

# Appendix L: Subrecipient Monitoring Plan

## Sacramento Regional Transit District

### Subrecipient Monitoring Plan

#### 1.0 PURPOSE

SacRT is responsible to provide a schedule of subrecipient Title VI Program submissions and is required to monitor subrecipients for compliance with their Title VI Programs and Section 5307 requirements. When a subrecipient is also a direct recipient of FTA funds, then that entity reports directly to FTA and SacRT is not responsible for monitoring compliance of that subrecipient.

SacRT passes through federal funds from FTA to eight subrecipient agencies, four of which are also direct FTA recipients and therefore report federal compliance activities directly to FTA. In accordance with SacRT's annual certifications and assurances, SacRT monitors subrecipient compliance with applicable federal rules and regulations, including Title VI for non-direct FTA recipients, and Section 5307 for all recipients.

To ensure that SacRT and its subrecipients are following Title VI and Section 5307 requirements, SacRT's Planning department has developed a Subrecipient Monitoring Plan to assist in proper monitoring for these two specific areas. The plan directs monitoring steps, including information about:

- Tracking and recording subrecipient status;
- Use of checklist forms and templates;
- Analyzing and documenting findings; and
- Monitoring frequency,

#### 2.0 PROCESS

New subrecipient information is provided upon the execution of a subrecipient agreement with SacRT Grants division. Grants staff will communicate with Planning staff of subrecipient status changes.

Grants staff maintains a 'Subrecipient List & Status' tracking spreadsheet. This tracker includes a list of subrecipients and full program status, and it identifies which sections of monitoring applies; shown in **Figure 1**.

The tracker is shared with all divisions that are responsible to monitor subrecipients. SacRT Planning staff is responsible to monitor the following sections:

- Title VI requirements;
- Section 5307 requirements (partial);
- School bus service requirements; and
- Charter bus service requirements.

**Figure 1. Subrecipient List & Status**

Subrecipient Monitoring List				AREAS Requiring Monitoring															
* Direct FTA Recipient * Contact Information				GRANTS	GRANTS	GRANTS/ENG.	GRANTS	BM/FACIL.	PROCURE	DBE	PLANNING	ASI/ENG.	AS	LEO	PLANNING	PLANNING	LABOR REL.	PLANNING	
Subrecipient	Active	ID#	Project(s) Description	Section 1	Section 2	Section 4	Section 6	Section 7	Section 8	Section 9	Section 10	Section 11	Section 12	Section 13	Section 14	Section 15	Section 16 & 17	Section 18	
				Legal (All subrecipients)	Financial Management and Capacity (All subrecipients)	Technical Capacity - Project Management (All Subrecipients)	Satisfactory Continuing Control (All subrecipients)	Maintenance (All subrecipients but type of review depends on project)	Procurement (All subrecipients)	DBE (Subrecipients with over \$200k in FTA contracting opportunities)	Title VI (All subrecipients)	ADA - General (Subrecipients with FTA funded facilities or service)	ADA - Compl. Paratransit (Subrecipients with fixed route service [and DR for JARC/NFI])	ADA - Compl. Paratransit (Subrecipients with 50+ transit employees and \$1M FTA capital/ops or \$25M in plan.)	School Bus (Subrecipients who operate School Bus Service)	Charter Bus (Subrecipients who operate Charter Bus Service)	Drug & alcohol Program (Subrecipients with safety sensitive employees)	Program Requirements (All subrecipients)	
				Req	Date	Req	Date	Req	Date	Req	Date	Req	Date	Req	Date	Req	Date	Req	Date
City of Citrus Heights	Yes		Bus Stop Improvements	Y		Y		Y		Y		N		Y		N		Y	
City of Folsom	Yes	Q053	Preventive Maintenance	Y		Y		Y		Y		N		Y		Y		Y	
City of Placerville	Yes		Park-and-Ride Lot	Y		Y		Y		Y		Y		Y		N		Y	
City of Sacramento	Yes		Intermodal Facility - Preliminary Engineering - Structural Retrofit - Sprinkler Retrofit - Final Design Phase 2 Project Completed	Y		Y		Y		Y		Y		Y		N		Y	
El Dorado Transit	Yes	Q057	Purchase Buses	Y		Y		Y		Y		Y		Y		Y		Y	
		Q058	Preventive Main	Y		Y		Y		Y		Y		Y		Y		Y	
		Q059	Automatic Bus Washer	Y		Y		Y		Y		Y		Y		Y		Y	
		Q062	Preventive Main	Y		Y		Y		Y		Y		Y		Y		Y	
		Q063	COVID-19 Ops	Y		Y		Y		Y		Y		Y		Y		Y	
		Q066	Bus Replacement	Y		Y		Y		Y		Y		Y		Y		Y	
		Q067	Preventive Main	Y		Y		Y		Y		Y		Y		Y		Y	
Paratransit, Inc.	Yes	Q050	Bus Purchase	Y		Y		Y		Y		Y		Y		N		Y	
		Q043	Travel Training																
		Q056	Mobility Management																
		Q064	COVID-19 Ops																
SACOG	Yes	Q052	Connect Card	Y		Y		N		Y		N/A		N		N		N	
Yuba Sutter Transit	Yes	Q024	Purchase Buses	Y		Y		Y		Y		N/A		Y		Y		Y	

SacRT’s Planning department partners with Grants staff to monitor Section 5307 requirements. Planning staff is responsible for making sure each subrecipient has a written, locally developed process for soliciting and considering public comments before raising a fare or carrying out a major transportation service reduction and is implementing half-fares for the elderly and disabled communities. Grants staff is responsible for making sure each subrecipient is developing, publishing, and providing the opportunity for a public hearing on a Program of Projects (POP).

**2.1 Program review**

Once Planning staff is alerted of a subrecipient, a full program review is conducted to ensure compliance with Title VI and Section 5307 (if applicable). Staff requests program documents from each subrecipient and completes a *Title VI Program Checklist*. The checklist is a step-by-step review process that provides a record of determinations for each program that is monitored (**Attachment 1**).

Staff will then document the review and findings from the checklist in the ‘Subrecipient Monitoring Record’, shown in **Figure 2**. The monitoring record includes each subrecipient’s status and items that need to be addressed through communication with the program coordinators.

**Figure 2. Subrecipient Monitoring Record**

SUBRECIPIENT MONITORING TITLE VI, 5307 (partial), SCHOOL BUS & CHARTER BUS									
Subrecipient	Active Subrecipient	Required to Monitor	Requirement to Prepare & Submit a Title VI Program to RT every 3yrs (Ch 3 & Ch 4 requirements- if applicable)	Section 5307 Requirement for: Half-fare & Public Comment Process for Fare Increase/Major Service Reduction	School/Trupper Bus Service	Charter Bus Service	Agency/Project Notes	Findings/Compliance Notes	ACTION ITEMS
City of Folsom	Yes	*Sec. 5307	Ch 3 requirements  5.27.22-no longer receiving transit funding; no T6 monitoring required	N/A - recipient does not provide fixed-route transit service	N/A	N/A	City of Folsom transit service was annexed by SacRT in 2019; subject to Ch. 3 reqs only.	*Conducted web site check in 2019; observed online translation per LAP	Last program submitted in 2015; deficiencies found; program underwent several edits to bring the plan to compliance; final plan approved in 2017; next plan due 2020
City of Sacramento	Yes	*Title VI	Ch 3 requirements	N/A - recipient does not provide fixed-route transit service	N/A	N/A	Agency does not operate transit services. Project consists of preliminary engineering and design for structural and building improvements to an existing depot facility; including relocating/reconfiguring bus berths, vehicle and bike parking, and the light rail transit (LRT) station; refurbishing/rehabilitating the depot building; and providing passenger connection enhancements.	*Conducted site visit in 2018; observed posted Title VI notice in elevator	Last program approved in 2016; expired 2019; next update has been requested; awaiting submittal.  5.27.22-email sent to new contact, Jesse Gothan, requesting updated program; letter drafted  Nov22- program received; findings from checklist; requested revisions to bring program to compliance
City of Citrus Heights	Yes	*Title VI	Ch 3 requirements	N/A - recipient does not provide fixed-route transit service	N/A	N/A	Agency does not operate transit service, subject to Ch. 3 reqs only. Project is for transit enhancements to existing bus stops.	*Conducted web site check in 2019; observed Title VI complaint form online	Approved June 2021; next update due 2024
El Dorado Transit	Yes	*Title VI *Sec. 5307	Ch 3 requirements	Verified by SP 4/9/18	N/A	N/A	Does not operate 50 or more fixed route vehicles in peak service.	Areas in compliance: *Title VI *Sec. 5307	Program approved December 2019; next program due in December 2022
Yuba-Sutter Transit	Yes	*Sec. 5307	N/A - direct recipient	Verified by SP 7/19/18	N/A	N/A	YST is a direct recipient of FTA. Per Federal Register Vol. 77, No. 167 August 28, 2012 Notices page 52123 direct recipients are responsible for reporting to FTA and the primary recipient is not responsible for Title VI monitoring compliance of that subrecipient.	Areas in compliance: *Sec. 5307	
City of Elk Grove	Yes	*Sec. 5307	N/A - direct recipient	Verified by SP 7/19/18	N/A	N/A	The City of Elk Grove is a direct recipient of FTA. Per Federal Register Vol. 77, No. 167 August 28, 2012 Notices page 52123 direct recipients are responsible for reporting to FTA and the primary	Areas in compliance: *Sec. 5307	

**2.2 Quarterly Monitoring-**

Title VI subrecipient monitoring is included in SacRT’s Strategic Plan as a quarterly milestone. Performance and tactics for monitoring efforts are reported every quarter as a Planning department metric. Each quarter, SacRT completes a ‘Subrecipient Checklist Form’ (**Attachment 2**) to ensure compliance for one agency per quarter, and records any findings into the monitoring record. Staff will then report on the monitoring activities and any findings to the division.

In addition to checklists, SacRT intends to conduct site visits as a method of monitoring subrecipients; however, staff has been prevented from using this method due to the COVID-19 pandemic forcing office closures and/or limiting access to sites. All monitoring efforts have been completed via web and phone. Staff is prepared to begin site visits as locations become accessible for in-person monitoring.

**3.0 COMMUNICATION**

Regular contact with subrecipients is necessary to obtain the most current information, to request additional or clarifying information, or to address red flags that may need to be addressed. At least once a year, the agency contact information is verified to ensure all information is correct.

**3.1 Subrecipient Contact Schedule-**

Once Planning staff has reviewed subrecipient submitted material, staff may offer assistance and recommendations to strengthen the subrecipients Title VI Program, including corrective actions. A compliance review letter or email is issued following the completion of a review. The compliance review letter or email will provide proposed action plan to correct deficiencies. If there are no deficiencies, the review will be complete.

For regular monitoring activities and requests for information, staff follows a contact schedule shown in **Figure 3**.

**Figure 3. Subrecipient Contact Schedule**

Send correspondence approximately 12 months prior to program expiration as reminder that program will be expiring. Provide expiration date and request update by due date.
Send correspondence approximately 6 months prior to expiration as a reminder that program will be expiring. Provide expiration date and request update by due date.
Send correspondence approximately 3 months prior to expiration date. Request program be submitted by due date.
Send correspondence approximately 30 days prior to expiration date. Request program be submitted by due date.

If programs are received with deficiencies, staff will draft correspondence addressing items to be corrected. If programs have not been received before expiration, staff will draft correspondence providing notice that federal funding may be withheld.

In addition to scheduled contact, staff will communicate with subrecipients during quarterly reviews for any issues needing resolution.

**Attachment 1**

**TITLE VI PROGRAM CHECKLIST**

Every three years, on a date determined by FTA, each recipient is required to submit the following information to the Federal Transit Administration (FTA) as part of their Title VI Program. Subrecipients shall submit the information below to their primary recipient (the entity from whom the subrecipient receives funds directly), on a schedule to be determined by the primary recipient.

**General Requirements (Chapter III)**

*All recipients must submit:*

- Title VI Notice to the Public, including a list of locations where the notice is posted
- Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
- Title VI Complaint Form
- List of transit-related Title VI investigations, complaints, and lawsuits
- Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
- Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance
- A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
- Primary recipients shall include a description of how the agency monitors its subrecipients for compliance with Title VI, and a schedule of subrecipient Title VI Program submissions
- A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.
- A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOT's, the appropriate governing entity is the State's Secretary of Transportation or equivalent. The approval must occur prior to submission to FTA.
- Additional information as specified in chapters IV, V, and VI, depending on whether the recipient is a transit provider, a State, or a planning entity (see below)

**Requirements of Transit Providers (Chapter IV)**

*All Fixed Route Transit Providers must submit:*

- All requirements set out in Chapter III (General Requirements)  
Service standards

## FTA C 4702.1B

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- Vehicle load for each mode
- Vehicle headway for each mode
- On time performance for each mode
- Service availability for each mode
- Service policies
- Transit Amenities for each mode
- Vehicle Assignment for each mode

*Transit Providers that operate 50 or more fixed route vehicles in peak service and are located in*

*an Urbanized Area (UZA) of 200,000 or more people must submit:*

- Demographic and service profile maps and charts
- Demographic ridership and travel patterns, collected by surveys
- Results of their monitoring program and report, including evidence that the board or other governing entity or official(s) considered, was aware of the results, and approved the analysis
- A description of the public engagement process for setting the “major service change policy,” disparate impact policy, and disproportionate burden policy
- Results of service and/or fare equity analyses conducted since the last Title VI Program submission, including evidence that the board or other governing entity or official(s) considered, was aware of, and approved the results of the analysis

### **Requirements of States (Chapter V)**

*States must submit:*

- All requirements set out in Chapter III (General Requirements)
- The requirements set out in Chapter IV (Transit Provider) if the State is a provider of fixed route public transportation
- Demographic profile of the State
- Demographic maps that show the impacts of the distribution of State and Federal funds in the aggregate for public transportation projects
- Analysis of the State’s transportation system investments that identifies and addresses any disparate impacts
- A description of the Statewide planning process that identifies the transportation needs of minority populations
- Description of the procedures the agency uses to ensure nondiscriminatory pass-through of FTA financial assistance
- Description of the procedures the agency uses to provide assistance to potential subrecipients, including efforts to assist applicants that would serve predominantly minority populations

### **Requirements of MPOs (Chapter VI)**

*Metropolitan Planning Organizations and other planning entities must submit:*

- All requirements set out in Chapter III (General Requirements)

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- The requirements set out in Chapter IV (Transit Provider) if the MPO is a provider of fixed route public transportation
- Demographic profile of the metropolitan area
  - A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process
  - Demographic maps that show the impacts of the distribution of State and Federal funds in the aggregate for public transportation projects
  - Analysis of the MPO's transportation system investments that identifies and addresses any disparate impacts
  - Description of the procedures the agency uses to ensure nondiscriminatory pass-through of FTA financial assistance (if requested)
  - Description of the procedures the agency uses to provide assistance to potential subrecipients in a nondiscriminatory manner (if requested)



## Attachment 2

**Planning Department Procedure**

Date: \_\_\_\_\_

### Subrecipient Monitoring Checklist

Agency: \_\_\_\_\_

CHECKLIST – TITLE VI	COMMENTS
<input type="checkbox"/> Verify program is current Link to page: _____ Program expiration date: _____	
<input type="checkbox"/> Verify subrecipient contact details Name and/or Title: _____ Address: _____ Phone and Email: _____	
<input type="checkbox"/> Verify Title VI Notice Is notice posted on premises    Yes <input type="checkbox"/> No <input type="checkbox"/> Is notice online and accessible?    Yes <input type="checkbox"/> No <input type="checkbox"/>	
<input type="checkbox"/> Verify Complaint Form Is form online and accessible?    Yes <input type="checkbox"/> No <input type="checkbox"/>	
<input type="checkbox"/> Verify Language Assistance Plan Are translations available in languages identified?    Yes <input type="checkbox"/> No <input type="checkbox"/>	
<input type="checkbox"/> Verify Public Participation Plan Have there been any public meetings?    Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, was public notice provided?    Yes <input type="checkbox"/> No <input type="checkbox"/>	
<input type="checkbox"/> Verify Equity Analyses Have there been any construction projects, service, and/or fare changes that would warrant an equity analysis?    Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, were analyses completed?    Yes <input type="checkbox"/> No <input type="checkbox"/>	
<input type="checkbox"/> <b>If any of these items do not meet requirements, email notice to contact listed above.</b>	

CHECKLIST – SCHOOL BUS AND CHARTER BUS SERVICE	COMMENTS
<input type="checkbox"/> Verify status of School and Charter Bus operations Operation of school bus service?    Yes <input type="checkbox"/> No <input type="checkbox"/> Operation of charter bus service?    Yes <input type="checkbox"/> No <input type="checkbox"/>  <i>If yes, the following corrective action is required</i> _____	

CHECKLIST – SECTION 5307	COMMENTS
Subrecipient name:	
Program of Projects:	
Public Participation Plan for Service/Fare Changes:	
Half Fares:	