

November 13, 2025

BCC Agenda Date/Item: _____

Board of County Commissioners
Clackamas County

Approval of an Amendment to an Intergovernmental Agreement with TriMet for transportation to essential services for seniors and individuals with disabilities. Amendment Value is \$280,402 for 8 months. Total Agreement Value is \$667,119 for 2 years. Funding is through TriMet. No County General Funds are involved.

Previous Board Action/Review	• Original Agreement March 20, 2025, Agenda Item 20250320 III.D.10		
Performance Clackamas	Safe, Secure, and Livable Communities		
Counsel Review	Yes: Ryan Hammond	Procurement Review	No
Contact Person	Tracy Garell	Contact Phone	971 610- 8183

EXECUTIVE SUMMARY: The Social Services Division of the Health, Housing, and Human Services Department requests approval of Amendment #01 to a revenue Agreement with TriMet to fund Transportation Reaching People (TRP) operations for Fiscal Year 26.

Transportation services are offered to area seniors and persons with disabilities who have limited or no access to public transportation. Transportation services provide a link for residents to access other services that meet their individual needs. This helps them to remain independent and involved in the community as long as possible.

The Amendment will update the Agreement's scope to include contracted transportation services that meet the unmet ride needs of older adults and individuals with disabilities. The Amendment will extend the effective date and provide an additional \$280,402 in Agreement value for FY26 5310 allocation. The original Agreement supports TRP operations for FY25.

The total agreement value increased to \$667,119. No County General Funds are involved.

RECOMMENDATION: Staff respectfully requests that the Board of County Commissioners approve Amendment #01 (11909) and authorize Chair Roberts or his designee to sign on behalf of Clackamas County.

Respectfully submitted,

Mary Rumbaugh

Mary Rumbaugh
Director of Health, Housing, and Human Services

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MODIFICATION No. 1
INTERGOVERNMENTAL AGREEMENT Between
TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TriMet) and CLACKAMAS
COUNTY, SOCIAL SERVICES DIVISION (Subrecipient)

Agreement No. GO250803GS Mod-1

Effective on and after July 1, 2025, this Modification No. 1 makes the changes described below to Agreement No. GO250803GS between the **Tri-County Metropolitan Transportation District of Oregon (TriMet)** and **Clackamas County (County)**, in order to pass through certain funds provided to TriMet by the FTA under 49 U.S.C. §5310 (Section 5310 funds) to the County's Social Services Division (Sub-recipient), for Transportation Operating Expenses that benefit Older Adults and Persons with Disabilities.

I. MODIFICATIONS TO ORIGINAL AGREEMENT:

- 1. Paragraph 6. Workers Compensation.** "Paragraph 6. Workers Compensation," and its accompanying text in the original Agreement is re-designated as subparagraph "**C. Workers Compensation**" and its title and accompanying text is inserted within **Paragraph 7. Insurance**, immediately after subparagraph 7.B.
- 2.** Immediately after **Paragraph 5**, a new paragraph, designated "**Paragraph 6. Rider Eligibility Documentation, Data Collection, Quality Assurance, and Reporting**," is inserted as follows:

Paragraph 6. Rider Eligibility Documentation, Data Collection, Quality Assurance, and Reporting.

A. Rider Eligibility Documentation.

Sub-recipients of Federal 5310 funds shall ensure that all transportation services funded in whole or in part by these funds are provided exclusively to the following eligible populations:

- a)** Individuals who are 65 years of age or older, and/or
- b)** Individuals with disabilities, as defined by the Americans with Disabilities Act (ADA), whose disability affects their ability to use or navigate fixed-route public transit services independently, either permanently or under certain conditions.

Sub-recipients must implement, or have existing, a documented intake or trip scheduling process to request, record, and securely maintain eligibility data for all riders utilizing 5310-funded services, if and unless, a subset of those services are provided to general public riders (ride-about or shuttle trips) for whom registration for services is not required, but where the intended audience is older adults 65+ and/or people with fixed-route travel limiting disabilities.

B. Data Collection Guidance.

- a) Age Verification Data Collection:** Sub-recipients shall request and record the rider's date of birth at the time of initial service request or registration. Riders must be informed this information is required for service eligibility verification under Federal 5310 program guidelines.
- b) Disability Status Data Collection:**
 - i.** Sub-recipients must document whether a rider has a disability that:
 - 1.** Prevents them from independently accessing or using fixed-route transit services, or

2. Requires them to use specialized transportation services under certain conditions (e.g., specific mobility impairments, cognitive disabilities, vision or hearing loss, or other ADA-qualified limitations).
- ii. Disability status may be self-reported, determined via eligibility for complementary paratransit, or confirmed through a referral from a healthcare or social services professional, when appropriate and feasible.
- iii. The data must be collected in a manner that:
 1. Protects the individual's privacy and complies with HIPAA and applicable data security standards.
 2. Avoids requiring disclosure of specific medical diagnoses.
 3. Focuses on functional ability in relation to fixed-route transit access and use.

C. Quality Assurance Plan.

Sub-recipients must develop and implement a documented Quality Assurance Plan to ensure the accuracy, completeness, and consistency of rider eligibility data collection and reporting.

At minimum, the Plan shall include:

- a) Initial Staff Training on eligibility criteria, data collection protocols, and privacy protections.
- b) Quarterly Data Audits of a random sample of service records to confirm:
 - i. Rider age and/or disability status were documented where required.
 - ii. Disability status appropriately reflects functional limitations affecting fixed-route access, not solely medical diagnoses.
- c) Annual Review of data collection procedures and reporting accuracy.
- d) Corrective Action Procedures if discrepancies or incomplete records are identified.
- e) Maintenance of audit results and corrective actions for a minimum of three years for federal and state program review.

D. Reporting Requirements.

Sub-recipients must submit rider eligibility reports to the direct recipient, quarterly. Reports must include:

- a) Number of unduplicated riders by:
 - i. Age 65+
 - ii. Individuals with disabilities
 - iii. Riders who meet both criteria
- b) Summary of QA audit findings and any corrective actions taken.
- c) Origin location, either specific address point including street address, street name, city, zip code; and
- d) Destination location, either specific address point including street address, street name, city, zip code; or
- e) Customer eligibility status with TriMet LIFT, as evidenced by either of the following:
 - i. Customer Name, DOB, Address, Phone Number (for TriMet to query their systems and confirm); or
 - ii. Customer six digit LIFT Account Number, Name, Address, DOB.

3. Paragraph 10. Funding. Paragraph 10 of the original Agreement is deleted and replaced with the following:

- A.** As of the effective date of this Modification No. 1, the amount of \$106,315 allocated to the original Agreement was not expended. This existing amount and additional Section 5310 funds of \$280,402 to this Modification No. 1, for a total amount of \$386,717 for FY2026. The total award will increase to \$667,119 in lieu of \$386,717. All funding for FY26 will be Federal, and no match is required by the County.
- B.** Origin of Funds - Federal Section 5310 Formula funds and TriMet General Fund (See updated detail under Exhibit- A)
- C.** Of the total FY2026 funding, \$325,000 will be used for Traditional Mobility Management activities, including:
 - a)** Coordinating transportation services for older adults, individuals with disabilities, and individuals of low income, and ensuring their involvement in the process;
 - b)** Convening stakeholders and supporting multisector state and local partnerships to better coordinate transportation services;
 - c)** Developing and operating call centers to coordinate travel information, manage eligibility requirements, and arrange customer travel;
 - d)** Operating transportation brokerages to coordinate service providers, funding resources, and customer needs; and
 - e)** Planning and implementing the acquisition and purchase of intelligent transportation technologies to operate a coordinated system.
- D.** A separate \$50,000 of the FY2026 funding will be allocated to Traditional Eligible Mobility Management Activities including acquisition of transportation services under a contract, lease or other arrangement with the accessible Transportation Network Company, UZURV. As part of ongoing efforts to improve access to transportation for older adults and individuals with disabilities, Sub-recipient will conduct a pilot initiative in partnership with UZURV that will focus on addressing unmet ride requests (also known as ride denials) by leveraging UZURV's adaptive transportation platform to fulfill trips that cannot be accommodated through traditional scheduling. Data from the pilot initiative will be used to evaluate the effectiveness of UZURV services to reduce ride denials, which is expected to enhance overall service reliability and cost effectiveness of ride delivery.
- E.** The remaining \$11,717 Section 5310 funds allocated in FY2026 under Modification No. 1 will be used for Non-Traditional Volunteer Driver Programs.

4. Paragraph 11. Term. Paragraph 11 of the original Agreement is deleted and replaced by the following:

The Parties agree to extend the term of the Agreement. Modification No. 1 shall be effective from July 1, 2025 through June 30, 2026, unless terminated sooner under the provisions of the Agreement, or extended further pursuant to the Parties' mutual agreement.

- 5. Exhibit A-**revised and attached as part of this modification.
- 6. Exhibit C-** superseded and replaced with sections 2-3 above.

II. NO OTHER CHANGES

There are no additional changes to this Agreement. All other provisions of this Agreement No. GO250803GS remain the same as they are in the original Agreement.

III. CERTIFICATION

Sub-recipient certifies under penalty of perjury as provided in ORS 305.385(6) that it is not, to the best of its knowledge, in violation of any Oregon tax law. For the purposes of this certification, "Oregon Tax Laws" are state taxes imposed by ORS 320.005 to 320.150 and 403.200 to 403.250 and ORS Chapters 118, 314, 316, 317, 318, 321 and 323, and local taxes administered by the Oregon Department of Revenue under ORS 305.620.

IV. AGREEMENT

By executing below, the Parties agree to this Modification No. 1.

CLACKAMAS COUNTY

TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET)

(signature)

(signature)

Name: Craig Roberts,
Title: Chair, Clackamas County Board of
Commissioners

Name: Nancy Young-Oliver
Title: Chief Finance Officer / Executive
Director of Finance & Administrative
Services

Date:

Date:

Federal Provisions Check: ☒ Applicable
☐ Not Applicable

Approved as to Form:



TriMet Legal Counsel

Approved as to Legal Sufficiency:



County Counsel

Date: 10/16/2025

EXHIBIT A
PASS-THROUGH FUNDING INFORMATION FOR SUBRECIPIENTS:

In accordance with Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (2 CFR 200, Subpart D, Section 331), the following information is required of TriMet to communicate clearly in all its sub-awards:

1. Subrecipient Name: County of Clackamas
2. Subrecipient's Unique Entity ID (SAM): NVWKAVB8JND6
3. Federal Program or Title: Enhanced Mobility of Seniors and Individuals with Disabilities Grant Program- Section 5310
4. Federal Catalogue (CFDA) Number and Name: 20.513 - Enhanced Mobility of Seniors and Individuals with Disabilities Program
5. Federal Award Identification Number (FAIN): OR-2024-024 (FY23 Section 5310 Formula) and TBD (FY 24 Section 5310 Formula)
6. Expected Federal Funding to the Sub-recipient: FY25 award federal funds OR-2024-024 - \$175,000; FY26 award \$338,606.
7. Sub-award Period of Performance (start and end dates): 07/01/2024 - 06/30/2026
8. Federal Award Date (date TriMet was awarded funds by the agency): OR-2024-024 on 07/01/2024; and TBD for FY24 Section 5310 formula award.
9. Award R&D: No
10. Approved Indirect Cost Rate or De Minimis Rate: 10% de minimis rate
11. Name and Contact Information of Federal Awarding Agency (and pass-through agency if different):

U.S. Department of
Transportation Federal
Transit Administration
1200 New Jersey Ave, SE
4th & 5th Floors –
East Building
Washington, DC 20590

U.S. Department of Transportation
Federal Transit Administration
Region X Suite 3142
Federal Building
915 Second Avenue

12. Federal award project description: See description on Exhibit C of contract.
13. Federal laws, regulations or circulars that is expressly applicable to the funding source and project (but not limited to):
 - A. Master Agreement (49 U.S.C. Chapter 53 and Title 23)-The FTA Master Agreement contains the standard terms and conditions that apply to the underlying Agreement.
 - B. Grant Management Requirements (Circular 5010.1 E) - These requirements are intended to assist recipients in administering FT A-funded projects and in meeting award responsibilities and reporting requirements. Recipients have a responsibility to comply with regulatory requirements and to be aware of all pertinent material to assist in the management of federally assisted awards.
 - C. Enhanced Mobility of Seniors and Individuals with Disabilities Grant Program (Circular 9070.1G) - This circular issues guidance on the administration of the Enhanced Mobility of Seniors and Individuals with Disabilities Program under U.S.C. 5310.
 - D. Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (Title 2 -Grants and Agreements; Subtitle A - Office of Management and Budget Guidance for Grants and Agreements; Chapter II - Office of Management and Budget Guidance; Part 200). Establishes uniform administrative requirements, cost principles and audit requirements for Federal awards to non-Federal entities and establishes principles for determining the allowable costs incurred by non- Federal entities under Federal awards. The principles are designed to provide that Federal awards bear their fair share of costs.
14. Federal Funding Accountability and Transparency Act (FFATA) Sub-award Reporting

On September 26, 2006, the Federal Funding Accountability and Transparency Act (FFATA) was signed. The intent was to empower every American with the ability to hold the government accountable for each spending decision and to reduce wasteful spending in the government. As the Federal prime awardee, Tri-County Metropolitan Transportation District of Oregon (TriMet) is required to report certain information on first-tier sub-awards equal to or greater than \$25,000. That information will be made available to the public via a single, searchable website, which is www.USASpending.gov. TriMet is also required to file a FFATA sub-award report by the end of the month following the month in which TriMet executes the sub-award.

Legal entity name: County of Clackamas

Data Universal Number System (DUNS) number: 096992656

Unique Entity ID (SAM) number: NVWKAVB8JND6

A. Executive compensation

Executive compensation information is also required to determine whether or not the following information must be reported in FSRS:

1. In your organization's previous fiscal year, did your organization receive 80% or more of its annual gross revenue and \$25,000,000 or more in federal procurement contracts, subcontracts, loans, grants, sub-grants, cooperative agreements and federal financial assistance awards subject to the Transparency Act? (Include parent organization, all branches, and all affiliates worldwide.)

☐ Yes ☒ No

If "yes" proceed to B. If "no," no further action is required and submittal of this form is not required.

2. Does the public have access to information about the compensation of the senior executives in your organization (including parent organization, all branches, and all affiliates worldwide) through periodic reports filed under section 13(a) or 15(d) of the Securities and Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986?

☐ Yes ☐ No

If "yes," provide a link to the SEC: <http://www.sec.gov> where this information is located and return form to the ODOT contact shown at the bottom of this form.

Provide link here: <https://rideconnection.org/about-us/policies-reports>

If "no," provide compensation information below.

Names and annual compensation amounts of the five most highly compensated executives:

1.	\$
2.	\$
3.	\$
4.	\$
5.	\$

Business entity contact information (person completing form):

Aryn Zanca, Management Analyst 1

8/20/25

Type name/Title

Date