PROGRAM MANAGEMENT PLAN

FOR THE ADMINISTRATION OF FEDERAL TRANSIT ADMINISTRATION (FTA) SECTION 5310 PROGRAM

Prepared by:
Utah Transit Authority
Grants Department
Coordinated Mobility Division

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DRAFT#2 10/10/2025

Commented [AL1]: Change Revision History - Please add the 2018 document I provided on 9/16/2025 to the revision history

Commented [DW2R1]: Updated to incorporate the original 2015 document and revision 1 from 2020.

Federal Programs Overview

The Utah Transit Authority (UTA) administers the Federal Transit Administration (FTA) program for public and specialized transportation for Utah's large, urbanized areas including Ogden/Layton, Salt Lake, and Provo/Orem.

The Program Management Plan (PMP) describes the policies for the **only FTA program that UTA administers to subrecipients**:

- Enhanced Mobility of Seniors and Individuals with Disabilities Program (Section 5310) provides formula funding to improve accessibility and mobility for seniors and individuals with disabilities.

For consistency in describing FTA programs that UTA administers and for which FTA requires a PMP, UTA also acknowledges it also receives funds under the below program:

- Buses and Bus Facilities Program (Section 5339) provides formula and competitive funding to states and direct recipients to replace, rehabilitate, and purchase buses and related equipment and to construct bus-related facilities, including technological changes or innovations to modify low or no emission vehicles or facilities.

    o UTA does not pass through 5339 funds to subrecipients. Because UTA is the sole direct recipient and user of these funds, this PMP does not address Section 5339.

Commented [AL3]: Tracy: BW suggested we add this to let FTA reviewers know we receive 5339 but do not pass through, so they wont ask us questions assuming we pass trhough 5339

Commented [TY4R3]: I'm still unsure why we would be questioned on this? As a Transit Agency that is a designated recipient we only use 5339 for UTA use. I could see this being included if there were other transit providers in the area but UTA is the only one and therefore the only other 5339 funds that can be distributed is for the small urban and rural areas which is administered by UDOT. I would like to remove this unless BWS think it could still be questioned??

Commented [DW5R3]: Alika to update

Commented [AL6R3]: I have updated this section to be more clear, while still meeting the consistency of formatting that Diane wants. Please let me know if you think this reads in a more clear way so the reader will not miss that the PMP only governs 5310.

Commented [TY7R3]: That's great!

Table of Acronyms

Acronyms	Definitions
ACFR	Annual Comprehensive Financial Reports
ADA	Americans with Disabilities Act
BRAG	Bear River Association of Governments
CAA	Clean Air Act
CAFR	Comprehensive Annual Financial Report
CAP	Corrective Action Plan
CDL	Commercial Driver's License
CFR	Code of Federal Regulations
CMV	Commercial Motor Vehicle
COI	Certificate of Insurance
DBE	Disadvantaged Business Enterprise
EEO	Equal Employment Opportunity
EEOC	Equal Employment Opportunity Commission
ERP	Enterprise Resource Planning
FAC	Federal Audit Clearinghouse
FFATA	Federal Funding Accountability and Transparency Act
FFR	Federal Financial Report
FHWA	Federal Highway Administration
FMCSA	Federal Motor Carrier Safety Administration
FTA	Federal Transit Administration
FSRS	Subaward Reporting System
GAAP	Generally Accepted Accounting Principles
GMAT	Grant Management Advisory Team
HAZMAT	Hazardous Materials
LCC	Local Coordinating Council
MAP-21	Moving Ahead for Progress in the 21st Century
MAG	Mountainland Association of Governments
MPO	Metropolitan Planning Organization
MPR	Milestone Progress Report

Acronyms	Definitions
MTDC	Modified Total Direct Costs
NTD	National Transit Database
OMB	Office of Management and Budget
PMP	Program Management Plan
POP	Program of Projects
PTASP	Public Transportation Agency Safety Plan
SAM	System of Award Management
SB	Senate Bill
SF-LLL	Standard Form LLL (Lobbying Disclosure Form)
STIP	State Transportation Improvement Program
TAM	Transit Asset Management
TIP	Transportation Improvement Program
UEI	Unique Entity Identifier
USC	United States Code
USDOT	United States Department of Transportation
UTA	Utah Transit Authority
UZA	Urbanized Area
WFRC	Wasatch Front Regional Council

DRAFT#2, 10/10/2025

UTA's Roles and Responsibilities

UTA is responsible for developing and maintaining a PMP that outlines its policies and procedures for administering the FTA Section 5310 Enhanced Mobility of Seniors and Individuals with Disabilities program. As the Designated Recipient for Utah's three large urbanized areas, 1) Salt Lake, 2) Ogden–Layton, and 3) Provo–Orem, UTA is required to maintain an approved PMP on file with the FTA regional office.

UTA's overarching responsibilities include administering, managing, and programming Section 5310 funds and selecting and monitoring subrecipients and projects. In fulfilling these responsibilities, UTA ensures that:
- All eligible applicants have a fair and equitable opportunity to apply for funding
- The review and selection process includes a determination that:
  - All selected subrecipients comply with Federal, State, and UTA grant requirements
  - Proposed projects
    - Align with applicable Coordinated Public Transit–Human Services Transportation Plans (Coordinated Plans)
    - Are eligible under Section 5310 program requirements

Overview of the Coordinated Mobility Division

The Coordinated Mobility Division, housed within UTA's Grants Department, is responsible for the administration of the FTA Section 5310 program. This Division was formally established as a result of Utah Senate Bill 136 (SB 136), passed in 2018 under former Governor Gary Herbert. SB 136 mandates that UTA maintain a dedicated coordinated mobility function to improve collaboration, efficiency, and service delivery among transportation providers serving Utah's large urbanized areas.

The Division plays a vital role in enhancing transportation access for individuals with disabilities, aging adults, and other disadvantaged groups. Key responsibilities of the division include:
- Facilitating interagency partnerships and Local Coordinating Councils (LCCs)
- Managing community-based transportation programs and resources
- Overseeing the Donated Vehicle Program
- Providing technical assistance and training to nonprofit and public transportation providers
- Coordinating mobility management services, referral programs, and technology solutions
- Ensuring alignment with Coordinated Plans across the region

The Division plays a vital role in fulfilling both federal and state mandates to support accessible, equitable, and coordinated transportation options throughout Utah's large urbanized areas.

PMP Development and Update

FTA requires the PMP to be updated, as necessary, to reflect significant changes in program administration, local procedures, or federal requirements. When substantial revisions are made, UTA provides an opportunity for stakeholder input, including subrecipients, metropolitan planning organization (MPO) partners, LCCs, and members of the public. Minor technical edits or updates that do not alter the intent or structure of the PMP may be submitted to FTA without formal stakeholder review. The PMP is intended to:

- Articulate UTA's program objectives, selection criteria, compliance approach, and administrative policies
- Provide transparency to applicants and stakeholders regarding UTA's management of the FTA program
- Support FTA's oversight through triennial and other management reviews
- Serve as a resource for UTA staff and subrecipients in understanding roles, responsibilities, and program expectations
- Guide local project applicants through the framework under which projects are selected, funded, and monitored.

This PMP is supplemented by program procedures that outline in detail how UTA implements these policies. These documents are available on UTA's website.

Annual Program of Projects (POP) Development and Approval Process

UTA is responsible for developing and approving an annual POP in accordance with FTA Circular 9070.1, Enhanced Mobility of Seniors and Individuals with Disabilities Program Guidance. The POP is a comprehensive list of projects proposed for funding during the program year and must be derived from a fair and equitable competitive selection process.

UTA ensures that all projects included in the POP are consistent with the locally developed Coordinated Plan and align with federal objectives. The POP is developed in collaboration with regional stakeholders, including LCCs and community partners, and reflects the priorities identified through the Coordinated Plan process. Public input is incorporated through these stakeholder engagement efforts during the competitive application cycle and further supported through the inclusion of the final POP in the Transportation Improvement Program (TIP) and Statewide Transportation Improvement Program (STIP). UTA submits awarded projects to Utah Department of Transportation for inclusion in the TIP/STIP process, which provides additional opportunities for public review and comment in accordance with federal planning requirements.

UTA's detailed procedures for the annual Section 5310 application cycle, competitive selection process, and POP development which discusses eligibility criteria, evaluation methodologies, timelines, and document requirements can be found in the Pre-Award Grant Management Guide. The Pre-Award Grant Management Guide may be updated more frequently to be inclusive of changes in local processes and/or federal program requirements. The most current version is publicly available on UTA's website and is referenced in all communications and application materials.

Coordination

Coordination is a core federal and state requirement of the Section 5310 program. UTA coordinates with a broad range of stakeholders to ensure that mobility services for seniors and individuals with disabilities are effectively planned, prioritized, and delivered. Coordination is embedded throughout UTA's Section 5310 program, beginning with the development of Coordinated Plans and continuing through project selection and ongoing oversight of subrecipients.

UTA's coordination responsibilities are also supported by Utah SB 136 (2018), which requires UTA to maintain a Coordinated Mobility Division focused on improving cross-agency collaboration, particularly for individuals with disabilities, older adults, and other underserved populations.

UTA supports coordination at both regional and project levels through structured engagement with planning partners, community organizations, and transportation providers.

Key coordination activities include:
- Participation in the Grant Management Advisory Team (GMAT): A collaborative body composed of UTA staff, MPO representatives, and LCC designees
- Collaboration with the MPOs serving Utah's large urbanized areas including Wasatch Front Regional Council (WFRC), and Mountainland Association of Governments (MAG). Although Bear River Association of Governments (BRAG) is no longer located in a urbanized area, UTA continues to coordinate with the agency as a valued regional partner
- Leadership and facilitation of LCCs' resources in Weber/Davis, Salt Lake, and Utah County, which serve as regional forums to identify transportation needs, coordinate services, and share technical resources
- LCC membership reflects a diverse range of stakeholders, including older adults, individuals with disabilities, human service organizations, transportation providers, and members of the public. Agencies seeking Section 5310 funding are required to participate in their respective LCC as part of UTA's coordination requirements.
- Verification that all proposed projects address the needs, priorities, and goals identified in the Coordinated Plans for each urbanized area

UTA also strongly encourages applicants to coordinate with existing community partners when developing service proposals. These may include other transportation service providers, health and human service organizations, healthcare facilities, nonprofit agencies, for-profit contractors, local governments, and other stakeholders. Collaborative planning and joint project development help ensure program efficiency, reduce duplication of services, and enhance transportation access for target populations. Projects that do not demonstrate alignment with the Coordinated Plan or fail to show meaningful stakeholder coordination will not be considered eligible for funding under the Section 5310 program.

Commented [AL12]: Changed this because MAG has not been a participant in past years

Commented [TY13R12]: Ok

Commented [AL14]: Membership or attendance/attendees?

Private Sector Participation

In accordance with federal requirements, UTA ensures that private transportation providers (including for-profit companies such as taxi operators that provide public transportation) are offered meaningful opportunities to participate in the planning and delivery of services funded through the Section 5310 program. Private sector involvement is encouraged throughout program implementation, including project planning, application development, and service delivery partnerships. Private sector participation is supported through UTA's:

- TIP/STIP public outreach process
- Facilitation of the LCCs which include both public and private members
- Collaboration with MPOs during Coordinated Plan development
- Encouragement of joint service delivery arrangements and referrals among providers

Private for-profit operators, such as taxi companies, are eligible to apply directly for capital funding (e.g. accessible vehicles) under the Section 5310 program, provided they meet all subrecipient requirements. Private companies may also be contracted by eligible subrecipients through purchase-of-service arrangements (also known as third party contracts by FTA). These partnerships help expand service coverage and improve transportation access for seniors and individuals with disabilities. UTA supports all forms of coordination with the private sector that promote cost-effectiveness, reduce duplication of service, and improve outcomes for program participants.

Transit Asset Management (TAM) Plan

UTA complies with the FTA's TAM requirements set by the code of federal regulations (CFR) at 49 CFR Part 625. UTA maintains a TAM Plan as a Tier I provider.

Subrecipients receiving capital assets through the Section 5310 program are considered Tier II providers and are included in the UTA's TAM Plan, as applicable. UTA maintains oversight of all Section 5310-funded vehicles and ensures that asset inventory, condition assessments, and performance measures meet FTA TAM requirements under 49 CFR Part 625.

The official source of record for UTA's capital assets is the Asset Master module within UTA's JD Edwards (JDE) accounting software, UTA's enterprise resource planning and accounting system. This system maintains key asset data such as acquisition costs, useful life benchmarks, funding sources, and current status.

To support the required biennial inventory and condition assessments, UTA's Asset Management team uses ArcGIS Field Maps to physically verify vehicle location, collect condition ratings, and track "found/unfound" status of all vehicles. The collected data is then reconciled with the JDE Asset Master for compliance and reporting purposes. UTA retains lienholder status on all federally-funded vehicles until final disposition.

Commented [AL15]: This is not true, **private for-profit transportation providers (such as taxi companies) are eligible subrecipients** for **capital projects**, including vehicles, as long as they meet the eligibility requirements. However, **only public and nonprofit entities** are eligible for **operating assistance** . I will change how this paragraph is worded.

Commented [AL16R15]: Diane - please discuss at meeting, Christy can explain

Commented [DW17]: Please confirm how we incorporate Ride Pilot as the tool used to track and report data used in the TAM.

Commented [AL18R17]: I don't think we use ridepilot for this. We only have a couple eligible subs, and we require a FULL fleet inventory attached at time of application which would give us that information.

Commented [TY19]: I don't believe this is true. Only contracted agencies are included in the TAMS plan (contact Bryce James to concur). The assets are included in UTA's asset master - contact Joan Burke for the official name of the system they are included in

Commented [DW20R19]: Are any of the Section 5310 subs providing open door service?

Commented [DW21R19]: United Way operates open door service and is included in the TAM.

Commented [TY22R19]: This is not resolved - the 5310 assets are all listed in the TAMS plan - Alika please check on this.

Commented [AL23R19]: I did contact Bryce James, and he confirmed that United way is in the TAM plan.

Commented [AL24]: The paragraph below explains it better, so I removed these statements. Only applicable assets are included.

Commented [AL25]: I still am unsure if we should include specific software names, I am worried that will make the PMP able to be outdated more quickly. What if we added some kind of caveat? Like JDE Asset Master (or similar application if changed). Im not sure….Discuss at meeting

Reporting

UTA ensures that all reporting requirements are met in accordance with program requirements. UTA oversees and supports subrecipients in fulfilling reporting obligations to promote transparency, accountability, and effective program oversight.

Annual POP Status Report

At least annually for Section 5310 grants, UTA submits POP status reports to FTA. The reports include:

- An updated list of active projects reflecting revised project descriptions, changes in projects from one category to another, and adjustments within budget categories
- Budget revisions that reflect changes in line-item budgets, if applicable
- Significant civil rights compliance issues, such as Title VI, Equal Employment Opportunity (EEO), or Disadvantaged Business Enterprise (DBE) complaints against UTA or subrecipients
- Notable accomplishments or problems involving subrecipients

Federal Financial Reports (FFRs) and Milestone Progress Reports (MPRs)

UTA submits quarterly FFRs and MPRs in FTA's electronic grant management system. To support this reporting, subrecipients are required to submit financial invoices and project updates in a timely manner, consistent with the timelines and conditions outlined in their grant agreements. The FFRs and MPRs track project progress against budget, scope, and schedule, and are used to monitor compliance and performance.

Section 5310 Program Measure Reports

UTA submits annual Section 5310 Program Measure Reports to FTA in accordance with FTA Circular 9070.1. These reports evaluate the program's impact on mobility for seniors and individuals with disabilities by documenting vehicles purchased, passenger rides provided using federally-funded assets, service improvements achieved through operating or mobility management projects, and gaps in service filled. UTA collects both quantitative and qualitative data from subrecipients each year to ensure alignment with Coordinated Plan priorities and federal reporting requirements.

DBE Semi-Annual Report

UTA submits the Uniform Report of DBE Awards or Commitments and Payments to FTA semi-annually:

- June 1 (covering October 1–March 31)
- December 1 (covering April 1–September 30)

These reports include eligible contracting activity from both UTA and its subrecipients. To support accurate and timely reporting, UTA requires subrecipients to:

- Track all third-party contracting activity related to Section 5310 funds
- Report DBE participation data in accordance with UTA's guidance and invoicing templates

UTA provides technical assistance to ensure that subrecipients understand DBE requirements and incorporates DBE monitoring into its compliance monitoring process.

Commented [AL26]: Or quarterly if grant exceeds $$ threshold

Commented [DW27R26]: $2M; but this is at a minimum you officially report on the POP annual.

Commented [DW28R26]: Keep as is for now

Commented [AL29]: This makes it sound like we submit budget revisions annually no matter what. Region 8 prefers we submit as needed.

Commented [DW30R29]: REPORTING REQUIREMENTS.
a. Annual Program of Projects Status Reports. The status reports should be submitted electronically and are intended to meet minimal program information needs at the regional and national levels. Reports should include an updated POP for each approved Award that contains active projects. The updated POP should reflect revised project descriptions, changes in projects from one category to another, and adjustments within budget categories, if applicable. The updated POP can be imported as text into the project summary section of the Electronic Status Report.
If revisions to the POP result in changes to the line-item budget for the Award, appropriate prior approvals and post-award modifications, including amendments and budget revisions, may be required and documented in TrAMS.

Commented [DW31R29]: Added, "as applicable".

Commented [AL32]: Sent to Kenya for feedback

Commented [DW33R32]: Only discusses the requirements for the program. Does not address the process as that us recorded elsewhere.

Commented [AL34R32]: Kenya's team never responded to me about the DBE section. Discuss at meeting on Monday with Tracy.

National Transit Database (NTD)

Section 5310 subrecipients are generally not required to report directly to the NTD. However, UTA, as the designated recipient, may collect summary-level data such as vehicles purchased and rides provided to support national program monitoring and annual program measure reporting. If a subrecipient also receives funding under other FTA programs (such as 5307 or 5311) or meets NTD reporting thresholds, UTA will provide technical assistance to support compliance as needed.

Federal Funding Accountability and Transparency Act (FFATA) Subaward Reporting System (FSRS)

UTA complies with 2 CFR Part 170 and FFATA guidance by reporting all subawards of $30,000 or more to FSRS via the System of Award Management (SAM) at SAM.gov. These reports are submitted no later than the end of the month following the month in which the subaward is made. UTA gathers required subrecipient information—such as the Unique Entity Identifier (UEI), legal name, and organizational details—during the application and grant agreement process to support timely and accurate reporting.

Project Closeout

UTA is responsible for ensuring timely and complete closeout of all Section 5310 projects. Closeout occurs after project activities are completed, approved funds are fully expended, and required final documentation has been received and verified. Closeout activities include:

- Final review of expenditures and reimbursement requests
- Verification of compliance with reporting and asset management requirements
- Collection of required final reports and supporting records
- Review of vehicle condition and documentation for capital projects

Subrecipients are required to submit all final documentation and reimbursement requests within 90 days of completing project activities. UTA will initiate subaward closeout once these materials are received and approved. UTA will complete project- and grant-level closeout in FTA's electronic grant management system within 120 days. For vehicle and capital asset awards, UTA retains lienholder status and maintains oversight through the asset's final disposition, extending beyond the project's financial closeout. Although a project may be considered closed out, subrecipients must continue to comply with record retention, asset disposition, and audit access requirements.

> **Commented [AL35]:** Should we add AND asset requirements
>
> **Commented [TY36R35]:** yes

Record Retention

All records related to the performance and financial management of the project must be retained for at least three years from the date of the final FFR submission in FTA's grant management system, or after asset disposition, whichever is later. If litigation, audit, or claims arise during the retention period, records must be retained until all actions are fully resolved. Both UTA and FTA reserve the right to audit or review project documentation after closeout to ensure continued compliance.

Program Policies

This section of the PMP outlines UTA's policies specific to the Section 5310 program that must be addressed in the plan in accordance with FTA Circular 9070.1.

Goals

The program's goal is to improve mobility for seniors and individuals with disabilities by removing barriers to transportation services and expanding mobility options.

Objectives

The objectives of UTA's Section 5310 program include:

- Ensuring that seniors and individuals with disabilities have the same rights as all people to utilize transportation facilities and services
- Making special efforts in the planning and design of transportation services to assure seniors and individuals with disabilities the availability of transportation which they can effectively utilize
- Providing solutions for transportation services in areas where there are gaps, or where existing services are insufficient or inappropriate

UTA provides capital and operating financial assistance for transportation services planned, designed, and carried out to meet the special transportation needs of seniors and individuals with disabilities within the large urbanized areas of Salt Lake, Ogden–Layton, and Provo–Orem.

Eligible Subrecipients (Traditional)

Eligible subrecipients of traditional funds include:

- Private non-profit organizations
- Public bodies approved by the State of Utah to coordinate services for seniors and persons with disabilities.
- Public bodies that certify that no other non-profit organizations are readily available in the area to provide the service
- ~~Private for-profit transportation providers (e.g. taxi companies), but only for capital projects when they carry out services as permitted under 9070.1. These providers may also contract with eligible subrecipients for service delivery.~~

Eligible Projects (Traditional)

Eligible traditional projects may include:

- Purchase of Accessible Transit Vans, Mini-vans, Sedans, or Cutaway Buses
- Purchase of Non-Accessible vehicles with certificate of equivalent service
- Preventive Maintenance
- Third Party Contracted Transportation Services
- Mobility Management
- Other projects with written approval may be considered

Commented [DW37]: UTA Team:,
I don't think this is correct. Private for profit entities are not eligible subrecipients for traditional 5310 funds. Therefore, taxi companies are not eligible subrecipients here under the traditional program, but can be contracted by an eligible subrecipient who receives such funds.

They are however eligible subrecipients under the Non-traditional program as a provider of public transportation.

FTA C. 9070 Ch. III6.- pgs. 4-5
*Section 5310 (b) provides that of the amounts apportioned to States and Designated Recipients, **not less than 55 percent shall be available for traditional Section 5310 projects**—those public transportation capital projects planned, designed, and carried out to meet the specific needs of seniors and individuals with disabilities when public transportation is insufficient, unavailable, or inappropriate. Further, the law provides that, for these projects, a **recipient may allocate the funds apportioned to it to:
a. A private nonprofit organization; or
b. A State or local governmental authority that:
(1) Is approved by a State to coordinate services for seniors and individuals with disabilities; or
(2) Certifies that there are no nonprofit organizations readily available in the area to provide the service.**
Governmental authorities eligible to apply for Section 5310 funds as "coordinators of services for seniors and individuals with disabilities" are those designated by the State to coordinate human service activities in a particular area. Examples of such eligible governmental authorities are a county agency on aging or a public transit provider that the State has identified as the lead agency to coordinate transportation services funded by multiple Federal or State human service programs.*

FTA C. 9070 Ch.III 7. & 8.- pgs. 5
*7. ELIGIBLE SUBRECIPIENTS FOR OTHER SECTION 5310 PROJECTS. Eligible subrecipients for other eligible Section 5310 activities include a State or local governmental authority, a private nonprofit organization, **or an operator of public transportation** that receives a Section 5310 Award indirectly through a recipient.*

Commented [AL38R37]: We have a subrecipient that is eligible as a private taxi company and received vehicles from us. They perform SHARED RIDE ON DEMAND SERVICE with the 5310 vehicles. Discuss with Chrsity at meeting. We need to leave this paragraph in, because they ARE permitted and we DO award them, and our regional office has agreed to it.

Eligible Subrecipients (Non-traditional)

Eligible subrecipients of non-traditional funds are local governmental authorities and public transportation providers, including private for-profit transportation providers (e.g. taxi companies).

Eligible Projects (Non-traditional)

Eligible non-traditional projects may include:
- Operating Assistance
- Voucher Programs
- Mobility Management
- Other capital projects upon UTA approval

Subrecipients must have adequate legal, financial, and technical capacity to receive funds and operate the program. To remain eligible to participate in the UTA program, subrecipients must maintain compliance with the grant agreement.

Local Share and Local Funding Requirements

The local share for eligible projects, i.e. capital, mobility management, third-party provider contracts, is 20 percent. The local share for eligible operating assistance and voucher programs is 50 percent.

The matching share for capital and operating costs may be from a source that includes local government, unrestricted federal, private or local cash funds. The grant agreement will identify the required percentage of local share. Some examples of sources of local match that may be used for any or the entire local share include state or local appropriations; dedicated tax revenues; private donations; program income (as defined in 2 CFR 200.307) may be used as local match when earned directly from activities supported by the grant. Examples include rider fares, and client contributions. and income generated from advertising and concessions.

Contract revenue is also eligible as local match provided that the original funding source is a non-U.S. Department of Transportation (USDOT) federal program such as Community Development Block Grants, Federal Aging dollars or Medicaid, county aging services, and the contract is directly related to the transportation services being provided.

Eligible operating assistance is determined by the net operating deficit after fares and ineligible expenses are deducted from total expenses.

Subrecipients must provide a letter stating that the organization is designating/providing funds for the local match. The letter must also state that the organization has committed resources to provide funding throughout the entirety of the proposed project. The letter must be signed by an individual in the organization with authority to approve said expenditures.

Note: Medicaid funds are generally **not allowable** as local match for Section 5310 grants, as they are considered federal funds. However, in some cases, **program**

Commented [TY39]: I believe the eligibility is the same as traditional? Let's discuss this

Commented [DW40R39]: Alika to revise eligible subrecipient categories

Commented [DW41R39]: As follow up to this conversation, I clarified what is required based on what UTA allows. As a result, the two categories will be different.

Commented [AL42R39]: Taxi companies are not eligible for operating or other non-traditional projects, they are only eligible for vehicles if using them for shared on demand service.

Commented [AL43]: Should we add this? I believe voucher gets reimbursed 50% and is considered operational, but I don't know if it needs its own category

Commented [DW44R43]: If this is true, you can include it as one of the three **Public Transportation Alternatives** discussed in the circular Ch. IV 3.d. Included in this category would be the vehicles purchased to Support Accessible Taxi, TNC, Ride-Sharing, and/or Vanpooling Programs.

You can add both of them or just the category here like you do for "operating assistance" and "other capital project." This would make it consistent. Here is the language in the circular:

FTA C. 9070 Ch. IV 3..- pgs. 7-8
d. Public Transportation Alternatives that Assist Seniors and Individuals with Disabilities with Transportation. The following activities are examples of projects that are eligible public transportation alternatives.
(1) Purchasing Vehicles to Support Accessible Taxi, TNC, Ride-Sharing, and/or Vanpooling Programs. Section 5310 funds can be used to purchase and operate accessible vehicles for use in taxi, TNC, ride-sharing, and/or vanpool programs provided that the [...]

Commented [AL45]: I believe the term "equipment" would make it a traditional project, am I wrong?

Commented [TY46R45]: I would use "Other Capital projects" upon UTA approval

Commented [DW47R45]: Updated

Commented [DW48]: May I suggest we not add this, as it gets complicated. Program income derived from the program that may have already been funded by federal dollars and may not be used to match the [...]

Commented [TY49]: DOT federal funds are not allowable as match. I don't think Medicaid comes from DOT budgets??The come from US General funds - Diane - I may be wrong - would you verify
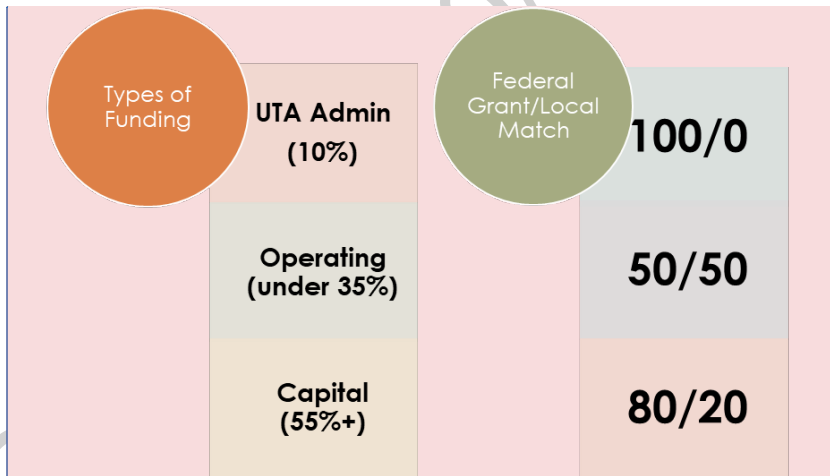
Commented [AL50R49]: If Diance says medical is allowable, but I did research last application cycle to find an answer and from what I found, it is considered Federal even though its provided by the state so I wa [...]

~~income generated from Medicaid-funded transportation services~~ ~~may be used as match, provided it is properly documented and compliant with **2 CFR 200.307(e)** and **FTA guidance**. Subrecipients should consult with UTA before using any Medicaid-related revenue as match.~~

Method of Distributing Apportionment

UTA distributes Section 5310 funds through a competitive application process such that funds are distributed in a nondiscriminatory way. Notices of funding availability are shared with potential subrecipients, including local agencies, private providers, MPOs, and human service organizations within each urbanized area.

UTA ensures that at least 55 percent of its annual Section 5310 apportionment is used to support traditional capital projects that are designed to meet the special transportation needs of seniors and individuals with disabilities when public transportation is insufficient, inappropriate, or unavailable. UTA sets aside 10 percent for state administration based on need. The remaining funds (up to 35 percent) are used for nontraditional capital or operating projects that improve access to fixed-route service, reduce reliance on complementary paratransit, or support mobility management activities. UTA tracks awards by project type to ensure compliance with the 55 percent threshold, and this distinction is reinforced in the Pre-Award Grant Guide.

		Federal Grant/Local Match
Types of Funding	UTA Admin (10%)	100/0
	Operating (under 35%)	50/50
	Capital (55%+)	80/20

Project Selection Criteria

UTA's project selection process includes a competitive application to ensure that funds are distributed in a fair and nondiscriminatory manner. All applicants must demonstrate that proposed services address the mobility needs of seniors and individuals with disabilities in the large urbanized areas served by UTA. Selection criteria may include, but are not limited to:

- Project inclusion in the locally developed Coordinated Plan

Commented [AL51]: This is something I get asked A LOT by subrecipients, so I am wondering if it should be included OR I can remove it from here and add it to the grant management guide, but I want it to be very cleaar to them that Medicaid is considered federal, usually even if the state administered it.

Commented [DW52R51]: I am not so sure this is correct per the circular this note conflicts what we say in the "contract revenue" paragraph and the excerpt from the circular below. Did you mean that you can't use the same federal funds to match multiple federal programs?

FTA C. Ch. III. 10.a.
*...the local share may be derived from Federal programs that are eligible to be expended for transportation other than DOT programs or from DOT's Federal Lands Highway program. **Examples of programs that are potential sources of local match** include employment, training, aging, **medical, community services, and** rehabilitation services. Specific resources for finding program information about other Federal funding that can be used to meet local share requirements can be found on FTA's website.*

Commented [AL53]: What do you mean by "state" administration?

Commented [DW54]: Please confirm that 10% is not retained by UTA for administration.

Commented [TY55R54]: We do retain 10% for administration

Commented [DW56R54]: Diane to add sentence about the use of 10% for admin.

Commented [DW57]: UTA Team:
Just confirming that you are aware that these activities are eligible under the 5310 Traditional and non-Traditional funds program also. We only mention it under this part of the discussion (non traditional)

FTA C. 9070 Ch. IV.2.f. pg. IV-3 to IV-4

Commented [AL58R57]: Yes, we HAVE in the past included it as non-traditional (like operating) when we needed to, but typically we award it as traditional. I think weve only ever awarded it at 50% once. Its muc

Commented [AL59]: Should we change to "award", look up how it is stated in the circular

Commented [TY60R59]: Yes - change to UTA awards instead of "tracks expenditures"

Commented [LA61]: you can remove if you want, but I thought my visuals from the old PMP really helped for understandng. Maybe we can just put some of that into the grant guide and expand it.

Commented [DW62R61]: I like graphics. When we get to near final point, I think we should add more.

- Demonstrated need for the project and service gaps addressed
- Degree of coordination with other local human service and transportation providers
- Project readiness and ability to implement within grant timelines
- Financial and technical capacity of the applicant
- Cost-effectiveness of the proposed project
- Past performance and compliance history (for returning subrecipients)
- Alignment with UTA's strategic priorities for expanding accessible services
- Public input and feedback during the planning and application phases

UTA announces the availability of Section 5310 funding through a public notice and application cycle. The details of the funding opportunity, including eligibility, deadlines, technical assistance, and application requirements, are provided in the Grant Application GuidebookPre-Award Guide, which is published before applications are due and maintained separately from this PMP to allow for periodic updates. UTA strives to ensure broad outreach to eligible applicants and stakeholders, including nonprofit organizations, local government agencies, and community-based service providers.

UTA strives to fund all eligible applicants, within funding limits, and in a fair and transparent manner.

Locally Developed Coordinated Plan

UTA is responsible for ensuring that all funded projects are derived from a locally developed Coordinated Plan. These plans are developed in partnership with MPOs, LCCs, human service agencies, transit providers, and members of the public to identify transportation needs and strategies for improving mobility for seniors and individuals with disabilities.

The Coordinated Plan serves as a strategic framework to:
- Identify transportation needs and service gaps
- Propose strategies to address unmet mobility needs
- Inventory available transportation resources
- Enhance coordination among human service and transit providers
- Prioritize projects for potential funding

UTA facilitates ongoing collaboration with the three MPOs, WFRC, and MAG, in support of Coordinated Plan updates and implementation. LCCs for each large urbanized area serve as a forum for stakeholders to participate in plan development and provide input on project prioritization.

UTA supports three active LCCs aligned with Utah's large urbanized areas:
- Salt Lake County LCC- serves the Salt Lake UZA
- Weber/Davis LCC- serves the Ogden-Layton UZA
- Utah County LCC-serves the Provo-Orem UZA

Commented [AL63]: We also look at staffing capacity, or maybe we could call it implementation capacity

Commented [TY64R63]: Implement capacity is good

Commented [AL65]: Risk Level

Commented [TY66R65]: I like the language included. Risk seems negative

Commented [AL67]: Application phase would only be GMAT and LCC feedback. Should we change wording?

Commented [TY68R67]: We do put the 5310 funds out for public input through the TIP/STIP process. So I think the language is ok

Commented [AL69]: That doesnt usually come out by the time the NOFO is due. Typically the NOFO is posted on our website and sent to MPOs first. Then the application guide is updated prior to the application workshop.

Commented [TY70R69]: I added language?

These councils convene stakeholders from the public, private, and nonprofit sectors — including seniors, individuals with disabilities, human service agencies, transportation providers, and local government representatives. LCCs meet multiple times per year and play a central role in identifying service needs, coordinating projects, and assisting with the development and updates of Coordinated Plans.

To be eligible for Section 5310 funding, applicants must ensure that proposed projects are included in, or consistent with, the Coordinated Plan applicable to their service area. Each Coordinated Plan is made publicly available and updated periodically to reflect changing needs, evolving service models, and public feedback. UTA supports these updates through public outreach, data analysis, and consultation with LCC members and MPO partners.

Program Measures

FTA requires designated recipients and subrecipients to track and report on specific performance measures that evaluate the effectiveness of Section 5310-funded projects. UTA collects quarterly reports from subrecipients to assess the impact of both traditional and non-traditional projects.

For traditional projects, subrecipients must submit quarterly ridership reports that address the following program measures:
- **Gaps in service filled** – provision of transportation options that would not otherwise be available for seniors and individuals with disabilities measured in number of seniors and people with disabilities afforded mobility they would not have without program support as a result of traditional Section 5310 projects implemented in the current reporting year.

- **Ridership** – actual or estimated number of rides (as measured by one-way passenger trips) provided quarterly for individuals with disabilities and seniors on Section 5310-supported vehicles and services as a result of traditional Section 5310 projects implemented in the current reporting year.

For non-traditional transportation projects, the program measures are:
- **Increases or enhancements** related to geographic coverage, service quality, and/or service times that impact availability of transportation services for seniors and individuals with disabilities as a result of other Section 5310 projects implemented in the current reporting year

- **Additions or changes** to physical infrastructure (e.g., transportation facilities, sidewalks, etc.), technology, and vehicles that impact availability of transportation services for seniors and individuals with disabilities because of other Section 5310 projects implemented in the current reporting year

- **Actual or estimated number of rides** (as measured by one-way passenger trips) provided for seniors and individuals with disabilities as a result of other Section 5310 projects implemented in the current reporting year

UTA uses these measures to inform program oversight, annual evaluations, and FTA performance reporting. Subrecipients must maintain supporting documentation and comply with UTA's reporting requirements, which are outlined in the Post Award Management Guide and grant agreements.

Commented [DW72]: Please confirm

Commented [AL73R72]: Yes this sounds good.

Funds Transfer

In the event that funding demand or regional needs fluctuate, UTA may reallocate funds between projects within its large urbanized areas (Salt Lake, Ogden–Layton, and Provo–Orem), as necessary, to meet the transportation needs of seniors and individuals with disabilities.

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Program Management

UTA is responsible for overseeing the full lifecycle of project implementation, including procurement, financial and asset management, technical assistance, training, oversight, reporting, and closeout (reporting and closeout is addressed under the "UTA Roles and Responsibilities Section"). These activities are supported by this PMP, internal policies, grant agreements, and other supplemental documents ~~such as the Pre-Award Guide, Post-Award Management Guide~~.

Procurement

UTA and its subrecipients are required to comply with all applicable state (Utah Code Title 63G, Chapter 6a — Utah Procurement Code) and federal procurement laws and UTA's procurement policies and procedures. The federal regulations applicable when using Section 5310 funds include, but are not limited to:

- 2 CFR Part 180 – Government-wide Debarment and Suspension (Nonprocurement)
- 2 CFR Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- 49 CFR Part 20 – New Restrictions on Lobbying
- 49 CFR Part 661 – Buy America Requirements
- 49 CFR Part 663 – Pre-award and Post-delivery Audits of Rolling Stock Purchases
- 49 CFR Part 665 – Bus Testing
- FTA Circular 4220.1F – Third Party Contracting Guidance

UTA follows its internal procurement policies and procedures and ensures all federally-funded procurements include required certifications, clauses, and a complete procurement history. UTA directly manages procurement of certain capital projects, such as accessible vehicles and mobility management equipment, or may authorize subrecipients to conduct their own procurement with prior approval. In order for subrecipients to procure any federally funded items themselves, they must have a low-risk rating, and a written procurement policy and program that meets the above standards.

Subrecipient Procurements

Subrecipients must comply with federal and applicable local procurement regulations and must not split procurements to avoid competitive thresholds. UTA provides guidance and technical assistance during pre-solicitation and pre-award phases to ensure compliance. Subrecipients must:

- Develop a written procurement policy to help guide the procurement process and ensure all federal, state, and local requirements are met
- Include all required federal clauses in solicitations and contracts
- Demonstrate competitive procurement (sealed bid, competitive proposal, or micro-purchase thresholds)
- Conduct pre-award and post-delivery audits for vehicle purchases

Commented [AL74]: We decided we are going to change the names of these documents. Pre-award management and Post-award management, and then there will be a separate step-by-step technical assistance guide for zoomgrants that will not contain grant management info.

Commented [DW75R74]: I recommend you not listing them so as not to be tied to names that will need updating here. Do we need to take it out elsewhere and use a generic reference?

Commented [AL76R74]: Im fine with that. But what should we say instead?

Commented [AL77]: Would it be possible to gear this section more towards 3rd party contracting? Our subs would benefit more from that information of what is required rather than procurement. OR we could add a section below for 3rd party and keep this section in.

Commented [TY78R77]: I would add a section about 3rd party contracting

Commented [AL79R77]: @Diane Can you help with what this section could look like?

- Maintain records supporting the procurement process and contract execution
- Request prior written approval from UTA for any sole-source procurements or purchases over a specific threshold (as detailed in the Grant Application Guidebook)
- Implement a contract administration process to ensure that contractors perform in accordance with the terms and conditions of the agreement

Procurement documentation is reviewed by UTA as part of compliance monitoring.

Third-Party Contracting and Transportation Service Agreements

UTA recognizes that subrecipients may contract with third-party transportation providers (e.g., private taxi companies, non-profit agencies, or other eligible entities) to deliver specialized transportation services. These partnerships can significantly expand mobility options and fill service gaps for seniors and individuals with disabilities. While UTA retains primary responsibility for grant compliance and oversight, subrecipients are responsible for ensuring that all third-party contracts meet federal, state, and UTA requirements.

Subrecipient Responsibilities
Subrecipients entering into third-party service contracts must:
Ensure all services align with the approved scope of work and budget for the Section 5310-funded project.
- Submit a copy of the service agreement or Memorandum of Understanding to UTA for review and maintain it on file
- Include all applicable FTA-required federal clauses in the contract
- Demonstrate that trips reimbursed with Section 5310 funds were:
  o Provided to eligible clients (i.e., seniors adults or individuals with disabilities)
  o Documented with origin, destination, and purpose of trip
  o Charged at fair and reasonable rates
- Monitor the contractor's performance and compliance, including trip logs and maintenance records if vehicles are used
- Maintain appropriate documentation to support all invoiced services.

Contractor Responsibilities
Third-party transportation providers must:
- Be a registered business or public/nonprofit entity capable of providing accessible transportation
- Maintain all required licenses, insurance, and operating authority
- Provide trip-level data upon request, including passenger eligibility and trip purpose
- Comply with all applicable federal requirements as outlined in their contract
- Cooperate with UTA and the subrecipient for any compliance or performance monitoring reviews

UTA Support
UTA offers technical assistance to subrecipients by:

Commented [AL80]: I replaced the subrecipient procurement section with a 3rd party contracting section, please give me feedback on how it is worded and it you want to remove any of the UTA Support language.Our goal is to encourage 3rd party contracting for transportation services to help fill gaps, and make it as simple to subs as possible

Commented [DW81R80]: I like this write up. We can keep it her if you like but since you allocate operating funds, subrecipients may enter into other third party contracts for services and goods, such as maintenance, janitorial, accounting, etc. Limiting the discussion to third party service agreements excludes any other third party contracting that will need to meet the federal requirements. We may need to add general requirements here too.

Let me know if you agree with how I restructured this section.

Commented [AL82R80]: I would argue that those are not allowed services because while operating, they are indirect. Janitorial services do not support their project directly. Accounting services are also in-direct costs. We only allow 3rd party contracts for transportation services that directly support their project.
The way its structured looks good.

- Reviewing draft contracts to ensure inclusion of required federal clauses
- Providing sample templates or guidance on contracting processes
- Offering compliance checklists to help document oversight
- Supporting the resolution of performance or invoicing issues

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Financial Management

UTA manages Section 5310 funds in accordance with federal grant requirements (2 CFR Part 200) and Generally Accepted Accounting Principles (GAAP). UTA relies on its Board-approved financial policies and internal financial management systems to ensure that it:

- Adequately accounts for financial transactions
- Funds are tracked and disbursed following UTA's established procedures
- Expenditures are accurate, authorized, and within appropriated budgets
- Subrecipients are reimbursed only for eligible expenses after submission of required documentation.

Budgeting

UTA follows a structured and transparent budgeting process that aligns with its strategic priorities and community needs as outlined below.

1. Strategic Planning and Prioritization

UTA begins its budgeting process by aligning with its Strategic Plan, which includes goals related to service expansion, equity, sustainability, and operational efficiency. Budget priorities are shaped by:

- Community feedback
- Ridership trends
- Legislative and funding changes
- Long-term capital planning

2. Budget Development Phases

The budgeting process typically includes the following phases:

- *Preliminary Planning*: Internal departments submit budget requests based on projected needs and strategic goals.
- *Tentative Budget*: A draft budget is prepared and presented to the Board of Trustees. This includes operating and capital budgets, staffing plans, and service changes.
- *Public Review and Feedback*: UTA holds public meetings and invites community input on the tentative budget.
- *Final Budget Approval*: After incorporating feedback and making adjustments, the Board of Trustees adopts the final budget.

3. Budget Components

UTA's budget includes:

- *Operating Budget*: Covers day-to-day expenses like wages, fuel, maintenance, and service delivery.

- *Capital Budget*: Funds infrastructure projects, vehicle purchases, and technology upgrades.
- *Revenue Sources*: Sales tax, federal grants (e.g., FTA), fare revenue, and local government contributions.
- *Expense Categories*: Personnel, services, materials, fuel, parts, utilities, and capital outlays.

4. Performance and Accountability

UTA tracks performance metrics such as:
- Ridership
- On-time performance
- Platform hours
- Cost per service hour

These metrics help evaluate budget effectiveness and guide future planning.

Financial Management Systems

UTA uses a combination of enterprise resource planning (ERP) systems and specialized platforms to process financial transactions as described below:

1. ERP Integration

UTA has implemented a platform-based ERP system that integrates various financial functions, including:
- General ledger
- Accounts payable and receivable
- Budgeting
- Payroll
- Asset management

This ERP system is designed to support UTA's internal controls and financial reporting in accordance with GAAP and Governmental Accounting Standards Board.

2. Cloud Inventory Platform

UTA uses the Cloud Inventory platform to manage work orders and inventory processes. This system is integrated with the ERP and supports mobile applications for field operations.

3. Financial Reporting

UTA's Finance Department prepares detailed financial reports using these systems, including:
- Annual Comprehensive Financial Reports (ACFR)
- Budget-to-actual comparisons
- Federal award expenditure tracking

Grant Management Systems

Included in its financial systems is UTA's internal and external-facing grant management systems, along with an external vehicle management system for

subrecipients to manage their fleet. UTA uses its grant management systems for administering awards, collecting applications, facilitating post-award reimbursements, and reporting. For vehicle-specific activities under the program, UTA uses its vehicle management system to track one-way trips, preventive maintenance, warranties, accidents, and other vehicle and trip information. Together, these systems support transparent, auditable, and federally-compliant grant administration across the full project lifecycle.

These systems allow for the automation of the following functions:
- Applications
- Grants
- Invoicing
- Reporting
- Technical Assistance
- Oversight
- Closeout
- Asset Management

UTA performs periodic reconciliations with the FTA electronic grant management system to ensure consistency for obligations, expenditures, reimbursements, and project balances.

Subrecipient Financial Management
UTA requires that all subrecipients have financial management systems that:
- include records documenting compliance with federal statutes, regulations, and the terms and conditions of the grant agreement
- are sufficient to permit the preparation of reports required by the terms and conditions
- can track expenditures to establish that funds have been used in accordance with federal statutes, regulations, and the terms and conditions of the grant agreement

Subrecipients are required to maintain proper financial records, including supporting documentation for all eligible expenditures, and may be subject to periodic monitoring and audit to verify compliance.

Indirect Cost/Cost Allocation Plans
UTA does not charge indirect costs to Section 5310 grants, nor reimburse subrecipients for indirect costs.

Audits
UTA's financial operations are subject to oversight under the State Money Management Act, codified in Utah Code Title 51, Chapter 7. It governs how public funds are managed, invested, and safeguarded by state and local government entities in Utah. The Act sets forth that:
- Public entities must follow strict internal controls and reporting requirements
- The State Treasurer and the Council monitor compliance

- Investment activities may be subject to audit and review.

UTA undergoes an annual Single Audit conducted by an independent accounting firm, in accordance with 2 CFR Part 200, Subpart F. Completed audits are submitted to the Federal Audit Clearinghouse (FAC) as required. UTA's Single Audit, ACFR, and related financial documents are available on UTA's website and at the FAC.

Subrecipients are required to comply with federal audit requirements based on their level of federal expenditures:
- **Subrecipients that expend $1 Million or more** in federal funds in a single fiscal year must submit a Single Audit, prepared by an independent auditor, to the FAC and provide a copy to UTA.
- **Subrecipients below the $1 Million threshold** are not subject to the Single Audit requirement but must still submit their most recent financial statements as part of UTA's biennial application process.

UTA reviews audit submissions and financial statements as part of its compliance monitoring and risk assessment process.

Vehicles and Equipment
Most UTA-administered Section 5310 projects are for the procurement of vehicles and equipment. UTA defines equipment as capital purchases with an original unit cost of $10,000 or more and a useful life of one year or more. UTA ensures that all assets procured under the program are tracked in an inventory system, properly maintained, and disposed of in accordance with FTA guidelines. UTA is responsible for retaining vehicle titles until disposed. Subrecipients are responsible for maintaining vehicles and complying with minimum useful life and reporting requirements.

Commented [AL88]: UTA is responsible

Title
Vehicles are to be titled to the subrecipient to ensure the ability to obtain insurance. UTA must be listed as the lien holder on the title for all vehicles purchased with funds administered by UTA. UTA will remain the lien holder on the title until disposition. When a subrecipient is ready to dispose of a vehicle, they must contact UTA to request the title.

Insurance
UTA requires all subrecipients receiving Section 5310-funded vehicles to maintain adequate insurance coverage as specified in their grant agreement throughout the life of the vehicle, in accordance with UTA policy and federal requirements. These provisions are intended to protect the federal interest and ensure proper risk management at the subrecipient level. All insurance coverage must be documented and kept current as a condition of grant participation. Insurance requirements apply

regardless of whether a vehicle is in service or temporarily out of service. UTA must be listed as additional insured on the agency's insurance policy.

Subrecipients' grant agreements outline the specific type and amount of coverage required for these assets.

1. **Insurance Oversight and Monitoring**

UTA verifies insurance compliance as part of its compliance monitoring:
- Insurance cards are reviewed at the time of vehicle delivery and vehicle biennial inspection, and certification of insurance (COI) is reviewed during ongoing biennial or annual site visits conducted by UTA staff.
- Subrecipients must notify UTA immediately of any lapse in coverage, changes to insurance carriers, or material modifications to coverage levels.
- In the event of an accident involving a Section 5310-funded vehicle, subrecipients must follow UTA's incident reporting procedures and cooperate in any subsequent investigation or claims process.

2. **Insurance Costs and Eligibility**

Insurance costs associated with Section 5310-funded vehicles are considered eligible expenses and may be capitalized when funded as part of a vehicle acquisition. Ongoing operating costs such as insurance premiums may also be eligible for reimbursement under operating assistance grants, subject to grant-specific funding constraints and approval.

Records

UTA maintains a complete listing of all active Section 5310 subrecipient vehicles records in UTA's vehicle management system. UTA also maintains a complete list of all assets including vehicles, and other equipment in the JDE accounting system and inventory program. Subrecipients are required to maintain their own full vehicle fleet and equipment inventory in an FTA Fleet Spreadsheet, and track vehicles that are active Section 5310 assets in UTA's vehicle management system in accordance with the grant agreement and standard operating procedures.

Subrecipients will be required to maintain all supporting documentation related to the acquisition, use, and maintenance of federally-funded assets and to report any changes in use, condition, or ownership. UTA conducts periodic reviews to confirm compliance with use, maintenance, and reporting requirements.

Maintenance and Warranty Program

UTA requires all subrecipients to implement a comprehensive preventive maintenance and warranty program to ensure that federally-funded vehicles and equipment remain safe, reliable, and in service for their full useful life. All maintenance must follow manufacturer-recommended service intervals and comply with FTA regulations. Subrecipients must:
- Maintain vehicles and equipment in good operating condition and promptly address mechanical issues or damage
- Perform routine preventive maintenance (i.e. oil changes, tire rotations, inspections)

Commented [AL89]: What does this mean?

Commented [TY90R89]: Classed as an eligible capital cost?

Commented [AL91R89]: Diane can you clarfiy? I thought insurance was only eligible for operating.

Commented [DW92]: Why are they not tracking inactive 5310 assets?

Commented [AL93R92]: Once the vehicles have met their useful life, we do not require them to track in ridepilot is what I am trying to say here.

Commented [AL94]: I am not sure what this is called. Check with Joan.

Commented [AL95R94]: "The "program or application" in JDE would be called the Asset Master. JDE would be our database that is the source of truth for anything asset related. We have other tools like the ArcGIS Feild Maps program to inventory all of our assets to the FTA requirements (Every 2 years, condition rating, found/unfound, etc). GIS is the inventory side. "

Commented [AL96]: Prev maint plan is in ridepilot, we currently do not say anything about warranties in our agreement

Commented [AL97R96]: I sent this to Amanda to see if she wanted to add anything about warranties

Commented [DW98R96]: Warranty recovery program is required by 5010. Easiest way to implement is to ensure one is written.

Commented [AL99R96]: This is what Scott at NRV said: The only thing we really have at this time is a line in the NRV maintenance SOP that states that users should take their vehicles to the dealer while they are under new vehicle warranty. They are expected to send the invoices/work orders to us for record keeping, but we do not currently track how many/when/where, etc...
It's kind of the same thing for vehicle recalls - we inform the users and they send the paperwork, but we do not log them.

Is it sufficient to refer to this SOP? Should we add in our grant management guide that subs should upload warranties and claims to ridepilot, to show we request them to be logged?

- Track and resolve warranty-covered issues during the applicable warranty periods
- Retain all maintenance and warranty records throughout the useful life and for at least three years after disposition.

Maintenance and warranty tracking is performed in UTA's vehicle management system. Subrecipients must regularly update the system with completed maintenance milestones, any major repairs or breakdowns, and details of warranty-covered repairs or claims submitted.

UTA will confirm that each subrecipient has developed and implemented a preventive maintenance and warranty management program for all applicable UTA federally-funded assets as part of its compliance monitoring. This includes:
- Reviewing maintenance plans and checklists
- Reviewing sample maintenance records to confirm that preventive maintenance was completed timely
- Verifying the existence of a warranty tracking process
- Reviewing a sample of warranty claims submitted to ensure subrecipients are making full use of manufacturer warranties
- Ensuring subrecipients respond appropriately to recalls and warranty notices.

Failure to maintain a compliant maintenance or warranty program may affect subrecipient eligibility for future Section 5310 funding and may result in corrective action.

Incidental Use
Subrecipients can track incidental trips in UTA's vehicle management system. Incidental use may not interfere with either the intended uses of the asset or the subrecipient's ability to maintain satisfactory continuing control. Subrecipients must reinvest any income generated from the incidental use back into their transportation program.

Subrecipients are responsible for maintaining clear documentation of all incidental use, and explaining it in their quarterly report including:
- Description and frequency of use
- Revenue generated (if applicable)
- Confirmation that the use does not interfere with the primary service for which the asset was procured

UTA confirms that incidental uses are consistent with the primary intended purpose, are not excessive in scope or duration, and are properly tracked and disclosed as part of compliance monitoring.

Useful Life
UTA follows FTA guidance to establish useful life standards for FTA-funded assets. These standards define the expected minimum period during which assets must be used in service before becoming eligible for disposition.

Commented [DW100]: Per 2024 Grant Guide: USEFUL LIFE OF ASSETS The useful life of all vehicles we award is 4 years or 100k miles, whichever comes first. The useful life of other assets over $5,000 will be stated in your grant agreement.

The information outlined here may need to change.

Commented [AL101R100]: I met with our asset manager and confirmed that this section is correct. She said other assets outside the vehicles depend on the manufacturers guidelines so I added that in 2. for equipment.

For Section 5310-funded vehicles and equipment, UTA has established the following minimum useful life benchmarks:

1. For vehicles:
Vehicles awarded through the Section 5310 program have a useful life of four years or 100,000 miles, whichever comes first. (Vans, sedans, minivans, paratransit cutaway bus with maximum capacity for 14 passengers)

2. For equipment:
Equipment may vary by the manufacturer's specifications and will be determined upon award.

Subrecipients are required to track the mileage and condition of their vehicles through UTA's vehicle management system. UTA confirms adherence to these standards through technical assistance, quarterly reporting, and compliance monitoring.

Disposition and Proceeds

Under normal circumstances, UTA will only consider the disposition of assets in any category that has met the minimum useful life either in years or miles (which ever happens first) and if they are no longer in a state of good repair or can no longer be maintained to a state of good repair within reasonable measures. Meeting the useful life minimum requirements (in years or miles) will not guarantee release of title and disposal of the asset.

Once a vehicle or other capital asset has reached the end of its minimum useful life, the subrecipient may request disposition approval from UTA. UTA uses its vehicle management system's data to assess whether an asset has met its useful life threshold prior to approving any disposition request. Subrecipients must maintain records to demonstrate that assets are being preserved in a state of good repair for the duration of their useful life.

UTA will consider earlier disposition for documented and unusual circumstances and will review these requests on a case-by-case basis. Requests to dispose of assets before reaching their minimum useful life must include justification and be approved by UTA and, where required, the FTA.

Equipment, including non-revenue vehicles, will be eligible to be considered for replacement or disposal when the minimum useful life has been met.

Disposition records must include the sale date, method of sale, buyer information, and sale amount. If the vehicle was not sold, but was deemed a total loss by insurance, more documentation may be required. These records are reviewed during UTA's compliance monitoring.

Transfer of Equipment

UTA may transfer assets to another subrecipient. UTA remains the first lien holder to retain the federal interest in vehicles.

Commented [AL102]: Add: insurance payout information if car was in an accident or deemed a total loss, photos if necessary, and how the value of the vehicle was determined.

Commented [TY103R102]: agree

Commented [AL104R102]: Added a sentence, let me know if you agree.

Technical Assistance, Training, and Oversight

UTA provides technical assistance, training, and oversight to help subrecipients effectively manage projects, comply with federal requirements, and improve service delivery for seniors and individuals with disabilities. Support is provided through individualized guidance, workshops, YouTube videos, compliance monitoring, virtual lunch and learns, and online resources.

Technical Assistance

UTA's technical assistance focuses on three primary areas:

1. Planning and Project Development

UTA assists subrecipients in identifying mobility needs, designing projects aligned with the Coordinated Plan, and developing competitive applications for funding. Technical assistance includes:

- Guidance on matching local needs with eligible activities
- Support for setting measurable goals and performance outcomes
- Clarification of funding timelines and allowable project scopes
- Assistance integrating proposed services into the broader regional mobility network

Planning support may also involve facilitating collaboration with MPOs, LCCs, and other transportation partners.

2. Vehicle and Equipment Procurement

UTA oversees procurement of vehicles and eligible equipment under the Section 5310 program. All procurements must follow applicable federal requirements and UTA policies and procedures.

3. Safety and Security

UTA provides guidance and resources to ensure subrecipients maintain safe and secure transportation operations. While not required to develop a formal Public Transportation Agency Safety Plan (PTASP) under 49 U.S.C. 5329(d), UTA encourages subrecipients to adopt basic safety practices, including:

- Preventive maintenance schedules and recordkeeping in UTA's vehicle management system
- Proper driver training, including Americans with Disabilities Act (ADA) sensitivity and emergency response
- Incident and accident reporting protocols
- Insurance requirements and claim procedures for capital assets
- Written policies to prevent damage, theft, and loss of federal assets

UTA staff review safety-related practices as part of oversight and provide individualized coaching as needed.

Training

UTA offers a comprehensive set of Section 5310 training resources to support subrecipients in managing vehicles, grants, and compliance requirements. Key training categories and tools available include:

- Pre and Post Award Management
- Asset Management Resources
- Operations & Reporting
- Civil Rights & Accessibility

More information about these offerings can be found on UTA's website.

Oversight

Oversight of subrecipients is conducted through a combination of desk reviews, quarterly reporting, site visits, and technical assistance based on risk level. UTA monitors project performance, financial compliance, and FTA regulatory adherence. Site visits may include vehicle inspections, review of maintenance records, financial records, and review of policies and procedures. Key highlights of the process include a risk assessment and site visit and vehicle inspection.

1. Risk Assessment

UTA integrates risk assessment into its oversight of subrecipients to identify potential areas of concern and to allocate technical assistance resources efficiently. Risk is evaluated based on several factors, including:

- Financial capacity and stability
- Management and administrative performance
- Reporting accuracy and timeliness
- History of compliance findings or complaints (e.g., ADA, civil rights)
- Condition and use of federally-funded assets
- Prior technical assistance and review outcomes

This evaluation informs the frequency, depth, and format (onsite or remote) of oversight activities.

2. Site Visit and Vehicle Inspection

UTA will perform site visits to help ensure compliance, improve performance, and reduce subrecipient risk. The frequency of this compliance monitoring is based on the subrecipients level of risk, but for medium risk agencies it is typically every two years. Reviews may also be completed remotely if:

- a subrecipient's risk assessment supports such
- events beyond UTA's control warrant such

The purpose of compliance monitoring is to assure compliance with applicable state and federal requirements and the subrecipient agreement. Monitoring is intended to assist subrecipients to build technical capacity, maintain a state of good repair, and provide technical assistance. UTA also uses findings from the reviews to develop its annual training program.

> **Commented [AL106]:** What could this be referring to?
> **Commented [TY107R106]:** ADA
> **Commented [DW108R106]:** Correct!

> **Commented [JB109]:** UTA to confirm or add to this.

UTA will perform vehicle inspections on a biennial basis regardless of risk level.

Technical assistance and compliance monitoring identify corrective actions and provide recommendations on:
- Adherence to FTA program requirements
- Financial and grant management practices
- Vehicle maintenance procedures and warranty tracking
- Title VI and ADA compliance
- Eligibility of expenditures and local match sources
- Implementation of the locally developed Coordinated Plan

After the site visit is complete, UTA sends the subrecipient a formal letter with the findings and/or recommendations. The letter identifies the findings, communicates the issues, and makes recommendations. It also includes a time frame in which the subrecipient must come into compliance, typically 30 days. If it is an urgent matter, it may require more immediate attention. Other items may require the subrecipient to write their own Corrective Action Plan (CAP) and UTA will hold them to that plan. Failure to address the recommendations within the time given will result in a change of risk score, or further action may be taken to ensure safety and compliance. Further details are provided in the Post-Award Management Guide.

Other Regulations and Guidance Areas

ADA Section 504 of the Rehabilitation Act of 1973 and ADA of 1990

UTA and its subrecipients are required to comply with the Section 504 of the Rehabilitation Act of 1973 and ADA of 1990, as amended, and associated USDOT regulations. Under USDOT regulations implementing the ADA, UTA and all subrecipients must comply with 49 CFR Parts 27, 37, and 38 implementing the ADA. These regulations prohibit discrimination on the basis of disability in transportation programs and services that receive federal financial assistance. They require both public and private transportation providers to ensure that services are accessible and equitable for individuals with disabilities.

UTA

To implement these regulations, UTA adopted and implemented policies that prohibit discrimination based on disability in all programs and services. UTA ensures that transit services (buses, rail, paratransit, etc.) are accessible to individuals with disabilities. This includes physical accessibility (e.g., lifts, ramps, signage) and communication accessibility (e.g., announcements, alternative formats). UTA also ensures that new construction and alterations comply with applicable accessibility standards (e.g., ADA Standards for Accessible Design) and existing facilities are made accessible unless doing so would impose an undue financial or administrative burden. UTA maintains reasonable modification policies to ensure that it can make accommodations to patrons accessing its services. UTA provides ongoing staff training on assisting passengers with disabilities and operating accessibility equipment properly.

Commented [AL110]: I think we should move this section down below under Subrecipeint Programs. It doesn't make sense to me to have this here with no Title VI section, since we require both plans, and the complaint posters include both.

Commented [DW111R110]: This is more so a Section 504 required topic area in the circular. I updated the title to clarify.

UTA has developed and implemented an ADA complaint process, which is publicly available on its website. Additionally, UTA has designated an ADA Coordinator responsible for managing the complaint process and ensuring ADA-related concerns are addressed. Contact information for the ADA Coordinator is also posted on the UTA website. UTA retains copies of ADA complaints for at least one year and maintains a complaint log or summary for five years.

Subrecipients

Subrecipients must develop and maintain an ADA Demand Response Service Plan which includes policies and procedures that address reasonable modification requests, ADA complaint resolution, and accessible public information (UTA offers a guide for subrecipients to assist with development). UTA reviews subrecipient ADA compliance practices during compliance monitoring and provides ongoing guidance to ensure conformance with federal requirements.

Key elements of the ADA Demand Response Service Plan require that subrecipients must:

- Post ADA rights notification posters inside each Section 5310 vehicle, and in public areas such as waiting rooms or websites
- Develop and publicize procedures for addressing ADA complaints that incorporate due process and ensure prompt, equitable resolution
- Post process for filing ADA-related complaints through means such as the website and communicate a response promptly to complainants
- Designate an ADA Coordinator, and make their name or title, telephone number, physical address, and email address publicly accessible
- Retain copies of ADA complaints for at least one year and maintain a complaint log or summary for five years.

Civil Rights – UTA Programs

UTA is committed to ensuring that its programs and activities are administered in accordance with federal civil rights requirements. UTA is responsible for implementing the requirements for DBE, Title VI, and EEO in accordance with 49 CFR Parts 21, 26, and 27.

UTA manages its civil rights programs through its Office of Civil Rights, which oversees compliance with federal and state nondiscrimination laws. Responsibilities of UTA's Civil Rights Office include:

1. Title VI Compliance

Ensure that UTA services are provided without discrimination based on race, color, or national origin and manage the Title VI Program and complaint procedures.

2. ADA Oversight

Ensure accessibility of transit services and facilities and review ADA plans and coordinate with subrecipients.

3. EEO Program

Commented [AL112]: We have required that they designate an officer for complaints and have their own complaint process, and they put our Civil Rights email address on the posters as well but they should take complaints directly. I was not aware they could just reference to our complaint process, is this true? Also we were asked by the previouse coordinator to not list the ADA coordinator directly on our complaint posters, so we just have a civil rights department email address.

Commented [DW113R112]: This section is about UTA. The below is for the subrecipients. I added headers to make it clear.

Commented [AL114]: I still have not received any confirmation from Kenyas team. See if Tracy can get someone to review and respond?

Commented [AL115]: We provide them with an ADA template for an ADA Plan that NRTAP developed for demand response transportation providers. We require that they have this, and it outlines all of these and more. How can we word this to include that plan, or so that they understand the plan we require them to have contains all the required things.

Commented [DW116R115]: Can you share a sample plan?

Commented [DW117R115]: So I don't see where the two conflict. I like the discussion of the service plan above. See how I changed the intro.

Promote a workplace free from discrimination and harassment and oversee hiring practices and employee training.

4. DBE Program

Support participation of disadvantaged and small businesses in UTA contracts and ensure compliance with federal DBE regulations.

5. Complaint Management

Accept and investigate civil rights complaints and provide multiple channels for submitting complaints (online, email, in-person).

6. Training and Outreach

Conduct civil rights training for staff and subrecipients and participate in public outreach events to promote awareness.

Civil Rights – Subrecipient Programs

1. DBE

UTA maintains a DBE program in accordance with 49 CFR Part 26. While subrecipients are not required to maintain their own DBE programs, they must comply with UTA's program requirements. In setting its triennial goal, UTA reviews whether there will be any contracting opportunities with the funds awarded to subrecipients. As part of grant award, UTA determines if a subrecipient's projects were included in the goal determination and highlights such for the subrecipient. UTA works with subrecipients to encourage DBE participation in areas such as outreach, monitoring, and enforcement. UTA monitors DBE utilization through procurement reviews, reporting, and compliance check-ins.

All subrecipient solicitations and third party contracts must include applicable DBE provisions.

2. Title VI Programs

Subrecipients are required to develop and implement a Title VI program that addresses the applicable required elements under FTA's Title VI Circular 4702.1 (Title VI Requirements and Guidelines for Federal Transit Administration Recipients). UTA reviews implementation of the plans during compliance monitoring. Updated plans are to be submitted every three years.

3. EEO Programs

Subrecipients are required to develop abbreviated or full EEO programs if they have 50 or more transit-related employees and receive more than $1 million in FTA capital and/or operating funds or more than $250,000 in planning funds in a previous federal fiscal year. Subrecipients update their program at a minimum every four years, as required by UTA, and submit it to UTA for review and approval. Implementation of the EEO Program is verified as part of UTA's compliance monitoring.

Subrecipients that do not meet the FTA EEO Program thresholds are not required to submit an EEO Program, but they are still required to comply with all applicable EEO statutes and regulations. This includes having a process for accepting, investigating,

Commented [DW118]: Please confirm
Commented [AL119R118]: We can keep this here, but non of our subs are required to do this because tehir drivers are not "transit related" employees from my understanding of the definition. So we just require them to have EEO statements on their website.

and resolving EEO complaints including directing individual complaints to the Equal Employment Opportunity Commission (EEOC) (required under 29 CFR Part 1691). Employers must post EEO notices visible to employees, applicants for employment and union members (29 CFR Section 1601.30). As a best practice, subrecipients that do not meet the thresholds triggering an FTA EEO Program should nonetheless adopt an EEO statement of policy, disseminate the policy internally and externally and designate an EEO officer.

UTA also provides technical assistance and sample materials to help eligible subrecipients develop compliant EEO Programs and maintain nondiscriminatory employment practices.

Other FTA Requirements

Mandatory Disclosures
Subrecipients must promptly notify UTA whenever, in connection with the grant, it has credible evidence of the commission of a violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations found in Title 18 of the United States Code (U.S.C.) or a violation of the civil False Claims Act (31 U.S.C. 3729-3733). Subrecipients must also report to UTA information on civil, criminal, or administrative proceedings in accordance with Appendix XII to Part 200—Award Term and Condition for Recipient Integrity and Performance Matters.

The disclosure must be made in writing to UTA. UTA will promptly disclose such matters to the FTA and FTA's Office of Inspector General.

Required Certification for Financial Reports and Invoices
In accordance with 2 CFR § 200.415, all financial reports and reimbursement requests submitted by subrecipients to UTA must include the following certification statement:

> *"By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the Federal award."*

This certification is required to ensure accountability and compliance with federal award terms. Subrecipients must ensure that a person with the appropriate financial authority signs each report or invoice submitted to UTA. Failure to include this certification may result in delayed payment processing or rejection of the invoice.

UTA's invoicing system includes this required certification statement and requires subrecipients to acknowledge it at the time of submission. Therefore, no additional certification is needed for invoices submitted through the system. However, for financial reports submitted outside of the invoicing system—such as annual audits or financial statements—subrecipients must either use a UTA-provided coversheet that includes the certification language or include the exact statement within the document itself. UTA will provide guidance and a certification template as needed to ensure compliance with federal requirements.

Commented [LA120]: I did not see any sections mentioning this new requirement, so I added it here. Please give me feedback if you think it should be tied into the financial management section instead, or the audit section.

Lobbying

Subrecipients must also comply with Byrd Anti-Lobbying Amendment (31 U.S.C. 1352), restrictions on lobbying requirements.

If a subrecipient uses non-federal funds for lobbying, UTA obtains and submits to FTA an initial disclosure form, Standard Form LLL (SF-LLL). UTA obtains and submits updated disclosure forms in any quarter in which an event (as listed below) occurs that requires disclosure, or that materially affects the accuracy of the information contained in any disclosure form previously filed.
- A cumulative increase of $25,000 or more in the amount paid or expected to be paid for influencing or attempting to influence a "covered Federal action"
- A change in the person(s) or individual(s) attempting to influence a covered Federal action
- A change in the officer(s), employee(s), or member(s) contacted to attempt to influence a covered Federal action

Suspension/Debarment

To prevent fraud, waste and abuse in federal transactions, persons or entities, which by defined events or behavior potentially threaten the integrity of federally-administered non-procurement programs, are excluded from participation in FTA-assisted programs.

All subrecipients must certify that their agency is not excluded from federally-assisted transactions and ensure that none of its principals (as defined in the governing regulation, 2 CFR Part 180), subrecipients, or third-party contractors or subcontractors are debarred, suspended, ineligible or voluntarily excluded from participation in federally-assisted transactions. UTA also confirms subrecipients' certification and checks for exclusions via SAM.Gov.

Whistleblower Protections

Subrecipients must inform their employees in writing of employee whistleblower rights and protections under 41 U.S.C. 4712.

Charter and School Bus Service Restrictions

UTA does not permit the use of Section 5310-funded equipment or services for charter service or school bus operations, in accordance with FTA regulations.

Charter services are generally prohibited under 49 CFR Part 604, and school bus service is restricted under 49 CFR Part 605. Exceptions may be granted only in limited circumstances explicitly outlined in the FTA circular or federal regulations and must be pre-approved by UTA and/or the FTA. Subrecipients are responsible for ensuring compliance with these restrictions and must not use federally-funded assets for any activities that would violate charter or school bus service regulations.

Drug and Alcohol Program

Subrecipients of Section 5310 funds are not currently required to maintain a full drug and alcohol testing program under FTA regulations. In addition, UTA does not award vehicles requiring a Commercial Driver's License (CDL), and no current subrecipients

Commented [AL121]: I know we have a lobbying clause in our agreements that they must sign. Ive never had a subreipient report lobbying.

Commented [DW122R121]: Will need to implement a process for this then.

Commented [AL123R121]: How do you mean? A process for lobbying? I thought the clause and form in our agreements where they have to report it at the time they sign is enough.

Commented [DW124R121]: Not sure I follow your question.

Commented [AL125R121]: My question is what process do you mean we need to implement?

Commented [TY126]: Should we include that you check for suspension and debarment? Even though they certify?

Commented [AL127R126]: Yes

Commented [DW128R126]: Love it.

Commented [TY129]: I would prefer that we don't allow charter service.

Commented [DW130R129]: We can work this to say you don't allow it once you are clear.

Commented [AL131R129]: We do not, but there is a caveat somewhere about government needs, so we would just say "UTA does not allow charter service, except in required instances covered in 49 CFR….

Commented [AL132R129]: Discuss at meeting if you like what I have written.

Commented [AL133]: Do we have to mention tripper service? It seems unrelevant if we do not do this.

Commented [TY134]: But we don't check this for compliance? And it's not required under 5310. It is a separate regulation that they follow - maybe this should just be an advisory section. The way it is worded it indicates that the requirements if under 5310?

Commented [DW135R134]: Any of your subs with CDL drivers will need to comply.

Commented [AL136R134]: We do not offer CDL required vehicles. Even the cutaway buses we procure are too small to require CDL.

operate CDL-classified vehicles that would require compliance with Federal Motor Carrier Safety Administration (FMCSA) regulations. However, should a subrecipient procure a vehicle requiring a CDL or employ CDL drivers in the future, they would be subject to the drug and alcohol testing requirements under 49 CFR Parts 40 and 382. In such cases, subrecipients must implement a compliant drug and alcohol testing program and notify UTA to ensure appropriate oversight and reporting.

Commented [JB137]: If UTA's 5310 program does not fund construction or facility-based projects, and only purchases vehicles and equipment, you are not obligated to include this section. But if it aligns with UTA wide broader environmental goals- absolutely keep it.

Commented [LA138R137]: This would be in their agreement.

Commented [JB139]: Does this align with UTA? Meaning does UTA fund or encourage alternative fuel vehicles under the 5310 program? This would be like the LowNo program or battery, electric, CNG, hybrid… Executive order 14008 clean transit initiatives.

Commented [AL140R139]: @Young, Tracy (Grants Director) Would you like to keep this here? I don't know if we encourage it, but we will fund it if the subrecipient wishes.

Commented [TY141R139]: We have funded an electric vehicle but I would change it from encourages to alternative fuel vehicle rquests will be considered.

Commented [LA142R139]: I would rather keep federal clauses in teh grant agreement only, because they change.

References

References	Hyperlinks
29 U.S.C. Section 504 of the Rehabilitation Act of 1973	https://www.govinfo.gov/content/pkg/CFR-2002-title28-vol1/html/CFR-2002-title28-vol1-sec35-104-.htm
31 U.S.C. 1352, Limitation on use of appropriated funds to influence certain Federal contracting and financial transactions	https://www.govinfo.gov/link/uscode/31/1352
31 U.S.C. 3729 False Claims	https://uscode.house.gov/view.xhtml?req=granuleid:USC-1999-title31-section3729&num=0&edition=1999
31 U.S.C. 3730 Civil Actions for False Claims	https://uscode.house.gov/view.xhtml?req=granuleid:USC-2000-title31-section3730&num=0&edition=2000
31 U.S.C. 3731 False Claims Procedure	https://uscode.house.gov/view.xhtml?req=granuleid:USC-1999-title31-section3731&num=0&edition=1999
31 U.S.C. 3732 False Claims Jurisdiction	https://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title31-section3732&num=0&edition=prelim
31 U.S.C. 3733 Civil Investigative Demands	https://uscode.house.gov/view.xhtml?req=(title:31%20section:3733%20edition:prelim)
41 U.S.C. 4712 Enhancement of contractor protection from reprisal for disclosure of certain information	https://www.gpo.gov/fdsys/pkg/CFR-2010-title49-vol7/pdf/CFR-2010-title49-vol7-part604.pdf
49 USC 5310: Formula grants for the Enhanced Mobility of Seniors and Individuals with Disabilities	https://uscode.house.gov/view.xhtml?req=granuleid:USC-2012-title49-section5310&num=0&edition=2012
49 U.S.C. 5329(d), Public Transportation Safety Program	https://www.govinfo.gov/content/pkg/USCODE-2023-title49/pdf/USCODE-2023-title49-subtitleIII-chap53-sec5329.pdf
49 U.S.C. 5335, National Transit Database	https://www.govinfo.gov/content/pkg/USCODE-2011-title49/html/USCODE-2011-title49-subtitleIII-chap53-sec5335.htm
2 CFR Part 170, Reporting Subaward and Executive Compensation Information	https://www.ecfr.gov/current/title-2/part-170

References	Hyperlinks
2 CFR Part 180 OMB Guidelines to Agencies on Government-Wide Debarment and Suspension (Nonprocurement)	https://www.ecfr.gov/current/title-2/subtitle-A/chapter-I/part-180
2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards	https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200?toc=1
2 CFR Part 200, Subpart F Audit Requirements	https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-F
2 CFR Part 200, Appendix XII to Part 200, Award Term and Condition for Recipient Integrity and Performance Matters	https://www.ecfr.gov/current/title-2/part-200/appendix-Appendix XII to Part 200
29 CFR Part 1601.30, Notices to be posted	https://www.ecfr.gov/current/title-29/section-1601.30
29 CFR Part 1691, Procedures for Complaints of Employment Discrimination Filed Against Recipients of Federal Financial Assistance	https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title29/29cfr1691_main_02.tpl
49 CFR Part 20 New Restrictions on Lobbying	https://www.ecfr.gov/current/title-49/subtitle-A/part-20
49 CFR Part 21, Nondiscrimination in Federally-assisted Programs of the Department of Transportation – Effectuate of Title VI of the Civil Rights Act of 1964	https://www.ecfr.gov/current/title-49/part-21
49 CFR Part 24 Uniform Relocation Assistance and Real Property Acquisition Policies for Federal and Federally Assisted Programs	https://www.ecfr.gov/current/title-49/part-24
49 CFR Part 26, Participation by Disadvantaged Business Enterprises in Department of Transportation Financial Assistance Programs	https://www.ecfr.gov/current/title-49/subtitle-A/part-26?toc=1
49 CFR Part 27, Nondiscrimination on the Basis of Disability in	https://www.ecfr.gov/current/title-49/subtitle-A/part-27?toc=1

References	Hyperlinks
Programs or Activities Receiving Federal Financial Assistance	
49 CFR Part 37, Transportation Services for Individuals with Disabilities	https://www.ecfr.gov/current/title-49/subtitle-A/part-37
49 CFR Part 38, ADA Accessibility Specifications for Transportation Vehicles	https://www.ecfr.gov/current/title-49/subtitle-A/part-38?toc=1
49 CFR Part 40, Procedures for Transportation Workplace Drug and Alcohol Testing Programs	https://www.ecfr.gov/current/title-49/subtitle-A/part-40
49 CFR Part 382, Controlled Substances and Alcohol Use and Testing	https://www.ecfr.gov/current/title-49/subtitle-B/chapter-III/subchapter-B/part-382
49 CFR Part 604, Charter Service	https://www.govinfo.gov/content/pkg/CFR-2010-title49-vol7/pdf/CFR-2010-title49-vol7-part604.pdf
49 CFR Part 605, School Bus Operations	https://www.ecfr.gov/current/title-49/part-605
49 CFR Part 625, Transit Asset Management	https://www.ecfr.gov/current/title-49/part-625
49 CFR Part 661 Buy America Requirements	https://www.ecfr.gov/current/title-49/subtitle-B/chapter-VI/part-661
49 CFR Part 663 Pre-award and Post-delivery Audits of Rolling stock Purchases	https://www.ecfr.gov/current/title-49/subtitle-B/chapter-VI/part-663
49 CFR Part 665 Bus Testing	https://www.ecfr.gov/current/title-49/subtitle-B/chapter-VI/part-665
Buses and Bus Facilities Program (Section 5339)	https://www.transit.dot.gov/bus-program
Enhanced Mobility of Seniors and Individuals with Disabilities Program (Section 5310)	https://www.transit.dot.gov/regulations-and-guidance/fta-circulars/formula-grants-rural-areas-program-guidance-and-application
FTA Circular 4220.1, Third Party Contracting Guidance	https://www.transit.dot.gov/sites/fta.dot.gov/files/2025-01/Third-Party-Contracting-Guidance-%28Circular-4220.1G%29.pdf
FTA Circular 4702.1, Title VI Requirements and Guidelines for FTA Recipients	https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf

References	Hyperlinks
FTA Circular 4704.1 Equal Employment Opportunity (EEO) Act Guidance	https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/eeo-circular
FTA Circular 9070.1, Enhanced Mobility of Seniors and Individuals with Disabilities Program Guidance	https://www.transit.dot.gov/sites/fta.dot.gov/files/2024-10/C9070.1H-Circular-11-01-2024.pdf
System of Award Management	https://sam.gov/
Utah Code Title 51, Chapter 7 – State Money Management Act	https://le.utah.gov/xcode/Title51/Chapter7/C51-7_1800010118000101.pdf
Utah Code Title 63G, Chapter 6a — Utah Procurement Code	https://le.utah.gov/xcode/Title63G/Chapter6A/63G-6a.html
Utah Senate Bill 136, Transportation Governance Amendments	https://le.utah.gov/~2018/bills/static/SB0136.html

Revision History

With the passage of MAP-21 (Moving Ahead for Progress in the 21st Century) in July 2012, funds previously allocated to state agencies under 49 U.S.C § 5310, were now allocated to large urbanized areas. UTA, as the designated recipient of the Ogden/Layton, Salt Lake and Provo/Orem large urbanized area, is responsible for administering the program funds. As a result, UTA must comply with FTA Circular 9070.1, *Enhanced Mobility of Seniors and Individuals with Disabilities Program Guidance,* which requires that designated recipients adopt policies and procedures to be used in administering the FTA grant programs and to develop a program management plan describing the designated recipient's policies and procedures for the program. This document was developed to adhere to these requirements.

Revision 1: 2020

The 2015 PMP was amended to accomplish the following objectives:
- Incorporate FTA's updates to its guidance documents promulgated by the five-year authorization bill Fixing America's Surface Transportation Act.
- Reflect the flexibilities and administrative relief provided under the Coronavirus Response and Relief Supplemental Appropriations Act of 2021 and the American Rescue Plan Act of 2021 funding provisions.

Revision 2: 2025

The 2020 PMP was amended to accomplish the following objectives:
- Organize the plan into three (3) main topic areas:
    - UTA's Roles and Responsibilities
    - Program Policies
    - Program Management
- Streamline the plan to only address UTA-specific policies and any changes resulting from grantor requirements
- Remove redundancy and inconsistency in program policies and align with FTA required plan contents.
- Reference external documents that outline UTA procedures for implementing its policies and/or to support various elements of the plan.
- Update policies affected by the requirements associated with the Infrastructure Investment and Jobs Act (IIJA).
- Include the most recent updates to the CFRs and FTA's implementing guidance provided in the updates to the following circulars:
    - FTA C. 4220.1 Third Party Contracting Guidance
    - FTA C. 5010.1 Award Management Requirements
    - FTA C. 9040.1 Rural Areas Formula Grants Program Guidance
    - FTA C. 9070.1 Enhanced Mobility of Seniors and Individuals with Disabilities Program Guidance
- Incorporate edits and corrections to promote clarity.

No other significant changes were made.

DRAFT#2 10/10/2025