

Mid-Ohio Regional Planning Commission  
Program Management Plan for  
Enhanced Mobility of Seniors and Individuals with Disabilities  
FTA Section 5310 Program



Mid-Ohio Regional Planning Commission  
Transportation Systems and Funding

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## **Purpose**

The Program Management Plan (PMP) is intended to facilitate both recipient management and FTA oversight by documenting the Mid-Ohio Regional Planning Commission's (MORPC) (the designated recipient) procedures and policies for administering the Section 5310 program for the Columbus Ohio Urbanized Area (UZA).

This document includes MORPC's program objectives, policies, procedures, and administrative requirements, in a form readily accessible to potential sub-recipients, recipient staff, FTA, and the public. The PMP's primary purposes is to serve as the basis for FTA to perform recipient-level management reviews of the program, and to provide public information on the recipient's administration of the Section 5310 program. It may also be used internally by the recipient as a program guide for local project applicants.

## **Management Plan Review**

FTA conducts oversight reviews to examine each designated recipient's management procedures, and the relationship of the procedures to its management plan. When a triennial review is scheduled, FTA and its contractors examine the PMP on file as part of a desk review at the regional office to determine whether the procedures in the PMP satisfy current requirements. At a site visit, the reviewers document whether or not the designated recipient is following its own stated procedures.

## **Management Plan Content**

While there is no prescribed format for the PMP, the plan is required to address and provide information on the following topics below.

## A. Program Goals and Objectives

Title 49 U.S.C. 5310 authorizes formula assistance to enhance the mobility of seniors and individuals with disabilities by providing formula funding to states and designated recipients. FTA refers to this formula program as “the Section 5310 program.” Funds authorized by 49 U.S.C. 5310 are subject to annual appropriations.

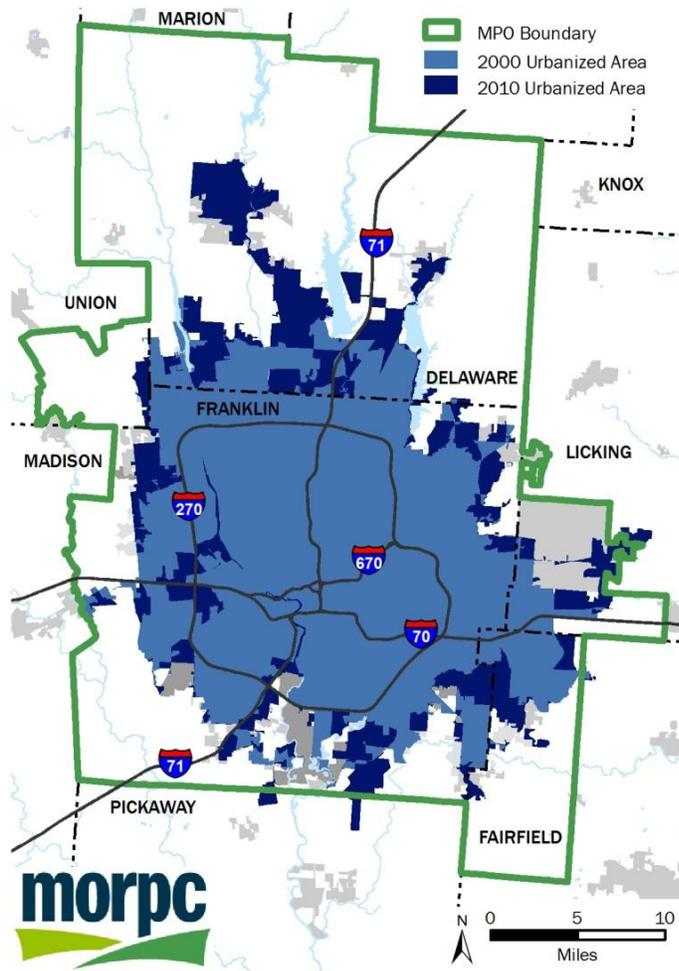
The goal of the Section 5310 Program is to improve mobility for seniors and individuals with disabilities by removing barriers to transportation services and expanding the transportation mobility options available to them. To meet this goal, the Section 5310 program provides financial assistance for capital and operating projects that are public transportation projects planned, designed, and carried out to meet the special needs of seniors and individuals with disabilities when public transportation is insufficient, inappropriate, or unavailable and projects that exceed the requirement of the ADA, improve access to fixed-route service and decrease reliance by individuals with disabilities on complementary paratransit, and alternatives to public transportation that assist seniors and individuals with disabilities.

This program provides funding to increase access to the community with transportation options through coordination, expansion of efforts and resources of public transportation agencies, human services agencies and private providers of public transportation services.

- Public transportation projects planned, designed, and carried out to meet the special needs of seniors and individuals with disabilities when public transportation is insufficient, inappropriate, or unavailable.
- Public transportation projects that exceed the requirements of the Americans with Disabilities Act (ADA) of 1990 (42 U.S.C. 12101 et seq.).
- Public transportation projects that improve access to fixed-route service and decreased reliance on complementary paratransit.
- Alternatives to public transportation projects that assist seniors and individuals with disabilities with transportation.

Under MAP-21 this program no longer provides a single apportionment to each state; it now provides apportionments specifically for large urbanized, small urbanized and rural areas, and requires designations of recipients in large UZAs. Consistent with the type of projects eligible under the former New Freedom program, MAP-21 expanded the eligible activities to include operating expenses.

MORPC’s objective is to build upon and strengthen the partnerships among federal, state, regional, local, and private sector public transportation entities to improve public transportation planning, coordination, access, safety and delivery of service.



All projects selected through this program will be derived from locally developed Coordinated Public Transit – Human Service Transportation Plans (Coordinated Plans) in the Columbus, Ohio UZA. Currently the UZA has two Coordinated Plans - one for each county - Franklin and Delaware. The Franklin County Coordinated Plan is from an urban perspective and Delaware’s is rural. After the 2010 Census the Columbus, Ohio UZA was expanded to include the urban cluster of the City of Delaware and parts of Delaware County. See map.

Establishing goals for the Section 5310 program is accomplished in MORPC’s Metropolitan Transportation Plan (MTP) and the UZA’s Coordinated Plans. These plans are developed with extensive public involvement that identifies gaps in service and develops strategies for better service, policy coordination and implementation options to improve mobility.

## B. Roles and Responsibilities

In the fall of 2014, the Governor of Ohio designated MORPC as the Section 5310 designated recipient for the Columbus UZA. MORPC will work with FTA to develop and respond to all policy issues. MORPC staff will manage the day-to-day activities of the program, including technical assistance, planning; grant administration and monitoring, including preventive maintenance and vehicles or other program inspections.

MORPC will manage all aspects of the Section 5310 program for the Columbus, Ohio UZA and perform a variety of administrative functions as outlined by FTA in its Enhanced Mobility of Seniors and Individuals with Disabilities program circular FTA C9070.1G.

MORPC will be responsible for notifying eligible local entities of the available funding, developing and administering a funding process, verifying applicant eligibility, developing and forwarding an annual Program of Projects (POP), developing and revising this PMP, certifying that grant distribution is fair and equitable, and certifying that all projects are derived from a Coordinated Plan.

Overseeing the implementation of projects as developed and prioritized in the Coordinated Plan, including, where not specified in the plan, selecting entities to carry

out projects consistent with procedures approved in the Coordinated Plan and/or documented in the designated recipient's PMP.

Certifying a fair and equitable distribution of funds is to be coordinated with other transportation services, and insuring that at least 55 percent of the projects are used for "traditional" Section 5310 projects.

Manage all aspects of grant distribution, including project reporting, oversight, audit and closeout for sub-recipients receiving funds under this program.

## **C. Coordination**

All projects included in the application for the Section 5310 program will be derived from a "Locally Developed Coordinated Public Transit Human Services Transportation Plan" as described in Circular 9070.1G Section V.

The Franklin and Delaware County Coordinated Plans were developed and approved through a process that included participation by seniors, individuals with disabilities, representatives of public, private, nonprofit transportation, human services providers and members of the public. These plans were prepared through a process that is consistent with the applicable metropolitan and statewide planning process.

The Franklin and Delaware County Coordinated Plans have been maintained and included in the region's (MORPC's) MTP. The two locally developed Coordinated Plans - one in an urban area and one in a rural area - will be combined and included in the next update of MORPC's Metropolitan Planning Organization's 2040 MTP in 2016.

## **D. Eligible Sub-recipients**

Eligibility will not be more restrictive than the Federal Eligibility requirements. Eligible recipients (as identified in FTA Circular 9070.1G) for each type are as follows:

- A. Traditional Section 5310 Projects (at least 55% of total Section 5310 funding)
  - 1. Private non-profit organizations
  - 2. A state or local government authority that:
    - a. Is approved by the state to coordinate services for seniors and the disabled
    - b. Certifies that there are no non-profit organizations in the area to provide these services
- B. Non-Traditional Section 5310 Projects (up to 45% of total Section 5310 funding)
  - 1. A state or local government authority unlike those described above
  - 2. Private non-profit organizations
  - 3. Private for-profit organizations – must certify that all funds are used in the provision of shared ride services

## **E. Local Share and Local Funding Requirements**

MORPC will follow federal guidelines for determining eligible local matching share. The local policy will not be more restrictive than the federal policy. All of the local share must

be provided from sources other than Federal Department of Transportation (DOT) funds. Sources include: other non-DOT federal funds, dedicated tax revenues, private donations, and private foundation revenue from human service contracts, net income generated from advertising and concessions.

Project sponsors are responsible for securing the local share commitment, which must be documented with a signed letter of commitment. The grantee is responsible for ensuring that non-DOT federal funds may be used as local match and are eligible to be used in the project. In-kind match will be allowed, but only if the in-kind contribution is an integral part of the proposed project and the value of the match is documented and supported and represents a cost which would otherwise be eligible under the program.

## **F. Project Selection Criteria and Method of Distributing Funds**

In MAP-21 Section 5310 permits, but does not require a competitive selection process. Each year MORPC will determine if funds should be allocated by a competitive selection process with a MORPC sub-committee or if funds should be allocated by MORPC to identified entities to address regional priorities. Projects can be conducted by a Direct Recipient, by an eligible sub-recipient, or through contract with a third party. MORPC could identify the appropriate implementing agency or could develop a Request for Qualifications which would be publicly advertised.

Project selection criteria will be developed based on the guidance provided in MAP-21's circular for Section 5310 and the priorities identified in the Franklin and Delaware County Coordinated Plans. Special emphasis will be placed on evidence of efforts to coordinate transportation services. All projects will be judged by their capacity to improve access to the community for target populations.

The selection process will be open and transparent, and every effort will be made to reach multiple agencies that provide services to the primary target populations, ensuring equity of access to the benefits of the grant programs among eligible groups, as required by Title VI of the Civil Rights Act.

Since the development of the UZA's Coordinated Plans, contacts of interested parties representing all segments of the study area, including advocates for people with disabilities, the elderly and minority populations have been maintained. In addition to mailing announcements and web postings, funding availability will be communicated using MORPC's Transportation Public Involvement Policy (<http://www.morpc.org/pdf/2013TransportationPublicInvolvementPlanUpdate.pdf>).

The selection process will include an application workshop where outlining the development of project applications and criteria will be offered. The workshop will be advertised and offered to all interested applicants. Assistance in developing proposals will be offered to all applicants. Funding requests will be submitted to MORPC. During a competitive selection process projects will be ranked depending on the strength of the proposals and the likely impact of the proposed project on priorities identified in the UZA's Coordinated Plans. Funds will be distributed to adequately fund the highest ranked

project first, and as many other high-ranking projects as possible, in order of their ranking.

## **G. Annual Program of Program of Projects Development and Approval Process**

MORPC will advertise the availability of Section 5310 funding and issue a call for projects to interested public and private entities, the media, individuals, and members and place on MORPC's website.

At the beginning of the cycle a workshop will be held for interested parties to review the application process, eligibility, goals, criteria, timetables, local match guidelines and performance monitoring requirements.- Information will also be available on MORPC's website.

MORPC will review applications received, certify compliance with the UZA's Coordinated Plans and recommend the POP to be placed on MORPC's TIP.

Selected and contingent projects will be listed in a POP and amended to MORPC's Transportation Improvement Program (TIP) by MORPC committee approval. MORPC's Community Advisory Committee (CAC) and Transportation Advisory Committee (TAC) will request recommendation for approval by MORPC's Transportation Policy Committee. Upon MORPC committee approval the POP and TIP/STIP will be amended to Ohio's State Transportation Improvement Program (STIP), and submitted to FTA. Applicants will be concurrently notified if they are included in the submission or were rejected.

## **H. Administration Planning and Technical Assistance**

Up to 10 percent of the apportionments for the Section 5310 program may be used, at a 100 percent federal match, for ongoing technical assistance and administration expenses. MORPC will use a portion of this allocation to pay for staff time and expenses to administer the program and its requirements, and anticipates using up to the 10 percent limit for the following activities:

- Update the Coordinated Plan as needed.
- Develop and update the PMP.
- Share best practices.
- Facilitate meetings among agencies; assist in development of recordkeeping and reporting.
- Work as a partner with transit agencies, other providers and programs on GIS and mapping.
- Providing technical assistance to applicants and sub-recipients.
- Contracting with sub-recipients.
- Grant management, ongoing administration, and monitoring of sub-recipients.

## **I. Transfer of funds**

Following FTA guidance, should any current recipients of the Urbanized Formula Grant Program (Section 5307) apply and be selected, MORPC will allow these recipients the

option of applying directly to FTA for Section 5310 funds. In this event, the direct recipient must enter into a supplemental agreement with MORPC. Section 5310 recipients that elect to become direct recipients will then be responsible for all reporting and certifications. A letter will be sent to inform the FTA regional administrator of any transfer of funds, along with the fiscal year of apportionment, the amount of funds to be transferred, and the selected projects for which they will be used.

A signed memorandum of understanding will be provided to Section 5307 recipients detailing the roles and responsibilities of each party. MORPC will write a letter to FTA listing the names of the projects approved, with the amount and type of funding approve including the match and total project cost. The letter will also indicate whether projects can be applied to the required 55% devoted to "traditional" Section 5310 projects. Each Section 5307 applicant that chooses to apply directly to FTA will be required to attach this letter to their applicant in TEAM.

## **J. Private Sector Participation**

Private providers of public transportation services and employers are invited to participate in the coordinated planning process through direct mail; advertisements, public notices and advertisements in area newspapers, and these participants will be among the many stakeholders that will be contacted for the Section 5310 call for applications. MORPC's public involvement policy provides the opportunity for continuing involvement throughout transportation planning and programming process. (in F above)

## **K. Civil Rights**

MORPC will comply with regulations to the end that no person shall, on the ground of race, color, sex, age, creed, handicap, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program from employment or activity for which it receives federal financial assistance either directly or indirectly from the federal departments, and other federal, state and local government sources as well as any and all national, regional, and local private funds; and hereby gives assurance that it will in all phases and levels of program and activities, act affirmatively to achieve equal opportunities for participation by actively seeking out qualified people for due consideration for availability and job opportunities and encouraging the involvement of the socially and/or physically disadvantaged population in all phases of the program.

Each applicant is required as part of its Section 5310 application to provide information relating to the clientele to be served by the project, including the number of minority individuals broken down by Black, Hispanic, Asian or Pacific Islander, Native American, and Asian-Indian population groups. A process will be developed to solicit any complains based on perceived discrimination based on race, color, or national origin

Additionally, each applicant is required to certify compliance to MORPC concerning a number of assurances including:

- 1) Equal Employment Opportunity;

- 2) Nondiscrimination on the Basis of Disability;
- 3) Disadvantaged Business Enterprises Program; and
- 4) Compliance with Title VI of the Civil Rights Act of 1964, as amended
- 5) Limited English Proficiency Requirement

## **L. Section 504 and ADA Reporting**

MORPC agrees to comply with the requirements of 49 U.S.C. §5301 (d) which state the federal policy that elderly individuals and individuals with disabilities have the same right as other individuals to use public transportation services and facilities, and that special efforts will be made in planning and designing those services and facilities to implement transportation accessibility rights for elderly individuals and individuals with disabilities. MORPC will monitor sub-recipients first by requiring a signed agreement outlining the expectations for sub-recipients regarding Section 504 and ADA reporting. In the case of Section 5307 recipients who apply directly for Section 5310 and funds, those agencies have the appropriate ADA-related policies and procedures

MORPC will require demographic information, including disability status of riders on quarterly project reports. Sub-recipients will be asked to report all project measures in a manner to include both a disability and an ethnic breakdown of the population served. MORPC has a process to solicit any complaints based on perceived discrimination based on disability status.

## **M. Program Measures**

The reporting and data collection measures for the Section 5310 Program will be prescribed in the grant agreements with sub-recipients to collect the following specific data:

- Services provided that impact the availability of transportation services for individuals with disabilities as a result of the Section 5310 projects implemented in the current reporting year. Examples include geographic coverage, service quality, or service times.
- Number of calls for information about transportation for elderly individuals and individuals with disabilities, and the actual or estimated successful referrals of those calls will be requested.
- Additions or changes to the environmental infrastructure (e.g., transportation facilities, sidewalks, etc.) technology, or vehicles that impact the availability of transportation services as a result of Section 5310 projects implemented in the current reporting year.
- Actual or estimated number of rides (as measured by one-way trips) provided for individuals with disabilities or seniors as a result of the projects implemented in the current reporting year.

## **N. Designated Recipient Program Management**

MORPC has assigned a staff person as project manager for its PMP. This staff person, or designee, will be responsible for reviewing and processing all reports, plans and certifications required to be submitted under these regulations. MORPC will review information provided by the sub-recipients of Section 5310 funds on a quarterly basis, at a minimum. A quarterly progress report form will be developed to document the program measures for the Section 5310 program as enumerated (in M) above.

All reporting and financial transactions will be managed through FTA's Transit Award and Management System (TRAMS) and Electronic Clearing House Operation Web (ECHO-Web) systems. Any transit agency receiving Section 5307 funds that is awarded Section 5310 funds may opt to become a direct recipient of these grants by completing the supplemental agreement in TRAMS, and will be responsible for all project grant management; MORPC will be released from any liability pertaining to direct recipient grants.

MORPC will develop and execute grant sub-agreements with each sub-recipient selected to receive funding from the Section 5310 program detailing reporting requirements and containing all applicable certifications and assurances. The amount, type (capital or operating) and time period of the funding award will be included in this contract; any expenses incurred in excess of the budgeted amounts are the sole responsibility of the sub-recipient and are not eligible for reimbursement.

The program manager, or designee, will establish and maintain a point of contact with each sub-recipient and will monitor compliance through review of required quarterly reports, plans, certifications, correspondence, telephone inquiries and periodic site visits required by FTA. When the sub-recipient is a Section 5307 Direct Recipient, many of the required FTA monitoring safeguards will be in place at the Direct Recipient level and will be utilized to monitor compliance.

### **Accounting Systems, Financial Management & Reporting**

MORPC has an established accounting and reporting system that meets FTA requirements for financial management. In addition, all sub-recipients must assure MORPC that each has fiscal control and accounting procedures that will permit preparation of the required reports as well as a level of expenditures adequate to establish that such funds are used consistent with the rules and requirements of the program. These systems will also allow for the accurate, current, and complete disclosure of all financially assisted activities, the establishment and maintenance of accounting records which are supported by source documents and which adequately identify the source and application of funds provided, the effective control and accountability of cash, real and personal property, and other assets; the comparison of actual expenditures with budgeted amounts, allowing for the development of performance or productivity data and unit cost information, where appropriate; the application of OMB cost principles, agency program regulations, and the terms of sub-recipient's grant agreement to determine the reasonableness, allow ability, allocation

ability of costs; and a procedure for minimizing the time elapsing between the receipt of Federal funds and local disbursement.

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

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

### **Procurement, Property Management, Vehicle Use, Maintenance and Disposition**

Sub-recipients including MORPC will be required to certify compliance with all federal requirements for fair and open competitive procurement processes, including 49 CFR 18.36 and FTA Circular 4220.1E, "Third-Party Contracting Requirements." Equipment purchases may be conducted directly by the sub-recipient, with MORPC oversight and prior written authorization, or through an existing term contract through another governmental agency or ODOT, if eligible.

The FTA requirements and standards apply to the procurement of all supplies, equipment, and services funded by FTA. Prior to entering into any third sub-agreement, lease, or third party contract, sub-recipients must review the "Excluded Parties Listing System" at <http://epls.gov/>.

MORPC will inspect all vehicles, programs, and infrastructure every three years, and develop and maintain an inventory of all assets. Along with the onsite inspections, each agency's maintenance procedures and practices will be reviewed. Recommendations are made as needed and a follow-up is scheduled if conditions warrant. MORPC is committed to a policy of encouraging good preventive maintenance practices. All grantees and other programs will be encouraged to use a preventive maintenance schedule.

All Section 5310 vehicle sub-recipients must submit a semi-annual monitoring report to MORPC. This report is required until MORPC grants vehicle disposition. Report information is compiled and reviewed periodically to determine if the vehicle, program or projects are being fully utilized. Any sub-recipient determined to underutilize funds is noted and will be contacted to correct any issues. .

MORPC will approve disposition of a vehicle or other equipment when the useful life standards have been met for that particular item or prior to useful life if extraordinary circumstances are involved. All requests for disposition must be made in writing.

## **Reporting, Audits, and Closeouts**

Sub-recipients receiving greater than \$500,000 annually in federal funding are responsible for obtaining annual audits at either the grant or organization level that are consistent with the requirements of OMB Circular A-133. A copy of this audit must be submitted to MORPC, and any audit findings must be resolved by the sub-recipient. If a sub-recipient receives other federal funding in addition to Section 5310 an A-133 must be done and submitted to MORPC.

Vehicle and operating reports are to be quarterly. Data collected include mileage, number of days vehicles are operated, one-way trips for elderly, disabled, and other categories of passengers, condition rating of the vehicle, and maintenance, accident and training information.

Mobility Management Reports are to be submitted quarterly. Data collected relate to the program measures and will be customized based on the Mobility Management Project.

MORPC will submit reports to FTA from the time of grant approval until all eligible program expenses have been reimbursed. Project closeouts are conducted in accordance with FTA guidance.

## **O. Other Provisions**

While MORPC will be the Designated Recipient of funds, it does not operate vehicles or provide direct transportation service. In approving grants to sub-recipients, MORPC will require certifications and assurances from sub-recipients that they will comply with other federal requirements such as environmental protection, Buy America provisions, pre-award and post-delivery reviews, restrictions on lobbying, prohibition on exclusive school transportation, and drug and alcohol testing, as appropriate. Depending on the nature of the project, MORPC will require reporting on the relevant actions taken to comply with the federal requirements listed above as part of quarterly reporting.

In cases when selected project involves a Direct Recipient of FTA funds, that entity will apply for funds directly and monitor the project. Those agencies are familiar with and in compliance with FTA requirements as part of the Section 5307 process.