



Grant Compliance From An Intercity Bus Operator's Perspective

December 2025—RTAP Annual Conference

Helping your agency achieve compliance



- LOTS of regulations and contract provisions to comply with
- Today, will focus on how to deliver a compliance program that has a meaningful chance of achieving compliance
- Not going to focus on the technical aspects of compliance
- Will try and help you deliver something that your organization can realistically implement

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Break it up into meaningful sections

Procurement

Drug &
Alcohol

Maintenance

Operations

Civil Rights

Financial

Governance—
everything
else goes here

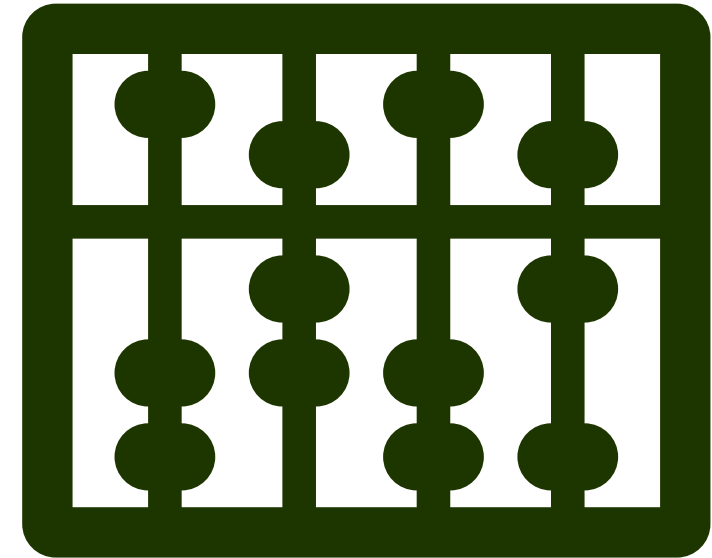
*It has to be based on how your
agency functions.*



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Use a “least common denominator” approach

- Focus on the smallest or simplest commonality between contract/states/requirements
- This allows for comparison, combination, or integration of compliance requirements
- Unless a requirement is unduly burdensome, the broadest requirement becomes the standard for ease of implementation
 - Example: If some reporting is required monthly and others quarterly but the content is similar, go with monthly and include all requested information



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State what's in and what's out to accurately set expectations



Some aspects of a compliance program need to be built into the written compliance program but do not require detailed processes



Make sure you communicate that the requirements still exist but that you know that they are satisfied with existing processes and policies and point to those



Do not assume that everyone know what's out

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Keep It Simple

If we **don't** keep things simple → people **won't** use it

Don't deliver a compliance document that:

- looks like an auditor wrote it
- uses language no one understands
- is so long that no one will read it
- has no relation to how you do business

You should strive for a program that is geared to your audience and that will get results

Remember your audience

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Basic Requirements

- Don't set up requirements that your systems cannot support

Automate It

- Try to automate as much as possible and remove human error

Tickler System

- Develop triggers to remind functions of compliance obligations

Assign Functions

- Assign responsibilities to **functions**—not individuals—*this will outlive staff changes*

Spoon feed the key components

- Deliver a user-friendly policy
 - Make it searchable so someone can go straight to the relevant topic
 - Include links to documents, clauses, forms, etc.
 - Don't just use a lot of narrative; use key terms and sortable spreadsheets



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Introduce it as part of “live” training



Walk people through it before you send it out

Otherwise, people will be afraid to open it



Seek feedback and buy-in before you roll it out

If you have support and input before you send it out, people will feel like they had a say in it and will embrace it

It is also a way to get feedback on the most efficient way to achieve compliance

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Sample compliance program components

Searchable matrix with detailed requirements tagged by area

PowerPoint/training to introduce each section

Links to required policies, procedures and contract provisions

- Use links to current documents instead of sending as attachments—you will lose track of the current version and people will be sending out stale documents

Require annual review/update of all policies

Provide a simple check-list for procurement by procurement level

Recognize that intercity bus is different and more complicated

Regulations are largely written for public transit/transportation

operates within a single state

entire operation is subject to a federal subsidy

ICB is not public transportation by definition

certain requirements do not apply (i.e. TAM plans)

Multi-state operations complicate things

Some states use thresholds for certain types of reporting based on the # of employees within a state, but the threshold for other issues is national

You may have a contract/grant in a state where you don't have employees (i.e. driver base may be in a neighboring state)

Multiple & sometimes overlapping governing agencies & rules

Different agency requirements—e.g., FTA vs FMCSA for Drug & Alcohol reporting—means you have to make adjustments

- National or multi-state pool vs. state reporting can skew random test results

Different definitions for serving customers with disabilities between DOJ & DOT (e.g., service animal)



FTA post-accident testing requirements - differ somewhat from FMCSA but need to be implemented

Don't have multiple Title VI plans for different states

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Learn from the past

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Focus on areas that have been pitfalls in prior compliance reviews

- *It is hard to ask for forgiveness twice!*

Look at common findings for agencies in general

- E.g., drug & alcohol, procurement



Questions?

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