



# **Transit State Management Plan**

## **Management of State and Federal Programs**

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# 1. Federal and State Programs Overview

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Missouri Department of Transportation (MoDOT) administers a robust funding program for public and specialized transportation using Federal Transit Administration (FTA) and State funds. The State Management Plan (SMP) describes the policies regarding administration of the following Federal Transit Administration (FTA) and State funding programs:

- [Statewide Planning and Non-Metropolitan Transportation Planning \(Section 5304\)](#) provides funding and procedural requirements for multimodal transportation planning in metropolitan and non-metropolitan areas within the state.
- [Enhanced Mobility of Seniors and Individuals with Disabilities Program \(Section 5310\)](#) provides funding to improve accessibility and mobility for seniors and individuals with disabilities.
- [Formula Grants for Rural Areas \(Section 5311\)](#) provides formula funding to states for the purpose of supporting public transportation in areas with populations of less than 50,000 people.
- [Intercity Bus Program \(Section 5311\(f\)\)](#) provides formula funding to states for the purpose of supporting intercity bus service in rural areas.
- [Rural Technical Assistance Program \(RTAP\) \(Section 5311\(b\)\(3\)\)](#) provides funding to support transportation research, technical assistance, training, and related support services in rural areas.
- [Emergency Relief Program \(Section 5324\)](#) provides authorization for Section 5311 funds to be used for disaster relief in response to a declared disaster.
- Grants for [Buses and Bus Facilities Program \(Section 5339\)](#) makes federal resources available 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. NOTE: MoDOT still administers funds awarded under the Section 5309 program requirements effective prior to the Fixing America's Surface Transportation (FAST) Act, signed into law with the December 4, 2015 reauthorization.
- [Coronavirus Aid, Relief, and Economic Security \(CARES\) Act of 2020 \(CARES Act\)](#) under Section 5311 provides supplemental federal funds to states to prevent, prepare for, and respond to COVID-19.
- [Coronavirus Response and Relief Supplemental Appropriations Act \(CRRSAA\) of 2021](#) provides supplemental federal support for states to prevent, prepare for, and respond to the impacts of COVID-19 on community public transportation services.

- [American Rescue Plan \(ARP\) Act of 2021](#) under sections 5310 and 5311 provides funding to transit systems demonstrating additional pandemic-associated needs.
- [State Transit Assistance](#) provides state financial assistance to help defray operating costs incurred by agencies providing rural and urbanized public transportation services.
- [Missouri Elderly and Handicapped Transportation Assistance Program \(MEHTAP\)](#) provides state financial assistance to help defray operating costs incurred by agencies providing transportation services to the elderly and handicapped at below cost rates if matching local or private funds are available.

FTA policy is not restated in instances where MoDOT has not adopted an additional policy. MoDOT's charter and school bus restrictions; federal provisions, such as Buy America provisions, lobbying restrictions, etc.; and National Transit Database reporting policies mirror those of the FTA. Procedures relating to administration of these programs are separately documented and are available upon request. MoDOT solicited public comment before adopting this plan.

## 2. Table of Acronyms

Acronyms	Definitions
ACV	Actual Cash Value
ADA	Americans with Disabilities Act
AI	Audit and Investigations
ARP	American Rescue Plan
BAT	Breath Alcohol Technician
BDC	Business Development and Compliance
CARES	Coronavirus Aid, Relief, and Economic Security
CDL	Commercial Driver's License
CFR	Code of Federal Regulations
CHSTP	Coordinated Human Services Transportation Plan
CMAQ	Congestion Mitigation-Air Quality
COVID-19	Coronavirus 2019
CPR	Cardiopulmonary resuscitation
CRRSAA	Coronavirus Response and Relief Supplemental Appropriations Act
CSR	Customer Service Request
DBE	Disadvantaged Business Enterprise
DOT	Department of Transportation
ECHO	Electronic Clearinghouse Operation
EEO	Employment Engagement & Outreach
FAIN	Federal Award Information Number
FAST	Fixing America's Surface Transportation
FHWA	Federal Highway Administration
FMCSA	Federal Motor Carrier Safety Administration
FMV	Fair Market Value
FTA	Federal Transit Administration
IJA	Infrastructure Investment and Jobs Act
LPA	Local Public Agency
MEHTAP	Missouri Elderly and Handicapped Transportation Assistance Program
MIS	Management Information System
MO	Missouri
MO-Kan	Missouri and Kansas Regional Planning Commission and Economic Development
MoDOT	Missouri Department of Transportation
MPO	Metropolitan Planning Organization
MRO	Medical Review Officer
NEMO	Northeast Missouri Regional Planning Commission

Acronyms	Definitions
NTD	National Transit Database
OIG	Office of Inspector General
POP	Program of Projects
RPC	Regional Planning Commission
RTAP	Rural Transportation Assistance Program
SAP	Substance Abuse Professional
SMCOG	Southwest Missouri Council of Governments
SMP	State Management Plan
STIP	Statewide Transportation Improvement Plan
STP	Surface Transportation Program
TAM	Transit Asset Management
TIP	Transportation Improvement Plan
TMA	Transportation Management Area
U.S.	United States
U.S.C.	United States Code
USDOT	United States Department of Transportation
VIN	Vehicle Identification Number

### 3. MoDOT Organizational Overview

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The Governor designated MoDOT as the agency responsible for administering the FTA transit programs. MoDOT's primary objective is to coordinate public and private non-profit transportation activities across the State with strategic goals, State statutes, and federal regulations.

MoDOT's Multimodal Division, Transit Section, administers the FTA Sections 5304, 5310, 5311, 5324, 5339, and competitive grants.

The Transit Section receives support for the administration and management of FTA programs from other MoDOT divisions and regional offices for activities associated with budgeting, contract management, accounting, purchasing, legal, contract/internal audit, vehicle specifications/inspection activities, civil rights oversight/training, and other internal departments as needed.

### 4. MoDOT's Roles and Responsibilities

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#### Applications for Programs - Subrecipients

The Program Manager (PM) updates the program application for each program available which includes but not limited to:

- agency information
- description of their transportation services
- type of funds applying for; capital, equipment, operating, etc.
- and any additional information needed

Program applications are posted on MoDOT's external Transit website. Typically, program applications are posted annually, but dependent on available funding and the need for funds this schedule may be adjusted. Unless otherwise noted, all program applications are based on a competitive selection process. All selected projects within the programs are reviewed to ensure program requirements are met. MoDOT makes every effort to notify the public of programs available and assists in assessing local needs. MoDOT presents to community groups and works with transportation "task forces" that are working to improve transportation in their community.

#### Program of Projects (POP) Development and Approval Process

Applications from all programs including rural, small-urbanized areas of the state as well as a portion of the projects from the St. Louis and Springfield urbanized areas that are being recommended for funding will be incorporated into a POP and approved by the Administrator of Transit.

Projects within the urbanized areas are included in those regions' Transportation Improvement Plans (TIPs). Rural and small urban projects are included in the Statewide Transportation Improvement Plan (STIP) at the program level.



Projects (excluding rolling stock) may take up to 24 months to complete. Capital projects including rolling stock may take up to 24 to 36 months from the application deadline for an applicant to receive its vehicle(s).

MoDOT commences issuance of subrecipient grant contract documents only upon grant award from FTA. The subrecipient grant contract is a legal agreement between the subrecipient and MoDOT. This contract spells out the amount of federal funding available to the subrecipient, defines the project for which the grant money is eligible for reimbursement, establishes the project timeline, and obligates the subrecipient to applicable federal and state requirements.

### **Applying for FTA Funding**

MoDOT Transit applies to FTA for funding using the designated FTA electronic grant management system on behalf of itself and/or eligible activities. Pre-award authority may be checked depending on the grant activities and cycle of project reimbursements.

### **Agreement Between Subrecipient and MoDOT**

Upon the final grant award from FTA, MoDOT commences issuance of subrecipient grant contract. The contract is a legal agreement between the subrecipient and MoDOT. This contract spells out the amount of federal funding available to the subrecipient, defines the project for which the grant money is eligible for reimbursement, establishes the project timeline, and obligates the subrecipient to applicable Federal and State requirements.

### **Local Share**

The matching share for capital and operating costs may be from a source that includes State, local government, unrestricted federal non-USDOT, private donations or local cash funds. Applicants eligible for public transportation assistance may utilize State funds to the applicable match. Contract revenue may be used as local match if the funds used to purchase the service are from non-USDOT federal sources. In-kind contributions may be used as local match as long as the value of such is documented and supported, represents a cost that would otherwise be eligible under the program, and is included in the net project costs in the project budget submitted in the grant application.

The local share for eligible capital projects (facilities, rolling stock and/or related capital equipment and mobility management) shall not be less than 15 percent and no more than 20 percent, unless funding requirements state otherwise. The local share for eligible operating assistance shall not be less than 50 percent. Eligible operating assistance is determined by the net operating deficit after fares and ineligible expenses are deducted from total expenses. MoDOT's subaward contract with its subrecipients will identify the required percentage of local share.

All applicants must provide proof that local match funds are from an allowable source to match federal funds and are not being obligated in another way.

## Indirect Cost/Cost Allocation Plans

Subrecipients charging indirect costs must do so at the approved rate on file with MoDOT. Subrecipients without a cognizant federal agency must submit the rate determined by an independent auditor for MoDOT approval. Subrecipients that do not have an indirect cost rate may, with MoDOT approval, adopt the de minimis rate of 10 percent.

## Private Sector Participation

Applicants are required to notify other transportation providers (especially private for-profit operators) within their service areas to ensure the proposed service will not duplicate existing service. Copies of the letters to these providers and their response must be included in each application.

Under the 5311 program, applicants must post a public notice in local newspapers of the proposed project service area, allowing a 30-day comment period from posting date. Posting must be printed and submitted to MoDOT with the application.

Local transportation organizations who contract out transportation services are allowed to use area public transportation or other private transportation networks for these services. However, a standard procurement for these services must be conducted. MoDOT has developed standard procurement procedures for soliciting proposals and executing subcontracts.

## External Partners

MoDOT works with local public/private organizations through the regional planning processes including the creation of the required Coordinated Public Transit – Human Services Transportation Plan (the Local Plan or coordinated plan).

## Project Closeout

Subrecipient awards/agreements must be completed and closed within the project timeline unless otherwise stated. If all funds have not been expended, at the discretion of MoDOT Transit's staff, an amended agreement may be executed to extend the project timeline. After project funds have been fully expended, MoDOT PM's processes a grant closeout in FTA's electronic grant management system.

# 5. FTA's Programs Administered by MoDOT - Transit

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## Section 5304 Statewide Planning and Non-Metropolitan Transportation Planning

The program's goal is to provide funding and procedural requirements for statewide multimodal transportation planning that is cooperative, continuous, and comprehensive, resulting in long-range plans and short-range programs of transportation investment priorities.

## **Eligible Subrecipients**

Includes entities responsible for developing and updating:

- The coordinated plan as part of a statewide effort
- Planning studies and coordinating efforts to improve public transportation as part of a statewide effort
- Transit studies

**Eligible Projects** include but not limited to:

- Develop transportation plans and programs
- Plan, design, and evaluate public transportation projects
- Conduct technical studies related to public transportation
  - Statewide transportation studies
  - Feasible studies
  - Other transit related activities

## **Method of Fund Distribution**

MoDOT distributes funds at its discretion upon the applications submitted and the projects proposed by subrecipients. Reimbursements approved are based upon the project and eligible expenses.

## **Coordination**

Coordination efforts include working with MPOs and RPCs to develop coordinated plans. They develop regional consensus on local transportation needs and priorities.

MoDOT participates as an active committee member on the Missouri Transportation Task Force and Master Plan on Aging to further coordinate transportation efforts at the state level.

Through its partnerships, MoDOT supports and oversees the implementation of projects to:

- Develop transportation plans and programs
- Plan, design, and evaluate public transportation projects
- Conduct technical studies related to public transportation
- Other transit related activities

For more information on MoDOT's resources allocated and made available to local areas to implement its planning efforts, please refer to the Section 5304 Statewide Planning and Non-Metropolitan Transportation Planning section of this document.

For more information on Section 5304 funding and requirements, refer to the link in Program Overview.

## **Funds Transfer**

MoDOT transfers Section 5303 Metropolitan Planning funds to the Federal Highway Administration (FHWA) for MoDOT's Planning Division to administer.

## **Section 5310 Enhanced Mobility of Seniors and Individuals with Disabilities**

The program's goal is to improve mobility for seniors and individuals with disabilities by removing barriers to transportation services and expanding the transportation mobility options available. MoDOT 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 in all areas – large urbanized, small urbanized, and rural. The program requires coordination with other federally assisted programs and services in order to make the most efficient use of federal resources.

MoDOT administers this program for rural and small urbanized areas including Cape Girardeau, Columbia, Jefferson City, Joplin, Lee's Summit, and St. Joseph. For the large-urbanized areas of St. Louis and Springfield, MoDOT shares designation and administers the traditional Section 5310 program funds. Kansas City Area Transportation Authority is the designated recipient for and administers the entire Section 5310 program in the Kansas City large-urbanized area.

### **Eligible Subrecipients**

- A private nonprofit organization
- A state or local governmental authority that:
  - Is approved by the state to coordinate services for seniors and individuals with disabilities, or
  - Certifies that there are no nonprofit organizations readily available in the area to provide the service
  - An operator of public transportation
  - Private providers of public transportation

### **Eligible Projects**

This program assists in improving the mobility for seniors and/or individuals with disabilities by removing barriers to transportation services and expanding the transportation mobility options available.

Projects may include:

- Rolling stock and related activities
- Support facilities and equipment, including technology
- Operating assistance
- Lease of equipment when lease is more cost effective than purchase
- Acquisition of transportation services under a contract, lease, or other arrangement
- Volunteer driver and aide programs
- Mobility management

### **Method of Fund Distribution**

MoDOT sets aside a minimum of 55 percent of its annual apportionment to fund "traditional" (capital) projects and 35 percent to fund "non-traditional" transportation

projects. The remaining 10 percent is allocated to state administration. In selecting the projects for funding, consideration is given to geographic distribution to deter concentration of projects.

### **Public Health Emergency Funding**

In response to the [COVID-19 public health emergency](#), FTA provided additional funding and flexibilities under the Section 5310 program to assist transit agencies in recovering from the unprecedented negative financial impact. This section outlines the funding and accompanying requirements that impact the MoDOT Section 5310 program funds distributed to subrecipients for this purpose.

- **Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA) of 2021** – New Section 5310 funding apportioned under CRRSAA must be used, to the maximum extent possible, for payroll and operations of public transit, unless the subrecipient certifies to MoDOT that it has not furloughed any employees during the public health emergency. All FTA Section 5310 program requirements/procedures apply unless otherwise noted below or as modified, amended or otherwise changed by FTA.

MoDOT awards CRRSAA funds for operating expenses, including administrative leave for transit workers, as long as those expenses were incurred after January 20, 2020.

Any Section 5310 formula funds that MoDOT had not obligated in an award as of December 27, 2020, is obligated at 100 percent federal funding. These awards will comply with all Section 5310 program requirements, including the 55 percent minimum expenditure for “traditional” capital projects, and inclusion of projects in the coordinated plan.

- **American Rescue Plan (ARP) Act of 2021** – New Section 5310 funding apportioned under ARP must be used, to the maximum extent possible, for payroll and operations of public transit, unless the subrecipient certifies to MoDOT that it has not furloughed any employees during the public health emergency. Like the CRRSAA funding, all FTA Section 5310 program requirements/procedures apply unless otherwise noted below or as modified, amended or otherwise changed by FTA.

MoDOT awards ARP funds to rural and small urban Section 5310 subrecipients and administers the Springfield large-urbanized area, for operating expenses, including administrative leave for transit workers, as long as those expenses were incurred after January 20, 2020.

- **CRRSAA Act and ARP Act Match and Availability** – The federal share for eligible expenses is 100 percent of the net operating deficit and/or of the capital

expenditure. Funding must be obligated by September 30, 2024, and disbursed by September 30, 2029.

### **Locally Developed Coordinated Plan**

To be considered for funding, the proposed projects must be included in the locally developed coordinated plan. In urbanized areas (over 50,000 in population), the metropolitan planning organization (MPO) develops the locally developed coordinated plan. In all other areas of the State, regional planning commissions (RPCs) develop the locally developed coordinated plan. Efforts include but not limited to surveys, phone contacts, emails, etc.

Members of the public, including seniors, individuals with disabilities, representatives of public, private, not-for-profit transportation and human service providers must participate in the development and approval of the locally developed coordinated plan.

Applicants are required to commit to coordinate transportation services as outlined in the locally developed coordinated plan covering their area of existing/proposed service. A listing of urbanized and non-urbanized area coordinated plans can be found in

### **APPENDIX A.**

### **Program Measures**

The program measures for Section 5310 traditional projects are:

- **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 trips) provided annually 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.

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

## **Funds Transfer**

MoDOT allows [Surface Transportation Program \(STP\)](#) and [Congestion Mitigation-Air Quality \(CMAQ\)](#) fund transfers to the Section 5310 Program.

For more information on Section 5310 funding and requirements, refer to the link in Program Overview.

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## **Section 5311 Formula Grants for Rural Areas**

The program's goal is to enhance access to health care, shopping, education, employment, public services, and recreation, and serves to foster economic growth for people in rural areas by:

- Assisting in the maintenance, development, improvement, and use of public transportation systems in rural areas.
- Encouraging and facilitating the coordination of programs and services to ensure the most efficient use of funds.
- Providing for the participation of private transportation providers in rural transportation to the maximum extent feasible.

## **Eligible Subrecipients**

May include:

- A State or local governmental authority
- A private nonprofit organization
- A federally recognized Indian tribe
- Private provider of public transportation

## **Eligible Projects**

- Operating: expenses directly related to system operation, including administration
- Capital: expenses directly related to vehicle acquisitions/replacements and/or for the construction and rehabilitation of facilities, purchase of capital equipment, such as fare collection and communication systems, computer equipment, shelters, and signs, etc.

## **Eligible Services and Service Area**

MoDOT provides funding for public transit in rural areas of the State. The eligible service area includes service beginning and/or ending in nonurbanized (rural) areas of the state. Transportation services must always be available to the general public on a regular and continuing basis and have publicly advertised and posted service hours.

## **Method of Distributing Funds**

MoDOT administers a competitive application process. To accomplish MoDOT's goals for the Section 5311 program, MoDOT allocates federal funds (minus any reserves for administration) as follows.

- Fifteen percent of the funds are reserved to support intercity bus service.



- Up to ten percent will be held in reserve to be allocated at the discretion of the department for program and project administration.
- Remaining funds will be allocated to rural public transportation providers based on operating or capital request.

MoDOT gives priority for distributing Section 5311 funds to operating projects. If funds remain, MoDOT will utilize funds for capital projects. Applications and grants under Section 5311 are based on the State fiscal year and awards are made for one year, at minimum. This procedure of structuring around fiscal periods minimizes auditing challenges for the subrecipient and MoDOT. New applicants will receive funding based on the transportation plan developed for the new service.

The U.S. Census boundaries are used to determine the eligible rural areas. Applicants for Section 5311 assistance that are direct Section 5307 recipients are required to document which rural services and expenses are eligible for funding based on a method which may include the percentage of the total service, passengers, or miles. MoDOT reviews and approves the methodology used by subrecipients to determine eligibility.

### **Transit Asset Management (TAM)**

5311 subrecipient who own, operate, or manage less than 100 vehicles across all fixed route modes, or less than 100 vehicles in one non-fixed route mode must be included in either their own TAM plan or a Group TAM Plan. See Section 8 for additional information.

### **Public Health Emergency Funding**

In response to the [COVID-19 public health emergency](#), FTA provided additional funding and flexibilities under the Section 5311 program to assist transit providers in recovering from the unprecedented negative financial impact. This section outlines the funding and accompanying requirements that impact the MoDOT Section 5311 program funds distributed to subrecipients for this purpose.

- **Coronavirus Aid, Relief, and Economic Security (CARES) Act of 2020** – Under the CARES Act,
- FTA program requirements/procedures apply unless otherwise noted below, or as modified, amended or otherwise changed by FTA. Funding provided under this Act supplements the core Section 5311 program funding to reimburse COVID-19 related expenses incurred after January 20, 2020.
- **CRRSAA of 2021** – funding apportioned under CRRSAA must be used, to the maximum extent possible, for payroll and operations of public transit, unless the subrecipient certifies to MoDOT that it has not furloughed any employees during the public health emergency. Like the CARES Act funding, all FTA Section 5311 program requirements/procedures apply unless otherwise noted below or as modified, amended or otherwise changed by FTA.
- **ARP Act of 2021** – funding apportioned under ARP must be used, to the maximum extent possible, for payroll and operations of public transit, unless the



subrecipient certifies to MoDOT that it has not furloughed any employees during the public health emergency. Like the CARES Act and CRRSAA funding, all FTA Section 5311 program requirements/procedures apply unless otherwise noted below or as modified, amended or otherwise changed by FTA.

ARP also incorporates funds carved out for the Intercity Bus program.

- **CARES Act, CRRSAA, and ARP Act Match and Availability** – The federal share for eligible expenses is 100 percent of the net operating deficit and/or of the capital expenditure. Funding must be obligated by September 30, 2024, and disbursed by September 30, 2029.

### Transfer of Funds

MoDOT allows Surface Transportation Program (STP) and Congestion Mitigation-Air Quality (CMAQ) fund transfers to the Section 5311 Program.

### Intercity Bus Transportation

MoDOT will allocate up to 15 percent of the annual Section 5311 apportionment to support intercity bus services for capital and operating projects. Private for-profit companies, not-for-profits, and public entities providing intercity bus service are eligible subrecipients.

Intercity bus providers are required to submit a preliminary application, as the funding for these subrecipients may vary widely dependent upon if they are requesting capital funding. This requirement enables MoDOT to shift unused Section 5311(f) funds to general public providers if it is available.

If applications are received for more than the funds available, operating grants will be awarded on a competitive basis using the following criteria:

- Percentage of fare recovery
- Cost per revenue mile
- Ridership per revenue mile
- Ratio of rural bus stops to miles per route
- Intercity bus study

If eligible applicants do not express an interest in supporting intercity bus service or if the requests received are less than the reserved amount, after the completion of the State consultation process within 30 days of notification of availability, the Governor will be requested to execute a certification that all intercity bus needs are being met.

To simplify the auditing process and to ensure that for-profit companies' proprietary information is not disclosed, eligible operating expenses are limited to the following:

- Marketing/advertising for new and/or expanded service
- Operating expenses including fuel, tires, supplies, and drivers' wages and benefits
- Licensing
- Insurance
- Repairs

No administrative expenses are allowable in order to protect proprietary information. Depreciation and maintenance/upkeep of offices and facilities are also unallowable expenses.

The amount of subsidy will be limited to no more than one half of the net operating expense (total eligible expense reduced by total fares). The intercity bus provider may provide the match through other company revenues or may solicit matching funds from cities and entities that may be interested in maintaining intercity bus service in their area.

Intercity bus providers must abide by the same rules and regulations as other Section 5311 providers including procurement and auditing requirements.

The Program Manager, or a designated representative, will inventory all equipment purchased with federal funds annually. Intercity bus operators must make the equipment readily available for inspection at MoDOT's request. In addition, the program manager, or designated representative, will perform field audits to review maintenance records for federally funded vehicles, ensure compliance with Americans with Disabilities Act (ADA), and oversee drug and alcohol testing requirements. All intercity bus drivers must hold a commercial driver's license (CDL) and comply with Federal Motor Carrier Safety Administration (FMCSA) drug and alcohol testing requirements. However, when driving FTA-funded vehicles the driver becomes subject to the FTA testing requirements which differ slightly from FMCSA.

Intercity bus transportation is eligible for CARES Act and ARP Act funds. All requirements for the FTA Section 5311(f) program apply unless otherwise noted, modified, amended, or changed by FTA.

For more information on Section 5311 funding and requirements, refer to the link in Program Overview.

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## **Section 5339 Bus and Bus Facilities Formula Program**

The program's goal is to provide capital assistance for buses and bus facilities to support the continuation and expansion of public transportation services in rural and small urbanized areas. MoDOT allocates the statewide and small urbanized area funds and administers the funds allocated to rural transportation provider.

### **Project Selection Criteria and Method of Distributing Fund**

MoDOT allocates assistance using a formula agreed to by the State's transit providers. Each transportation management area (TMA) receives \$50,000 from the statewide distribution. MoDOT combines the remaining statewide distribution and small urban funds and divides the pot in half with one half allocated to support the Section 5311 program and the other half allocated to the small-urbanized areas. The small-urbanized area portion is distributed by formula to each small-urbanized area based on population per the 2020 Census released by the United States Census Bureau.

### **Eligible Subrecipients**

- Fixed route bus operators
- States or local governments entities that operate fixed route bus services
- Indian tribes
- Non-profit organizations engaged in public transportation

### **Eligible Projects**

- Capital projects – replace, rehabilitate rolling stock and related equipment
- To construct, rehabilitate bus related facilities, etc.
- Miscellaneous equipment: mobile radio equipment, fare boxes, computers, shop and or garage equipment, etc.

### **Transfer of Funds**

Funds apportioned to urban recipients are transferred to FTA to administer.

For more information on Section 5339 funding and requirements, refer to the link in Program Overview.

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## **Rural Transportation Assistance Program (RTAP)**

The goal of this program is to provide instruction designed to fulfill the training needs of subrecipients of Section 5311 funded projects. MoDOT conducts a competitive procurement for a third-party to deliver RTAP services. Specialized assistance in accounting, auditing, appraising, vehicle procurement and maintenance, and legal matters may also be provided, either by MoDOT or attendance at classes and/or conferences.

Funding is provided for off-site training in cardiopulmonary resuscitation (CPR), first aid, and computer courses at no cost to Section 5311 subrecipients. Funding is available for the costs of in-state training sessions (such as the Missouri Public Transportation Association annual meeting). If sufficient RTAP funds are available, out-of-state travel and training may be approved on a case-by-case basis upon submission of an application to the Section 5311 Program Manager.

MoDOT does not require match for RTAP funding.

For more information on RTAP funding and requirements, refer to the link in Program Overview.

## **6. Real Property**

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Real Property, which includes land, affixed land improvements, structures, and appurtenances, must be used for the designated program. MoDOT maintains control over real property and related equipment through a tracking system, annual certification, disposition, and insurance requirements.

## Inventory

MoDOT maintains a comprehensive, permanent listing of all federally funded facilities identifying elements such as (1) description, (2) parcel number, (3) location, (4) cost, (5) acquisition date, and (5) ownership, among others.

MoDOT reviews the status of federally funded facilities with subrecipients. Elements reviewed include use and condition, improvements, expansions or retrofits, date placed in service, insurance coverage, disposition actions, or revenue earned from any incidental use.

## Facility Use Certification

Subrecipients are required to submit a signed certification stating the real property is used for the purpose intended. The subrecipient must certify that the facility or portions are not idle, sold or otherwise taken out of service, and that MoDOT's and the federal interest or the title has not been compromised. The certification also requires that subrecipients certify to adequate insurance coverage to cover the federal interest, as outlined in the executed grant agreement between subrecipients and MoDOT.

During this process, MoDOT will confirm that subrecipients maintain sufficient flood insurance by reviewing the Federal Emergency Management Agency (FEMA) flood maps and also seek certification and verification from subrecipients, as applicable. Program Managers and/or subrecipients are responsible for annually reviewing the Federal Emergency Management Agency flood maps to confirm their location and take the necessary steps to ensure the MoDOT-funded assets are protected. The link to the Federal Emergency Management Agency flood maps is <https://msc.fema.gov/portal/home>.

If determined that a facility is located within a FEMA flood zone, subrecipients must obtain flood insurance as required by the [Flood Disaster Protection Act of 1973, 42 U.S.C. § 4012a\(a\)](#), for any building located in a special flood hazard area (100-year flood zone). The building and its contents must be covered in an amount at least equal to the federal and state investment (less estimated land cost) or equal to the maximum limit of coverage made available with respect to the particular type of property under the [National Flood Insurance Act of 1968](#). Current limits are \$500,000 per building and \$500,000 for the contents of each building.

## Records

All subrecipients are required to maintain records for all federally funded real property. These records must include, at a minimum, the following information:

- Property location/physical address
- Use and condition of the property
- Summary of conditions on the title
- Brief description of improvements, expansions, and retrofits
- Corresponding useful life
- Date placed in service
- Original acquisition cost
- Sources of funding
- Federal and non-Federal participation ratios

- Federal Award Information Number (FAIN) – provided in MoDOT subrecipient contract
- Appraised value and date
- Anticipated disposition or action proposed, if applicable
- Date of disposal, if applicable
- Sale price, if applicable
- Reason for excess property, if applicable

## Incidental Use

Subrecipients seeking to make incidental use of federally funded real property must first seek and obtain MoDOT's approval. Incidental uses must be compatible with the approved purposes of the original award and not interfere with either the intended uses of the property or the subrecipient's ability to maintain satisfactory continuing control. Subrecipients must reinvest any income generated from the incidental use back into the transit program. The file should also include the capital agreement and a copy of the original purchase order.

## Maintenance

All subrecipients of federally funded facilities must develop and submit a facility maintenance plan to MoDOT for review and approval.

For the long-term operational success and viability of a facility, asset management requires early attention and development, prior to transitioning from construction to operations. Prior to facility acceptance, subrecipients must validate that the building systems and equipment are operating as designed. Subrecipients are to ensure that its staff are sufficiently trained and obtain the necessary skills to operate the facility during the transition.

Prior to final acceptance, subrecipients are expected to either work with the construction team to obtain or develop a comprehensive maintenance plan that addresses the ongoing management of the various elements of the facility, including machines, equipment, building systems, and structural parts. The maintenance plan should address the preventive maintenance program (routine checking of the facility and equipment contained therein), inventory management, work order activities, and a predictive maintenance program to ensure all assets are kept in working order and to reduce the risk of unexpected breakages or failures. It should also address who is responsible for performing each maintenance responsibility.

Maintenance plan templates are available to subrecipients upon request.

## Useful Life

MoDOT has established minimum useful life standards for its federally funded real property that align with the TAM Plan of 40 years. These standards are established in accordance with FTA guidelines, and reflect a combination of industry standards, MoDOT experience, and research with other state DOTs. MoDOT's interest in real property does not end until disposition.

## Disposition

Subrecipients are required to notify MoDOT and obtain instructions on how to dispose of federally funded real property in accordance with the Uniform Relocation Assistance and Real Property Acquisition Act and MoDOT's LPA guidelines for disposal of property (<https://www.modot.org/local-public-agency>). MoDOT will provide final approval of real property disposition after verifying that the disposition records demonstrate compliance with federal, state, and local requirements.

## 7. Equipment and Vehicles

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### Inventory

All subrecipients must submit an inventory listing of all vehicles and equipment purchased.

### Certification and Vehicle Use

Federally funded vehicles and equipment must be used for the designated program. MoDOT maintains a comprehensive inventory system of all federally funded vehicles and equipment, identifying elements such as (1) description, (2) serial/vehicle identification number (VIN), (3) date of purchase/cost, (4) mileage, and (5) condition, among others.

Subrecipients are required to submit a signed certification stating the vehicle and/or equipment is being used for the purpose intended. The subrecipient must certify that the vehicle has not been damaged, sold or otherwise taken out of service, and that MoDOT's and the federal interest or the title has not been compromised. The certification also requires that the subrecipient has adequate insurance coverage that meets Missouri's minimum requirements and to cover the federal interest.

### Records

All subrecipients are required to maintain a vehicle/equipment file containing inventory records that include, at a minimum, the following information:

- Description
- Acquisition date
- Federal participation percentage
- Condition (use MoDOT [Transit Asset Management](#) (TAM) condition rating scale)
- Serial/vehicle identification number
- Title (vehicle only)
- Location
- FTA grant number
- Unit purchase cost
- Disposition
  - Method
  - Selling price
  - Date of sale

Equipment files must be on items with an original unit cost of \$5,000 or more and have a useful life of one year or more.

The file should also include the capital agreement and a copy of the original purchase order.

### **Transfer of Equipment**

Subrecipients may transfer capital equipment no longer needed to another subrecipient within the same program upon MoDOT's approval. MoDOT remains as first lien holder to retain the federal interest.

### **Incidental Use**

Subrecipients seeking to make incidental use of federally funded vehicles and equipment must first seek and obtain MoDOT's approval. 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 the transit program.

### **Titles**

MoDOT will retain possession of all titles, with MoDOT listed as first lien holder. No second liens may be placed on any federally funded vehicle. A subrecipient, utilizing federally funded vehicle(s) or equipment that, has not met its useful life, and who discontinues their project, will be required to either transfer the property to another subrecipient within the same program or reimburse MoDOT for the federal share of the fair market or depreciated value, whichever is greater.

### **Maintenance**

Subrecipients must keep federally funded vehicles and equipment in good operating order. At a minimum, vehicles will be maintained in accordance with the manufacturer's suggested preventive maintenance schedule. A maintenance plan is recommended for all vehicles and/or equipment purchased using federal funds.

Records must be kept in accordance with the terms of the subrecipient agreement. The records should include both routine (preventive) and corrective maintenance.

All accessible vehicles covered by ADA requirements must be maintained in such a manner that ensures all lifts, securement devices, ramps, signage, and systems that allow communications with hearing and vision impaired individuals are readily accessible to and usable by these individuals. Out of order equipment must be repaired promptly. When an accessibility feature is out of order, the subrecipient shall take reasonable steps to accommodate individuals with disabilities who would otherwise use the feature.

### **Warranty Program**

MoDOT requires that subrecipients have a system for tracking warranty issues and recovering warranty claims. Subrecipients are responsible for:



- Establishing and maintaining a system for recovering warranty claims. This system should provide information needed by the subrecipient on the extent and provisions of coverage and on claims processing procedures.
- Identifying and diligently enforcing the system for recovering warranty claims.

During its compliance reviews, MoDOT will confirm that subrecipients have developed and implemented a warranty program for MoDOT federally funded assets under warranty. In addition, MoDOT will review a sample of warranty claims submitted.

### Useful Life

MoDOT has established minimum useful life standards for its federally funded assets in accordance with FTA guidelines. The minimum useful life standards for all capital purchases are noted below.

### Rolling stock

Vehicles will be eligible to be considered for replacement or disposal when the minimum useful life has been met. MoDOT defines useful life for each vehicle type as follows:

Rolling Stock (all programs)	Useful Life
Vans – straight, modified, sedans, lowered floor and other vehicles-minivans	4 years or 100,000 miles
25’ – 35’ Light duty transit buses, cutaways (bodies on chassis)	5 years or 150,000 miles
30’ Medium duty transit bus	7 years or 200,000 miles
30’ Heavy duty transit bus	10 years or 350,000 miles
35’ – 40’ Heavy duty bus and transit buses	12 years or 500,000 miles
Ferry Boats	25 years

### Equipment

Equipment will be eligible to be considered for replacement or disposal when the minimum useful life has been met as stated above.

Sample Equipment (all programs)	Useful Life
Light duty vehicles (support, non-rolling stock)	5 years or 150,000 miles
Shop equipment (vehicle lifts, bus washing, tire changers, etc.)	10 years



<b>Sample Equipment (all programs)</b>	<b>Useful Life</b>
Fare boxes (Used in revenue vehicles)	10 years
Surveillance equipment (Vehicle or facility cameras, etc.)	5 years
Communications equipment (Mobile radios, base stations)	5 years
ITS (Computers, software, mobile tablets, other office equipment)	5 years

## Disposition and Proceeds

Subrecipients are required to submit a written request for disposal of federally funded assets. The subrecipient must receive written authorization from MoDOT before disposing of federally funded equipment, including vehicles. The subrecipient has 90 days to process and close the disposition request from the date of the approved authorization. All dispositions are reviewed on a case-by-case basis.

- If a vehicle is sold outright to a third party (advertised bids, auto auction, etc.), and is sold for \$10,000 (gross sale) or less, the recipient may retain the full proceeds from the disposition, documentation from the sale of the vehicle must be submitted to MoDOT for clarification of the sale price within 15 days of the sale.
- If the sale (gross amount) is greater than \$10,000, the recipient may retain \$5,000 plus the local share (normally 20%). The balance must be paid to MoDOT – Transit within 15 days after the sale of the vehicle.
- If a recipient chooses the buyback option, depending on the Fair Market Value (FMV), the division of proceeds will be determined in #1 or #2 above.
- Insurance proceeds: If the recipient receives insurance proceeds when federally assisted property has been lost or damaged by fire, casualty, or natural disaster, the federal interest due to MoDOT is based on the Actual Cash Value (ACV) or Fair Market Value (FMV) with 80 percent of the ACV/FMV due to MoDOT. The ACV or FMV is assessed by the insurance company, or it may be determined by MoDOT Transit staff.

## 8. Transit Asset Management (TAM) Plan

Transit asset management (TAM) is a business model that prioritizes funding based on the condition of transit assets to achieve and maintain a state of good repair (SGR) for the nation’s public transportation assets. This develops a framework for transit agencies to monitor and manage public transportation assets, improve safety, increase reliability and performance, and establish performance measures in order to help agencies keep their systems operating smoothly and efficiently.

The TAM final rule groups providers into two classifications:

1. **Tier I:** Providers own, operate, or manage rail, more than 101 vehicles across all fixed-route modes, or more than 101 vehicles in one non-fixed route mode.
2. **Tier II:** Providers are subrecipients of 5311 funds, or an American Indian Tribe, or own, operate, or manage less than 100 vehicles across all fixed route modes, or less than 100 vehicles in one non-fixed route mode.

#### TAM Major Components

- Asset Inventory
- Condition Assessment
- Decision Support Tools
- Investment Prioritization

For more information refer to [MoDOT's Sponsored Group TAM Plan](#).

## 9. Technical Assistance

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MoDOT offers technical assistance to its subrecipients through RTAP and direct contact and guidance from Program Managers. MoDOT also provides policy/procedural templates and guidance in developing program requirement plans, conducts trainings, holds annual compliance workshops, participates in monthly program/project calls, and attends transit related state-wide meetings and conferences.

Program Managers respond to requests for assistance from individual subrecipients by phone and email. Areas of technical assistance include, but are not limited to:

- Providing direction and input to plans for new or expanded transit service
- Reviewing and analyzing transit operations
- Providing assistance in understanding and carrying out requirements of federal and state regulations
- Reviewing and approving third party procurements
- Providing guidance and assistance to coordinate transit services
- Providing advice and support in the preparation of the annual applications for non-competitive grant programs

As part of our third-party contract support, our consultant provides subrecipient support on bringing their program into compliance as part of the oversight reviews and in capital project implementation.

## Oversight

MoDOT currently contracts with an external consultant which monitors subrecipient compliance by analysis of subrecipient reporting, responses to compliance events and complaints as well as observations through phone conversations, e-mails, in-person meetings, and onsite inspection visits. Oversight is accomplished through the following activities:

- Review of:
  - Grant applications
  - Annual single audit reports if agency meets reporting threshold
  - Quarterly or monthly grant reimbursement requests and associated supporting material
  - Site visit audit reports from MoDOT's substance abuse program contractor
- Submission of:
  - Annual grant funded vehicle, equipment, and real property usage report
  - Annual NTD reports (Section 5311)
  - Annual drug and alcohol program Management Information System (MIS) reports
  - Semi-annual DBE reports
  - Annual or four-year update of EEO plans
  - Three-year update of Title VI programs
- Conduct compliance and performance reviews
- Receipt of civil rights complaints
- Notification of legal matters

For more information refer to [Subrecipient Compliance Oversight Standard Operating Procedures](#).

## 10. Other Regulations and Guidance Areas

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### ADA

MoDOT ensures compliance with all civil rights programs, including Section 504 of the federal Rehabilitation Act and ADA, through technical assistance and oversight reviews. Under USDOT regulations concerning administration of the ADA, all subrecipients must comply with 49 CFR Parts 27, 37, and 38 implementing the ADA and amending the Section 504 rule. ADA provisions require public and private transportation providers to operate services in a way that does not discriminate against persons with disabilities. The regulations include general nondiscrimination provisions that apply to all types of agencies and services. This civil rights law sets forth specific requirements for public transportation services, vehicle and facility accessibility, and the provision of complementary paratransit service, as well as overall requirements for a complaint process.

MoDOT subrecipients must develop and publicize its procedures for addressing ADA complaints that incorporate due process standards and provides for prompt equitable

resolution. Subrecipients must advertise the process for filing ADA-related complaints through means such as the websites and communicate a response promptly to complainants. Subrecipients must also designate an employee to coordinate the ADA complaint process and advertise their name, phone number, physical and email address on the website. Copies of complaints must be retained for one year. A summary of complaints must be kept for five years.

If purchasing non-accessible vehicles with FTA funds, MoDOT requires subrecipients to provide equivalent service.

## Civil Rights

MoDOT's Business Development and Compliance (BDC) and the Employment Engagement & Outreach (EEO) Division share primary responsibility for administering the USDOT ADA, Disadvantaged Business Enterprise (DBE), Title VI, and EEO programs.

BDC responsibilities include, but are not limited to:

- Developing the MoDOT Title VI Plan
- Tracking discrimination complaints
- Ensuring compliance with MoDOT's USDOT DBE program
- Reviewing and approving subrecipient Title VI programs

EEO Division is responsible for reviewing and approving subrecipient EEO programs.

The Transit Section works closely with BDC and the EEO Division to develop and monitor all Civil Rights programs. The Transit Section also shares the responsibility for providing technical assistance and supporting subrecipients in implementing Civil Rights requirements into their transit operations.

## DBE

Subrecipients are required to comply with BDC's DBE program developed in accordance with [49 CFR Part 26](#). In setting its triennial goal, the BDC reviews whether there will be any contracting opportunities with the funds awarded to subrecipients. As part of grant award, BDC works with the Transit Section to determine if it will require a subrecipient to establish and meet DBE goals with those funds. BDC will work with subrecipients to implement this process in areas such as outreach, monitoring, and enforcement. Subrecipients can access BDC's website for a listing of approved DBE Firms and additional DBE information, [DBE Program | Missouri Department of Transportation](#).

## 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](#). Subrecipients update their program every three years and submit it to MoDOT for review and approval. Implementation of the Title VI Program is verified as part of MoDOT compliance reviews.

## 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 year. Subrecipients update their program at a minimum every year, as required by MoDOT, and submit it to MoDOT for review and approval. Implementation of the EEO Program is verified as part of MoDOT compliance reviews.

## Rural National Transit Database (NTD)

The NTD is the FTA's primary national database for collecting and maintaining statistics on the transit industry. Recipients of Sections 5311 assistance are required by [49 U.S.C. 5335](#) (a) and (b) to submit data to the NTD as a condition of grant award.

## MoDOT Procurement

MoDOT's procurement of equipment, services, vehicles, etc., follows [Missouri State Statute \(7 CSR 10-11\)](#) and federal ([OMB 2 CFR Part 200](#) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards and FTA's Third-Party Contracting Guidance – [Circular 4220.1F](#)) regulations to ensure compliance.

## Subrecipient Procurement

All subrecipients must develop written procurement policies and procedures that comply with 2 CFR 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards and Missouri State Statute 7 CSR 10-11. MoDOT Transit staff review subrecipients' procurement policies and procedures for compliance.

Subrecipients may directly purchase goods and services. Purchases must be made in a competitive manner following federal and state procurement requirements. MoDOT oversees the process providing approvals along the way and at performance reviews.

For procurement of real property (land and facilities) subrecipients must work with MoDOT to ensure compliance with [National Environmental Policy Act](#), [Uniform Relocation Assistance and Real Property Acquisition Act](#), and MoDOT's Local Public Agency (LPA) guidelines for land acquisition (<https://www.modot.org/local-public-agency>). A feasibility study must be completed for all facility projects. All new construction or rehabilitation of an existing structure will meet requirements for local land use planning and zoning, relocation, traffic and parking, energy conservation, and consideration of historic properties, and will place an emphasis on safety and security. A portion of Missouri lies in the New Madrid fault zone and all facilities must be constructed and/or rehabilitated to meet current seismic and ADA accessibility requirements.

## Construction Management

Construction management is the responsibility of the subrecipient. Subrecipients must follow MoDOT's LPA (<https://www.modot.org/local-public-agency>) guidelines for construction projects. MoDOT participates in the project by (1) assisting in the development, review, and approval of the subrecipient's grant application; (2) reviewing requests for proposals, invitations for bid, and the resulting contract vehicle between the subrecipient and its consultant; (3) participating in project progress meetings; (4)

receiving progress meeting minutes and reports; (5) reviewing progress invoices and monitoring conducted; and, (6) participating in final inspection activities.

Subrecipients are responsible for environmental analysis activities. As such, subrecipients must assist MoDOT in addressing environmental requirements in the FTA grant application. MoDOT reviews public involvement processes conducted by subrecipients for each project.

Facility construction projects involve separate competitive processes for design and construction. MoDOT's headquarters and regional engineering staff review plans, specifications and estimates, and the progress of construction. Capital purchases during the project and construction of facilities are conducted by subrecipients with the concurrence of MoDOT. Leasing of capital assets is allowed if it can be demonstrated that it is more cost effective than purchase or construction.

MoDOT's regional offices provide technical assistance and oversight as necessary or upon request.

## 11. Financial

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### State Procedures

MoDOT utilizes the State of Missouri electronic financial management system to maintain records of funds and funding. This financial management system incorporates such functions as budgeting, general ledger, purchasing, accounts payable/receivable, inventory control, cost allocation, and job costing.

MoDOT maintains a system of accounting and internal controls to assure accurate and timely cash flow to local projects. Funds are obligated and disbursed following procedures that include appropriations, allocations, obligation, requests for payment with documentation, and a well-established system of vouchers and payment procedures.

Uniform reporting is required for all projects, with a separate project code established for each award. MoDOT regularly reconciles records by a comparison of expenditures made between the State's accounting system and MoDOT accounting records, to assure that all invoices and reimbursement requests are correctly processed. MoDOT uses the State's system of record to compile the Electronic Clearinghouse Operation (ECHO) billing submitted by its subrecipients.

Each subrecipient is responsible for accurate and complete disclosure of its expenditures and revenues. Reimbursement of eligible expenses is made within 30 days of receipt of satisfactory documentation.

Projects receive reimbursement for no more than the amount of the award total specified in the contract.

## Audits

Subrecipients must submit a report prepared by an independent auditor in accordance with the [2 CFR Part 200 Subpart F Audit Requirements](#). MoDOT's Audit and Investigations (AI) Division reviews and follow-up on federal findings as part of a separate monthly process.

## 12. Other FTA Requirements

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### Legal

Subrecipients must promptly notify MoDOT of legal matters. MoDOT will notify FTA of any instances relating to fraud or false claims under the False Claims Act reported by its subrecipients. Subrecipients must also comply with restrictions on lobbying requirements.

### Charter Service

All subrecipients who are considering charter service are responsible for complying with the requirements of [49 CFR Part 604](#). Prior to providing charter service, subrecipients must obtain pre-approval from MoDOT.

### Drug and Alcohol Program

Subrecipients of Section 5310 funds with vehicles that require a CDL must comply with the requirements of [49 CFR Part 382](#) "Controlled Substances and Alcohol Use and Testing."

Subrecipients of Sections 5311 and 5339 funds are required to comply with the requirements of [49 CFR Part 655](#) "Prevention of Alcohol Misuse and Prohibited Drug Use in Transit Operations."

All subrecipients are required to comply with the requirements of [49 CFR Part 40](#) "Procedures for Transportation Workplace Drug and Alcohol Testing Programs."

In addition to meeting the requirements of the CFRs, MoDOT also requires its subrecipients to:

- Attend ongoing training
- Submit annual MIS reports
- Utilize the FTA Drug and Alcohol Policy builder (Sections 5311 and 5339 only)
- Maintain a current file of service agents' (substance abuse professional (SAP), breath alcohol technician (BAT), medical review officer (MRO), collectors) certificates
- Utilize MoDOT's contracted Third Party Administrator to support their Drug and Alcohol program, through managing random selections/consortiums, locating collection sites, providing oversight on testing of urine specimens at the lab, and reviewing/reporting on drug screen results, and providing MRO/SAP services
- Undergo Drug and Alcohol Program Manager interview during compliance reviews

- Conduct ongoing mock reviews of collection sites
- Register with the USDOT's Federal Drug and Alcohol Clearinghouse (recommended)
- Complete the FTA random testing chart, if applicable (recommended).



## APPENDIX A

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### Links to Urbanized Areas Coordination Plan Information:

**Cape Girardeau-Southeast Missouri Metropolitan Planning Organization** (*Counties of Cape Girardeau and Scott*)

<https://southeastmpo.org/planning-documents/>

**Columbia Area Transportation Study Organization** (County of Boone)

[Public Transit Human Services Plan - City of Columbia Missouri](#)

**East-West Gateway Council of Governments** (*Counties of Franklin, Jefferson, St. Charles & St. Louis*)

[Coordinated Human Services / Section 5310 – East-West Gateway Council of Governments \(EWGCOG\)](#)

**Jefferson City-Capital Area Metropolitan Planning Organization**

[https://www.jeffersoncitymo.gov/government/long\\_range\\_transportation\\_plan/plans\\_and\\_publications.php](https://www.jeffersoncitymo.gov/government/long_range_transportation_plan/plans_and_publications.php)

**Joplin Area Transportation Study Organization** (*Counties of Jasper and Newton*)

[Public Transit Human Services Transportation Coordination Plan | Joplin, MO - Official Website](#)

**Mid-America Regional Council** (*Counties of Cass, Clay, Jackson, Platte & Ray*)

[Coordinated Public Transit Human Services Transportation Plan | MARC](#)

**Ozarks Transportation Organization** (*Counties of Green and Christian*)

[Plans, Reports, and Studies | OTO](#)

**St. Joseph Area Transportation Study Organization** (*County of Buchanan*)

<https://www.stjosephmo.gov/DocumentCenter/View/20064/2050-MTP->

### Links to Non-Urbanized Areas Coordination Plan Information:

**Boonslick RPC Coordination Plan** (*Counties of Lincoln, Montgomery and Warren*)

[Transportation - Boonslick Regional Planning Commission](#)

**Bootheel RPC & EDC** (*Counties of Dunklin, Mississippi, New Madrid, Pemiscot, Scott & Stoddard*)

<https://bootrpc.com/transportation-advisory-committee-tac>

**Green Hills RPC** (*Counties of Caldwell, Carroll, Chariton, Daviess, Grundy, Harrison, Linn, Livingston, Mercer, Putnam & Sullivan*)

<https://ghrpc.org/about-us/ghrpc/programs/transportation-planning/>

**Harry S. Truman Coordinating Council** – (*Counties of Barton, Jasper, Newton & McDonald*)

[Transportation Plans | HSTCC](#)

**Kaysinger Basin RPC** (*Counties of Bates, Benton, Cedar, Henry, Hickory, St. Clair & Vernon*)

[Transportation - Kaysinger Basin Regional Planning Commission](#)

**Lake of the Ozarks Council of Local Governments** (*Counties of Camden, Laclede, Miller & Morgan*)

[Publications - Lake of the Ozarks Council of Local Governments](#)

**Mark Twain Regional Council of Governments** (*Counties of Audrain, Macon, Marion, Monroe, Pike, Ralls, Randolph & Shelby*)

[Publications and Reports — Mark Twain Regional Council of Governments](#)

**Meramec RPC** (*Counties of Crawford, Dent, Gasconade, Maries, Osage, Phelps, Pulaski & Washington*)

[Publications - Meramec Regional Planning Commission](#)

**Mid-Missouri RPC** (*Counties of Boone, Callaway, Cole, Cooper, Howard & Moniteau*)

[Plans & Publications — Mid-Missouri Regional Planning Commission](#)

**MO-Kan Regional Council** (*Counties of Andrew, Buchanan, Clinton & DeKalb*)

<https://www.mo-kan.org/community/transportation-planning/>

**Northeast Missouri RPC** (*Counties of Adair, Clark, Knox, Lewis, Schuyler & Scotland*)

<https://nemorpc.org/plans-reports/>

**Northwest Missouri Regional Council of Governments** (*Counties of Atchison, Holt, Gentry, Nodaway & Worth*)

<https://www.nwmorcog.org/plansandreports>

**Ozark Foothills RPC** (*Counties of Butler, Carter, Reynolds, Ripley & Wayne*)

<https://www.ofrpc.org/rpcDetail.php?Transportation-Planning-4>

**Pioneer Trails RPC** (*Counties of Johnson, Lafayette, Pettis & Saline*)

<https://www.trailsrpc.org/transportation/public-transit-plan/>

**South Central Ozark Council of Governments** (*Counties of Douglas, Howell, Oregon, Ozark, Shannon, Texas & Wright*)

<https://www.scocog.org/transportation-tac.html>

**Southeast Missouri RPC & EDC** (*Counties of Bolinger, Cape Girardeau, Iron, Madison, Perry, St. Francois & Ste. Genevieve*)

<https://semorpc.org/planning/transportation-advisory-committee/>

**Southwest Missouri Council of Governments** (*Barry, Christian, Dade, Dallas, Greene, Lawrence, Polk, Stone, Taney & Webster*)

<https://www.smcoq.org/publications-regionalplans>

## References

References	Hyperlinks
29 U.S.C. Section 504 of the Rehabilitation Act of 1973	<a href="https://www.govinfo.gov/content/pkg/CFR-2002-title28-vol1/html/CFR-2002-title28-vol1-sec35-104-.htm">https://www.govinfo.gov/content/pkg/CFR-2002-title28-vol1/html/CFR-2002-title28-vol1-sec35-104-.htm</a>
49 U.S.C. 5335, National Transit Database	<a href="https://www.govinfo.gov/content/pkg/USCODE-2011-title49/html/USCODE-2011-title49-subtitleIII-chap53-sec5335.htm">https://www.govinfo.gov/content/pkg/USCODE-2011-title49/html/USCODE-2011-title49-subtitleIII-chap53-sec5335.htm</a>
2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards	<a href="https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200?toc=1">https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200?toc=1</a>
2 CFR Part 200, Subpart F Audit Requirements	<a href="https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-F">https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-F</a>
49 CFR Part 26, Participation by Disadvantaged Business Enterprises in Department of Transportation Financial Assistance Programs	<a href="https://www.ecfr.gov/current/title-49/subtitle-A/part-26?toc=1">https://www.ecfr.gov/current/title-49/subtitle-A/part-26?toc=1</a>
49 CFR Part 27, Nondiscrimination on the Basis of Disability in Programs or Activities Receiving Federal Financial Assistance	<a href="https://www.ecfr.gov/current/title-49/subtitle-A/part-27?toc=1">https://www.ecfr.gov/current/title-49/subtitle-A/part-27?toc=1</a>
49 CFR Part 37, Transportation Services for Individuals with Disabilities	<a href="https://www.ecfr.gov/current/title-49/subtitle-A/part-37">https://www.ecfr.gov/current/title-49/subtitle-A/part-37</a>
49 CFR Part 38, ADA Accessibility Specifications for Transportation Vehicles	<a href="https://www.ecfr.gov/current/title-49/subtitle-A/part-38?toc=1">https://www.ecfr.gov/current/title-49/subtitle-A/part-38?toc=1</a>
49 CFR Part 40, Procedures for Transportation Workplace Drug and Alcohol Testing Programs	<a href="https://www.ecfr.gov/current/title-49/subtitle-A/part-40">https://www.ecfr.gov/current/title-49/subtitle-A/part-40</a>
49 CFR Part 382, Controlled Substances and Alcohol Use and Testing	<a href="https://www.ecfr.gov/current/title-49/subtitle-B/chapter-III/subchapter-B/part-382">https://www.ecfr.gov/current/title-49/subtitle-B/chapter-III/subchapter-B/part-382</a>
49 CFR Part 604, Charter Service	<a href="https://www.govinfo.gov/content/pkg/CFR-2010-title49-vol7/pdf/CFR-2010-title49-vol7-part604.pdf">https://www.govinfo.gov/content/pkg/CFR-2010-title49-vol7/pdf/CFR-2010-title49-vol7-part604.pdf</a>

References	Hyperlinks
49 CFR Part 655, Prevention of Alcohol Misuse and Prohibited Drug Use in Transit Operations	<a href="https://www.ecfr.gov/current/title-49/subtitle-B/chapter-VI/part-655">https://www.ecfr.gov/current/title-49/subtitle-B/chapter-VI/part-655</a>
American Rescue Plan Act of 2021	<a href="https://www.transit.dot.gov/funding/american-rescue-plan-act-2021">https://www.transit.dot.gov/funding/american-rescue-plan-act-2021</a>
Buses and Bus Facilities Program (Section 5339)	<a href="https://www.transit.dot.gov/bus-program">https://www.transit.dot.gov/bus-program</a>
Congestion Mitigation-Air Quality	<a href="https://www.transportation.gov/sustainability/climate/federal-programs-directory-congestion-mitigation-and-air-quality-cmaq">https://www.transportation.gov/sustainability/climate/federal-programs-directory-congestion-mitigation-and-air-quality-cmaq</a>
Coronavirus Aid, Relief, and Economic Security Act of 2020	<a href="https://www.transit.dot.gov/cares-act">https://www.transit.dot.gov/cares-act</a>
Coronavirus Response and Relief Supplemental Appropriations Act of 2021	<a href="https://www.transit.dot.gov/funding/grants/coronavirus-response-and-relief-supplemental-appropriations-act-2021">https://www.transit.dot.gov/funding/grants/coronavirus-response-and-relief-supplemental-appropriations-act-2021</a>
Emergency Relief Program (Section 5324)	<a href="https://www.transit.dot.gov/funding/grants/grant-programs/public-transportation-emergency-relief-program-5324">https://www.transit.dot.gov/funding/grants/grant-programs/public-transportation-emergency-relief-program-5324</a>
Enhanced Mobility of Seniors and Individuals with Disabilities Program (Section 5310)	<a href="https://www.transit.dot.gov/regulations-and-guidance/fta-circulars/formula-grants-rural-areas-program-guidance-and-application">https://www.transit.dot.gov/regulations-and-guidance/fta-circulars/formula-grants-rural-areas-program-guidance-and-application</a>
Federal Emergency Management Agency Flood Maps	<a href="https://msc.fema.gov/portal/home">https://msc.fema.gov/portal/home</a>
Flood Disaster Protection Act of 1973, 42 U.S.C. § 4012a(a)	<a href="https://www.govinfo.gov/content/pkg/COMPS-1039/pdf/COMPS-1039.pdf">https://www.govinfo.gov/content/pkg/COMPS-1039/pdf/COMPS-1039.pdf</a>
Formula Grants for Rural Areas (Section 5311)	<a href="https://www.transit.dot.gov/rural-formula-grants-5311">https://www.transit.dot.gov/rural-formula-grants-5311</a>
FTA Certifications & Assurances	<a href="https://www.transit.dot.gov/funding/grantee-resources/certifications-and-assurances/certifications-assurances">https://www.transit.dot.gov/funding/grantee-resources/certifications-and-assurances/certifications-assurances</a>
FTA Circular 4220.1F, Third Party Contracting Guidance	<a href="https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/Third%20Party%20Contracting%20Guidance%20%28Circular%204220.1F%29.pdf">https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/Third%20Party%20Contracting%20Guidance%20%28Circular%204220.1F%29.pdf</a>
FTA Circular 4702.1, Title VI Requirements and Guidelines for FTA Recipients	<a href="https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf">https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf</a>
FTA COVID-19 Public Health Emergency Webpage	<a href="https://www.transit.dot.gov/regulations-and-programs/safety/using-your-safety-management-system-sms-mitigate-infectious-disease">https://www.transit.dot.gov/regulations-and-programs/safety/using-your-safety-management-system-sms-mitigate-infectious-disease</a>

References	Hyperlinks
Intercity Bus Program (Section 5311(f))	<a href="https://www.transit.dot.gov/rural-formula-grants-5311">https://www.transit.dot.gov/rural-formula-grants-5311</a>
Missouri Elderly and Handicapped Transportation Assistance Program	<a href="https://www.modot.org/transit-general-information">https://www.modot.org/transit-general-information</a>
Missouri State Statute (7 CSR 10-11)	<a href="https://www.sos.mo.gov/cmsimages/adrules/csr/current/7csr/7c10-11.pdf">https://www.sos.mo.gov/cmsimages/adrules/csr/current/7csr/7c10-11.pdf</a>
MoDOT Local Public Agency	<a href="https://www.modot.org/local-public-agency">https://www.modot.org/local-public-agency</a>
MoDOT State Transit Assistance Webpage	<a href="https://www.modot.org/transit-general-information">https://www.modot.org/transit-general-information</a>
MoDOT Transit Asset Management	<a href="https://www.modot.org/sites/default/files/documents/MoDOT%20Transit%20Sponsored%20Group%20TAM%20Plan%20Oct%202022_0.pdf">https://www.modot.org/sites/default/files/documents/MoDOT%20Transit%20Sponsored%20Group%20TAM%20Plan%20Oct%202022_0.pdf</a>
National Environmental Policy Act	<a href="https://www.transit.dot.gov/regulations-and-programs/environmental-programs/legislation-regulation-and-guidance">https://www.transit.dot.gov/regulations-and-programs/environmental-programs/legislation-regulation-and-guidance</a>
National Flood Insurance Act of 1968	<a href="https://uscode.house.gov/view.xhtml?path=/prelim@title42/chapter50&amp;edition=prelim">https://uscode.house.gov/view.xhtml?path=/prelim@title42/chapter50&amp;edition=prelim</a>
Public Transportation Innovation Program (Section 5312)	<a href="https://www.transit.dot.gov/funding/grants/transit-cooperative-research-program-5312i">https://www.transit.dot.gov/funding/grants/transit-cooperative-research-program-5312i</a>
Rural Technical Assistance Program (RTAP) (Section 5311(b)(3))	<a href="https://www.transit.dot.gov/funding/grants/rural-transportation-assistance-program-5311b3">https://www.transit.dot.gov/funding/grants/rural-transportation-assistance-program-5311b3</a>
Statewide Planning and Non-Metropolitan Transportation Planning (Section 5304)	<a href="https://www.transit.dot.gov/funding/grants/metro-politan-statewide-planning-and-nonmetropolitan-transportation-planning-5303-5304">https://www.transit.dot.gov/funding/grants/metro-politan-statewide-planning-and-nonmetropolitan-transportation-planning-5303-5304</a>
Surface Transportation Program	<a href="https://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title23-section133&amp;num=0&amp;edition=prelim">https://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title23-section133&amp;num=0&amp;edition=prelim</a>
Uniform Relocation Assistance and Real Property Acquisition Act	<a href="https://uscode.house.gov/view.xhtml?path=/prelim@title42/chapter61&amp;edition=prelim">https://uscode.house.gov/view.xhtml?path=/prelim@title42/chapter61&amp;edition=prelim</a>

## Revision History

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Revision 1: January 2025 – The MoDOT SMP was amended to accomplish the following objectives:

- Streamline the plan to only address MoDOT-specific policies.
- Remove redundancy and inconsistency in program policies.
- Reference external documents that outline MoDOT procedures for implementing its policies and/or to support various elements of the plan.
- Include the FTA provisions of the CARES Act of 2020, CRRSAA of 2021, ARP Act of 2021, and the Emergency Relief provisions of FTA Section 5324. These programs provided funding to assist public transportation providers respond to and address the additional financial needs and expanded safety requirements resulting from the impact of the Coronavirus 2019 (COVID-19) public health emergency.
- Update policies affected by the requirements associated with the Infrastructure Investment and Jobs Act (IIJA).
- Incorporate minor edits and corrections to promote clarity.

No other significant changes were made.