

Agency: \_\_\_\_\_

Agency Representative Name: \_\_\_\_\_

Agency Contact Information: \_\_\_\_\_

Address: \_\_\_\_\_

Phone: \_\_\_\_\_

Email: \_\_\_\_\_

## **Compliance Review for Nebraska 5311 Subrecipient Onsite Review Checklist**

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

Email: \_\_\_\_\_

Phone: \_\_\_\_\_

Date of Site Visit: \_\_\_\_\_

Site Visit No.: \_\_\_\_\_

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## Introduction

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## Introduction

The Nebraska Department of Transportation is required to provide oversight and technical assistance to subrecipients of funding from the Federal Transit Administration. Subrecipient site visits are conducted at least once every three years as per the NDOT Transit Section State Management Plan.

Documentation will be requested before the site visit. Please forward all requested information by the deadline provided. Documents will also be reviewed onsite. Please ensure that all documents to be reviewed are readily available during the visit.

This checklist will be utilized by the reviewer during your visit. Please answer ALL questions on the checklist and return to the reviewer with the required documents by the due date.

After the review, a follow-up report will be issued. The subrecipient will be required to take corrective action to address all findings.

# Required Documents

Documents will be reviewed prior to the site visit and during the on-site review. Please ensure that the required documents are provided by the due date or available during the review. Use the checklist below to ensure the required documents are provided as needed.

Send these documents with the completed checklist by the due date:

1. Rider handbook or passenger policies.
2. Reasonable modification/accommodation rule adopted by the agency.
3. Reasonable modification/accommodation rule complaint form template.
4. All reasonable modification/accommodation complaint forms submitted to the agency.
5. Maintenance plan adopted by the agency.
6. Preventive maintenance (PM) schedules for FTA-funded vehicles (maximum of schedules for 10 vehicles is sufficient.) Provide active forms that indicate PM is scheduled and completed as required.
7. Invoices, mechanic inspection sheets, etc., that provide evidence that the correct maintenance is being performed at the correct intervals.
8. Copies of titles for FTA-funded vehicles.
9. Copies of completed pre- or post-trip inspections.
10. Copies of completed documents that indicate lifts are being cycled (disregard if this action is part of the pre- or post-trip inspection.)

These records must be available during the on-site review:

1. Title VI documents (plan, posters, compliant form, etc.)
2. EEO poster
3. Transit accounting document
4. Driver training records
5. Marketing materials
6. Passenger handbook and/other written policies
7. Drug and alcohol testing compliance records
8. Procurement policies
9. Maintenance records for all transit vehicles
10. ADA policy, complaint form and complaint log

## Section 1: Eligibility

1.	Are all transit services provided by the agency open to the general public? _____		
If not, please describe in detail. _____			
Agency Response:	_____		
NDOT Comment:	_____		
<input type="checkbox"/> Previous Finding	<input type="checkbox"/> Recommendation	<input type="checkbox"/> Finding	<input type="checkbox"/> Resolved onsite

2.	How are services advertised to the general public? _____		
Agency Response: _____			
NDOT Comment: _____			
<input type="checkbox"/> Previous Finding	<input type="checkbox"/> Recommendation	<input type="checkbox"/> Finding	<input type="checkbox"/> Resolved onsite

3.	Are all vehicles providing service as part of the public transit program marked with the agency name and contact information on both sides?	_____	
Agency Response: _____			
NDOT Comment: _____			
<input type="checkbox"/> Previous Finding	<input type="checkbox"/> Recommendation	<input type="checkbox"/> Finding	<input type="checkbox"/> Resolved onsite

4.	Describe any "incidental" services (e.g., meal delivery) provided using Federally-funded vehicle? _____		
Agency Response: _____			
NDOT Comment: _____			
<input type="checkbox"/> Previous Finding	<input type="checkbox"/> Recommendation	<input type="checkbox"/> Finding	<input type="checkbox"/> Resolved onsite

4a.	Does the incidental service disrupt regular public transportation service?	_____
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

4b.	Is the incidental services funded by a different program?	_____
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

5.	Does the public transportation system transport children to school?	_____
If yes, please describe the service provided. _____		
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

6.	Does the agency ever allow exclusive use of the transit vehicle (i.e., charter service)?	_____
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

## Section 2: Civil Rights

1.	Is the Title VI Notice to the Public posted?	_____
If so, where?		_____
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

2.	Are Title VI Complaint forms and complaint procedures available in the transit office?	_____
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

3.	Are Title VI complaint forms and complaint procedures available in each Federally-funded vehicle?	_____
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

4.	Are Title VI Notice to the Public posters located in every Federally-funded vehicle?	_____
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

5.	Are required EEO posters displayed at transit agency office, contractors' offices, transit garage, etc.?	_____
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

### Section 3: Financial

1.	Does the agency's accounting system track all revenues and expenses attributable to the public transit program?	_____
Agency Response: _____		
NDOT Comment: _____		
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>
<input type="checkbox"/>	Recommendation	<input type="checkbox"/>
<input type="checkbox"/>	Finding	<input type="checkbox"/>
<input type="checkbox"/>	Resolved onsite	

2.	How are these revenues and expenses clearly identified as being related to the public transit program?	_____
Agency Response: _____		
NDOT Comment: _____		
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>
<input type="checkbox"/>	Recommendation	<input type="checkbox"/>
<input type="checkbox"/>	Finding	<input type="checkbox"/>
<input type="checkbox"/>	Resolved onsite	

3.	How does the agency ensure that the fully-allocated costs of providing incidental services are covered by other than state or federal transit funds?	_____
Agency Response: _____		
NDOT Comment: _____		
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>
<input type="checkbox"/>	Recommendation	<input type="checkbox"/>
<input type="checkbox"/>	Finding	<input type="checkbox"/>
<input type="checkbox"/>	Resolved onsite	

4.	How does the agency ensure that state and federal transit funds are spent only on costs attributable to the public transit program?	_____
Agency Response: _____		
NDOT Comment: _____		
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>
<input type="checkbox"/>	Recommendation	<input type="checkbox"/>
<input type="checkbox"/>	Finding	<input type="checkbox"/>
<input type="checkbox"/>	Resolved onsite	

5.	Describe how fares are collected, recorded and deposited. _____						
Who in your organization is responsible for handling fares from collection to deposit? _____							
Agency Response:		_____					
NDOT Comment:		_____					
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>	Recommendation	<input type="checkbox"/>	Finding	<input type="checkbox"/>	Resolved onsite



### Section 4: General ADA

1.	Are ADA services' needs met with the current fleet?	_____
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

2.	Are wheelchairs accepted in all of the agency's service areas?	_____
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

3.	Does the agency require that wheelchairs be secured?	_____
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

4.	Will the agency still transport if driver is not able to secure wheelchair?	_____
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

5.	What types of "service animals" are accepted aboard vehicles and in facilities?	
		_____
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

6.	How does the agency determine if an animal is a "service animal"?						_____
Agency Response:		_____					
NDOT Comment:		_____					
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>	Recommendation	<input type="checkbox"/>	Finding	<input type="checkbox"/>	Resolved onsite

7.	Can a person not using a wheelchair request to ride a wheelchair lift?						_____
Agency Response:		_____					
NDOT Comment:		_____					
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>	Recommendation	<input type="checkbox"/>	Finding	<input type="checkbox"/>	Resolved onsite

8.	Have all drivers been trained to use the wheelchair lifts/ramps and the wheelchair securement system(s)?						_____
Agency Response:		_____					
NDOT Comment:		_____					
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>	Recommendation	<input type="checkbox"/>	Finding	<input type="checkbox"/>	Resolved onsite

9.	Does all literature/advertising include information that all services are open to the general public, including persons with disabilities?						_____
Agency Response:		_____					
NDOT Comment:		_____					
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>	Recommendation	<input type="checkbox"/>	Finding	<input type="checkbox"/>	Resolved onsite

10.	How does the agency handle a caller who requests a ride at a time when the transit vehicle(s) is/are busy? _____						
Agency Response:		_____					
NDOT Comment:		_____					
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>	Recommendation	<input type="checkbox"/>	Finding	<input type="checkbox"/>	Resolved onsite

11.	Does the agency have a suspension policy for a pattern or practice of no shows? _____					_____	
Agency Response:		_____					
NDOT Comment:		_____					
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>	Recommendation	<input type="checkbox"/>	Finding	<input type="checkbox"/>	Resolved onsite

12.	On the average, how many denials does the agency have per month? _____						
Does the agency track the reasons for denials?			_____				
Agency Response:		_____					
NDOT Comment:		_____					
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>	Recommendation	<input type="checkbox"/>	Finding	<input type="checkbox"/>	Resolved onsite

13.	How long does/would such a denial of service last? _____					_____	
Agency Response:		_____					
NDOT Comment:		_____					
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>	Recommendation	<input type="checkbox"/>	Finding	<input type="checkbox"/>	Resolved onsite

14.	Who makes the decision on denial of service? _____						
Agency Response:		_____					
NDOT Comment:		_____					
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>	Recommendation	<input type="checkbox"/>	Finding	<input type="checkbox"/>	Resolved onsite

15.	What opportunity for appeal or administrative review is offered? _____						
Agency Response:	_____						
NDOT Comment:	_____						
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>	Recommendation	<input type="checkbox"/>	Finding	<input type="checkbox"/>	Resolved onsite

16.	How are the agency's policies on denial of service documents and communicated to the public? _____						
Agency Response:	_____						
NDOT Comment:	_____						
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>	Recommendation	<input type="checkbox"/>	Finding	<input type="checkbox"/>	Resolved onsite

17.	Does the agency have a "rider's handbook" describing the agency's policies and procedures relating to the ADA paratransit services?	_____					
Agency Response:	_____						
NDOT Comment:	_____						
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>	Recommendation	<input type="checkbox"/>	Finding	<input type="checkbox"/>	Resolved onsite

18.	Does the agency have a written policy to comply with the reasonable modification/accommodation rule?	_____					
Agency Response:	_____						
NDOT Comment:	_____						
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>	Recommendation	<input type="checkbox"/>	Finding	<input type="checkbox"/>	Resolved onsite

19.	Does the agency have a complaint form for passengers to request a modification of service?	_____					
Agency Response:	_____						
NDOT Comment:	_____						
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>	Recommendation	<input type="checkbox"/>	Finding	<input type="checkbox"/>	Resolved onsite

20.	Who at the agency is designated to receive and review the complaint forms? _____						
Agency Response:		_____					
NDOT Comment:		_____					
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>	Recommendation	<input type="checkbox"/>	Finding	<input type="checkbox"/>	Resolved onsite

21.	Does the agency have an approved ADA policy, ADA complaint form, and complaint log?					_____	
Agency Response:		_____					
NDOT Comment:		_____					
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>	Recommendation	<input type="checkbox"/>	Finding	<input type="checkbox"/>	Resolved onsite

22.	Who is designated to review ADA complaints? _____						
Agency Response:		_____					
NDOT Comment:		_____					
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>	Recommendation	<input type="checkbox"/>	Finding	<input type="checkbox"/>	Resolved onsite

### Section 5: Drug and Alcohol

1.	Is the agency drug and alcohol policy and board approval on file in the transit office?	_____
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>
<input type="checkbox"/>	Recommendation	<input type="checkbox"/>
<input type="checkbox"/>	Finding	<input type="checkbox"/>
<input type="checkbox"/>	Resolved onsite	

2.	Does the agency have documentation that each employee has received a copy of the testing policy?	_____
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>
<input type="checkbox"/>	Recommendation	<input type="checkbox"/>
<input type="checkbox"/>	Finding	<input type="checkbox"/>
<input type="checkbox"/>	Resolved onsite	

3.	Does the agency keep a record of employees selected for random testing and whether the tests were actually conducted?	_____
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>
<input type="checkbox"/>	Recommendation	<input type="checkbox"/>
<input type="checkbox"/>	Finding	<input type="checkbox"/>
<input type="checkbox"/>	Resolved onsite	

4.	Are employee test records/results kept in a separate file cabinet with lock?	_____
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>
<input type="checkbox"/>	Recommendation	<input type="checkbox"/>
<input type="checkbox"/>	Finding	<input type="checkbox"/>
<input type="checkbox"/>	Resolved onsite	

5.	Who has access to these records/results? _____	
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>
<input type="checkbox"/>	Recommendation	<input type="checkbox"/>
<input type="checkbox"/>	Finding	<input type="checkbox"/>
<input type="checkbox"/>	Resolved onsite	

6.	Who makes the decision whether to send driver and/or others for collection following an accident that triggers an automatic test? _____						
Agency Response:		_____					
NDOT Comment:		_____					
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>	Recommendation	<input type="checkbox"/>	Finding	<input type="checkbox"/>	Resolved onsite

7.	Does the agency use a form to document post-accident decisions regarding testing? _____						
Agency Response:		_____					
NDOT Comment:		_____					
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>	Recommendation	<input type="checkbox"/>	Finding	<input type="checkbox"/>	Resolved onsite

8.	Who makes the decision on whether to send an employee for reasonable suspicion testing? _____						
Agency Response:		_____					
NDOT Comment:		_____					
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>	Recommendation	<input type="checkbox"/>	Finding	<input type="checkbox"/>	Resolved onsite

9.	Does the agency have a form to document determination of reasonable suspicion? _____						
Agency Response:		_____					
NDOT Comment:		_____					
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>	Recommendation	<input type="checkbox"/>	Finding	<input type="checkbox"/>	Resolved onsite

### Section 6: Procurement

1.	Have any items charged to the public transit program, over the past three years, been purchased from businesses owned by board or staff members of the agency, or by members of their families?	_____
If so, please explain how a conflict of interest was avoided. _____		
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

  

2.	Does the agency maintain a record of the history of each procurement charged to the transit program?	_____
If so, what information is recorded? _____		
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

  

3.	Does the agency have a copy of NDOT's procurement manual on hand to use as a reference guide for purchases made with Federal funds?	_____
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite



## Section 7: Maintenance

*(Individual vehicle inspections and reports to be completed at site review.)*

1.	Does the agency have written maintenance plans for FTA-funded equipment?	_____
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>
<input type="checkbox"/>	Recommendation	<input type="checkbox"/>
<input type="checkbox"/>	Finding	<input type="checkbox"/>
<input type="checkbox"/>	Resolved onsite	

2.	Do the preventative maintenance schedules in the plan meet the minimums required by the manufacturer or supplier?	_____
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>
<input type="checkbox"/>	Recommendation	<input type="checkbox"/>
<input type="checkbox"/>	Finding	<input type="checkbox"/>
<input type="checkbox"/>	Resolved onsite	

3.	Are there maintenance records for each vehicle available for review?	_____
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>
<input type="checkbox"/>	Recommendation	<input type="checkbox"/>
<input type="checkbox"/>	Finding	<input type="checkbox"/>
<input type="checkbox"/>	Resolved onsite	

4.	Are the vehicle records identified by the VIN number?	_____
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>
<input type="checkbox"/>	Recommendation	<input type="checkbox"/>
<input type="checkbox"/>	Finding	<input type="checkbox"/>
<input type="checkbox"/>	Resolved onsite	

5.	Does a comparison of three preventative maintenance schedules and invoices indicate that maintenance is being completed per the subrecipient's schedule ( <i>within a 10% variance?</i> )?	_____
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/>
<input type="checkbox"/>	Recommendation	<input type="checkbox"/>
<input type="checkbox"/>	Finding	<input type="checkbox"/>
<input type="checkbox"/>	Resolved onsite	

6.	Are the titles for FTA-funded vehicles in the name of the subrecipient/applicant?	_____
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

7.	Are there written records indicating that pre-trip and/or post-trip inspections are completed?	_____
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

8.	Is there documentation that drivers cycle the lifts each day prior to the vehicle being placed in service?	_____
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

9.	Is all work required by the manufacturer's warranty provision being performed?	_____
If not, why?		_____
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

10.	Is any FTA-funded equipment under warranty?	_____
And if so, what is the process for recovering warranty claims?		_____
Agency Response:		_____
NDOT Comment:		_____
<input type="checkbox"/>	Previous Finding	<input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite