many riders who speak “English and another language.” The increased volume of bi-lingual riders could be attributed to the large student populations that use the system to reach Boise State University and the College of Western Idaho.

Factor 2: The frequency with which LEP individuals come into contact with your programs, activities, and services

VRT assesses the frequency at which customer service representatives are requested to provide language supports. Customers calling into VRT Customer Service are provided with an option to select Spanish to navigate through the Customer Service phone tree. Data collected from October 2019 – October 2020 indicated that 295 customers selected this option. Using an estimate of approximately 25 Spanish line requests per month, Customer Service expects to receive 300 Spanish call requests in 2021.

Attachment G: Limited English Proficiency (LEP) Plan

Additionally, Customer Service staff has access to Language Line, an over the phone interpreting service available 24 hours a day. This service is made available to all VRT customer service agents, but is rarely used. Customer service staff estimates that this service is only used 2-3 times per year. Bus drivers can make this resource available to riders by providing a pamphlet detailing the various available languages.

VRT staff has not yet had the opportunity to consult directly with LEP persons, regarding the impact of this program.

Factor 3: The importance to LEP persons of your program, activities, and services

Valley Regional Transit's most critical service is the ability to access public transportation and the ability to comment on any service changes when they are proposed. The largest geographic concentration of LEP individuals in the VRT service area is Spanish. Services provided by VRT that are most likely to encounter LEP individuals are the fixed-route system, which serves the general public, the ACCESS paratransit service, which services primarily seniors and persons with disabilities, and the GoRide Job Access service. It is also likely that VRT will encounter LEP individuals at community outreach events.

Factor 4: The resources available to the recipient and costs

As mentioned in Factor 2, VRT Customer Service has a Spanish speaking staff person, providing direct assistance to LEP customers in need of assistance. The availability of this option is included in the VRT Customer Service phone tree. In addition, there is one Valley Regional Transit staff person who speaks Spanish fluently and can assist with translation issues on an as-needed basis.

Additionally, for language needs beyond Spanish, Language Line can easily be made available, as drivers are trained to identify rider language interpretation needs and work with VRT customer service (via Language Line) to provide translation services.

With the increase of services and facilities that have been implemented in Canyon County, the need for LEP services in the area increased. VRT has hired an individual who rotates around to all facilities, helping to cover the need for LEP services and has added a dedicated Customer Service line for Spanish speaking customers.

Ada and Canyon counties currently have thousands of refugees who have resettled in the area. Many of these refugees rely heavily on our public transportation system. These refugees speak more than a dozen different languages.

Valley Regional Transit has worked with the English Language Center in Boise to provide training on using our transit system. VRT staff also has assisted other refugee agencies including the Agency for new Americans, the International Resource Committee, and World Relief. We will continue to work with these agencies on an as-requested basis.

III. LANGUAGE ASSISTANCE

Attachment G: Limited English Proficiency (LEP) Plan

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to Valley Regional Transit services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

How the Valley Regional Transit staff may identify an LEP person who needs language assistance:

- Post notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- ValleyRide bus services staff are provided with a Language Line brochure that allows the person seeking interpretation assistance to identify the primary language he or she speaks. Once the language spoken is identified, ValleyRide operations staff works with VRT customer service staff to utilize Language Line services.
- Germane VRT staff and operations staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
- When Valley Regional Transit either sponsors or participates in an informational meeting or event, a staff person may greet participants as they arrive. By informally engaging participants in conversation, it is possible to gauge each attendee's ability to speak and understand English. Although translation may not be able to be provided at the event it will help identify the need for future events.

IV. STAFF TRAINING

The following training will be provided to all staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of the Language Line brochure and telephone interpretation service.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.

All contractors or subcontractors performing work for Valley Regional Transit will be required to follow the Title VI/LEP guidelines.

V. TRANSLATION OF DOCUMENTS

Valley Regional Transit translates vital including fare information and “how to ride” brochures into Spanish and Chinese. In addition, Valley Regional Transit will consider translation of project documents, meeting notices, flyers and agendas when the target audience is expected to include LEP individuals.

Attachment G: Limited English Proficiency (LEP) Plan

VI. MONITORING

Monitoring and Updating the LEP Plan

Valley Regional Transit will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated every two years with the American Community Survey updates, or when it is clear that higher concentrations of LEP individuals are present in the VRT service area.

Updates will include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether Valley Regional Transit's financial resources are sufficient to fund language assistance resources needed.
- Determine whether Valley Regional Transit fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.

VII. DISSEMINATION OF THE VALLEY REGIONALTRANSIT LEP PLAN

- Post the LEP plan on Valley Regional Transit's website at www.valleyregionaltransit.org.
- State on agendas and public notices in the language that LEP persons would understand that documents may be made available in that language upon request.

Attachment H: Subrecipient Title VI Compliance Assessment Tool

Sub-recipient Title VI Compliance Assessment Tool

49 Code of Federal Regulations (CFR) Part 21 requires that the Valley Regional Transit (VRT) conduct periodic reviews of cities, counties, planning agencies and other recipients of federal-transit funds to ensure they are complying with Title VI of the Civil Rights Act of 1964. Title VI states that “no person in the United States shall be excluded from participation, denied the benefits of, or be subjected to discrimination in any Federally-funded program, policy or activity on the basis of race, color or national origin.” (42 U.S.C.2000d)

VRT has developed this assessment as a means of determining sub-recipient compliance; helping sub-recipients understand their Title VI responsibilities; and assisting VRT in planning future training and technical assistance.

This assessment is part of VRT's Quality Assurance Review (QAR) process and has been designed to take only a few minutes of your time. Please fax, mail or email the completed questionnaire no later than 00/00/0000 with attachments to:

Mark Carnopis, VRT Title VI Coordinator,
VRT, 700 NE 2nd Street, Suite 100,
Meridian, ID 83642
mcarnopis@valleyregionaltransit.org

Questions or concerns may be e-mailed to mcarnopis@valleyregionaltransit.org or you may reach Mr. Carnopis by phone at 208-258-2702.

Baseline Questionnaire

1. Who is the Title VI contact person for your agency? Does this person accept complaints from the public? If not, who does? Please include title, email and telephone number for each person listed.

--

2. In the past three years, has your agency been named in a discrimination complaint or lawsuit? If so, when and what was the nature of the complaint or lawsuit and the outcome?

--

3. Does your agency have a written discrimination complaint process? If so, please provide a copy as an attachment.

--

4. Has your agency made the public aware of the right to file a complaint? If so, by what mechanism? Provide as attachment.

--

5. Does your agency provide free translation services for persons with Limited English Proficiency (LEP)? Explain.

--

Attachment H: Subrecipient Title VI Compliance Assessment Tool

6. In the past twelve months, what has your agency done to receive and consider input from all citizen groups, especially minority, low income, disabled and transit-dependent? Provide attachment, if applicable

--

7. Does your agency have a method to collect racial and ethnic data on citizens impacted by your projects? If so, please describe.

--

8. Has your agency provided written Title VI Assurances to VRT? Please attach a copy.

--

9. Does your agency include the required DBE assurance language at 49 CFR 26.13 (a) and (b) verbatim in all financial agreements, contracts and subcontracts? (Please see DBE assurance language below)

--

26.13 What assurances must recipients and contractors make?

(a) Each financial assistance agreement you sign with a DOT operating administration (or a primary recipient) must include the following assurance:

The recipient shall not discriminate on the basis of race, color, national origin, or sex in the award and performance of any DOT-assisted contract or in the administration of its DBE program or the requirements of 49 CFR part 26. The recipient shall take all necessary and reasonable steps under 49 CFR part 26 to ensure nondiscrimination in the award and administration of DOT-assisted contracts. The recipient's DBE program, as required by 49 CFR part 26 and as approved by DOT, is incorporated by reference in this agreement.

Implementation of this program is a legal obligation and failure to carry out its terms shall be treated as a violation of this agreement. Upon notification to the recipient of its failure to carry out its approved program, the Department may impose sanctions as provided for under part 26 and may, in appropriate cases, refer the matter for enforcement under 18 U.S.C. 1001 and/or the Program Fraud Civil Remedies Act of 1986 (31 U.S.C. 3801 et seq.).

Attachment H: Subrecipient Title VI Compliance Assessment Tool

(b) Each contract you sign with a contractor (and each subcontract the prime contractor signs with a subcontractor) must include the following assurance:

The contractor, sub recipient or subcontractor shall not discriminate on the basis of race, color, national origin, or sex in the performance of this contract. The contractor shall carry out applicable requirements of 49 CFR part 26 in the award and administration of DOT-assisted contracts. Failure by the contractor to carry out these requirements is a material breach of this contract, which may result in the termination of this contract or such other remedy as the recipient deems appropriate.

10. Does your agency physically include the Civil Rights Special Provisions (42 U.S.C. 12132) in all contracts and ensure they are included in all sub-contracts, including the third-tier?

11. Does your agency monitor DBEs on construction projects to ensure they are performing a commercially useful function (CUF)? If so, where is this documented? If a DBE is not performing a CUF, what actions or steps have you taken? Who do you notify?

12. Name of your Agency:

13. Number of full-time and part-time employees:

14. Do you have any questions regarding this assessment or Title VI? Please include them here along with your email address or phone number and an VRT representative will respond.

15. Would your agency like Title VI training or other Civil Rights technical assistance from VRT? If yes, please explain. Does your agency have teleconferencing ability?

Attachment H: Subrecipient Title VI Compliance Assessment Tool

16. Please provide the Name, Title and contact information of the person who completed this baseline assessment.

17. Please list each attachment provided with the assessment.

2016

VRT Subrecipient / Contractor Monitoring and Oversight



Valley Regional Transit

8/15/2016

Subrecipient Monitoring and Oversight

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Contract Monitoring and Oversight Follows this section

Purpose

The purpose of these Subrecipient Monitoring and Oversight Procedures is to:

- Ensure that all program requirements are met by subrecipients, including civil rights
- Monitor compliance with FTA requirements for FTA-funded vehicles or facilities that are maintained by subrecipients, leased to service providers, or maintained under contract by other than the Valley Regional Transit employees
- Identify and address performance issues in a timely manner
- Track information regarding performance quality Ensure that all construction is performed in accordance with the design intent agreed upon in the original contract or through an approved change order or modification.
- Monitor and address subrecipient performance in civil rights, maintenance, and drug and alcohol programs

These procedures explain methods of monitoring, persons responsible, frequency, and expected deliverables associated with managing performance and compliance monitoring systems for rolling stock, construction, ADA paratransit, and fixed route services.

Scope and Applicability

This Procedure applies to monitoring performance and compliance for the following types of projects/programs:

- Rolling Stock
- Construction
- ADA Paratransit, and/or Fixed Route, Services

The frequency and type of monitoring will be based upon the following: a) size of the grant or contract, b) associated risks, c) service complexity, and d) type of grant or contract.

References to Legislative and Regulatory Documents

- FTA Circular 4220.1F, "Third Party Contracting Guidance"
- 49 CFR Part 18
- 2 CFR 200
- FAST Act

Subrecipient Monitoring and Oversight Procedures

The procedures listed below pertain to Valley Regional Transit's oversight and monitoring of federal requirements to subrecipients. These procedures are based and in compliance with Circulars FTA C 5010.1e and FTA C9030.1E (updated 1/16/2014).

VRT currently, has the following active subrecipients:

- Ada County Highway District (ACHD)
- City of Nampa
- Boise State University (BSU)
- Treasure Valley YMCA

- Treasure Valley Transit –
- City of Middleton- project has not started as of 8/23/2016
- College of Western Idaho – project has not started as of 8/23/2016

Monitoring Process

The monitoring process incorporates the full cycle of grants for subrecipient monitoring. The approach emphasizes both advising the subrecipient of their responsibilities and assessing compliance.

The subrecipient monitoring process will consist of the following activities:

1. Elaboration of FTA Requirements and Subrecipient Guidelines
2. FTA Subrecipient Funding Agreement Execution
3. Ongoing FTA subrecipient monitoring including monthly invoice reviews and review of quarterly reporting requirements
4. Formal compliance reviews – desk and on site
5. Closeout

The specific tasks and responsibilities for each of these activities are noted below. The frequency of the different activities depends on the identified risk level (low, medium, or high).

Monitoring Process Step		Low	Medium	High
1	Subrecipient Identification and Initial Monitoring Needs Assessment	All Subrecipients	All Subrecipients	All Subrecipients
2	Elaboration of FTA Requirements and Subrecipient Guidelines	All Subrecipients	All Subrecipients	All Subrecipients
3	FTA Subrecipient Funding Agreement Execution	All Subrecipients	All Subrecipients	All Subrecipients
4	Ongoing FTA Subrecipient Monitoring, including: 4.1 Invoice reviews	Monthly	Monthly	Monthly
	4.2 Quarterly Reporting Requirements	Quarterly	Quarterly	Quarterly
5	Formal Compliance Reviews 5.1 Desk review of submitted documents	Annual Review only policies and procedures that have changed	Annual Review only policies and procedures that have changed	Annual Review only policies and procedures that have changed
	5.2 On Site Review	Every 24 months	Every 18 months	Every 12 months
	5.3 Compliance Review Report	Modified version for desk top, full for on site	Modified version for desk top, full for on site	Modified version for desk top, full for on site
	5.4 Corrective Action Monitoring	Where necessary	Where necessary	Where necessary
6	Closeout	All Subrecipients at end of project	All Subrecipients at end of project	All Subrecipients at end of project

A template for determining risk is below; high scores correspond to high risk subrecipients:

Risk Assessment Questionnaire Template

I. GENERAL ASSESSMENT	
1. Subrecipient experience with State or Federal Funds:	
	Risk Factor
5+ years	1
3-5 years	3
0-3 years	5
Comments:	
2. Subrecipient experience with specific Grant program:	
	Risk Factor
5+ years	1
3-5 years	3
0-3 years	5
Comments:	
3. Management or staff turnover or reorganization that affects this program:	
	Risk Factor

No turnover or reorganization	1
Little turnover or reorganization	3
Significant turnover or reorganization	5
Comments:	
4. Experience of staff and management assigned to the program:	
	Risk Factor
5+ years/funding cycles	1
2-5 years/funding cycles	3
Less than 2 years/funding cycles	5
Comments:	
5. Subrecipient timeliness in document submission:	
Applications	
Amendments	
Fiscal or Financial Reporting	
Budgets/Revisions	
Close-out	
Single audits and corrective action (if applicable)	
	Risk Factor
On time submission of all documents	1
Rarely late or sometimes late on some documents	3

Consistently late on some or all documents	5
Comments:	
6. Subrecipient timely response to program/fiscal questions:	
	Risk Factor
Always timely in response	1
Sometimes late in response	3
Consistently late in response	5
Comments:	
7. Complexity of the business environment or program funding/matching requirements:	
	Risk Factor
Simple program requirements and operations environment	1
Moderately complex program requirements and operations environment	3
Complex operations environment and program requirements	5
Comments:	
8. Effective written procedures and controls for this program:	
	Risk Factor
Formal/Written and Distributed to Employees	1
Informal Policies and Controls	3
No Policies or Controls	5

The sequencing of the Formal Compliance Reviews will depend on a number of factors:

1. The level of monitoring need – High scoring projects should be prioritized within the Subrecipient Monitoring plan.

2. The duration of the sub grant or funding – Some sub grants may last less than a year. Where possible, oversight through a desk review should occur either during the grant agreement process or within the first quarter of the sub grant performance to allow sufficient time for corrective actions to be closed before the funding ends.

Elaboration of FTA Requirements and Subrecipient Guidelines

The Grants Administrator will advise subrecipients of federal award information and compliance requirements prior to awarding or allocating FTA funds. This ensures that potential subrecipients understand the process and requirements before accepting an award of FTA fund. The information should include the following:

- CFDA title and number, award name, award number, and award year.
- 2 CFR 200

- Requirements imposed by Federal laws, regulations, and the provisions of contracts or grant agreements as well as any supplemental requirements imposed by FTA
- Applicable oversight areas
- Invoice submission requirements
- Oversight and monitoring documentation requirements

Subrecipient Funding Agreement Execution

FTA requirements will be stated in the agreement along with the monitoring plans. At the time of agreement execution, the subrecipient will agree to comply with all of the applicable FTA requirements and to be subject to ongoing monitoring by Valley Regional Transit as described herein.

Valley Regional Transit will maintain all pertinent information about each subrecipient including contact information, source and amount of funds, and summary project information for inclusion into required FTA reports. All relevant information relating to the oversight of each FTA subrecipient should be maintained in such manner as to be easily and quickly identified, complete, and readily available for use.

Subrecipient Compliance Monitoring:

When federally-funded services, rolling stock, and facilities are operated by a subrecipient or public entity other than Valley Regional Transit they must be subject to regular reviews by Valley Regional Transit to ensure compliance with FTA requirements.

Monitoring activities will include reviewing and approving subrecipient invoices for reimbursement, developing project status information for inclusion in the quarterly Milestone Progress Report and Federal Financial Report, conducting formal on-site compliance reviews, and managing closeout activities.

i) Invoice Reviews

The assigned project manager will review all FTA subrecipient requests for reimbursement. This will ensure all required supporting documents are submitted and that all requests are eligible for reimbursement using FTA funds.

Once reviewed and approved invoice requests will be sent by the project manager to Finance for payment processing.

Supporting Documentation Required

- Detailed Project Description
- Invoice
- Vendor/Contract Invoices
- Cancelled Checks or Proof of Payment with Payment Date for Capital Items
- Operating costs from Ledger in Financial system

ii) Quarterly Reporting

The project manager will review program progress on a quarterly basis. The completed report will include the following areas and will be reviewed by the grants administrator, who will clarify any information with the subrecipient if necessary. The grants administrator will also ensure that this information is included in quarterly reports to FTA.

Examples of Items to Include in Quarterly Report

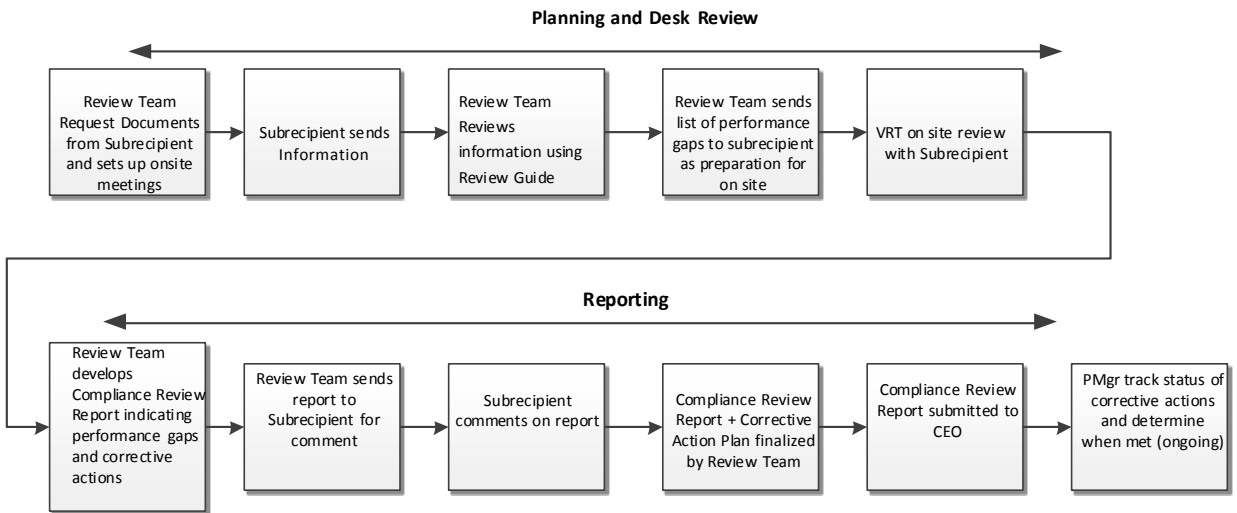
- Project Schedule including original and current completion dates
- Funding table for each ALI including fiscal year, original planned allocation, current estimates, actual expenditures, and remaining allocation
- Corrective Action Plan including updates for any delayed projects

Formal Compliance Reviews

All FTA subrecipients shall receive a desk top review annually and a formal on-site compliance review a minimum of once every 24 months using this Subrecipient Review Guide. The Site visit review frequency will be based on the level of monitoring needed for each subrecipient or sub grant and attributable risks as determined by Valley Regional Transit Grants and Project Management staff.

These reviews will consist of the following activities:

- i. Desk Review of Submitted Documents
- ii. On-Site Review
- iii. Compliance Review Report
- iv. Corrective Action Monitoring



All FTA subrecipients will be assessed in the areas of financial management, financial capacity, technical capacity, satisfactory continuing control, Title VI, procurement, drug free workplace, planning/ program of projects and DBE for compliance with FTA requirements. In some cases, one or more areas may not be applicable to the subrecipient, so do not require consideration. The remaining areas to be reviewed will be based on the size and natures of services of the grant, service complexity, and type of sub grant as indicated in the following chart:

Compliance Area	Capital Projects	Transit	Planning	Bus and Bus Facilities
Financial Management and Capacity	All subrecipients	All subrecipients	All subrecipients	All subrecipients
Legal	All subrecipients	All subrecipients	All subrecipients	All subrecipients
Technical Capacity	All subrecipients	All subrecipients	All subrecipients	All subrecipients
Satisfactory Continuing Control	All subrecipients	All subrecipients	All subrecipients	All subrecipients
Title VI	All subrecipients	All subrecipients	All subrecipients	All subrecipients
Procurement	All subrecipients	All subrecipients	All subrecipients	All subrecipients
DBE	All subrecipients with over \$250K in FTA contracting opportunities	All subrecipients with over \$250K in FTA contracting opportunities	All subrecipients with over \$250K in FTA contracting opportunities	All subrecipients with over \$250K in FTA contracting opportunities
Maintenance	All subrecipients with FTA funded facilities	All Subrecipients with FTA funded rolling stock or FTA funded facilities	All subrecipients with FTA funded facilities	All Subrecipients with FTA funded rolling stock or FTA funded facilities
ADA	All subrecipients with FTA funded facilities	All subrecipients operating fixed route services		All subrecipients operating fixed route or demand response
Half Fare		All subrecipients operating fixed route services		All subrecipients operating fixed route services
Charter Bus		All subrecipients operating Charter services		All subrecipients operating Charter services
School Bus		All subrecipients operating School bus services		All subrecipients operating School bus services
Drug free workplace and drug and alcohol program	All subrecipients with safety sensitive employees	All subrecipients with safety sensitive employees	Drug free workplace	All subrecipients with safety sensitive employees

Compliance Area	Capital Projects	Transit	Planning	Bus and Bus Facilities
EEO	All subrecipients with 50 or more transit related employees and either requests or received in excess of \$1M in capital and/or operating assistance or requests or receives in excess of \$250K in planning assistance.	All subrecipients with 50 or more transit related employees and either requests or received in excess of \$1M in capital and/or operating assistance or requests or receives in excess of \$250K in planning assistance.	All subrecipients with 50 or more transit related employees and either requests or received in excess of \$1M in capital and/or operating assistance or requests or receives in excess of \$250K in planning assistance.	All subrecipients with 50 or more transit related employees and either requests or received in excess of \$1M in capital and/or operating assistance or requests or receives in excess of \$250K in planning assistance.
Public Comment		All subrecipients operating fixed route services		All subrecipients that have potential for changes
Planning/Program of Projects	All subrecipients	All subrecipients	All subrecipients	All subrecipients

Subrecipients will be reviewed against the FTA requirements for each area as outlined in the table below.

Compliance Area	Basic Requirement (based on 2014 Triennial Review Guidance)
Financial Management and Financial Capacity	The subrecipient must demonstrate the ability to match and manage FTA grant funds, cover cost increases and operating deficits, cover maintenance and operational costs for FTA funded facilities and equipment, as well as conduct and respond to applicable audits.
Legal	The subrecipient must comply with restrictions on lobbying requirements
Technical Capacity	The subrecipient must be able to implement FTA funded projects in accordance with the grant application, Master Agreement, and all applicable laws and regulations, using sound management practices.
Satisfactory Continuing Control	The subrecipient must ensure that FTA-funded property will remain available to be used for its originally authorized purpose throughout its useful life until disposition.
Title VI	The subrecipient must ensure that no person shall, on the grounds of race, color, or national origin, be excluded from participating in, or be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance without regard to whether specific projects or services are federally funded. The subrecipient must ensure that federally supported transit services and related benefits are distributed in an equitable manner.
Procurement	Subrecipients use their own procurement procedures that reflect applicable state and local laws and regulations, provided that the process ensures competitive procurement and the procedures conform to applicable federal law, including 49 CFR Part 18 (specifically Section 18.36) and FTA Circular 4220.1F, "Third Party Contracting Guidance."
DBE	The subrecipient must comply with 49 CFR Part 26 to ensure nondiscrimination in the award and administration of DOT-assisted contracts. Subrecipients also must create a level playing field on which DBEs can compete fairly for DOT-assisted contracts.

Maintenance	Subrecipients must keep federally funded vehicles, equipment, and facilities in good operating condition. Subrecipients must keep ADA accessibility features on all vehicles, equipment and facilities in good operating order.
ADA	Titles II and III of the Americans with Disabilities Act of 1990 (ADA) provide that no entity shall discriminate against an individual with a disability in connection with the provision of transportation service. The law sets forth specific requirements for vehicle and facility accessibility and the provision of service, including complementary paratransit service.
Half Fare	For fixed route service supported with Section 5307 assistance, fares charged elderly persons, persons with disabilities or an individual presenting a Medicare card during off peak hours will not be more than one half the peak hour fares.
Charter Bus	Subrecipients are prohibited from using federally funded equipment and facilities to provide charter service if a registered private charter operator expresses interest in providing the service. Subrecipients are allowed to operate community based charter services excepted under the regulations.
School Bus	Subrecipients are prohibited from providing exclusive school bus service unless the service qualifies and is approved by the FTA Administrator under an allowable exemption. Federally funded equipment or facilities cannot be used to provide exclusive school bus service. School tripper service that operates and looks like all other regular service is allowed.
Drug free workplace and Drug and Alcohol Program	Drug free workplace: All subrecipients are required to maintain a drug-free workplace for all employees and to have an ongoing drug-free awareness program. Drug and Alcohol Program: Subrecipients receiving Section 5307, 5309 or 5311 funds that have safety-sensitive employees must have a drug and alcohol testing program in place for such employees.
EEO	The subrecipient must ensure that no person in the United States shall on the grounds of race, color, religion, national origin, sex, age, or disability be excluded from participating in, or denied the benefits of, or be subject to discrimination in employment under any project, program, or activity receiving federal financial assistance under the federal transit laws. (Note: EEOC's regulation only identifies/recognizes religion and not creed as one of the protected groups.)
Public Comment	Section 5307 subrecipients are expected to have a written, locally developed process for soliciting and considering public comment before raising a fare or carrying out a major transportation service reduction.
Planning/Program of Projects	Planning: The subrecipient must participate in the transportation planning process in accordance with FTA requirements, FAST ACT/MAP-21, and the metropolitan and statewide planning regulations. Human services transportation: Subrecipients must participate in a coordinated public transit-human services transportation planning process that identifies the 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. Program of Projects (POP): Each recipient of a Section 5307 grant shall develop, publish, afford an opportunity for a public hearing on, and submit for approval, a POP.

Formal Compliance Reviews will be undertaken by a Review Team.

The Review team members will vary between subrecipients depending in the type of project, and the level of monitoring needed, to ensure that members from the relevant departments and in- house experts are engaged appropriately.

A review team would consist of:

- Grants Manager
- Project Manager
- Other internal subject matter or compliance experts as required

i) Review of Submitted Documents

Annual

A desk review will be undertaken bi-annually for all projects by the Review Team.

The first desk review should assess all documentation. Thereafter only new or amended policies and procedures need to be reviewed. For FTA subrecipients with medium or high monitoring requirements, or those whose funded project lasts less than a year, the first review might occur before, or within the first Quarter after execution of the subrecipient funding agreement. For all others the first desk review would be within the first year of the funding agreement.

The level of detail will depend on the determined monitoring needed for the subrecipient. For subrecipients with low levels of monitoring needed, only new or amended policies and procedures need to be reviewed. For all other subrecipients, all policies and procedures should be reviewed.

The steps are outlined below:

- o **Information Request:** The Review Team will request the relevant documents from subrecipients. A draft letter requesting information can be found in Appendix B. The Subrecipient should be given 2-3 weeks to collect and submit the required documents.
- o **Documentation Review:** The Review team will review the documentation.
Additional documentation or clarification requests may be required.
- o **Compliance Review Report:** The Compliance Review Report will be drafted by the Review Team Leader based on the findings, including any corrective actions required.

Before On-site Review

- o **Information Request:** The Review Team will request relevant documentation at least 4 weeks in advance of the site visit based on the requirements. The Compliance Review Document List indicates the relevant documents for each area. The requested documents will be determined by the review areas applicable to each subrecipient. A draft letter requesting the information can be found in Appendix C. The Subrecipient should be asked to return the documents at least 2 weeks before the site visit to allow time for review.

- **Review Documentation:** The Review Team will review all submitted documents. The team will record which documents were received and if there were performance or information gaps in meeting the FTA requirements in each area.
- **Pre-visit information:** At least 1 week before the site visit the Review Team should send the Subrecipient the following:
 - Cover Letter (Appendix D)
 - Subrecipient Review areas. This outlines the documents that were received and areas that will be further investigated onsite, and a list of performance or information gaps in advance of the site visit, allowing the subrecipient to prepare for onsite discussions
 - The program for the on-site review to ensure that all relevant staff members are present
 - The chosen sample of procurement files, so that the Subrecipient will ensure all the documentation is ready (if applicable) for review on site.

ii) On-Site Review

The Review Team will coordinate the on-site reviews. It is expected that 2-3 staff would attend onsite to conduct the review based on the results of the desk review. The Review team will choose the individuals that attend each review separately, based on the skills and expertise required for that subrecipient or project. For example, an ADA subject matter expert might attend if the desk review showed missing ADA information or issues regarding ADA requirements.

The on-site reviews will concentrate on performance gaps identified during the pre-site visit documentation review, changes in policies and procedures, risk based assessment of grant management areas, and federally funded procurements.

The on-site reviews will last approximately 1.5 days and will cover the following activities:

- **Entrance Conference** – the first meeting of the site visit between the Review team and subrecipient.
The Review team should introduce themselves, present an overview of the compliance review objectives and process, and confirm arrangements for the review (documents requested, staff interviews, projects or federally funded assets to be inspected,). The subrecipient should have the opportunity to raise any issues they would like to discuss.
- **Interviews and Review of Outstanding documentation** – Covering any outstanding questions or gaps from the desk review.
- **Visit and Inspect Federally Funded Facilities, Vehicles and Other Major Assets** – Including, observing the condition of facility and equipment, reviewing preventive maintenance records for a sample of federally funded revenue vehicles and facilities, verifying that the subrecipient has equipment control procedures, and reviewing procurement files and other documentation to confirm that the subrecipient has effective and comprehensive oversight procedures.

- **Preliminary findings of deficiency** – During the review, the Review Team should check all FTA requirements and tabulate the findings. This will help to identify the preliminary findings and ensure all areas are covered while on site.
- **Exit Conference** – The site visit will conclude with an exit conference during which the Review Team will debrief the subrecipient team.

At the exit conference, the preliminary findings of the deficiency will be distributed by the Review Team and discussed with the subrecipient along with proposed corrective actions and milestones for completion. The subrecipient should advise if any comments have been misstated or if there may be obstacles to the implementation of corrective actions.

The table below indicates the headings used to document findings and an example finding.

Area	Finding	Deficiency	Corrective Action	Response Date
Financial Management & Capacity	Finding	No existing financial plan.	The subrecipient must submit a multi-year financial plan.	10/17/2016

Findings can take a number of forms:

- **‘No finding’**: Subrecipient documentation meets FTA requirements
- **‘Finding’**: Subrecipient is missing documentation or the documentation provided is missing key FTA requirements
- **‘Not Applicable’**: An area can be deemed not applicable if, after an initial assessment, the subrecipient does not conduct activities for which the requirements of the respective area would be applicable

Each finding will be accompanied by a corrective action that must be completed by the subrecipient to bring the project into compliance with FTA requirements. The corrective actions, along with timescales for completion, form a corrective action plan which the subrecipient will be monitored on. Corrective actions could include developing new policies and procedures, training staff, and monitoring of staff performance to ensure compliant policies are followed.

Corrective actions should be specific, measurable, and assignable to the subrecipient and ensure the deficiency is removed. The timescale given for the corrective action should be realistic, but enable the deficiency to be removed as quickly as possible. All corrective actions should be completed within 90 days of the date of the final report.

Some findings may be historic one-off events, for example not completing an equity analysis for a past fare or service change. As it is too late to undertake the analysis as the change has occurred, the subrecipient should instead be asked to submit procedures ensuring the requirement is not missed in the future. If this is done, the finding would not be carried in future compliance reviews.

iii) Compliance Review Report

Based on the findings noted in the Exit Conference, the Review Team Leader will develop a report indicating any performance gaps identified in the relevant compliance areas as a result of the review. The draft report should be sent to the subrecipient for comment 10 business days after the date of the site visit.

Between the site visit and date of the draft report the subrecipient can submit to the Review Team documentation that will be considered in the draft report. Documentation can take two forms:

- If the documentation provides clarification that the subrecipient was compliant at the time of the site visit, reference to the finding should be removed.
- If the documents provide evidence that a finding has been corrected since the site visit, the finding should be listed in the draft report, but noted as closed.

The subrecipient will be sent the FTA Compliance Review Report and corrective action plan 10 days after the date of the site visit and should be given 10 business days in which to comment on the corrective actions planned or recommended. Appendix E provides a letter template to send recipients with the draft report. Amendments to the FTA Compliance Review Report can be agreed by the project manager where necessary.

The FTA Compliance Review Report will be submitted to the General Manager or designee for transmittal to the subrecipient.

iv) Corrective Action Monitoring

The Project Manager will be responsible for tracking the status of all corrective actions and determining when all corrective action requirements have been met within the agreed timeframe. A Subrecipient Compliance Checklist for tracking corrective actions is in Appendix F. Progress should be reported to the Grants Administrator. If a subrecipient does not deliver the corrective actions in the agreed timeframe, future payments may be withheld or additional funding may not be provided.

Closeout Reviews

Grant closeout is the term used to signify the process by which FTA determines that all activities in a grant are complete and Federal funds have been expended.

The project manager will conduct a formal Grant Closeout Review prior to closing out any FTA subrecipient cooperative agreement. This ensures all program requirements have been met and properly documented, and that all requests for reimbursement have been processed. Final reimbursements will be held until sub grant closeout has been initiated.

All closeout documentation must be submitted within 90 days of the completion of all activities in the grant.

The results of the closeout review will be documented in a final status report for the project/subrecipient. A summary of the closeout activity will be included in the FTA quarterly reports.

Appendices

The table below contains a list of the tools and templates that accompany this procedure document.

A. Letter Desk Review Info
B. Letter Site Visit Notification
C. Letter Pre-Site Visit Info Report
D. Letter Draft Compliance Report
E. Subrecipient Compliance Checklist

Mr./Mrs.

Executive Director

[Subrecipient]

Street Address

City, State, Zip

Re: FTA Subrecipient Compliance Review and Information Request

Dear Mr. / Mrs. Executive Director:

Valley Regional Transit is conducting a Subrecipient Compliance Review of your agency. This annual desk based review determines whether a subrecipient is administering its FTA-funded programs in accordance with 49 U.S.C. Chapter 53, Federal transit law provisions. It assesses subrecipient management practices and program implementation to ensure that the programs are administered in accordance with FTA requirements and are meeting program objectives.

Please find attached a Subrecipient Information Request which provides instructions and document requests. If you believe any document requested is not applicable to your organization, please explain why. Your responses to this request will support our assessment of your agency's compliance with federal requirements.

Please send the requested information to Valley Regional Transit by [insert date].

The findings and any corrective actions will be discussed with you following the review.

If you have any questions about the review, the discussion items or the documentation required, please contact [insert project manager name and contact information].

Sincerely,

[Name]

[Title, Department]

Mr./Mrs.

Executive Director

[Subrecipient]

Street Address

City, State, Zip

Re: FTA Subrecipient Compliance Review and Information Request

Dear Mr./Mrs. Executive Director:

Valley Regional Transit plans on conducting a Subrecipient Compliance Review of your agency on [insert date]. The review will determine whether you are administering your FTA-funded programs in accordance with 49 U.S.C. Chapter 53, Federal transit law provisions and our subrecipient agreement. The purpose of the review is to assess your management practices and program implementation to ensure that programs are administered in accordance with FTA requirements and are meeting program objectives.

Our process begins with the attached Subrecipient Information Request which provides instructions and document requests. Your responses to this request will support our assessment of your agency's compliance with federal requirements.

Please send the requested information to Valley Regional Transit by [date]. If you believe any document requested is not applicable to your organization, please explain why. This document request includes a list of procurement files, as the Review Team will wish to review a sample of files on site. The sample of files will be determined before the site visit.

Please have members of your staff who are familiar with the topics and related issues available during the site visit so that our time together will be as productive as possible.

If you have any questions about the review, the discussion items or the documentation required, please contact [insert project manager name and contact information]. We look forward to a meaningful and successful visit. Thank you.

Sincerely,

[Name]

[Title, Department]

Mr./Mrs.
Executive Director
[Subrecipient]
Street Address
City, State, Zip

Re: FTA Subrecipient Compliance Review and Information Request

Dear Mr./Mrs Executive Director:

Valley Regional Transit will be conducting a Subrecipient Compliance Review of your agency. The review will determine whether you are administering your FTA-funded programs in accordance with 49 U.S.C. Chapter 53, Federal transit law provisions and our subrecipient agreement. The purpose of the review is to assess your management practices and program implementation to ensure that programs are administered in accordance with FTA requirements and are meeting program objectives.

On [date] we sent you a Subrecipient Information Request providing instructions and document requests. Thank you for the documents you have sent us.

In order for your agency to prepare for the on-site review, we have provided you with our initial review of the documents received so far. This outlines the documents received, missing documents and any issues with submitted documents outlined under the 'comments' sections. Please review the attached report in advance of the site-visit. Please have all outstanding documents available for the Review Team at the site visit and ensure all relevant staff members are available for interview.

As agreed, the site visit will occur [dates]. This will start with an Entrance Conference [time date] introducing the Review Team, and will conclude with an Exit Conference at [time/date] to discuss the preliminary findings. During the review the team will undertake interviews, review documentation and visit and inspect federally funded facilities, vehicles and other major assets.

If you have any questions about the Pre-Visit Information report or the review activities, please contact [insert project manager name and contact information]. We look forward to a meaningful and successful visit. Thank you.

Sincerely,

[Name]
[Title, Department]

Mr./Mrs.

Executive Director

[Subrecipient]

Street Address

City, State, Zip

Re: FTA Subrecipient Compliance Report

Dear Mr./Mrs Executive Director:

As you know, Valley Regional Transit recently undertook a Subrecipient Compliance Review of your agency. This review determines whether a subrecipient is administering its FTA-funded programs in accordance with 49 U.S.C. Chapter 53, Federal transit law provisions. It assesses subrecipient management practices and program implementation to ensure that the programs are administered in accordance with FTA requirements and are meeting program objectives.

The review focused on [subrecipients] compliance in [#] areas. No deficiencies were found with FTA requirements in [#] areas. Deficiencies were found in [#] areas [LIST]. [Subrecipient] had [#] repeat deficiencies from the previous [date] Subrecipient Compliance Review, in the areas of [LIST].

Please find attached a draft Compliance Review Report, outlining these findings and the corrective actions.

Please review this draft report for accuracy and provide your comments to the Review Team Leader within ten business days from the date of this letter. A final report, that incorporates your comments to the draft report, will be provided to you within [#] business days of your response.

Thank you for your cooperation and assistance during this Subrecipient Compliance Review. If you have any questions, please do not hesitate to contact [review team leader name and contact info].

Sincerely,

[Name]

[Title, Department]

Subrecipient Compliance Checklist

(E)

Subrecipient: _____

Contract Number: _____

Period: _____

Grantee

Grantee Staff

Reviewer: _____

Date: _____

Area	Requirement	Completed		Corrective Action	Due Date
		Yes	No		
Vehicle Maintenance	Preventive Maintenance performed on time				
	Conducts Maintenance on Accessible features				
Complaints	Records and Documents Complaints				
	Resolves Complaints				
Physical Inventory	Records fixed assets being managed				
	Assesses physical condition				
Procurement	Captures all FTA required elements				
	Maintains procurement documentation				
Driver Training	Conducts initial training				
	Conducts refresher training				
DBE Compliance	Submits timely and accurate semi-annual data				
	Shows evidence ensuring DBE participation				
ADA Compliance	Provides accessible facilities and vehicles				
	Trains staff in requirements to proficiency				
	Monitors service and customer satisfaction				
	Addresses Complaints				

Area	Requirement	Completed		Corrective Action	Due Date
		Yes	No		
Title VI	Provides training as required				
	Ensures public notice				
	Addresses complaints				
Drug and Alcohol	Performs D&A testing at FRA				
	Audits third-party specimen				
EEO Plan	Updates plan as needed				
	Evaluate areas of				
Overall	Maintains detailed Records				
	Analyze performance				
	Implements Corrective Actions				

CONTRACTOR OVERSIGHT PROCEDURES

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1. Summary

Contractor shall coordinate, manage and control all necessary operational activities which shall include: Develop and maintain current administrative procedures and financial records; monitor adherence to the VRT vehicle maintenance plan; Implementation, oversight and monitor company safety program; data collection, input and verification; Sufficient staffing and training; Develop and implement methods to improve service quality and maximize efficiency.

In addition to operational activities the Contractor shall also ensure all Federal, State and local regulatory compliance standards are strictly adhered to. Contractor must also have all applicable State and local business licensures. Contractor shall maintain all required State and local vehicle licensure and registration documentation for VRT-owned vehicles.

2. Operating Requirements

VRT plans for a *major service change* implementation every other year. A major service change can consist of system restructure to service expansion or reduction. Because of the time and coordination involved with successfully executing a change of this magnitude, they are typically planned to happen every other year (example FY14 & FY16). In off years or odd numbered years, VRT will work in partnership with the Contractor to analyze current service and historical data to identify opportunities for improvements to be made through small scale service *adjustments*. The Contractor and VRT will arrive at a mutually agreed upon timeframe for the service changes to be implemented in order to allow for the Contractor to be fully prepared with adequate staffing, training, and support for the provision of said services.

VRT shall have the option to add to or delete from the given schedule or to redeploy revenue service to other areas based on demand or changes in service productivity. Contractor agrees that revenue vehicle hours may be increased or decreased by up to twenty percent (25%) of the total planned levels of service as described in the RFP, and upon which proposed contract rates were based, without re-negotiation of basic price over the term of the contract.

VRT will provide, at a minimum, a 30-day notice to the affected Contractor prior to a service change being implemented. VRT will be exempt from notice requirements in the event of a declared emergency, natural disaster or any other circumstance beyond VRT control or ability anticipate.

Additional services, beyond the published fixed-route timetables, shall be accommodated whenever possible, and without interruption to published service. Such additional services will be billed at the appropriate per hour cost by service type.

3. Management

Contractor shall be held responsible for management of all operational activity according to specified operating procedures. The General Manager shall be proficient in computer communications and in daily on-line communication with VRT staff. VRT may establish additional rules, which are reasonable for operation of service, after consultation with Contractor.

All VRT transit staff shall have the capability to contact the management positions or equivalent by e-mail and vice versa. VRT staff shall be able to electronically address staff in the same manner that VRT staff can address any other member of VRT staff. Contractor staff must be able to read any attachments sent by VRT staff.

As part of its efforts to maintain superior on time performance, the Contractor must require all operators' report any delay in service exceeding 10 minutes. The Contractor must also regularly monitor dispatch logs to assure all delays are duly reported, and to differentiate between chronic and acute problems. For acute problems, the methods used to address the problem must be evaluated with the goal of improving the response to future problems. For chronic problems, the Contractor must investigate the cause, take corrective action and/or document the problem, cause and recommended correction to VRT whenever is necessary to solve the problem. Whenever service is disrupted or delayed for any reason, the Contractor must always make sure that it does everything possible to make sure that customers on board a bus are transported to their destination safely and as close to the published schedules as possible and that all customers waiting for a bus are served in a safe manner as close to the scheduled time as possible. Whenever stops are physically unreachable, or deemed as out of service, the Contractor must make all efforts to notify potential customers, and update the Operations Director, Public relations officer, customer service team, and offer alternatives if possible.

4. Personnel

Contractor shall be solely responsible for the satisfactory work performance of all Contractor employees providing service. Contractor shall be solely responsible for carrying out the steps necessary for the prompt payment of all employees and/or Contractor retained subcontractors' wages and benefits. Contractor shall comply with the requirements of employee liability, workers' compensation, unemployment insurance and social security. Contractor shall immediately notify VRT of any occurrence where liability, damages, claims and unbudgeted expenses of any nature arising from alleged violations of personnel practices. VRT shall have the right to demand removal from service, for reasonable cause, any personnel furnished by Contractor. Contractor shall not, absent prior written notice to, and written consent by VRT, remove or re-assign any support personnel at any time prior to or after execution of the Contract.

Contractor shall designate the following personnel:

General Manager

Contractor shall designate a General Manager whose responsibility shall be to manage and administer the day-to-day operations of all service, and act as primary liaison with the VRT.

Maintenance Manager

Contractor shall designate a Maintenance Manager, whose responsibility shall be to perform all necessary oversight of day to day maintenance, equipment, buildings and ground activities.

Human Resource Manager/Coordinator

Contractor shall designate a Human Resources Coordinator/Manager whose responsibility shall be to perform all necessary administrative support functions to maintain regulatory compliance, labor agreement, personnel and payroll activity.

Purchaser

Contractor shall provide sufficient support to successfully support purchasing and reconciliation activities.

Operations Manager

Contractor shall designate an Operations Manager, whose responsibility shall be to perform all necessary oversight of day to day operational activities.

Dispatch Supervisor

Contractor shall provide sufficient dispatch staff to successfully maintain the level and quality of service prescribed in this contract. In no case shall staffing levels be less than originally proposed by Contractor.

Contractor shall have personnel available at all times that service is operating capable of answering inquiries of the public and responding to complaints regarding transit service. Telephone should be answered within five (5) rings. The Contractor shall also have dispatch personnel for fixed-route and paratransit service monitoring all two-way radio communication during all service hours. The phone number(s) used for this purpose will revert to VRT at the end of the contract.

Road Supervisors

Contractor shall provide sufficient road supervisory support to successfully maintain the level and quality of service prescribed in this contract. The road supervisor will perform shelter inspections, on time performance checks, trail checks, follow-up training, field support and other administrative tasks as assigned.

Safety and Training Lead Driver/Supervisor

Contractor shall provide a Safety supervisor, whose responsibility shall be to perform all necessary safety and training activities, and to oversee otherwise-performed safety and training activities.

Trainers

Contractor shall provide staff qualified to train Operators in defensive driving and bus maneuvers, emergency and accident handling procedures, and passenger relations. At minimum, the Trainer must be TSI Certified.

Vehicle Operators and Other Personnel

All vehicle Operators will be assigned on a consistent and regular basis to provide as much continuity in service as possible. Contractor shall supply a sufficient number of properly qualified personnel to operate and maintain its equipment and to provide the service required. All Contractor's employees at all times while on duty in the performance of service required herein, shall be neatly and cleanly dressed and shall maintain a courteous and cooperative attitude in their contact with the public. All such personnel who are likely to be in contact with the public shall be trained by Contractor to give accurate information concerning routes and schedules of service. Contractor shall also train operators to proficiency in the operation of equipment onboard the bus including emergency Lift Deployment, Header Sign programming, GFI functionality and AVL/GPS functionality.

Vehicle operators must have a valid Idaho Class B driver's license with passenger and air brake endorsements, as well as any other licenses required by applicable federal, state and local regulations. Contractor shall comply with the requirements of U. S. Department of Transportation drug testing regulations to the extent they are legally enforceable. A vehicle operator who does not pass the medical examination shall not be permitted to operate a vehicle. Any vehicle operator providing paratransit service shall be trained in all operational procedures relating to paratransit, including a thorough knowledge of the service area street network.

Operators shall be fully trained in defensive driving and bus maneuvers, emergency and accident handling procedures, and passenger relations.

Operators shall assist passengers confined to wheelchairs in boarding and shall be responsible for wheelchair securement. Operators shall assist passengers who have difficulty negotiating the steps of the vehicle by offering the lift or lowering the vehicles when applicable. Paratransit Operators will assist elderly and disabled passengers in boarding if requested.

Operators shall be trained to operate all types of buses, wheelchair lifts and securement systems, and other equipment, which they may be expected to use in the VRT Paratransit and/or fixed route services.

Regularly assigned Operators or trained back-up Operators shall be available and on time daily to insure consistent and reliable service. Operators shall be in uniform acceptable to VRT Transit System. Uniform shall include shirt/blouse, slacks and jacket, as well as appropriate footwear.

Each Operator shall have an accurate timepiece available and in clear sight at all times during vehicle operation. Timepiece shall be synchronized daily upon sign-on at dispatch. Dispatch timepiece shall be synchronized daily prior to first sign-on.

Upon notice from VRT concerning the conduct, demeanor or appearance of such persons not conforming to the above, Contractor shall take all steps necessary to remove or alleviate the cause of the objection and shall report said steps to VRT.

Contractor agrees to, at minimum, compensate employees within the proposed salary ranges contained in the proposal during the life of the contract.

5. Personnel Performance Standards

Regularly assigned Operators or a trained backup must be available and on time daily to ensure consistent and reliable service. Operators must accurately complete and submit daily the required operating reports.

All personnel are responsible for knowledge of service. Contractor personnel must maintain a courteous attitude, answering to the best of their ability any questions from the public regarding provisions of service. Personnel must also report all passenger complaints and/or operation problems to designated staff.

6. Operating Performance Standards

Vehicles shall be operated with due regard for the safety, comfort and convenience of passengers and the general public. Contractor shall strive to attain at a minimum the following performance goals:

Fixed Route Operations

- Contractor shall strive to maintain **95% on-time route performance.**
- Contractor shall strive to maintain **zero (0) preventable accidents**, as defined by the National Transit Database applying to injury accidents and accidents with property damage in excess of one thousand dollars (\$1,000).
- Contractor shall strive to maintain **100% percent operator sign on**
- Contractor shall strive to maintain a **3 % increase in Unlinked Trips annually**
- Contractor shall strive to maintain a **3% increase in Total Fare box revenue**
- Contractor shall strive to maintain less than **3 validated operator complaints per month**
- Contractor shall strive to maintain an accident frequency of less than **1.2 per 100,000 Miles**
- Contractor shall strive to maintain **0 Missed Tripper month**
- Contractor shall strive to maintain **2 compliments per month**

Demand Response Operations:

- Contractor shall strive to maintain **2.5 passengers per revenue mile**
- Contractor shall strive to maintain **0 trip denials**
- Contractor shall strive to maintain a **95% on time performance rate for trip pick ups**
- Contractor shall strive to maintain **0 trips per month that deemed excessively long**
- Contractor shall strive to maintain **0 missed trips**
- **Call wait times**
- **Eligibility beyond 21 days**

Maintenance:

- Contractor shall strive to maintain at a minimum **5200 miles between chargeable** road failures. A chargeable road failure will be defined as any event in which service is interrupted and causes a bus trade out to be initiated and or route/passengers to be delayed.
- Contractor shall strive to maintain at a minimum 95% on time performance for preventative maintenance inspections.
- A rating of "exceptional" with regard to the appearance and condition of vehicles, as determined by VRT inspection. Contractor shall strive to maintain a maximum number of miles between road calls.
- Contractor shall strive to maintain a vehicle ready list consisting of at a minimum **2 spares or 10% whichever is greater.**
- Contractor shall strive to maintain less than **3 validated operator complaints per month**

7. Fixed Route Reports

Monthly Performance Report

The **Monthly Operating Report** shall be submitted to VRT by the 20th day of the month for the previous month of service. The Contractor shall utilize the Monthly Performance Report together with other operational reports to monitor and analyze operational trends. Favorable and **unfavorable variances in performance (+/- 10%)** when compared to the month prior shall be investigated prior to report submission. Contractor will note any necessary corrective actions to be necessary to remedy unfavorable variances and those notes will be monitored on a weekly basis.

NOTE: See the following reports below for examples of monthly reporting criteria. Appendix A - Sample Monthly Performance Report; Appendix B - Sample PMI Inspection Report form; Appendix C – Route Summary Report

Quarterly Reports

The quarterly report form will be accompanied by the monthly performance report in the months of January, April, July and October which is in alignment with the Federal fiscal cycle. The report shall be comprised of a budget analysis by service mode and review of major costs categories within the Administrative, Operations and maintenance areas. The Contractor shall investigate and note any areas of favorable or unfavorable variances (+/-10%) when budget to actuals are compared.

The First Quarter - Quarterly Report will include a projection of costs over the next fiscal year in preparation for the next budget year. For example, in January of 2018 the Contractor shall submit to VRT three separate report documents:

- The monthly performance report form for December 2017
- The quarterly report form for the period of October 2017 through December 2017
- The Annual Budget Expense Projections form for FY19

Annual Reports

Annual Report form, which summarizes the required monthly and quarterly reports, shall be submitted to VRT during the last two weeks of the month following the end of each fiscal year.

The Annual report shall be submitted to VRT by the 20th day of the month for the previous quarter of service.

8. Paratransit Reports

Contractor shall also collect data for each day of Paratransit service operation. The following reports are the minimum required for each vehicle in operation. The Report shall be submitted to VRT by the 20th day of the month for the previous month of service.

Monthly Reports:

- **Revenue Hours and Revenue Mileage Report** summarizes *vehicle-specific* monthly information. The Report shall be submitted to VRT by the 20th day of the month for the previous month of service.

Quarterly Reports:

Ridership and Operating Data Form A. The Report shall be submitted to VRT by the 20th day of the month for the previous month of service.

Annual Reports:

Annual Reports, which summarize the required monthly and quarterly reports, shall be submitted to VRT during the first week following the end of each fiscal year.

9. Dispatcher Daily Operational Logs

Dispatcher logs shall be maintained daily and shall include but not be limited to the following information.

- Report of Surveys Assigned and completed
- Log of wheelchairs onboard vehicle
- Log of service interruptions
- Log of call-ins for Stops, Shelters or benches reported lost, closed damage or stolen.
- Weather documentation a.m. / p.m.
- Trips delayed longer than 6 minutes or more
- Log of Capacity shall indicate route, run, time, location and number passengers left. Standing loads will also be documented.
- Road calls log shall indicate route, run time, location, vehicle responded to, mileage expended by service vehicle, and lost revenue vehicle hours and miles
- Paratransit
- On timer performance report including denials, late or missed trips
- Excessively long trips
- Daily passenger and vehicle trip logs shall be maintained by Operators and shall include but not be limited to the following information:
 - Operator name and vehicle number.
 - Total daily passenger counts, by fare type, by VRT and by passenger category.
 - Passenger pick-up and drop-off times and locations for demand- responsive service.
 - Mileage recorded for each passenger pick-up and drop-off as well as daily revenue mileage by vehicle, including mileage leaving and at return to base.
 - Trip Denial Report will provide daily information, which lists each denied client name and a description of the trip denied.
- Dispatcher logs shall be maintained daily and shall include but not be limited to the following information
 - A report of the previous week's missed trips;
 - Trips delayed between 5 and 15 minutes; and
 - Trips delayed more than 15 minutes in a format approved by VRT.
- Road calls log shall indicate route, run time, location, vehicle responded to, mileage expended by service vehicle, and lost revenue vehicle hours and miles.

VRT may elect to authorize representatives of other project funding partners (e.g.- ITD, FTA, DHLS, TSA) to inspect, audit and analyze Contractor's in-service records or Contractor's operation of this service. Additional documentation of service may be provided through passenger surveys. These surveys may be administered by authorized representatives of VRT or its designee. It is the responsibility of Contractor to ensure the

cooperation of all personnel with any operational procedures pertaining to survey work, including the distribution of survey questionnaires, etc.

10. Compliance Reporting and Auditing

In order to document service, Contractor shall be required to maintain all operational records as requested by VRT and as required for good business practices.

Contractor shall utilize the appropriate management information system (MIS) to input, maintain and report monthly on key performance areas related to safety, reliability, customer satisfaction, cleanliness and overall service quality. Contractor shall permit authorized representative of VRT to examine all data and records related to service upon request by VRT or according to the scheduled reporting/auditing periods. All service records prepared by Contractor shall be owned by VRT and be made available to VRT at no additional charge.

Contractor shall collect, maintain and transmit to VRT all data necessary to complete the following reports:

- National Transit Data (NTD) annual report
- Drug and Alcohol (MIS) report
- Randomized trip sampling (surveys)
- OSHA 300 Reporting
- EEO Reporting

Contractor shall collect and verify the accuracy data for each day of fixed-route service operation. Data collected during day to day operations include operating costs, customer service complaints, service desk reports, on time performance checks, revenue, ridership, miles, hours, road calls, inspections completed, incidents and accident occurrences. The following reports are required for each bus route in operation. Such reports shall be prepared in a format approved by VRT, and shall be submitted as follows:

11. Monitoring of Service (VRT)

VRT shall have the right to have authorized VRT personnel board, at no cost to VRT, access all buses utilized by Contractor in the performance of service for the purpose of monitoring service. VRT shall periodically monitor Contractor's performance relative to on time performance, preventative maintenance adherence, missed passenger trips, availability of safety and accessibility equipment on vehicles, adherence to recordkeeping requirements, customer complaints and responses, vehicle appearance, completion of daily manifests by drivers, functionality of vehicle heating and air conditioning, availability of vehicle communications equipment, and other performance categories. Such monitoring shall be used by VRT to determine if the Contractor is meeting performance standards included in the contract. Upon mutual agreement, at any point during the term of the contract, incentives may be offered for exceeding the performance standards and penalties may be assessed for poor performance.

12. Liability, Insurance, and Indemnification

Contractor agrees to notify VRT in the event of any occurrence which may lead to liability, expense, including defense costs and legal fees, and claims for damages of any nature whatsoever, including, but not limited to, bodily injury, death or property damage, including property of the Contractor, arising from or connected with Contractor's operation of service hereunder, and including any workers' compensation suits, liability or expense, arising from or connected with service performed on behalf of Contractor by any person pursuant to this Contract.

Contractor shall not be deemed to assume liability for wrongful or negligent acts of VRT or its agents, officers, employees or subcontractors. Contractor shall maintain a proactive safety culture where employees are regularly trained on incident/accident prevention. Contractor shall keep records of such training readily available upon request.

Without limiting Contractor's indemnification of VRT, Contractor shall manage and process the following program(s) of insurance covering its operation hereunder. Contractor shall also agree to the following conditions:

VRT, its officers, agents and employees, shall be included as additional insured on all liability insurance policies except: Workers' Compensation, and Legal Liability coverage (such as Fire, Legal). VRT shall be named Loss Payee as its interest may appear in all property insurance.

On a monthly basis, the Contractor shall report all employee injuries and qualifying OSHA events to VRT for review.

13. Safety and Training

Contractor shall maintain an ongoing employee safety and training program. Contractor shall also maintain an Operator sensitivity and empathy training program directed toward the needs of elderly and disabled passengers. In addition, Contractor shall check driving records at least every (12) months beginning at the start of service for accidents, vehicle code violations, and valid driver's licenses of those employees whose job requires them to operate service vehicles. Contractor shall notify VRT within five (5) days of the results of said checks and corrective actions, if any, taken.

Drug & Alcohol

Contractor shall comply with the drug and alcohol testing regulations found in 49 CFR Parts 653, 654, 655. Reports of drug tests and surveillance program shall be made available to designated VRT personnel upon request in accordance with this policy. Contractor also agrees to audit the MRO under contract to ensure proper licensures and processes are being adhered to. VRT agrees to maintain necessary confidentiality. Any part of this policy, which is held to be unenforceable, will not affect the other provisions of the policy.

14. Fares

It will be the responsibility of the Contractor to accurately collect and honor all fare media as required by VRT for the duration of the contract. This may include any of the following: collection of full cash fares, collection of discount cash fares, honoring of prepaid monthly, unlimited use passes and honoring of other discount or free fare media.

VRT shall at all times make available to the Contractor a complete list of current Employers and Student passes which are eligible for a non-cash fare trip upon presenting a valid identification. In the case of discount, prepaid, free or promotional fares, VRT shall also make available a list of what kind of identification, if any, must be presented by the passenger and verified by the transit vehicle operator in order to qualify for the fare.

It will be the responsibility of the Contractor to ensure that the correct identification has been presented by the passenger and verified by the vehicle operator prior to acceptance of the discount, prepaid, free or promotional fare media. In the absence of presentation and verification of the appropriate identification as indicated above, it will be the responsibility of the Contractor to collect the full fare.

Fare Reports

- All fares and tickets collected by the operator must be counted and reported daily to the Operations Manager. **Reports depicting the daily cash fare revenue collected are to be submitted to VRT weekly.** Bank receipts supporting fare box and pass sales revenues must accompany all service invoices. The amount of all collected fares and transfer slips and passes should correspond to the reported number of passengers carried less reasonable exceptions.
- The Contractor shall outline, establish, and implement fare collection security policies and procedures, subject to the approval of VRT. The Contractor shall describe security procedures and all efforts to safeguard fare revenue. Contractor shall be held responsible for any lost or stolen fare revenue. Contractor shall keep an accurate accounting of actual fare revenue. Contractor shall conduct or assist in any security investigations determined necessary by VRT.

15. Marketing

VRT will provide marketing, public relations and advertising; therefore, these costs shall not be included in the contract. However, Contractor shall place advertising materials on the vehicles as requested by VRT and shall distribute literature on the vehicles as requested by VRT.

16. Operation during a Declared Emergency

Upon declaration of any emergency the Contractor in coordination with VRT will be responsible for a number of transportation activities, including development of emergency travel routes and coordination with other agencies supplying common carrier services.

In the event of a declared emergency, Contractor shall deploy vehicles in a manner described by¹⁴ the VRT Operations Director. However, VRT shall only be obligated to compensate Contractor for service costs that exceed the normal expense of operating service during such period of declared emergency.

17. Title VI

Title VI Civil Rights Act of 1964: (The following requirements apply to contractors)

Nondiscrimination- In accordance with Title VI of the Civil Rights Act, as amended, 42 U.S.C. §2000d, Section 303 of the Age Discrimination Act of 1975, as amended, 42 U.S.C. § 6102, section 202 of the Americans with Disabilities Act of 1990, 42 U.S.C. § 12132, and federal transit law at 49 U.S.C. § 5332, the Contractor agrees that it will not discriminate against any employee or applicant for employment

because of race, color, creed, national origin, sex, age, or disability. In addition, the Contractor agrees to comply with applicable federal implementing regulations and other implementing requirements FTA may issue.

Equal Employment Opportunity —

The following equal employment opportunity requirements apply to Contractors.

Race, Color, Creed, National Origin, Sex – In accordance with Title VII of the Civil Rights Act, as amended, 42 U.S.C. § 2000e, and federal transit laws at 49 U.S.C. § 5332, the Contractor agrees to comply with all applicable equal employment opportunity requirements of U.S. Department of Labor (U.S. DOL) regulations, "Office of Federal Contract Compliance Programs, Equal Employment Opportunity, Department of Labor," 41 C.F.R. Parts 60 et seq., (which implement Executive Order No. 11246, "Equal Employment Opportunity," as amended by Executive Order No. 11246 Relating to Equal Employment Opportunity," 42 U.S.C. § 2000e note), and with any applicable federal statutes, executive orders, regulations, and federal policies that may affect the Contractor construction activities undertaken in the course of the project. The Contractor agrees to take affirmative action to ensure that applicants are employed, and that employees are treated during employment, without regard to their race, color, creed, national origin, sex, or age. Such action shall include, but not be limited to, the following: employment, upgrading, demotion or transfer, recruitment or recruitment advertising, layoff or termination; rates of pay or other forms of compensation; and selection for training, including apprenticeship. In addition, the Contractor agrees to comply with any implementing requirements FTA may issue.

Age- In accordance with Section 4 of the Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. § 623 and federal transit law at 49 U.S.C. § 5332, the Contractor agrees to refrain from discrimination against present and prospective employees for reason of age. In addition, the Contractor agrees to refrain from discrimination against present and prospective employees for reason of age. In addition, the Contractor agrees to comply with any implementing requirements FTA may issue.

Disability- In accordance with section 102 of the Americans with Disabilities Act, as amended, 42 U.S.C. § 12112, the Contractor agrees that it will comply with the requirements of U.S. Equal Employment Opportunity Commission, "Regulations to Implement the Equal Employment Provisions of the Americans with Disabilities Act," 29 C.F.R. Part 1630, pertaining to employment of persons with disabilities. In addition, the Contractor agrees to comply with any implementing requirements FTA may issue.

Contractors also agrees to include these requirements in each subcontract financed in whole or in part with federal assistance provided by FTA, modified only if necessary to identify the affected parties.

18. Disadvantaged Business Enterprise (DBE) Participation:

The Contractor agrees to ensure that Disadvantaged Business Enterprises as defined in 49 CFR Part 23 have the maximum opportunity to participate in the performance of contracts and subcontracts. In this regard, the Contractor shall take all necessary and reasonable steps in accordance with 49 CFR Part 23 to ensure that Disadvantaged Business Enterprises have the maximum opportunity to compete for and perform contracts. The Contractor shall not discriminate on the basis of race, creed, color, national origin, age, or sex in the award and performance of DOT assisted contracts.

Transit Vehicle Manufacturers- Transit vehicle manufacturers must certify compliance with DBE regulations.

19. EEO

The U.S. Equal Employment Opportunity Commission (EEOC) is responsible for enforcing federal laws that make it illegal to discriminate against a job applicant or an employee because of the person's race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age (40 or older), disability or genetic information. It is also illegal to discriminate against a person because the person complained about discrimination, filed a charge of discrimination, or participated in an employment discrimination investigation or lawsuit.

Most employers with at least 15 employees are covered by EEOC laws (20 employees in age discrimination cases). Most labor unions and employment agencies are also covered.

The laws apply to all types of work situations, including hiring, firing, promotions, harassment, training, wages, and benefits.

The Contractor shall **submit EEO reports to VRT on an annual basis** per the schedule calendar.

Every three years the contractor is responsible for updating their EEO plan. The Contractor shall provide notice to VRT prior to report submission for review and record keeping.

Contractor Oversight VRT will ensure Contractor compliance by following the schedule

APPENDIX A – CONTRACTOR EXAMPLE MONTHLY OPERATING REPORT

MONTHLY OPERATING REPORT					
FISCAL YEAR	2016				
MONTH	November				
DIVISION	21				
Productivity Measures	Month Current Year	Month Previous Year	Percent Change	Goal	Performance Recommendation
Total Unlinked Trips	96474	94538	2.0%		Favorable - This is the first month over month increase since June of 2015
Total Expenses	568064.12	471432.08	17.0%		
Total Farebox	26244.85	52274.56	-99.2%		GL was not updated 12/15
Total Revenue Hours	6236.68	5467.62	12.3%		PM service expansion
Total Revenue Miles	77906.3	68427.2	12.2%		PM service expansion
Revenue per Revenue Hour	4.21	9.56	-127.1%		GL was not updated 12/15
Revenue per Revenue Mile	0.34	0.76	-123.5%		GL was not updated 12/15
Passengers per Revenue Hour	15.47	17.29	-11.8%		
Passengers per Revenue Mile	1.24	1.38	-11.3%		
Cost per Revenue Hour	91.08	86.22	5.3%		GL was not updated 12/18
Cost per Revenue Mile	7.29	6.89	5.5%		GL was not updated 12/19
Average Fare	0.27	0.55	-103.7%		GL was not updated 12/20
Safety and Security Measures	Month Current Year	Month Previous Year	Percent Change	Goal	Performance Recommendation
Number of Accidents	3	2			Not Favorable - there has been a rise in safety events
Number of Preventable Accidents	1	0			Not Favorable - Safety Plan and team in development
On-the-Job Accidents	1	0			Not Favorable
Crimes Against Passengers	0	0			
Crimes Against Staff	0	0			
Incidents of Vehicle Vandalism	0	0			
Incidents of Facility Vandalism	0	0			
Reliability Measures	Month Current Year	Month Previous Year	Percent Change	Goal	Performance Recommendation
Road Failures	13	5	61.5%		Uptick has not been isolated to a fleet. Gilligs war
Miles per Road Failure	5992.79	13685.44	-128.4%		Not Favorable
Accidents per 100,000 Miles	2.6	1.7			Preventable accidents per 100k = 0.00 in 2014 & 2015
On Time Percentage	0	0			No data was entered into the system for November
Number of Missed Trips	6	2	66.7%		Maintenance road failures have increased
					Favorable - valid complaints have remained on a downward trend through 2015
Number of Complaints	17	26	-52.9%		
Number of Compliments	2	1	50.0%		Favorable
Valid Complaints	2	3	-50.0%		Favorable

APPENDIX B – CONTRACTOR SAMPLE PMI INPSECTION REPORT FORM

Canyon County
Month of November 2016

Preventative Maintenance Inspection Report

AssetNo	InspectionId	Inspection #	Type	Description	MileageMessage	MilesLastInspection	ActualMiles	ForecastMiles	Insp MilesRemaining	FleetId	DateLastInspected
N334	N33	7	A	3K	Inspection Due	2727	3000	2500	273	N330	9/6/2016
N104	NSV	9	A	3K	Inspection Due	2516	3000	2500	484	NSV	4/11/2016
N1502	N15	9	A	3K		2489	3000	2500	511	N015	8/19/2016
N333	N33	6	A	3K		2357	3000	2500	643	N330	9/8/2016
N331	N33	9	A	3K		2344	3000	2500	656	N330	9/1/2016
N2505	N25	11	A	3K		2081	3000	2500	919	N025	8/29/2016
N102	NSV	9	A	3K		1757	3000	2500	1243	NSV	4/25/2016
N336	N33	7	A	3K		1581	3000	2500	1419	N330	9/12/2016
N613	N600	7	I	3K		1579	3000	2500	1421	N600	9/13/2016
N617	N600	1	I	3K		1541	3000	2500	1459	N600	9/9/2016
N332	N33	2	A	3K		1447	3000	2500	1553	N330	8/29/2016
N614	N600	10	A	6K		1228	3000	2500	1772	N600	9/15/2016
N615	N600	14	A	6K		1039	3000	2500	1961	N600	9/16/2016
N337	N33	8	C	24K		990	3000	2500	2010	N330	9/16/2016
N1501	N15	7	A	3K		859	3000	2500	2141	N015	8/25/2016
N2508	N25	16	D	48K		824	3000	2500	2176	N025	8/26/2016
N281	N25	6	A	3K		736	3000	2500	2264	N025	8/24/2016
N611	N600	12	C	36K		675	3000	2500	2325	N600	9/7/2016
n101	NSV	14	A	3K		510	3000	2500	2490	NSV	8/9/2016
N2502	N25	5	A	3K		0	3000	2500	3000	N025	9/22/2016
N335	N33	12	B	12K		0	3000	2500	3000	N330	9/26/2016
N612	N600	24	D	72K		0	3000	2500	3000	N600	9/23/2016
N616	N600	13	I	3K		0	3000	2500	3000	N600	9/21/2016

APPENDIX C – CONTRACTOR ACCIDENT/INCIDENT ANALYSIS

Valley Regional Transit ACCIDENT/INCIDENT ANALYSIS REPORT

* This report is due on or before the 20th work day of every month for the previous month

PREPARED BY: **Billy Wingfield**
 REPORT MONTH: **January**
 REPORT YEAR: **2018**
 LOCATION:

ACCIDENT SUMMARY			CURRENT MONTH	YEAR TO DATE	PREV YR MONTH	PREV YR TO DATE
TOTAL ACCIDENTS			2	2	5	5
	<i>Preventable Street Accidents</i>		2	2	0	0
	<i>Preventable Yard Accidents</i>		0	0	0	0
	<i>Non-Preventable Accidents</i>		0	0	5	5
	<i>NTD Reportable Accidents</i>		1	1	0	0
MILES OPERATED			120,370	120,370	124,160	124,160
Preventable Street Accident Freq. Rate per 100,000 Miles			1.66	1.66	0.00	0.00
Total Accident Freq. Rate per 100,000 Miles			1.66	1.66	4.03	4.03
Total Preventable Accident Freq. Rate per 100,000 Miles			1.66	1.66	0.00	0.00
Total NTD Reportable Accident Freq. Rate per 100,000 Miles			0.83	0.83	0.00	0.00
INJURY SUMMARY			CURRENT MONTH	YEAR TO DATE	PREV YR MONTH	PREV YR TO DATE
TOTAL EMPLOYEE INJURIES			0	0	0	0
	<i>Preventable Injuries</i>		0	0	0	0
	<i>Non-Preventable Injuries</i>		0	0	0	0
	<i>Lost Time Injuries</i>		0	0	0	0
	<i>No Lost Time Injuries</i>		0	0	0	0
	<i>Lost Time Injuries from Non Prev MVA</i>		0	0	0	0
TOTAL HOURS WORKED			18,041	18,041	12684.51	12,685
Lost Time Injury Freq. Rate per 200,000 Hours			0.00	0.00	0.00	0.00
Total Injury Freq. Rate per 200,000 Hours			0.00	0.00	0.00	0.00
Preventable Injury Freq. Rate per 200,000 Hours			0.00	0.00	0.00	0.00
OSHA SUMMARY			CURRENT MONTH	YEAR TO DATE	PREV YR MONTH	PREV YR TO DATE
TOTAL # OF DEATHS			0	0	0	0
TOTAL # OF CASES WITH DAYS AWAY FROM WORK			0	0	0	0
TOTAL # OF CASES WITH JOB TRANSFER/RESTRICTION			0	0	0	0
TOTAL # OF OTHER RECORDABLE CASES			0	0	0	0
TOTAL # OF DAYS AWAY FROM WORK			36	36	0	0
TOTAL # OF DAYS OF JOB TRANSFER/RESTRICTION			6	6	0	0
TOTAL # OF INJURIES			0	0	0	0

APPENDIX D – ACCIDENT/INCIDENT ANALYSIS

Valley Regional Transit ACCIDENT/INCIDENT ANALYSIS REPORT

* This report is due on or before the 20th work day of every month for the previous month

PREPARED BY: **Billy Wingfield**
REPORT MONTH: **January**
REPORT YEAR: **2018**
LOCATION:

ACCIDENT SUMMARY			CURRENT MONTH	YEAR TO DATE	PREV YR MONTH	PREV YR TO DATE
TOTAL ACCIDENTS			2	2	5	5
<i>Preventable Street Accidents</i>			2	2	0	0
<i>Preventable Yard Accidents</i>			0	0	0	0
<i>Non-Preventable Accidents</i>			0	0	5	5
<i>NTD Reportable Accidents</i>			1	1	0	0
MILES OPERATED			120,370	120,370	124,160	124,160
Preventable Street Accident Freq. Rate per 100,000 Miles			1.66	1.66	0.00	0.00
Total Accident Freq. Rate per 100,000 Miles			1.66	1.66	4.03	4.03
Total Preventable Accident Freq. Rate per 100,000 Miles			1.66	1.66	0.00	0.00
Total NTD Reportable Accident Freq. Rate per 100,000 Miles			0.83	0.83	0.00	0.00
INJURY SUMMARY			CURRENT MONTH	YEAR TO DATE	PREV YR MONTH	PREV YR TO DATE
TOTAL EMPLOYEE INJURIES			0	0	0	0
<i>Preventable Injuries</i>			0	0	0	0
<i>Non-Preventable Injuries</i>			0	0	0	0
<i>Lost Time Injuries</i>			0	0	0	0
<i>No Lost Time Injuries</i>			0	0	0	0
<i>Lost Time Injuries from Non Prev MVA</i>			0	0	0	0
TOTAL HOURS WORKED			18,041	18,041	12684.51	12,685
Lost Time Injury Freq. Rate per 200,000 Hours			0.00	0.00	0.00	0.00
Total Injury Freq. Rate per 200,000 Hours			0.00	0.00	0.00	0.00
Preventable Injury Freq. Rate per 200,000 Hours			0.00	0.00	0.00	0.00
OSHA SUMMARY			CURRENT MONTH	YEAR TO DATE	PREV YR MONTH	PREV YR TO DATE
TOTAL # OF DEATHS			0	0	0	0
TOTAL # OF CASES WITH DAYS AWAY FROM WORK			0	0	0	0
TOTAL # OF CASES WITH JOB TRANSFER/RESTRICTION			0	0	0	0
TOTAL # OF OTHER RECORDABLE CASES			0	0	0	0
TOTAL # OF DAYS AWAY FROM WORK			36	36	0	0
TOTAL # OF DAYS OF JOB TRANSFER/RESTRICTION			6	6	0	0
TOTAL # OF INJURIES			0	0	0	0

APPENDIX E – DEMAND RESPONSE PRODUCTIVITY REPORT



Productivity Comparison Report - VRT

For Date Range: 1/1/2016 - 1/9/2016

Printed: 1/14/2016 8:06:57PM

Boise - Vehicle: - 301																
	Passenger Counts				Trip Counts			Hours					Distance (Miles)			
	CLI	Guests	Attns	Total	Trips	NS	Cancels	Service	Revenue	DH	Pax/SH	Pax/RH	Service	Revenue	Pax/SM	Pax/RM
Comparison For: Vehicle: - 301																
Scheduled	66	0	9	75	66	N/A	0	43	41	3	1.73	1.85	516	450	0.15	0.17
Actual	61	1	5	67	61	1	7	45	30	15	1.49	2.26	522	393	0.13	0.17
Boise - Vehicle: - 302																
	Passenger Counts				Trip Counts			Hours					Distance (Miles)			
	CLI	Guests	Attns	Total	Trips	NS	Cancels	Service	Revenue	DH	Pax/SH	Pax/RH	Service	Revenue	Pax/SM	Pax/RM
Comparison For: Vehicle: - 302																
Scheduled	26	0	5	31	26	N/A	0	21	18	3	1.50	1.71	215	167	0.14	0.19
Actual	39	0	5	44	39	2	5	28	18	10	1.56	2.40	329	240	0.13	0.18
Boise - Vehicle: - 311																
	Passenger Counts				Trip Counts			Hours					Distance (Miles)			
	CLI	Guests	Attns	Total	Trips	NS	Cancels	Service	Revenue	DH	Pax/SH	Pax/RH	Service	Revenue	Pax/SM	Pax/RM
Comparison For: Vehicle: - 311																
Scheduled	92	1	3	96	92	N/A	0	53	49	4	1.81	1.95	565	483	0.17	0.20
Actual	79	0	3	82	79	5	12	48	31	18	1.70	2.67	587	432	0.14	0.19
Boise - Vehicle: - 312																

APPENDIX F – DEMAND RESPONSE ON TIME PERFORMANCE REPORT



On Time Performance - VRT

For Time Period: 1/30/2016 - 1/30/2016

Printed: 2/2/2016 9:22:38AM

Grouped by:

Service

LATE

On Time

EARLY

Date	>30	26-30	21-25	16-20	11-15	6-10	1-5		1-5	6-10	11-15	16-20	21-25	26-30	>30	Total Trips	Late Trips	% Late	Early Trips	% Early
ADA Boise																				
<u>Dropoff</u>																				
1/30/2016	0	0	0	0	0	0	0	0	2	1	1	1	1	1	3	10	0	0	10	100.0
<u>Dropoff</u>																				
	0	0	0	0	0	0	0	0	2	1	1	1	1	1	3	10	0	0	10	100.0
<u>Pickup</u>																				
1/30/2016	0	0	0	0	0	0	0	15	13	1	4	1	0	1	2	37	0	0	22	59.5
<u>Pickup</u>																				
	0	0	0	0	0	0	0	15	13	1	4	1	0	1	2	37	0	0	22	59.5
<u>Totals for: ADA Boise</u>																				
	0	0	0	0	0	0	0	15	15	2	5	2	1	2	5	47	0	0	32	68.1
Totals	0	0	0	0	0	0	0	15	15	2	5	2	1	2	5	47	0	0.00	32	68.09
Percent	0.00	0.00	0.00	0.00	0.00	0.00	0.00	31.91	31.90	4.30	10.60	4.30	2.10	4.30	10.60					



APPENDIX G: MAP OF SAFETY SENSITIVE EMPLOYEES

ADA COUNTY SERVICES

- Admin - N/A
- Operation
 - Operator
 - Dispatchers
- Maintenance
 - Mechanics
 - Fuelers/ Cleaner
 - Maintenance Manager

CANYON COUNTY SERVICES

- Admin - N/A
- Operation
 - Operator
 - Dispatchers
- Maintenance
 - Mechanics
 - Fueler/ Cleaner
 - Maintenance Manager

MOBILITY PROGRAM SERVICES

- Admin - N/A
- Operation
 - Pro People Employer Operators, Village Van Operators, AOS Providers
- Maintenance

FACILITY CONTRACTORS

- Fuel Island Inspection, Lift Inspection, Garage Doors

VEHICLE / SERVICE CONTRACTORS

- Tires (Ex: Good Year, New Flyer), Vehicle PM Sub Contractors (Ex: Lithia Ford, Cummins, Gillig and New Flyer), Vehicle Fire Equipement Inspection, Trinity (Mobility), Extra Mile (Mobility)

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APPENDIX H- ANNUAL OPERATIONS OVERSIGHT CALENDAR

Monthly						
OPERATIONS	REQUIREMENT	RESPONSIBLE	APPLICABLE			
		Dept	AC	CC	VRT	Oversight
MONTHLY REPORT	Goals included within report	OPS DIRECTOR	Y	Y	Y	Report
OPERATOR LOG IN (ROUTE MATCH)	100% log in for tablet devices	OPS DIRECTOR	Y	Y		Report
INJURY ACCIDENT REPORT	see safety reporting goals	OPS DIRECTOR	Y	Y		Report
RIDERSHIP/MILES/HOURS/REVENUE	Ridership by revenue miles & revenue hours reporting	OPS DIRECTOR	Y	Y		Report
VALID COMPLAINTS	Resolves complaints	OPS DIRECTOR	Y	Y		Report
DR /FR - OTP	Time Checks	OPS DIRECTOR	Y	Y		Report

VEHICLE MAINTENANCE	REQUIREMENT	Dept	AC	CC	VRT	Oversight
PM ON TIME PERFORMANCE		OPS MANAGER	Y	Y		Report
MILES PER ROAD CALL		OPS MANAGER	Y	Y		Report
		OPS MANAGER	Y	Y		Report

COMPLIANCE	REQUIREMENT	Dept	AC	CC	VRT	Oversight
ADA COMPLAINTS	ADA complaints report	OPS DIRECTOR	Y	Y	Y	Report
	0 Trip Denials	OPS DIRECTOR	Y	Y	Y	Report
DBE		FINANCE DIRECTOR	Y	Y	Y	Report
		FINANCE DIRECTOR	Y	Y	Y	Report
EEO		OPS DIRECTOR	Y	Y	Y	Report
		OPS DIRECTOR	Y	Y	Y	Report
Drug and Alcohol		OPS DIRECTOR	Y	Y	Y	Report

CUSTOMER SERVICE	REQUIREMENT	Dept	AC	CC	VRT	Oversight
CALL WAIT TIMES		OPS MGR	N	N	Y	Report
CALLS TAKEN REPORT		OPS MGR	N	N	Y	Report
RESERVATIONS TAKEN REPORT		OPS MGR	N	N	Y	Report
ELIGIBILITY REPORTING		OPS MGR	N	N	Y	Report
REASONABLE ACCOMODATION		OPS MGR	N	N	Y	Report
		OPS MGR	N	N	Y	Report

QUATERLY

OPERATIONS	REQUIREMENT	Dept	AC	CC	VRT	Oversight
NTD REPORTING	S - 10 - REPORT - Agencies report service supplied and consumed on the Service form (S-10)	OPS DIRECTOR	Y	Y		Report
	Safety and Security - 40: Major Even Reporting. The Major Event Report form (S&S-40) is designed to capture detailed information on the most severe safety and security incidents occurring in the transit environment. Detailed data, available from sources such as accident, incident, or police reports, are used to complete the Major Event Report form (S&S-40). One form is completed for each major incident that occurs at an agency. The information required on the form is intended to be of a level that can be collected within 30 days of the event occurrence	OPS DIRECTOR	Y	Y		Report
	Safety and Security 50: - Non Major - Reportable Event Form	OPS DIRECTOR	Y	Y		Report
	Vehicles Operated in Maximum Capacity	OPS DIRECTOR	Y	Y		Report
	Vehicles available in maximum capacity	OPS DIRECTOR	Y	Y		Report
	MR - 10 - Ridership Activity"	OPS DIRECTOR	Y	Y		Report
	MR - 20 - Service Provided	OPS DIRECTOR	Y	Y		Report
	R - 10 - Employees Form: Agencies report data on transit employees at year end and total hours worked during the year on the Employees form	OPS DIRECTOR	Y	Y		Report
	R - 20 - Maintenance Performance Form	OPS DIRECTOR	Y	Y		Report
	A - 30 - Revenue Vehicle Inventory Form: Agencies report data on revenue vehicles at their fiscal year end on the Revenue Vehicle	OPS DIRECTOR	Y	Y		Report

Inventory form (A-30) by mode and TOS

MAINTENANCE	REQUIREMENT	Dept	AC	CC	VRT	Oversight
PM ON TIME PERFORMANCE		OPS MANAGER				Report
MILES PER ROAD CALL		OPS MANAGER				Report

COMPLIANCE	REQUIREMENT	Dept	AC	CC	VRT	Oversight
ADA COMPLAINTS	ADA complaints report	OPS DIRECTOR	Y	Y	Y	Report
	0 Trip Denials	OPS DIRECTOR	Y	Y	Y	Report
DBE	Meet organization goals stated within the	FINANCE DIRECTOR	Y	Y	Y	On-Site
EEO		OPS DIRECTOR				
Title VI	Completed Training	MOBILITY MGR	Y	Y	Y	On-Site
	Able to demonstrate the practice	MOBILITY MGR	Y	Y		On-Site
Drug and Alcohol	25% and 10%	OPS DIRECTOR	Y	Y	Y	Report

CUSTOMER SERVICE	REQUIREMENT	Dept	AC	CC	VRT	Oversight
NTD SAMPLING	Does VRT have a sampling plan per Circular 2710.1A	OPS MANAGER			Y	On-Site
NEGOTIATED TRIPS		OPS MANAGER			Y	On-Site
AUDITED CALLS		OPS MANAGER			Y	On-Site
EXCESSIVE TRIP AUDIT		OPS MANAGER			Y	On-Site
OTP PERFORMANCE COMPLAINTS		OPS MANAGER			Y	On-Site

ANNUAL

OPERATIONS	REQUIREMENT	Dept	A C	C C	VR T	Oversight
ANNUAL PERFROMANCE REPORT	Summary data reporting for previous year	OPS DIRECTOR	Y	Y	N	On-Site
OSHA REQUIREMENTS	Bloodborne Pathogens Exposure Control Plan (29 CFR 1910.1030©)	OPS DIRECTOR	Y	Y	N	On-Site
	Lockout/Tagout (29 CFR 1910.147)	OPS DIRECTOR	Y	Y	N	On-Site
	Personal Protective Equipment (29 CFR 1910.132)	OPS DIRECTOR	Y	Y	N	On-Site
	Hearing Conservation 29 CFR 1910.95 (Training or plann documentation)	OPS DIRECTOR	Y	Y	N	On-Site
	Powered Industrial Trucks 29 CFR 1910.178 (CNG powered forklift training)	OPS DIRECTOR	Y	Y	N	On-Site
	First Aid (CPR 29 CFR 1910.151)	OPS DIRECTOR	Y	Y	N	On-Site
	Electrical (29 CFR 1910.303)	OPS DIRECTOR	Y	Y	N	On-Site
	Machine Guarding (29 CFR 1910.212)	OPS DIRECTOR	Y	Y	N	On-Site
	Fire Extinguishers Audit (29 CFR 1910.157)	OPS DIRECTOR	Y	Y	N	On-Site
	Permit-Required Confined Spaces, 29 CFR 1910.146 if applicable	OPS DIRECTOR	Y	Y	N	On-Site
	Accident Prevention (Safety Meetings)	OPS DIRECTOR	Y	Y	N	On-Site
	OSHA Ergonomics [Ergonomics Training]	OPS DIRECTOR	Y	Y	N	On-Site
	Lifts Jacks, Stands, Jpost and Pits (Training/Certified Contractor)	OPS DIRECTOR	Y	Y	N	On-Site
	Hassardous Communication Plan 29 CFR 1910.1200(e)	OPS DIRECTOR	Y	Y	N	On-Site

	Emergency Action Plan (29 CFR 1910.38)	OPS DIRECTOR	Y	Y	N	On-Site
	300 LOG (Up to date)	OPS DIRECTOR	Y	Y	N	On-Site
FACILITY AND SHOP INSPECTION	Are Monthly Facility checklist being completed as scheduled	OPS DIRECTOR	Y	Y	N	On-Site
NTD REPORTING	A30 - Vehicle Report	OPS DIRECTOR	Y	Y	Y	On-Site
	S-10 Report	OPS DIRECTOR	Y	Y	Y	On-Site
	SS-40 Safety and Security Report	OPS DIRECTOR	Y	Y	Y	On-Site
SAFETY AND SECURITY	Site specific security program	OPS DIRECTOR	Y	Y	Y	On-Site
EEO REPORTS	Annual Reporting compliance	OPS DIRECTOR	Y	Y		On-Site

MAINTENANCE	REQUIREMENT	Dept	A C	C C	VR T	Oversight
PM ON TIME PERFORMANCE		OPS MANAGER	Y	Y	Y	Report
MILES PER ROAD CALL		OPS MANAGER	Y	Y	Y	Report

COMPLAINE	REQUIREMENT	Dept	A C	C C	VR T	Oversight
DRUG AND ALCOHOL REPORTING	MIS REPORTING INFO	OPS DIRECTOR	Y	Y	N	On-Site
OSHA REQUIREMENTS	Bloodborne Pathogens Exposure Control Plan (29 CFR 1910.1030©)	OPS DIRECTOR	Y	Y	N	On-Site
	Lockout/Tagout (29 CFR 1910.147)	OPS DIRECTOR	Y	Y	N	On-Site
	Personal Protective Equipment (29 CFR 1910.132)	OPS DIRECTOR	Y	Y	N	On-Site
	Hearing Conservation 29 CFR 1910.95 (Training or plann documentation)	OPS DIRECTOR	Y	Y	N	On-Site

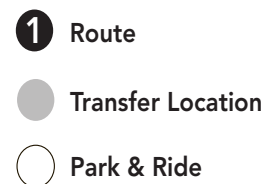
	Powered Industrial Trucks 29 CFR 1910.178 (CNG powered forklift training)	OPS DIRECTOR	Y	Y	N	On-Site
	First Aid (CPR 29 CFR 1910.151)	OPS DIRECTOR	Y	Y	N	On-Site
	Electrical (29 CFR 1910.303)	OPS DIRECTOR	Y	Y	N	On-Site
	Machine Guarding (29 CFR 1910.212)	OPS DIRECTOR	Y	Y	N	On-Site
	Fire Extinguishers Audit (29 CFR 1910.157)	OPS DIRECTOR	Y	Y	N	On-Site
	Permit-Required Confined Spaces, 29 CFR 1910.146 if applicable	OPS DIRECTOR	Y	Y	N	On-Site
	Accident Prevention (Safety Meetings)	OPS DIRECTOR	Y	Y	N	On-Site
	OSHA Ergonomics [Ergonomics Training]	OPS DIRECTOR	Y	Y	N	On-Site
	Lifts Jacks, Stands, Jpost and Pits (Training/Certified Contractor)	OPS DIRECTOR	Y	Y	N	On-Site
	Hassardous Communication Plan 29 CFR 1910.1200(e)	OPS DIRECTOR	Y	Y	N	On-Site
	Emergency Action Plan (29 CFR 1910.38)	OPS DIRECTOR	Y	Y	N	On-Site
	300 LOG (Up to date)	OPS DIRECTOR	Y	Y	N	On-Site
FACILITY AND SHOP INSPECTION	Are Monthly Facility checklist being completed as scheduled	OPS DIRECTOR	Y	Y	N	On-Site

CUSTOMER SERVICE	REQUIREMENT	Dept	A C	C C	VR T	Oversight
NTD SAMPLING	Does VRT have a smapling plan per Circular 2710.1A	OPS MANAGER	N	N	Y	On-Site
NEGOTIATED TRIPS	report on negotiated trips	OPS MANAGER	N	N	Y	On-Site
AUDITED CALLS	how many QA checks were completed	OPS MANAGER	N	N	Y	On-Site
EXCESSIVE TRIP AUDIT	Analysis of perfomance and corrective actions measures	OPS MANAGER	N	N	Y	On-Site
ADA COMPLAINTS		OPS MANAGER	N	N	Y	On-Site



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Meridian, and Nampa

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Attachment K: Title VI Equity Analysis Required Documents

The following documents are available for review upon request:

- **Project Flow Diagram**
- **VRT Pass Through Funding Notes**
- **VRT Pass Through Funding Notes Narrative**
- **Sub recipient's Funding Requirements Checklist**
- **VRT Example Payroll Tracking Sheet**
- **Example Site Criteria Spreadsheet**
- **Example Project Closeout Letter**