

# SUMMARY OF CHANGES

## LEGAL

FY2017	FY2018	FY2019	FY2020
8. LEGAL	1. LEGAL	1. LEGAL	1. LEGAL
No significant changes.	Removed questions relating to designation status and ensuring documentation of designation on file with the FTA.	No significant changes.	Added a new question: Does the recipient include clauses in its third party and subrecipient agreements that require notification of any legal matter that may affect the Federal government?
	Instead of asking questions relating to state/local law pending litigation affecting funding status, revised to inquire about legal matters including major disputes, breaches, defaults, or litigation affecting the Federal government.		
	Revised question relating to notification of FTA regional counsel, to also include <del>or</del> FTA's Chief Counsel.		
	Revised lobbying activities and disclosures question into two questions.		
	Revised question regarding subrecipients, contractors, and subcontractors lobbying activities and disclosures into two questions.		

**FINANCIAL MANAGEMENT AND CAPACITY**

FY2017	FY2018	FY2019	FY2020
1. FINANCIAL MANAGEMENT AND CAPACITY	2. FINANCIAL MANAGEMENT AND CAPACITY	2. FINANCIAL MANAGEMENT AND CAPACITY	2. FINANCIAL MANAGEMENT AND CAPACITY
<p>Expanded table delineating Single Audit threshold to include the threshold applicable to the regulation in effect for the audit conducted (question 6).</p>	<p>Moved Enhanced Review trigger, background and resource questions to issues/areas of concern for FTA.</p>	<p>For question F1 regarding financial policies and procedures, eliminated indicators of compliance regarding changes to policies and procedures in response to audit/review findings, significant changes to its organization, software being used, and changes to Federal regulatory requirements.</p>	<p>For question F9 addressing subrecipient oversight, added indicators of compliance regarding oversight of eligible match funds and operating assistance calculations.</p>
<p>Added table delineating the types of entities required to submit cost allocation plans (CAP) or indirect cost rate proposals (ICRP) and the regulatory reference and related cognizant agency to which the CAP or ICRP is to be submitted (question 16).</p>	<p>For question F1 regarding financial policies and procedures:</p> <ul style="list-style-type: none"> <li>• clarified that recipients are only required to have written procedures for allowability of costs and cash management</li> <li>• added indicator regarding changes to the recipients policies and procedures based on organizational changes, audits, and/or software</li> <li>• added indicator regarding changes to the recipients policies and procedures based on federal regulations</li> </ul>	<p>Eliminated question F8 regarding the eligibility of local match funds by addressing documentation of volunteered services or in-kind contributions in question F4 and eligibility of local match in question F7.</p>	

**FINANCIAL MANAGEMENT AND CAPACITY**

FY2017	FY2018	FY2019	FY2020
1. FINANCIAL MANAGEMENT AND CAPACITY	2. FINANCIAL MANAGEMENT AND CAPACITY	2. FINANCIAL MANAGEMENT AND CAPACITY	2. FINANCIAL MANAGEMENT AND CAPACITY
<p>Removed trigger, “there is no multi-year financial plan or it is insufficient” and related deficiency code.</p>	<p>For question F2 regarding financial organizational structure:</p> <ul style="list-style-type: none"> <li>• added indicator regarding the authority of all financial duties</li> <li>• added indicator regarding financial functions and responsibilities segregated</li> <li>• added indicator regarding internal checks and balances</li> </ul>		
	<p>For question F3 regarding the financial management system:</p> <ul style="list-style-type: none"> <li>• eliminated an indicator related to reconciliation of FTA and recipient award balances</li> <li>• eliminated indicator relating to how financial procedures track expenditures by activity line item (ALI)</li> <li>• added indicator regarding tracking and generating financial reports</li> <li>• added an indicator relating to financial report elements and source documentation</li> <li>• added an indicator regarding the accuracy of financial reports</li> </ul>		

**FINANCIAL MANAGEMENT AND CAPACITY**

FY2017	FY2018	FY2019	FY2020
1. FINANCIAL MANAGEMENT AND CAPACITY	2. FINANCIAL MANAGEMENT AND CAPACITY	2. FINANCIAL MANAGEMENT AND CAPACITY	2. FINANCIAL MANAGEMENT AND CAPACITY
	<p>For question F4 regarding the draw down and tracking of federal expenses:</p> <ul style="list-style-type: none"> <li>• eliminated indicator relating to the process for receiving and disbursing FTA funds</li> <li>• eliminated indicator relating to ECHO drawdown restrictions</li> <li>• added indicator regarding ECHO draw supporting documents</li> <li>• added indicator relating to FTA notification of drawdown in excess of \$50M and/or \$500M</li> </ul>		
	<p>For question F5 regarding charging indirect costs to FTA awards, added indicator regarding the use of the de minimis rate.</p>		
	<p>For question F6 regarding Single Audits:</p> <ul style="list-style-type: none"> <li>• added indicator regarding to what years were singles audits were required to be submitted</li> <li>• added indicator regarding whether the audits were submitted on-time</li> </ul>		

**FINANCIAL MANAGEMENT AND CAPACITY**

FY2017	FY2018	FY2019	FY2020
1. FINANCIAL MANAGEMENT AND CAPACITY	2. FINANCIAL MANAGEMENT AND CAPACITY	2. FINANCIAL MANAGEMENT AND CAPACITY	2. FINANCIAL MANAGEMENT AND CAPACITY
	For question F7 regarding financial resources, eliminated an indicator related to new/ expansion of transit services		
	Consolidated all indicators regarding oversight of subrecipients into question F10.		
	Eliminated questions relating to Emergency Relief awards.		

**TECHNICAL CAPACITY – AWARD MANAGEMENT**

FY2017	FY2018	FY2019	FY2020
2. TECHNICAL CAPACITY	3. TECHNICAL CAPACITY – AWARD MANAGEMENT	3. TECHNICAL CAPACITY – AWARD MANAGEMENT	3. TECHNICAL CAPACITY – AWARD MANAGEMENT
Combined Program Management, Grant Administration, and Project Management from the State Management Review into one review area, Technical Capacity.	Incorporated questions regarding award management into this section.	No significant changes.	No significant changes.
Incorporated new guidance on reporting intervals for Emergency Relief awards.	Moved Enhanced Review trigger, background and resource questions to issues/areas of concern for FTA.		
	Eliminated questions relating to Emergency Relief awards.		
	Moved the questions regarding Associated Transit Improvement Reports to 18. Section 5307 Program Requirements.		
	Incorporated risk-based reporting frequencies into question TC-AM1 regarding timely submittal of Milestone Progress Reports (MPRs) and Federal Financial Reports (FFRs).		

**TECHNICAL CAPACITY – PROGRAM MANAGEMENT AND SUBRECIPIENT OVERSIGHT**

FY2017	FY2018	FY2019	FY2020
<b>2. TECHNICAL CAPACITY</b>	<b>4. TECHNICAL CAPACITY – PROGRAM MANAGEMENT AND SUBRECIPIENT OVERSIGHT</b>	<b>4. TECHNICAL CAPACITY – PROGRAM MANAGEMENT AND SUBRECIPIENT OVERSIGHT</b>	<b>4. TECHNICAL CAPACITY – PROGRAM MANAGEMENT AND SUBRECIPIENT OVERSIGHT</b>
Combined Program Management, Grant Administration, and Project Management from the State Management Review into one review area, Technical Capacity.	Incorporated questions regarding program management and subrecipient oversight into this section.	Clarified requirements for development and submission of a state or program management plan in question TC-PgM2.	No significant changes.
Updated guidance relating to Section 5339 state and program management plans to reflect FAST Act changes.	Moved Enhanced Review trigger, background and resource questions to issues/areas of concern for FTA.		
Added question 25 and associated guidance regarding subrecipient agreement content as required by 2 CFR Part 200.	Moved questions regarding oversight of financial capacity to Section 2. “Financial Management and Capacity.”		
	Eliminated question regarding oversight of subrecipient technical capacity.		
	Eliminated question regarding technical assistance to subrecipients.		
	Eliminated question regarding state safety oversight.		

**TECHNICAL CAPACITY – PROGRAM MANAGEMENT AND SUBRECIPIENT OVERSIGHT**

FY2017	FY2018	FY2019	FY2020
<b>2. TECHNICAL CAPACITY</b>	<b>4. TECHNICAL CAPACITY – PROGRAM MANAGEMENT AND SUBRECIPIENT OVERSIGHT</b>	<b>4. TECHNICAL CAPACITY – PROGRAM MANAGEMENT AND SUBRECIPIENT OVERSIGHT</b>	<b>4. TECHNICAL CAPACITY – PROGRAM MANAGEMENT AND SUBRECIPIENT OVERSIGHT</b>
	Added question TC-PgM1 regarding transit provider involvement in the development of the long-range transportation plan and the State Transportation Improvement Plan (STIP) (moved from Planning/Program of Projects).		
	Expanded question TC-PgM1 to address nonmetropolitan local official involvement in the development of the long-range transportation plan and the STIP.		
	In question TC-PgM2 regarding state and program management plans, directed reviewers to review the plans for required elements only when the plans have not been reviewed and approved by FTA.		
	Added question TC-PgM3 regarding signed lobbying certifications from subrecipients (moved from Procurement).		
	Added question TC-PgM4 regarding suspension and debarment as it relates to subrecipients (moved from Procurement).		

**TECHNICAL CAPACITY – PROGRAM MANAGEMENT AND SUBRECIPIENT OVERSIGHT**

FY2017	FY2018	FY2019	FY2020
<b>2. TECHNICAL CAPACITY</b>	<b>4. TECHNICAL CAPACITY – PROGRAM MANAGEMENT AND SUBRECIPIENT OVERSIGHT</b>	<b>4. TECHNICAL CAPACITY – PROGRAM MANAGEMENT AND SUBRECIPIENT OVERSIGHT</b>	<b>4. TECHNICAL CAPACITY – PROGRAM MANAGEMENT AND SUBRECIPIENT OVERSIGHT</b>
	Clarified requirements regarding verifying subrecipient suspension and debarment in In question TC-PgM4.		

**TECHNICAL CAPACITY – PROJECT MANAGEMENT**

FY2017	FY2018	FY2019	FY2020
<b>2. TECHNICAL CAPACITY</b>	<b>5. TECHNICAL CAPACITY – PROJECT MANAGEMENT</b>	<b>5. TECHNICAL CAPACITY – PROJECT MANAGEMENT</b>	<b>5. TECHNICAL CAPACITY – PROJECT MANAGEMENT</b>
Combined Program Management, Grant Administration, and Project Management from the State Management Review into one review area, Technical Capacity.	Incorporated questions regarding project management into this section.	No significant changes.	Clarified requirements relating to force account justifications versus force account plans in question TC-PjM2.
	Moved Enhanced Review trigger, background and resource questions to issues/areas of concern for FTA.		
	Clarified force account plan requirements in question TC-PjM2.		
	Added language which addressed oversight of subrecipient capital or planning projects in question TC-PjM3.		

**TRANSIT ASSET MANAGEMENT**

<b>FY2017</b>	<b>FY2018</b>	<b>FY2019</b>	<b>FY2020</b>
<b>TRANSIT ASSET MANAGEMENT</b>	<b>TRANSIT ASSET MANAGEMENT</b>	<b>6. TRANSIT ASSET MANAGEMENT</b>	<b>6. TRANSIT ASSET MANAGEMENT</b>
Section did not exist in 2017.	Section did not exist in 2018.	Added the section.	No significant changes.

**SATISFACTORY AND CONTINUING CONTROL**

FY2017	FY2018	FY2019	FY2020
<b>9. SATISFACTORY AND CONTINUING CONTROL</b>	<b>6. SATISFACTORY AND CONTINUING CONTROL</b>	<b>7. SATISFACTORY AND CONTINUING CONTROL</b>	<b>7. SATISFACTORY AND CONTINUING CONTROL</b>
Added question 14 to address state useful life standards for Section 5339 funds used in Section 5307-funded service.	Eliminated questions relating to Emergency Relief awards and state useful life standards.	Eliminated question regarding certifications of cost-effectiveness determinations for use of capital assistance to finance leases of transit facilities or equipment.	No significant changes.
	Moved all questions relating to Sections 5310 and 5311 requirements to the respective stand-alone review areas.	Removed the deficiency for excess spare ratios for fixed-route fleets of fewer than 50 vehicles.	
	Added question SCC1 regarding an inventory for real property purchased with an award made on or after December 26, 2014.	Refocused Question SCC12 regarding oversight to address subrecipients only as the recipient's procedures for maintaining satisfactory continuing control over its FTA-funded property should also address property used by contractors and lessees. Added indicators regarding excess real property, incidental use, idle facilities, disposition, and flood insurance.	
	Added question SCC3 regarding use, lease or disposition of idle FTA-funded real property.		
	In questions SCC7 and SCC8, clarified equipment management and disposition requirements as they apply to states.		

**SATISFACTORY AND CONTINUING CONTROL**

FY2017	FY2018	FY2019	FY2020
<b>9. SATISFACTORY AND CONTINUING CONTROL</b>	<b>6. SATISFACTORY AND CONTINUING CONTROL</b>	<b>7. SATISFACTORY AND CONTINUING CONTROL</b>	<b>7. SATISFACTORY AND CONTINUING CONTROL</b>
	Added question SCC11 regarding certifications of cost-effectiveness determinations for use of capital assistance to finance leases of transit facilities or equipment.		

**MAINTENANCE**

FY2017	FY2018	FY2019	FY2020
3. MAINTENANCE	7. MAINTENANCE	8. MAINTENANCE	8. MAINTENANCE
No significant changes.	Moved Enhanced Review trigger, background and resource questions to issues/areas of concern for FTA.	No significant changes.	No significant changes.
	Clarified requirements that apply to states.		
	Removed deficiencies regarding incomplete/inadequate/out of date vehicle and facility maintenance plans.		
	Consolidated all indicators regarding oversight of subrecipient, contractors, lessees, into question M5.		

**MAINTENANCE**

FY2017	FY2018	FY2019	FY2020
3. MAINTENANCE	7. MAINTENANCE	8. MAINTENANCE	8. MAINTENANCE
	<p>For question M2 regarding preventive maintenance inspections for FTA-funded assets:</p> <ul style="list-style-type: none"> <li>• Removed questions, relating to goals and objectives inclusion in written maintenance plan</li> <li>• Removed questions, relating to on-board security systems requirement for maintenance program</li> <li>• Removed question, relating to mission critical items</li> <li>• Removed question, relating to record retention</li> <li>• Removed question, relating to location of preventive maintenance records</li> </ul>		
	<p>For question M3 regarding vehicle maintenance accessibility features, added indicator relating to maintaining accessibility features for facilities and facility related equipment.</p>		
	<p>Consolidated all indicators regarding oversight of subrecipients, contractors, lessees into question M5.</p>		

**PROCUREMENT**

FY2017	FY2018	FY2019	FY2020
6. PROCUREMENT	8. PROCUREMENT	9. PROCUREMENT	9. PROCUREMENT
<p>Added information on Super Circular requirements being the point of reference over FTA C. 4220.1F where there is conflicting information between the two.</p>	<p>Continued to incorporate FAST and 2 CFR Part 200 changes into applicable questions for areas such as thresholds and Buy America.</p>	<p>Overall, noted that flexibility afforded by 2 CFR Part 200 for states should not be misconstrued as absolving a state from Federal requirements. This note was included in the Purpose of the Review Area section and is additionally incorporated in the Applicability and Potential Deficiency Determination sections of each question.</p>	<p>Clarified that FTA Circular 4220.1F has not been updated to incorporate 2 CFR Part 200.</p>
<p>Added information on thresholds relating to Buy America (\$150,000) and micro-purchases (\$3,500).</p>	<p>Moved Enhanced Review trigger, background and resource questions to issues/areas of concern for FTA.</p>	<p>Updated small and micro-purchase thresholds to currently-approved levels.</p>	<p>Removed revenue contracts from type of procurements to sample during the Comprehensive Review.</p>
<p>Revised explanation for notification to FTA of protests.</p>	<p>Removed questions relating to staffing of procurement function.</p>	<p>Added question regarding the public availability of protest procedures.</p>	<p>For question P2, clarified what standards of conduct should address regarding internal conflicts of interest.</p>
<p>Provided additional information on geographic preference related to construction hiring and USDOT's pilot program for other-than-construction hiring.</p>	<p>Revised review of procurement policies and procedures to align with the areas noted in 2 CFR Part 200.</p>	<p>Added information in question on A&amp;E services for on-call A&amp;E contracts.</p>	<p>For question P11, added clause for Notice to FTA and USDOT Inspector General of information related to fraud, waste abuse or other legal matters, as well as the corresponding language from FTA Master Agreement.</p>

**PROCUREMENT**

FY2017	FY2018	FY2019	FY2020
6. PROCUREMENT	8. PROCUREMENT	9. PROCUREMENT	9. PROCUREMENT
Revised information relating to need to search System for Award Management prior to award.	Removed separate question relating to organizational conflicts of interest and duplicative or unnecessary procurements; these are now covered in question P1 regarding procurement policies and procedures.	Modified the clauses reviewed in the Comprehensive Review to only those clauses noted specifically in 2 CFR Part 200 and the Master Agreement. If one or more of those applicable clauses is missing, a deficiency is made.	For question P14 regarding change orders, added governing directives from 2 CFR 200 concerning full and open competition.
Updated Buy America information noting that requirements apply to capital leases.	Modified question P3 on protest procedures to conform with 2 CFR Part 200 (relating to FTA's involvement).	Revised selection of subrecipient procurement (in oversight question) to focus on procurements that had previously been reviewed by the recipient.	For question P17 regarding assignment of options, revised the basic requirement to include FTA recommendations regarding assignability clauses in piggyback contracts.
Updated information on piggyback, state-led, or joint procurements based on FAST Act.	Removed question on USDOT's pilot program on Contracting Initiatives.		For question P20, revised information on Buy America pre-award and post-delivery certifications to indicate that they have to be completed but not signed.
Updated information on Altoona testing pass/fail requirements per FAST Act.	Changed deficiency determination from only deficient if all clauses were missing to deficiency if one required clause was missing.		
Included transit vehicle manufacturer (TVM) definition and additional related information.	Removed information questions regarding types of procurements conducted or anticipated.		
	Removed questions on Brooks Act compliance in on-call type procurements.		

**PROCUREMENT**

FY2017	FY2018	FY2019	FY2020
6. PROCUREMENT	8. PROCUREMENT	9. PROCUREMENT	9. PROCUREMENT
	Added FAST Act Buy America domestic content question into piggybacking question.		
	Removed question regarding Buy America waiver requests.		
	Added potential deficiency for the recent requirement for vehicles to receive 'passing' bus-testing report.		
	Included increasing domestic content Buy America requirements to pre-award/post-delivery questions.		
	Removed emergency relief procurement questions.		
	Removed procurement oversight question for procurements by contractors.		

**DISADVANTAGED BUSINESS ENTERPRISE**

FY2017	FY2018	FY2019	FY2020
7. DISADVANTAGED BUSINESS ENTERPRISE	9. DISADVANTAGED BUSINESS ENTERPRISE	10. DISADVANTAGED BUSINESS ENTERPRISE	10. DISADVANTAGED BUSINESS ENTERPRISE
<p>Provided information on obtaining December 1, 2015, semi-annual reports.</p>	<p>Moved Enhanced Review trigger, background and resource questions to issues/areas of concern for FTA.</p>	<p>No significant changes.</p>	<p>Expanded question DBE2 regarding DBELO designation to address adequate resources to implement the program.</p>
<p>Added information on working with procurement for DBE clause inclusion.</p>	<p>Removed question relating to 'timely' submission of DBE program plan.</p>		<p>For question DBE3 regarding DBE goal submissions, added indicator on revising overall goals based on FTA review and comment to submission.</p>
<p>Expanded question and added verbiage to explanation and determination regarding the duration for posting notice of goal to website.</p>	<p>Removed question relating to loading DBE program plan to EAMS.</p>		<p>For question DBE10, expanded question on TVM project-specific goals to other project-specific goals.</p>
<p>Added discussion in explanation that notification of vehicle awards should be done using the Transit Vehicle Manufacturer (TVM) Award Reporting Form located online through the FTA's Civil Rights DBE Webpage and provided information on award of options and subrecipient awards.</p>	<p>Changed question which asked if DBE program was approved by FTA to ask if required revisions noted by FTA were made.</p>		<p>For question DBE12, expanded indicator on monitoring to address commercially useful function of DBEs.</p>

**DISADVANTAGED BUSINESS ENTERPRISE**

FY2017	FY2018	FY2019	FY2020
7. DISADVANTAGED BUSINESS ENTERPRISE	9. DISADVANTAGED BUSINESS ENTERPRISE	10. DISADVANTAGED BUSINESS ENTERPRISE	10. DISADVANTAGED BUSINESS ENTERPRISE
Added definition of TVM.	Removed questions relating to the sufficiency of the overall goal methodology or the goal-setting process.		For question DBE13 regarding certifications and standards: <ul style="list-style-type: none"> <li>• added indicator on required training for certification staff</li> <li>• added indicator on making in-state and interstate certifications timely</li> </ul>
Added information on enforcement of race-conscious goals and monitoring for reporting purposes for race-neutral goals.	Removed question relating to overall goal of 'zero.'		
	Revised DBE Liaison Officer (DBELO) question to focus on vacancy of position and direct and independent access of DBELO to the chief executive officer (CEO).		
	Eliminated questions on other staff/resources applied to the DBE program and the sufficiency of resources.		
	Removed questions relating to follow-up to FTA's review of shortfall analysis and conciliation agreements.		
	Removed question relating to a recipient trying race-conscious if it was not meeting its goal entirely race-neutrally as projected.		

**DISADVANTAGED BUSINESS ENTERPRISE**

FY2017	FY2018	FY2019	FY2020
7. DISADVANTAGED BUSINESS ENTERPRISE	9. DISADVANTAGED BUSINESS ENTERPRISE	10. DISADVANTAGED BUSINESS ENTERPRISE	10. DISADVANTAGED BUSINESS ENTERPRISE
	Removed question relating to actions taken by a recipient upon notification from DBE that it was not being paid promptly.		
	Added question on DBE termination/substitution process for a race-conscious project.		
	Eliminated question on being part of Unified Certification Program (UCP).		
	Eliminated question on submission by UCP of annual report to USDOT.		
	Removed DBE supplemental section to be asked of all agencies that certify.		
	Added/retained questions on certification regarding 1) use of correct application form 2) use of correct personal net worth (PNW) form 3) conduct of site visit for instate initial certifications, and 4) recording of correct NAICS codes in UCP directory.		

**TITLE VI**

FY2017	FY2018	FY2019	FY2020
5. TITLE VI	10. TITLE VI	11. TITLE VI	11. TITLE VI
Removed reference to FTA C. 4702.1A, as all recipient programs should be in compliance with FTA Circular.4702.1B.	Moved Enhanced Review trigger, background and resource questions to issues/areas of concern for FTA.	No significant changes.	Added a new indicator to question TVI3: regarding the required elements of the Title VI notice.
Removed triggers regarding the (1) assessment of recipients' limited English proficiency analysis, (2) constructing new facilities and the applicability of the National Environmental Policy Act (NEPA) process, and (3) changes to fare, fare medium, or service characteristics.	Consolidated all indicators regarding oversight of subrecipients, contractors, lessees, to TVI6.		Added a new indicator to question TVI8 regarding the recipient's monitoring the amenities it provides in accordance with its Title VI Program.
Included the definition of facilities as it applies to facility siting requirements (question 22).	For question TV1 regarding Title VI Program: added indicator regarding FTA's issued correspondence indicating required revisions to the submitted Title VI Programs.		
Added questions on program-specific requirements for metropolitan planning organizations (MPOs) that are direct recipients of FTA funds (questions 39-42).	Removed question, What steps has the grantee taken to ensure meaningful access to the benefits, services, information, and other important portions of its programs and activities for limited English proficiency (LEP) persons?		
	Removed question, How did the results of the four-factor analysis influence the steps taken?		

**TITLE VI**

FY2017	FY2018	FY2019	FY2020
5. TITLE VI	10. TITLE VI	11. TITLE VI	11. TITLE VI
	Removed question, How does the grantee train employees to provide timely and reasonable language assistance, even those that may not be apparent from the four-factor analysis?		
	Removed question, What processes does the grantee use to evaluate if it is distributing funds in a nondiscriminatory manner?		
	Removed question, How does the State DOT analyze the overall allocation of the benefits and burdens of transportation investments in light of Title VI considerations?		
	Removed question, What processes does the grantee use to evaluate if it is distributing funds in a nondiscriminatory manner?		
	Removed question, How does the State DOT analyze the overall allocation of the benefits and burdens of transportation investments in light of Title VI considerations?		

**TITLE VI**

FY2017	FY2018	FY2019	FY2020
5. TITLE VI	10. TITLE VI	11. TITLE VI	11. TITLE VI
	<p>Removed question, How did the grantee collect and analyze demographic data showing the extent to which members of minority groups were beneficiaries of programs receiving FTA financial assistance?</p>		
	<p>Remove question, When did the grantee update the required maps prior to proposed service reductions or eliminations?</p>		

**AMERICANS WITH DISABILITIES ACT – GENERAL**

FY2017	FY2018	FY2019	FY2020
<b>4. AMERICANS WITH DISABILITIES ACT</b>	<b>11. AMERICANS WITH DISABILITIES ACT - GENERAL</b>	<b>12. AMERICANS WITH DISABILITIES ACT - GENERAL</b>	<b>12. AMERICANS WITH DISABILITIES ACT - GENERAL</b>
Incorporated references to FTA Circular 4701.1, “Americans with Disabilities Act (ADA) Guidance.”	Moved Enhanced Review trigger, background and resource questions to issues/areas of concern for FTA.	For question ADA-GEN1 regarding ADA complaints: <ul style="list-style-type: none"> <li>added indicators regarding the processes for identifying and addressing ADA complaints</li> <li>eliminated discussion regarding contact information for filing a complaint</li> </ul>	For question ADA-GEN1, clarified requirements regarding summaries of complaints.
	For question ADA-GEN1 regarding complaints: <ul style="list-style-type: none"> <li>added indicator regarding contact information for filing a complaint</li> <li>clarified when a recipient may use the same process for accepting and investigating ADA and Title VI complaints</li> </ul>	For question ADA-GEN4 regarding the purchase of non-accessible vehicles for demand-response service, clarified certification requirements.	For question ADA-GEN3, added corrective action regarding advance notice for accessible vehicles.
	For question ADA-GEN2 regarding accessible new vehicles used in fixed-route service, eliminated the indicator related to accessible spare vehicles.	Added question ADA-GEN5 regarding equivalent service for services provided under contract by a taxi company, transportation network company (TNC), or other private entity.	For question ADA-GEN8, regarding service provisions, eliminated the indicator addressing forward-facing priority seating and associated deficiency.

**AMERICANS WITH DISABILITIES ACT – GENERAL**

FY2017	FY2018	FY2019	FY2020
<b>4. AMERICANS WITH DISABILITIES ACT</b>	<b>11. AMERICANS WITH DISABILITIES ACT - GENERAL</b>	<b>12. AMERICANS WITH DISABILITIES ACT - GENERAL</b>	<b>12. AMERICANS WITH DISABILITIES ACT - GENERAL</b>
	For question ADA-GEN8, moved indicators regarding maintenance of accessibility features to Section 7. "Maintenance."	For question ADA-GEN8 regarding service provision: <ul style="list-style-type: none"> <li>• added an indicator regarding service animals</li> <li>• added an indicator regarding designation of forward-facing seats as priority seating</li> <li>• added an indicator regarding designation of and policy towards securement locations</li> </ul>	For question ADA-GEN8, added indicators that address waivers from wheelchair users and standees who use wheelchair lifts as a condition of service, and associated deficiencies.
	For question ADA-GEN9 relating to general public route deviation service, added an indicator regarding equivalent service.		For question ADA-GEN9, added an indicator and associated deficiency code regarding maintenance of accessible paths.
	For question ADA-GEN10 regarding rail service, eliminated the indicator addressing dwell time as it is addressed in the question related to service provision.		
	For question ADA-GEN11 regarding ferry service: <ul style="list-style-type: none"> <li>• added an indicator adding requirements for a passenger with a disability to travel with another person</li> <li>• eliminated an indicator related to fares and surcharges</li> </ul>		

**AMERICANS WITH DISABILITIES ACT – GENERAL**

FY2017	FY2018	FY2019	FY2020
<b>4. AMERICANS WITH DISABILITIES ACT</b>	<b>11. AMERICANS WITH DISABILITIES ACT - GENERAL</b>	<b>12. AMERICANS WITH DISABILITIES ACT - GENERAL</b>	<b>12. AMERICANS WITH DISABILITIES ACT - GENERAL</b>
	Consolidated all indicators regarding oversight of contractors, lessees, and public entities into question ADA-GEN12.		
	Consolidated all indicators regarding oversight of subrecipients into question ADA-GEN13.		

**AMERICANS WITH DISABILITIES ACT – COMPLEMENTARY PARATRANSIT**

FY2017	FY2018	FY2019	FY2020
SECTION DID NOT EXIST IN 2017.	12. AMERICANS WITH DISABILITIES ACT – COMPLEMENTARY PARATRANSIT	13. AMERICANS WITH DISABILITIES ACT – COMPLEMENTARY PARATRANSIT	13. AMERICANS WITH DISABILITIES ACT – COMPLEMENTARY PARATRANSIT
	Moved Enhanced Review trigger, background and resource questions to issues/areas of concern for FTA.	Added question ADA-CPT1 regarding whether the recipient is a public operator of fixed-route service.	Added an indicator to question ADA-CPT3 regarding the time it takes to process visitor requests.
	Eliminated questions regarding service requirements.	For question ADA-CPT2 regarding eligibility determinations, added indicators that address: <ul style="list-style-type: none"> <li>• Inappropriate eligibility determination factors</li> <li>• Personal care attendants</li> </ul>	Clarified in question ADA-CPT5 that the Comprehensive Review will find a deficiency for noncompliant no-show policies even when they are not enforced.
	Eliminated indicators regarding service beyond ADA complementary paratransit requirements.	<ul style="list-style-type: none"> <li>• Added question ADA-CPT4 regarding service requirements.</li> </ul>	
	For question ADA-CPT4 regarding service availability, added an indicator regarding negotiating trip times during the reservation process.		

**EQUAL EMPLOYMENT OPPORTUNITY**

FY2017	FY2018	FY2019	FY2020
<b>17. EQUAL EMPLOYMENT OPPORTUNITY</b>	<b>13. EQUAL EMPLOYMENT OPPORTUNITY</b>	<b>14. EQUAL EMPLOYMENT OPPORTUNITY</b>	<b>14. EQUAL EMPLOYMENT OPPORTUNITY</b>
No significant changes.	Moved background questions to Issues/Areas of Concern for FTA Awareness.	No significant changes.	No significant changes.
	Revamped the section to incorporate the requirements of FTA Circular 4704.1A regarding frequency of equal employment opportunity (EEO) program submittals and abbreviated plan requirements. FTA now relies on Comprehensive Reviews to review abbreviated EEO programs.		

**SCHOOL BUS**

<b>FY2017</b>	<b>FY2018</b>	<b>FY2019</b>	<b>FY2020</b>
<b>14. SCHOOL BUS</b>	<b>14. SCHOOL BUS</b>	<b>15. SCHOOL BUS</b>	<b>15. SCHOOL BUS</b>
No significant changes.	Expanded oversight questions (SB3 and SB4) to address contractors and lessees.	No significant changes.	No significant changes.

**CHARTER BUS**

FY2017	FY2018	FY2019	FY2020
13. CHARTER BUS	15. CHARTER BUS	16. CHARTER BUS	16. CHARTER BUS
Clarified that FTA only communicates directly with the entities named in the complaint; therefore, in the case of subrecipients, there is no official role for recipients.	Eliminated the question regarding the subrecipient, contractor, or lessee requesting an advisory opinion from the Office of Chief Counsel.	No significant changes.	No significant changes.
Deleted question related to subrecipient's role in complaint process.	Eliminated the question regarding cease and desist orders.		
	Eliminated the question regarding registered charter provider, or its duly authorized representative, filing a complaint with the Office of the Chief Counsel.		
	Expanded oversight question (CB3) to address contractors and lessees.		
	Added question relating to quarterly reporting for Charter service provided		

**DRUG FREE WORKPLACE ACT**

<b>FY2017</b>	<b>FY2018</b>	<b>FY2019</b>	<b>FY2020</b>
<b>16. DRUG FREE WORKPLACE AND DRUG AND ALCOHOL PROGRAM</b>	<b>16. DRUG FREE WORKPLACE ACT</b>	<b>17. DRUG FREE WORKPLACE ACT</b>	<b>17. DRUG FREE WORKPLACE ACT</b>
No significant changes.	No significant changes.	No significant changes.	No significant changes.

**DRUG AND ALCOHOL PROGRAM**

FY2017	FY2018	FY2019	FY2020
<b>16. DRUG-FREE WORKPLACE AND DRUG AND ALCOHOL PROGRAM</b>	<b>17. DRUG AND ALCOHOL PROGRAM</b>	<b>18. DRUG AND ALCOHOL PROGRAM</b>	<b>18. DRUG AND ALCOHOL PROGRAM</b>
Added guidance regarding employees subject to both FTA and Federal Motor Carrier Safety Administration (FMCSA) drug and alcohol testing (question 7).	Moved background questions to Issues/Areas for FTA Concern.	No significant changes.	No significant changes.
Eliminated statement that if only one taxi company is available, it is not subject to FTA drug and alcohol testing requirements (question 7)	Eliminated questions regarding the drug and alcohol testing pool, annual Management Information System (MIS) reporting, random testing, and post-accident testing.		
Added question regarding drug and alcohol policies of ferry operators (question 8).	In question DA1, reduced the number of elements of a drug and alcohol policy reviewed. Added an indicator regarding policy distribution.		
Clarified MIS reporting requirements (questions 10 and 11).	In question DA5, focused the oversight question on qualifications of service agents and MIS reporting.		

**SECTION 5307 PROGRAM REQUIREMENTS**

FY2017	FY2018	FY2019	FY2020
<b>3. TECHNICAL CAPACITY</b>	<b>18. SECTION 5307 PROGRAM REQUIREMENTS</b>	<b>19. SECTION 5307 PROGRAM REQUIREMENTS</b>	<b>19. SECTION 5307 PROGRAM REQUIREMENTS</b>
Updated associated transit improvement discussion to incorporate FAST Act changes.	Incorporated Section 5307 requirements into one section.	No significant changes.	Deleted the question regarding associated transit improvement reports.
<b>10. Planning/Program of Projects</b>	Moved background and resource questions to issues/areas of concern for FTA.		Deleted question regarding transit security expenditures.
Added question 7 regarding public transit provider involvement in the state planning programs.	Added question 5307:1 regarding the contents of the written agreement with the MPO.		
<b>11. Public Comment on Fare and Service Changes</b>	Added review of the MPO public involvement plan to 5307:2 regarding public involvement.		
No significant changes.	Added an indicator to question 5307:4 regarding the location where an agency-issued half-fare identification card can be obtained.		
<b>12. Half Fare</b>			
No significant changes.			
<b>15. Security</b>			
No significant changes.			

**SECTION 5310 PROGRAM REQUIREMENTS**

FY2017	FY2018	FY2019	FY2020
<b>3. TECHNICAL CAPACITY</b>	<b>19. SECTION 5310 PROGRAM REQUIREMENTS</b>	<b>20. SECTION 5310 PROGRAM REQUIREMENTS</b>	<b>20. SECTION 5310 PROGRAM REQUIREMENTS</b>
Added questions regarding state tracking of Section 5310 funds by area (rural, small urban, and large urban) and transfers of Section 5310 funds.	Moved background and resource questions to issues/areas of concern for FTA.	No significant changes.	No significant changes.
	Eliminated indicator regarding the fair and equitable distribution of funds.		
	Eliminated indicator regarding cycle and duration of coordinated plans and coordination with MPOs in development of the plans.		
	In question 5310:5, added an indicator regarding leases of Section 5310-funded vehicles to private entities.		

**SECTION 5311 PROGRAM REQUIREMENTS**

FY2017	FY2018	FY2019	FY2020
<b>3. TECHNICAL CAPACITY</b>	<b>19. SECTION 5311 PROGRAM REQUIREMENTS</b>	<b>20. SECTION 5311 PROGRAM REQUIREMENTS</b>	<b>20. SECTION 5311 PROGRAM REQUIREMENTS</b>
No significant changes.	Moved background and resource questions to issues/areas of concern for FTA.	No significant changes.	No significant changes.
	In question 5311:1, added an indicator for eligibility of directly operated service.		
	In question 5311:2, removed the indicator for the fair and equitable distribution of funds.		
	Eliminated question regarding use of privately provided intercity bus service as in-kind match.		

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