

5310 Program Management Plan

2025

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Section 1: Introduction

1.1 Purpose

This Program Management Plan (PMP) outlines the policies, procedures, and administrative framework used by the Charlotte Area Transit System (CATS) to manage the Federal Transit Administration (FTA) Section 5310: Enhanced Mobility of Seniors and Individuals with Disabilities Program. This PMP ensures compliance with applicable federal regulations, specifically FTA Circular 9070.1H, 49 U.S.C. 5310, and subsequent federal guidance.

The PMP provides direction for the solicitation, selection, award, monitoring, and reporting of Section 5310-funded projects within the Charlotte Urbanized Area (UZA). It serves as a resource for program staff, eligible applicants, subrecipients, and oversight agencies.

1.2 Background

The Section 5310 program supports capital and operating projects that improve mobility for seniors and individuals with disabilities where public transportation services are insufficient, unavailable, or inappropriate. Under the Infrastructure Investment and Jobs Act (IIJA), enacted in 2021, the 5310 program continues to support both *traditional* capital projects and *other* eligible activities that improve access, reduce barriers, and enhance coordination.

The City of Charlotte, through its public transit department, CATS, serves as the Designated Recipient of 5310 funding for the Charlotte Urbanized Area. CATS administers all aspects of the program including project solicitation, fund distribution, compliance oversight, and federal reporting.

1.3 Charlotte Urban Area (UA) Definition

The Charlotte Urban Area includes portions of North Carolina and South Carolina as defined by the U.S. Census Bureau and Federal Transit Administration. The UA generally includes:

- All of Mecklenburg County (NC)
- Portions of Gaston, Iredell, and Union Counties (NC)
- Portions of York and Lancaster Counties (SC)

The designated urbanized area is periodically updated based on federal urban area boundary adjustments, most recently following the 2020 Census.

Section 2: Program Goals and Objectives

The primary goal of the Charlotte Area Transit System's Section 5310 Program is to enhance mobility for seniors and individuals with disabilities by supporting transportation services that address gaps in existing public transportation systems and meet the unique needs of these populations.

The following objectives guide CATS' administration of the 5310 program:

2.1 Expand Mobility Options

- Fund projects that improve access to transportation for seniors and individuals with disabilities where existing public transportation is unavailable, insufficient, or inappropriate.
- Support both capital and operating projects that create or sustain essential mobility services.

2.2 Address Barriers to Transportation

- Support projects that directly reduce physical, geographic, financial, and information-related barriers to mobility.
- Encourage innovative approaches such as travel training, mobility management, first/last mile access, and flexible service models.

2.3 Support Coordinated Transportation Services

- Promote regional coordination among public transit providers, human service agencies, non-profits, private providers, and local governments.
- Ensure alignment with priorities identified in the most recent **Charlotte Coordinated Public Transit-Human Services Transportation Plan (CPT-HSTP), adopted May 2025**.

2.4 Ensure Program Accountability and Compliance

- Ensure that funded projects meet federal eligibility requirements, are derived from the Locally Coordinated Public Transit-Human Services Transportation Plan, and demonstrate compliance with all applicable federal, state, and local regulations.
- Administer the program in accordance with FTA Circular 9070.1H and applicable provisions under the Infrastructure Investment and Jobs Act (IIJA).

Section 3: Roles and Responsibilities

3.1 Designated Recipient

The City of Charlotte, through the Charlotte Area Transit System (CATS), is the Federal Transit Administration (FTA) Designated Recipient for Section 5310 funds apportioned to the Charlotte Urbanized Area (UZA). CATS is responsible for administering all aspects of the program, including solicitation of applications, selection of projects, execution of grant agreements, oversight of subrecipients, and reporting to FTA.

3.2 Responsibilities of the Designated Recipient (CATS)

- Administer the 5310 program in compliance with FTA Circular 9070.1H and federal requirements.
- Conduct annual calls for projects, review applications, and select eligible subrecipients.
- Ensure projects are consistent with the Coordinated Public Transit-Human Services Transportation Plan (CPT-HSTP).
- Prepare and submit grant applications, Program of Projects (POP), and required reports via FTA's Transit Award Management System (TrAMS). A draft Program of Projects (POP) will be developed at the Call for Projects. Final POPs will be submitted by Finance no later than the end of October each year.
- Execute grant agreements with subrecipients.
- Conduct subrecipient monitoring, including site visits, financial reviews, and performance tracking.
- Ensure subrecipients comply with all applicable federal, state, and local regulations.
- Submit required financial and performance reports to FTA.
- Manage all financial transactions, drawdowns, and disbursement of funds.

3.3 Subrecipient Responsibilities

- Implement projects in accordance with approved grant agreements and federal requirements.
- Submit required documentation and reports to CATS in a timely manner, including invoices, progress reports, and performance data.
- Maintain compliance with applicable federal and state laws including ADA, Title VI, DBE, EEO, procurement standards, and drug and alcohol testing (as applicable).
- Participate in monitoring activities, site visits, and corrective action plans if necessary.
- Maintain complete financial and programmatic records subject to federal and local audit.

3.4 Metropolitan Planning Organization (CRTPO) Responsibilities

- Include selected projects in the Metropolitan Transportation Improvement Program (TIP) and State Transportation Improvement Program (STIP), as required by federal regulations.
- Collaborate with CATS on coordinated planning efforts and the development of the CPT-HSTP.
- Ensure regional transportation planning processes include consideration of seniors and individuals with disabilities.

Section 4: Coordinated Planning Requirements

4.1 Coordinated Public Transit-Human Services Transportation Plan (CPT-HSTP)

As required by FTA Circular 9070.1H, all projects funded through the Section 5310 program must be derived from a locally developed, coordinated public transit-human services transportation plan (CPT-HSTP).

The most recent plan was completed in May 2025 and addresses the coordinated transportation needs of seniors, individuals with disabilities, and other transportation-disadvantaged populations within the Charlotte Urbanized Area and expanded nine-county study region.

The CPT-HSTP is developed and maintained by CATS as the Designated Recipient for the 5310 Program. CATS is responsible for:

- **Plan Updates:** Updating the CPT-HSTP no less than once every four years to ensure consistency with federal requirements, changes to the urban area, and evolving regional needs.
- **Plan Oversight:** Leading the planning process and managing consultant contracts as applicable.
- **Stakeholder Engagement:** Ensuring inclusive participation from a broad range of stakeholders including public agencies, private transportation providers, non-profit organizations, advocacy groups, and individuals representing seniors, individuals with disabilities, and the general public.
- **Public Engagement:** Conducting public meetings, surveys, and other outreach methods to identify unmet transportation needs and service gaps.
- **Needs Assessment:** Evaluating transportation demand, population growth trends, emerging mobility challenges, and service delivery gaps across the urbanized area.
- **Coordination:** Working with Metropolitan Planning Organizations (CRTPO, GCLMPO, CRMPO, RFATS), state DOTs, local governments, and human service agencies to ensure cross-agency alignment and coordination.
- **Documentation and Publication:** Publishing the final CPT-HSTP and making it available to subrecipients and the public.

Project Eligibility under the Coordinated Plan

- All projects funded under the Section 5310 program must be included in, or consistent with, the needs, gaps, and priorities identified in the most current CPT-HSTP.
- Proposed projects are not required to be specifically named in the CPT-HSTP; however, applicants must clearly demonstrate how their project addresses one or more of the unmet needs, service gaps, or recommended strategies identified in the Plan.
- CATS requires all applicants to submit written justification as part of the application process, documenting the relationship between their proposed project and the priorities or gaps identified in the CPT-HSTP.
- Applications that fail to demonstrate alignment with the CPT-HSTP will be deemed ineligible for funding.

4.2 Coordination with Other Regional Plans

The Coordinated Plan and the Section 5310 Program are fully integrated into the region's broader transportation planning framework. CATS works closely with its planning partners to ensure consistency with:

- The Metropolitan Transportation Improvement Program (TIP)
- The State Transportation Improvement Program (STIP)
- The Metropolitan Transportation Plan (MTP)

Eligible projects selected for funding under the Section 5310 Program must be included in the approved TIP and STIP prior to federal funds being obligated.

Section 5: Eligible Subrecipients

In accordance with 49 U.S.C. 5310 and FTA Circular 9070.1H, the following types of organizations are eligible to receive funding under the CATS Section 5310 Program:

5.1 Eligible Subrecipients for Traditional 5310 Projects

- **Private Non-Profit Organizations:**
    - Must provide transportation services for seniors and/or individuals with disabilities.
    - Must be able to document their non-profit status through IRS 501(c)(3) certification or state incorporation documentation.
- **Governmental Authorities:**
    - Must be either:
        - Approved by the State of North Carolina (or South Carolina for portions of the UA) to coordinate services for seniors and individuals with disabilities; or
        - Able to certify that no non-profit organizations are available to provide the proposed service in the area.
- **Public Transit Agencies:**
    - Public transit agencies may be eligible for traditional capital activities that exceed ADA minimums or for mobility management projects.

5.2 Eligible Subrecipients for Other 5310 Projects

In addition to the entities listed above, the following may be eligible for *Other* 5310 projects that exceed ADA requirements, improve access, or offer alternatives to public transportation:

- **Private Operators of Public Transportation:**
    - Must operate shared-ride transportation services to the public or specific client populations.
    - Must apply through CATS as the Designated Recipient.

5.3 Subrecipient Eligibility Review Process

- All applicants must provide documentation of their legal status, eligibility category, and operational capacity as part of the application process.

Section 6: Eligible Activities and Funding Allocation

6.1 Eligible Activities

All projects funded under the Charlotte Area Transit System (CATS) Section 5310 Program must meet the eligibility requirements outlined in 49 U.S.C. 5310, FTA Circular 9070.1H, and be consistent with the needs and priorities identified in the Charlotte Coordinated Public Transit-Human Services Transportation Plan (CPT-HSTP).

Eligible activities are divided into two major categories: **Traditional Projects** and **Other Projects**.

6.1.1 Traditional 5310 Projects

Traditional projects represent at least 55% of the total annual apportionment and focus on capital investments that directly support the transportation needs of seniors and individuals with disabilities where public transportation is insufficient, unavailable, or inappropriate.

Examples of Traditional 5310 Eligible Activities:

- Purchase of accessible vehicles (buses, vans, paratransit vehicles)
- Purchase of vehicle-related equipment (wheelchair lifts, securement devices, ramps)
- Preventive maintenance for vehicles purchased with Section 5310 funds
- Communications and scheduling systems directly related to service delivery
- Mobility management programs that coordinate transportation services
- Acquisition of transportation services under contract, lease, or other arrangements

6.1.2 Other 5310 Projects

Other projects may not exceed 45% of the total program funds and support operating assistance, service enhancements, and non-traditional capital projects that go beyond ADA requirements or address service gaps.

Examples of Other 5310 Eligible Activities:

- Operating assistance for new or expanded transportation services
- Expansion of paratransit service areas or hours beyond ADA minimums
- Same-day service or door-to-door service enhancements
- Volunteer driver programs
- Accessibility improvements to transit stops (sidewalks, curb cuts, pedestrian signals)
- Voucher programs for specialized transportation services

6.1.3 Ineligible Activities

The following activities are not eligible for Section 5310 funding:

- Services that do not primarily benefit seniors or individuals with disabilities
- Operating assistance for ADA complementary paratransit services required under 49 CFR 37
- Transit passes for fixed-route or ADA-required paratransit
- Construction or acquisition of real estate not directly tied to transit service
- Administrative or indirect costs not directly related to 5310 service delivery

6.2 Funding Allocation Methodology

6.2.1 Funding Formula

Each year, CATS allocates Section 5310 funds in accordance with federal law and program guidance:

Category	**Allocation**
Administrative Costs (Program Administration)	Up to 10% of total apportionment
Traditional 5310 Projects (Capital)	Minimum 55% of total apportionment
Other 5310 Projects (Operating & Non-Traditional Capital)	Remainder (typically up to 35%)

Key principle:

- Administrative costs are deducted first.
- The 55% traditional capital requirement applies to the **entire original federal apportionment**, not the remaining balance after administrative deductions.
- The remaining funds are available for Other Projects after both administrative and traditional capital allocations are satisfied.

6.2.2 Illustration of Allocation Formula

Example based on $1,000,000 annual apportionment:

Category	Allocation
Total Apportionment	$1,000,000
Admin (max 10%)	$100,000
Traditional Capital (min 55% of full apportionment)	$550,000
Other Projects (remainder)	$350,000

Note: The maximum available for Other Projects will decrease if administrative expenses approach the full 10% allowed.

6.2.3 Allocation Enforcement

- CATS runs separate scoring and selection processes for Traditional and Other projects to ensure statutory funding splits are maintained.
- Funding cannot be awarded in a way that violates the 55% capital minimum.

6.3 Administrative Costs and Program Management

6.3.1 Administrative Expenses (Direct Program Administration)

As allowed by federal law, CATS may utilize up to 10% of the total annual 5310 apportionment for program administration. Administrative costs may include:

- Solicitation of applications and applicant technical assistance
- Conducting project scoring, evaluation, and selection
- Preparation and submission of FTA grant applications in TrAMS
- Financial management and reporting (TrAMS, ECHO, NTD)
- Subrecipient monitoring, oversight, and compliance reviews
- Conducting site visits and desk audits
- FTA Triennial Review preparation
- Policy development and program documentation updates
- Updating the Coordinated Public Transit-Human Services Transportation Plan (CPT-HSTP)

Administrative funds are not subject to match requirements and may be fully funded with federal dollars.

6.4 CATS Direct Charges to the 5310 Program

6.4.1 Direct Labor Charges

CATS staff may directly charge time to the 5310 program based on documented hours worked on eligible activities. These activities include, but are not limited to:

- Project solicitation, review, and scoring
- Subrecipient contract preparation and execution
- Federal reporting and data entry
- Financial review and invoice processing
- Subrecipient oversight (site visits, desk reviews)
- Development or update of the Coordinated Plan
- Preparation for FTA audits and reviews

6.4.2 Other Direct Charges

In addition to direct labor, CATS may charge other eligible direct costs to the 5310 administrative budget, including:

- Travel costs for subrecipient site visits and compliance activities
- Consultant fees for technical assistance or coordinated plan updates
- Supplies or materials for public meetings, application workshops, or trainings
- Registration fees for required FTA or grant management trainings

6.4.3 Documentation Requirements

- All labor and other direct charges are supported by appropriate documentation including timesheets, expense receipts, and activity logs.
- CATS maintains internal controls to ensure that all costs charged to the 5310 program are allowable, allocable, reasonable, and properly documented per 2 CFR 200.

Section 7: Project Selection and Evaluation Process

7.1 Overview

CATS administers a competitive selection process to award Section 5310 funding. The application process ensures transparency, consistency, and compliance with federal requirements while prioritizing projects that best address the transportation needs of seniors and individuals with disabilities.

All projects must be consistent with the Coordinated Public Transit-Human Services Transportation Plan (CPT-HSTP), meet program eligibility requirements, and achieve a minimum score to be considered for funding.

7.2 Annual Program Schedule

CATS follows an established annual schedule for the Section 5310 Call for Projects:

Activity	**Approximate Timeframe**
Call for Projects Released	Early August
Technical Assistance Workshops Held	August
Application Deadline	Mid-October
Application Review & Scoring	Late October to Early November
Selection Committee Consensus Review	November
Submission to FTA / Grant Development	December-January
Subrecipient Contracting	Spring (following year)

- CATS may adjust this schedule as necessary based on FTA funding availability, administrative capacity, or changes in federal guidance.
- CATS notifies all stakeholders of upcoming funding cycles in advance through public notices, email distributions, and its website.

7.3 Application Process

- CATS issues a **Call for Projects** annually based on available funding.
- Public notices are posted on the CATS website and distributed via stakeholder outreach.
- Technical assistance workshops are offered for interested applicants.
- Applicants must submit complete applications that include:
    - Project description and justification

- Documentation of need and target population
- Alignment with CPT-HSTP priorities
- Proposed budget and funding sources
- Organizational capacity and staffing
- Proposed performance measures and evaluation plan
- Required certifications and assurances

7.4 Selection Committee

A **5310 Selection Committee** is established for each funding cycle to review and score applications. The committee is composed of:

- CATS staff involved in transit planning, grants administration, and compliance (non-voting member)
- Partner agency staff (e.g. MPOs, human services, and regional transportation stakeholders)
- External subject matter experts (as applicable)
- Committee members may not review any application where a conflict of interest exists.

The Selection Committee:

- Reviews all eligible applications independently.
- Applies the published scoring matrix.
- Participates in a consensus meeting to finalize scores and develop funding recommendations.

All committee members receive education on program rules, scoring criteria, and evaluation protocols prior to scoring.

7.5 Scoring and Evaluation Process

- Applications are scored using a uniform evaluation matrix.
- Total maximum score = 95 points.
- A minimum score of **70 points** is required for funding consideration.
- Applications are scored separately within Traditional and Other project categories to ensure compliance with funding allocation requirements.
- Scoring balances both qualitative and quantitative factors, with emphasis on addressing unmet transportation needs.

7.6 Scoring Matrix and Point Breakdown

Evaluation Category	Max Points
1. Project Needs and Benefits	25
2. Implementation and Coordination	20
3. Project Budget and Cost Effectiveness	20
4. Organizational Capacity and Technical Experience	20
5. Performance Measures and Evaluation	15
Total Possible Points	100

1. Project Needs and Benefits (25 points)

- Goals & Objectives — **5 points**
- Target Population Served — **5 points**
- Reduction of Barriers — **5 points**
- Community Impact — **10 points**

2. Implementation and Coordination (20 points)

- Operations Plan — **15 points**
- Long-Term Funding Strategy — **5 points**

3. Project Budget and Cost Effectiveness (20 points)

- Complete Budget — **10 points**
- Matching Funds — **5 points**
- Cost Effectiveness — **5 points**

4. Organizational Capacity and Technical Experience (20 points)

- Organizational Capacity — **10 points**
- Technical Experience — **10 points**

5. Performance Measures and Evaluation (15 points)

- Performance Metrics — **10 points**

- Evaluation Plan — **5 points**

7.7 Funding Recommendations and Approvals

- Following final scoring, the Selection Committee presents funding recommendations to CATS management.
- Recommended projects are submitted to the Metropolitan Transit Commission (MTC) for final approval.
- Upon MTC approval, the Program of Projects (POP) is submitted to FTA via TrAMS for federal award.

7.8 Appeals Process

- Applicants may request a debrief meeting with CATS staff to review scoring results and receive feedback.
- Funding decisions are final and not subject to formal appeal.
- Applicants are encouraged to address any deficiencies and reapply in future funding cycles.

7.9 Funding Allocation for Projects Scoring Above 70 Points

- For details on project scoring, please see Appendix A.

Section 8: Application Process, Program of Projects, and Grant Award Process

8.1 Call for Projects and Application Process

Each funding cycle, CATS administers a formal **Call for Projects** to solicit Section 5310 applications from eligible subrecipients.

8.1.1 Application Platform: Bonfire

CATS utilizes the City of Charlotte's **Bonfire eProcurement platform** as the official submission system for 5310 applications. Bonfire serves as the system of record for:

- Application submission and document intake
- Secure document storage
- Applicant communication
- Scoring management and audit trail documentation

All applicants must register and submit their full application packages through Bonfire.

8.1.2 Application Package Requirements

Applications must include:

- Documentation of subrecipient eligibility
- Project description and justification narrative
- Statement of alignment with the Coordinated Public Transit-Human Services Transportation Plan (CPT-HSTP)
- Service area and target population served
- Complete project budget:
    - Total project cost
    - Federal share request
    - Local match commitment with supporting documentation
- Organizational capacity narrative and staffing plan
- Performance measures and program evaluation plan
- Certifications and Assurances (C&A)
- Conflict of interest disclosures
- Procurement-related disclosures (if applicable)

CATS provides technical assistance workshops and written guidance to assist applicants each cycle.

8.2 Procurement Department Oversight and Compliance Role

The City of Charlotte's **Procurement Department** serves a critical role in ensuring procurement and contracting compliance throughout the 5310 program lifecycle.

8.2.1 Application Review Support

- Assist CATS in verifying application completeness through Bonfire.
- Confirm submission of necessary procurement documentation for any project involving:
    - Capital purchases (vehicles, equipment, technology)
    - Third-party contractors or service agreements
    - Consultants or professional services

8.2.2 Procurement Compliance

- Review proposed procurements for compliance with:
    - 2 CFR 200 (Uniform Guidance)
    - FTA Circular 4220.1F (or superseding federal guidance)
    - City of Charlotte procurement policies
- Identify and document conflicts of interest for both applicants and proposed vendors.

8.2.3 Procurement Documentation

- Maintain procurement records required for:
    - FTA triennial review
    - City of Charlotte internal audits
    - Federal or state audits
- Provide subrecipients with procurement training and technical assistance as needed.

8.3 Project Selection and MTC Approval

- After scoring and consensus review by the 5310 Selection Committee (Section 7), funding recommendations are forwarded to CATS leadership.
- A **draft Program of Projects (POP)** is created based on scoring outcomes and proportional allocation formulas.
- The draft POP is presented to the **Metropolitan Transit Commission (MTC)** for public approval.

- Upon MTC approval, projects are cleared for federal grant submission.

8.4 Post-Selection Federal Submission Process

Following MTC approval, **CATS Finance** assumes responsibility for preparing and submitting the full Section 5310 grant application package to the Federal Transit Administration (FTA).

- Finance staff complete all required data entry in the FTA Transit Award Management System (**TrAMS**), including:
    - The full Program of Projects (POP)
    - Federal share and local match documentation
    - Milestone schedules
    - Performance targets and measures
    - Certifications and Assurances (C&A)
    - Public participation documentation
    - Current Program Management Plan (PMP)
- Each funding cycle produces a new, standalone POP reflecting projects awarded through the most recent Call for Projects.
- The POP is submitted to FTA with each new grant application.

8.5 Ongoing TrAMS Maintenance and POP Updates

- In addition to submitting a new POP for each grant award cycle, **CATS Finance** maintains continuous updates to TrAMS throughout the lifecycle of each open federal award.
- Updates may include:
    - Adjustments to project budgets (if amended)
    - Project obligation dates
    - Reprogramming of unobligated balances
    - Changes in project scope
    - Quarterly Federal Financial Reports (FFR)
    - Milestone Progress Reports (MPR)
    - Project closeout information
- TrAMS serves as the official federal record of all active Section 5310 projects in the Charlotte Urban Area.

- Any POP modifications post-award require internal review and formal amendment submission to FTA.

8.6 FTA Review and Federal Award

- After submission, FTA reviews the grant application package to verify:
    - Eligibility of selected projects
    - Program compliance with federal regulations
    - Financial documentation accuracy
    - Consistency with the Coordinated Plan and public participation requirements
- If any deficiencies are identified, FTA will notify CATS Finance for correction prior to award obligation.
- Once approved, FTA issues **pre-award concurrence** and obligates federal funds for the program year.

8.7 Subrecipient Award Notification and Contract Execution

- Following FTA obligation, **Procurement initiates subrecipient award and contracting.**

8.7.1 Award Notification

- Procurement issues official award letters to all funded subrecipients, including:
    - Awarded federal funding amounts
    - Required local match amounts
    - Key program requirements
    - Next steps for contract execution

8.7.2 Contract Development and Execution

- Procurement drafts and executes subrecipient contracts, which include:
    - Scope of work and eligible activities
    - Budget summary (federal and local shares)
    - Federal flow-down clauses (FTA 9070.1H, 2 CFR 200, federal certifications)
    - Invoicing, reimbursement, and reporting obligations
    - Performance monitoring and corrective action requirements
    - Recordkeeping and audit compliance language
- All contracts are reviewed by legal counsel prior to execution.

- Contracts are executed by City officials and authorized subrecipient representatives.
- Executed contracts are maintained in Procurement's contract management system for compliance and audit purposes.

Note: Subrecipients may not incur reimbursable expenses until contracts are fully executed.

8.8 Public Participation for Program of Projects

- Public input collected during Coordinated Plan development satisfies FTA's public participation requirements for the POP.
- The Metropolitan Transit Commission (MTC) reviews and approves the POP in public meetings.
- Any additional public comments received during the POP approval process are documented and addressed prior to federal submission.

8.9 Amendments and Revisions

- Amendments to the POP may occur post-award to:
    - Add new projects
    - Modify funding levels
    - Adjust project scopes
    - Reallocate unobligated funds
- All amendments require:
    - Internal CATS review
    - MTC approval (for any funding changes

Section 9: Subrecipient Monitoring and Oversight

9.1 Overview

As the Designated Recipient for Section 5310 funds, CATS maintains full responsibility for ensuring subrecipient compliance with all Federal Transit Administration (FTA), federal, state, and local requirements. CATS implements a highly structured and proactive monitoring system that:

- Verifies proper use of federal funds
- Continuously monitors program and financial performance
- Identifies and resolves deficiencies early
- Provides technical assistance and corrective action when needed
- Maintains full compliance with all federal regulations

This oversight system fully implements FTA Circular 9070.1H, 2 CFR 200 (Uniform Guidance), and City of Charlotte financial controls.

Note: While FTA Circular 9070.1H permits flexibility in oversight frequency, CATS exceeds federal requirements by conducting **quarterly site visits** for all active subrecipients, ensuring continuous oversight and early issue detection.

9.2 Invoicing and Reimbursement Process

CATS reimburses subrecipients on a **cost-reimbursement basis only**. No advance payments are permitted.

9.2.1 Invoicing Frequency

- Subrecipients may submit invoices at any time after eligible costs are incurred.
- Invoices may be submitted on a rolling basis.
- Subrecipients are strongly encouraged to invoice regularly (monthly or quarterly) to promote consistent cash flow.
- All invoicing must be completed before final project closeout deadlines.

9.2.2 Required Invoice Documentation All invoices must be supported by system-generated reports, including checks, purchase orders, and bank-cleared payments. CATS may request additional documentation, which must be submitted within 5 business days.

Each invoice package must include:

Invoice Summary:

- Federal share requested
- Local match expended
- Total reimbursement request

Detailed Expenditure Report:

- Line-item costs by approved budget category
- Service dates

Supporting Documentation:

- Vendor invoices
- Proof of payment (cancelled checks, ACH confirmations, bank statements)
- Timesheets and payroll records (for labor charges)
- Vehicle purchase receipts, titles, and registrations (for capital purchases)
- Mileage logs or service logs (if applicable)
- Procurement files for third-party contracts:
    - Solicitations
    - Bid evaluations
    - Award documentation
    - Debarment certifications

Match Documentation:

- Proof of local match contributions
- In-kind match records (if applicable)

9.2.3 Invoice Submission and Review Workflow

Step 1 – Submission to Program Manager and CoCAP

- Subrecipients submit full invoice packages directly to:
    - CATS Program Manager (5310 Program Lead)
- The Program Manager performs initial programmatic review:
    - Verifies activity eligibility

    - Confirms documentation completeness
    - Validates consistency with approved scope of work
- Missing or incomplete invoices are returned to the subrecipient for correction prior to further routing.

Step 2 – Unity Construct Entry

- Once complete, CATS Staff uploads invoices into **Unity Construct**, CATS' centralized invoice management system.
- The Requestor initiates the Unity Construct workflow:
    - Assigns appropriate reviewers
    - Records invoice details (award number, project code, funding source)
    - Establishes full audit trail with timestamped entries

Step 3 – Routing Through Unity Construct

- Unity Construct automatically routes invoices for cross-departmental review.

Department	**Review Responsibility**
Grants & Planning	Validate project eligibility and scope alignment
Procurement	Verify procurement compliance (2 CFR 200, FTA 4220.1F, City rules)
Civil Rights	Confirm Title VI, ADA, DBE, EEO compliance
Finance (Pre-Award Finance Team)	Verify financial accuracy, match documentation, proof of payment

- Each department may request clarifications or additional documentation prior to approval.
- Invoices proceed only after clearance.

Step 4 – Workday Financial System (Effective July 1, 2025)

- Fully approved invoices move into **Workday**, the City's financial management system.
- Workday serves as the official system of financial record for:
    - Encumbrance verification
    - Budget authorization
    - Payment approval

Step 5 – Payment Disbursement

- Once fully authorized in Workday, invoices are disbursed through the City's payment system.
- Subrecipients receive notice of payment issuance.

9.2.4 Audit Trail and Documentation

At every stage of invoice processing, records are retained to create a full audit trail:

- Invoice package files
- Program Manager initial reviews
- Unity Construct logs
- e-Builder approval records
- Workday payment authorizations
- Disbursement confirmations

This documentation provides full defensibility for FTA Triennial Review, federal financial audits, and internal City audits.

9.3 Site Visits

CATS conducts formal site visits **quarterly for all subrecipients**, integrating both financial and programmatic monitoring during each visit.

9.3.1 Quarterly Site Visit Model

Each quarterly site visit includes:

Financial Monitoring

- Review of:
    - Financial ledgers for 5310 funds
    - General ledger and expense tracking systems
    - Match fund documentation
    - Payroll records and timesheets (if applicable)
    - Procurement files for capital and contracted services
    - Supporting documentation for all submitted invoices

Programmatic Monitoring

- Review of:
    - Trip logs and schedules
    - Vehicle utilization data (mileage, service hours)
    - Passenger trip counts and denials
    - Complaint logs and resolution tracking
    - Title VI compliance files
    - ADA reasonable modification policies
    - Driver training and certifications
    - Vehicle condition inspections (if applicable)
    - ADA accessibility equipment
    - Maintenance logs and inspection records

Subrecipients are expected to provide all requested financial, operational, and compliance documentation during these visits.

- CATS will provide written notice of site visits at least **30 days in advance** of each quarter's scheduled review.

9.5 Quarterly Performance Monitoring & Reporting

Performance reports are required quarterly and submitted in addition to quarterly site visits.

9.5.1 Reporting Deadlines

Reporting Quarter	Due Date
January – March	April 30
April – June	July 31
July – September	October 31
October – December	January 31

9.5.2 Required Report Contents

- Total passenger trips
- Denials and cancellations

- Revenue miles and hours
- Vehicle utilization reports
- Client demographic data (age, disability, geography)
- Complaint and incident logs
- Any major service interruptions

Performance reports fulfill both internal CATS monitoring and federal reporting requirements under 9070.1H.

9.6 Corrective Action Process

When deficiencies are identified:

Corrective Action Notice (CAN):
CATS issues a formal written CAN outlining the deficiency, required corrective actions, and deadlines.

Corrective Action Plan (CAP):
The subrecipient submits a written CAP describing specific corrective measures and completion timelines.

Ongoing Monitoring:
CATS monitors implementation of corrective actions and provides technical assistance as needed.

Failure to resolve deficiencies may result in:

- Invoicing holds
- Funding suspension
- De-obligation of funds
- Termination of contract

9.7 Closeout Process

At project or contract completion:

- Subrecipients submit:
    - Final invoice
    - Final performance report
    - Updated property inventory (if applicable)
    - Certification of full expenditure of federal and match funds

Section 10: Financial Management

10.1 Overview

CATS maintains full financial responsibility for all Section 5310 funds awarded to the Charlotte Urbanized Area. The City of Charlotte (as fiscal agent for CATS) maintains strict internal financial controls to ensure:

- Full compliance with FTA Circular 9070.1H
- Full compliance with 2 CFR 200 (Uniform Guidance)
- Proper stewardship of federal funds
- Complete separation of grant funds from other City funds
- Comprehensive audit trail for all financial transactions

10.2 Federal Drawdown Procedures (ECHO)

CATS draws down federal 5310 funds through FTA's **Electronic Clearing House Operation (ECHO)** system.

- Drawdowns are processed only after:
    - Subrecipient invoices have been fully reviewed and approved (per Section 9)
    - Documentation has been validated in Unity Construct and Workday
    - Workday payment files reflect the exact federal/local split for reimbursement
- Federal funds are drawn on a reimbursement basis for actual expenses incurred, never in advance.
- The drawdown request in ECHO includes:
    - Amount requested
    - Grant number
    - Budget activity line items (ALIs)
    - Match certification
- Each drawdown transaction is documented and retained as part of the federal grant file.

10.3 Internal Financial Controls

CATS, in partnership with the City of Charlotte Finance Department, maintains layered financial controls over 5310 program funds:

- **Segregation of Duties:** Multiple departments are involved in financial approvals (Grants, Finance, Procurement, Civil Rights).

- **Multi-System Review:** Invoices pass through Unity Construct and Workday before payment.
- **Pre-Payment Review:** All financial documentation is fully reviewed prior to federal drawdown.
- **Payment Authorization:** Only fully approved invoices may proceed to Workday disbursement.
- **Independent Finance Oversight:** Workday and City Finance staff independently validate all budget availability prior to fund disbursement.

10.4 Accounting System

- All Section 5310 federal awards are maintained as standalone grant funds within the City's Workday financial system.
- Each federal grant award has:
    - Unique grant identifiers
    - Unique project IDs
    - Segregated fund codes
    - Restricted use accounts
- Federal funds, local match, and subrecipient reimbursements are fully traceable within the City's general ledger.

10.5 Local Match Tracking

- Local match contributions are documented by:
    - Subrecipient invoices showing local match applied
    - Backup documentation for in-kind or cash match
    - Workday records showing proper federal/local allocation
- CATS verifies that match contributions:
    - Meet federal eligibility
    - Are applied only to allowable expenses
    - Are not double-counted across programs
- Match verification occurs at both the invoice review stage and the quarterly site visits (see Section 9).

10.6 Budget Monitoring and Reconciliation

- CATS Grants and Finance staff monitor 5310 budgets continuously throughout the life of each award.
- Regular reconciliations ensure:
    - Federal funds are drawn correctly
    - Budget activity lines remain consistent with approved projects
    - Subrecipient expenses align with funding authorizations
    - Drawdowns in ECHO match Workday expenditures
- Finance staff conduct quarterly reconciliations between Workday and ECHO balances.
- Any grant revisions, scope changes, or budget reallocations are coordinated with FTA through TrAMS grant amendments.

10.7 Financial Reporting to FTA

- CATS submits:
    - **Federal Financial Reports (FFRs)**
    - **Milestone Progress Reports (MPRs)**
    - **Annual Certifications & Assurances**
- Reporting is completed in TrAMS on a quarterly and annual basis in compliance with FTA requirements.
- Subrecipient quarterly reports serve as source data for CATS' federal reporting.

10.8 Financial Audit Compliance

- CATS maintains complete financial records for:
    - FTA Triennial Reviews
    - Independent audits
    - Federal oversight reviews
    - Internal City audits
- Audit files include:
    - ECHO drawdown confirmations
    - Workday transaction reports
    - Invoice files with documentation
    - Unity Construct approval logs

- Subrecipient financial and performance reports
- Site visit documentation

10.9 Preventing Misuse of Funds

- CATS follows strict financial policies to prevent:
  - Improper charges
  - Use of federal funds for ineligible expenses
  - Commingling of funds
  - Duplicate reimbursements
  - Overpayments to subrecipients
- Any potential misuse of funds is immediately investigated, documented, and, if necessary, reported to FTA.
- CATS provides ongoing training to all staff and subrecipients to ensure continued compliance with federal financial requirements.

10.10 Record Retention

- All financial records related to Section 5310 grants are retained for **three (3) years following final federal closeout**.
- Records include:
  - Grant applications and POPs
  - Workday financial transactions
  - ECHO drawdowns
  - Subrecipient invoices and payments
  - Audit reports and reconciliations
  - Monitoring and site visit documentation

Section 11: Civil Rights and Other Federal Compliance

11.1 Overview

As the Designated Recipient for Section 5310 funds, CATS and all subrecipients must comply with all applicable federal civil rights and nondiscrimination laws, as required by:

- FTA Circular 9070.1H
- 49 U.S.C. 5332 (FTA's civil rights statute)
- Title VI of the Civil Rights Act of 1964
- Americans with Disabilities Act of 1990 (ADA)
- Disadvantaged Business Enterprise (DBE) Program
- Equal Employment Opportunity (EEO)
- Limited English Proficiency (LEP) guidance
- Other federal nondiscrimination requirements

CATS maintains an active monitoring role to ensure full subrecipient compliance with these federal requirements throughout the life of each 5310 grant.

11.2 Title VI Compliance

CATS maintains a fully approved **Title VI Program**, which applies to its own operations and oversight of subrecipients.

CATS Responsibilities:

- Maintain current Title VI plan and update every 3 years per FTA requirements.
- Submit plan to FTA for approval.
- Ensure subrecipients acknowledge Title VI obligations within their subrecipient agreements.

Subrecipient Responsibilities:

- Submit signed Title VI Assurances as part of their application package.
- Maintain complaint procedures for Title VI complaints.
- Post required public notices of nondiscrimination.
- Cooperate with CATS monitoring and reporting requests.
- Provide language assistance services to Limited English Proficiency (LEP) populations when applicable.

CATS reviews subrecipient Title VI compliance during quarterly site visits.

11.3 Americans with Disabilities Act (ADA)

Both CATS and all 5310 subrecipients are subject to ADA requirements:

- Ensure accessibility of all vehicles and facilities funded with Section 5310 funds.
- Maintain ADA-compliant lift, securement, and ramp equipment.
- Train drivers on ADA securement procedures and sensitivity.
- Make reasonable modifications to policies and practices to accommodate individuals with disabilities.
- Maintain maintenance records for ADA-related equipment.
- Ensure paratransit service complies with ADA service equivalency requirements where applicable.

CATS verifies ADA compliance at every quarterly site visit.

11.4 Disadvantaged Business Enterprise (DBE) Program

While Section 5310 funds generally do not trigger DBE goal setting (due to limited contracting activity), CATS complies with:

- DBE certification under 49 CFR Part 26.
- DBE reporting requirements as applicable.
- DBE participation is encouraged for any contracting opportunities.
- Subrecipients must maintain procurement records to verify DBE solicitation when applicable.
- CATS reviews DBE compliance as part of its procurement oversight.

11.5 Equal Employment Opportunity (EEO)

As a City of Charlotte agency, CATS operates under the City's approved EEO program.

- Subrecipients are required to comply with applicable EEO laws and regulations.
- Larger subrecipients may be required to maintain their own formal EEO Program depending on workforce size and grant size thresholds.
- CATS monitors EEO compliance through quarterly site visits and subrecipient agreements.

11.6 Drug & Alcohol Testing (If Applicable)

- Generally, most 5310 subrecipients are **not** subject to FTA's drug and alcohol testing requirements unless:
    - They operate vehicles that require a CDL
    - They operate under contract with a recipient of 5307 funds
- CATS verifies applicability for each subrecipient annually.
- Subrecipients subject to drug & alcohol rules must comply with 49 CFR Part 655, including:
    - Testing policies
    - Employee education
    - Testing records
    - Substance abuse professional referrals

11.7 Federal Certifications and Assurances

CATS collects and maintains required annual **Certifications and Assurances** from both:

- The City of Charlotte (Designated Recipient)
- All subrecipients

These include assurances related to:

- Lobbying restrictions
- Debarment and suspension
- Buy America (if applicable)
- Procurement integrity
- Civil rights compliance
- Political activity restrictions (Hatch Act)

Certifications and Assurances are signed electronically through FTA's TrAMS system annually, and retained in the grant file.

11.8 Procurement Standards

CATS and subrecipients must comply with all procurement standards established under:

- 2 CFR 200 (Uniform Guidance)
- FTA Circular 4220.1F (or any superseding guidance)

- City of Charlotte procurement policy (for City purchases)
- CATS' specific federal procurement training provided to subrecipients

Subrecipients must maintain full procurement files for all 5310-funded procurements, which are reviewed during invoice reviews and quarterly site visits.

11.9 Suspension and Debarment

All subrecipients and contractors must certify that neither they nor their principals are:

- Debarred
- Suspended
- Proposed for debarment
- Declared ineligible to receive federal funds

Verification of debarment status is conducted through:

- Signed certifications in the application package
- Checks against the federal SAM.gov system during procurement and contracting

11.10 Program Accessibility

CATS ensures that all program materials, applications, and public notices are made available in accessible formats upon request, including:

- Alternative formats for individuals with disabilities
- LEP language assistance services
- Accessible digital platforms (for web-based information)

11.11 Monitoring Subrecipient Civil Rights Compliance

CATS monitors subrecipient civil rights compliance through:

- Review of application materials
- Quarterly site visits (financial + programmatic)
- Procurement file reviews
- Ongoing technical assistance
- Subrecipient contract language requiring compliance

Deficiencies identified during monitoring may result in corrective action or suspension of funding if unresolved.

Section 12: Program Management Plan Updates and Revisions

12.1 Purpose of the PMP

The Program Management Plan (PMP) serves as the official governing document for CATS' administration of Section 5310 funds for the Charlotte Urbanized Area.

- It establishes CATS' official policies, procedures, and internal controls for program administration.
- It serves as both an internal operations guide and a formal record for FTA compliance reviews.
- It reflects the requirements of FTA Circular 9070.1H, 2 CFR 200, applicable federal guidance, and City of Charlotte financial and administrative policies.

12.2 PMP Update Requirements

CATS is responsible for keeping the PMP current and ensuring that it accurately reflects:

- Current program policies and administrative procedures
- Organizational structures and staff responsibilities
- Federal requirements and guidance
- Changes in internal financial, procurement, or monitoring systems
- FTA policy changes or new circulars
- Changes in program eligibility, subrecipient requirements, or allocation methodologies

12.3 Update Triggers

The PMP will be formally updated whenever:

- FTA releases a new 5310 Circular or updated federal guidance;
- The City of Charlotte or CATS modifies its financial, procurement, or administrative procedures that affect the 5310 program;
- New federal legislation or regulations require changes in program administration;
- Major program design changes are implemented (e.g., allocation formula changes, scoring process updates);
- Significant findings are issued during FTA Triennial Review or federal audit requiring procedural changes.

12.4 Routine Review Schedule

- CATS will conduct a formal **PMP review at least once every four (4) years**.

- Routine reviews will ensure the PMP remains accurate, relevant, and fully compliant with current federal and local requirements.
- Interim updates may occur more frequently as needed.

12.5 PMP Approval Process

- All PMP updates and revisions will be reviewed by:
    - CATS Grants Management
    - City of Charlotte Finance and Procurement
    - City of Charlotte Civil Rights Office
    - City Legal (as appropriate)
- Final PMP updates will be approved by CATS Executive Management prior to submission to FTA.
- CATS will submit updated PMP versions to FTA via TrAMS, and retain all historical versions on file for federal and internal audit records.

12.6 Distribution and Subrecipient Notification

- Subrecipients will receive written notice of any PMP revisions that affect:
    - Eligibility requirements
    - Application processes
    - Funding allocations
    - Contracting or invoicing procedures
    - Monitoring expectations
    - Civil rights or federal compliance responsibilities
- Subrecipients are required to comply with the most current approved version of the PMP at all times.

Appendix A

CATS 5310 Program Scoring Matrix with Point Allocation, Descriptions, and Evaluation Questions

Each project is evaluated out of a maximum of 100 points, distributed among five main scoring categories. Each category includes multiple subcategories with specific point allocations to ensure a comprehensive evaluation. Projects must achieve a minimum of 70 points to be considered for funding. Detailed descriptions and evaluation questions are included to clarify expectations for scoring.

1. Project Needs and Benefits (25 Points)

Project Goals and Objectives (5 Points)

Evaluation Questions:

- Does the project have clearly stated goals and objectives?
- Are the goals and objectives consistent with the purpose of the 5310 program?
- Does the project address specific needs or gaps in service as identified in the local human services transportation plan?

Scoring:

- 0 Points: Goals are vaguely stated or misaligned with 5310 program objectives. No specific need or gap is addressed.
- 1-3 Points: Goals are stated but not strongly linked to a documented need or gap in service.
- 4-5 Points: Goals are clearly stated, address documented needs, and directly align with 5310 program objectives.

Target Population Served (5 Points)

Evaluation Questions:

- Does the project serve a specific target population, such as seniors and/or individuals with disabilities?
- Does the project quantify the number of people served and the impact on the target population?

Scoring:

- 0 Points: Project serves a general population without specific focus on seniors or individuals with disabilities.

- 1-3 Points: Project serves some seniors or individuals with disabilities, but the impact on this population is limited or unclear.
- 4-5 Points: Project clearly demonstrates a strong focus on serving seniors or individuals with disabilities and quantifies the expected number of beneficiaries.

Reduction of Barriers (5 Points)

Evaluation Questions:

- Does the project reduce barriers to transportation for seniors and individuals with disabilities?
- How will the project increase mobility options for the target population?

Scoring:

- 0-2 Points: Project has minimal impact on reducing barriers to transportation.
- 3-4 Points: Project moderately reduces barriers and increases mobility options but lacks detailed strategies.
- 5 Points: Project significantly reduces transportation barriers and provides a clear, detailed strategy to enhance mobility options for seniors and individuals with disabilities.

Community Impact (10 Points)

Evaluation Questions:

- Is the project addressing a unique or underserved need?
- What would happen if the project was not funded?
- Does it serve a specialized group (e.g., the blind or those with limited mobility)?

Scoring:

- 0-2 Points: The project does not address a unique or underserved need. If not funded, the impact would be minimal, and the group served is not specialized.
- 3-7 Points: The project addresses some unique or underserved needs, and not funding it would have a noticeable negative impact on a specific group.
- 8-10 Points: The project serves a highly specialized and underserved group (e.g., the blind, individuals with significant mobility challenges). If not funded, it would significantly limit access to essential services for these populations.

2. Implementation and Coordination (20 Points)

Operations Plan (15 Points)

Evaluation Questions:

- Does the applicant present a well-defined operations or capital implementation plan?
- Are implementation steps, resources, and a timeline clearly defined?
- Is the project feasible based on the provided plan?

Scoring:

- 0-3 Points: Operations plan is incomplete or poorly defined.
- 4-11 Points: Operations plan is defined but lacks clarity on resources, timeline, or key steps.
- 12-15 Points: Operations plan is comprehensive, with clear steps, resources, and a well-defined timeline, demonstrating high feasibility.

Long-Term Funding Strategy (5 Points)

Evaluation Questions:

- Is there a long-term funding strategy to sustain the project beyond the grant period?
- Are additional funding sources or strategies identified?

Scoring:

- 0 Points: No long-term funding strategy is provided.
- 1-3 Points: Long-term funding strategy is described but lacks specific steps or viable funding sources.
- 4-5 Points: Strong long-term funding strategy is provided with clear steps for obtaining additional funding beyond the grant period.

3. Project Budget and Cost Effectiveness (20 Points)

Complete Budget (10 Points)

Evaluation Questions:

- Is the budget thorough and complete?
- Are all costs accounted for and justified with supporting documentation?
- Is there a clear connection between costs and project activities?

Scoring:

- 0-3 Points: Budget is incomplete or lacks required detail.
- 4-7 Points: Budget is complete but lacks clarity or justification for certain expenditures.
- 8-10 Points: Budget is thorough, detailed, and well-justified with a clear connection between costs and project activities.

Matching Funds (5 Points)

Evaluation Questions:

- Are matching funds documented and confirmed?
- Are the sources of matching funds diverse and reliable?

Scoring:

- 0-2 Points: Matching funds are not documented or do not meet minimum requirements.
- 3-4 Points: Matching funds are documented but from a single source or not confirmed.
- 5 Points: Matching funds are fully documented, confirmed, and include diverse sources.

4. Organizational Capacity and Technical Experience (20 Points)

Organizational Capacity (10 Points)

Evaluation Questions:

- Does the applicant have a track record of managing transportation or similar projects?
- Does the applicant have an established organizational structure with sufficient staff and resources to support the project?

Scoring:

- 0-3 Points: Applicant has little or no experience managing similar projects. The organizational structure is not well-defined.
- 4-7 Points: Applicant has some experience but lacks key capacities or a track record of successful project delivery.
- 8-10 Points: Applicant has strong experience, a well-defined organizational structure, and a history of successfully managing similar projects.

Technical Experience (10 Points)

Evaluation Questions:

- Does the applicant have technical experience in providing transportation services?
- Does the applicant possess specialized skills or training to serve the target population?

Scoring:

- 0-3 Points: Applicant has limited technical experience in transportation services and does not possess specialized skills to serve the target population.
- 4-7 Points: Applicant has some technical experience or possess some specialized skills needed for the proposed project.
- 8-10 Points: Applicant demonstrates strong technical expertise and specific skills relevant to the proposed project.

5. Performance Measures and Program Evaluation (15 Points)

Performance Metrics (10 Points)

Evaluation Questions:

- Are performance metrics provided to measure project success?
- Are the metrics clear, measurable, and directly linked to the project's goals and outcomes?

Scoring:

- 0-3 Points: Performance metrics are missing or poorly defined.
- 4-7 Points: Performance metrics are defined but not directly linked to project outcomes or objectives.
- 8-10 Points: Performance metrics are clear, measurable, and directly linked to the project's goals and outcomes.

Evaluation Plan (5 Points)

Evaluation Questions:

- Does the application include an evaluation plan for monitoring and assessing project success?
- Are evaluation methods and reporting timelines clearly defined?

Scoring:

- 0-2 Points: No evaluation plan is provided, or the plan lacks detail.
- 3-4 Points: Evaluation plan is described but lacks specific evaluation methods or timing.
- 5 Points: Comprehensive evaluation plan is provided with clear methods, timelines, and reporting protocols.

Funding Requirements and Allocation Methodology

Capital and Operations Project Funding Allocation

Under the 5310 Program, 55% of the available funds must be used on capital projects. Therefore, the amount of funding allocated for operations projects is contingent on the number and quality of capital project applications. Capital projects and operations projects will be scored and awarded separately to ensure clarity and alignment with funding requirements.

Capital Projects: Capital projects must include, but are not limited to, vehicle purchases, facilities, and other large infrastructure projects that directly support enhanced mobility for seniors and individuals with disabilities.

Operations Projects: Operations projects include service expansions, new or expanded transportation options, and other operational enhancements.

Funding Allocation for Projects Scoring Above 70 Points

Initial Allocation Methodology
Based on federal guidelines, 55% of the total available funding is allocated to capital projects and up to 45% to operating projects. Projects are first evaluated within their respective categories using the standard scoring matrix. Each project receives a proportional share of its category's funding pool based on its score relative to the total points awarded within that category.

Formula for Initial Allocation:

Initial Allocation=(Project Score/Total Points Awarded in Category) ×
Total Available Funding for Category

Example Calculation:
Assume the total available funding is $1,000,000, with $550,000 allocated to capital projects and up to $450,000 allocated to operating projects. If the capital projects pool has four projects with scores of 95, 90, 85, and 80 points respectively, their initial allocations will be proportional to their percentage share of the total points (350).

Proportional Allocation and Surplus Distribution

After the initial allocations, if a project's proportional share exceeds its requested amount, the excess funds will be returned to the **reallocation pool**. These surplus funds will be redistributed to projects that did not receive their full requested funding.

Steps for Proportional Allocation and Surplus Distribution:

- **Step 1:** Calculate each project's percentage share based on its score relative to the total points awarded within its category.
- **Step 2:** Allocate initial funding proportionally based on each project's percentage share.
- **Step 3:** If a project's initial allocation is more than its requested amount, allocate only the requested amount and add the surplus to the reallocation pool.
- **Step 4:** Redistribute the surplus funds to partially funded or unfunded projects based on their percentage share relative to the total points of all partially funded or unfunded projects.

Cascading Allocation Approach

If the 55% threshold for capital projects is met but there are still unfunded or partially funded capital projects, these projects will enter a secondary competition against remaining operating projects. The cascading approach ensures that both capital and operating projects have a fair opportunity to compete for additional funding.

Steps for Cascading Allocation:

- **Step 1: Establish Unfunded or Partially Funded Projects Pool**
    - Identify capital projects that did not receive full funding and move them to the **Unfunded Capital Projects Pool**.
- **Step 2: Combine Unfunded Capital and Operating Projects for Secondary Competition**
    - Create a combined pool of unfunded capital and operating projects.
    - Calculate the total points awarded to this pool and use it as the basis for secondary allocation.
- **Step 3: Allocate Remaining Funds Using the Percentage Share**
    - Calculate each project's percentage share based on its score relative to the total points awarded in the combined pool.

- Multiply the percentage share by the remaining available funds (the reallocation pool) to determine each project's secondary allocation.

Formula for Cascading Allocation:

Secondary Allocation=(Project Score/Total Points Awarded in Combined Pool)×Remaining Avai lable Funds

Example of Cascading Allocation:

- **Initial Allocation Results:**
  - Assume the following initial allocation:

Project	**Type**	**Score**	**Requested Funding**	**Initial Allocation**	**Surplus/Unmet Need**
Project A	Capital	(95/270)=35%	$300,000	$192,500	($107,500)
Project B	Capital	(90/270)=33%	$250,000	$181,500	($68,500)
Project C	Capital	(85/270)=32%	$200,000	$176,000	($24000)

Because none of the capital projects received their full requested amount, they will move into the secondary competition for the remaining 45 percent.

Project	Type	Score	Requested Funding	Initial Allocation	Surplus/Unmet Need
Project A	Capital	(95/512)=19%	$107,500	$85,500	($22,000)
Project B	Capital	(90/512)=17%	$68,500	$76,500	$8,000
Project C	Capital	(85/512)=17%	$24,000	$76,500	$52,500
Project D	Operating	(92/512)=18%	$150,000	$81,000	($70,000)

Project E	Operating	(80/512)=15%	$300,000	$67,500	($232,500)
Project F	Operating	(70/512)=14%	$200,000	$63,000	($137,000)

Now, two projects are fully funded. The remaining projects will be scored again to see which projects get the remaining surpluses ($60,500).

Project	Type	Score	Requested Funding	Initial Allocation	Surplus/Unmet Need
Project A	Capital	(95/337)=28%	$22,000	$16,940	($5,060)
Project D	Operating	(92/337)=27%	$70,000	$16,335	($23,665)
Project E	Operating	(80/337)=24%	$232,500	$14,520	($217,980)
Project F	Operating	(70/337)=21%	$137,000	$12,705	($124,295)

After this iteration, there is no more remaining surplus funding. Here is the final funding chart:

Project	Type	Score	Requested Funding	Initial Allocation	Surplus/Unmet Need
Project A	Capital	95	$300,000	$294,940	($5,060) (98%)
Project B	**Capital**	**90**	**$250,000**	**$76,500**	**$0 (100%)**
Project C	**Capital**	**85**	**$200,000**	**$76,500**	**$0 (100%)**
Project D	Operating	92	$150,000	$97,335	($52,665) (65%)
Project E	Operating	80	$300,000	$82,020	($217,980) (27%)
Project F	Operating	70	$200,000	$75,705	($124,295) (38%)

Example Scenario

Overview:
This example illustrates how funding is allocated when capital projects are prioritized first, and

remaining operating projects are evaluated together with unfunded capital projects for a fair competition. Additionally, it demonstrates how surplus funds are redistributed and how the cascading approach works for a final allocation.

- **Total Available Funding:** $1,000,000
- **Administrative Costs (10%):** $100,000
- **Remaining Available Funding:** $900,000
- **Capital Projects Pool (55%):** $550,000
- **Combined Operating and Unfunded Capital Projects Pool:** $350,000

Step 1: Initial Allocation for Capital Projects Only

Project	Requested Funding	Score	Initial Allocation	Surplus/Unmet Need	Proportion of Total Capital Points
Project A	$200,000	95	$1936000	$6,400 Unfunded	95 / 270 = 35.2%
Project B	$250,000	90	$183,150	$66,850 Unfunded	90 / 270 = 33.3%
Project C	$300,000	85	$173,250	$126,750 Unfunded	85 / 270 = 31.5%

Total Points for Capital Projects: 95 + 90 + 85 = 270
Total Capital Funding Allocated: $550,000
Surplus Funds: None.

Step 2: Combined Pool Allocation (Unfunded Capital + Operating Projects)

After the initial allocation to capital projects, any remaining unfunded capital projects are combined with all operating projects to form a single pool competing for the remaining $350,000.

Projects Competing in the Combined Pool:

Project	Capital or Operating	Requested Funding	Score	Initial Allocation	Surplus/Unmet Need	Proportion of Total Capital Points
Project A	Capital	$6,400	95	$55,233	$48,833	15.78%
Project B	Capital	$66,850	90	$52,326	($14,524)	14.95%
Project C	Capital	$126,750	85	$49,419	($77,331)	14.12%
Project D	Operating	$150,000	92	$53,488	($96,512)	15.28%
Project E	Operating	$200,000	85	$49,419	($150,581)	14.12%
Project F	Operating	$300,000	75	$43,605	($256,395)	12.46%
Project G	Operating	$100,000	80	$46,512	($53,488)	13.29%

Step 3: Reallocation of Surplus Funds from Combined Pool

If a project receives its full requested funding or a surplus, any remaining funds from that project are returned to a **new reallocation pool**. This pool will be distributed among the partially funded projects in the combined pool using the same proportional scoring methodology.

Projects with Unmet Needs (Partially Funded) Competing for the New Reallocation Pool:

Project	Capital or Operating	Requested Funding	Score	Initial Allocation	Surplus/Unmet Need	Proportion of Total Capital Points
Project B	Capital	$14,524	90	$8,669	($5,855)	17.75%
Project C	Capital	$77,331	85	$8,187	($69,144)	16.77%

Project	Capital or Operating	Requested Funding	Score	Initial Allocation	Surplus/Unmet Need	Proportion of Total Capital Points
Project D	Operating	$96,512	92	$8,861	($87,651)	18.15%
Project E	Operating	$150,581	85	$8,187	($142,394)	16.77%
Project F	Operating	$256,395	75	$7,224	($249,171)	14.79%
Project G	Operating	$53,488	80	$7,705	($45,783)	15.78%

Final Allocation Summary with Percentage of Request Fulfilled and Project Type

Project	Capital or Operating	Requested Funding	Score	Initial Allocation	Surplus/Unmet Need	Percent Received
Project A	Capital	$200,000	95	$200,000	$40	100%

Project	Capital or Operating	Requested Funding	Score	Initial Allocation	Surplus/Unmet Need	Percent Received
Project B	Capital	$250,000	90	$244,145	($5,855)	98%
Project C	Capital	$300,000	85	$230,856	($69,144)	77%
Project D	Operating	$150,000	92	$62,349	($87,651)	42%
Project E	Operating	$200,000	85	$57,606	($142,394)	29%
Project F	Operating	$300,000	75	$50,829	($249,171)	17%
Project G	Operating	$100,000	80	$54,217	($45,783)	54%

Appendix B

CATS Section 5310 Program: Subrecipient Invoice Submission Instructions

Thank you for participating in the Section 5310 program. To ensure timely and accurate reimbursement, please follow these instructions carefully when submitting your invoice packages.

What to Include in Your Invoice Package

Each invoice submission **must** include the following items:

1. Invoice Cover Letter or Summary

- Identify your agency name, invoice number, and invoice period (start and end dates).
- Provide the total amount you are requesting for reimbursement.
- Specify the federal share and your local match amount.

2. Detailed Expense Breakdown

For each expense, include:

- Expense category (e.g., personnel, vehicle purchase, trip-based operating costs, mobility management).
- Description of the expense (e.g., "Driver wages for March 2025," "Vehicle #12 purchase," "Mileage reimbursement for 1,000 miles").
- Dates or period the expense covers.
- Amount of the expense.
- Federal and local match amounts requested.

3. Supporting Documentation for All Expenses

You **must** attach all corresponding documentation, such as:

- **Personnel costs:** Payroll records, timesheets, and employee pay stubs or payroll registers.
- **Purchased services:** Vendor invoices, contracts, and proof of payment (cancelled checks, bank statements, or electronic payment confirmations).
- **Capital purchases (vehicles, equipment):** Vendor invoices, purchase orders, proof of payment, vehicle title and registration (if applicable).
- **Mileage or trip-based expenses:** Mileage logs, trip reports, or service logs showing the date, miles or trips, and purpose.
- **Procurement documentation:** For all contracted services or purchases over procurement thresholds, provide solicitation documents, bids received, award letters, contracts, and Buy America certifications if applicable.
- **Local match:** Documentation verifying the source and amount of local match funds, including cash receipts, grant awards, or documentation of in-kind contributions.

4. Certification Statement

Include a signed certification letter or form (can be a simple signed page) from an authorized official of your agency attesting that:

- All expenses were incurred for allowable activities under the Section 5310 program.
- No costs have been previously reimbursed or claimed from other sources.
- All supporting documentation is accurate, complete, and available for audit.
- Your agency complies with all applicable federal requirements.

Submission Process

- Submit your complete invoice package **electronically** to your CATS Program Manager and CoCAP contact.
- Ensure all documents are clear, legible, and properly organized to avoid processing delays.
- If your invoice package is incomplete or missing documentation, it will be returned, which may delay reimbursement.
- Promptly respond to any requests for additional information or corrections.

Important Reminders

- You may submit invoices **at any time** during the project period once costs are incurred; however, we recommend submitting invoices **quarterly** for smoother cash flow.
- Quarterly **Performance Reports** are also required and must be current to process invoice payments.
- Retain all original documentation for **at least five (5) years** after the final grant closeout.
- Contact your CATS Program Manager with any questions or for assistance.

Appendix C

FY 2024

CALL FOR PROJECTS & GRANT APPLICATION

CHARLOTTE-MECKLENBURG
URBANIZED AREA'S

ENHANCED MOBILITY OF SENIORS AND INDIVIDUALS WITH DISABILITIES PROGRAM (SECTION 5310)

RFP

AUGUST 1, 2025

I. INTRODUCTION & BACKGROUND

In July 2012, Congress authorized a new federal transportation bill, Moving Ahead for Progress in the 21st Century (MAP-21), which consolidated two transit programs under previous legislation (Section 5310: "Transportation for Elderly Persons and Persons with Disabilities" and Section 5317: "New Freedom Program") into a single: "Enhanced Mobility of Seniors and Individuals with Disabilities" (Section 5310). The purpose of this consolidated program is to provide funds for projects that serve the special needs of transit-dependent populations when traditional public transportation services are insufficient, unavailable, or inappropriate and programs that expand the transportation options beyond those required by the Americans with Disabilities Act (ADA).

Section 5310 Designated Recipient

The City of Charlotte is the Designated Recipient for Section 5310 funds allocated by formula for the Charlotte-Mecklenburg Urban Area (Char-Meck UA). The City's public transit department, the Charlotte Area Transit System (CATS), administers the program in accordance with federal law and regulations.

This Section 5310 funding application package includes information on funding availability, project eligibility, and the application timeline, among other items.

II. ELIGIBLE PROJECTS & SUBRECIPIENTS

To be eligible for 5310 funding, projects and services must be derived from or included in a locally developed coordinated human services transportation plan. Additionally, eligible Section 5310 projects must serve the urban area where the funds were apportioned (there is either an origin or destination located within the urban boundary). The "Coordinated Transit-Human Services Transportation Plan for the Charlotte Urban Area FY2022-FY2027" can be found at Charlotte Coordinated Human Services Plan

TRADITIONAL SECTION 5310 PROJECTS. Section 5310 requires that, of the funds apportioned to a designated recipient, no less then fifty-five percent (55%) of the funds must be available for public transportation capital projects that meet the special needs of seniors and individuals with disabilities when public transportation is insufficient, unavailable, or inappropriate (Traditional 5310 Projects).

It is not sufficient that seniors and individuals with disabilities are merely included (or assumed to be included) among the people who will benefit from the Project.

1. Eligible Subrecipients for Traditional 5310 Projects:

a) **Private Non-Profit Organizations**. Subrecipients qualifying as private non-profit organizations must provide a copy of their IRS Tax Identification Number Certificate and a copy of the charter and bylaws as filed with the North Carolina Secretary of State as proof of non-profit eligibility.

b) **State or Local Governmental Authorities.** According to 49 USC § 5302, this includes a political subdivision of the state, an Indian tribe, or a public corporation, board, or commission established under state law that is:

(i) Approved by the state to coordinate services for seniors and individuals with disabilities; or

(ii) Certifies that no nonprofit corporations or associations are readily available in an area to provide the service.

2. Examples of Traditional 5310 Projects.

- Purchase of rolling stock and other capital activities for paratransit service;
- Passenger facilities related to Section 5310-funded vehicles—purchase and installation of benches, shelters and other passenger amenities;
- Related activities and support facilities and equipment for Section 5310-funded vehicles—preventive maintenance, radios and communication equipment, wheelchair lifts and securement devices, computer hardware and software, ITS, dispatch systems, and fare collection systems;
- Lease of Equipment (if more cost-effective than purchase);
- Contracted services (capital and operating included);
- Support for mobility management and coordination programs among public transit providers and human service agencies; and
- Capital activities to support ADA-complementary paratransit service.

A. OTHER SECTION 5310 PROJECTS. Up to 45 percent (45%) of a designated recipient's annual apportionment may be utilized for public transportation projects that exceed the requirements of the ADA, that improve access to fixed route service and decrease reliance by individuals with disabilities on paratransit, or that provide an alternative to public transportation that assists seniors and individuals with disabilities with transportation.

1. Eligible Subrecipients for Other 5310 Projects include the eligible subrecipients for Traditional 5310 Projects above, as well as:

(i) **Private Operators of Public Transportation.** In order to receive 5310 Program funding, these recipients must be able to document that they are, and have been providing, shared-ride service (two or more passengers in the same vehicle who are otherwise not traveling together) to the public or to special categories of users on a regular basis.

2. Examples of Other Section 5310 Projects.

a) Public transportation projects that meet the special needs of seniors and individuals with disabilities when public transportation is insufficient, unavailable or inappropriate (capital only) (see examples above)

b) Public transportation projects that exceed the requirements of the ADA (capital and operating). Examples include:
(i) Expansion of paratransit service area and/or hours;
(ii) Cost for providing same day paratransit service;

(iii) Enhanced paratransit service—providing escorts or assistance through door;
(iv) Acquisition of vehicles or equipment to accommodate mobility aids that exceed ADA dimension and load standards;
(v) Installation of additional securement locations in buses beyond what is required by the ADA; and
(vi) Accessible feeder services.

c) Public transportation projects that improve access to fixed-route service and decrease reliance on paratransit by individuals with disabilities (capital and operating). Examples include:
   (i) Accessibility improvements to transit and intermodal stations that are not key stations—accessible path to a bus stop; adding elevator, ramps, or detectable warnings; improving signage or wayfinding; technology improvements that enhance accessibility; and
   (ii) Travel training.

d) Alternatives to public transportation that assist seniors and individuals with disabilities with transportation (capital and operating). Examples include:
   (i) Purchasing vehicles to support accessible taxi, ride-sharing, or vanpooling programs—must meet regulatory requirements and permit the passenger to remain in his or her mobility device inside the vehicle;
   (ii) Administration and expenses related to voucher programs offered by human service providers. Transit passes for use on existing fixed route or ADA paratransit service are not eligible; and
   (iii) Volunteer driver and aide programs.

III. FUNDING REQUIREMENTS

A. SECTION 5310 PROGRAM LOCAL SHARE GUIDANCE

1. **General**. Section 5310 funds may be used to finance capital, operating expenses, and mobility management (MM) projects. The Federal share of eligible capital and MM costs for the Fiscal Year 2023 funds can be (80%) of the net cost of the activity, with local matching funds. The Federal share of the eligible operating costs can be (50%) of the net operating costs of the activity, with local matching funds.

   The subrecipient is responsible for securing the local matching funds for their Section 5310 project and all of its local share must be provided from sources other than Federal United States Department of Transportation (USDOT) funds. Local share requirements are flexible to encourage coordination with other federal programs that may provide transportation, such as Health and Human Services or Medicaid. **Fare revenue or user fees generated by the service to be supported by the 5310 Program grant cannot be used as matching funds**. Examples of sources that may be used to meet any or the entire local share requirement include:

   - State or local appropriations;
   - Dedicated tax revenues;
   - Private donations;

- Revenue from human service contracts;
- Net income generated from advertising and concessions;
- Income from contracts to provide human service transportation;
- Other non-USDOT Federal funds that are eligible to be expended for transportation including: employment training, community services, vocational rehabilitation services, and Temporary Assistance for Needy Families (TANF). Examples of other types of federal funding that may be available as a local match can be found at Federal Fund Braiding Guide

2. **Soft Match**. Non-cash shares such as donations, volunteer services, or in-kind contributions are eligible as long as the value of each is documented and supported, AND it is a cost that would otherwise be eligible under the 5310 Program. **Applicants that intend to use these sources are required to submit an in-kind valuation plan with their application for review and approval by the City.**

   In-kind Valuation Plan. In-kind contributions can only be used for operating and mobility management expenses. In-kind contributions are the value of non-cash contributions, received from a third party, for real property, equipment, and/or goods and services directly benefitting and specifically identifiable to the project.

   In-kind contributions must be included as project costs, and the value of the services must be documented. If your organization intends to use in-kind contributions as a match, certain conditions apply. Those conditions are:

   a) An In-kind Valuation Plan **MUST BE SUBMITTED AND APPROVED** in writing by the City prior to being used for the project.
   b) Detailed documentation must be submitted that includes, but is not limited to:
      (1) A statement from the person or organization providing the goods or services;
      (2) The value of the goods or services; and.
      (3) The goods or services must be necessary for the project.

IV. PROGRAM MEASURES AND REPORTING REQUIREMENTS

The Section 5310 Program has federally mandated reporting requirements. Subrecipients will be required to report on their project each time they make a claim for reimbursement from their funded grant. **Quarterly reports will be required regardless of financial activity**. Subrecipients will submit both quantitative and qualitative information on each of the following measures:

Traditional Section 5310 Projects

1. **Gaps in Service Filled**. Provision of transportation options that would not otherwise be available for seniors and individuals with disabilities measured in numbers of seniors and people with disabilities afforded mobility they would not have without program support as a result of traditional Section 5310 projects implemented in the current reporting year.
2. **Ridership**. Actual or estimated number of rides (as measured by one-way trips)

provided at least quarterly for individuals with disabilities and seniors, and Section 5310-supported vehicles, and services as a result of traditional Section 5310 projects implemented in the current reporting year.

Other Section 5310 Projects

1. Increases or enhancements related to geographic coverage, service quality and/or service times that impact availability of transportation service for seniors and individuals with disabilities as a result of other Section 5310 projects implemented in the current reporting year.
2. Additions or changes to physical infrastructure (e.g. transportation facilities, sidewalks, etc.), technology and vehicles that impact availability of transportation services for seniors and individuals with disabilities as a result of other Section 5310 projects implemented in the current reporting year.
3. Actual or estimated number of rides (as measured by one-way trips) provided for seniors and individuals with disabilities as a result of other Section 5310 projects implemented in the current reporting year.

SECTION 1: APPLICANT INFORMATION

Field	Response
Legal Name (Agency)	
Doing Business As (DBA) (if any)	
Address	
City, State, ZIP	
Federal Tax ID Number	
Unique Entity Identifier (UEI)	
Parent Agency UEI (if different)	
Project Manager Name & Title	
Telephone	
Email	
Project Service Area (County/Counties)	
Organization Type (check one)	[ ] Local Government Authority [ ] Private Non-Profit Organization [ ] Public Transportation Operator [ ] Private Operator of Public Transportation

SECTION 2: ORGANIZATIONAL OVERVIEW

1. **Mission Statement:**
   (Limit: 500 words)

2. **Services Currently Provided to Seniors/Individuals with Disabilities:**
   (Limit: 500 words)

3. **Experience Managing Similar Projects:**
   (List up to 3 examples – Limit: 500 words total)
   - Project 1:
   - Project 2:
   - Project 3:

4. **Staff and Resources Available for this Project:**
   (Limit: 500 words)

SECTION 3: PROJECT NARRATIVE

Project Title	
Project Type	[ ] Traditional 5310 [ ] Other 5310
Total Funding Requested	$
Scope of Services	*(Limit: 500 words)*

1. **Brief Project Description:**
   (Limit: 500 words)

2. **Target Population:**
   Estimated number of seniors and/or individuals with disabilities served: ___
   Total population with unmet transit needs in service area: ___

3. **Demographics and Geography:**
   (Limit: 500 words – include key demographic indicators. Cite sources.)

4. **Coordination and Partnerships:**

5. **Timeline and Milestones:**
   Please list up to 5 key milestones and their anticipated dates.

Milestone Description	Anticipated Completion Date	Responsible Party

6. **Sustainability Plan:**
   (Limit: 500 words – describe how the service will continue post-grant)

7. **Alignment with CPT-HSTP:**
   (Limit: 500 words – list relevant strategies and your response)

8. **Scalability:**
   (Limit: 500 words – describe how the project could be adjusted if partially funded)

SECTION 4: PERFORMANCE & EVALUATION

Indicator	How Will It Be Measured	Frequency
One-way trips provided	Dispatch/Trip logs	Quarterly
Denials or missed trips	Operations data	Monthly
Customer satisfaction	Survey or feedback forms	Annually
Equipment or vehicle usage	Mileage logs or GPS data	Quarterly

Briefly describe how you will collect and track the above data.
Will your system allow for system-generated reporting (e.g., Excel, Trapeze, etc.)? *(Limit: 500 words)*

SECTION 5: BUDGET SUMMARY

Capital/Operating/Mobility Management Budget Table (Example Template)

Use the example format below to break down your proposed budget by line item. You may add rows as needed to reflect your project costs. This is only a template.

Expense Category	Total Cost	Federal Share	Local Match	Match Type (Cash/In-Kind)	Notes/Description
Vehicle Purchase					
Driver Salaries					
Fuel & Maintenance					
Contracted Services					
Mobility Management Staff					
Other (specify)					
TOTAL					

Provide a detailed justification for each category (Limit: 500 words per category):

- Describe the costs included and why they are necessary.
- Explain how local match will be provided, including sources.
- If match is in-kind, attach a valuation method or documentation.
- Note any other grants or funding that complement this budget.

SECTION 6: REQUIRED ATTACHMENTS CHECKLIST

Please confirm the following are included:

1. **Title VI Plan** – Your agency's current nondiscrimination policy.
2. **Organizational Chart** – Include all departments and the location of the proposed project within the structure.
3. **Key Personnel Resumes** – Include resumes for individuals directly managing the proposed project.
4. **Lobbying Certification** – Certification that no federal funds will be used for lobbying purposes.
5. **Conflict of Interest Statement** – Statement disclosing any potential or actual conflicts.
6. **Disclosure Form for Lobbying** – Required only if lobbying activities are occurring.
7. **Local Share Certification Form** – Signed form documenting the sources and amounts of non-federal match.
8. **Project Milestone Table** – A completed table outlining key milestones with dates and responsible parties.
9. **Vehicle Inventory or Capital Asset List (if applicable)** – Include if applying for capital funds, or if your agency owns 5310-funded assets.

SECTION 7: SYNOPSIS (EXECUTIVE SUMMARY)

Complete this last and limit to one page.

1. What is the title of your project?
2. How much money are you requesting and how will it be used?
3. What is the main deliverable?
4. How will the project be sustained?
5. Is the project scalable?
6. How would the project change if less funding is awarded?
7. Include your top 3–5 milestones or tasks with dates.

Submit completed applications electronically by **October 15, 2025 at 2:00 PM** to:
Beverly Hovis – City Procurement Division
Beverly.Hovis@charlottenc.gov

Early submittals are encouraged. Incomplete applications will not be reviewed.

A. APPLICANT CONTACTS

Provide the name, title, address, phone/fax number, and e-mail for the following key contact people for the Project:

1. Executive Director/Chairman of the Board

2. Administrative Contact (person responsible for grant administration)

3. Operations Contact (person responsible for operational issues)

4. Procurement Contact (person responsible for procuring assets and preparing bid packages)

5. Financial Contact (person responsible for billing, accounting, closeouts, reimbursement requests)

6. Audits Contact (responsible for annual audits)

7. Legal Counsel

8. EEO Representatives – An Applicant's Chief Executive Officer (CEO) should designate an EEO Officer and adequate staff to administer the EEO program. The EEO Officer should be an executive and should report directly to the CEO. Care should be taken to avoid conflicts when assigning responsibility for administering the EEO program as a collateral duty assignment, e.g., a personnel officer may have a conflict of interest.

9. DBE Representative

10. ADA Representative

11. Title VI Representative

B. DOCUMENTS AND RECORDKEEPING

Indicate where the following program records will be retained and provide the name of the individual responsible for maintaining documents.

Document	Location	Name and Title of Responsible Individual
Contract w/ City		
Contract w/ Service Provider		
Civil Rights Records (EEO, Title VI, ADA)		
Financial Records		
Procurement and Bid Documents (Including RFPs)		
Certificates and Assurances		
Others (List)		
Capital Projects		
Vehicle Records		
Non-Vehicle Records		
Transportation Service Projects		
Driver Manifests		
Daily Pre-Trip Forms		
Maintenance Records		
Drug and Alcohol Records		
Ridership Records		

C. PROJECT PERSONNEL

1. **List all positions, names, titles and the number of positions, which will be charged to this grant during the grant period**. Next to each position indicate the percentage of the position/individual salary that will be charged to the grant.

2. For positions that will only be PARTIALLY charged to this grant, describe how the estimated percentage of the salary to be charged to the grant was derived. If percentage of time to be charged to grant is estimated, describe what auditable mechanism(s) will be used to verify the actual time that an individual spends on grant related activities.

3. Are all individuals listed in item 1 above currently working in their job titles? If not, explain what the differences are between their current positions and the position that will be charged to the grant and why they are not working in their grant positions.

4. Attach to this exhibit an official organizational chart showing the reporting/supervisory relationships of each of the positions listed above.

D. THIRD PARTY CONTRACTING

If an applicant is planning to purchase any goods or capital assets from a third party, it must follow the applicable competitive process required by the FTA. If the applicant is planning to contract out service under this grant, then the applicant must list all proposed service to be contracted out (i.e., transportation services, computer routed services, dispatching, auditing, drug and alcohol testing, legal, marketing, maintenance) to a third party. All bids/RFP/contract awards must have prior CATS review and approval**. A price/cost analysis must be done by the applicant prior to request. See FTA Third Party Contracting Guidelines Circular FTA C 4220.1F.**

Bid/RFP/State Contract	**Name/Type of Asset/Service**	**Timeframe**	**Estimated Cost/Budget**

E. SECTION 5310 TITLE VI PROGRAM REPORT

Legal Name of Applicant: _____

(Complete either Part A or Part B)

Part A – No complaints or Lawsuits Filed

I certify that to the best of my knowledge, **No complaints or lawsuits** alleging discrimination have been filed against *(Transit System Name)* _____ during the period July 1, 2023 through June 30, 2024.

_____ _____

Signature of Authorized Official **Date**

_____

Type Name and Title of Authorized Official

Part B – Complaints or Lawsuits Filed

I certify that to the best of my knowledge, the below described complaints or lawsuits alleging discrimination have been filed against *(Transit System Name)* _____ during the period July 1, 2023 through June 30, 2024.

Complainant Name/Address/Telephone Number	Date	Description	Status/Outcome

(Attach an additional page if required.)

_____ _____

Signature of Authorized Official **Date**

_____

Name and Title of Authorized Official

Please provide a copy of your current Title VI Plan with your Application.

F. SECTION 5310 LOCAL SHARE CERTIFICATION FOR FUNDING

(This form is required for **EACH** separate funding request)

_____

(Legal Name of Applicant)

Local matching funds are optional for application submittals for Fiscal Year 2023. Please list any anticipated Capital and Operating Local matching funds below.

The local match must be provided from sources other than federal Department of Transportation funds. Guidance is provided in Article III above about eligible sources of matching funds. Applicants are responsible for verifying the eligibility of non-USDOT federal funds the applicant proposes to use as their local match.

Requested Funding Amounts

	Net Project Cost	**Local Share**	**Local Source(s)**
Capital (Vehicles & Other)	**$** _____	**$** _____ **(% of net)**	1. _____ 2. _____ 3. _____
Operating	**$** _____	**$** _____ **(% of net)**	1. _____ 2. _____ 3. _____
TOTAL	**$** _____	**$** _____	

I, the undersigned representing *(Legal Name of Applicant)* _____ do hereby certify to the City of Charlotte, that the required local funds will be available as of **July 1, 2026.**

_____
Signature of Authorized Official

_____
Name and Title of Authorized Official

_____
Date

G. LOBBYING CERTIFICATION

The undersigned certifies, to the best of his or her knowledge and belief, that:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence a member of the Metropolitan Transit Commission, Charlotte City Council, officer or employee of the Charlotte Area Transit System, or any elected, appointed, or employed official or employee of the State of North Carolina, member of Congress, an officer or employee of Congress, or an employee of a member of Congress in connection with the awarding of any Federal Contract, or the amendment or modification of any Federal Contract.

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence a member of the Metropolitan Transit Commission, Charlotte City Council, officer or employee of the Charlotte Area Transit System, a member of Congress, an officer or employee of Congress, or an employee of a member of Congress in connection with this Federal Contract, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying", in accordance with its instructions.

3. The undersigned shall require that the language of this certification be included in the award of all subcontracts anticipated to be of a value of one hundred thousand dollars ($100,000.00) or more and that all subcontractors shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by 31 U.S.C. §1352. Any person who fails to file the required certification shall be subject to a civil penalty of not less than ten thousand dollars ($10,000.00) and not more than one hundred thousand dollars ($100,000.00) for each such failure.

Signature:_____ Date:_____

Title:_____ Telephone No. (___) _____

Firm or Corporate Name:_____

Address:

_____

DISCLOSURE FORM TO REPORT LOBBYING

DISCLOSURE OF LOBBYING ACTIVITIES Complete this form to disclose lobbying activities pursuant to 31 U.S.C. §1352 (See below for public burden disclosure)	Approved by OMB 0348-0046

1. Type of Federal Action:	**2. Status of Federal Action:**	**3. Report Type:**
[ ] a. Contract b. Grant c. Cooperative agreement d. Loan e. Loan guarantee f. Loan insurance	[ ] a. Bid/offer/application b. Initial award c. Post-award	[ ] a. Initial filing b. Material change **For Material Change Only:** year_____ quarter date of last report

4. Name and Address of Reporting Entity: [ ] Prime [ ] Subawardee Tier_____, if known: Congressional District, *if known*:	5. If Reporting Entity in No. 4 is Subawardee, Enter Name and Address of Prime: Congressional District, *if known*:
6. Federal Department/Agency:	**7. Federal Program Name/Description:** CFDA Number *if applicable:*
8. Federal Action Number, *if known*:	**9. Award Amount,** *if known:*
10. a. Name and address of Lobbying Entity *(if individual, last name, first name, MI):*	**b. Individuals Performing Services** *(including address if different from No. 10a)* *(last name, first name, MI):*

(attach Continuation Sheet(s) SF-LLL-A, if necessary)

11. Amount of Payment *(check all that apply):* $_____ [ ] actual [ ] planned	**13. Type of Payment** *(check all that apply):* [ ] a. retainer [ ] b. one-time fee [ ] c. commission [ ] d. contingent fee [ ] e. deferred [ ] f. other; specify:
12. Form of Payment *(check all that apply):* [ ] a. cash [ ] b. in-kind; specify: nature_____ value	

14. Brief Description of Services Performed or to be Performed and Date(s) of service, including officer(s), employee(s), or Members contacted, for Payment Indicated in Item 11:

(attach Continuation Sheet(s) SF-LLL-A, if necessary)

15. Continuation Sheet(s) SF-LLL-A attached: [ ] Yes [ ] No

16. Information requested through this form is authorized by 31 U.S.C. §1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. §1352. This information will be reported to the Congress semiannually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than $10,000.00 and not more than $100,000.00 for each such failure.	Signature: Print Name: Title: Telephone No.:_____ Date:
Federal Use Only:	Authorized for Local Reproduction Standard Form-LLL

INSTRUCTIONS FOR COMPLETION OF SF-LLL, DISCLOSURE OF LOBBYING ACTIVITIES

This disclosure form shall be completed by the reporting entity, whether subawardee or prime Federal recipient, at the initiation or receipt of a covered Federal Action, or a material change to a previous filling, pursuant to the 31 U.S.C. §1352. The filing of a form is required for each payment or agreement to make payment to any lobbying entity for influencing or attempting to influence and officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with a covered Federal action. Use the SF-LLL-A Continuation Sheet for additional information if the space on the form is inadequate. Complete all items that apply for both the initial filing and material change report. Refer to the implementing guidance published by the Office of Management and Budget for additional information.

1. Identify the type of covered Federal action for which lobbying activity is an/or has been secured to influence the outcome of a covered Federal action.
2. Identify the status of the covered Federal action.
3. Identify the appropriate classification of this report. If this is a follow-up report caused by a material change to the information previously reported, enter the year and quarter in which the change occurred. Enter the date of the last previously submitted report by this reporting entity for this covered Federal action.
4. Enter the full name, address, city, state and zip code of the reporting entity. Include Congressional District, if known. Check the appropriate classification of the reporting entity that designates if it is, or expects to be, a prime or sub award recipient. Identify the tier of the subawardee, e.g., the first subawardee of the prime is the 1st tier. Subawards include but are not limited to subcontracts, subgrants and Contract awards under grants.
5. If the organization filing the report in item 4 checks "Subawardee", then enter the full name, address, city, state and zip code of the prime Federal recipient. Include Congressional District, if known.
6. Enter the name of the Federal agency making the award or loan commitment. Include at least one organizational level below agency name, if known. For example, Department of Transportation, United States Coast Guard.
7. Enter the Federal program name or description for the covered Federal action (item 1). If known, enter the full Catalog of Federal Domestic Assistance (CFDA) number for grants, cooperative agreements, loan, and loan commitments.
8. Enter the most appropriate Federal Identifying number available for the Federal action identified in Item 1 (e.g., Request for Proposal (RFP) number; Invitation for Bid (IFB) number; grant announcement number; the Contract, grant, or loan award number; the application/proposal control number assigned by the Federal agency). Include prefixes, e.g., "RFP-DE-90-001."
9. For a covered Federal action where there has been an award or loan commitment by the Federal agency, enter the Federal amount of the award/loan commitment for the prime entity identified in item 4 or 5.
    a. Enter the full name, address, city, state and zip code of the lobbying entity engaged by the reporting entity identified in item 4 to influence the covered Federal action.
    b. Enter the full names of the individual(s) performing services, and include full address if different from 10(a). Enter Last Name, First Name, and Middle Initial (MI).

10. Enter the amount of compensation paid or reasonably expected to be paid by the reporting entity (item 4) to the lobbying entity (Item 10). Indicate whether the payment has been made (actual) or will be made (pleased). Check all boxes that apply. If this is a material change report, enter the cumulated amount of payment made or planned to be made.
11. Check the appropriate box(es). Check all boxes that apply. If payment is made through an in-kind contribution, specify the nature and value of the in-kind payment.
12. Check the appropriate box(es) that apply. If other, specify nature.
13. Provide a specific and detailed description of the services that the lobbyist has performed, or will be expected to perform, and the date(s) of any services rendered. Include all preparatory and related activity, not just time spent in actual contact with Federal officials. Identify the Federal official(s) or employee(s) contacted or the officer(s), employee(s), or Member(s) of Congress that were contacted.
14. Check whether or not a SF-LLL-A Continuation Sheet(s) is attached.
15. The certifying officer shall sign and date the form, print his/her name, title, and telephone number.

Public reporting burden for this collection of information is estimated to average thirty (30) minutes per response including time for reviewing instructions, searching existing date sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

Send comments regarding the burden estimate or any aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget. Paperwork Reduction Project (0348-0046), Washington, D.C. 20503.

H. CONFLICT OF INTEREST

Except as may be identified and explained below, the undersigned hereby certifies that, no member of the Charlotte City Council, Mecklenburg Board of County Commissioners, Metropolitan Transit Commission, officer, employee, or former employee of the City, AND

no elected, appointed, or employed official or employee of the State of North Carolina or of a governing body, instrumentality, or political subdivision within the territory comprising Mecklenburg County, AND

no relative of persons described above, AND

no member of or delegate to the Congress of the United States

has an interest whatsoever (regardless of how indirect and how remote that interest may be) in the Bidder's organization and/or in the proceeds of any contract and/or agreement which might be made between the Bidder and the City as result of the successful bid/proposal accompanied by this certification; no person who is or who during the past twelve (12) months has been a member of the Charlotte City Council, Mecklenburg Board of County Commissioners, Metropolitan Transit Commission, an officer or employee of the City is employed by or on behalf of the Bidder's organization; and that until acceptance of all work or services to be performed under any resulting contract or agreement, the Bidder shall not enter into any contract involving services or property, whether or not related to the performance of any resulting contract or agreement, with any of the aforementioned persons or with any business in which any such person has an interest, direct or indirect.

Except as identified and explained below and with City's prior approval the Bidder shall not engage in any activity, or accept any employment, interest or contribution that would create an appearance of a conflict of interest (personal or organizational) or reasonably appear to compromise the Bidder's judgment with respect to all work or services to be performed under any resulting contract or agreement.

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The undersigned certifies that he is legally authorized by the Bidder to make the above representation, and that the representation is true to the best of his knowledge and belief and without deliberate omission of any inquiry which would to the best of his belief tend to change the above representation. The undersigned understands that any representation made knowing it to be false may be cause to disqualify the Bidder from competing for award for the contract at hand, may be cause to terminate the resulting contract and disqualify the Bidder from being awarded future contracts by the City.

The Bidder certifies that neither he nor any agent, representative, or other party acting on his behalf has offered or given any gratuity or gratuities, in the form of gifts, entertainment, or otherwise, to any director, officer, or employee of the City or of any person, firm, consultant or contractor retained by the City, with a view to securing the contract or of securing favorable treatment with respect to the award hereof, and the Bidder further certifies that neither he nor any agent, representative, or other party acting on his behalf will offer or give any such gratuity to any director, officer, or

employee of the City or of any such consultant or contractor with a view to securing favorable treatment with respect to any change or amendment to the contract, or to any other action with respect to the performance hereof.

The Bidder further understands that in addition to submitting this certification at the time of bid/proposal submission to the City, the Bidder shall also be required to submit a similar certification at the time of execution of any resulting contract.

NOTE: THIS CERTIFICATION MUST BE SIGNED AND SUBMITTED WITH THE BID/PROPOSAL

Signature: _____

Title: _____ Date of Signing: _____

Firm or Corporate Name: _____

Address: _____

_____

Telephone Number: _____

I. CHECKLIST FOR SUBMITTING PROPOSAL

Step 1 – Read the document fully

Step 2 Proposal Copies

- An electronic Application to be delivered, to City Procurement Division, Attention: Beverly Hovis at beverly.hovis@charlottenc.gov.

It is the Subrecipient's responsibility to check the City's Contract Opportunities Site for any addenda or changes to this Project. Search for 5310 FY24 Call for Projects Grant Application to find any documents or changes have been posted.