



**MONTANA DEPARTMENT OF TRANSPORTATION**

**SECTION 5310 COMPLIANCE AND GOOD PRACTICES  
REVIEW**

**Grantee:** \_\_\_\_\_

**Reviewer(s):** \_\_\_\_\_

**Desk Review Date:** \_\_\_\_\_

**Site Visit Date:** \_\_\_\_\_



**MONTANA DEPARTMENT OF TRANSPORTATION  
SECTION 5310 COMPLIANCE AND GOOD PRACTICES REVIEW**

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# OVERVIEW

The Montana Department of Transportation (MDT) plans to conduct biennial compliance reviews of Section 5310 grantees. MDT conducts the reviews to ensure that grantees meet the conditions of receipt of Federal Transit Administration (FTA) assistance. MDT will conduct the reviews as follows:

1. MDT will review materials and reports on file in its office and will complete several sections of the workbook. MDT will note findings from the last site visit and agreed upon corrective actions. MDT will email the partially completed workbook to the grantee.
2. The grantee will review the information entered by MDT, provide updates to the material listed, and answer as many questions as possible. After completing the workbook, the grantee will email it to MDT.
3. MDT will review the grantee's responses and will follow up on the responses during the site visit, which will last no more than one day. During the site visit, MDT will follow up on corrective actions taken for findings from the last review, inspect all vehicles, and inspect maintenance records for a sample of vehicles.

After emailing the workbook with your responses, please mail the following materials to X at MDT:

- An organization chart for the whole organization and the transportation program
- Copy of bus operators' manual/transportation service policies, transportation safety policies and procedures, transportation emergency procedures, and transportation training program, if written and if updated since X
- Complaint procedures, if written and if updated since X

The site visit presents an opportunity for MDT to observe your service and operations first hand and provides you with an opportunity to have any questions that you may have answered. We appreciate your cooperation. Thank you.

MDT

# ADMINISTRATION AND MANAGEMENT

## MANAGERIAL CAPABILITY

Grantees must be able have the managerial capability to implement the project and comply with federal and state requirements. To demonstrate managerial capability, grantees must have adequate number of staff to implement the project; management staff with the requisite skills, education, training, and experience; adequate documentation of key policies; and the ability to submit timely, complete, and accurate quarterly reports.

|  |  |
|--|--|
| 1. Who is responsible for the day-to-day management of the transportation program?   |  |
| 2. Please describe the qualifications and experience of transportation program management and supervisory staff. Are the staff qualified by reason of training, education, and experience?<br><br>Qualifications of management and supervisory staff are a key indicator of management and technical capability. |  |
| 3. Please describe your staffing and the responsibilities of key staff. Does the number of staff appear appropriate for the number and complexity of tasks and the size of the program?<br><br>MDT requires that grantees have sufficient staff to implement the program.  |  |
| 4. Do you have written procedures that address the following aspects of transportation program management:<br><br>The level of documentation of procedures is a key indicator of management and technical capability.  |  |
| a) Maintenance plan (required)   |  |
| b) Emergency procedures (required)   |  |
| c) Operators' manual/service policy  |  |
| d) Safety policies and procedures  |  |
| e) Training program  |  |
| f) Complaint resolution procedures   |  |

|   |                             |                               |
|---|-----------------------------|-------------------------------|
| <p>5. Who is responsible for purchasing buses and vans?<br/>Is there a systematic process for determining the number and size of vehicles for the fleet?<br/>Are decisions for expanding the fleet based on ridership projections? If yes, how are the projections developed?</p> |                             |                               |
| <p>6. Reviewer, please enter the grantee's rating for the submission of quarterly reports.<br/>MDT requires that grantees submit complete, accurate, and timely quarterly reports.</p>  |                             |                               |
| <p>7. Please enter the following information for the past 4 quarterly reports.</p>  |                             |                               |
| <p><b>Quarter</b></p>   | <p><b>Date Received</b></p> | <p><b>Comments/Issues</b></p> |
|   |                             |                               |
|   |                             |                               |
|   |                             |                               |
|   |                             |                               |
| <p>8. Who is responsible for preparing and submitting the quarterly reports?</p>  |                             |                               |
| <p>9. Are reports submitted on time? If no, what are the reasons for the delay?</p>   |                             |                               |
| <p>10. Reviewer, discuss any comments or issues with the reports.<br/>Grantee, please respond to the reviewer's comments.</p>   |                             |                               |

## FINANCIAL CAPACITY

Grantees must have sufficient local resources to provide the required match and carry out the proposed project.

|   |  |
|---|--|
| <p>1. What are the sources of non-FTA funding for capital expenses?<br/>What are the sources of funding for operating the buses?<br/>Are they sufficient to implement the project and maintain project equipment?</p> |  |
|---|--|

## SATISFACTORY CONTINUING CONTROL

Grantees must use FTA-funded equipment and facilities to provide transportation to individuals. Grantees must maintain comprehensive and collision insurance on FTA-funded equipment and must submit certifications of insurance annually. Grantees must submit reports of vehicle use on each FTA-funded vehicle quarterly. Grantees must obtain prior written approval from MDT before selling, leasing, or disposing of vehicles.

| Vehicle* | Date of Last Quarterly Grant Vehicle Report* | Odometer reading from last quarterly report* | Date of last certificate of insurance* | Comments Concerning Use* |
|----------|--|--|--|--------------------------|
|          |  |  |  |                          |
|          |  |  |  |                          |
|          |  |  |  |                          |
|          |  |  |  |                          |
|          |  |  |  |                          |
|          |  |  |  |                          |
|          |  |  |  |                          |

\*To be completed by reviewer prior to sending the workbook to the grantee after reviewing the quarterly vehicle reports for the last year.

|   |  |
|---|--|
| <p>1. Have you provided MDT with an updated proof of insurance on each vehicle?<br/>Do you have comprehensive and collision insurance coverage on FTA-funded vehicles?<br/>If self-insured, how is the self-insurance funded?<br/>MDT requires that grantees maintain comprehensive and collision coverage on FTA-funded vehicles and provide proof of insurance annually.</p>                          |  |
| <p>2. Have you sold or disposed of any FTA-funded vehicles in the past year? If yes: Please list the vehicles.<br/>Did you obtain approval from MDT?<br/>MDT requires that grantees obtain approval before selling or disposing of vehicles on which it holds a lien.<br/>[Reviewers, please list the vehicles for which the grantee requested approval for disposition since the last site visit.]</p> |  |

| <p>3. Are leases attached to FTA-funded assets?<br/>If yes, did MDT approve the leases in writing?<br/>MDT must approve all leases of FTA-funded vehicles in writing.<br/>[Reviewers, please list the vehicles for which the grantee asked for approval since the last site visit.]</p>                          |            |  |  |  |                |  |  |  |       |
|--|------------|--|--|--|----------------|--|--|--|-------|
| <p>4. What procedures and practices are used to prevent loss, damage, or theft of FTA-funded vehicles and equipment?<br/>Examples of procedures include insurance, locks on doors, fencing, lighting, inventory and tagging of all equipment, and annual inventories that are reconciled to inventory lists.</p> |            |  |  |  |                |  |  |  |       |
| <p>5. Enter the ridership data from the last 4 quarterly reports in the table below. Do the ridership data indicate that the grantee is using the vehicles to their full capacity?</p>   |            |  |  |  |                |  |  |  |       |
| Category   | Contracted |  |  |  | Non-Contracted |  |  |  | Total |
| 60 +   |            |  |  |  |                |  |  |  |       |
| < 60   |            |  |  |  |                |  |  |  |       |
| Disabled   |            |  |  |  |                |  |  |  |       |
| Total  |            |  |  |  |                |  |  |  |       |

## EQUAL EMPLOYMENT OPPORTUNITY (EEO)

Grantees may not discriminate against any employee or applicant for employment because of race, color, creed, national origin, sex, age, or disability. Grantees must take affirmative action to ensure that applicants are employed and that employees are treated during employment without regard to race, color, creed, national origin, sex, age, or disability. Grantees must post in conspicuous places and make available to employees and applicants for employment notices setting forth an EEO policy. The grantee's chief executive officer should designate an EEO officer and adequate staff to administer the program. The EEO officer should be an executive that reports directly to the CEO on EEO matters.

|  |  |
|--|--|
| <p>1. Who is responsible for ensuring that EEO obligations are fulfilled?<br/>To whom does this individual report for EEO matters?<br/>The CEO should designate an EEO officer and adequate staff to administer the program. The EEO officer should be an executive that reports directly to the CEO on EEO matters.</p> |  |
| <p>2. Have you posted an EEO statement in a conspicuous place?<br/>An EEO statement must be posted in a conspicuous place where employers and applicants will see it.</p>  |  |
| <p>3. Do your job postings have an EEO statement?<br/>Job postings should include an EEO statement.</p>  |  |
| <p>4. Is an EEO policy included in your personnel policies and/or employee handbook?<br/>An EEO policy should be included in personnel policies and/or employee handbook.</p>  |  |
| <p>5. Are EEO statements included on your job applications and employment notices?<br/>Job applications and employment notices should include an EEO statement.</p>  |  |
| <p>6. If requested, were reasonable accommodations made for hiring a person with disabilities in accordance with Title III of the ADA?</p>   |  |

|   |  |
|---|--|
| <p>7. Were any EEO complaints received since the last site visit? If yes:<br/>Describe the complaint and how it was resolved.<br/>What is the process for handling and resolving such complaints?</p> |  |
|---|--|

# OPERATIONS AND SERVICE PROVISION

## TRANSPORTATION

Grantees must monitor service to ensure that drivers follow policy and procedures and provide quality service. Grantees must have a training program for drivers and must track training that drivers have received. Grantees should have a written operators' policy and procedures manual.

|   |  |
|---|--|
| <p>1. Do the procedures for monitoring daily operations ensure that drivers follow policy and procedures and provide quality and courteous service?<br/>Grantees must monitor service to ensure that drivers follow policy and procedures and provide quality service.</p>  |  |
| <p>2. Does the training provided to operators/drivers address:<br/>a) defensive driving</p>   |  |
| <p>b) passenger assistance and safety</p>   |  |
| <p>c) operation of lifts or other accessibility features</p>  |  |
| <p>d) correct use of securement devices</p>   |  |
| <p>e) agency policies</p>   |  |
| <p>f) how to complete driver paperwork</p>  |  |
| <p>g) substance abuse awareness training (if operate vehicles that require a CDL)?</p>  |  |
| <p>3. Are files maintained that document when training was received and when refresher training is needed?<br/>Grantees must track training received by operator.</p>   |  |
| <p>4. Is there a written service policy or operators' manual?<br/>Does the policy/manual accurately and completely document current policies governing the delivery of service?<br/>Grantees should have a service policy or operators' manual that documents policies and procedures for drivers.<br/>[Reviewer, please note the topics the manual addresses.]</p> |  |
| <p>5. Is the assignment of drivers and vehicles appropriate for service demands, equipment, training and other relevant factors?</p>  |  |



## MAINTENANCE

Grantees must have the management capability to maintain FTA-funded equipment and facilities. Grantees must have a written maintenance plan. Grantees must maintain project equipment and facilities at a high level of cleanliness, safety, and mechanical soundness. Grantees must maintain all accessibility features and equipment in operating condition.

Grantees must have a pre-trip inspection program that addresses vehicle condition, appearance, cleanliness, and safety. Deficiencies noted in a pre-trip inspection must be repaired in a timely manner and properly reviewed by management.

Grantees must maintain a file on each FTA-funded vehicle that contains daily logs, pre-trip inspection checklists, and repair records. Grantees must follow MDT's preventive maintenance program unless MDT has approved an alternative program. Grantees must use MDT provided forms unless MDT has approved alternative forms. Grantees that lease FTA-funded vehicles must require the lessee to adhere to MDT's maintenance standards.

|   |  |
|---|--|
| 1. Please use MDT's inspection sheet to inspect all vehicles. Note deficiencies on the sheet. Compare the completed sheet to the sheets that the grantee has on file. Note whether the grantee has noted the same items.  |  |
| 2. Review the files for three vehicles. Note deficiencies for each file inspected.  |  |
| 3. Who is responsible for maintenance?<br>Is the person by reason of education, training, and experience qualified for the responsibility?  |  |
| 4. Please describe the preventive maintenance program. Note whether the grantee follows the MDT program or follows a program it developed.<br>Is the maintenance plan written?<br>[Reviewer, refer to the copy of the maintenance plan submitted with the application.] |  |
| 5. Do preventive maintenance schedules for each type of vehicle in the fleet meet the manufacturer's minimum requirements for severe operations?<br>Preventive maintenance schedules must meet manufacturers' minimum requirements for severe operations.               |  |

|  |  |
|--|--|
| <p>6. Is a preventive maintenance program in place for lifts and other accessibility features such as ramps, public announcement systems, and annunciators?<br/>Grantees must maintain all accessibility features and equipment in operating condition.</p>  |  |
| <p>7. What procedures are used to track when preventive maintenance inspections are due and to schedule preventive maintenance inspections?<br/>Grantees must have procedures to track when preventive maintenance inspections are due and to schedule preventive maintenance in a timely manner.</p>  |  |
| <p>8. Reviewer, review the files for the 3 vehicles reviewed in question 2. Note the date and mileage of all preventive maintenance inspections since the last site visit using the attached form.<br/>Does the review of the maintenance records indicate that at least 80 percent of the inspections are performed on time?<br/>Please allow a 10 percent or 500-mile variance, whichever is greater, when deciding whether an inspection was performed on time.</p> |  |
| <p>9. Are pre-trip inspections conducted prior to placing a vehicle in service?<br/>Pre-trip inspections must be conducted prior to placing a vehicle in service.</p>  |  |
| <p>10. Is the MDT pre-trip inspection form used?<br/>If no, does the pre-trip inspection address safety, vehicle operation, appearance, cleanliness, and passenger comfort?<br/>The pre-trip inspection must address safety, vehicle operation, appearance, cleanliness, and passenger comfort.</p>  |  |
| <p>11. Are deficiencies noted in pre-trip inspections repaired in a timely manner and properly reviewed by management?<br/>Deficiencies noted in pre-trip inspection must be repaired in a timely manner and properly reviewed by management.</p>  |  |

|   |  |
|---|--|
| <p>12. Does the pre-trip inspection ensure that all items, such as boxes with bi-directional reflective triangles and gallons of washer fluid, are secured to the vehicle?<br/>Safety and other equipment must be secured so that they are not loose to hurt a passenger.</p>                   |  |
| <p>13. Does the pre-trip inspection program address lifts and other accessibility features, such as ramps and tie-downs?</p>  |  |
| <p>14. Are FTA-funded vehicles leased to providers? If yes:<br/>Does the lease agreement require the lessee to adhere to MDT's maintenance standards?<br/>MDT requires grantees that lease FTA-funded vehicles to providers to require the lessee to adhere to MDT's maintenance standards.</p> |  |
| <p>The following questions address good maintenance practices.</p>  |  |
| <p>15. Are work orders or histories maintained that document the work performed, parts used, time spent, mileage, and date?</p>   |  |
| <p>16. Has a maintenance quality control or assurance program been implemented to verify the execution and quality of repairs, examine the quality of new and used parts used in repairs, and ensure that repairs are fully documented?</p>   |  |
| <p>17. Is there a system for identifying and pursuing warranty claims effectively and promptly to conclusion?</p>   |  |
| <p>18. Is there a system for responding to recalls?</p>   |  |
| <p>19. Is the preventive maintenance program reviewed for costs and effectiveness?</p>  |  |
| <p>20. Are maintenance histories for the fleet reviewed to uncover trends or problems?</p>  |  |
| <p>21. Are there indicators of repetitive occurrences of a particular type of problem in any one make of rolling stock?</p>   |  |
| <p>22. Are there repetitive occurrences (parts failures, road calls, others) of a particular type of failure fleetwide?</p>   |  |
| <p>23. Is there a system to monitor and evaluate vehicle energy consumption?</p>  |  |

## VEHICLE FILE REVIEW SHEET

Grantee: \_\_\_\_\_

Vehicle: \_\_\_\_\_

Date File Inspected: \_\_\_\_\_

Reviewer: \_\_\_\_\_

| Question  | Yes | No |
|---|-----|----|
| Are the files in chronological order?   |     |    |
| Do the files contain the MDT daily log?   |     |    |
| Do the files contain the MDT-provided pre-trip inspection checklist?                              |     |    |
| Are they signed and dated?  |     |    |
| Do the files contain the MDT-provided vehicle maintenance record?                                 |     |    |
| For lift-equipped vehicles, do the files contain the daily pre-trip wheelchair lift safety check? |     |    |
| If the grantee maintains the vehicles in-house, are preventive maintenance checklists:            |     |    |
| Completed?  |     |    |
| Signed?   |     |    |
| Dated?  |     |    |
| Do the work orders fully document vehicle maintenance?  |     |    |
| Is the date and mileage noted on each work order?   |     |    |



## SAFETY

Grantees must document that drivers have a valid operator's license, have a safe driving record, and have been trained in first aid. All safety devices must be maintained in operating condition. All vehicles must be outfitted with a blood-borne pathogens kit, first-aid kit, fire extinguisher, bi-directional reflective triangles, and web cutters. Drivers and passengers must wear seat belts. Smoking is prohibited on all vehicles. Drivers must focus on driving and limit distractions when vehicles are in motion.

|   |  |
|---|--|
| 1. Is documentation maintained which verifies that all drivers of vehicles (owned, leased, loaned) have:  |  |
| a) A valid, appropriate vehicle operator's license (and current US DOT physical if driver is a CDL holder)  |  |
| b) A safe driving record acceptable for insurance coverage  |  |
| c) Completed an American Red Cross, or equivalent, first aid program to handle emergency health situations and accidental injuries  |  |
| 2. Have written procedures been established to assure that project sponsored volunteers, whether reimbursed for expenses or not, driving privately-owned vehicles have:   |  |
| a) A valid appropriate vehicle operator's license (and current DOT physical if driver is a CDL holder)  |  |
| b) A safe driving record  |  |
| c) Personal automobile liability coverage that is appropriate for type of use   |  |
| 3. Does the pre-trip inspection address the following required safety equipment: <ul style="list-style-type: none"> <li>▪ blood-borne pathogen kit</li> <li>▪ first aid kit</li> <li>▪ fire extinguisher (charge and inspection date)</li> <li>▪ bi-directional reflective triangles</li> <li>▪ web cutters</li> </ul> All vehicles must be outfitted with a blood-borne pathogens kit, first-aid kit, fire extinguisher, bi-directional reflective triangles, and web cutters. |  |

|  |  |
|--|--|
| <p>4. Are all required safety devices or systems installed and functioning properly on vehicles?<br/>Are fire extinguishers secure, accessible, of the correct type, and in date? (Sample)<br/>All safety devices must be maintained in operative condition. Fire extinguishers must be secure, accessible, and in date.</p> |  |
| <p>5. Is there a written procedure to handle accidents and medical emergencies?<br/>If yes, are these procedures in each vehicle?<br/>Grantees must have a written procedure for handling accidents and medical emergencies.</p>   |  |
| <p>6. Are passengers required to wear a seat belt?<br/>All passengers must wear seat belts.</p>  |  |
| <p>7. Is smoking prohibited on vehicles?<br/>Smoking is prohibited on all vehicles.</p>  |  |
| <p>8. Are drivers allowed to bring food or drinks on board vehicles?<br/>If yes, are drivers allowed to eat or drink while the bus is in motion?<br/>MDT prohibits operation of a vehicle while eating or drinking.</p>  |  |
| <p>9. Are drivers allowed to use a cell phone while the bus is in motion?<br/>MDT prohibits operation of a vehicles while using a cell phone unless the call is work-related.</p>  |  |
| <p>10. Are all carry on items properly stowed before moving vehicle?<br/>MDT requires that all carry-on items be properly stowed before moving a vehicle.</p>  |  |
| <p>11. What traffic accident analysis and prevention activities are undertaken?</p>  |  |
| <p>12. Is there a safety awards and recognition program?</p>   |  |

## FLEET AND VEHICLE CHARACTERISTICS

The fleet should be appropriate for the type of service, ridership volumes, and scheduling patterns. The vehicle spare ratio must be reasonable for the type of service, the size and age of the fleet, service demand, and current and projected ridership. Grantees should have a fleet replacement plan.

|  |  |
|--|--|
| 1. Are the vehicles used appropriate for the type of service, ridership volumes, and scheduling patterns?  |  |
| 2. Calculate the fleet spare ratio.  |  |
| a) What is the number of vehicles in passenger service?  |  |
| b) What is the number of vehicles required for maximum service?  |  |
| c) What is the number of spare vehicles (a-b)?   |  |
| d) What is the spare ratio (c/b)?  |  |
| 3. How often is the maximum number of vehicles required?   |  |
| 4. Do you anticipate additional ridership in the next 3 years? If yes, by how much?  |  |
| 5. Does the spare ratio appear reasonable given the size and age of the fleet, the frequency of peak service demand, and the projected ridership growth?             |  |
| 6. Have other arrangements been made such as a contract with a taxi company or another agency to deliver service when breakdowns occur or during peak service times? |  |
| 7. What is the average age of the fleet?   |  |
| 8. What is the average mileage of fleet?   |  |
| 9. Is there a fleet replacement plan? If yes, how often is it updated?   |  |

## ADA

Titles II and III of the Americans with Disabilities Act of 1990 provide that no entity shall discriminate against an individual with a disability in connection with the provision of transportation service. The law sets forth specific requirements for vehicle and facility accessibility. Public entities operating a fixed-route system must provide paratransit or other special service that is comparable to the level of service provided to individuals without disabilities who use the fixed-route system.

|  |  |
|--|--|
| <p>1. Have any complaints of discrimination due to disability been received from riders or employees?<br/>If yes, please describe the complaints.<br/>What is the process to resolve the complaints?</p>   |  |
| <p>2. Are facilities accessible?</p>   |  |
| <p>3. If you have non-accessible vehicles in your fleet, how do you ensure that equivalent service is provided?<br/>ADA requires that service to individuals with disabilities be equivalent to the service provided other individuals with respect to response time, fares, geographic service area, hours and days of service, and capacity.</p> |  |
| <p>4. Are system brochures, application forms, rider handbooks, and occasional bulletins available in alternative formats upon request?<br/>ADA requires public information to be made available in alternative formats upon request. Examples of alternative formats include large print, audio tapes, and Braille.</p>                           |  |
| <p>5. Are all accessible vehicles marked with the blue accessibility symbol?<br/>ADA requires that all accessible vehicles be identified with the international accessibility symbol.</p>  |  |
| <p>6. Do all accessible vehicles have a securement system for wheelchairs?<br/>ADA requires that all accessible vehicles have a securement system for wheelchairs.</p>   |  |

|   |  |
|---|--|
| <p>7. What is your policy for providing service if a mobility device cannot be secured?<br/>ADA requires that service must be provided even when a mobility device cannot be secured.</p>   |  |
| <p>8. Do you require wheelchair users to transfer to a seat?<br/>ADA stipulates that operators may request but not require that wheelchair users transfer to a seat.</p>  |  |
| <p>9. Do drivers provide assistance to passengers as necessary and upon request with ramps, lifts, and securement devices?<br/>ADA requires drivers and other personnel to provide this assistance as necessary and upon request.</p> |  |
| <p>10. Do you permit individuals that do not use wheelchairs to use lifts?<br/>ADA requires operators to deploy lifts for standees upon request.</p>  |  |
| <p>11. What is your policy regarding service animals?<br/>ADA requires that operators permit service animals to travel with riders.</p>   |  |
| <p>12. Do you provide service to persons using respirators or portable oxygen?<br/>ADA requires operators to provide service to persons using respirators or portable oxygen.</p>   |  |
| <p>13. What is your policy regarding the time allowed for boarding and alighting?<br/>ADA requires that operators allow adequate time for passengers with disabilities to board and alight vehicles.</p>                              |  |
| <p>14. Do you require drivers to make use of all available accessibility equipment?<br/>ADA requires that operators make use of all available accessibility equipment when needed.</p>  |  |
| <p>15. How are policies governing providing service to passengers covered under the ADA conveyed to drivers?</p>  |  |

|   |  |
|---|--|
| <p>16. Are drivers trained in passenger assistance and sensitivity?<br/>How soon after being hired does the training occur?<br/>ADA requires that drivers receive training in passenger assistance and sensitivity?</p> |  |
| <p>17. Are drivers trained in use of accessibility equipment?<br/>How soon after being hired does the training occur?<br/>ADA requires that drivers receive training in the use of the accessibility equipment.</p>     |  |
| <p>18. How do you monitor drivers to ensure that they comply with ADA requirements?<br/>Examples: Follow-up on complaints, ghost riders, supervision, client advocates.</p>   |  |

## SCHOOL BUS

Grantees are prohibited from providing exclusive school bus service unless the service qualifies under an allowable exemption and is approved by the FTA Administrator. In no case can federally-funded equipment or facilities be used to provide exclusive school bus service. Head Start transportation is considered human service transportation, not school bus service.

|   |  |
|---|--|
| <p>1. Is exclusive school bus service operated?<br/>If yes, does it qualify for one of the three statutory exceptions?</p> <ul style="list-style-type: none"><li>▪ The grantee operates a school system and operates a separate and exclusive school bus service.</li><li>▪ Existing private school bus operators are unable to provide adequate, safe transportation.</li><li>▪ The grantee is a public body that operated school bus service prior to 1973.</li></ul> <p>Has the FTA administrator approved the service?</p> <p>Is it operated only with non-federally funded equipment and from non-federally funded facilities?</p> <p>Grantees are prohibited from providing exclusive school bus service unless the service qualifies under an allowable exemption and is approved by the FTA administrator. In no case can federally funded equipment or facilities be used to provide exclusive school bus service.</p> |  |
|---|--|

# PLANNING AND COORDINATION

## TITLE VI--NONDISCRIMINATION IN THE DELIVERY OF SERVICE

FTA and Montana prohibit discrimination on the grounds of race, color, national origin, sex, age, physical or mental disability, or religion in the delivery of public transit services. FTA also prohibits discrimination on the grounds of low income status. Montana also prohibits discrimination on the basis of marital status. The board must adopt Title VI complaint procedures. Title VI complaints must be reported to MDT within 24 hours of receipt of the complaint.

|  |  |
|--|--|
| <p>1. How are clients selected?<br/>Does the process ensure that service is provided without regard to race, color, creed, national origin, sex, age, disability, low-income status, or marital status?</p>  |  |
| <p>2. Have you adopted the MDT recommended Title VI complaint procedures?<br/>Were the procedures approved by the board?<br/>Who investigates complaints?</p>  |  |
| <p>3. Have any complaints concerning discrimination in the delivery of service been received since the last review?<br/>If yes, how were the complaints identified and resolved?<br/>Did you report the complaints to MDT within 24 hours of receipt of the complaint?</p> |  |

## PLANNING

Grantees must have effective procedures for estimating ridership.

|  |                                  |
|--|----------------------------------|
| 1. How is ridership estimated for applications?  |                                  |
| 2. Reviewer, please list the annual ridership estimate from the application and the quarterly reports since the last site visit. Grantee, please explain any differences between actual and estimated ridership? |                                  |
| <b>Source</b>  | <b>Ridership Estimate/Actual</b> |
| Application  |                                  |
| Quarterly report   |                                  |
| Quarterly report   |                                  |

## COORDINATION

Grantees must coordinate to the maximum extent feasible with transportation assisted from other federal sources. Grantees located in the planning area of a metropolitan planning organization (MPO) must ensure that their projects are included in a transportation improvement program (TIP) for the area.

| <p>1. Reviewer, please refer to the explanation in the application and describe how the grantee coordinates with other transportation providers in the area.</p> <p>Grantee, since submitting your application, have any additional efforts been made to coordinate service? If yes, please describe.</p>                     |                     |                            |               |                     |   |
|---|---------------------|----------------------------|---------------|---------------------|---|
| <p>2. The list below contains all Section 5310 and 5311 grantees that operate in your service area, how many vehicles they operate, the days and hours of operation, and the number of trips they provide. Please list your efforts to coordinate with each agency and the reasons for not coordinating with each agency.</p> |                     |                            |               |                     |   |
| Section 5310/DPHHS Grantee*   | Number of Vehicles* | Days and Hours of Service* | No. of Trips* | Avg Rides Per Mile* | Coordination Efforts/Reasons for not Coordinating |
|   |                     |                            |               |                     |   |
|   |                     |                            |               |                     |   |
|   |                     |                            |               |                     |   |
|   |                     |                            |               |                     |   |
| <p>*To be completed by reviewer before sending the questionnaire to the grantee.</p>  |                     |                            |               |                     |   |
| <p>3. Are there more opportunities for coordination?</p>  |                     |                            |               |                     |   |
| <p>4. What groups are represented on the local transportation advisory committee (TAC)? Are private-for-profit and private-nonprofit transportation providers represented on the TAC?</p>   |                     |                            |               |                     |   |
| <p>5. Have you submitted your application to the TAC for review and comment?</p>  |                     |                            |               |                     |   |
| <p>6. Did you provide reasonable notice to transportation providers when you submitted your application?</p>  |                     |                            |               |                     |   |

|  |  |
|--|--|
| <p>7. Which of the following coordination activities occur?</p> <ul style="list-style-type: none"><li>a) Consolidated purchase of service</li><li>b) Central information center</li><li>c) Centralized dispatch</li><li>d) Planning</li><li>e) Maintenance</li><li>f) Purchasing (vehicles, parts, fuel)</li><li>g) Training</li><li>h) Management (marketing, information system, billing)</li><li>i) Other (please describe)</li></ul> |  |
|--|--|

# SWOT ANALYSIS

The reviewer will analyze strengths, weaknesses, opportunities, and threats with the grantee during the site visit.

| <b>Strengths</b>     | <b>Weaknesses</b> |
|----------------------|-------------------|
| <b>Opportunities</b> | <b>Threats</b>    |
|                      |                   |
|                      |                   |

## SUMMARY OF CORRECTIVE ACTIONS

| Finding | Corrective Action | Response | Response Days/ Date | Comment | Date Closed |
|---------|-------------------|----------|---------------------|---------|-------------|
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