



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION IV
Alabama, Florida, Georgia,
Kentucky, Mississippi,
North Carolina, Puerto
Rico, South Carolina
Tennessee, Virgin Islands

230 Peachtree Street, NW
Suite 800
Atlanta, GA 30303-1512
404-865-5600
404-865-5605 (fax)

Mr. Brian DeQuincey Newman
Chair
Central Midlands Regional Transit Authority
3613 Lucius Road
Columbia, SC 29201

NOV 04 2014

Re: Federal Transit Administration FY 2014 Triennial Review – Final Report

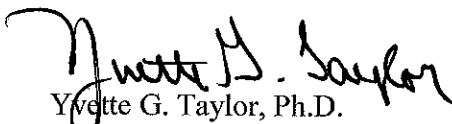
Dear Mr. Newman:

This report documents the Federal Transit Administration's (FTA) Triennial Review of the Central Midlands Regional Transit Authority (CMRTA), in Columbia, South Carolina. This review is required by Chapter 53 of Title 49, United States Code, Section 5307. Although less exacting than an audit, the Triennial Review is the FTA's assessment of CMRTA's compliance with federal requirements, determined by examining a sample of grant management and program implementation practices. As such, the Triennial Review is not intended as, nor does it constitute, a comprehensive and final review of compliance with grant requirements.

The Triennial Review focused on CMRTA's compliance in 17 areas. No deficiencies were found with the FTA requirements in 16 areas. Deficiencies were found in one area: Satisfactory Continuing Control. CMRTA had no repeat deficiencies from the 2011 Triennial Review. The deficiency and corrective actions to be taken are described in the final report.

Thank you for your cooperation and assistance during this Triennial Review. If you need any technical assistance or have any questions, please do not hesitate to contact Lauren Pessoa at 404-865-5488 or Lauren.Pessoa@dot.gov.

Sincerely,


Yvette G. Taylor, Ph.D.
Regional Administrator

Enclosure

cc: Janice Abaray, FTA, Program Manager
Lauren Pessoa, Transportation Program Specialist
Robert A. Schneider, Ph.D., CMRTA, Executive Director

FINAL REPORT

FY2014 TRIENNIAL REVIEW

of the

**Central Midlands Regional Transit Authority
(CMRTA)
Columbia, South Carolina
Recipient ID: 6558**

Performed for:

**U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION
REGION IV**

Prepared by:

CDI/DCI Joint Venture

Scoping Meeting Date: April 30, 2014

Site Visit Dates: August 28-29, 2014

Draft Report Date: September 30, 2014

Final Report Date: November 4, 2014

Table of Contents

| | |
|---|----|
| I. Executive Summary | 1 |
| II. Review Background and Process | 2 |
| 1. Background..... | 2 |
| 2. Process | 2 |
| 3. Metrics..... | 2 |
| III. Grantee Description..... | 4 |
| IV. Results of the Review | 6 |
| 1. Financial Management and Financial Capacity..... | 6 |
| 2. Technical Capacity..... | 6 |
| 3. Maintenance | 6 |
| 4. Americans with Disabilities Act | 6 |
| 5. Title VI..... | 7 |
| 6. Procurement..... | 7 |
| 7. Disadvantaged Business Enterprise | 7 |
| 8. Legal | 7 |
| 9. Satisfactory Continuing Control..... | 8 |
| 10. Planning/Program of Projects..... | 8 |
| 11. Public Comment on Fare Increases and Major Service Reductions | 9 |
| 12. Half Fare | 9 |
| 13. Charter Bus | 9 |
| 14. School Bus..... | 9 |
| 15. Security | 9 |
| 16. Drug Free Workplace and Drug and Alcohol Program..... | 10 |
| 17. Equal Employment Opportunity | 10 |
| V. Summary of Findings..... | 11 |
| VI. Attendees..... | 13 |
| VII. Appendices | 14 |

I. Executive Summary

This report documents the Federal Transit Administration's (FTA) Triennial Review of Central Midlands Regional Transit Authority (CMRTA), Columbia, South Carolina. The review was performed by CDI/DCI Joint Venture. During the site visit, administrative and statutory requirements were discussed and documents were reviewed. CMRTA's transit facilities were toured to provide an overview of activities related to FTA-funded projects.

The Triennial Review focused on CMRTA's compliance in 17 areas. Two Enhanced Review Modules (ERMs) were conducted in the areas of Financial Management and Procurement. Deficiencies were found in the areas listed below.

| Review Area | Deficiencies | |
|---------------------------------|--------------|---|
| | Code | Description |
| Satisfactory Continuing Control | D-99 | Failure to comply with property disposal requirements |

II. Review Background and Process

1. Background

The United States Code, Chapter 53 of Title 49, requires the FTA of the United States Department of Transportation (USDOT) to perform reviews and evaluations of Urbanized Area Formula Grant activities at least every three years. This requirement is contained in 49 U.S.C. 5307(i). This review was performed in accordance with FTA procedures (published in FTA Order 9010.1B, April 5, 1993). At least once every three years, the Secretary shall review and evaluate completely the performance of a grantee in carrying out its program, specifically referring to compliance with statutory and administrative requirements.

The Triennial Review includes a review of the grantee's compliance in 17 areas. The basic requirements for each of these areas are summarized in Section IV.

This report presents the findings from the Triennial Review of Central Midlands Regional Transit Authority (CMRTA) in Columbia, South Carolina. The review concentrated on procedures and practices employed during the past three years; however, coverage was extended to earlier periods as needed to assess the policies in place and the management of grants. The specific documents reviewed are referenced in this report and are available at FTA's regional office or at the grantee's office.

2. Process

The Triennial Review process includes a pre-review assessment, a review scoping meeting with the FTA regional office, and an on-site visit to the grantee's location. The review scoping meeting was conducted with the Region IV Office on April 30, 2014. Necessary files retained by the regional office were sent to the reviewer electronically. A review package was sent to CMRTA advising it of the site visit and indicating information that would be needed and issues that would be discussed. The site visit to Columbia, South Carolina occurred on August 28-29, 2014.

The onsite portion of the review began with an entrance conference, in which the purpose of the Triennial Review and the review process were discussed. The remaining time was spent discussing administrative and statutory requirements and reviewing documents. A tour of CMRTA's transit facilities was conducted to provide an overview of activities related to FTA-funded projects. A sample of maintenance records for FTA-funded vehicles and equipment was also examined during the site visit. Two ERMs were conducted in the areas of Financial Management and Procurement. Upon completion of the review, a summary of preliminary findings was provided to CMRTA at an exit conference. The individuals participating in the review are listed in Section VI of this report.

3. Metrics

The metrics used to evaluate whether a grantee is meeting the requirements for each of the areas

reviewed are:

- *Not Deficient*: An area is considered not deficient if, during the review, no findings were noted with the grantee's implementation of the requirements.
- *Deficient*: An area is considered deficient if all of the requirements within the area reviewed were not met.
- *Not Applicable*: An area can be deemed not applicable if, after an initial assessment, the grantee does not conduct activities for which the requirements of the respective area would be applicable.

III. Grantee Description

Organization

The Central Midlands Regional Transit Authority (CMRTA) of Columbia, South Carolina provides transit service in the cities of Columbia, Cayce, West Columbia, and Forest Acres, as well as the towns of Springdale and Arcadia Lakes and portions of unincorporated Richland and Lexington Counties. CMRTA is designated a regional transit authority and a direct grantee by the Central Midlands Council of Governments, the local MPO and designated recipient. CMRTA currently contracts with Veolia Transportation to manage and operate both the fixed route and paratransit services. The population of the service area is approximately 390,000.

Services

CMRTA operates a network of 21 fixed routes. Service is provided weekdays 5:00 a.m. to 10:100 p.m. and Saturdays and Sundays from 6:30 a.m. to 8:00 p.m. The grantee’s complementary paratransit service, known as DART, operates during the same days and hours of service as the fixed routes.

The basic adult fare for bus service is \$1.50. A reduced fare of \$0.75 is offered to individuals with disabilities, persons 65 years of age and older, and Medicare cardholders. The fare for ADA paratransit service is \$3.00.

CMRTA operates a fleet of 39 fixed-route vehicles, all with FTA interest. The bus fleet consists of standard 30-, 35-, and 40-foot transit coaches. The current peak requirement is for 28 vehicles. CMRTA also has a fleet of 20 FTA-funded vans used for ADA paratransit service.

CMRTA operations and maintenance staff are located in the Lowell C. Spires Regional Transit Facility at 3613 Lucius Road in Columbia. The service is oriented around a Downtown Transit Center located at 1727 Sumter St. Both facilities have FTA interest.

Grant Activity

Below is a list of CMRTA’s active grants at the time of the review.

| Grant Number | Grant Amount | Date Executed | Description |
|---------------|--------------|---------------|---|
| SC-03-045-00 | \$852,175 | 8/17/07 | Oper/Maint/Admin Facility Construction |
| SC-90-X210-00 | \$3,838,851 | 9/22/10 | FY09/10 PM/Maint/Training/ADP Software/Hardware |
| SC-90-X247-01 | \$6,050,445 | 8/17/12 | FY09 5307 PM 2010-11, ADA, Transit Enhancements |
| SC-90-X267-00 | \$3,184,119 | 8/23/13 | 5307 Capital Grant using FY2010 dollars |
| SC-96-X010-01 | \$5,346,374 | 3/8/10 | Veh Acq(10),Veh Rehab(10),OA(01) |
| SC-03-045-00 | \$852,175 | 8/17/07 | Oper/Maint/Admin Facility Construction |
| SC-90-X210-00 | \$3,838,851 | 9/22/10 | FY09/10 Prev. Maint/Training/ ADP Software/Hardware |

Completed Projects

ARRA funds were used to install ADA-approved digital signage at the transit center as well as for the development of a rebranding of the agency to The COMET. The website was redesigned to be more user-friendly. Funds were also used to refurbish the interior and exteriors of eight transit buses, including the incorporation of a new logo.

Projects Underway

Current projects include the purchase of bus stop shelters along with upgrades to the administration and maintenance facility, including the addition of two maintenance bays. The purchase of eleven propane-fueled cutaway vehicles is on-going as well as additions to and replacement of bus stop signage.

Future Projects

Additional fixed route and paratransit vehicle purchases are planned to meet the needs of a projected increase in ridership.

IV. Results of the Review

1. Financial Management and Financial Capacity

Basic Requirement: The grantee must demonstrate the ability to match and manage FTA grant funds, cover cost increases and operating deficits, cover maintenance and operational costs for FTA funded facilities and equipment, as well as conduct and respond to applicable audits.

Finding: During this Triennial Review of CMRTA, no deficiencies were found with the FTA requirements for Financial Management and Financial Capacity. An ERM was performed in Financial Management due to past issues with adequate sources of non-federal funding. At the time of the review, additional funding had been secured through the passage of a sales tax initiative and local funding was no longer considered an area of immediate concern.

2. Technical Capacity

Basic Requirement: The grantee must be able to implement FTA funded projects in accordance with the grant application, Master Agreement, and all applicable laws and regulations, using sound management practices.

Finding: During this Triennial Review of CMRTA, no deficiencies were found with the FTA requirements for Technical Capacity.

3. Maintenance

Basic Requirement: Grantees and subrecipients must keep federally funded vehicles, equipment and facilities in good operating condition. Grantees and subrecipients must keep ADA accessibility features on all vehicles, equipment and facilities in good operating order.

Finding: During this Triennial Review of CMRTA, no deficiencies were found with the FTA requirements for Maintenance.

4. Americans with Disabilities Act

Basic Requirement: Titles II and III of the Americans with Disabilities Act of 1990 (ADA) provide that no entity shall discriminate against an individual with a disability in connection with the provision of transportation service. The law sets forth specific requirements for vehicle and facility accessibility and the provision of service, including complementary paratransit service.

Finding: During this Triennial Review of CMRTA, no deficiencies were found with the USDOT requirements for ADA.

5. Title VI

Basic Requirement: The grantee must ensure that no person shall, on the grounds of race, color, or national origin, be excluded from participating in, or be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance without regard to whether specific projects or services are federally funded. The grantee must ensure that federally supported transit services and related benefits are distributed in an equitable manner.

Note: The 2014 Triennial Review covers a three-year period in which the FTA issued a revised circular for Title VI, which provided more information on how to comply and changed requirements for some grantees with populations over 200,000 persons. As of October 1, 2012, grantees must comply with the requirements of FTA C 4702.1B. The Triennial Review will look at compliance with the requirement of FTA C 4702.1A for the period prior to October 1, 2012, and compliance with the revised circular for activities after this date.

Finding: During this Triennial Review of CMRTA, no deficiencies were found with the FTA requirements for Title VI.

6. Procurement

Basic Requirement: Grantees use their own procurement procedures that reflect applicable state and local laws and regulations, provided that the process ensures competitive procurement and the procedures conform to applicable federal law, including 49 CFR Part 18 (specifically Section 18.36) and FTA Circular 4220.1F, “Third Party Contracting Guidance.”

Finding: During this Triennial Review of CMRTA, no deficiencies were found with the FTA requirements for Procurement. An ERM was performed in Procurement due to publicized issues regarding a recent procurement solicitation. The solicitation had been retracted by the time of the review and was in the process of being reissued in conformance with the requirements of FTA C 4220.1F.

7. Disadvantaged Business Enterprise

Basic Requirement: The grantee must comply with 49 CFR Part 26 to ensure nondiscrimination in the award and administration of DOT-assisted contracts. Grantees also must create a level playing field on which DBEs can compete fairly for DOT-assisted contracts.

Finding: During this Triennial Review of CMRTA, no deficiencies were found with the USDOT requirements for DBE.

8. Legal

Basic Requirement: The grantee must be eligible and authorized under state and local law to request, receive, and dispense FTA funds and to execute and administer FTA funded projects.

The authority to take actions and responsibility on behalf of the grantee must be properly delegated and executed. Grantees must comply with Restrictions on Lobbying requirements.

Finding: During this Triennial Review of CMRTA, no deficiencies were found with the FTA requirements for Legal.

9. Satisfactory Continuing Control

Basic Requirement: The grantee must ensure that FTA-funded property will remain available to be used for its originally authorized purpose throughout its useful life until disposition.

Finding: During this Triennial Review of CMRTA, deficiencies were found with the FTA requirements for Satisfactory Continuing Control. Federal regulations require that grantees either reimburse FTA proportionally for items valued greater than \$5,000 that have reached the end of their useful life or receive permission for retaining or reallocating the funds. Insurance proceeds may generally be applied toward the purchase of replacement vehicles. On September 12, 2013 CMRTA received insurance compensation in the amount of \$15,269 for a 2002 Bluebird bus destroyed by fire on February 25, 2013 and on March 3, 2014 received insurance compensation in the amount of \$18,695.89 for a second 2002 Bluebird bus totaled in a collision on November 11, 2011. Both vehicles were beyond their useful life at the time of loss. The insurance proceeds were deposited in the general fund account and FTA was not notified.

Corrective Action(s) and Schedule: By February 2, 2015, CMRTA will provide FTA Region IV with complete asset information on the two vehicles removed from service due to catastrophic loss and work with FTA Region IV for approval in applying the insurance proceeds to the replacement of the vehicles or return an amount equal to the remaining federal interest, including any interest that may be owed the U. S. Treasury. The federal interest is not dependent on the extent of insurance coverage or on the insurance adjustment received. CMRTA will also provide supporting documentation that it has updated its policy and procedures to ensure that FTA Region IV will be notified of any future loss that involves FTA interest as required.

10. Planning/Program of Projects

Basic Requirement: The grantee must participate in the transportation planning process in accordance with FTA requirements, MAP-21, and the metropolitan and statewide planning regulations. Grantees must participate in a coordinated public transit-human services transportation planning process that identifies the transportation needs of individuals with disabilities, older adults, and people with low incomes; provides strategies for meeting those local needs; and prioritizes transportation services for funding and implementation. Each recipient of a Section 5307 grant shall develop, publish, afford an opportunity for a public hearing on, and submit for approval, a POP.

Finding: During this Triennial Review of CMRTA, no deficiencies were found with the FTA requirements for Planning/POP.

11. Public Comment on Fare Increases and Major Service Reductions

Basic Requirement: Section 5307 grantees are expected to have a written, locally developed process for soliciting and considering public comment before raising a fare or carrying out a major transportation service reduction.

Finding: During this Triennial Review of CMRTA, no deficiencies were found with the FTA requirements for Public Comment on Fare Increases and Major Service Reductions.

12. Half Fare

Basic Requirement: For service supported with Section 5307 assistance, fares charged elderly persons, persons with disabilities or an individual presenting a Medicare card during off peak hours will not be more than one half the peak hour fares.

Finding: During this Triennial Review of CMRTA, no deficiencies were found with the FTA requirements for Half Fare.

13. Charter Bus

Basic Requirement: Grantees are prohibited from using federally funded equipment and facilities to provide charter service if a registered private charter operator expresses interest in providing the service. Grantees are allowed to operate community based charter services excepted under the regulations.

Finding: During this Triennial Review of CMRTA, no deficiencies were found with the FTA requirements for Charter Bus.

14. School Bus

Basic Requirement: Grantees are prohibited from providing exclusive school bus service unless the service qualifies and is approved by the FTA Administrator under an allowable exemption. Federally funded equipment or facilities cannot be used to provide exclusive school bus service. School tripper service that operates and looks like all other regular service is allowed.

Finding: During this Triennial Review of CMRTA, no deficiencies were found with the FTA requirements for School Bus.

15. Security

Basic Requirement: As recipients of Section 5307 funds, grantees must annually certify that they are spending at least one percent of such funds for transit security projects or that such expenditures for security systems are not necessary.

Finding: During this Triennial Review of CMRTA, no deficiencies were found with the FTA requirements for Security.

16. Drug Free Workplace and Drug and Alcohol Program

Basic Requirement: All grantees are required to maintain a drug-free workplace for all employees and to have an ongoing drug-free awareness program. Grantees receiving Section 5307, 5309 or 5311 funds that have safety-sensitive employees must have a drug and alcohol testing program in place for such employees.

Finding: During this Triennial Review of CMRTA, no deficiencies were found with the FTA requirements for Drug-Free Workplace and Drug and Alcohol Program.

17. Equal Employment Opportunity

Basic Requirement: The grantee must ensure that no person in the United States shall on the grounds of race, color, religion, national origin, sex, age, or disability be excluded from participating in, or denied the benefits of, or be subject to discrimination in employment under any project, program, or activity receiving federal financial assistance under the federal transit laws. (Note: EEOC's regulation only identifies/recognizes religion and not creed as one of the protected groups.)

Finding: During this Triennial Review of CMRTA, no deficiencies were found with the FTA requirements for Equal Employment Opportunity (EEO).

V. Summary of Findings

| Review Area | Finding | Deficiency | Corrective Action | Response Date | Date Closed |
|--|---------|---|--|------------------|-------------|
| 1. Financial Management and Financial Capacity | ND | | | | |
| 2. Technical Capacity | ND | | | | |
| 3. Maintenance | ND | | | | |
| 4. ADA | ND | | | | |
| 5. Title VI | ND | | | | |
| 6. Procurement | ND | | | | |
| 7. DBE | ND | | | | |
| 8. Legal | ND | | | | |
| 9. Satisfactory Continuing Control | D-99 | Failure to comply with property disposal requirements | Provide FTA Region IV with complete asset information on the two vehicles removed from service due to catastrophic loss and work with FTA Region IV for approval in applying the insurance proceeds to the replacement of the vehicles or return an amount equal to the remaining federal interest, including any interest that may be owed the U. S. Treasury. The federal interest is not dependent on the extent of insurance coverage or on the insurance adjustment received. CMRTA will also provide supporting documentation that it has updated its policy and procedures to ensure that FTA Region IV will be notified of any future loss that involves FTA interest as required. | February 2, 2015 | |
| 10. Planning/ POP | ND | | | | |
| 11. Public Comment on Fare Increase and Major Service Reductions | ND | | | | |
| 12. Half Fare | ND | | | | |
| 13. Charter Bus | ND | | | | |
| 14. School Bus | ND | | | | |
| 15. Security | ND | | | | |

| Review Area | Finding | Deficiency | Corrective Action | Response Date | Date Closed |
|--|----------------|-------------------|--------------------------|----------------------|--------------------|
| 16. Drug-Free Workplace/ Drug and Alcohol Program | ND | | | | |
| 17. EEO | ND | | | | |

VI. Attendees

| Name | Title/Organization | Phone Number | E-mail Address |
|--|--|--------------|--|
| Central Midlands Regional Transit Authority | | (803) | |
| Robert A. Schneider, Ph.D. | Executive Director | 255-7087 | bob.schneider@catchTheCOMET.org |
| Michelle Ransom | Grants and Contracts Administrator | 255-7134 | michelle.ransom@catchTheCOMET.org |
| Daphne Givens | Accounting/Finance Director | 255-7131 | daphne.givens@catchTheCOMET.org |
| Virginia Goodson | Project Implementation Specialist | 255-7133 | virginia.goodson@catchTheCOMET.org |
| J. Kenneth Shealy | Project Management / Financial Consulting Services | 782-2615 | kenshealy@aol.com |
| M. Elizabeth Crum | Attorney, McNair Attorneys | 799-9800 | lcrum@mcnair.net |
| Amber B. Carter | Associate, McNair Attorneys | 799-9800 | acarter@mcnair.net |
| Da'Veda Sistrunk | Rural Transportation Planner | 255-7133 | daveda.sistrunk@catchTheComet.org |
| Sandra McKinley | DART Manager, Veolia Transportation | 255-7090 | sandra.mckinley@veoliatrtransportation.com |
| FTA (tele) | | (404) | |
| Janice Abaray | Program Manager | 865-5475 | Janice.Abaray@dot.gov |
| Lauren Pessoa | Transportation Program Specialist | 865-5488 | Lauren.Pessoa@dot.gov |
| Carlos Gonzalez | Regional Civil Rights Officer | 865-5471 | Carlos.Gonzalez3@dot.gov |
| Dwight Hill | Procurement Specialist | 865-5641 | Dwight.Hill.CTR@dot.gov |
| CDI/DCI Joint Venture | | | |
| Randall Pine | Reviewer | 785-841-7771 | Piner@earthlink.net |
| Claire Moreno | ERM / Financial Management | 619-793-5004 | Clairemoreno@outlook.com |
| Tom Mara | ERM / Procurement | 703-691-0868 | TMara@bmra.com |

VII. Appendices

No appendices included in this report.