

SBCAG FTA 5310 Program Management Plan

I. Program Background

The Federal Transit Administration's (FTA) Section 5310 (FTA 5310) Grant Program funding offers funding to non-profit organizations, state or local government authorities, and local operators of public transportation¹ to enhance the mobility and transportation services for seniors and individuals with disabilities.

Prior to 2024, Caltrans administered the FTA 5310 Grant program for Santa Barbara Urbanized Area (UZA) as it was only a small UZA. In 2020, the Santa Barbara UZA became a large UZA. FTA requires that one or more designated recipients administer FTA funds for large UZAs.

As the regional transportation planning agency for Santa Barbara County and dual-designated recipient of FTA 5310 funds in the Santa Barbara UZA alongside Santa Barbara Metropolitan Transit District (SBMTD), the Santa Barbara County Association of Governments (SBCAG) is responsible for conducting Calls for Projects. Any agencies receiving FTA 5310 funding from SBCAG will be considered subrecipients.

II. Program Goals and Objectives

This section describes the philosophy and policy underlying SBCAG's management of the FTA 5310 program, including a description of any process that exists for establishing long-term goals for providing transportation services to seniors and people with disabilities in the SBCAG's area, and the process for long range planning and consultation with elected officials.

The FTA 5310 Grant Program is intended to improve mobility for seniors and individuals with disabilities by removing barriers to transportation services and expanding the transportation mobility options available.

FTA 5310 Program Goals include:

- A. Strengthen provider resources and through a sustainable funding stream;
- B. Support the special needs of seniors and individuals with disabilities;

¹ Operators of public transportation are entities that provide regular continuing shared-ride surface transportation services that are open to the general public or open to a segment of the general public defined by age, disability, or low-income.

- C. Ensure consistent operation of safe, accessible, and affordable services for county residents; and
- D. Support the goals and objectives identified in SBCAG's Coordinated Plan.

Development of the FTA 5310 Program is closely related to the development of SBCAG's Coordinated Public Transit – Human Services Transportation Plan (Coordinated Plan), which establishes long term goals and planning for older adults, individuals with disabilities, and other people facing mobility challenges in Santa Barbara County. Every 5 years, SBCAG works with local transit and paratransit providers, local agencies, and members of the public to identify key gaps and needs of the County's coordinated transit system and develops goals and strategies to address these gaps. The plan was presented and approved by SBCAG's Board of Directors (SBCAG Board), which is made up of elected officials and district representatives. Any future amendments to the Coordinated Plan will be brought before the SBCAG Board of Directors. The FTA 5310 program is a mechanism to carry out the long-term goals identified by local agencies, members of the public, and elected officials.

III. Roles, Responsibilities, and Coordination

This section specifies the agencies designated to administer the FTA 5310 program and explains the respective roles and responsibilities of SBCAG, other recipient agencies or review boards, local governments, private providers, local applicants, and other involved parties.

SBCAG and SBMTD are identified as dual designated recipients for FTA funding in the Santa Barbara UZA. SBCAG coordinates with SBMTD on the Call for Projects process, including guidelines and application development, scoring project applications, and developing the Program of Projects for each cycle.

Throughout the process, SBCAG presents updates to the Santa Barbara County Transportation Advisory Committee (SBTAC), which serves as the region's social services transit advisory committee. The committee consists of the region's public transit providers (including CTSAs), representatives of nonprofits dedicated to meeting transportation needs of the disabled community, and the region's paratransit and dial-a-ride services. Additionally, the committee includes a transit rider with a disability' among the citizen-filled positions. SBCAG engages with SBCTAC throughout the program development process.

The guidelines and application are presented to the SBCAG Board of Directors for approval. Once applications are submitted, the Program of Projects is presented to SBCTAC and the SBCAG Board for approval and inclusion in the Federal Transportation Improvement Program.

SBCAG will also be responsible for equipment management and disposal. Per 2 CFR 200.313, if an item of equipment purchased with Federal assistance has met its minimum useful life and is sold for \$10,000 or less, the recipient may retain the full proceeds from the disposition. If the proceeds are greater than \$10,000, then, per 49 U.S.C. 5334(h)(4)(B), the recipient may retain \$5,000 and the percentage of the local share in the original Award of the remaining proceeds, with the remaining Federal share returned to FTA. In either case, selling and handling expenses are not permitted to be deducted from the amount returned or in determining the sale proceeds.

IV. Eligible Subrecipients

Subrecipients that are eligible to apply for funds include:

- A. A private nonprofit organization
- 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 there are no nonprofit organizations readily available in the area to provide the service.
- C. Operators of public transportation (Expanded projects only).

The Santa Barbara UZA has multiple nonprofit organizations that provide transit for seniors and individuals with disabilities. These organizations are also included in Santa Barbara County's Coordinated Public Transit – Human Services Transportation Plan.

V. Local Share and Local Funding Requirements

Subrecipients are responsible for providing a local match for their projects. At least 20% match using non-USDOT funds is required for traditional projects and at least 50% match using non-USDOT funds is required for expanded projects.

Toll credits may be available for subrecipients to use as the required match. Availability of toll credits is contingent upon approval of Caltrans and will vary annually.

VI. Project Selection Criteria and Method of Distributing Funds

SBCAG uses a competitive selection to determine project selection. SBCAG will use the following evaluation criteria to score and select projects with projects evaluated on a 100 point scale as shown below:

Criteria	Points
A. Goals and Objectives: Degree to which project supports new, enhancement, or expansion of service or system capacity for the targeted populations. The application should clearly state how the project addresses the program goals and the goals and service gaps identified in the Coordinated Plan.	10

B. Project Implementation Plan: Degree to which the project implementation has been well designed. Proposals must state who will be responsible for the implementation, and implementation steps and timeline. Sponsors should describe how the project will improve service delivery, coordination, and cost-effectiveness.	10
C. Communication and Outreach: Degree to which applicants coordinate with other community transportation and/or social service resources. Application should describe efforts to keep stakeholders involved in and informed of project activities. There should be demonstrated public support for the project (including letters of support), as well as a plan to promote awareness of the project to the target population.	10
D. Emergency Planning and Preparedness: Applicant should describe emergency planning and any participation in emergency drills.	10
E. Ability of Applicant: Applicant should provide existing experience in providing transportation service or social services for elderly or disabled individuals.	20
F. Transportation Service: Determination that existing fleet is fully utilized based on days and hours, passenger trips, and service area.	20
G. Proposed Project: Applicant will be scored based on project type– vehicle replacement/expansion and equipment. Replacement and expansion vehicles will receive ratings based on mileage, service hours per week, and number of people served. Equipment will be scored based on number of vehicles within the fleet which are coordinated and service efficiency enhancement with the new equipment. Operating Assistance and Mobility Management Projects will be scored based on the extent to which the applicant provides clear, measurable, and outcome-based performance measures with quantifiable methodology to track the effectiveness of the project.	20

VII. Annual Program of Projects Development and Approval Process

SBCAG will conduct a Call for Projects every two years. During each Call for Projects process, staff will update the guidelines and application and present the draft materials to the Santa Barbara County Transit Advisory Committee for comments and questions. The committee consists of the region's public transit providers, representatives of nonprofits dedicated to meeting transportation needs of the disabled community, and the region's paratransit and dial-a-ride services. Additionally, the committee includes a 'transit rider with

a disability' among the citizen-filled positions. The draft materials will also be presented to the SBCAG Board for a public hearing. Once the Board approves the guidelines and issues a Call for Projects, applicants will submit applications directly to SBCAG.

SBCAG and SBMTD, as dual-designated recipients, review the applications and develop a draft Program of Projects, which will be presented again to the Transit Advisory Committee for recommended Board approval. If voting members of the committee submit an application they will recuse themselves from discussion and voting of this item.

Once the SBCAG Board approves the Program of Projects, staff will program the projects into the Federal Transportation Improvement Program. The general timeline of the process is illustrated in the table below:

Milestone	Date
Draft Guidelines released	June 20
Comments on guidelines due	July 1
Final Guidelines approved by SBCAG Board and Call for Projects announced	July 18
Applications due to SBCAG	August 29
Program of Projects approved by SBCAG Board	October 17

VIII. State Administration, Planning, and Technical Assistance.

SBCAG uses 10% of the total available for the FTA 5310 program to conduct activities related to program administration, planning, and technical assistance. The Call for Projects is then released, with the remaining 90% of funding available for subrecipient use. Tasks include application coordination, Program of Projects development, technical assistance to subrecipients, compliance monitoring, and federal reporting. SBCAG also programs awarded projects into the FTIP and executes agreements with awarded applicants to begin the projects.

IX. Transfer of Funds

SBCAG does not participate in the transfer funds.

X. Private Sector Participation

All providers of public transportation, whether private or public, are included as stakeholders in the development of the Coordinated Plan. These providers are made aware

of the FTA 5310 funding source through this process, many of which have been previous recipients or subrecipients of these funds and rely on them annually. Many of these providers also actively participate in the Santa Barbara County Transit Advisory Committee and receive staff updates during the FTA 5310 Call for Projects process. SBCAG also reaches out to all of the stakeholders from the Coordinated Plan who are eligible for this funding.

XI. Civil Rights

All grantees are required to comply, and ensure compliance by third-party contractors, with Title VI of the Civil Rights Act of 1964, as amended and with the provisions contained in Title 49, Code of Federal Regulations (CFR), Part 21 through Appendix C and 23 CFR 710.405(b). By complying with these provisions and regulations, the grantee agrees that no person on the basis of race, color, national origin, religion, sex, or age will be unlawfully excluded from participation in or be denied the benefits of any project for which the grantee receives federal or local funding via SBCAG. Grantees are responsible to ensure meaningful access to their transportation program by limited English proficient persons.

The Equal Employment Opportunity (EEO) provision requires that all grantees provide equal employment to all people, without regard to race, color, religion, sex, national origin, or any other class of persons protected by state or federal law. SBCAG requires that its grantees, including FTA 5310 subrecipients, certify their compliance with the Equal Employment Opportunity Act and all other applicable rules, regulations, and relevant orders of the Secretary of Labor and any implementing requirements the FTA or SBCAG may issue. This certification is required prior to grant agreement execution. SBCAG does not discriminate on the basis of race, color, sex, national origin, disability, or any other class protected by state or federal law in the award and performance of any third-party contract executed under FTA 5310 program.

XII. 504 and ADA Reporting

SBCAG will require that all subrecipients agree to comply with the following requirements, if applicable, to the services funding under FTA 5310:

- A. The Americans with Disabilities Act of 1990 (ADA), 42 U.S.C. §12101 et seq.;
- B. Section 504 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. §794;
- C. Section 16 of the Federal Transit Act, as amended, 49 U.S.C. §5301 (d);
- D. U.S. DOT regulations, "Nondiscrimination on the Basis of Handicap in Programs and Activities Receiving or Benefiting from Federal Financial Assistance," 49 CFR Parts

27, 37 and 38;

- E. U.S. DOJ Regulations, "Nondiscrimination on the Basis of Disability by Public Accommodations and in Commercial Facilities," 28 CFR Part 36;
- F. U.S. General Services Administration regulations, "Accommodations for the Physically Handicapped," 41 CFR Subpart 101-19;
- G. U.S. Equal Employment Opportunity Commission (EEOC), "Regulations to Implement the Equal Employment Provisions of the Americans with Disabilities Act," 29 CFR Part 1630.

Monitoring check in visits will occur no less than annually to ensure compliance with federal requirements. Additionally, procurement activities will be reviewed prior to release of any solicitation to ensure federal compliance as well as pre/post delivery, as applicable. Follow up reviews for continuing control will be conducted annually. Such follow up reviews may include vehicle inspections, file reviews and site visits.

XIII. Program Measures

SBCAG collects reports on program measures from subrecipients annually. Due to a two-year Call for Projects, reporting deadlines are specific to the year of apportionment. The following measures are required to be reported by the subrecipient:

A. Traditional Projects

1. Gaps in Service Filled: Provision of transportation options that would not otherwise be available for seniors and individuals with disabilities, measured in numbers of seniors and individuals with disabilities afforded mobility they would not have without program support as a result of traditional FTA 5310 projects implemented in the current reporting year.
2. Ridership: Actual or estimated number of rides (as measured by one-way trips) provided annually for seniors or individuals with disabilities on Section 5310 supported vehicles and services as a result of traditional FTA 5310 projects implemented in the current reporting year.

B. Expanded Projects

1. Service Improvements: 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 FTA 5310 projects implemented in the current reporting year
2. Physical Improvements: Additions or changes to environmental infrastructure (e.g., transportation facilities, sidewalks, etc.), technology, and vehicles that impact availability of transportation services for seniors and individuals with

disabilities as a result of other FTA 5310 projects implemented in the current reporting year.

3. Ridership: Actual or estimated number of rides (as measured by one-way trips) provided annually for seniors or individuals with disabilities on FTA 5310 supported vehicles and services as a result of other FTA 5310 projects implemented in the current reporting year.

XIV. Program Management

This section describes how SBCAG administers its program management responsibilities in such areas as procurement, financial management, property management, vehicle use, maintenance and disposition, accounting systems, audit, and closeout. In addition, it includes any procedures for management or financial reviews and project monitoring or on-site reviews. It also describes any standards set by SBCAG for matters such as productivity, cost effectiveness, or service standards and details any reporting requirements.

SBCAG will develop the Program of Projects through a Call for Projects process and execute grant agreements to those sponsors who are selected as subrecipients of FTA 5310 funds. Subrecipients are responsible for providing vendor invoices for capital purchases attached to the reimbursement request.

SBCAG has a procurement policy that includes how federal funds may be used which is consistent with the Uniform Guidance Title 2, Code of Federal Regulations Part 200. SBCAG utilizes the Financial Information Network of the County of Santa Barbara for the maintenance of its books and records. Financial transactions are initiated and approved by the SBCAG, but the County of Santa Barbara Auditor-Controller performs data entry, report generation, warrant issuance, and other related functions on behalf of SBCAG. The County of Santa Barbara Treasurer deposits SBCAG's cash into the County's cash management investment pool where it is commingled and invested with the funds of other pool participants. SBCAG is not a component unit of the County of Santa Barbara; however, SBCAG's investment pool deposits are included in the basic financial statements of the County of Santa Barbara in an investment trust fund.

Annual audits are performed in accordance with generally accepted auditing standards as set forth by the American Institute of Certified Public Accountants; the standards for financial audits set forth in the U.S. General Accounting Office's Government Auditing Standards (1988); the provisions of the Single Audit Act; the provisions of U.S. Office of Management and Budget (OMB) Uniform Guidance codified in Title 2, Code of Federal Regulations, Subpart F, Audit Requirements; and the provisions of the Department of Transportation's Transportation Development Act - Statutes and California Code of Regulations.

XV. Other Provisions

This section describes the process by which SBCAG complies with other federal requirements such as environmental protection, Buy America provisions, pre-award and postdelivery reviews, restrictions on lobbying, prohibition of exclusive school transportation, and drug and alcohol testing, including the state's procedures for monitoring compliance by subrecipients.

As part of the established SBCAG grant award process, the SBCAG staff monitors federal compliance, such as with environmental protection regulations, Buy America provisions, ADA requirements, pre-award and post-delivery reviews, restrictions on lobbying, prohibition on exclusive school transportation and drug and alcohol testing programs, as applicable. SBCAG monitoring shall be conducted periodically on a recurring basis and include review of bid/proposal documents and agreements (if the subrecipient is using a contractor) and checklists to ensure that Federal laws and regulations are complied with.

The SBCAG certifies that, as a condition of receiving Federal financial assistance under the Urban Mass Transportation Act of 1964, as amended, it will ensure that:

- A. No person on the basis of race, color, or national origin will be subjected to discrimination in the level and quality of transportation services and transit-related benefits.
- B. The SBCAG will compile, maintain, and submit in a timely manner Title VI information required by FTA Circular 4702.1 and in compliance with the Department of Transportation's Title VI regulation, 49 CFR Part 21.9.
- C. The SBCAG will make it known to the public that those person or persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation.

Contracts Involving Federal Privacy Act Requirements – SBCAG will require subrecipients and any of their contractors to comply with applicable FTA requirements for administering any system of records on behalf of the Federal Government under any contract or agreement:

- A. The subrecipient must agree to comply with, and assure the compliance of its employees with, the information restrictions and other applicable requirements of the Privacy Act of 1974, Title 5 of the United States Code section 552a. Among other things, the subrecipient must agree to obtain the express consent of the Federal Government before the Contractor or its employees operate a system of records on behalf of the Federal Government. The subrecipient must understand that the requirements of the Privacy Act, including the civil and criminal penalties for violation

of that Act, apply to those individuals involved, and that failure to comply with the terms of the Privacy Act may result in termination of the underlying contract or agreement.

- B. The subrecipient must agree to include these requirements in each subcontract to administer any system of records on behalf of the Federal Government financed in whole or in part with Federal assistance provided by FTA.