

Interview Guide for Kansas 5310 Sub-recipients

Transit Agency:
Agency Representative Name:
Agency Contact Information:
Address:
Phone:
Email:

Instructions for Use: Complete all applicable information and forward this questionnaire and the requested documents prior to the scheduled site visit date. Please respond to every question.

If you have any questions, please contact the reviewer.
Reviewer Name:
Email:
Phone:
Date of Site Visit:

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Introduction

1. **Description of Agency** (as it pertains to transportation including services provided, service area, organizational structures, etc.)



2. **Description of All Services** (include main services and clients served)



3. **Required Documentation.** The following checklist indicates that some documentation should be provided to the reviewer prior to the site visit and other documentation must be available on-site during the review.

SECTION 1: Eligibility

Question 1.01
Are all vehicles (owned/not owned) providing service as part of transportation program marked with 'General Public Transportation' on both sides? Are KDOT decals properly posted?
Acceptable Response
5310 agencies are allowed to respond with a yes or no. This is asked, to confirm general public transportation is not displayed on 5310 vehicles that may at some point have been in the 5311 program. The KDOT decal should also be properly displayed on the vehicle.
FTA Guidance or Regulation
<p>-“KDOT will issue a KDOT Public Transit Network decal to all agencies when they receive a new transit vehicle. The small decals go on the lower right-hand side of the back door on all 5-7 passenger mini-van or ramp mini-vans. The large decal is to be placed on the back door of the 12, 13, 14 and 20 passenger vans on the lower right-hand side.”</p> <p>-“Vehicles being used in the 5311 program must be labeled with the words GENERAL PUBLIC TRANSPORTATION and the local agency telephone number. Public transportation service providers are not allowed to include logos or marking that specify specific clientele. “</p> <p>-“Agencies approved to participate in the Regional Rural Transportation program will be required to label all vehicles with the approved Kansas Rides logo and labeling.” (KDOT Policy Manual – Office of Public Transportation, 2018, pages 20-21)</p>
Documentation Required
N/A

Question 1.02
Describe any “incidental” services provided with federally-funded vehicles the agency or its subcontractors provide, and when those services are provided. e.g., (meal service)
Acceptable Response
Agency should describe any incidental use of the transit vehicle(s). 5310 agencies are NOT prohibited from providing incidental services. This is more relevant for 5311 agencies, since they are general public transportation providers. Any services offered by 5311 agencies which are not available to the general public are under closer regulation than for 5310 agencies which do not provide general public transportation.
FTA Guidance or Regulation
“For 5311 and/or 5339 programs, meal delivery, delivery of goods, or personal errands with a KDOT program vehicle is strictly prohibited.” (KDOT Policy Manual – Office of Public Transportation, 2018, page 30)
Documentation Required
N/A

<p>Question 1.03 Has the agency's Title VI plan been forwarded to KDOT for review?</p>
<p>Acceptable Response Yes. If the agency is unsure, they can email their Title VI plan to Mike Spadafore at KDOT. His email address is mike.spadafore@ks.gov.</p>
<p>FTA Guidance or Regulation "FTA requires that all direct and primary recipients document their compliance by submitting a Title VI Program to their FTA regional civil rights officer once every three years." (FTA Circular 4702.1B, 2012, page 18)</p>
<p>Documentation Required Yes. Forward a copy of Title VI Plan (before site visit)</p>

<p>Question 1.04 If so, does the Title VI plan contain the required elements:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Notice of Rights under Title VI <input type="checkbox"/> How to file a complaint, copy of complaint form <input type="checkbox"/> List of Title VI investigations, complaints or lawsuits <input type="checkbox"/> Public Participation Plan <input type="checkbox"/> Limited English Proficiency Plan (LEP) <input type="checkbox"/> Board of Directors' resolution or meeting minutes demonstrating the Board approved the Title VI Plan <input type="checkbox"/> Racial breakdown of Non-elected Advisory Councils
<p>Acceptable Response The agency's plan must include all the above items. These items were reviewed prior to the site visit.</p>
<p>FTA Guidance or Regulation -"Transportation services providers must have a Title VI plan and policies in place that address procedures for special needs, service animals and the complaint or grievance process." (KDOT Policy Manual – Office of Public Transportation, 2018, page 29)</p>
<p>Documentation Required Yes. A copy of the plan is required. (before site visit)</p>

<p>Question 1.05</p> <p>If submitted, does the LEP Plan contain the required elements?</p> <p>_____ Results of the Four Factor Analysis</p> <p>_____ How the sub-recipient provides language assistance services by language</p> <p>_____ How the sub-recipient monitors, evaluates and updates the language access plan</p> <p>_____ How the sub-recipient trains employees to provide timely and reasonable language assistance to LEP populations</p>
<p>Acceptable Response</p> <p>The agency's plan must include all the above items. These items were reviewed prior to the site visit.</p>
<p>FTA Guidance of Regulation</p> <p><u>"9. Requirement to Provide Meaningful Access to LEP Persons.</u></p> <p>a. Four Factor Analysis. In order to ensure meaningful access to programs and activities, recipients shall use the information obtained in the Four Factor Analysis to determine the specific language services that are appropriate to provide. A careful analysis can help a recipient determine if it communicates effectively with LEP</p> <p>b. Developing a Language Assistance Plan. After completing the Four Factor Analysis, the recipient shall use the results of the analyses to determine which language assistance services are appropriate." (FTA Circular 4702.1B, 2012, page 27 and 28)</p>
<p>Documentation Required</p> <p>Yes. A copy of the plan is required. (before site visit)</p>

<p>Question 1.06</p> <p>Where are Title VI posters located?</p>
<p>Acceptable Response</p> <p>Provide proof of posters displayed in reviewed vehicle the organization's main building location, and on the agency's website. The poster should be clearly visible in an area where all clients can access.</p>
<p>FTA Guidance or Regulation</p> <p><u>"5. REQUIREMENT TO NOTIFY BENEFICIARIES OF PROTECTION UNDER TITLE VI.</u></p> <p>Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, recipients shall disseminate this information to the public by posting a Title VI notice on the agency's website and in public areas of the agency's <u>office(s), including the reception desk, meeting rooms,</u> etc. Recipients should also post Title VI notices <u>at stations or stops, and/or on transit vehicles.</u>" (FTA Title VI Requirements for FTA Recipients, 2012, page 24)</p>
<p>Documentation Required</p> <p>Yes. Provide a picture offering proof the poster is displayed in a public area of the office, on the agency's website, and in all KDOT vehicles.</p>

Question 1.07 Where are Title VI brochures located?
Acceptable Response Provide proof of brochures in reviewed vehicle and the organization's main building location. If the agency does not have copies of the brochure, they can access a copy on the KDOT website and print it out. Refer to this link to find a copy of the English and Spanish brochure. https://www.ksdot.org/BurTransPlan/pubtrans/index.asp
FTA Guidance or Regulation <i>"b. Effective Practices for Fulfilling the Notification Requirement.</i> (1) <u>Dissemination</u> . Agencies shall inform the public of their rights under Title VI through such measures as posting the Title VI notice on posters, comment cards, or flyers placed at stations , bus shelters, and in transit vehicles . The type, timing, and frequency of these measures are at the recipient's discretion, as long as the type, timing, and frequency are sufficient to notify passengers and other interested persons of their rights under DOT's Title VI regulations with regard to the recipient's program." (FTA Title VI Requirements for FTA Recipients, 2012, page 24)
Documentation Required Yes. Provide a picture offering proof the brochures are displayed in a public area of the office and in all KDOT vehicles.

Question 1.08 Where are Title VI complaint forms located?
Acceptable Response Have complaint forms available at the agency's office location(s). It is common for the transportation director to have copies of this form available in their office.
FTA Guidance or Regulation <u>"Requirement to Develop Title VI Complaint Procedures and Complaint Form:</u> In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), all recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form, and the form and procedure for filing a complaint shall be available on the recipient's website..." (FTA Title VI Requirements for FTA Recipients, 2012, page 25)
Documentation Required Yes. A copy of the complaint form. Usually included in the Title VI Plan.

SECTION 2: Management

Question 2.01
Are required EEO posters displayed at transit agency office, contractors' offices, transit garage, etc.?
Acceptable Response
Yes. The agency must show this poster is clearly visible for all transportation department staff. Posters are usually found in employee break rooms.
FTA Guidance or Regulation
Per KDOT.
Documentation Required
Yes. Provide proof that EEO posters are displayed in a common area where employees can access. Take a picture of the proof as well.

Question 2.02
Does the agency have receipts for KDOT reimbursement requests?
Acceptable Response
Per Cory Davis – we will print a sample reimbursement request from Black Cat. The reviewer will then use the reimbursement requests provided by KDOT and compare them with the matching receipts provided by the agency. This will be used as a sort of check to confirm agencies are keeping track of expenses and not just filling out expense forms blindly online.
FTA Guidance or Regulation
“The State of Kansas mileage and meal rates will be used when a provider is requesting reimbursement for attending training. Transit providers should keep all receipts for reimbursement requests (meals, registration fees, motel or hotel room fees, turnpike fees, and parking fees) at their agency office and have them available for review when KDOT does the triennial on site review.” (KDOT Policy Manual – Office of Public Transportation, 2018, page 18)
Documentation Required
Yes. Receipts for KDOT reimbursement requests.

Question 2.03
Does the agency have proof of payroll taxes deducted from employee's paycheck?
Acceptable Response
The provider should have employee paycheck stubs or 941 IRS forms.
FTA Guidance or Regulation
“The deduction of payroll taxes from the employee's paycheck and the completion of all required Federal or State employer reporting requirements will be verified when KDOT staff completes the triennial on-site review.” (KDOT Policy Manual – Office of Public Transportation, 2018, page 16 - 17)
Documentation Required
Yes.

Question 2.04 Does the agency transport individuals across state lines with a KDOT-funded vehicle? (If no, skip Questions 2.05-2.07 and go to Section 3.)
Acceptable Response Yes or no.
FTA Guidance or Regulation K.A.R. 82-4-3, Mike J. Hoeme Director of Transportation Division, Kansas Corporation Commission.
Documentation Required N/A

Question 2.05 Is the agency a city or county government that sponsors public transportation services? (If yes, skip Questions 2.06-2.07 and go to Section 3.)
Acceptable Response Yes or no.
FTA Guidance or Regulation K.A.R. 82-4-3, Mike J. Hoeme Director of Transportation Division, Kansas Corporation Commission.
Documentation Required N/A

Question 2.06 Does the agency use a vehicle with a capacity of more than 8-passengers for trips across state lines? (If no, skip Question 2.07 and go to Section 3.)
Acceptable Response Yes or no.
FTA Guidance or Regulation K.A.R. 82-4-3, Mike J. Hoeme Director of Transportation Division, Kansas Corporation Commission.
Documentation Required N/A

<p>Question 2.07 Describe the type of trips being offered and the rider type. Are there other available vehicles that could be used for trips across state lines? If yes, what is the capacity of those vehicle(s)? Are they registered with the KCC? Do the vehicles have a DOT# and a federal MC#?</p>
<p>Acceptable Response Have agency indicate the services provided across state lines. Identify any other potential vehicles to use across state lines.</p>
<p>FTA Guidance or Regulation "All transit service providers that choose to cross the state line to provide transportation services must comply with the interstate passenger regulations under the Kansas Commerce Commission (KCC), the Federal Highway Administration (FHWA), and the Federal Motor Carriers Safety Administration (FMCSA). The regulatory guidance for each agency can be found on their website or by contacting the agency office." (KDOT Policy Manual – Office of Public Transportation, 2018, page 30)</p>
<p>Documentation Required N/A</p>

SECTION 3: General ADA

Question 3.01
Do you have at least one ADA accessible vehicle in the fleet? If so, how many?
Acceptable Response
Responses vary between agencies. We'll be asking this question also to get an idea of how many vehicles the agency has in their fleet currently.
FTA Guidance or Regulation
-All applicants are required to have at least one ADA vehicle (ramp mini-van or cutaway van with lift and restraint system) for every 5 vehicles in their KDOT fleet, or, for fleets larger than 30, at least 6 ADA vehicles. If there are no KDOT funded ADA vehicles in the agency fleet and the applicant is applying for a new KDOT vehicle, they must apply for an ADA vehicle. . (KDOT Policy Manual – Office of Public Transportation, 2018, page 57)
Documentation Required
N/A

Question 3.02
How does the agency handle the situation if the agency receives a ride request from a person using a wheelchair in an area or at a time when a non-ADA vehicle is normally used?
Acceptable Response
Responses vary between agencies. Yes or no response expected.
FTA Guidance or Regulation
“For example, for subrecipients purchasing inaccessible vehicles with § 5310 funds, this means being prepared to demonstrate they are providing equivalent levels of service to individuals with disabilities, including those who use wheelchairs. If an award to a subrecipient that provides closed-door service to its own clientele includes inaccessible vehicles, the subrecipient must have a process in place to ensure that equivalent service is provided as needed, either by the private nonprofit that alters its vehicle fleet composition, or through a third-party contract or other arrangement with another subrecipient or contractor.” (ADA FTA C 4710.1, 2015, page 17)
Documentation Required
N/A

Question 3.03

Does the agency require wheelchairs be secured in the transit vehicle?

Acceptable Response

Agencies should have a clear policy on whether or not they require wheelchairs to be secure. Transit agencies *can* adopt a policy that allows wheelchair riders to ride unsecured. Agencies can also adopt a policy that declines service to a rider who refuses to allow his or her wheelchair to be secured. This should be described in the rider or driver handbook. A transit operator *cannot* decline service to a rider if the driver has difficulty securing the wheelchair.

Example Policy: Drivers will assist in securing wheelchairs or mobility devices but cannot deny passengers whose device cannot be secured and will not require a passenger to transfer to a seat.

FTA Guidance or Regulation

“(1) For vehicles complying with Part 38 of this title, the entity shall use the securement system to secure wheelchairs as provided in that part.

(2) For other vehicles transporting individuals who use wheelchairs, the entity shall provide and use a securement system to ensure that the wheelchair remains within the securement area.”

(ADA FTA C 4710.1, 2015, page 33)

(3) http://www.fta.dot.gov/12325_15055.html

Securement**May a transit operator require that wheelchairs be secured in buses and vans?**

Yes, if the transit operator has established such a policy, and the vehicle is required to be equipped with a securement system by 49 CFR Part 38. Section 37.165(c)(3) of the DOT ADA regulations allows a transit operator to establish a policy that requires all riders to have their wheelchairs secured while aboard a transit bus or van. Therefore, the operator may decline to provide service to a rider who refuses to allow his or her wheelchair to be secured.

Alternatively, transit operators may adopt a policy that allows wheelchairs to ride unsecured. If the rider wishes his or her wheelchair to be secured, however, the operator’s personnel must provide the requested assistance.

The regulations do not require that rail vehicles be equipped with securement devices; if securement devices are nonetheless provided, their use is optional and at the rider’s discretion.

May a transit operator deny boarding to a rider whose wheelchair is difficult to secure?

No. If the transit operator has a policy that requires securement, or if a rider asks that the wheelchair be secured, Section 37.165(f) of the DOT ADA regulations requires transit personnel to use their best efforts to secure the device. Section 37.165(d) states that transit operators cannot refuse to accommodate a wheelchair because the device cannot be secured to the driver’s satisfaction. Given the diversity of wheelchairs, transit operators should consult with the owner of the wheelchair to determine the best means of securement.

Documentation Required

Yes. Include available documentation.

Question 3.04
Will the agency still transport if the driver is not able to secure wheelchair?
Acceptable Response
Yes. The agency is required to still provide transportation to a willing rider who is unable to be secured in a vehicle.
<u>Example Policy:</u> Drivers will assist in securing wheelchairs or mobility devices but cannot deny passengers whose device cannot be secured and will not require a passenger to transfer to a seat.
FTA Guidance or Regulation
“Under § 37.165(c), a transit agency may establish a policy requiring riders to allow drivers to secure their wheelchairs on buses and vans. If an agency establishes a mandatory securement policy, then the agency is permitted to deny service to an individual who refuses to allow his or her wheelchair to be secured. (Conversely, an agency may have a policy allowing riders to remain unsecured, provided that if a rider wishes to have his or her wheelchair secured, agency personnel provide assistance with the securement.)” (ADA FTA C 4710.1, 2015, page 34)
Documentation Required
Yes. Include available documentation.

Question 3.05
Is there a formal policy on accepting “service animals” aboard vehicles and in facilities?
Acceptable Response
Yes. This should be described in the rider handbook.
<u>Example Policy:</u> Service animals will be transported with their owners without restriction or extra cost. Service animals must be supervised and the owner/handler must retain full control of the animal at all times. Owners/handlers are responsible for cleanup of any waste or litter caused by the service animal and is liable for any damages the animals cause. Drivers and dispatchers will accept the rider’s statement that the passenger’s animal is a service animal.
FTA Guidance Required
-“Transportation services providers must have a Title VI plan and policies in place that address procedures for special needs, service animals and the complaint or grievance process.” (KDOT Policy Manual – Office of Public Transportation, 2018, page 29)
- “Transportation service policies must include: seat belt usage, passenger assistance, service animals (animals must be able to be trained to assist their handler in daily activities, but no documentation is required from the handler), wheel chair assistance, passenger rules, passenger incidents reporting, medical or other emergencies, fares or donations, pre- and post- trip inspections, vehicle maintenance, the securement of loose articles in the van (medical equipment, oxygen tanks, walkers, etc.)” (KDOT Policy Manual – Office of Public Transportation, 2018, page 23)
-A ‘service animal’ is defined as “any guide dog, signal dog, or other animal individually trained to work or perform tasks for an individual with a disability, including, but not limited to, guiding individuals with impaired vision, alerting individuals with impaired hearing to intruders or sounds, providing minimal protection or rescue work, pulling a wheelchair, or fetching dropped items. (Department of Transportation (DOT) Americans with Disabilities Act (ADA) regulations at 49 C.F.R. Section 37.3)
Documentation Required
Yes. Include available documentation.

Question 3.06 How does the agency determine if an animal is a “service animal?”
Acceptable Response Responses vary between agencies. However, in the agency’s policy, they are not allowed to require paperwork for the service animal. The only two questions they are allowed to ask are in the guidance below. <u>Example Policy:</u> Service animals will be transported with their owners without restriction or extra cost. Service animals must be supervised and the owner/handler must retain full control of the animal at all times. Owners/handlers are responsible for cleanup of any waste or litter caused by the service animal and is liable for any damages the animals cause. Drivers and dispatchers will accept the rider’s statement that the passenger’s animal is a service animal.
FTA Guidance or Regulation “Transit agencies cannot have a policy requiring riders to provide documentation for their service animal before boarding a bus or train or entering a facility, but personnel may ask riders two questions: (1) is the animal a service animal required because of a disability? and (2) what work or task has the animal been trained to perform?” (ADA FTA C 4710.1, 2015, page 37)
Documentation Required Yes. Include available documentation.

Question 3.07
Can a person not using a wheelchair request to ride a wheelchair lift?
Acceptable Response
Yes. Some riders may be unable to use the stairs up to the bus. So, an alternative must be given. <u>Example Policy</u> : Anyone may use the accessible ramp to enter or exit the vehicle.
FTA Guidance or Regulation
<p>“The entity shall permit individuals with disabilities who do not use wheelchairs, including standees, to use a vehicle’s lift or ramp to enter the vehicle. People using canes or walkers and other standees with disabilities who do not use wheelchairs but have difficulty using steps must also be permitted to use the lift on request. If a rider asks to use a lift or ramp, the transit personnel should deploy the lift or ramp without inquiring about the individual’s disability. Provided, that an entity is not required to permit such individuals to use a lift Model 141 manufactured by EEC, Inc. If the entity chooses not to allow such individuals to use such a lift, it shall clearly notify consumers of this fact by signage on the exterior of the vehicle (adjacent to and of equivalent size with the accessibility symbol)” (§ 37.165(g)).</p> <p>The requirement to allow standees on lifts applies to riders who use canes, crutches, walkers, or other assistive devices. It also includes riders with disabilities who do not use any type of assistive device or who may not have a visible or apparent disability. The Part 38 vehicle specifications require handrails on lifts to facilitate use of lifts by standees. (ADA FTA C 4710.1, 2015, page 35)</p> <p>You are still required to take on passengers on the lift whether or not they are standing, in a chair, walker, etc., but you are welcome to keep a collapsible wheelchair on the vehicle and ASK them if they’d prefer to board sitting down, and then transfer to a seat. If they still turn down the offer to sit, you MUST still let them ride the lift without being seated in a chair. (KDOT staff_2017-01-13)</p>
Documentation Required
Yes. Include available documentation.

Question 3.08
Do you allow persons to carry compressed oxygen canisters and respirators aboard your vehicles?
Acceptable Response
Yes. The agency’s policy must indicate the acceptance of all medical equipment on the vehicle. <u>Example Policy</u> : All medical equipment, such as wheelchairs, walkers, respirators, portable oxygen tanks must be properly secured by the driver during transit in all vehicles.
FTA Guidance or Regulation
<p>“Transit System Policies: All transit agencies, regardless of the KDOT funding source, must have policies adopted and implemented that define the functions of their transit system. Transportation service policies must include: seat belt usage, passenger assistance, service animals (animals must be able to be trained to assist their handler in daily activities, but no documentation I required from the handler), wheel chair assistance, passenger rules, passenger incidents reporting, medical or other emergencies, fares or donations, pre- and post- trip inspections, vehicle maintenance, the securement of loose articles in the van (medical equipment, <u>oxygen tanks</u>, walkers, etc.)” (KDOT Policy Manual – Office of Public Transportation, 2018, page 23)</p>
Documentation Required
Yes. Include available documentation.

Question 3.09
Does the agency have a “rider’s handbook” describing the agency’s policies and procedures relating to the ADA paratransit services?
Acceptable Response
Yes.
FTA Guidance or Regulation
“The entity shall make available to individuals with disabilities adequate information concerning transportation services. This obligation includes making adequate communications capacity available, through accessible formats and technology, to enable users to obtain information and schedule service” (§ 37.167(f)). (ADA FTA C 4710.1, 2015, page 38)
Documentation Required
Yes. Provide a copy of the “Handbook” (before site visit)

Question 3.10
Are the agency’s buildings accessible to all persons with disabilities?
Acceptable Response
Yes. Reviewer should confirm wheelchair access to agency office is available.
FTA Guidance or Regulation
As defined in 49 CFR § 37.3, a facility is “all or any portion of buildings, structures, sites, complexes, equipment, roads, walks, passageways, parking lots, or other real or personal property, including the site where the building, property, structure, or equipment is located.” (ADA FTA C 4710.1, 2015, page 47)
Documentation Required
N/A

Question 3.11
Does the agency use the term ‘common wheelchair’ anywhere in the agency’s documents, websites or advertising materials?
Acceptable Response
The agency should confirm all agency materials do not include the term ‘common wheelchair’.
Guidance or Regulation
“The term ‘common wheelchair’ is no longer to be used in any documents, web pages, or other items pertaining to public transit and paratransit programs and must be removed from all agency documents, websites, and advertising materials.” (KDOT Policy Manual – Office of Public Transportation, 2018, page 32)
Documentation Required
N/A

Question 3.12 Does the agency have a policy regarding the use of bicycles in the vehicle?
Acceptable Response The agency should have a policy concerning whether bicycles are permitted aboard their vehicles. <u>Example Policy:</u> If an occupant is required to bring personal items in the vehicle, they will be responsible for securing the safekeeping of this item at all times. Bicycles may be transported in the cargo area.
Guidance or Regulation "Bike racks, whether installed at the time of vehicle order or added later, are eligible expenses in all our programs. Vehicles that have bike racks should include regular inspection and maintenance of the racks to ensure proper working order. For vehicles that do not have bike racks, bicycle may or may not be permitted inside the vehicle – this is up to the agency's discretion and must be noted both in policy as well as in the rider's handbook that each agency must develop." (KDOT Policy Manual – Office of Public Transportation, 2018, page 54)
Documentation Required Yes. Include available documentation.

SECTION 4: Maintenance

Question 4.01
Are there maintenance records for each vehicle available for review?
Acceptable Response
Yes. They should be recorded in a KDOT issued log book or in a binder specific to the vehicle.
FTA Guidance or Regulation
“All transit services providers are required to document maintenance and repairs made to the vehicle in the KDOT vehicle maintenance book (KDOT Form 314: Equipment Manual). Maintenance books are mailed to each provider when a new vehicle is delivered as a part of the delivery package. Maintenance books must be available for review and use by the KDOT District/Area Inspector when they complete the annual vehicle inspection. KDOT will monitor all vehicle maintenance and will review all documentation at the triennial review.” (KDOT Policy Manual – Office of Public Transportation, 2018, page 53)
Documentation Required
Yes. Include available documentation.

Question 4.02
Are the vehicle records identified by the VIN number?
Acceptable Response
Yes. Confirm the vin number is available in the records.
FTA Guidance or Regulation
Same guidance for Question 4.01. However, the VIN number requirement is not stated.
Documentation Required
Yes. Include available documentation.

Question 4.03
Are the titles for federally-funded vehicles in the name of the sub-recipient/applicant?
Acceptable Response
Yes. This will be confirmed prior to the site visit.
FTA Guidance or Regulation
Per KDOT.
Documentation Required
Yes. Copies of titles or registrations (before site visit)

Question 4.04 Does the agency have written maintenance plans for federally-funded vehicles so the maintenance history is permanently recorded?
Acceptable Response Yes. There should be system to keep track of the maintenance history. Acceptable preventative maintenance plans include copies from the maintenance section of the vehicle owners manual, separately written documents or spreadsheets identifying preventative maintenance, or reports from commercially-available vehicle maintenance software that some agencies may use. Regardless of what form they take, the maintenance schedule in the plans should conform to the manufacturers recommended maintenance schedule specific to the year, make, and model of each vehicle.
FTA Guidance or Regulation The grantee is required to have a written vehicle maintenance plan and facility/equipment maintenance plan. These plans should describe a system of periodic inspections and preventative maintenance to be performed annually and submitted to KDOT as a part of the agency's grant application. (KDOT Policy Manual – Office of Public Transportation, 2018, page 33)
Documentation Required Yes. Include available documentation.

<p>Question 4.05 Do the preventative maintenance schedules in the plan meet the minimums required by the manufacturer or supplier?</p>
<p>Acceptable Response Yes. There should be proof the manufacturer’s requirements are coordinated with the maintenance done on the vehicle.</p>
<p>FTA Guidance or Regulation -Transportation service providers are required to follow all OEM (vehicle manufacturer) maintenance requirements. (KDOT Policy Manual – Office of Public Transportation, 2018, page 53) -“All lifts must be properly maintained and scheduled for maintenance according to the lift manufacturer’s requirements. Agencies that have lift equipped vehicles that do not follow lift maintenance requirements will forfeit all KDOT funding if their vehicles are not properly maintained.” (KDOT Policy Manual – Office of Public Transportation, 2018, page 55) - Provide records of the previous eight to ten oil changes for two or three KDOT vehicles. A minimum of 90 percent of the performed oil changes is required to be made according to the manufacturer’s recommended mileage interval. Oil changes should be made no earlier than 500 miles before the manufacturer recommended mileage requirement. (Per KDOT guidance.) - If the user’s manual recommends changing the oil when the light comes on, please include the statement below in the agency’s maintenance plan: “The OEM for this vehicle recommends that the oil is changed when the oil light comes on. To comply with FTA guidance, we have established that the interval between oil changes for this vehicle will be every _____ miles. Should the Oil Change light come on at any time between scheduled oil changes every _____ miles, the vehicle will be checked to see if an additional oil change is necessary, and if it is, we will change the oil. All oil changes should be documented in the maintenance log.” (Per KDOT guidance)</p>
<p>Documentation Required Yes. Include available documentation.</p>

<p>Question 4.06 Is preventative maintenance being completed as scheduled? If not, why?</p>
<p>Acceptable Response Yes.</p>
<p>FTA Guidance or Regulation “The consultants acting on KDOT’s behalf have the authority to inspect the transit vehicle(s), check for all required safety items to be included in the vehicle(s), check the vehicle specific maintenance records of the agency (as well as compare these records to the preventative maintenance policies & procedures) and do a ride along to interview the driver and one or two passenger(s). (KDOT Policy Manual – Office of Public Transportation, 2018, page 71)</p>
<p>Documentation Required Yes. Provide a maintenance plan with a corresponding maintenance record.</p>

Question 4.07
Is any federally-funded equipment under warranty and if so what is the process for recovering warranty claims?
Acceptable Response
The agency should have a plan for recovering warranties.
FTA Guidance or Regulation
“Agencies should check to see if necessary repair/maintenance work is eligible under their vehicle’s warranty before taking it in for service. This is especially true on certain components of the vehicles that we procure, which often have longer warranty coverage periods than are standard. Vehicles provided under KDOT programs are required to meet certain federal and state procurement and safety standards under the guidance of the Federal Transit Administration, the KCTDC, and KDOT.” (KDOT Policy Manual – Office of Public Transportation, 2018, page 54)
Documentation Required
Yes. Provide a written description of the process.

Question 4.08
Is all work required by manufacturer’s warranty provisions being performed? If not, why?
Acceptable Response
Yes.
FTA Guidance or Regulations
“Agencies should check to see if necessary repair/maintenance work is eligible under their vehicle’s warranty before taking it in for service. This is especially true on certain components of the vehicles that we procure, which often have longer warranty coverage periods than are standard. Vehicles provided under KDOT programs are required to meet certain federal and state procurement and safety standards under the guidance of the Federal Transit Administration, the KCTDC, and KDOT.” (KDOT Policy Manual – Office of Public Transportation, 2018, page 54)
Documentation Required
Yes. Include available documentation.

Question 4.09
Are there written records indicating pre-trip, mid-day driver changes, post-trip and weekly inspections are completed?
Acceptable Response
The agency should have official KDOT forms to fill out for all trip inspections. An example of one vehicle's inspections is necessary.
FTA Guidance or Regulation
<p>"An inspection form is required to be completed each day before the vehicle is put into service. Regular inspections help assure the KDOT funded vehicles are safe to operate, being well maintained, and in good condition. The inspection form was recently updated to incorporate pre-trip, mid-day driver changes, post-trip, and weekly inspections. A blank copy is shown on the next two pages. Transit agencies may have developed a more robust inspection for use, which is allowed, so long as the agency's form includes all items that are on the KDOT inspection form."</p> <p>"The inspection form must be signed by the driver completing each phase of the inspection, the mechanic, if repairs are needed, and the driver's supervisor. Inspection forms are to be kept for 90 days, unless associated with an incident/accident, in which case the agency should be stapled to the accident report form(s) and kept on file. Forms will be verified at the triennial on site review." (KDOT Policy Manual – Office of Public Transportation, 2018, page 50)</p>
Documentation Required
Yes. Provide a sample of records for the 3 previous months

Question 4.10
Is there documentation the drivers or mechanics cycle the lifts each day prior to the vehicle being placed in service?
Acceptable Response
Yes. The recording of this activity should be one of the items listed in the pre-trip inspection checklist.
FTA Guidance or Regulation
<p>"An inspection form is required to be completed each day before the vehicle is put into service. Regular inspections help assure the KDOT funded vehicles are safe to operate, being well maintained, and in good condition. The inspection form was recently updated to incorporate pre-trip, mid-day driver changes, post-trip, and weekly inspections." (KDOT Policy Manual – Office of Public Transportation, 2018, page 50)</p>
Documentation Required
Yes. Include available documentation.

Question 4.11 Have all drivers been trained to use the wheelchair lifts/ramps and the wheelchair securement system(s)?
Acceptable Response Yes. The agency should have a training log in place tracking each driver’s training history. Details for each training should include the driver name, training date, training renewal/expiration date, and certification type.
FTA Guidance or Regulation “Driver’s Training: Driver’s Training is held throughout the year and is offered at various locations statewide. Training topics include such issues as defensive driving, conducting pre-trip inspections, transporting passengers with special needs, how to deal with difficult passengers, safety & security, emergency planning etc. All drivers, including volunteers or other agency staff, that operate vehicles funded by the KDOT Office of Public Transportation programs must attend the approved RTAP Driver’s Training every other year.” (KDOT Policy Manual – Office of Public Transportation, 2018, page 41)
Documentation Required Yes. Include available documentation.

Question 4.12 Does the agency have vehicles which are currently out of service due to mechanical problems or damage? (If no, go to Question 4.14)
Acceptable Response Yes or No.
FTA Guidance or Regulation Per KDOT.
Documentation Required N/A

Question 4.13 How long have they been out of service?
Acceptable Response Responses vary between agencies.
FTA Guidance or Regulation Per KDOT.
Documentation Required N/A

Question 4.14
When an ADA vehicle is out of service how do you provide ADA service? How long have they been out of service?
Acceptable Response
Responses vary between agencies.
FTA Guidance or Regulation
This question is fairly similar to Section 3, Question 2. “For example, for sub-recipients purchasing inaccessible vehicles with § 5310 funds, this means being prepared to demonstrate they are providing equivalent levels of service to individuals with disabilities, including those who use wheelchairs. If an award to a sub-recipient that provides closed-door service to its own clientele includes inaccessible vehicles, the sub-recipient must have a process in place to ensure that equivalent service is provided as needed, either by the private nonprofit that alters its vehicle fleet composition, or through a third-party contract or other arrangement with another sub-recipient or contractor.” (ADA FTA C 4710.1, 2015, page 17)
Documentation Required
N/A

Question 4.15
Does the agency have an annual record of the miles traveled for federally-funded vehicles? If the agency has any federally-funded vehicle(s) that traveled less than 2,500 miles last year, provide a utilization plan for the vehicle(s).
Acceptable Response
Responses vary between agencies. All vehicles must travel at least 2,500 miles.
FTA Guidance or Regulation
The minimum use of a transit vehicle is 2,500 miles per year. KDOT will monitor the usage of vehicles. If the vehicle is not being used to meet the required KDOT standards, KDOT will contact the agency requiring the establishment a utilization plan. If a utilization plan cannot be established the useful life formula for the transfer of the vehicle will be completed by KDOT and the provider will be notified the vehicle will be transferred. If the transfer of the vehicle is required, the agency that is forfeiting the vehicle must put in writing a list of the items on the van that are damaged or need repaired and provide that list to KDOT. (KDOT Policy Manual – Office of Public Transportation, 2018, page 26)
Documentation Required
Yes. Include available documentation. (before site visit)

Question 4.16
Is the agency aware of how to dispose of a federally-funded vehicle?
Acceptable Response
Responses vary between agencies. If they are not aware of how to dispose of the vehicle, they can contact KDOT when they are ready to dispose of the vehicle.
FTA Guidance or Regulation
Per KDOT.
Documentation
N/A

Question 4.17
Where does the agency store federally-funded vehicles? What amount of storage costs were requested for the most recent fiscal year?
Acceptable Response
The agency should verbally confirm the storage location of their KDOT vehicle fleet. If the agency has requested storage costs for reimbursement, those should be documented in the financial ledger.
Guidance or Regulation
“Vehicle storage locations will be verified at the triennial on-site review. Information on the location of the storage facility and the amount of storage costs claimed will be included in the verification. Vehicles may not be parked at private residences for extended periods of time (overnight parking or during lunches and breaks).” (KDOT Policy Manual – Office of Public Transportation, 2018, page 19)
Documentation
Yes. Include available documentation for any requested storage costs.

SECTION 5: Safety and Security

Question 5.01
Does the agency have a written safety plan for the agency?
Acceptable Response
If they do not have a safety plan, this will not be a finding. The agency will need to coordinate with KDOT once the FTA finalizes the National Public Transportation Safety Plan.
FTA Guidance or Regulation
The FTA Transit Bus Safety & Security Program is a program for transit providers to access for guidance in developing safety and security plans for their programs. The website can be accessed by going to http://bussafety.fta.dot.gov for further guidance on emergency planning. (KDOT Policy Manual – Office of Public Transportation, 2018, page 65)
Documentation Required
Yes. Include available documentation.

Question 5.02
Does the agency have a written security and emergency management plan? (If no, skip Question 3.)
Acceptable Response
The agency must have the proper emergency contact and vehicle information available. This information is included in the grant application. More guidance can be given if needed.
FTA Guidance or Regulation
“Agencies receiving 5310, 5311 and/or 5339 funding are required to complete the after-hours contact information form for KDOT...In the case of a declared national, state or local emergency this information will be used to contact service providers that may be called out to evacuate residents of a disaster area.” (KDOT Policy Manual – Office of Public Transportation, 2018, page 65)
Documentation Required
Yes. Provide a copy of the emergency contact information.

Question 5.03
Is the emergency management plan coordinated with local agencies?
Acceptable Response
Yes. Confirm the information has been forwarded to local agencies.
FTA Guidance or Regulation
“Agencies receiving 5310, 5311 and/or 5339 funding are required to complete the afterhours contact information form for KDOT...In the case of a declared national, state or local emergency this information will be used to contact service providers that may be called out to evacuate residents of a disaster area.” (KDOT Policy Manual – Office of Public Transportation, 2018, page 65)
Documentation Required
N/A

Question 5.04
Does the agency currently have any child safety seats available for the KDOT vehicles? If so, how many?
Acceptable Response
The agency must confirm they have the proper number of child safety seats and booster seats. Refer to the prescribed ratio in the guidance below.
FTA Guidance or Regulation
<p>“The KDOT guidelines for child safety and booster seats are that for every five (5) vehicles in the fleet - one child safety seat and one booster seat will be required, unless the vehicle being operated has built-in child safety seats. KDOT will verify that the transit agency has child safety seats and booster seats at the triennial on-site review.” (KDOT Policy Manual – Office of Public Transportation, 2018, page 31)</p> <p>Ready access to child safety seats are required for all KDOT program participants. While we understand their point of view, we are trying to ensure that our statewide fleet can be called into service in case of disaster/emergency as well. Additionally, 5310 covers Elderly & Persons with Disabilities, regardless of their age. Please request one of two things to fulfill this program requirement: Either they have the seats themselves, or they have a written MOU with another agency in their area (County, YMCA, etc.) to have access to child seats if the need should arise. (KDOT staff_2017-01-13)</p> <p>MOU for sharing child booster / safety seats cannot be with another 5311 or 5310 agency (per KDOT staff).</p>
Documentation Required
N/A