



# 5 Best Practices and Peer Review

Research was conducted on specific peer states and national best practices that could serve as resources moving forward. The peer review assists in the assessment of how Oklahoma’s transit program compares with those in similar states, while the best practices provide additional examples on how other states have approached certain policies, programs, and issues that can be explored by Oklahoma.

This chapter presents the results of this research and includes the following components:

- **Peer state considerations** - Describes the process for selecting five states that served as peers for the review.
- **Peer state review** - Highlights key aspects from the review, and provides an overall summary of how each administers

transit funding, for the following states: Arizona, Iowa, Kansas, Ohio, and Oregon.

- **National best practices** - Provides specific examples beyond the five peer states, particularly on themes identified by the Steering Committee and through local stakeholder interviews.

The project team’s knowledge of national best practices served as the initial foundation for the research, with additional information obtained through:

- Interviews with staff from the five peer states.
- SMPs and other resources posted on the peer state websites.
- Best practices and other information available through national technical assistance centers.



## PEER STATE CONSIDERATIONS AND SELECTION

Consideration for the selection of states to serve as peer reviews began with those that compare to Oklahoma's population and density. Figure 5-1 provides this comparison to the states with similar demographics, along with the number of transit systems that operate in the state, and federal and state transit funding amounts.

**Figure 5-1 Potential Peer States Based on Population and Density**

State	Population	Density <sup>1</sup>	Number of Transit Systems <sup>2</sup>					FY 2018 Section 5307 Funding	FY 2018 Section 5311 Funding	Total State Transit Funding	FTA Tribal Transit Funding <sup>4</sup>
			Total	Urban	Small Urban	Rural	Tribal <sup>3</sup>				
Connecticut	3,565,287	735.9	22	15	2	4	1	\$102,161,487	\$3,119,678	\$632,110,145	\$ 335,068
Kentucky	4,467,673	112.4	32	5	4	23	0	\$26,209,174	\$17,771,944	\$1,702,686	\$ -
Louisiana	4,648,794	106.7	49	4	8	37	0	\$36,868,627	\$12,131,395	\$4,955,000	\$ -
Missouri	6,137,428	89.3	37	6	6	24	1	\$49,656,528	\$18,683,157	\$2,074,625	\$ -
Minnesota	5,639,632	70.8	49	6	7	30	6	\$65,084,051	\$16,465,890	\$448,811,000	\$2,017,562
Arizona	7,278,717	64.1	51	6	4	30	11	\$79,601,984	\$12,511,753	\$11,725,113	\$2,519,522
Mississippi	2,976,149	63.4	23	0	3	19	1	\$8,570,711	\$14,930,104	\$1,600,000	\$715,733
Arkansas	3,017,804	58	17	3	5	9	0	\$13,455,423	\$12,897,605	\$3,532,228	\$ -
<b>Oklahoma</b>	<b>3,956,971</b>	<b>57.6</b>	<b>37</b>	<b>2</b>	<b>3</b>	<b>20</b>	<b>12</b>	<b>\$18,723,775</b>	<b>\$15,613,998</b>	<b>\$5,750,000</b>	<b>\$7,612,429</b>
Iowa	3,155,070	56.5	35	12	7	16	0	\$21,235,750	\$12,970,543	\$15,842,891	\$ -
Colorado	5,758,736	55.5	43	3	3	36	1	\$79,999,233	\$11,954,931	\$25,000,000	\$130,621
Oregon	4,217,737	43.9	59	4	7	43	5	\$59,136,389	\$12,870,592	\$32,033,345	\$770,998
Utah	3,205,958	39	9	1	2	5	1	\$51,083,855	\$6,662,790	\$ -	\$136,545
Kansas	2,913,314	35.6	157	2	4	150	1	\$17,947,938	\$11,736,556	\$11,000,000	\$117,751
New Mexico	2,096,829	17.3	36	2	4	21	9	\$24,709,449	\$10,925,909	\$5,700,000	\$655,083

Source: American Association of State and Highway Transportation Officials (AASHTO) Survey of State Funding for Public Transportation.

<sup>1</sup> Information calculated using information from <https://statesymbolsusa.org/symbol-official-item/national-us/uncategorized/states-size>

<sup>2</sup> Information found in AASHTO Survey of State Funding for Public Transportation.

<sup>3</sup> Number of Tribal entities receiving funding under the FTA section 5311(c) Tribal Transit formula funding program for 2019.

<sup>4</sup> FY 2018 formula funding apportionment under the FTA section 5311(c) Tribal Transit program.



## States Selected for Peer Review

A typology of state roles regarding implementation of rural, regional, intercity, and small urban transit services would likely include three general classifications:

- **“Top-down”**: States that have done state-level analyses and implemented policy changes, funding formulas, or initiatives to direct or mandate local program implementation to address transit needs identified at the state level regarding transit service levels, types, and coverage. Often these policy initiatives are linked to state funding and may be enabled or directed by state legislation. The state may even be an operator of transit services, either directly or through contracts. In these programs, the initiative comes from the state transit program to a large extent, and local participation may be required.
- **“Bottom-Up”**: States that have identified a need for transit service improvement or development, and are providing encouragement and support for local efforts, for example by providing technical assistance, support for inputs (training, shared or common technology, joint procurement), funding for feasibility studies or planning, funding for transition costs, or incentive funding for implementation of particular types of services, organizational changes, etc. The initiative is seen to be local, but the state’s role is based on a policy vision and provision of enhanced support to the local implementation. Local participation is largely voluntary.
- **“Permissive/compliance-oriented”**: State transit programs that have not identified any particular vision or policy regarding the need or benefit of transit services, and the primary focus is on offering federal transit funds to eligible applicants through the federal program structure and ensuring compliance with state and federal requirements rather than defining transit needs and addressing them in any specific way. The outcome of the program is up to the subrecipients.

For the most part, no state fits any one of the three models completely. A state may be permissive with one program, and prescriptive with another. Also, it should be noted that all states must conduct oversight to ensure federal program compliance, so all three models do get involved in compliance. The differences are the degree to which the state program goes beyond that role. There are examples of states that have combinations of approaches, such as Kansas which has legislatively mandated rural regional transit organizations but is incentivizing rural regional services as one potential strategy that may be implemented by regional organizations. Often the intercity program is the first place where a direct state role in designing services and contracting for them takes place.

The shift from a “permissive/compliance-oriented” program to one of the other two types is often linked to a change in the political environment—transit needs are recognized in the political sphere, the legislature contemplates more funding, but there is a need to identify and agree on what the funding should do, how much is needed—leading to a statewide study of some sort. The change in roles then follows as the result adds state funding to the overall program, with some sort of legislatively defined purpose, eligibility, allocation, and performance standards. Often the study and the funding program are two sides of the same coin—more transit funding is not possible unless there is an agreed upon plan for its distribution and usage.

Based on a review of population, population density, number of transit systems, FTA funding, Arizona, Iowa, Kansas, Ohio, and Oregon were identified for the peer review. In terms of the typology of state programs, Oregon and Ohio are similar to the top-down model, while Arizona, Kansas and Iowa are more similar to mixed models. The location of a state in a particular FTA Region was not considered as a factor and based on the demographics and numbers of transit systems

none of the selected states were from FTA Region 6.

While a variety of information was obtained through the peer reviews, the overall focus was on these areas:

- **Governance and funding:**
  - Policy-making structures (boards, commissions, advisory groups)
  - State funding programs
  - Funding allocations
  - Planning process
  - Reporting and performance assessment
  - Compliance and oversight
  - Training and technical assistance
- **Capital needs:**
  - Monitoring and responding to the capital needs of local transit agencies
  - TAM plans
  - Statewide procurement procedures
  - Management of state and federal funding to address capital needs
  - Regionalization of operating facilities, or other actions designed to maintain the state’s transit assets
- **Mobility management and coordination:**
  - Statewide mobility management programs
  - Local/regional Mobility Managers
  - Coordination strategies as basis for funding
  - One-call/one-click information centers and other efforts to improve access to information on mobility options
  - Regional coordination strategies
  - State agency level coordination councils
  - Implementation of federal coordinated planning processes and other state efforts to enhance and support improved coordination of human service and public transit

- **Support for intercity bus and regional services:**

- State utilization of FTA section 5311(f) to maintain connections between rural areas and urban centers
- Intercity bus consultation and planning process
- Use of in-kind match to support intercity bus services
- Development of state-branding of intercity and regional services
- Efforts for enhanced connectivity of intercity and regional services with other travel modes
- Use of state match for intercity and regional services

- **Technology:**

- States that have developed models of technology support for transit operators
- Funding to support technology improvements and upgrades
- Statewide technology procurements
- Use of GTFS data and user information systems

- **Tribal transit:**

- Involvement and coordination with transit services provided by tribal entities
- Relationship with FTA Tribal Transit programs



## PEER STATE REVIEW KEY TAKEAWAYS

This section presents summary results from the peer reviews, calling out key aspects of each state's program. Complete documentation of the programs in these states is provided in Appendix E. These reviews provided the opportunity to obtain information on state-level legislation and policy decisions that impact the administration of federal and state funding programs.

### Arizona Department of Transportation

**Arizona tribal transit:** ADOT has a strong working relationship with its tribal communities with the state emphasizing the needs of tribal communities through funding, technical assistance, and respect for the tribal sovereignty. The tribal communities in Arizona are direct recipients for FTA Tribal Transit grant funds, however many of these communities compete for 5311 and 5310 funding. To assist these communities, the Multimodal Planning Division (MPD) has two Tribal Liaisons both of which are members of tribes within Arizona. These liaisons assist tribes with starting, sustaining, and improving transit services in their communities as well as navigating the applicable state and federal regulations and guidelines attached to transit funding. This has resulted in significant success in improving mobility for tribal communities across Arizona.

**Mobility management:** In addition to the regional coordinated planning efforts, ADOT works with state COGs and MPOs in administering mobility management functions. There are 10 Mobility Managers in the state (nine funded by ADOT and one funded by the city of Phoenix). The Arizona approach to mobility management is innovative, customer-driven, and focused on managing and delivering coordinated transportation services. Helping customers includes assistance to older adults, people with disabilities and individuals with low incomes to gain mobility and get to where

they need to go. The 10 Mobility Managers in the state work closely with the COGs, MPOs and ADOT to facilitate these efforts tailored to each individual region in the state.

**Support for intercity service:** ADOT awards 15% of its 5311 formula funds to intercity service per FTA guidelines. As a result, the state has eight feeder services run primarily by rural operators that connect to the national network of intercity services (primarily Greyhound services along I-40 and I-10).

**Regional model for planning and support:** ADOT relies heavily on COGs and MPOs for planning, technical assistance, and transit support. As entities governed by local elected officials, each COG employs full-time planning staff to prepare and implement a comprehensive transportation work program. COGs perform a variety of transportation services for their constituent partners, which may include local tribes. These services consist of providing technical assistance and training to support communities and transit agencies in applying for state and federal transportation grants, conducting data collection and projections, developing a TIP, implementing human services transportation and public transit planning and coordination, and providing a forum for public input and review. Overall, the COGs serve as an intermediary between local and regional stakeholders and state and federal transportation agencies.

## Iowa Department of Transportation - Public Transit Bureau

**Legislated coordination of publicly-funded passenger transportation services:** The state of Iowa has long emphasized the need for coordination of publicly-funded passenger transportation services to maximize the transportation benefits that can be achieved with limited resources. State law requires all agencies providing or purchasing publicly-funded passenger transportation services to coordinate such services and funding through urban or regional transit systems designated by local officials in accordance with Chapter 324A of the Code of Iowa. Chapter 324A divided the state's 99 counties into 16 multi-county public transit regions, and provided that a single agency should be designated by the counties within each region to be responsible for the provision of all transit services in the region not performed by an urban transit system. Each designated transit system is thus responsible for coordination of all publicly funded passenger transportation, thereby making all transit systems eligible for funding under FTA section 5310.

**Consolidated transit funding application:** Iowa's Consolidated Transit Funding Application serves as the single multi-part application for funding by subrecipient transit systems under Iowa's statewide FTA section 5310, FTA section 5311, FTA section 5339, and Congestion Mitigation/Air Quality Program (CMAQ) grants. Iowa's Consolidated Transit Funding Application is used by all transit agencies to apply for State Transit Assistance (STA) program funding. Funds for public transit projects are allocated among Iowa's regional and small urban transit systems through a performance-based formula, which uses the statistics from the

last fiscal year. The Iowa DOT Public Transit Bureau determines which type of funds each transit system receives, based on the nature of the projects programmed. FTA section 5310 funds are targeted to systems that purchase services from sub-providers, and the FTA section 5311 funds are targeted first to systems that provide their services directly.

**Iowa Transportation Coordination Council:** In 1976 the Iowa Legislature adopted the first-in-the-nation coordination law, with a compliance review process added to the legislation in 1984. Subsequently the Iowa Transportation Coordination Council (ITCC) was created in 1992, with original members including the Iowa Department of Transportation, the Iowa Department of Human Services, and the Iowa Department of Elder Affairs. The ITCC mission is to provide statewide leadership on transportation coordination to improve the mobility of Iowans. The ITCC was later expanded, and now includes membership from statewide organizations, state departments, and federal groups. The ITCC's membership now consists of many state level agencies and non-profit groups all with an interest in coordination of transportation in Iowa.

Chaired by the Public Transit Bureau, the ITCC meets bi-monthly and discusses such issues as mobility management, accessibility of transportation in Iowa, STA Special Project Proposal applications pertaining to coordination, and the encouragement of state and local agencies' involvement in the passenger transportation planning process.



## Kansas Department of Transportation - Office of Public Transportation

### **Kansas Coordinated District Council:**

The State Legislature established 10 Coordinated Transit Districts (CTD), which serve as the administrative structure across the state for the purpose of providing financial and administrative assistance to transportation systems. To receive state and/or federal transit funds, recipients are required to become a part of a CTD. The Kansas Coordinated Transit District Council (KCTDC) is an advisory group to the Kansas Department of Transportation (KDOT) Division of Planning and is comprised of a representative of all 10 CTDs. This group helps KDOT review all applicable grant applications as well as assisting in regional coordination and mobility management functions.

**State funding support:** Kansas has a state transit funding program (Access Innovation Collaboration Program) designed to give recipients more flexibility and innovative approaches than may be possible with FTA grant programs only. The goal is to broaden the range of possible projects with state funding. The program includes bus replacement, rehab, and purchase; bus related equipment; bus facilities; pilot programs; and limited operations. Eligible applicants include local governments, transit agencies, tribal nations, and non-profit agencies. The state allows flexibility in the use of FTA section 5310 funds that

is compliant with FTA regulations and guidelines but more expansive than what is currently administered in Oklahoma. This includes up to \$10,000 for operations for systems with up to 10 vehicles and \$20,000 for systems with more than 10 vehicles. KDOT has a group insurance pool available to all subrecipients if desired which helps lower the cost of insurance through economies of scale.

**Mobility management:** Kansas is implementing a new statewide mobility management system which has a Mobility Manager in each CTD. Each CTD must agree to support a Mobility Manager, and an agency in that CTD must offer to be the Mobility Manager's host agency before KDOT will consider placement. Funding for the first year of a CTD Mobility Manager is covered at 100% (KDOT covers the local match for the first year). Thereafter, the Mobility Manager is responsible for ensuring that there are enough local funds to match for year two, and every year thereafter. KDOT plans for a board of directors to be created and comprised of those member jurisdictions that financially back the Mobility Manager for their region. This board will be responsible for developing the position description, scope of work, budget (which must be approved by KDOT annually), and ongoing guidance for the Mobility Manager.

## Ohio Department of Transportation - Office of Transit

**Supporting local, regional and statewide mobility management:** The purpose of the Ohio Mobility Management Program is to increase access to mobility for Ohioans by increasing understanding and awareness of transportation needs, coordination of transportation options to meet needs, and building sustainable and healthy communities by integrating transportation into planning and programs. The program supports 28 local and regional Mobility Managers, primarily funded through the FTA section 5310 program. Mobility managers are housed

within different agencies that have taken the lead on coordination efforts, and are a mix of transit systems, planning agencies, and human service providers. The program is overseen by a Statewide Mobility Coordinator position located in the Office of Transit that was created in 2017. This position conducts quarterly in-person meetings with local and regional Mobility Managers, provides resources to enhance and support improved coordination of human service and public transit, and facilitates a Mobility Manager training program.



**Implementing the Ohio Transit Partnership Program (OTP2):** Ohio Department of Transportation instituted this program to provide state funds to rural and urban transit systems, beginning in FY 2020. The purpose of OTP2 is to facilitate the most efficient and effective use of state funds in the provision of public transit services, while meeting transit system needs, improving economic conditions, and providing a quality-of-life environment for the state of Ohio. OTP2 is a discretionary program, with projects selected on a competitive basis between two tiers. One focuses on preservation and maintaining a sound transit network in Ohio, and the other is focused on innovation in the areas of regionalization, coordination, technology, service expansion, workforce initiatives, and healthcare initiatives.

**Support for intercity and regional services:** Ohio has long used the FTA section 5311(f) program to support the provision of connected intercity bus service linking rural Ohio with the national intercity bus network. The state provides its FTA section 5311(f)

funding as a grant to a private non-profit organization, the Hocking-Athens-Perry Community Action Program (HAPCAP), that manages the FTA section 5311(f) program for the state. HAPCAP has led the development of a statewide brand for the FTA section 5311(f) services, GoBus. There is a GoBus website, <https://ridegobus.com/>, a staffed information/service assistance desk, and a GoBus ticketing system. The buses of both contracted carriers are fully wrapped with the GoBus branding.

**Maximizing the use of FTA section 5311 program funding:** To maximize use of the FTA section 5311 program for operations, the Office of Transit funds vehicle replacement and expansion vehicles eligible for that program through the FTA section 5339 program. The selection process for funding is focused on preservation rather than expansion, with the program goal and the desire to ensure that a state of good repair (SGR) is maintained for fleets and capital assets. Funding is awarded to ensure statewide distribution.

## Oregon Department of Transportation - Rail and Public Transit Division

**Transit Program Organization:** The Oregon program staff believes that their organizational structure has improved their relationship with operators across the state, stakeholders, and policymakers (including the legislature). Aspects of the transit program include:

- Placing the primary communication and technical support role on Regional Transit Coordinators (RTCs), one for each region. These staff members are residents in their region.
- Concentrating policy, planning, oversight, and administration staff at headquarters.
- Integration with other elements of Oregon Department of Transportation, through the location of the RTCs in region, and the participation with other offices at headquarters.

### Public Transit Advisory Council (PTAC):

The PTAC was created by the Oregon Transportation Commission to be advisory to them and to the division staff. The council:

- Has representation from both large and small transit agencies.
- Has representation from other key state agencies, including Oregon Health Authority.
- Operates with the dual role of providing policy direction on current needs and funding.
- Provides strategic direction and tactical guidance to Oregon's public transit program, documenting progress toward that vision.
- Focuses on implementing the *Oregon State Public Transportation Plan*.

**FTA section 5310:** Key role of FTA section 5310 programs as part of an integrated public transit program include:

- Allowable use of funds for other than vehicle capital.

- Most FTA section 5310 funding used for purchase of service from public transit or consolidated providers.
- Major support for Mobility Management.
- Vehicle capital largely from other programs.
- Transit planning integration through Coordinated Plans and Transit Development Plans (TDPs).

### Regional and intercity transit network:

State role in identifying and creating a statewide transit network to address regional and intercity connectivity needs through the Transit Network Program.

- Use of part of the FTA section 5311(f) funding for state-directed and branded contracted services to fill gaps in the unsubsidized intercity bus and Amtrak network.
- Use of part of the FTA section 5311(f) funding for discretionary projects developed by local public and private non-transit agencies—state project selection based on unmet needs analysis.
- Statewide Transportation Improvement Fund (STIF) funding for additional regional services addressing identified needs not eligible for FTA section 5311(f).
- Tools for analysis of unmet needs developed and maintained by state—Transit Network Explorer Tool (TNExT).

**Transit planning:** A combination of funding support, technical assistance, and requirements to encourage local transit plans as a basis for funding and service implementation/expansion include:

- Statewide transit plan to involve the public and determine the vision.
- Support for local plans—TDPs, Coordination Plans.

## Oregon Department of Transportation - Rail and Public Transit Division

*Continued*

- Integration of planning into programs—Use of TDPs and local coordination plans as a requirement for proposed service expansion in the STIF program.
- Requirement for STIF plan to obtain state funds for expansion—focus on legislative policy goals including mobility for low-income households.
- State support for planning tools-TDP Manual and training, TNEt access analysis tool, GTFS data created and maintained for every system, statewide Remix license.
- Public support to meet needs demonstrated to legislators through planning process.



## BEST PRACTICES

Beyond the five states that served as primary peers, best practices and examples from other states that could serve as appropriate resources were also identified and are detailed in this section. These practices were consistent with major themes identified through the stakeholder interviews and involve: FTA section 5310 program administration and oversight; coordination and overlapping service areas; NEMT; lack of funding for new vehicles; training and technical assistance; technology; need for expanded transportation services; and creative funding.

Similar to the state peer reviews, the best practices highlight specific examples where policy decisions were made that impact the administration of federal and state funding programs, along with specific actions at the state level that support local transit agencies and encourage improved mobility.

### FTA Section 5310 Program Administration and Oversight

Stakeholders at the local and regional levels reported issues when the 5310 program was administered by DHS. The transition of the FTA section 5310 program to the OMPT provides a potential opportunity to revisit the oversight of this program, following best practices from other states.

## Washington State Department of Transportation

### *Consolidated Grant Program*

The Washington State Department of Transportation (WSDOT) Public Transportation Division administers federal and state public and specialized transportation grant programs. WSDOT instituted its Consolidated Grant Program approach in 2005 to reduce the grant application burden on both local applicants and state staff.

FTA section 5310 program funds are allocated through the Consolidated Grant Program, that overall includes these five sources:

1. FTA section 5310 Enhanced Mobility of Seniors and Individuals with Disabilities
2. FTA section 5311 Formula Grants for Rural Areas
3. Section 5339(a) Grants for Buses and Bus Facilities Formula Program
4. Paratransit/Special Needs Grant Program
5. Rural Mobility Grant Program

To be eligible for funding through the Consolidated Grant Program, a project must be included in a regional Coordinated Public Transit-Human Services Transportation Plan.

Although FTA only requires this for FTA section 5310, WSDOT extends this requirement to all funding programs included in the Consolidated Grant

Program. Regional Coordinated Public Transit-Human Services Transportation Plans are prepared and updated by the seventeen Regional Public Transportation Planning Organizations (RTPOs) designated across the state.

Following WSDOT's internal screening review and any revisions submitted by applicants, the revised, eligible applications are evaluated and ranked/scored for merit by an external review panel. WSDOT convenes an external review panel with expertise in such areas as rural transit, tribal transit, special needs transportation, asset management, funding, and planning to review and rank each project application.



In addition to (and prior to) the external review panel evaluation, each RTPO evaluates the applications for projects that would serve their region and are included in their Coordinated Public Transit-Human Services Transportation Plan. Applications for projects that are not included in a Coordination Plan are disqualified from further consideration.

The panel scoring is combined with the RTPO grading for each application to determine a final score. WSDOT then ranks all project applications across the state. By this stage of the process, WSDOT knows how much

money will be available in the state funded programs and thus how big the pots of money are to be distributed. WSDOT staff then go through the prioritized list and assign each project to the appropriate grant funding based on applicant, project type and the eligibility parameters for each grant source.

More information on WSDOT's administration of FTA section 5310 and other federal and state funding programs, along with additional details on the Consolidated Grant program, is available at: <https://www.wsdot.wa.gov/transit/grants/home>.

## Maryland Department of Transportation / Maryland Transit Administration

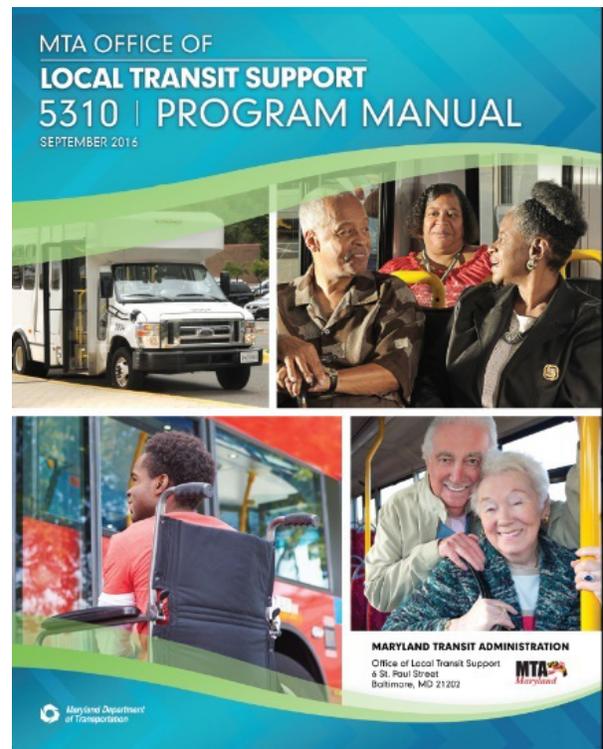
### *FTA section 5310 Program Manual*

The Maryland Department of Transportation Maryland Transit Administration (MTA) is the direct recipient of FTA Enhanced Mobility of Seniors and Individuals with Disabilities Program (FTA section 5310) funds, and through the Office of Local Transit Support (OLTS) administers this program along with other federal and state transit funding.

The OLTS developed a FTA section 5310 program Manual that provides comprehensive guidance on federal and state rules and regulations related to the program. This manual is geared for those subrecipients of FTA section 5310 funds in Maryland who do not also receive other FTA funding through MTA. In most cases these subrecipients are affiliated with human service programs rather than public transit programs, and therefore are not as knowledgeable of federal requirements as are transit agencies.

The OLTS has a strong partnership with the Transportation Association of Maryland (TAM), the state's transit association. Through this partnership TAM hosts a page on their website that provides specific resources, including the FTA section 5310

program manual. This manual, along with program applications and others guides, is available at: [www.taminc.org/office-of-local-transit-support](http://www.taminc.org/office-of-local-transit-support).



## Virginia Department of Rail and Public Transportation

### **FTA section 5310 Program Compliance**

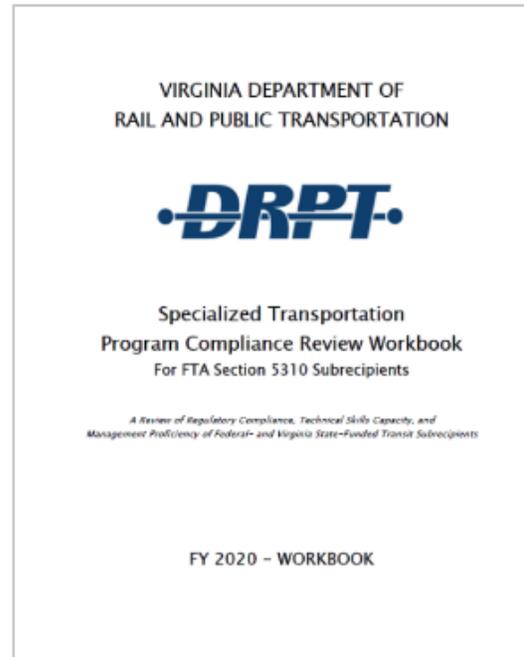
One of the federal programs administered by the Virginia Department of Rail and Public Transportation (DRPT) is the FTA section 5310 program. As part of the oversight of the program DRPT conducts periodic oversight reviews of each organization that receives FTA section 5310 funding. The compliance review process provides DRPT with the opportunity to ensure that:

- Grantees that serve as subrecipients of the FTA section 5310 program funded programs are managing these programs in accordance with the grant application, grant agreement and all applicable laws and regulations using sound management practices.
- Subrecipients have the legal, financial and technical capacity to carry out the intended use of these federal and/or state funds.

The DRPT compliance review process begins by:

- Contacting the subrecipient by phone to scheduling the compliance review, approximately six weeks prior to an on-site visit.
- Following up with an e-mail that confirms the site visit date, explains the purpose of the on-site visit, outlines the day's agenda and provides instructions on how to download the Compliance Review Workbook that needs to be completed in advance of the site visit.

FTA section 5310 program subrecipients Grantees are asked to complete their portion of the Compliance Review Workbook and return it two weeks before the on-site review. They are also asked to send additional information (e.g., copies of written procedures) and other materials requested in the workbook, and then e-mail in advance of the site visit and have other information/material available for review during the on-site visit.



Desk reviews are then conducted using the documentation that a subrecipient has provided. This offers a snapshot of their technical capacity and helps to identify specific items that need to be addressed while conducting the scheduled on-site visit.

The purpose of the site visit is to verify data from the desk review, to obtain information not available during the desk review or provided in advance, and to sample grantee records. For section 5310 subrecipients this portion of the compliance review typically requires half a day, though some program may take a full day.

The goal is to have all grantees fully in compliance with FTA requirements. During the site visits the review team works with subrecipients to bring them into compliance, as some issues could be corrected on the spot. If the subrecipient needs additional corrective actions, these are outlined in the draft compliance report with specific timeframes for corrective actions.

## COORDINATION AND MOBILITY MANAGEMENT

Local stakeholders expressed the need for improved coordination between transit agencies and to reduce duplication when present, and the Oklahoma legislature has noted the direction for mobility management efforts funded by FTA section 5310 dollars. States across the country have implemented a variety of practices to support improved coordination at the local, regional, and statewide levels through mobility management and other coordination activities.

### Nebraska Department of Transportation

#### *Statewide Mobility Management*

Nebraska Public Transit is a program administered by the Nebraska Department of Transportation (NDOT). NDOT's Local Assistance Division is responsible for coordinating public transit activities in Nebraska's 93 counties and provides technical assistance as requested. NDOT receives money from FTA and state transportation funds to fulfill requirements set forth by legislation that designates the department as the principal state agency responsible for coordinating public transit activities in the state.

In 2015, NDOT initiated a Statewide Mobility Management Project, with the goal of improving travel options for residents and visitors of the state. Through Phase 1, a report was produced that identified regional centers across the state that were transportation destinations for medical services, shopping, and employment. During this phase market needs were also analyzed, and concepts were developed to fill gaps in service. In Phase 2, the state was organized into six regions based on the regional centers identified in Phase 1. Statewide and Regional Coordinating Committees were established to identify additional gaps and needs. Focusing



in each region, coordination strategies were developed based on leveraging existing service to improve access, creating system efficiencies to reduce redundant service and expanding transportation access to areas without service.

In 2019, a Statewide Mobility Manager position was put in place to lead and assist with mobility management projects across the state. This position reviews strategies from each region, updates as appropriate, and plans for implementation that works for each region.

The statewide mobility management program is a component of the partnership project between NDOT and the University of Nebraska that was developed to assist with improving and promoting public transit across Nebraska. More information on Nebraska's Statewide Mobility Management Program can be found at: <https://nebraskatransit.com/index.php/mobility-management/>.



## Michigan

### *Mobility Management and Coordination*

In Michigan there are a variety of efforts to improve the coordination of transportation services. These include:

- Implementing local and regional Mobility Managers who support efforts to coordinate services and expand mobility. The Michigan DOT Office of Passenger Transportation annual application process provides funding to support mobility management projects through FTA sections 5310 and 5311 programs.
- Creating a Michigan Mobility Managers Google Group, whose stated purpose is to provide education and support to expand mobility options for their communities. This group meets quarterly through conference calls to share information and to discuss training and other opportunities.
- Conducting a statewide transit study that resulted in 10 regional coordinated mobility plans that served as the basis for regional coordination efforts and met the FTA



coordinated planning requirements for the FTA section 5310 program.

- Creating the Michigan Transportation Connection (MTC) through the Michigan Public Transportation Association. MTC is a 501(c)(3) non-profit organization transportation brokerage, delivering NEMT and other specialized transportation services in some parts of the state. The transportation networking companies (TNC) model utilizes existing taxpayer funded infrastructure, such as the United Way's 2-1-1 Call Centers; Public Transit Mobility Managers; and Area Agencies on Aging Call Centers to serve as Mobility Management Call Centers. More information is available at: <https://www.mitransit.org/index.html>.



## NON-EMERGENCY MEDICAL TRANSPORTATION

Through the stakeholder interview process local transit systems noted the increased competition for LogistiCare NEMT trips. NEMT services help support many FTA section 5310 and FTA section 5311 subrecipients in the state, and the competition is leading to more NEMT being contracted to transportation providers who are operating services at a less expensive rate—but who do not meet FTA and other safety requirements. This situation highlights concerns that arise when FTA section 5310/5311 subrecipients rely on these funds as their only source of local match.

Although each state manages NEMT services differently, changes to the administration of NEMT services usually take place at the state agency level and sometimes as a result of legislation at the state level or significant coordination between different state agencies, practices from other states can be considered.

### Arkansas Department of Human Services

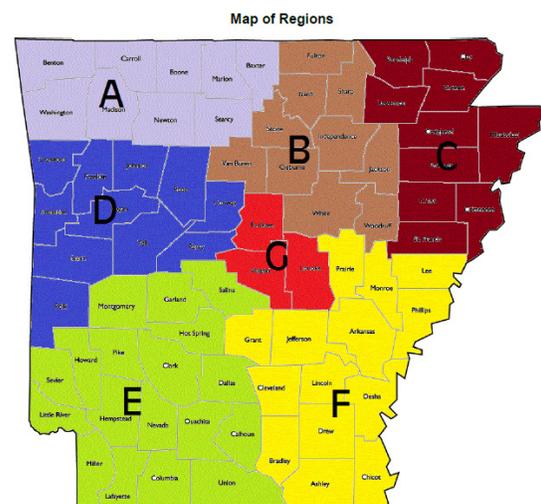
#### *NEMT Services Program*

Transit systems in Arkansas can compete for NEMT contracts and help to ensure there is an appropriate focus on safety and driver training.

The Arkansas Department of Human Services (DHS) administers NEMT services for the state. DHS issues an Invitation for Bid (IFB) to obtain pricing and a contract for these services, that would be provided through a single transportation broker for each pre-established NEMT region (pictured to the right).

Contract terms for the most recent IFB are for one year, and upon mutual agreement by the selected provider and DHS the contract may be renewed on a year-to-year basis, for up to six additional one-year terms.

The IFB states that the highest emphasis will be placed on safety of passengers. To this end the IFB requires transit agencies to have at least five years of experience in operating NEMT services and ensure that all their drivers are in an appropriate United States Department of Transportation (USDOT) drug and alcohol testing program, or a non-USDOT drug and alcohol testing program which mirrors the USDOT requirements. The



IFB also includes a variety of requirements for prescribed criminal and background checks, defensive driving, and CPR and other training, all ones that public transit operators meet and exceed.

With support from the Arkansas Transit Association (ATA), several rural public transit systems have been successful with their bids and operate NEMT services. Specifically, ATA has provided technical assistance with the writing and submission of the extensive proposal that is required in response to the IFB.

## Vermont Public Transportation Association

### *Brokering Medicaid NEMT*

The 10 transit agencies in Vermont had, for many years, been operating the Medicaid NEMT program in Vermont through the Department of Vermont Health Access (DVHA). These transit agencies managed the entire program: they accepted trip requests, approved trips and passenger eligibility, and provided trips, typically using an array of transit agencies. Volunteer drivers were often used to provide the Medicaid trips, and transit agencies and other providers were also used.

DVHA decided to change its model to a capitated brokerage. This new model required a broker to do the intake and

eligibility functions that the transit agencies were already doing. Based on experiences in neighboring states, the transit agencies felt that the capitated model was not conducive to the use of public transit. Moreover, without Medicaid NEMT, the transit agencies would lose critical funding that would impact their services, much of which was access to health care.

The transit agencies, through the Vermont Public Transportation Association formed a consortium to submit a proposal to manage and operate the Medicaid NEMT brokerage. Their proposal was successful. The service has been in operation for three years.



## ADMINISTRATION OF CAPITAL FUNDING

Local stakeholders expressed concerns with relying on vehicles beyond their useful life, and the lack of resources to acquire new ones. In addition to the peer states, other examples of effective TAM plans, procurement procedures, and management of state and federal funding to address these capital needs, can be considered.

### Virginia Department of Rail and Public Transportation

#### *TransAM*

TransAM is the system the Virginia Department of Rail and Public Transportation (DRPT) uses to track the asset inventories of the transit agencies across the commonwealth. The asset data is currently used to determine when replacement assets should be funded, as well as to forecast SGR needs of the transit agencies.

Subrecipients are responsible for updating the inventories when vehicles are received or sold, facilities are built or rehabbed. Beginning in FY 2020, DRPT is allocating capital funds by a scoring mechanism, and the prioritization of replacement assets is based on the data in TransAM. The TransAM requirements and process involve:

- **Assets:** Subrecipients must update all assets by February 1 and August 1 of each year. This process includes removing old assets and adding newly received assets to the inventory, as well as, updating condition codes and mileage.
- **Rolling stock:** The TransAM inventory includes all revenue vehicles that are purchased with state-controlled funding sources. Subrecipients need to include any vehicles that are being used to fulfill programmatic goals and that they intend to seek state funding to replace at the end of its useful life. Midlife overhauls are also tracked in TransAM.



- **Equipment:** Although the federal TAM Plan only requires inclusion of items or groups of items valued more than \$50,000, DRPT requires that all service vehicles be entered into TransAM and updated as needed. Likewise, although the TAM Plan only requires including pieces of equipment that are more than \$50,000 in value, any large individual assets (lifts, washes, etc.) must be entered in TransAM so the application to replace an asset can be evaluated as SGR need.
- **Facilities:** All transportation, transit or transfer centers, park-and-ride facilities, and transit malls if they have an enclosed structure (building) for passengers for items such as ticketing, information, restrooms, concessions, and telephones must be entered into TransAM.

Additional details on DRPT's TransAM system are available at: <http://www.drpt.virginia.gov/media/2602/trans-am-entry-requirements-final-1.pdf>

## TRAINING AND TECHNICAL ASSISTANCE

Local and regional stakeholders noted the need for assistance from the state level (i.e., ODOT or OTA) for a variety of topics, either through training opportunities or other resources.

### Arkansas Department of Transportation

#### *Rural Technical Assistance Program Administration by Arkansas Transit Association*

The Arkansas Transit Association (ATA) administers RTAP for the state through a grant agreement with the Arkansas Department of Transportation (ARDOT). All RTAP funds received by Arkansas are passed to ATA through this agreement. The ATA Board of Directors serves in the advisory capacity for the RTAP funding.

RTAP funds support a full-time trainer employed by the association, and ATA notes that their award-winning training program is widely known as one of the most effective and innovative in the country. ATA provides public transit, paratransit, and community human services agencies with a wide range of passenger transportation trainings.

ATA's Training Program specializes in passenger transportation safety, and a variety of low-cost courses are conveniently offered to ATA members. Courses are adapted to each agency's specific needs, and ATA states that great care is taken to deliver updated and relevant material. A course listing is available at <https://www.arkansastransit.com/training/course-descriptions/>.

ATA's offices are in the Arkansas Public Transit Safety and Resource Center in North

Little Rock. Built in 2002 with federal and state funding assistance, this training facility hosts trainings as well as a variety of meetings, workshops, and seminars.

ATA also co-sponsors an annual Public Transportation Conference in conjunction with ARDOT and FTA. In addition, ATA administers three Drug and Alcohol Testing Program Consortia for employee testing and helps with policy development, training, and legal compliance. Other association benefits include a Workers' Compensation Self-Insured Trust Fund, and free traffic violation reports for public and non-profit members.

According to the latest national survey of RTAP programs conducted by the National Rural Technical Assistance Program (NRTAP), in 2020 53 percent of the states provided their RTAP programs in-house, with 27 percent completely outsourcing their program, and 20 percent using a combination model with some elements outsourced. Of the 21 states that outsource some or all their program management, six use their state transit associations, three use universities, and eleven use one or more private contractors.

### California Association for Coordinated Transportation (CALACT)

CALACT is a statewide, non-profit organization that represents the interests of small, rural, and specialized transit agencies in California. CALACT is the largest state transit association in the United States, with over 300 members that include operators of small and large systems, planning and government agencies, social service agencies, and suppliers.

CALACT is under contract to the California Department of Transportation (Caltrans) to implement RTAP in California. Through RTAP, CALACT provides technical and training materials produced by the National RTAP and supplements their program with California-specific technical assistance, management workshops, peer networking and scholarship assistance.

CALACT is a co-sponsor of the Transit and Paratransit Management Certificate Program, in partnership with the University of the Pacific Westgate Center for Leadership and Management Development. This certificate program is geared to the management

and future managers of rural, small, and medium-sized transit agencies, human service organizations, or private operators.

More information on the training and technical assistance provided by CALACT is available at: <https://www.calact.org>

## Illinois Rural Transit Assistance Center

The Rural Transit Assistance Center (RTAC) is a program of the Illinois Institute for Rural Affairs, housed at Western Illinois University. RTAC was created in 1990 and operates under an inter-agency agreement with the Illinois Department of Transportation (IDOT). The RTAC mission is to promote the safe and effective delivery of public transit in rural areas and more efficiently use public and private resources.

RTAC fulfills its mission through providing the Rural Transit Assistance Program (RTAP) for

the state of Illinois. RTAC also serves as the clearinghouse for the Illinois Coordinating Committee on Transportation, created by legislation to encourage the coordination of public and private transportation services, with priority given toward services directed toward those populations who are currently not served or are underserved by existing public transit.

More information on the RTAC is available at: <http://www.iira.org/rtac/>.

## North Carolina

### *Driver Training Standards*

In addition to recommending to subrecipients that their staff be trained, a state may adopt a policy that requires subrecipients to ensure that their staff have taken training courses and are maintaining their expertise through continuing training. In 2011, the Public Transportation Division of the North Carolina DOT established a requirement for “Minimum Training Standards for Community and Human Service Transportation Vehicle Operators”. The following types of training are required annually and upon hire:

- Defensive driving (certified program or equivalent)
- Americans with Disabilities Act—training to ‘proficiency’ (expert performance)
  - Sensitivity training
  - Passenger assistance
  - Wheelchair handling
  - Wheelchair securement (passenger and mobility aid)
- Wheelchair lift inspection
- Wheelchair lift operation (normal and emergency)
- Bloodborne pathogens—OSHA Standard
- Emergency procedures
  - Communication and notification procedures
  - Accident/incident reporting procedures
  - Passenger handling procedures
  - Vehicle and facility evacuation procedures
  - Driver and passenger security training
  - Emergency evacuation procedures and training
  - Emergency equipment usage
    - First aid
    - Bloodborne pathogens kit
    - Emergency triangles
    - Fire extinguishers

This list is prescriptive but is not intended to limit training beyond these topics. Subrecipients are required to keep records of training received by staff in their personnel files, and samples of training records are reviewed as part of the subrecipient compliance monitoring process.

As a result of these training requirements, the state's NEMT program agreed to accept the public transit program's subrecipients

as meeting the NEMT training requirements, facilitating their ability to provide client trips under that program.

A state program that requires certain kinds of training also needs to develop and maintain the provision of appropriate training courses and materials to allow the standards to be met, which may necessitate the development of training and technical assistance staff as part of the state program.

## South Carolina Department of Transportation

### *Transit Subrecipient Portal*

The South Carolina DOT Office of Public Transit is responsible for the administration and oversight of federal and state programs that support public transit in South Carolina. RTAP noted that the state program and local operators have gone through three state management program reviews with a clean bill of health and no findings.

As part of the training and technical assistance provided to local transit systems, the Office of Public Transit provides a Transit Subrecipient Portal on their website that

provides a variety of resources, forms, and sample documents. The list includes resources that support:

- Development and submission of funding applications
- Compliance with federal requirements
- Development of TAM Plans

The South Carolina DOT Office of Public Transit - Transit Subrecipient Portal is available at: <https://www.scdot.org/inside/inside-PublicTransit.aspx#portal>



## NEED FOR EXPANDED REGIONAL TRANSPORTATION SERVICES

Local stakeholders noted the need for expanded regional mobility options. This FTA section provides best practices on how other states are supporting these types of service expansions.

### Colorado Department of Transportation

#### *Bustang Interregional Express Bus Service*

Created in 2009 via state legislation, the Colorado Department of Transportation (CDOT) Division of Transit and Rail is responsible for planning, developing, operating, and integrating transit and rail into the statewide transportation system. The responsibilities of the division include administering and expending state and federal funds for transit projects including facilities, equipment, services, and provision of grants to transit operators.

In response to the loss of intercity bus services and the recommendations from a commuter bus study, CDOT implemented interregional express bus service, connecting major populations, employment centers and local transit entities along the I-25 and I-70 corridors under the Bustang brand. This service is operated under contract for CDOT and has been well received, with ridership exceeding forecasts. Nine routes are now in place connecting communities throughout Colorado.

The planning process for the Bustang service focused on the previous intercity and rural regional network and resulted in more detailed route and service proposals. This included potential timetables (allowing consideration of potential connections, the possibility of in-kind match, and assessment of potential duplication of unsubsidized service), a strategy for shifting intercity program routes to competitively bid contracts, and extending the statewide branding concept to rural regional services



and the intercity network, with a goal of implementing a connected statewide network. Funding includes the FTA section 5311(f) allocation with Greyhound in-kind match for maintaining the intercity network, and a combination of shifting of resources and limited state operating funds to initiate rural regional services. There is more state funding available for capital, and CDOT purchased buses to be used for intercity and rural regional services that allowed for lower operating costs, improved services, and common branding under the Bustang name.

Implementation of the Bustang service responded to rural regional needs identified through both regional and state level planning. It was the result of ongoing involvement in the planning process across levels, with local transit agencies and planners participating in the development of state proposals for new service, and state support and involvement in local service planning. To a much greater extent than most states, there is direct state involvement in the design and implementation of regional services and in the vision for a statewide network that includes rural intercity bus routes and rural regional services.

More information on CDOT's Bustang program is available at: <https://ridebustang.com/>.

## Minnesota Department of Transportation

### *Transit for Our Future Initiative - Funding for Regional Projects*

The Office of Transit developed the statewide Transit for Our Future Initiative to encourage and assist established transit agencies to develop and implement local solutions to improve efficiency and service. The initiative developed a framework for this effort that includes three levels of joint action that could be implemented by two or more transit systems to achieve these objectives. These are described by MnDOT as the three C's: Coordination, Cooperation and Consolidation.

- **Coordination:** A formal relationship between multiple systems, each of which maintains a separate identity and authority, including vehicle operation. Coordination may focus to a large extent on information sharing. Examples might include joint support for a mobility coordinator, travel trainer or joint grant preparation.
- **Cooperation:** Involves more joint decision-making and activity between multiple agencies under formal interagency agreements, managing resources of a distinct organization or service. Examples might include a joint Mobility Manager, joint purchasing, and sharing of resources such as technology or facilities.

- **Consolidation/partnering/merging:** Combining all operational authority and control in a single combined agency that provides service based on agreements between the agencies. The basic example is combining multiple systems into a single system with its own policy board, branding, and services.

The MnDOT initiative demonstrates that state transit programs can support the creation of regional transit organizations and services without top-down mandates by offering:

- Technical assistance
- Funding for restructuring/feasibility studies
- Studies/plans to help identify needs for regional services
- Templates for organizational structures, agreements, and contracts
- Funding for transition costs, including re-branding, marketing, changes to hardware and software, and human resources costs
- Funding for operations of new regional services (until they can be included in ongoing grants to the consolidated system)



## TECHNOLOGY

Through the local interviews the need for improved technology was a theme. The accepted best practice by many states is to allow transit systems to procure their own technology with support from the state DOT. An Arizona DOT representative indicated that there are too many differences and variations in the system's needs for the state to attempt to conduct a procurement that would satisfy the operators. Transit systems in many cases are simply conducting their own analysis and procurement with state technical and funding support.

Like the peer states, most state DOTs provide a variety of support in the acquisition of technology. This may include seeking and administering federal funding that can support technology improvements such as federal funds through the U.S. DOT Better Utilizing Investments to Leverage Development (BUILD) Transportation Discretionary Grants program (formerly the Transportation Investment Generating Economic Recovery grant program known as TIGER). As discussed in the Ohio peer review, federal funds may be acquired for use with technology improvements such as new communications, scheduling, and dispatching software for rural transit operators.

States can also pursue and facilitate efforts to support local transit agencies with technology improvements through state level education opportunities. For instance the recently launched National Center for Applied Transit Technology (N-CATT), a technical assistance center funded through a cooperative agreement between CTAA and FTA, is partnering with state DOTs in Maine, Minnesota, Mississippi, and New Mexico to host State Technology Summits for small urban, rural, and tribal transit operators in those states. Each State Summit will provide an organized forum for attendees to discuss achievable goals for their systems and learn about promising practices, collaboration strategies and potential solutions. Participants will develop specific, measurable plans to accomplish their technology goals.

### Nebraska Department of Transportation

#### *Nebraska Transit Technology*

Nebraska is one state currently in the process of a statewide technology project. In early 2020 the Nebraska Department of Transportation (NDOT) created a Request for Qualifications (RFQ) to prequalify several vendors who could provide local transit with scheduling/dispatching software. NDOT requested qualifications for two software packages: a basic software package more useful for smaller agencies, and for a more advanced package. An evaluation team scored each vendor based on the proposals, demonstrations, and cost proposals. Rather than selecting one vendor for each option, NDOT curated preapproved lists for basic and for advanced software for agencies to choose from when selecting a vendor. The primary baseline requirement was that data would be able to be shared between systems and with the state.

NDOT recently completed the evaluation, and subsequently released a software vendor list with vendors that met basic requirements of the RFQ—and are now pre-approved to contract with transit agencies in Nebraska. Vendors were invited to the Nebraska Transit Technology Fair which included transit managers, drivers, and dispatchers, giving them the opportunity to participate in demonstrations and ask questions.

This process followed a previous one through which the state procured a single technology solution, and then any local transit agency who wanted the software could purchase it through that contract. Only four transit systems did so, therefore through the updated process NDOT wanted to provide local agencies with more choices and options.

