



***5310 Program
Management Plan
2015***

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FTA
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*Adopted by:
Ben Franklin Transit Board of Directors
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Introduction

Ben Franklin Transit's (BFT) program management plan (PMP) describes policies and procedures for administering the Federal Transit Administration's (FTA) Section 5310 program in the Tri-City urbanized area. Title 49 U.S.C. 5310 authorizes the formula assistance program for the Enhanced Mobility of Seniors and Individuals with Disabilities Programs and provides formula funding to BFT to improve mobility for seniors and individuals with disabilities.

FTA provides 5310 grant funds for capital and operating expenses to BFT for the following:

- Public transportation projects planned, designed, and carried out to meet the special needs of seniors and individuals with disabilities when public transportation is insufficient, inappropriate, or unavailable.
- Public transportation projects that exceed the requirements of the Americans with Disabilities Act (ADA) of 1990 (42 U.S.C. 12101 et sec.).
- Public transportation projects that improve access to fixed-route and decrease reliance on complementary paratransit.
- Alternatives to public transportation projects that assist seniors and individuals with disabilities with transportation.

Title 49 U.S.C. 5310(b) (2) provides that the amount available to states and designated recipients (BFT) not less than 55 percent shall be available for traditional Section 5310 projects. These projects must be planned, designed, and carried out to meet the special needs of seniors and individuals with disabilities when public transportation is not sufficient, available, or inappropriate.

Title 49 USC 5310(e) (2) (A) describes project selection and plan development requirements. Before receiving a grant under Section 5310, Ben Franklin Transit shall certify that:

- The projects selected by Ben Franklin Transit are locally developed and included in the Coordinated Public Transit Human Services Transportation Plan for Benton and Franklin Counties;
- The plan describes how it was developed and approved through a process that included participation by seniors, individuals with disabilities, representatives of public, private, and non-profit transportation and human services providers and other members of the public; and
- The services funded under this section will be coordinated with transportation services assisted by other Federal departments and agencies, including any transportation activities carried out by a recipient of a grant from the Department of Health and Human Services.

Title 49 USC 5310(e) (2) (B) describes allocation to subrecipients. If a recipient allocated funds received to subrecipients, the recipient shall certify that the funds are allocated on a fair and equitable basis.

Program Goals & Objectives

The mission of Ben Franklin Transit (BFT) is to provide exceptional and cost-effective transportation services that consistently exceed customer expectations while promoting the principles and practices of livable communities and sustainable development. These fundamentals correlate with the primary goal of the Section 5310 program, and as such, the goals of BFT's 5310 program are:

- To improve mobility for seniors and individuals with disabilities by removing barriers to transportation services; and
- To expand mobility options in the Tri-Cities urbanized area Appendix A.

Ben Franklin Transit utilizes the service gaps and needs identified in the Coordinated Human Services Transportation Plan (HSTP) to help with project selection, goals, future planning for 5310 funding and to identify possible subrecipients from the stakeholders who attend the HSTP stakeholder workshop. BFT supports the efforts of Benton Franklin Council of Governments (BFCG) to develop the region's HSTP in conjunction with the Washington State Department of Transportation and other stakeholders.

Ben Franklin Transit meets regularly with the Citizens Advisory Committee and Board of Directors, composed of elected government officials. Through these meetings staff can update elected officials about 5310 funding, the requirements, gaps and needs identified by the community, and eligible subrecipients and projects that could utilize 5310 funding. Through reports and recommendations at Board Committee meetings, elected officials are involved in the process and can advise staff how to proceed.

More specifically, the objectives of BFT's 5310 program are to use grant funds in a way that most effectively:

- Fosters the improvement of regional transportation services for elderly persons, persons with disabilities and people of low-income by encouraging multiple agencies or organizations to work together for this common purpose.
- Addresses gaps identified in existing public transportation services identified by stakeholders and the public.
- Reduces redundancies or duplications in regional transportation services and administration.
- Assists in implementing the recommendations established within the Coordinated Public Transit Human Services Transportation Plan.

Roles & Responsibilities and Public Participation

Ben Franklin Transit (BFT)

As the largest provider of public transit in the region, and designated recipient for Section 5310 funding, BFT will assume responsibility for the following duties regarding the administration of the Section 5310 program:

- Assisting in the project selection process for the HSTP in cooperation with BFCG and stakeholders within the community.
- Aiding in the application process for agencies seeking FTA grants for the 5310 program and performing ongoing project management.
- Developing a Program of Projects (POP).
- Ensuring adherence to Federal program guidelines for all subrecipients or contractors.
- Receiving, verifying and submitting funding from the FTA for eligible 5310 projects.
- At least 55% of 5310 funding will be passed along to eligible subrecipients meeting the conditions of traditional 5310 projects. (see page 8, Eligible Subrecipients)
- Drawing and distributing up to 10 percent of program funding for reimbursement of administration expenses incurred by BFT, decided on a project by project basis, as per Circular 9070.1G guidelines.
- Receiving financial and status reports from subrecipients.
- Completing financial and progress status reports in the FTA electronic grants management system, currently TEAM.
- Other such grant administrative actions as necessary to ensure project completion in accordance with the appropriate federal rules, regulations and circulars.
- Certify fair and equitable distribution of funds.
- Certify that projects meet the 55% minimum traditional project requirement.
- Developing and executing agreements with all subrecipients/contractors awarded funding under the Section 5310 program (see Section 16, Program Measures).
- BFT is currently responsible for selection of 5310 projects, in the future this may, but is not required to include a competitive selection process.

Ben Franklin Transit distributes 5310 funds only to qualified recipients. FTA Section 5310 project requests shall be selected based upon the listed gaps and needs identified through the HSTP process. The BFCG requested all qualified agencies or groups to apply for funding and provide specifics regarding their project. BFT worked with BFCG to solicit applications.

Ben Franklin Council of Governments (BFCG)

As the metropolitan planning organization for the Benton and Franklin counties, BFCG assumes responsibility for developing the Human Services Transportation Plan (HSTP) for Benton and Franklin Counties with the assistance of BFT and other stakeholders within the community. Ben Franklin Transit draws from HSTP identified gaps in service and potential projects as possible 5310 projects.

- An assessment of available services that identifies current transportation providers (public, private, and nonprofit);
- An assessment of transportation needs for individuals with disabilities and seniors. This assessment can be based on the experiences and perceptions of the planning partners, community, stakeholders, HSTP Committee and sophisticated data collection efforts. Examples used in this study include: trip level data provided by BFT and BFCG's Mapping of population densities by age;
- Strategies, activities, and/or projects to address the identified gaps between current services and needs, as well as opportunities to achieve efficiencies in service delivery; and
- Priorities for implementation based on resources and public input.

HSTP Advisory Committee

The Human Services Transportation Plan Advisory Committee is responsible for guidance and support in the creation of only the HSTP. The group is comprised of BFCG; BFT; Washington Department of Transportation (WSDOT); Medicaid broker; Tri-City Residential Services; Arc of Tri Cities; and People for People. The HSTP Advisory Committee is responsible for:

- Providing oversight and guidance throughout the HSTP development
- Confirming the list of prioritized unmet transportation strategies
- Reviewing and accepting project prioritization criteria
- Applying the prioritization criteria and rank grant applications submitted to WSDOT after all projects have been identified by stakeholders.

Subrecipients

Subrecipients will be required to do the following:

- Sign agreements developed by BFT for 5310 program funds. Agreements for capital projects will include scope of work for all projects. Agreements for operating assistance will outline the type of service provided and the time period covered by the agreement.
- Subrecipients will be responsible for monthly reports; further details on mandatory reporting can be found on page 16, Program Measures.

Eligible subrecipients can apply for Section 5310 activities and include State or local governmental authority, a private non-profit organization, or an operator of public transportation that receives a Section 5310 grant indirectly through Ben Franklin Transit.

Stakeholders and Applicants

Stakeholders include individuals and agencies that provide or are involved in transportation of the elderly or disabled populations, as well as advocacy groups representing the community, elderly and disabled. Applicants eligible to apply for 5310 funding include:

- Private, Nonprofit Organizations
- State or Local Government Agencies
- Public Transportation Operators
- Private Transportation Operators

The list of all stakeholders and possible applicants invited to the HSTP public meeting can be found in Appendix B.

The purpose of the meeting is to educate transportation stakeholders about the regional Human Services Transportation Plan process and the federal and state requirements, identify common origins and destinations, identify a list of service gaps or needs, and identify potential strategies or solutions to address those needs.

Administration, Planning and Technical Assistance

In the course of administering projects for subrecipients, Ben Franklin Transit may, as needed, retain up to 10 percent of the net application project amount to fund program administration costs including administration, planning and technical assistance.

Coordination

Ben Franklin Transit's 5310 program is supported through the coordinated development of the HSTP. The HSTP committee is made up of a diverse group of local agencies, non-profits and Ben Franklin Transit that plans and develops the biennial HSTP and conducts a ranking and selection of projects for the final HSTP document. The HSTP is developed by BFCG to meet the requirements of the Washington State Consolidated Grant program for WSDOT, as well as federal requirements.

BFT's involvement in the HSTP planning process is to help facilitate the involvement of community stakeholders, including non-profit human service agencies, providers of public transportation, state or local government agencies, and private sector representatives in identifying gaps and/or barriers in services for elderly and individuals with disabilities. The human services transportation community identifies projects that enhances transportation access, minimizes duplication of services, and realizes operational efficiencies through a collaborative HSTP and 5310 process.

Projects selected for Section 5310 grant funding will be selected from the priorities established in the locally developed and coordinated BFCG HSTP, this coordinated process helps to eliminate redundancy in public outreach and involvement as the same community stakeholders involved in the HSTP would also be involved with 5310 process.

Human Services Transportation Plan

BFT works closely with BFCG on the development of the HSTP. A large portion of this effort includes the development of a list of transportation improvements that would assist disabled and low income people in the area. The BFCG invited over one hundred human service agencies and non-profit organizations to participate in the process of outlining needs in this area. The list of invitees can be seen in Appendix B. These needs were prioritized in an open public meeting with all invitees participating by placing dots on their preferred projects.

BFT assists the BFCG in assembling the HSTP, in coordination with other community stakeholders. The HSTP aims to improve transportation services for persons with disabilities, older adults, and individuals with lower incomes by providing the community stakeholders a process to discuss and coordinate transportation resources.

The Benton Franklin HSTP captures stakeholder discussions, gaps in service or needs, and a framework for future planning and coordination to enhance transportation access. A diverse range of stakeholders with a common interest in human service transportation convene and collaborate on how best to provide transportation services for these targeted populations. A new HSTP is completed every four years with an update occurring every two years as needed.

Eligible Subrecipients

The following types of agencies are eligible to apply for 5310 financial assistance for a Traditional Section 5310 Project:

1. A private non-profit organization.
2. A State or local governmental authority that is approved by the State to coordinate services for seniors or individuals with disabilities or when there are no non-profit organizations readily available in an area to provide the service.
 - a. Is approved by a state to coordinate services for seniors and individuals with disabilities; or
 - b. Certifies that there are no non-profit organizations readily available in the area to provide the service.

Eligible sub-recipients would be required to follow Federal Transit Administration (FTA) procurement procedures, meet funding eligibility requirements, and deliver projects and services identified as priorities in the BFCG HSTP. Pursuant to Section 5310, only project sponsors whose projects serve the area for which the funds were apportioned are eligible to be considered as sub-recipients. (See page 6 for applicants)

Under the Federal Program MAP-21, a minimum of 55% of Enhanced Mobility of Seniors and Individuals with Disabilities program funds must be used on traditional 5310 projects – those “capital projects that are planned, designed, and carried out to meet the special needs of seniors and individuals with disabilities when public transportation is insufficient, inappropriate, or unavailable.” To meet this requirement, BFT will promote “traditional” project proposals in the HSTP update process in an effort to exceed the 55% requirement. BFT will work with community stakeholders to develop projects that meet this threshold, and utilize the coordinated selection process to ensure the 55% minimum is met or exceeded. A list of eligible projects is included below in the Program Management Plan to assist and encourage applicants to submit funding requests for traditional 5310 projects.

These capital expenses, as defined in Section 5302(3) to support the provision of transportation services to meet the special needs of elderly persons and persons with disabilities include, but are not limited to:

- Buses and Vans;
- Radios and communication equipment;
- Vehicle shelters;
- Wheelchair lifts and restraints;
- Vehicle rehabilitation; manufacture, or overhaul;
- Preventive maintenance, as defined in the National Transit Database (NTD);
- Extended warranties which do not exceed the industry standard;
- Computer hardware and software;
- Initial component installation costs;
- Vehicle procurement, testing, inspection, and acceptance costs;

- Lease of equipment when lease is more cost effective than purchase;
- Acquisition of transportation services under a contract, lease, or other arrangement. Both capital and operating costs associated with contracted service are eligible capital expenses. User-side subsidies are considered one form of eligible arrangement. Funds may be requested for contracted services covering a time period of more than one year.
- The introduction of new technology, through innovative and improved products, into public transportation;
- Transit related intelligent transportation systems (ITS); and
- Supporting new mobility management and coordination programs among public transportation providers and other human service agencies providing transportation. Mobility management is an eligible capital cost. Mobility management techniques may enhance transportation access for populations beyond those served by one agency or organization within a community. For example, a non-profit agency could receive Section 5310 funding to support the administrative costs of sharing services it provides to its own clientele with other elderly individuals and/or individuals with disabilities and coordinate usage of vehicles with other nonprofits, but not the operating costs of service. Mobility management is intended to build coordination among existing public transportation providers and other transportation service providers with the result of expanding the availability of service. Mobility management activities may include:
 - The promotion, enhancement, and facilitation of access to transportation services, including the integration and coordination of services for individuals with disabilities, older adults, and low income individuals;
 - Support for short term management activities to plan and implement coordinated services;
 - The support of State and local coordination policy bodies and councils;
 - The operation of transportation brokerages to coordinate providers, funding agencies and customers;
 - The provision of coordination services, including employer-oriented Transportation Management Organizations' and Human Service Organizations' customer-oriented travel navigator systems and neighborhood travel coordination activities such as coordinating individualized travel training and trip planning activities for customers;
 - The development and operation of one-stop transportation traveler call centers to coordinate transportation information on all travel modes and to manage eligibility requirements and arrangements for customers among supporting programs; and
 - Operational planning for the acquisition of intelligent transportation technologies to help plan and operate coordinated systems inclusive of Geographic Information Systems (GIS) mapping, Global Positioning System technology, coordinated vehicle scheduling, dispatching and monitoring technologies as well as technologies to track costs and billing in a coordinated system and single smart customer payment systems. Acquisition of technology is also eligible as a standalone capital expense.

The remaining 45% (or less) of program funds may be used by BFT for:

- Public transportation projects that exceed the requirements of the ADA;
- Public transportation projects that improve access to fixed-route service and decrease reliance by individuals with disabilities on complementary paratransit; and
- Alternatives to public transportation.

Local Share & Local Funding Requirements

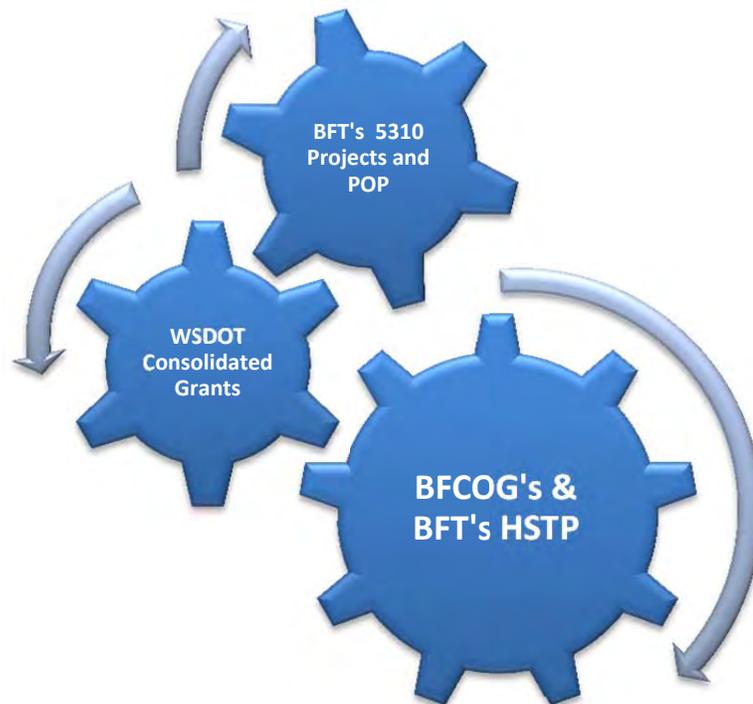
Matching funds for the Section 5310 program may be provided in cash or in-kind. In general, it is expected that any subrecipient of Section 5310 funds must be able to provide the required local matching share, 20 percent for capital projects and 50 percent for operating projects. Possible match sources include:

- State or local appropriations (WSDOT Paratransit Special Needs Non-Profit Funds);
- Other non-Department of Transportation federal funds that are eligible to be expended for transportation;
- Tax revenues;
- Private donations;
- Revenues from human service contracts;
- Net income generated from advertising and concessions through local funds (Non-FTA funded);
- Non-cash share such as donations, volunteered services, or other in-kind contributions that are eligible to be counted as a local match so long as the value of each is documented, supported, AND is a cost that would otherwise be eligible under the program; and
- Income from contracts to provide human service transportation.

BFT may elect to provide the required match using local, non-federal funds for a project that directly expands or exceeds the current capability of BFT's ADA Complementary Service in accordance with 5310 funding regulations.

Project Selection Criteria & Method of Distributing Funds

All projects selected for Section 5310 grant funding will be selected from the priorities established in the locally developed and coordinated BFCG Human Services Transportation Plan (HSTP). BFT operates all programs without regard to race, color, and national origin and with the intent of equitable distribution and oversight. BFT will ensure the equitable distribution of funds by ensuring projects selected for the Section 5310 grant program come from the HSTP. As the designated recipient of Section 5310 funds, BFT will initially consider funding project priorities from the HSTP that the agency intends to implement itself.



As part of the program, BFCG will collect proposals submitted by local stakeholders and rank the proposals for potential state funding based on how well the proposals address the priorities of the HSTP. In addition, the following criteria are also considered.

- Does the project meet a documented need?
- Is the project cost-effective?
- Is the project coordinated with other transportation and/or social service resources?
- Is there demonstrated project oversight?

Projects that are applicable to the urbanized area, that are eligible for funding under Section 5310 and that are not anticipated to be funded through the state, will be selected based on the ranking provided by BFCG and the overall funding availability.

Once a project is selected for funding, BFT will begin working with the sub-recipient on the development of the grant funding agreement, to include the development of a detailed scope of work, required deliverables and other terms and conditions. When the agreement is ready for execution, it will be presented to the BFT Board for formal award and then routed for signature by BFT and the sub-recipient. After all required signatures are received BFT will issue the subrecipient a Notice to Proceed.

Annual Program of Projects Development & Approval Process

BFT will develop the Annual Program of Projects every two years as a part of the HSTP process. The HSTP process is completed every four years and updated every two years. Eligible Section 5310 projects selected by BFT will be identified from the BFCG HSTP's gaps and needs, as described on page 4 and included in Appendix C.

The development of the BFCG HSTP, solicitation, and ranking project proposals begins in May. BFCG generally starts the HSTP public involvement and stakeholder process in August to identify gaps, needs, and proposals. BFCG will complete the proposed rankings in the October timeframe and then finalizes the process by requesting board approval in December. During this timeline BFT will utilize the HSTP identified gaps and needs to select Section 5310 projects and have time to budget them in accordance with the annual budget cycle and complete the Program of Projects. Through collaboration of the HSTP project duplication is avoided.

TIMELINE FOR DEVELOPMENT OF BENTON-FRANKLIN COUNTY HSTP

- January-March
The HSTP Advisory Committee convenes monthly throughout the HSTP process to review the prior HSTP process and schedule workshops and community meetings.
- April-June
In April, the HSTP committee begins to compile lists of stakeholders. In May, the Advisory Committee reviews and finalizes the stakeholder list. Staffing from BFT and the BFCG collaborate to discuss and map origin and destination data. During the June meeting, data collected by BFT and BFCG is compiled to be presented at future stakeholder meetings.
- July-September
HSTP Stakeholder and public meetings are held to help identify service gaps and strategies to address those gaps. A public meeting is held, and additional needs are identified and prioritized by those in attendance. A call for projects is issued in conjunction with the WSDOT formal announcement of the Consolidated Grant Process. BFT reviews potential Section 5310 projects identified from the service gaps and strategies identified.

- October – November

The HSTP committee conducts a series of meetings to prioritize projects to be submitted. Stakeholder participation is utilized to prioritize projects, and BFT will work with local applicants to identify projects WSDOT is not funding. BFT will also update Section 5310 Program of Projects and present the budget proposal to the BFT Board for approval. Additionally, BFT will develop a sub-recipient agreement with the Board's approval. With final approval by the Board of the Program of Projects, budget, and public outreach process, a notice to proceed and date will be given to the subrecipient. Monitoring of project performance as specified in the subrecipient agreement occur shortly thereafter and continue for the term of the agreement.

Administration, Planning, & Technical Assistance

Ben Franklin may utilize up to 10 percent of each annual apportionment to support program administration, planning, or technical assistance associated with the required oversight and reporting of the subrecipient relationship.

Transfer of Funds

Funds apportioned to large UZAs may not be transferred to other areas.

Private Sector Participation

BFT encourages private sector participation, specifically in the development of the HSTP. BFCG distributes notification of HSTP development and grant funding opportunities to interested stakeholders, including private sector providers, on BFCG's e-mail list. BFCG sends out press release notifications as well as notification to the larger community relating to HSTP development, project needs and project funding opportunities. The HSTP development process allows for identification of possible Section 5310 eligible projects. The HSTP process and project is considered by the BFCG Board with Board agenda and meeting materials made available on BFCG's website with notification of meetings advertised in the local media which provides an additional opportunity for private sector provider notification and participation.

BFT will maintain a page on its website <http://bft.org/fta-section-5310/>, dedicated to the Section 5310 program as a resource for the program. The website will also include copies of BFT's Program Management Plan and the BFT Program Manager.

Civil Rights

Prior to the receipt of any awarded Section 5310 funding, BFT will certify compliance with the requirements of Title VI, Equal Employment Opportunity (EEO) and Disadvantaged Business Enterprise (DBE) laws and regulations. Additionally, BFT will request copies of the required programs for each subrecipient as applicable.

Annual onsite visits will be conducted by BFT to meet with subrecipients to discuss applicable Civil Rights requirements to ensure that subrecipients are familiar with their responsibilities under the agreement and review subrecipient's continuing compliance with above Title VI, EEO, DBE, and ADA requirements. Results from the onsite visit will be included with reports to be submitted to the FTA.

Title VI

Subrecipients will be required to submit a Title VI report. This report must detail a list of all complaints or lawsuits, list of federal funding, and summary of any civil rights compliance review activities conducted by BFT. Subrecipients must also include a Limited English Proficiency Plan (LEP), Complaint Process and Procedures, and Inclusion of LEP populations, minority, and low-income population in outreach activities. The appropriate civil rights clauses will be included in contract agreements.

Disadvantaged Business Enterprise

Subrecipients must file an annual DBE activity report. This report will detail a dollar value of contracting opportunities, expenditures made to certified DBE and identification of any potential DBE firms in the area.

Equal Employment Opportunity

EEO clauses will be included in all subrecipient contracts and will be required for all third party contracts the subrecipient enters into as part of the grant project. BFT will require that any subrecipients that receive capital or operating assistance in excess of \$1 million or planning assistance in excess of \$250,000 and employ 50 or more transit-related employees must submit to BFT an EEO plan, with program updates required every three years. In addition, on a monthly basis, subrecipients will be required to report to BFT any EEO complaints received. BFT will work with subrecipient to investigate and address complaints as appropriate.

Section 504 and ADA Reporting

BFT will monitor all projects funded by Section 5310 funds for compliance with all Section 504 and ADA rules and regulations. Accordingly, all applicants will be made to certify that their respective projects comply with all applicable rules and regulations related to Section 504 and ADA. Compliance will be verified during the Section 5310 project application process.

As part of developing a contract agreement, BFT will meet with each subrecipient to review and discuss applicable Section 504 and ADA requirements to ensure that subrecipients are familiar with their responsibilities under the agreement. BFT will then ensure ongoing compliance with federal civil rights requirements in the following ways.

- ADA clauses will be included in all subrecipient contracts and required for all third party contracts the subrecipient enters into as part of the grant project.
- All subrecipients must demonstrate that any vehicle used to provide transportation services is accessible, or provide a certification of equivalence whereby accessible service can still be provided.
- Prior to BFT issuing reimbursement for expenses, the subrecipient must provide documentation of ADA accessibility as appropriate for projects such as vehicle purchases and facility construction.
- Subrecipients will be required to report to BFT any ADA complaints received. BFT will work with subrecipient to investigate and address complaints as appropriate.

Additional strategies BFT may employ in order to monitor compliance with Section 504 and ADA requirements for subrecipients may include site visits and customer surveys.

Program Measures

As the designated recipient of Section 5310 funding, BFT will collect and submit both quantitative and qualitative information for each subrecipient project as available. Program measures required will be included in a formal agreement executed between BFT and the eligible subrecipient. Included in the agreement will be submission timelines and requirements for traditional Section 5310 projects and other Section 5310 projects.

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 annually for individuals with disabilities and seniors on 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 services 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.

BFT will ensure that the above information is reported by subrecipients of Section 5310 funding for projects selected by BFT utilizing the BFCG HSTP identified gaps and needs in services. BFT may consolidate information for all projects into the annual reports for any open Section 5310 grants.

Program Management & Other Provisions

BFT will manage the Section 5310 program in full compliance with both Federal and Washington State requirements. Collaboration between FTA, BFT, and subrecipients is instrumental in implementing Section 5310 funding to ensure the best service for our communities. BFT will continue to communicate with FTA and continue to support all subrecipients from the initial application process until the project ends. Through regular communication with all subrecipients, BFT will ensure continued compliance of all FTA requirements through onsite review and continued technical support (FTA Circular 9070).

Financial Management, Accounting System Requirements & Audits

During the project planning process and in advance of any notice to proceed on Section 5310 program projects, BFT will collect applicable financial documentation to verify that there are sufficient resources to successfully complete projects. The documentation will include information regarding subrecipients' accounting systems and how subrecipients have secured the grant match requirements. If indirect expenses are being charged to the grant, BFT will confirm a federally approved cost allocation plan is being used. Subrecipients will also be required to supply BFT with a copy of any audit findings applicable to a period within the contract term. Additionally, all grant draws will be on a reimbursement basis and will not be completed until all required documentation has been received (2 CFR 200 and OMB circular A-133).

Procurement, Buy America, Pre-Award, & Post Delivery Reviews

BFT will meet with each subrecipient to ensure understanding of procurement regulations and will require appropriate documentation verifying procurement compliance prior to the issuance of any grant funds (FTA Circular 4220.1). In order to ensure compliance with federal and state procurement requirements, BFT will require subrecipients to include all applicable procurement clauses in related contracts. For subrecipients, BFT will require entities to supply copies of all subcontracts to verify that the clauses have been included and the required certifications obtained.

Subrecipients will be expected to use appropriate procurement methods when acquiring items or services with federal funds, and subrecipients will be required to supply the necessary documentation to show the methods used. In addition, subrecipients will need to provide documentation that shows compliance with provisions such as Buy America. For rolling stock purchases, subrecipients will also need to provide documentation showing that Pre-Award and Post Delivery Reviews have been completed.

Environmental

When a project is subject to environmental protection concerns, BFT will work with FTA and any subrecipients to ensure that all appropriate documentation has been filed with FTA in advance of proceeding with the project.

Restriction on Lobbying

BFT will work with its subrecipients to both educate and monitor compliance with provisions on Restrictions on Lobbying. BFT will require appropriate documentation verifying compliance in these areas prior to the issuance of grant funds.

School Bus Transportation

BFT prohibits exclusive school bus transportation. BFT will work with its subrecipients to both educate and monitor compliance provisions on school bus transportation. BFT will require appropriate documentation verifying compliance in these areas prior to the issuance of grant funds.

Drug & Alcohol Testing

BFT will work with its subrecipients to both educate and monitor compliance with provisions on drug and alcohol testing requirements. BFT will conduct regular annual (or more frequent) on-site review of drug and alcohol records. Additionally, BFT will require appropriate documentation verifying compliance in these areas prior to the issuance of grant funds.

Property Management & Vehicle Use

All property and equipment purchased with FTA funds must be used for the purpose of the program for which it was purchased for the full useful life of the property or equipment. This requirement will be identified in all subrecipient agreements. If a subrecipient is no longer able to maintain the required transit use, then BFT will work with both the subrecipient and FTA on the proper resolution. As required by FTA, BFT must maintain continuing control of FTA funded equipment for the full useful life of the equipment. To that end, BFT will retain title on all equipment funded through this program for the agreed upon useful life of the equipment. For vehicle purchases, BFT will require a copy of the vehicle registration listing BFT as the Legal Owner and the sub-recipient as the Registered Owner.

Equipment Maintenance & Disposition

FTA retains interest in all property and equipment purchased with FTA grant funds for the full useful life of the property and equipment. As such, sub-recipients will be required to certify that they are maintaining equipment purchased with FTA grant funds in a state of good repair for the full applicable useful life. Sub-recipients must also notify BFT immediately of any intention to dispose of equipment purchased with federal funds and then coordinate with BFT and FTA to follow the most current FTA Circular 5010.1 procedures for requesting equipment disposition. During the useful life of the equipment, BFT may request maintenance records from sub-recipients from time to time in order to confirm the required maintenance is being completed on the manufacturer's schedule.

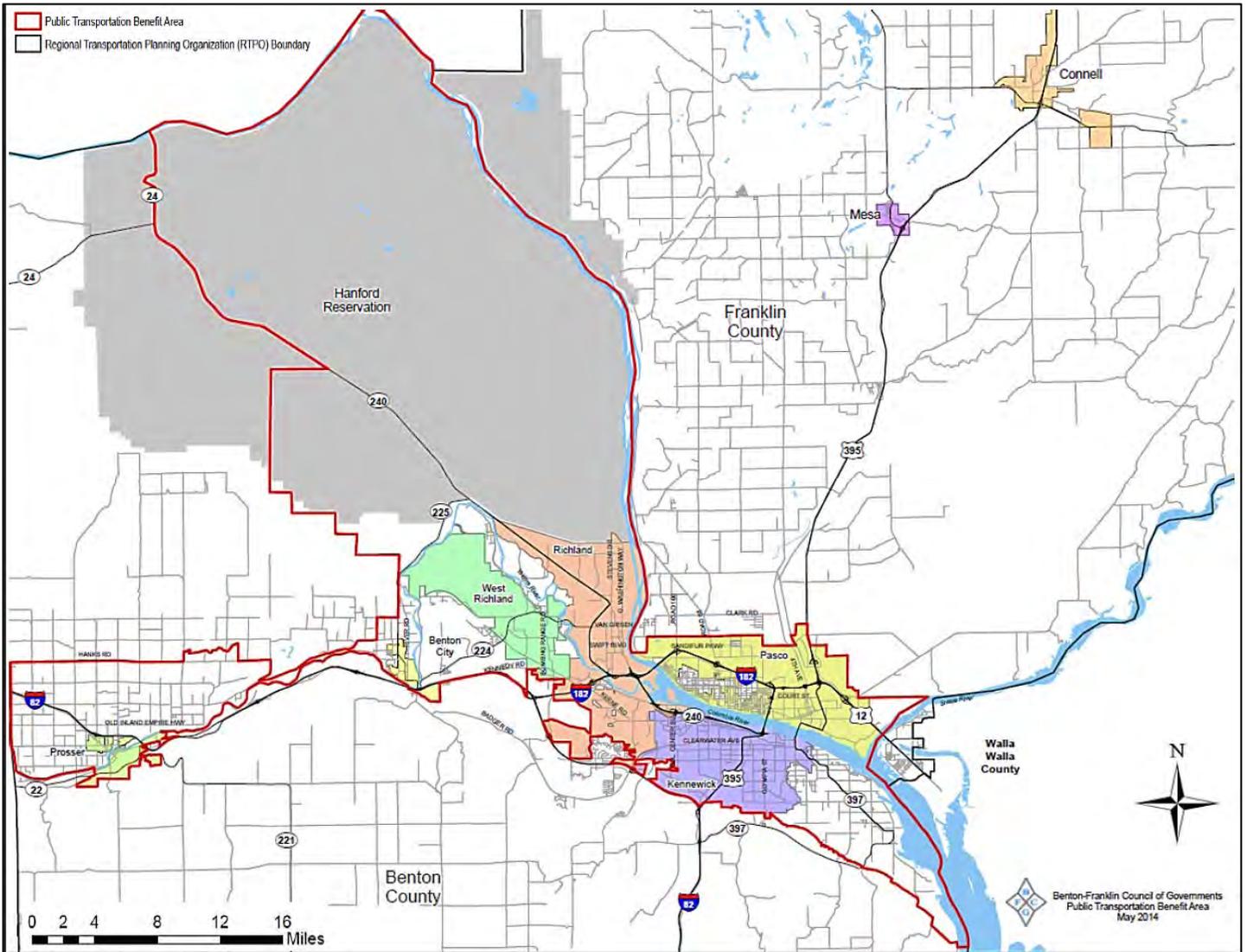
Grant Close-Out

BFT will work with subrecipients to ensure that grant milestones are met and that grants are closed in a timely fashion. Prior to any grants closing, BFT will ensure that all grant funds have been expended on eligible grant expenses and BFT has the appropriate documentation on file.

Additional Strategies

BFT may employ additional strategies in order to monitor compliance with federal requirements for both BFT and subrecipients including, but not limited to, site visits and customer surveys.

Appendix A PTBA



Appendix B Stakeholders

2014 HUMAN SERVICES TRANSPORTATION PLAN STAKEHOLDERS - BENTON, FRANKLIN COUNTIES		
ADDRESSEE	ORGANIZATION	CITY
RANDY AMMERMAN	A&A MOTOR COACH/A-1 TRANSPORTATION	YAKIMA
	A-1 TRI-CITIES TAXI	PASCO
REGINA ROMO	ADULT DAY SERVICES	KENNEWICK
DOROTHY REYNOLDS	AGING AND LONG TERM CARE	KENNEWICK
VIRGINIA JANIN	AGING AND LONG TERM CARE	KENNEWICK
LEIGH ANNE SAYER	ALTERRA	RICHLAND
DAN CRYER	ARC OF THE TRI-CITIES	RICHLAND
HOLLIE KAISER	AVALON	PASCO
BAKE, DARREN	AVALON HEALTH & REHABILITATION CENTER - PASCO	PASCO
KATHY MCMULLEN	BEN FRANKLIN TRANSIT	KENNEWICK
KATHERINE OSTROM	BEN FRANKLIN TRANSIT	RICHLAND
JUDITH GIDLEY	BENTON FRANKLIN COMMUNITY ACTION COMMITTEE	PASCO
CARRIE BAYHA	BENTON-FRANKLIN COUNTY HUMAN SERVICES DEPARTMENT	KENNEWICK
SANDY OWEN	BENTON-FRANKLIN HEALTH DISTRICT	KENNEWICK
GREG FALK	BOYS & GIRLS CLUBS OF BENTON & FRANKLIN COUNTIES	PASCO
BRENDA ARMIJO	BRENDA'S ELDERCARE	PASCO
DEBRA L. LANG-JONES	CALLAWAY GARDENS	KENNEWICK
OLELS, GARY	CANYON LAKES RESTORATIVE AND REHABILITATION CENTER	KENNEWICK
MATT JOYCE	CHENOWETH HOUSE	KENNEWICK
CHARLES POLK	COLONIAL HOUSE	KENNEWICK
PEGGY BUCHMILLER	COLUMBIA BASIN COLLEGE	PASCO
JOETTA RUPERT	COLUMBIA BASIN VETERAN'S COALITION	PASCO
STEPHANIE GUETTINGER	COLUMBIA COUNTY PUBLIC TRANSPORTATION	DAYTON
KAY HAMILTON	COLUMBIA INDUSTRIES	KENNEWICK
CLARK HEATH	COLUMBIA PHYSICAL THERAPY	PASCO
JUDITH GIDLEY	COMMUNITY ACTION CONNECTIONS	PASCO
JEANINE GORDON	CONFEDERATED TRIBES OF THE UMATILLA INDIAN RESERVATION	PENDLETON
	DAVITA MID-COLUMBIA KIDNEY CENTER	PASCO
	DEPARTMENT OF SOCIAL & HEALTH SERVICES COMMUNITY SERVICES	KENNEWICK
YOLANDA HANSEN	DESERT GRACE	RICHLAND

2014 HUMAN SERVICES TRANSPORTATION PLAN STAKEHOLDERS - BENTON, FRANKLIN COUNTIES

ADDRESSEE	ORGANIZATION	CITY
GERALD WELDON	EAGLE ASST. LIVING	RICHLAND
LARRY WEISS	EDITH BISHEL CENTER FOR THE BLIND	KENNEWICK
KING, CHARLOTTE	EMERITUS AT CANYON LAKES MANOR	KENNEWICK
ROSS, MINDY	EMERITUS AT RICHLAND GARDENS	SEATTLE
ALMA RICHWINE	ENGLISH ROSE MANOR	KENNEWICK
LIN GRANT	FINLEY SCHOOL DISTRICT	KENNEWICK
LANG JONES, DEBRA L.	FLEUR DE LIS II	KENNEWICK
SHAY, RIZAK F.	FROM THE HEART AFH ONE	PASCO
DARLENE BERNS	GARDEN AT COLUMBIA CENTER	KENNEWICK
DAN CARTER	GENIE SERVICES	WEST RICHLAND
JESSICA SCHULTZ	GOODWILL INDUSTRIES	KENNEWICK
LARRY WICKKISER	GRAPE LINE	FERNDALE
KEVIN OLESON	GRAPE LINE	WALLA WALLA
HALL, ELIZABETH D.	GUARDIAN ANGEL HOMES	RICHLAND
FRANCIS, FRANKLIN	HAWTHORNE COURT	KENNEWICK
DAVID HUGHES	HUGHES PHYSICAL THERAPY	KENNEWICK
LONA HAMMER	KENNEWICK HOUSING AUTHORITY	KENNEWICK
DON WERNER	KENNEWICK LIFE CENTER	KENNEWICK
ETHAN SCHWEBKE	KENNEWICK SCHOOL DISTRICT	KENNEWICK
MAXINE WHATTAM	KENNEWICK-SENIOR CENTER	KENNEWICK
BARB BARNES	KIONA-BENTON SCHOool DISTRICT	BENTON CITY
RICK BALLARD	LA CLINICA	PASCO
BERNADETTE MCBRIDE	LEGACY HOME	KENNEWICK
MCBRIDE, BERNADETTE M.	LEGACY HOME	KENNEWICK
SCHAULS, VIRGINIA	LIFE CARE CENTER OF KENNEWICK	KENNEWICK
CRUZ, DAISHA	LIFE CARE CENTER OF RICHLAND	RICHLAND
SYLVIA PEREZ	LIGHTHOUSE	KENNEWICK
MS. LAURA WAITE	LOURDES COUNSELING CENTER	RICHLAND
	N.W. HEARING	KENNEWICK
TINA YOUNG	PARK HILLS ADULT HOME	KENNEWICK
RANDI KINCAID	PARKVIEW ESTATES	KENNEWICK
SMITH, DEBBIE	PARKVIEW ESTATES	KENNEWICK
VINCE GUERRERO	PASCO - SENIOR CENTER	PASCO
JANA PETERSON	PASCO SCHOOL DISTRICT	PASCO
F. J. ANDERSON	PASCO/FRANKLIN CO HOUSING AUTHORITY	PASCO
GRACIE SEXTON	PEOPLE FOR PEOPLE	YAKIMA

2014 HUMAN SERVICES TRANSPORTATION PLAN STAKEHOLDERS - BENTON, FRANKLIN COUNTIES

ADDRESSEE	ORGANIZATION	CITY
	PERSONAL PHYSICAL THERAPY	RICHLAND
HAZEL POTTS	PIONEER HOME	RICHLAND
KAISER, HOLLIE	PRESTIGE ASSISTED LIVING AT RICHLAND	RICHLAND
BILL PETERSEN	PROSSER SCHOOL DISTRICT	PROSSER
HELEN CARRELL	PROSSER SENIOR CITIZEN CENTER	PROSSER
TAMMIE TAYLOR	QUAIL HOLLOW	RICHLAND
HERVEY, JAMES	QUAIL HOLLOW MEMORY CARE COMMUNITY	SEATTLE
KIM COOK	RAD CAB	KENNEWICK
	RESCARE HOMECARE OF WASHINGTON	KENNEWICK
	RESCARE HOMECARE OF WASHINGTON	KENNEWICK
MARILYN HODGSON	RICHLAND - SENIOR CENTER	RICHLAND
MINDY ROSS	RICHLAND GARDENS	RICHLAND
PEGGY BROWN	RICHLAND HOUSING AUTHORITY	RICHLAND
JEFFERSON HENSON	RICHLAND LIFE CENTER	RICHLAND
KAISER, HOLLIE	RICHLAND REHABILITATION CENTER	RICHLAND
CINDY ESKELI	RICHLAND SCHOOL DISTRICT	RICHLAND
BILLINGSLEY, JANET	RIVERTON RETIREMENT & ASSISTED LIVING COMMUNITY	SALEM
BECCA CHRISTENSEN	RIVERTON RETIREMENT AND ASSISTED LIVING	RICHLAND
SHIRLEY LONG	ROSETTA	KENNEWICK
BOBBIE ZAVALA	ROSETTA	RICHLAND
TEAL, JANA	ROSETTA ASSISTED LIVING, FISHER	KENNEWICK
TEAL, JANA	ROSETTA ASSISTED LIVING, FISHER	EAGLE
DARILEEN MANUS	ROYAL COLUMBIAN RETIREMENT INN	KENNEWICK
OGILVIE, ROBERT D.	ROYAL COLUMBIAN RETIREMENT INN	KENNEWICK
HOLLENBACK, LUZVILLA	RUAN'S GARDEN	KENNEWICK
SHELLEY LITTLE	SAFE BABIES SAFE MOMS	KENNEWICK
TODD, RUTH	SHEFFIELD MANOR	PROSSER
CARLEEN GRAWL	SILVERFERN	KENNEWICK
MOUNTAIN, TAMMY M.	SUN TERRACE PROSSER	PROSSER
MIKE MILLER	SWIFT REHABILITATION	RICHLAND
	TAXI 1	KENNEWICK
	THE SALVATION ARMY	PASCO
DAVID SHOLIN	THE SALVATION ARMY	RICHLAND
MCBRIDE, BERNADETTE	TRANQUILITY MANOR	KENNEWICK
CINDY MILLER	TRI-CITIES CANCER CENTER	KENNEWICK

2014 HUMAN SERVICES TRANSPORTATION PLAN STAKEHOLDERS - BENTON, FRANKLIN COUNTIES

ADDRESSEE	ORGANIZATION	CITY
	TRI-CITIES KIDNEY CENTER	KENNEWICK
CINDY FRANSEN	TRI-CITIES RESIDENTIAL SERVICES	KENNEWICK
DEBORAH BATES	TRI-CITIES RETIREMENT INN	PASCO
MELLGREN, ALENA	TRI-CITIES RETIREMENT INN	PASCO
BECKY GAUTHIER	UNITED WAY OF BENTON AND FRANKLIN COUNTIES	KENNEWICK
MARILYN DAVIS	UNITED WAY OF BENTON AND FRANKLIN COUNTIES	KENNEWICK
LARRY WERST	VA CLINIC	RICHLAND
ILKA GILLIAM	WEST RICHLAND - SENIOR CENTER	WEST RICHLAND
LAURA WAITE	WILSON HOUSE	PASCO
MICHELLE MANN	WORKSOURCE COLUMBIA BASIN	KENNEWICK
BATES, DEBORAH	WYNWOOD OF COLUMBIA EDGEWATER	RICHLAND
STEVE HOWLAND	YMCA	RICHLAND

Appendix C HSTP Gaps & Strategies

Public outreach for the 2014 Coordinated Public Transit Human Services Transportation Plan (HSTP) was accomplished with two meetings: A Stakeholder Workshop in July and a public meeting in August. Limited English Proficiency, minority, and low income populations were reached in our commitment to Title VI compliance.

Included is a link to the BFCG HSTP full document.

<http://bfcog.us/wp-content/uploads/2015/05/2014-Coordinated-Public-Transit-Human-Services-Transportation-Plan.pdf>

Stakeholder Workshop

A Stakeholder Workshop was held in Kennewick on July 14th. The purpose of the meeting was to educate transportation stakeholders about the regional Human Services Transportation Plan process and the federal and state requirements; identify common origins and destinations; identify a list of service gaps or needs; and identify potential strategies or solutions to address those needs.

A mailing list of 120 businesses and agencies were sent letters inviting their participation. Attendance was disappointing, with three agencies represented at the meeting.

Stakeholder participation is a critical component of a successful Human Services Transportation Planning process. Stakeholders are those agencies that provide or are involved in transportation and advocacy groups representing customers. A few examples of stakeholders are: transit agencies, paratransit providers, taxi companies, social service agencies, managed care facilities and agencies that serve the needs of low-income, disabled and elderly people.

Engaging the appropriate organizations and individuals in the planning effort is critical to identifying the needs of the target population, the needs of the community/region, the transportation services available, and the identification of new solutions.

At the workshop, a PowerPoint presentation gave background on state and federal transit funding, the WSDOT Consolidated Grant process and an outline on the development of the HSTP. The meeting then discussed origins and destinations.

Despite the limited attendance, discussion of the map did take place and stakeholders identified additional human service agencies to be added to the map.

Identification of Gaps and Strategies

Following the discussion of origins and destinations, the workshop provided an interactive opportunity for stakeholders to offer their insight as to service gaps and barriers preventing full mobility for populations subject to this planning effort. Potential needs could involve a decrease in, or absence of, service delivery, service quality, eligibility criteria, or cost.

After identifying the unmet needs of the region, those present were asked to determine the strategies that are most appropriate and useful in addressing those gaps.

Public Meeting

A public meeting was held on August 28th in Kennewick. Letters were sent to individuals and agencies on the stakeholder meeting list inviting both the stakeholders and their clients, and emails were sent to the list of transportation providers developed for the Provider Survey. Two separate Notices announcing the meeting were placed in the Tri-City Herald and Tu Decides, a regional Spanish language newspaper. Additionally, notices of the meetings in both English and Spanish were placed in all Ben Franklin Transit fixed route and Dial-a-Ride vehicles.

Attendance at the meeting numbered about twenty. Those present included persons with disabilities, seniors, staff from transportation providers and social service agencies, public transportation advocates, the press and the general public.

The purpose of the meeting was to broaden the participation in the planning effort to include members of the public, offer them the opportunity to confirm preliminary findings with respect to service gaps and proposed strategies, and prioritize the needs. At the meeting, a PowerPoint presentation provided attendees with a project overview.

Multiple maps were available for review, including several portraying census data. Also on display were a map showing the location and number of employees of major employers with Ben Franklin Transit fixed routes and service area; a map showing representative origins and destinations in Benton and Franklin Counties; and a map showing the most frequent origins and destinations for Ben Franklin Transit Dial-A-Ride trips.

As with the stakeholder meeting, origins and destinations as well as gaps and strategies were reviewed and discussed. Additionally, the service gaps, or needs, were prioritized.

The Stakeholder workshop convened in June 2014 was not well attended. However, the outcome was three sets of information: a revised map of origins and destinations; an augmented list of service gaps and unmet transportation needs; and strategies or solutions to address those needs.

The public meeting was held on August 28th in Kennewick. The purpose of the meeting was to broaden the participation in the planning effort to include members of the public, offer them the opportunity to confirm preliminary findings with respect to service gaps and proposed strategies, and prioritize the needs. At the meeting, a PowerPoint presentation provided attendees with a project overview. As with the stakeholder meeting, origins and destinations as well as gaps and strategies were reviewed and discussed. Additionally, the service gaps, or needs, were prioritized.

The workshop and meeting provided an opportunity for stakeholders and the public to offer their insight as to origins and destinations in the two county area, service gaps and barriers preventing full mobility for populations targeted by this planning effort, and strategies that might address those gaps. Additionally, those attending the public meeting prioritized the identified unmet needs.

Subsequently, that preliminary identification of gaps and strategies was reviewed by the Coordinated Human Services Transportation Plan Advisory Committee. Further discussion by the Committee led to combining some gaps or strategies, and adding new ones.

Service Gaps & Strategies

A number of service gaps and potential strategies to address those gaps were identified through discussion among stakeholders. The list was reviewed and supplemented by the HSTP Advisory Committee. Finally, discussion and review at the public meeting resulted in additional needs being identified.

The final lists of service gaps and strategies are below.

Service Gaps

Stakeholders were asked to identify various transportation needs or gaps in existing transportation services. By identifying the unmet needs of the area, stakeholders can determine the services that are most appropriate and useful to help gain access to the community.

Gaps were identified at the stakeholder workshop in June 2014. The list was then supplemented by the HSTP Advisory Committee at their July meeting and the attendees at the August public meetings.

The final list of strategies for the 2014 HSTP for Benton and Franklin Counties is shown below.

Table B-1 2014 HSTP Service Gaps

- Service to north Franklin County
- Sustain existing services
- GPS for BFT Buses
- Technology for “real time” GPS
- Service to Rural areas outside PTBA (Benton County & Franklin County)
- Lighting /Trees for bus shelters, Passenger Amenities
- Video/Audio equipment for all buses & Transit centers
- Few alternatives to public transportation to assist seniors and individuals with disabilities with transportation
- Increased wheelchair access to Night Service and Sunday Service
- Increased out of boundary service
- Limited use/access/reliance on fixed-route service by individuals with disabilities

Agencies submitting HSTP grant requests will use this list of needs to qualify their 2014 Consolidated Grant Program project applications.

Strategies

Strategies are solutions to address the unmet needs. In light of a region's unmet needs, planners will consider an array of service alternatives to accommodate varying transportation needs of urban and rural areas.

Transportation solutions will vary in each area depending on the resources available, the size of the market for each alternative and the extent of existing services. Options include buying vehicles, increasing fixed route service (extending hours or territory), employer vanpool services, dial-a-ride services, volunteer ride services, bus passes, gas vouchers, travel training, mobility management, and others.

As stated above for gaps, Stakeholders initially identified the list of strategies. Subsequently, both the Human Services Transportation Plan Advisory Committee and those attending the public meeting supplemented the original list.

The final list of strategies for Benton and Franklin Counties is shown below.

2014 HSTP Strategies

- Exceed ADA minimum Requirements
- Improve access to fixed-route service and decrease reliance by individuals with disabilities on ADA-complementary paratransit service
- Provide alternatives to public transportation that assist seniors and individuals with disabilities with transportation
- Investigate service outside of PTBA
- Continuation of existing services
- Maintain Transit Training
- Increase number of bus shelters, provide amenities
- Continuation of 211 phone services
- Stakeholders meet annually to assess needs and coordinate services provided
- Maximize service by increasing efficiency
- Further subsidize fares

Analysis of Service Gaps

A number of unmet needs were identified. Although some perceived gaps relate to improving the fixed route transit services, the solutions needed to address those gaps could be provided through other means, such as vanpools, taxi voucher programs, etc.

A potential transportation strategy might be defined as follows:

- Continuation of current services that would not otherwise operate without grant funds
- Extension or expansion of current services to meet an area which is underserved or lacks service entirely
- New service established to meet an identified need

Transportation strategies were identified in all three definition areas, and generally fall into the following categories:

Need to maintain current levels of service

In times when there are requests for strategies to increase transportation services, retaining funding for current levels of service should not be overlooked in anticipation of increasing levels of service. The following are a list of needs identified that maintain current services:

- Continuation of existing services
- Maintain Transit Training
- Continuation of 211 phone services

Areas which are underserved

In both counties, persons who live or work outside the transit agency's core service area can't easily access public transit. A priority strategy was to expand out of bounds service to include North Franklin County.

- Maximize service by increasing efficiency
- Improve access to fixed-route service and decrease reliance by individuals with disabilities on ADA-complementary paratransit service
- Provide alternatives to public transportation that assist seniors and individuals with disabilities with transportation
- Exceed ADA minimum Requirements
- Increase number of bus shelters, provide amenities

Lack of availability or lack of service entirely

The need for public transit service to increase the hours of service was a concern voiced by stakeholders in both counties.

- Investigate service outside of PTBA
- ITS architecture to address on-time bus information
- Stakeholders meet annually to assess needs and coordinate services provided

Prioritized Service Gaps & Needs

An outcome of the public meeting was a prioritized list of Gaps & Needs for the entire region, which is shown below with the number of votes each need received. It should be noted that this list reflects the list of needs prioritized, and augmented, at the public meeting.

Benton-Franklin RTPO

2014 Coordinated Human Services Transportation Plan

Prioritized Service Gaps/Needs

- Additional bus shelters: Lighting for bus shelters/Trees for bus shelters, Passenger amenities – 8 votes
- Increased out of boundary service/ Badger Canyon – 7 votes
- Service to north Franklin County – 6 votes
- Less wait time for Dial-a-Ride return trips; Increase frequency of Dial-a-Ride service to 30 minutes - 6 votes
- Sustain existing services – 4 votes
- Video/Audio equipment for all buses & Transit centers – 4 votes
- Few alternatives to public transportation to assist seniors and individuals with disabilities with transportation – 3 votes
- Increased wheelchair access to Night Service and Sunday Service - 3 votes
- GPS for BFT Buses – 2 votes
- Technology for “real time” GPS – 1 vote
- Service to Rural areas outside PTBA (Benton County & Franklin County) – 1 vote
- Limited use/access/reliance on fixed-route service by individuals with disabilities – 1 vote