Sacramento Regional Transit District

Subrecipient and Contractor Monitoring Plan

1.0 PURPOSE

SacRT is responsible for providing a schedule of subrecipient Title VI Program submissions and is required to monitor subrecipients for compliance with their Title VI Programs and Section 5307 requirements. When a subrecipient is also a direct recipient of FTA funds, then that entity reports directly to FTA and SacRT is not responsible for monitoring compliance of that subrecipient.

SacRT is also required to ensure its contractors adhere to Title VI requirements, which prohibit discrimination based on race, color, or national origin. As such, SacRT has developed a monitoring process for all subrecipients and contractors.

SacRT passes through federal funds from FTA to eight subrecipient agencies, four of which are also direct FTA recipients and therefore report federal compliance activities directly to FTA. In accordance with SacRT's annual certifications and assurances, SacRT monitors subrecipient compliance with applicable federal rules and regulations, including Title VI for non-direct FTA recipients, and Section 5307 for all recipients.

As of August 2025, SacRT has two contractors that provide supplemental transportation services on behalf of the agency.

To ensure that SacRT and its subrecipients and contractors are following Title VI and Section 5307 requirements, SacRT's Planning department has developed a Subrecipient and Contractor Monitoring Plan to assist in proper monitoring of these areas. The plan directs monitoring steps, including information about:

- Tracking and recording subrecipient status
- Use of checklist forms and templates
- Analyzing and documenting findings
- Monitoring frequency

2.0 PROCESS

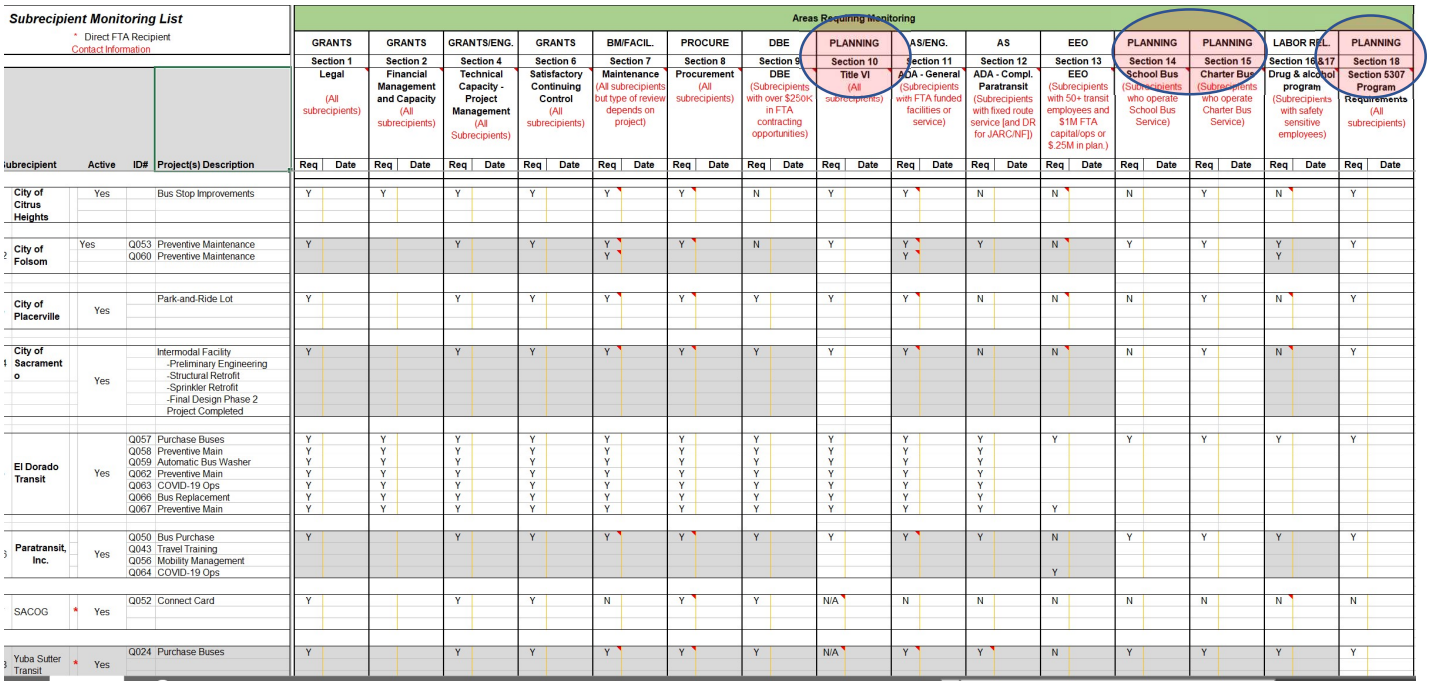
New subrecipient and contractor information is provided upon the execution of a subrecipient agreement or contract agreement with SacRT Grants division. Grants staff will communicate with Planning staff of subrecipient/contractor status changes.

Grants staff maintains a 'Subrecipient/Contractor List & Status' tracking spreadsheet. This tracker includes a list of subrecipients/contractors and full program status, and it identifies which sections of monitoring applies; shown in **Figure 1**.

The tracker is shared with all divisions that are responsible for monitoring subrecipients and contractors. SacRT Planning staff are responsible for monitoring the following sections:

- Title VI requirements
- Section 5307 requirements (partial)
- School bus service requirements
- Charter bus service requirements

Figure 1. Subrecipient/Contractor List & Status



Subrecipient Monitoring List * Direct FTA Recipient Contact Information				Areas Requiring Monitoring																							
				GRANTS		GRANTS		GRANTS/ENG.		GRANTS		BM/FACIL.		PROCURE		DBE		PLANNING		AS/ENG.		AS		EEO		PLANNING		PLANNING		LABOR REL.		PLANNING	
				Section 1		Section 2		Section 4		Section 6		Section 7		Section 8		Section 9		Section 10		Section 11		Section 12		Section 13		Section 14		Section 15		Section 16 &17		Section 18	
				Legal (All subrecipients)		Financial Management and Capacity (All subrecipients)		Technical Capacity - Project Management (All Subrecipients)		Satisfactory Continuing Control (All subrecipients)		Maintenance (All subrecipients but type of review depends on project)		Procurement (All subrecipients)		DBE (Subrecipients with over $250K in FTA contracting opportunities)		Title VI (All subrecipients)		ADA - General (Subrecipients with FTA funded facilities or service)		ADA - Compl. Paratransit (Subrecipients with fixed route service [and DR for JARC/NF])		EEO (Subrecipients with 50+ transit employees and $1M FTA capital/ops or $.25M in plan.)		School Bus (Subrecipients who operate School Bus Service)		Charter Bus (Subrecipients who operate Charter Bus Service)		Drug & alcohol program (Subrecipients with safety sensitive employees)		Section 5307 Program Requirements (All subrecipients)	
Subrecipient	Active	ID#	Project(s) Description	Req	Date	Req	Date	Req	Date	Req	Date	Req	Date	Req	Date	Req	Date	Req	Date	Req	Date	Req	Date	Req	Date	Req	Date	Req	Date	Req	Date	Req	Date
City of Citrus Heights	Yes		Bus Stop Improvements	Y		Y		Y		Y		Y		Y		N		Y		Y		N		N		Y		N		Y	
City of Folsom	Yes	Q053 Q060	Preventive Maintenance Preventive Maintenance	Y				Y		Y		Y Y		Y		N		Y		Y Y		Y		N		Y		Y		Y Y		Y	
City of Placerville	Yes		Park-and-Ride Lot	Y				Y		Y		Y		Y		Y		Y		Y		N		N		Y		N		Y	
City of Sacramento	Yes		Intermodal Facility -Preliminary Engineering -Structural Retrofit -Sprinkler Retrofit -Final Design Phase 2 Project Completed	Y				Y		Y		Y		Y		Y		Y		Y		N		N		Y		N		Y	
El Dorado Transit	Yes	Q057 Q058 Q059 Q062 Q063 Q066 Q067	Purchase Buses Preventive Main Automatic Bus Washer Preventive Main COVID-19 Ops Bus Replacement Preventive Main	Y Y Y Y Y Y Y		Y Y Y Y Y Y Y		Y Y Y Y Y Y Y		Y Y Y Y Y Y Y		Y Y Y Y Y Y Y		Y Y Y Y Y Y Y		Y Y Y Y Y Y Y		Y Y Y Y Y Y Y		Y Y Y Y Y Y Y		Y Y Y Y Y Y Y		Y		Y		Y		Y		Y	
Paratransit, Inc.	Yes	Q050 Q043 Q056 Q064	Bus Purchase Travel Training Mobility Management COVID-19 Ops	Y				Y		Y		Y		Y		Y		Y		Y		Y		N Y		Y		Y		Y		Y	
SACOG	* Yes	Q052	Connect Card	Y				Y		Y		N		Y		Y		N/A		N		N		N		N		N		N		N	
Yuba Sutter Transit	* Yes	Q024	Purchase Buses	Y				Y		Y		Y		Y		Y		N/A		Y		Y		N		Y		Y		Y		Y	

SacRT's Planning department monitors all contractors for Title VI requirements only, and partners with Grants staff to monitor Section 5307 requirements. Planning staff is responsible for making sure each subrecipient has a written, locally developed process for soliciting and considering public comments before raising a fare or carrying out a major transportation service reduction and is implementing half-fares for the elderly and disabled communities. Grants staff are responsible for making sure each subrecipient is developing, publishing, and providing the opportunity for a public hearing on a Program of Projects (POP).

2.1 Program review

Once Planning staff are alerted to a subrecipient or contractor, a full program review is conducted to ensure compliance with Title VI and Section 5307 (if applicable). Staff request program documents from each subrecipient/contractor and complete a *Title VI Program Checklist.* The checklist is a step-by-step review process that provides a record of determinations for each program or process that is monitored **(Attachment 1)**.

Staff will then document the review and findings from the checklist in the 'Subrecipient/Contractor Monitoring Record', shown in **Figure 2**. The monitoring record includes each subrecipient/contractor's status and items that need to be addressed through communication with the program coordinators.

Figure 2. Subrecipient/Contractor Monitoring Record

SUBRECIPIENT MONITORING
TITLE VI, 5307 (partial), SCHOOL BUS & CHARTER BUS

Subrecipient	Active Subrecipient	Required to Monitor	Requirement to Prepare & Submit a Title VI Program to RT every 3yrs (Ch 3 & Ch 4 requirements- if applicable)	Section 5307 Requirement for: Half-fare & Public Comment Process for Fare Increase/Major Service Reduction	School/Tripper Bus Service	Charter Bus Service	Agency/Project Notes	Findings/Compliance Notes	ACTION ITEMS
City of Folsom	Yes	*Sec. 5307	Ch 3 requirements 5.27.22-no longer receiving transit funding; no T6 monitoring required	N/A - recipient does not provide fixed-route transit service	N/A	N/A	City of Folsom transit service was annexed by SacRT in 2019; subject to Ch. 3 reqs only.	*Conducted web site check in 2019; observed online translation per LAP	Last program submitted in 2015; deficiencies found; program underwent several edits to bring the plan to compliance; final plan approved in 2017; next plan due 2020
City of Sacramento	Yes	*Title VI	Ch 3 requirements	N/A - recipient does not provide fixed-route transit service	N/A	N/A	Agency does not operate transit services. Project consists of preliminary engineering and design for structural and building improvements to an existing depot facility; including relocating/reconfiguring bus berths, vehicle and bike parking, and the light rail transit (LRT) station; refurbishing/rehabilitating the depot building; and providing passenger connection enhancements.	*Conducted site visit in 2018; observed posted Title VI notice in elevator	Last program approved in 2016; expired 2019; next update has been requested; awaiting submittal. **5.27.22-email sent to new contact, Jesse Gothan, requesting updated program; letter drafted** **Nov22- program received; findings from checklist; requested revisions to bring program to compliance**
City of Citrus Heights	Yes	*Title VI	Ch 3 requirements	N/A - recipient does not provide fixed-route transit service	N/A	N/A	Agency does not operate transit service, subject to Ch. 3 reqs only. Project is for transit enhancements to existing bus stops.	*Conducted web site check in 2019; observed Title VI complaint form online	Approved June 2021; next update due 2024
El Dorado Transit	Yes	*Title VI *Sec. 5307	Ch 3 requirements	Verified by SP 4/9/18	N/A	N/A	Does not operate 50 or more fixed route vehicles in peak service.	Areas in compliance: *Title VI *Sec. 5307	Program approved December 2019; next program due in December 2022
Yuba-Sutter Transit	Yes	*Sec. 5307	N/A - direct recipient	Verified by SP 7/19/18	N/A	N/A	YST is a direct recipient of FTA. Per Federal Register Vol. 77, No. 167 August 28, 2012 Notices page 52123 direct recipients are responsible for reporting to FTA and the primary recipient is not responsible for Title VI monitoring compliance of that subrecipient.	Areas in compliance: *Sec. 5307	
City of Elk Grove	Yes	*Sec. 5307	N/A - direct recipient	Verified by SP 7/19/18	N/A	N/A	The City of Elk Grove is a direct recipient of FTA. Per Federal Register Vol. 77, No. 167 August 28, 2012 Notices page 52123 direct recipients are responsible for reporting to FTA and the primary	Areas in compliance: *Sec. 5307	

2.2 Quarterly Monitoring-

Title VI subrecipient/contractor monitoring is included in SacRT's Strategic Plan as a quarterly milestone. Performance and tactics for monitoring efforts are reported every quarter as a Planning department metric. Each quarter, SacRT completes a 'Subrecipient/Contractor Checklist Form' **(Attachment 2)** to ensure compliance with one agency

per quarter, and records any findings into the monitoring record. Staff will then report on the monitoring activities and any findings to the division.

In addition to checklists, SacRT intends to conduct site visits as a method of monitoring subrecipients and contractors, including but not limited to public-facing office visits, and scheduling a vehicle trip on a contracted service.

3.0 COMMUNICATION

Regular contact with subrecipients and contractors is necessary to obtain the most current information, to request additional or clarifying information, or to address red flags that may need to be addressed. At least once a year, the agency contact information is verified to ensure all information is correct.

3.1 Subrecipient/Contractor Contact Schedule-

Once Planning staff has reviewed subrecipient/contractor submitted material, staff may offer assistance and recommendations to strengthen the process or Title VI Program, including corrective actions. A compliance review letter or email is issued following the completion of a review. The compliance review letter or email will provide proposed action plans to correct deficiencies. If there are no deficiencies, the review will be complete.

For regular monitoring activities and requests for information, staff follows a contact schedule shown in **Figure 3**.

Figure 3. Subrecipient/Contractor Contact Schedule

Send correspondence approximately 12 months prior to program expiration as reminder that program will be expiring. Provide expiration date and request update by due date.
Send correspondence approximately 6 months prior to expiration as a reminder that program will be expiring. Provide expiration date and request update by due date.
Send correspondence approximately 3 months prior to expiration date. Request program be submitted by due date.
Send correspondence approximately 30 days prior to expiration date. Request program be submitted by due date.

If a process or program has deficiencies, staff will draft correspondence addressing items to be corrected. If a process or program has not been received before expiration, staff will draft correspondence providing notice that federal funding may be withheld.

In addition to scheduled contact, staff will communicate with subrecipients and contractors during quarterly reviews for any issues needing resolution.

Attachment 1

TITLE VI PROGRAM CHECKLIST

Every three years, on a date determined by FTA, each recipient is required to submit the following information to the Federal Transit Administration (FTA) as part of their Title VI Program. Subrecipients shall submit the information below to their primary recipient (the entity from whom the subrecipient receives funds directly), on a schedule to be determined by the primary recipient.

General Requirements (Chapter III)

All recipients must submit:

- Title VI Notice to the Public, including a list of locations where the notice is posted Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
- Title VI Complaint Form
- List of transit-related Title VI investigations, complaints, and lawsuits
- Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
- Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance
- A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
- Primary recipients shall include a description of how the agency monitors its subrecipients for compliance with Title VI, and a schedule of subrecipient Title VI Program submissions
- A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.
- A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOT's, the appropriate governing entity is the State's Secretary of Transportation or equivalent. The approval must occur prior to submission to FTA.
- Additional information as specified in chapters IV, V, and VI, depending on whether the recipient is a transit provider, a State, or a planning entity (see below)

Requirements for Transit Providers (Chapter IV)

Requirements of States (Chapter V)

Requirements of MPOs (Chapter VI)

Attachment 2

Planning Department Procedure

Date: _____

Subrecipient Monitoring Checklist

Agency: _____

CHECKLIST – TITLE VI		**COMMENTS**
☐	Verify program is current Link to page: _____ Program expiration date: _____	
☐	Verify subrecipient contact details Name and/or Title: _____ Address: _____ Phone and Email: _____	
☐	Verify Title VI Notice Is notice posted on premises Yes ☐ No ☐ Is notice online and accessible? Yes ☐ No ☐	
☐	Verify Complaint Form Is form online and accessible? Yes ☐ No ☐	
☐	Verify Language Assistance Plan Are translations available in languages identified? Yes ☐ No ☐	
☐	Verify Public Participation Plan Have there been any public meetings? Yes ☐ No ☐ If yes, was public notice provided? Yes ☐ No ☐	
☐	Verify Equity Analyses Have there been any construction projects, service, and/or fare changes that would warrant an equity analysis? Yes ☐ No ☐ If yes, were analyses completed? Yes ☐ No ☐	
☐	**If any of these items do not meet requirements, email notice to contact listed above.**	
CHECKLIST – SCHOOL BUS AND CHARTER BUS SERVICE		**COMMENTS**
☐	Verify status of School and Charter Bus operations Operation of school bus service? Yes ☐ No ☐ Operation of charter bus service? Yes ☐ No ☐ *If yes, the following corrective action is required*_____	

CHECKLIST – SECTION 5307	**COMMENTS**
Subrecipient name:	
Program of Projects:	
Public Participation Plan for Service/Fare Changes:	
Half Fares:	