

# METROPOLITAN PLANNING ORGANIZATION

## Program Management Plan



PREPARED BY THE CHATHAM COUNTY - SAVANNAH METROPOLITAN PLANNING COMMISSION in cooperation with  
THE CHATHAM AREA TRANSIT AUTHORITY

CORE MPO is the Metropolitan planning Organization (MPO) Responsible for Chatham County transportation planning. The CORE MPO is comprised of the representatives of local, state and federal government and transportation authorities and ensures federal spending on transportation for urbanized areas of over 50,000 people occurs through a comprehensive, cooperative and continuing process involving both the public and policy-makers. The MPC provides staff services to the CORE MPO Board, which is chaired by the chairman of the Chatham County Board of County Commissioners.

Adopted October 24, 2007  
Revised April 30, 2009 and June 22, 2011





# Program Management Plan

for

**49 USC § 5316 – Job Access Reverse Commute (JARC)**

**49 USC § 5317- New Freedom Program**

**Coordinated Public Transit - Human Services Transportation for  
the Savannah Area**

Prepared for  
Chatham County – Savannah Metropolitan Planning Commission  
and the  
Chatham Area Transit Authority

By



Adopted October 24, 2007

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## Purpose

The Program Management Plan (PMP) is a document that describes a designated recipient's policies and procedures for administering the Federal Transit Administration (FTA) Job Access and Reverse Commute (JARC) Program and New Freedom Program (NFP). As the designated recipient for JARC and NFP funds, the Chatham Area Transit Authority (CAT) is required to have an approved PMP on file with the FTA Region IV Office and to update it regularly to incorporate changes in program management or new requirements. CAT must provide an opportunity for review by stakeholders when it develops a new plan or significantly revises an existing plan.

The PMP is intended to facilitate CAT program management as well as the program planning and administration that the Coastal Region Metropolitan Planning Organization (CORE MPO) will provide under agreement with CAT<sup>1</sup>. The PMP is also intended to facilitate FTA oversight by documenting policies and procedures for administering JARC and NFP. The primary purposes are to serve as the basis for the Federal Transit Administration to perform designated recipient-level management reviews of the programs and to provide public information on the administration of the programs.

## Statutory Authority - 49 USC § 5316 and § 5317

The Safe, Accountable, Flexible, and Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU, Pub. L. 109-059), enacted on August 10, 2005 and codified at 49 U.S.C Chapter 53, authorizes §5316, the Job Access and Reverse Commute (JARC) Program and §5317, the New Freedom Program (NFP), among others. The JARC program is meant to improve transportation services to employment and related activities for welfare recipients and other low-income individuals and to transport residents of urbanized and non-urbanized areas to suburban employment opportunities. The purpose of the NFP is to provide additional tools to overcome existing barriers facing Americans with disabilities seeking integration into the work force and full participation in society.

## Funding Apportionment

The Federal Transit Administration apportions funds nationally by formula based on the number of welfare recipients and other individuals with lower incomes (for JARC), and individuals with disabilities (for NFP). Sixty percent of the funds under each program are apportioned to designated recipients (such as CAT) in urbanized areas with a population of 200,000 or more (such as the Savannah urbanized area). Twenty percent of the funds are apportioned to states for urbanized areas with a population of 50,000 to 200,000. Twenty percent of the funds are apportioned to states for non-urbanized areas. CAT and CORE MPO will share the 10 percent of each year's apportionments for expenses related to administration, planning, and technical assistance associated with the programs.<sup>1</sup> Appropriated funds for the two programs within the annually-updated CORE MPO Transportation Improvement Program (TIP) are shown below:

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<sup>1</sup> CAT and CORE MPO signed a memorandum of understanding (MOU) on April 23, 2008 defining the cooperative roles of CAT as designated recipient and the agreed upon responsibilities of CORE MPO; the MOU established an equitable distribution of the 10% program funds for administration, planning, and technical assistance.



<u>Federal Fiscal Year</u>	<u>JARC</u>	<u>NFP</u>
2006 (appropriated):	\$134,548	\$72,577
2007 (appropriated):	\$141,828	\$70,682
2008 (appropriated):	\$153,647	\$76,355
2009 (appropriated):	\$180,341	\$88,012
2010 (appropriated):	\$172,427	\$86,379
2011 (appropriated):	\$172,168	\$86,825

## Direct Recipient/Sub Recipient Relationship

On December 21, 2007 the Governor of Georgia designated CAT the recipient of funding under the JARC and NFP. As the designated recipient, CAT is the direct recipient and may apply to FTA for funds awarded under the two programs. Awardees other than CAT that may be awarded funding through the competitive project selection process will be sub recipients of CAT, and CAT will pass funding through to any sub recipients.

## Designated Recipient Responsibilities

Per the federal guidance for JARC and New Freedom Programs, designated recipients are responsible for:

- a. Conducting an area-wide competitive project selection process;<sup>2</sup>
- b. Assuring a fair and equitable distribution of funds resulting from the competitive project selection process;
- c. Assuring that each project selected was derived from a locally developed, coordinated public transit - human services transportation plan;
- d. Certifying that local plans are developed through a process that included representatives of public, private, and non-profit transportation and human services providers and participation by the public. The designated recipient is not directly responsible for developing the coordinated plan, but is responsible for ensuring that the plan from which a selected project was derived was developed in compliance with the statutory requirements. An agency or organization other than the designated recipient may take the lead in developing the coordinated plan;<sup>3</sup>
- e. Managing all aspects of grant distribution and oversight for sub recipients receiving funds under this program; and
- f. Submitting reports as required by FTA.

<sup>2</sup> Although the designated recipients are responsible for conducting the competitive project selection process, they may establish alternative arrangements to administer and conduct the competitive process. Because CAT intends to apply for funding under both the JARC program and NFP, CORE MPO leads the competitive selection process to help ensure fair and equitable distribution of funds.

<sup>3</sup> CORE MPO, in partnership with CAT, conducted the coordinated planning process for the Savannah area and will maintain the coordinated plan.





## Local Planning Process - Public Outreach and Stakeholder Participation

Starting in Federal Fiscal Year 2007, projects funded through three programs included in SAFETEA-LU – Job Access and Reverse Commute (JARC - Section 5316), New Freedom (Section 5317) and Elderly Individuals and Individuals with Disabilities (Section 5310) - are required to be derived from a locally developed Coordinated Public Transit - Human Services Transportation Plan. SAFETEA-LU guidance issued by the Federal Transit Administration (FTA) indicates that the plan should be a “unified, comprehensive strategy for public transportation service delivery that identifies the transportation needs of individuals with disabilities, older adults, and individuals with limited income, lays out strategies for meeting these needs, and prioritizes services.” The minimum required plan contents include:

- Identification of current providers and services,
- Assessment of transportation needs of older adults, persons with disabilities, and individuals with low income as appropriate,
- Identification of strategies and/or activities to address those needs and service gaps,
- Implementation of priorities, based on time, resources, and feasibility.

Program guidance requires public outreach and public participation in the planning process. Partners, at a minimum, must include public, private, non-profit and human services transportation providers as well as representatives of target populations. Each area receiving funds is encouraged to identify and include other stakeholders in the service area.

In 2007, CORE MPO led the coordinated planning effort in Savannah and, in partnership with CAT, created a stakeholder resource group for the plan. In addition to the stakeholder resource group meetings, a public meeting was held to identify human services transportation needs and strategies to address those needs. The CORE MPO committees<sup>4</sup> were invited to attend the public meeting and were given the draft plan for review and comment. This effort was supplemented by placing public notices in the Savannah Morning News and other local magazines and papers regarding the public meeting, public hearings, and the availability of the draft coordinated plan. The coordinated plan meetings were also announced to the CORE MPO consulting agencies, local neighborhood associations, and on the CAT and CORE MPO websites. A copy of the draft plan was posted on the CORE MPO website; a link to the draft plan was posted on the CAT website.

Public input was provided through the two resource group meetings, one public meeting, and regular meetings of the CORE MPO committees during the months of September and October 2007. The Coordinated Plan (including the Program Management Plan) was adopted by the CORE MPO Board on October 24, 2007.

At least one stakeholder resource group meeting will be held each year. Besides evaluating and ranking all the received project proposals for the competitive project selection, the stakeholder resource group will review the Coordinated Plan and the Program Management Plan and update

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<sup>4</sup> The CORE MPO committees include the CORE MPO Board, the Technical Coordinating Committee (TCC), the Citizens Advisory Committee (CAC), and the Advisory Committee on Accessible Transportation (ACAT).



them as necessary. Any major revisions to the plans will go through a 15-day public comment period and the CORE MPO committees' review. The 2008 stakeholder resource group meeting was held on July 30 and the 2009 meeting was held on April 8. The 2009 updates to the Coordinated Plan and the Program Management Plan were adopted on April 30, 2009 by the CORE MPO Board. The 2010 Stakeholder Resource Group met on June 3, 2010 to evaluate project proposals for fiscal year 2010 JARC and New Freedom program funds. The 2011 Stakeholder Resource Group met on May 26, 2011 to evaluate project proposals for fiscal year 2011 JARC and New Freedom program funds. The 2011 updates to the plans were adopted by the CORE MPO Board on June 22, 2011.

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

Per federal guidance on JARC and NFP, the designated recipient, CAT, is responsible for conducting the competitive project selection process. The designated recipient may, however, establish alternative arrangements to administer and conduct the competitive process. CORE MPO, as an impartial entity, will lead the competitive selection process for the Savannah area.

As a convention, CORE MPO issues a project proposal solicitation announcement each year. The announcement describes the application, evaluation, and selection process for the JARC and NFP funds. CORE MPO responds to any questions by posting on the MPO website the questions and responses so that all applicants can benefit from any additional information. As necessary, CORE MPO may consult CAT staff for technical assistance in responding to questions. The stakeholder resource group established for the coordinated plan development reviews applications and makes recommendations to award the JARC and NFP grants to specific projects. The CAT Board of Directors and the CORE MPO committees will have an opportunity to review and comment on the selected projects. Funding for these selected projects will be included in the TIP for implementation.

Applicants may request funding for more than one year. Due to funding limitations, applicants may be approved for less funding than requested. The application content and project selection criteria that are used to evaluate the project proposals appear below.

### **JARC/NFP Application Content**

- A. Applicant Information – This addresses basic identifying information, including:
  - 1. Applicant name and contact information
  - 2. Brief description of services provided by agency, including areas served
  
- B. Project Information – Every proposal must:
  - 1. Describe the projects for which funding is requested.
  - 2. Address each of the selection criteria providing evidence that demonstrates how the project responds to each criterion.
  - 3. Provide a line-item budget for the project, including the Federal amount requested and the total cost for each purpose for which funds are sought, and the total



- Federal amount requested and total project cost.
4. Document the matching funds required per the Section 5316 and Section 5317 program guidance, including amount and source of the match.
  5. Provide a project time line, including significant milestones such as anticipated date for new service to begin.

## **Project Selection Criteria**

The selection criteria considered in ranking the potential strategies are listed below in four categories: consistency with current service or plans, quality of service, implementation, and coordination.

### **A. Consistency with Current Service or Plans**

1. Is this an existing service that would be eliminated without grant funding?
2. Does the project meet a transportation need within Chatham County as identified in the MPO's LRTP or TIP or CAT's TDP?
3. Does the project coordinate with services outside of Chatham County?

### **B. Quality of Service**

1. Does the service serve key employment destinations (reverse commute or potential low income employment destinations)?
2. Does the service extend service hours or geographic service area to fill a gap identified in the plan?
3. Does the service serve key human services destinations (medical facilities, DFCS offices, health department, etc.)?
4. Does the service address known transportation related issues faced by target populations?
5. Does the service simplify use for human services transportation groups?
6. Does the service fill gaps in existing infrastructure (related to accessibility, for example)?
7. Does the service respond to the travel patterns of local users?
8. Does the service improve transfers between operators, including private operators?
9. Does the service improve public awareness and information regarding human service transportation options?
10. Does the strategy use technology such as ITS to improve service to target groups?
11. Does the project serve or benefit individuals with disabilities, low income, or the elderly?

### **C. Implementation**

1. Is there sufficient administrative support to ensure implementation?



2. Is a local funding match available?
3. Can the service be implemented within a reasonable time frame?
4. Can the service maximize use of existing resources (vehicles, funds, etc.)?
5. Can the service improve efficiency to the existing service in terms of scheduling, dispatching and monitoring?

#### **D. Coordination**

1. Does the strategy improve coordination among service providers, including private sector service providers?
2. Does the service or strategy provide opportunities for collaborative funding between organizations (including private sector service providers or other organizations)?
3. Does the service or strategy minimize duplication of transportation services (e.g., overlapping routes or service areas)?

CORE MPO will facilitate the competitive selection process to evaluate the projects and make project funding recommendations. The project selection team is made up of members of the stakeholder resource group, including members that represent the interests of the elderly, individuals with disabilities and individuals with lower incomes as well as the general public. CAT is not represented on the project selection team but may be consulted for technical assistance.

The 1<sup>st</sup> round of competitive project selection was conducted in 2008. The stakeholder resource group met on July 30, 2008 to evaluate project proposals for JARC and NFP funds of fiscal years 2006, 2007 and 2008. The recommendation was to award the requested funds to the received proposals. A Program of Projects (POP) was developed at the end of the meeting. The POP was submitted to FTA and the funds have been applied for and allocated to the Savannah area.

The 2<sup>nd</sup> round of competitive project selection was conducted in 2009. The stakeholder resource group met on April 9, 2009 and evaluated all the proposals for fiscal year 2009 JARC and NFP funds. A Program of Projects was developed regarding the amount to be awarded to each selected project. Funds have been applied for and allocated to the Savannah area.

The 3<sup>rd</sup> round of competitive project selection was conducted in 2010. The stakeholder resource group met on June 3, 2010 and evaluated all the proposals for fiscal year 2010 JARC and NFP funds. A Program of Projects was developed regarding the amount to be awarded to each selected project. Funds have been applied for and allocated to the Savannah area.

The 4<sup>th</sup> round of competitive project selection was conducted in 2011. The stakeholder resource group met on May 26, 2011 and evaluated all the proposals for fiscal year 2011 JARC and NFP funds. A Program of Projects was developed regarding the amount to be awarded to each selected project. Grant application and funding allocation will take place after June 2011.



## Eligible Applicants

Those eligible to apply for JARC and NFP funding include:

1. Private nonprofit organizations;
2. State or local governmental authorities; and
3. Operators of public transportation services, including private operators of public transportation services.

## Eligible Project Costs and Funding Priorities

### Job Access and Reverse Commute Program

JARC funds are available for capital, planning, and operating expenses that support the development and maintenance of transportation services designed to transport low-income individuals to and from jobs and activities related to their employment and to support reverse commute projects. More detailed information on the program and project eligibility can be found in the Federal Transit Administration (FTA) guidance circular: FTA C 9050.1 at [http://www.fta.dot.gov/documents/FTA\\_C\\_9050.1\\_JARC.pdf](http://www.fta.dot.gov/documents/FTA_C_9050.1_JARC.pdf).

### New Freedom Program

NFP funds are available for capital, planning, and operating expenses that support new public transportation services beyond those required by the Americans with Disabilities Act of 1990 (ADA) and new public transportation alternatives beyond those required by the ADA designed to assist individuals with disabilities with accessing transportation services, including transportation to and from jobs and employment support services. For the purposes of NFP, “new” service is any service or activity that was not operational on August 10, 2005 (the date on which the program was enacted). In other words, if not for the NFP, these projects would not have consideration for funding and proposed service enhancements would not be available for individuals with disabilities. More detailed information on the program and project eligibility can be found in the Federal Transit Administration (FTA) guidance circular: FTA C 9045.1 at [http://www.fta.dot.gov/documents/FTA\\_C\\_9045.1\\_New\\_Freedom.pdf](http://www.fta.dot.gov/documents/FTA_C_9045.1_New_Freedom.pdf).

### Funding Priorities: Transportation Strategies

Through the coordinated plan development, the stakeholder resource group along with CORE MPO, CAT, and consulting staff developed a list of strategies to address the transportation needs of human service populations in the Savannah area. These strategies were prioritized for funding into four tiers based on the project selection criteria. The selection criteria fall into four categories - consistency with current service or plans, quality of service, implementation, and coordination.



The four tiers of transportation strategies selected include the following:

Top Tier priority projects are:

- #2 West Chatham route (Crossroads Business Center portion)
- #6 Cross-town route
- Savannah Belles Ferry service
- Express bus service to better transport target populations
- Expanded bus service or more efficient bus scheduling
- Taxi and vanpool operator incentives to purchase new accessible vehicles
- Continued activity of the MPO Advisory Committee on Accessible Transportation. This committee serves many roles for the MPO but can also address human services transportation planning and provision within the urbanized area.

Second Tier priority projects are additions to existing service, including:

- CAT Route 2 service expansion to include midday and increased trip frequency during peak periods
- Coordinate public transit service to Park and Ride lots with the CRC and the Liberty Transit to maximize funding and increase use of services
- Improve Teleride operations and explore potential for partnering with the CRC and the Liberty Transit to maximize funding and provide more efficient scheduling<sup>5</sup>
- Fixed route connection from elderly and disabled residential communities to retail destinations (e.g., grocery stores)

The Third Tier of projects includes longer term strategies to meet identified needs and strategies that may be better suited to other funding sources due to the service area (for example, service that primarily benefits the non-urbanized area that is eligible for non-urbanized area funding programs). These mid priority projects include:

- Travel training outreach and advertising to senior centers, special education classes, neighborhood associations, etc., on how to ride the fixed route bus service
- Purchase additional vehicles for Teleride service
- Public/private partnership outreach programs to employers to develop employer provided systems that tie into CAT<sup>6</sup>
- Public/private partnership to enhance employer transit benefits to employees<sup>7</sup>
- Service to regional park and ride lots

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<sup>5</sup> The improved Teleride service implemented a new scheduling system.

<sup>6</sup> This may include employer-sponsored shuttles or vanpool programs or employer incentives to use CAT or other public transportation services

<sup>7</sup> This may include reduced fees for group purchased transit passes or incentives to create employee operated vanpools.



- Extend Route 17 service on SR 204 from Savannah Festival Outlet Center to park and ride lot at SR 204 and I-95

The lower priority strategies in the Fourth Tier include:

- Travel trainer position and Community Transportation Association of America certification
- User surveys to assist with identifying and mitigating unmet needs
- Improved connectivity between Routes 2 and 6 and other CAT fixed routes
- Extend service west of I-95 to new residential developments
- Provide security at park and ride lots to increase use

## Federal and Local Funding Match Requirements

JARC and NFP funds can be used for capital, planning, or operating expenses. The Federal share for capital costs may not exceed 80 percent of the net cost of the activity, with a local match of not less than 20 percent required. Program planning and administration costs may be funded at 100 percent Federal share and do not require matching local funds. The Federal share of the eligible operating costs may not exceed 50 percent of the net operating costs of the eligible activity, with a local share of 50 percent required.

All of the local share must be provided from other than Federal Department of Transportation funds. Federal funds from other sources may be used for all or part of the “local” match. Income from contracts to provide human service transportation may be used either to reduce the net projects cost (i.e., treated as revenue) or to provide local match for operating assistance. In either case, the cost of providing the contract service is included in the total project cost. Other Federal funds that are eligible to be expended for transportation may be used for local match for activities included in the total net project costs of the FTA grant and include: employment training, community services, vocational rehabilitation services, and Temporary Assistance for Needy Families (TANF). Examples of other types of Federal funding that may be available as match can be found at: [www.unitedweride.gov](http://www.unitedweride.gov).

Other sources of local match include: State or local appropriations; dedicated tax revenues; private donations; and net-income generated from advertising and concessions.

## Administration, Planning and Technical Assistance

CORE MPO, in partnership with CAT, will maintain the Coordinated Plan for human services transportation. CORE MPO, as an impartial entity, will facilitate the competitive project selection process for JARC and NFP funds. A memorandum of understanding (MOU) included in the appendix was developed detailing an equitable distribution of the 10% of each year’s program apportionment for program administration, planning, and technical assistance based on the cooperative roles of CAT as the designated recipient and the agreed-upon responsibilities of CORE MPO. These funds are used for general administrative and overhead costs, staff salaries, office supplies, printing and public notices, web-site development, and similar expenses.



## **Federal Requirements Related to FTA Funding Assistance**

As the designated recipient and direct FTA recipient, CAT is responsible for managing all aspects of grant distribution and oversight of sub recipients receiving funds under this program, and submitting reports as required by FTA. CAT is responsible for ensuring compliance of itself and its sub recipients with all relevant Federal requirements.

FTA grantees and their sub recipients are held to a number of FTA-specific and other Federal requirements, including labor protections required under 49 U.S.C 5333(b) (labor protection requirements do not apply to NFP). Chapter 8 of the FTA program guidance circulars cited in this plan summarizes those requirements and provides citations to the actual statutory or regulatory text. Sub recipients should carefully review all requirements provided in the circulars, as well as the statutory and regulatory bases for FTA issued guidance to ensure a thorough understanding of their responsibilities related to Federal requirements. Grantees make legal affirmation to abide by FTA and other Federal requirements by signing a Master Agreement and the current fiscal year Certifications and Assurances. CAT, as the direct recipient of FTA funding, will enter into agreements with sub recipients that include relevant requirements including but not limited to the following:

### **Private Sector Participation**

Federal law requires the public to be involved in the transportation planning process, and specifically requires that private providers be provided an opportunity to be consulted in developing transportation plans. Public involvement processes must be proactive and provide complete information, timely public notice, full public access to key decisions, and opportunities for early and continuing involvement throughout the transportation planning and programming process.

The participation process of the CORE MPO/CAT coordinated planning includes public meetings being announced in widely read area newspapers, on the CAT and CORE MPO websites and at other public meetings such as the CORE MPO committee meetings and various others. Public input can be provided through the public meetings and at hearings during the regularly held CORE MPO committee meetings.

The project selection criteria include criteria related to private sector cooperation. Maximum feasible participation by private sector providers is fostered by awarding project evaluation points for strategies that improve coordination and cooperation between public and private transportation services.

### **Civil Rights**

CAT and its sub recipients, through an interagency agreement, will certify compliance with the requirement of Title VI, Equal Employment Opportunity (EEO), and Disadvantaged Business Enterprise (DBE) laws and regulations. Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color and national origin for programs and activities receiving Federal financial assistance. Six Federal laws enacted between 1964 and 1991 comprise the Federal Equal Employment Opportunity (EEO) program, which prohibit job discrimination based on race, color, religion, sex, national origin, age, disabilities and provide for





monetary damages in cases of intentional employment discrimination.

The U.S. Department of Transportation’s Disadvantaged Business Enterprise (DBE) program, authorized by TEA-21 and continued in SAFETEA-LU, is intended to ensure nondiscrimination in the award and administration of DOT-assisted contracts and sub agreements. CAT, as a recipient of FTA funds, has implemented and will require its sub recipients to have implemented a Disadvantaged Business Enterprise Program in accordance with 49 CFR part 26. As such, CAT and its sub recipients shall never exclude any person from participating in, deny any person the benefits of, or otherwise discriminate against anyone in connection with the award and performance of any contract covered by CAT’s DBE program on the basis of race, color, sex or national origin.

## **Section 504 and Americans with Disabilities Act (ADA)**

CAT agrees to comply, and assures the compliance of each third party contractor and each sub recipient at any tier of the Project, with the applicable laws and regulations, discussed below, for nondiscrimination on the basis of disability.

- (1) Section 504 of the Rehabilitation Act of 1973 (Section 504), as amended (29 U.S.C. 794), prohibits discrimination on the basis of disability by recipients of Federal financial assistance.
- (2) The Americans with Disabilities Act of 1990 (ADA), as amended (42 U.S.C. 12101 et seq.), prohibits discrimination against qualified individuals with disabilities in all programs, activities, and services of public entities, as well as imposes specific requirements on public and private providers of transportation.
- (3) U.S. DOT regulations implementing Section 504 and the ADA include 49 CFR parts 27, 37, and 38. Among other provisions, the regulations specify accessibility requirements for the design and construction of new transportation facilities; require that vehicles acquired (with limited exceptions) be accessible to and usable by individuals with disabilities, including individuals using wheelchairs; require public entities, including a private non-profit entity “standing in the shoes” of the State as a sub recipient providing fixed-route service, to provide complementary paratransit service to individuals with disabilities who cannot use the fixed-route service; and include service requirements intended to ensure that individuals with disabilities are afforded equal opportunity to use transportation systems.

In addition, recipients of any FTA funds should be aware that they also have responsibilities under Titles I, II, III, IV and V of the ADA in the areas of employment, public services, public accommodations, telecommunications, and other provisions, many of which are subject to regulations issued by other Federal agencies.

## **Sub Recipient Financial Management**

CAT will develop and execute grant agreements for any sub recipients selected for funding under the programs. CAT executes the agreements after the FTA funds are secured. All grant agreements for capital projects detail the equipment approved for purchase and its intended use.



Agreements for operations assistance outline the type of service provided by the sub recipient, the time period covered by the agreement, and the service area.

All funding for expenses incurred under both programs is provided on a reimbursement basis. CAT will reimburse the sub recipient with the federal funds based on the proportions identified in the grant agreement. Sub recipients will retain the original receipts for all eligible project expenditures. In the case of capital projects, sub recipients must attach copies of vendor invoices to reimbursement requests. Sub recipients receiving operations assistance are not required to submit copies of all vendor invoices. However, they must retain copies in their offices for verification of expenses during CAT site visits.

## **Program Management**

CAT will enter into a written agreement with each sub recipient that may be funded under the two programs stating the terms and conditions of assistance by which the project will be undertaken and completed. CAT will monitor all local projects to ensure that sub recipients have met or will meet all Federal requirements consistent with U.S. DOT regulations, “Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments,” 49 CFR part 18 (the “common rule” or “common grant rule”), and “Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and other Non-profit Organizations,” 49 CFR part 19.

CAT will visit each sub recipient at least once a year to monitor compliance with Federal requirements and program guidance. CAT will use a checklist (to be developed) and provide a summary of each visit, which it will keep on file and may make available to FTA during any Federal program management reviews.

## **Program Reporting Requirements**

CAT is responsible for ensuring certain reports are provided to FTA each year. In order to provide these reports for services provided by CAT and its sub recipients, it will be necessary for CAT to collect certain data from each sub recipient. The reports that CAT will provide to FTA each year are:

### **Annual Program of Projects Status Reports**

CAT will submit quarterly status reports that include an updated Program of Projects (POP) for each approved grant which contains active projects. The updated POP reflects project descriptions, changes in projects from one category to another, and adjustments if applicable. Significant civil rights compliance issues occurring during the year (such as Title VI, Equal Employment Opportunity (EEO), or Disadvantaged Business Enterprise (DBE) Program complaints against CAT or sub recipients) will be addressed in the annual status report. CAT will also report notable accomplishments or problems involving JARC or NFP sub recipients.

### **Milestone Activity Reports**

For activity line items for which milestones were required at the time of recipient application (for



example, for vehicle procurements, construction projects, and program reserve), CAT will provide revised milestone dates as part of the report. If the estimated completion date for the grant has changed, the revised date will be provided with an explanation as to why the date has changed.

## Financial Status Report

CAT submits quarterly Financial Status Reports. For the purpose of this report, funds are considered encumbered when agreements are signed with sub recipients. Reports are prepared using the accrual method of accounting.

## Program Measures

FTA will be capturing overall program measures to be used with the Government Performance Results Act (GPRA) and the Performance Assessment Rating Tool process for the Office of Management and Budget. The following indicators are targeted to capture overarching program information as part of CAT's POP status report for the JARC program:

Actual or estimated number of jobs that can be accessed as a result of geographic or temporal coverage of JARC projects implemented in the current reporting year.

Actual or estimated number of rides (as measured by one-way trips) provided as a result of the JARC projects implemented in the current reporting year.

The following indicators are targeted for the NFP:

Services provided that impact availability of transportation services for individuals with disabilities as a result of the New Freedom projects implemented in the current reporting year. Examples include geographic coverage, service quality and/or service times.

Additions or changes to environmental infrastructure (e.g., transportation facilities, sidewalks), technology, vehicles that impact availability of transportation services as a result of the New Freedom projects implemented in the current reporting year.

Actual or estimated number of rides (as measured by one-way trips) provided for individuals with disabilities as a result of the New Freedom projects implemented in the current reporting year.

## Disadvantaged Business Enterprise (DBE) Reports

Recipients that receive planning, capital, and/or operating assistance and will award prime contracts exceeding \$250,000 in FTA funds in a fiscal year must have a DBE program. All sub recipients that receive planning, capital, and/or operating assistance and will award prime contracts exceeding \$250,000 in FTA funds in a fiscal year must also have a DBE program and submit a DBE program goal to FTA for review by August 1 of each year.



# Appendix: Memorandum of Understanding

**Memorandum of Understanding  
between  
the Metropolitan Planning Commission and the Chatham Area Transit Authority  
for Program Administration Associated with  
Section 5316 Job Access Reverse Commute and Section 5317 New Freedom**

## Purpose

This Memorandum of Understanding (MOU) serves as a joint agreement between the Chatham County–Savannah Metropolitan Planning Commission (hereinafter referred to as the MPC) and the Chatham Area Transit Authority (hereinafter referred to as CAT) for the planning, project selection, administration and management of the Section 5316 and Section 5317 programs within the Savannah Urbanized Area as established by the Federal Transit Administration (FTA).

## Background

The Safe, Accountable, Flexible, and Efficient Transportation Equity Act – A Legacy for Users (SAFETEA-LU), the current Federal legislation authorizing funding for transportation, requires the establishment of a locally developed Coordinated Public Transit - Human Services Transportation Plan (hereinafter referred to as the Coordinated Plan) for all FTA human service transportation programs as follows: Section 5310 Elderly Individuals and Individuals with Disabilities Program, Section 5316 Job Access and Reverse Commute Program (JARC) and Section 5317 New Freedom Program (NFP). The Coordinated Plan shall identify the transportation needs of the disabled, the elderly, and the economically disadvantaged and provide strategies for meeting these needs. Funding and implementation for the identified transportation services and strategies must be prioritized. Specific projects or strategies identified for funding must be included in the adopted Transportation Improvement Program (TIP).

In urbanized areas over 200,000 in population, the chief executive officer of the State must designate one or more public bodies to be the recipient of the Sections 5310, 5316 and 5317 program funds. The designated recipient roles include:

- Conducting an area-wide competitive project selection process;
- Certifying a fair and equitable distribution of funds resulting from the competitive selection process;
- Certifying that each project selected for funding was derived from a locally developed, coordinated public transit-human services transportation plan;
- Certifying that local plans are developed through a process that included representatives of public, private, and non-profit transportation and human services providers and



- participation by the public;
- Pass-through of grant funds to all eligible sub-recipients;
- Managing all aspects of grant distribution and oversight for sub-recipients receiving funds under the programs; and
- Submitting reports as required by FTA.

In order to effectively manage the Sections 5310, 5316 and 5317 programs, the designated recipient is required by SAFETEA-LU to develop a Program Management Plan (PMP) to delineate policies and procedures for administering the program funds.

In the State of Georgia, the Governor has designated the Georgia Department of Human Resources (DHR) as the recipient and administrator of the 5310 program funds.

For the Savannah Urbanized Area, CAT, as the operator of the public transit system in Chatham County, has been designated the recipient of the Sections 5316 and 5317 program funds by the Governor.

The CORE/MPO<sup>8</sup> in cooperation with CAT took the lead in developing the Coordinated Plan and the Program Management Plan for the Savannah area in compliance with the statutory requirements. The Coordinated Plan and the Program Management Plan for the Savannah area were adopted by the CORE MPO Board in October 2007.

## **Roles and Responsibilities**

Because of conflict of interest, as designated recipient of the Sections 5316 and 5317 program funds, CAT will delegate the annual competitive project selection process to CORE MPO, thus MPC will share the 10% of each year's JARC and NFP apportionment funds to the Savannah area. This MOU describes this arrangement as follows.

### ***CAT***

As the designated recipient of JARC and NFP funds for the Savannah area, CAT takes the following responsibilities:

- Collaborate with MPC in ensuring that each project selected for JARC and New Freedom funding was derived from the Coordinated Public Transit-Human Services Transportation Plan.
- Submit a Program of Projects to FTA. This is a list of projects to be funded in the JARC and New Freedom grant application(s). The program of projects will list the sub-recipients and indicate whether they are private non-profit agencies, public bodies, or private providers of transportation service and identify the areas served. In addition, the

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<sup>8</sup> CORE MPO is the Metropolitan Planning Organization (MPO) for Chatham County and is charged with transportation planning and project selection in the area. MPC provides staff support to CORE MPO.



program of projects includes a brief description of the projects, total project cost and federal share for each project.

- Submit all reports as required by FTA (such as TEAM reporting) for those projects in which CAT is the direct recipient of funds.
- Apply for JARC and NFP funds through FTA.
- Pass through JARC and NFP funds to sub-recipients.
- Manage grant distribution and provide oversight for sub-recipients as outlined in the adopted Program Management Plan.
- Maintain and update the Program Management Plan to reflect the most recent program guidance and implementation change consistent with updates to the Coordinated Plan.

### ***CORE/MPO - MPC***

As an impartial planning entity, the MPC (through the CORE MPO planning process) has the following role to play:

- Maintain and update the Coordinated Public Transit – Human Services Transportation Plan to ensure projects included in the plan are derived from the coordinated planning process that includes representatives of public, private and non-profit transportation service providers and participation by the public.
- Notify eligible local entities of funding availability and conduct “Call for Projects” through public notices or other participation process.
- Conduct the competitive project selection process for JARC and NFP funds with the annual TIP update cycle. Selection of projects to be included in the TIP will be based on the selection process and criteria established in the adopted Coordinated Plan.
- Amend Long Range Transportation Plan (LRTP) and TIP when and where needed to ensure that the projects selected for JARC and NFP funding are consistent with the CORE MPO LRTP and are included in the CORE MPO TIP and the Statewide Transportation Improvement Program (STIP).
- Collaborate with CAT in certifying to FTA that each project selected for JARC and NFP funding was derived from the current Coordinated Plan.
- Assist CAT in submitting the Program of Projects to FTA by providing a draft.
- Provide technical assistance to CAT in JARC and NFP funding application process where needed.

The following lists the roles and responsibilities of MPC and CAT in administering the JARC and NFP funds in a tabular format. It is apparent that MPC and CAT will be coordinating efforts in undertaking the tasks.



<b>Roles and Responsibilities Regarding Management of JARC and NFP Funds</b>	
<b>CORE MPO - MPC</b>	<b>CAT</b>
Maintain and update the Coordinated Public Transit – Human Services Transportation Plan to ensure projects included in the plan are derived from the coordinated planning process that includes representatives of public, private and non-profit transportation service providers and participation by the public.	Collaborate with MPC in ensuring that each project selected for JARC and New Freedom funding was derived from the Coordinated Public Transit-Human Services Transportation Plan.
Notify eligible local entities of funding availability and conduct “Call for Projects” through public notices or other participation process.	
Conduct the competitive project selection process for JARC and NFP funds with the annual TIP update cycle. Selection of projects to be included in the TIP will be based on the selection process and criteria established in the adopted Coordinated Plan.	
Collaborate with CAT in certifying to FTA that each project selected for JARC and NFP funding was derived from the current Coordinated Plan.	
Assist CAT in submitting the Program of Projects to FTA by providing a draft.	Submit a Program of Projects to FTA. This is a list of projects to be funded in the JARC and New Freedom grant application(s). The program of projects will list the sub-recipients and indicate whether they are private non-profit agencies, public bodies, or private providers of transportation service and identify the areas served. In addition, the program of projects includes a brief description of the projects, total project cost and federal share for each project.
Provide technical assistance to CAT in JARC and NFP funding application process where needed.	Submit all reports as required by FTA (such as TEAM reporting) for those projects in which CAT is the direct recipient of funds.
Amend Long Range Transportation Plan (LRTP) and TIP when and where needed to ensure that the projects selected for JARC and NFP funding are consistent with the CORE MPO LRTP and are included in the CORE MPO TIP and the Statewide Transportation Improvement Program (STIP).	Apply for JARC and NFP funds through FTA
	Maintain and update the Program Management Plan to reflect the most recent program guidance and implementation change consistent with updates to the Coordinated Plan.
	Pass through JARC and NFP funds to sub-recipients.
	Manage grant distribution and provide oversight for sub-recipients as outlined in the adopted Program Management Plan.



## Annual Allocation of Administration Costs

For the JARC and New Freedom programs, up to 10 percent of the annual allocation to the Savannah area may be used to fund program administration costs, which include administrative, planning and technical assistance activities. Program administration costs may be funded at 100 percent Federal share. At the beginning of each federal fiscal year, CAT and MPC staff will estimate program administration costs for the upcoming year for their respective agencies within the grant guidelines. Of the 10 percent of total allocation of JARC and NFP funds, the funding split between MPC and CAT shall be 70 percent MPC and 30 percent CAT.

## Update of MOU

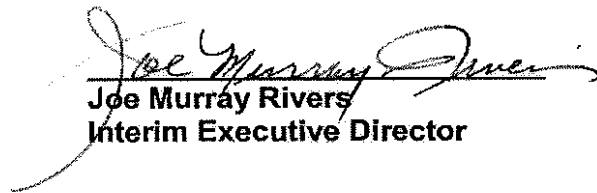
MPC and CAT will track and monitor the administration cost associated with the JARC and NFP funding allocation. The administration cost allocation split between MPC and CAT will be reevaluated and this Memorandum of Understanding (MOU) will be revisited and updated two years after the execution of this contract.

## Conclusion

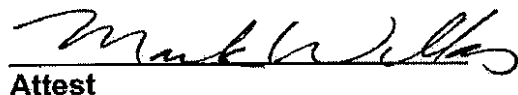
In signing the MOU, the undersigned understand and accept the roles and responsibilities assigned to each of the parties. Each of the parties agrees to pursue maximum cooperation and communication to ensure that the goals and objectives of the Job Access and Reverse Commute Program and the New Freedom Program are supported in accordance with federal guidelines.

Agreed to and accepted on this 23<sup>rd</sup> day of April, 2008, by and between:

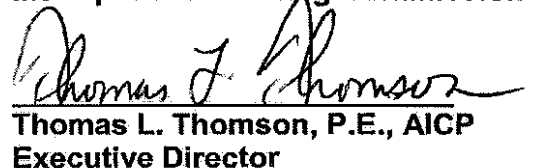
### Chatham Area Transit Authority

  
Joe Murray Rivers  
Interim Executive Director

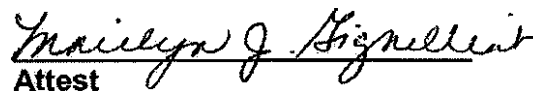
4-23-08  
Date

  
Attest

### Metropolitan Planning Commission

  
Thomas L. Thomson, P.E., AICP  
Executive Director

April 23 2008  
Date

  
Attest

