



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

REGION IV
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Kentucky, Mississippi,
North Carolina, Puerto
Rico, South Carolina
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July 7, 2017

Ms. Ann Dawson August
Interim Executive Director
Central Midlands Regional Transit Authority
3613 Lucius Road
Columbia, SC 29201

Re: Federal Transit Administration (FTA) Fiscal Year 2017 Triennial Review Final Report

Dear Ms. August:

The enclosed final report documents the FTA's Triennial Review of the Central Midlands Regional Transit Authority (CMRTA) in Columbia, South Carolina. This review is required by Chapter 53 of Title 49. Although not 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 the CMRTA's compliance in 17 areas. No deficiencies were found with the FTA requirements in 8 areas. Deficiencies were found in 9 areas: Financial Management and Capacity, Technical Capacity, Maintenance, Americans with Disabilities Act (ADA), Procurement, Disadvantaged Business Enterprise (DBE), Satisfactory Continuing Control, Drug Free Workplace and Drug and Alcohol Program, and Equal Employment Opportunity. CMRTA had no repeat deficiencies from the 2014 Triennial Review. In response to the draft report, CMRTA submitted information to close out the finding in the Financial Management and Capacity area, one of the findings in the Technical Capacity area, and one of the findings in the Maintenance area.

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 Ms. Layana George, Program Manager, at 404-865-5638 or by email at layana.george@dot.gov.

Sincerely,

Yvette G. Taylor, Ph.D.
Regional Administrator

Enclosure

cc: Michelle Ransom, CMRTA

FINAL REPORT

**FISCAL YEAR 2017
TRIENNIAL REVIEW**

of

**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: January 18, 2017

Site Visit Date: May 3-4, 2017

Final Report Date: July 6, 2017

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I. Executive Summary

This report documents the Federal Transit Administration’s (FTA) Triennial Review of the Central Midlands Regional Transit Authority (CMRTA) in 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 the CMRTA’s compliance in 17 areas. Deficiencies were found in the areas listed below.

Review Area	Deficiencies	
	Code	Description
Financial Management and Capacity	D-142	ECHO documentation deficient
Technical Capacity	D-780	Associated Transit Improvement Report issues
	D-208	Inadequate oversight of subrecipient/third-party contractor/lessees
Maintenance	D-117	Facility/equipment maintenance program lacking or inadequate
	D-149	Late facility/equipment preventive maintenance
	D-191	Inadequate oversight of contracted maintenance activities
Americans with Disabilities Act (ADA)	D-165	Insufficient oversight ADA complementary paratransit
Procurement	D-340	Lacking independent cost estimate
	D-290	Lacking required justification and documentation for non-competitive award
	D-265	Pre-award and/or post-delivery certifications lacking
Disadvantaged Business Enterprise (DBE)	D-279	DBE public participation process deficiencies
	D-327	DBE uniform reports not submitted semi-annually or FTA comments not addressed
	D-778	No proportionate reduction of race-conscious goal
	D-162	Grantee does not monitor DBE compliance
Satisfactory Continuing Control	D-161	Excessive fixed-route bus spare ratio
Drug Free Workplace and Drug and Alcohol Program	D-157	Drug and Alcohol contractors, subrecipients, and/or lessees not properly monitored for D&A program
Equal Employment Opportunity (EEO)	D-31	Failure to adequately review EEO plans

II. Review Background and Process

1. Background

The United States Code, Chapter 53 of Title 49 (49 U.S.C. 5307(f) (2)) requires that “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.” This Triennial Review was performed in accordance with FTA procedures (published in FTA Order 9010.1B, April 5, 1993).

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 the 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 and referenced in this report are available at FTA’s regional office or the grantee’s office.

2. Process

The Triennial Review process includes a pre-review assessment, a 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 January 18, 2017. Necessary files retained by the regional office were sent to the reviewer electronically. A grantee information request and review package was sent to the CMRTA advising it of the site visit and indicating information that would be needed and issues that would be discussed. The site visit to the CMRTA occurred on May 3 and 4, 2017.

The onsite portion of the review began with an entrance conference, at 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. The reviewers visited the CMRTA’s operating and maintenance facility at 3613 Lucius Road to provide an overview of activities related to FTA-funded projects.

The reviewers examined a sample of procurement files and maintenance records for FTA-funded vehicles and equipment during the contractor’s site visit. Upon completion of the review, FTA and the reviewers provided a summary of preliminary findings to the CMRTA at an exit conference. Section VI of this report lists the individuals participating in the review.

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 any 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

1. 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, the towns of Springdale and Arcadia Lakes, and portions of unincorporated Richland and Lexington Counties. The Central Midlands Council of Governments, the local MPO, is the designated recipient of FTA funds for the Columbia urbanized area. CMRTA, a regional transit authority, is a direct recipient of FTA funds. The CMRTA Board of Directors is comprised of 11 voting members and 2 advisory members. There are two elected officials among the members. CMRTA currently contracts with TransDev, a private company, to manage and operate fixed route and paratransit services. The population of the service area is approximately 390,000 persons.

2. Services

CMRTA operates a network of 28 fixed routes. Service is provided weekdays 5:30 a.m. to 12:30 a.m. and Saturdays and Sundays from 5:30 a.m. to 10:25 p.m. The grantee's complementary paratransit service, known as DART, operates during the same days and hours of service as the fixed routes. TransDev provides CMRTA's fixed route bus service. CMRTA contracts with Transport Care Services, another private company, to provide the ADA complementary paratransit service. Maintenance of the vehicles used in the ADA service is performed by TransDev.

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 50 fixed-route vehicles, all with FTA interest. The bus fleet consists of cutaways, 30-foot, 35-foot, and 40-foot transit coaches. CMRTA also has a fleet of 21 cutaways and 2 minivans for ADA paratransit service. All of these vehicles were also purchased with FTA funds.

CMRTA administrative, operations and maintenance staff are located in the Lowell C. Spires Regional Transit Facility at 3613 Lucius Road in Columbia. This facility was built with FTA funds. The fixed-route service is oriented around a downtown Transit Center located at 1727 Sumter St. This facility was built with local funds.

CMRTA’s National Transit Database Report for fiscal year 2016 provided the following financial and operating statistics for its fixed-route and ADA complementary paratransit service:

Operating Statistic	Fixed-Route Service	ADA Complementary Paratransit Service
Unlinked Passengers	2,356,278	63,410
Revenue Hours	171,568	38,568
Operating Expenses	\$12,829,670	\$3,229,276

3. Grant and Project Activity

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

Grant Number	Grant Amount	Date Executed	Description
SC-90-X210-00	\$3,838,851	2010	FY2009/2010 Preventive Maintenance (PM)/Training/ADP Software/Hardware
SC-90-X247-01	\$6,050,445	2012	FY2009 5307 PM 2010-2011, ADA, Transit Enhancements
SC-90-X267-00	\$3,184,119	2013	Section 5307 Capital Grant using FY2010 dollars
SC-90-X278-00	\$2,726,659	2015	Section 5307 Funds for FY2011
SC-90-X291-00	\$3,628,881	2015	SC-FY2012-5307
SC-2016-013-00	\$438,767	2016	Section 5339 for Vehicle Replacement
SC-2016-014-00	\$3,761,714	2016	FY ‘13 Allocation PM Vehicle. Replacement & Vehicle. Expansion.

Projects Completed

In the past three years, CMRTA has added a 51-mile route to provide service to rural Lower Richland and city of Eastover and a flex route to rural Hopkins and Gadsden. It has also added five non-downtown routes to the system and 10 bus shelters and 17 bus benches.

Ongoing Projects

CMRTA is continuing the process of restructuring service to have main trunk lines connect with less frequent feeder routes. It has added Routes 45, 46, and 47 to trunk line Route 401, Route 32 to Route 301, and Route 62 and Route 63 to Route 601.

Future Projects

Over the next three to five years, CMRTA plans to continue restructuring its routes until there are eight main line routes (101 through 801) with associated feeder routes. It will also add downtown circulators and express routes to the service area.

IV. Results of the Review

1. Financial Management and 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, and conduct and respond to applicable audits.

Finding: During this Triennial Review of CMRTA, deficiencies were found with the FTA requirements for Financial Management and Capacity.

ECHO documentation deficient (142)

Grantees request Federal funds through ECHO. The grantee's records must support ECHO requests. The information should be traced back to an invoice for goods or services or timesheets, and be supported by information from the grantee's accounting system. A review of CMRTA's ECHO requests found that draws were made using the wrong Financial Purpose Code (FPC). For two of the examined draws for ADA paratransit expenses (FPC 08), draws were made applying the financial purpose code for capital funds (FPC 00). It should be noted that the grants where the incorrect FPC was applied included both capital and ADA operating projects.

In response to the draft report, CMRTA submitted procedures for documenting how future ECHO draws will be assigned to the correct Financial Purpose Code. Therefore, this finding is closed.

2. Technical Capacity

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

Finding: During this Triennial Review of CMRTA, deficiencies were found with the FTA requirements for Technical Capacity.

CMRTA has several Section 5307 grants with associated transit improvements. Therefore, it must submit annual Associated Transit Improvement Reports for these grants listing projects carried out in the preceding fiscal year. No such reports have been prepared and submitted by CMRTA via TrAMS. In response to the draft report, CMRTA submitted Associated Transit Improvement Reports for the past year in TrAMS and procedures for annually submitting the reports with the required information. Therefore, this finding is closed.

CMRTA has a private contractor that provides transit operations and maintenance services. It receives a monthly report from its contractor with ridership and financial information. However, CMRTA does not have a system for monitoring its contractor's compliance with a broad range of FTA requirements including maintenance, ADA complementary paratransit service, disadvantaged business enterprise, and drug and alcohol testing.

Corrective Actions and Schedule: By October 6, 2017, submit to the FTA regional office a comprehensive oversight program for overseeing its operations and maintenance contractor for compliance with Federal requirements. This program must identify performance measures, reconciliation method when performance measures are not meet, and on-going monitoring procedures.

3. Maintenance

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

Finding: During this Triennial Review of CMRTA, deficiencies were found with the FTA requirements for Maintenance.

CMRTA's management contractor, TransDev, maintains all of CMRTA's transit facilities and equipment including the FTA-funded administrative/operations/maintenance facility. TransDev has a facility maintenance plan. However, it is inadequate as it does not address roles and responsibilities, the facilities to be maintained, and the maintenance of ADA and security features. In addition, the plan only discusses inspections and not regular preventive maintenance activities. In response to the draft report, CMRTA submitted a revised Facility Maintenance Plan. A review of this plan found it to be acceptable. Therefore, this finding is closed.

At the site visit, no maintenance records could be provided by the contractor concerning maintenance activities conducted at the facilities other than monthly inspections completed in 2016. No other information on repairs, preventive maintenance activities, recent inspections, etc. was made available for review.

Grantees must have an effective mechanism for monitoring subrecipients', contractors', and lessees' maintenance activities. An acceptable program would consist of periodic written reports on maintenance activities submitted to the grantee, review of maintenance records, or periodic inspections of the FTA-funded vehicles and facilities. CMRTA does not have a monitoring program for its contractor's maintenance program. It does not receive any reports from its contractors on vehicle or facility maintenance, nor does it conduct reviews or inspections.

Corrective Actions and Schedule: By October 6, 2017, submit to the FTA office the following:

- Procedures for completing facility preventive maintenance inspections on time.
- A monthly report signed by the chief executive officer or other senior management designee on its facility/equipment preventive maintenance results until the data demonstrates it has conducted at least 80 percent of its facility/equipment preventive maintenance on time for three consecutive months. For the items reported on, submit a report listing the items, the dates the inspections are due, and the dates of the actual inspections. List the percentage of the

inspections performed on time. Submit back-up documentation for each item (e.g., copy of work order, printout from the maintenance management system) documenting the date of the inspection.

- Submit to FTA a vehicle and facility/equipment maintenance oversight program, along with evidence of its implementation such as meetings, reports, inspections, etc.

4. Americans with Disabilities Act

Basic Requirement: Titles II and III of the ADA of 1990 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, deficiencies were found with the U.S. Department of Transportation (US DOT) requirements for ADA.

Where a transit agency relies on another public entity to provide paratransit service on its behalf, the transit agency remains responsible for meeting the requirements of 49 CFR Part 37 Subpart F. In other words, the transit agency must ensure that the service provided on its behalf meets all of the requirements that the transit agency would be required to meet if the transit agency provided the service directly. The transit agency must have policies and procedures in place to monitor the performance of such service to ensure that these requirements are met.

ADA complementary paratransit service is provided by Transport Care Services under contract to TransDev, CMRTA's management/operations contractor. TransDev reports monthly to CMRTA on the financial and ridership aspects of the ADA complementary paratransit service. However, this reporting is not sufficient to ensure that the contractor is meeting the requirements of 49 CFR Part 37 Subpart F. Information on phone access, trip denials, late trips, missed trips, excessively long trips and other data to ensure that there are no capacity constraints are not being reported by the contractor.

In 2014, FTA conducted an ADA Complementary Paratransit Service Review of CMRTA. The purpose of this review was to ensure compliance with the ADA and the applicable departmental regulations. On December 14, 2015, FTA closed this review with one outstanding finding requiring corrective action. This closure/corrective action letter directed CMRTA to revise the language of its no-show the policy to clearly explain to the average rider when they will be suspended, taking into account frequency of travel and the number of trips. Although the letter directed CMRTA to FTA C. 4710.1 for technical assistance, no action was taken by CMRTA. Therefore, this no-show policy still does not clearly articulate the circumstances under which a rider would face the possibility of suspension, other than to state that the individual's trip record will be reviewed for a pattern or practice.

Corrective Action(s) and Schedule: By October 6, 2017, submit to the FTA Regional Civil Rights Officer (RCRO) the following:

- Procedures for ensuring that the contractors comply with the requirements of 49 CFR 37 Subpart F.

- A revised no-show suspension policy that clearly defines when a rider has established a pattern or practice of missing scheduled trips, and the duration of suspension for each occurrence.

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.

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, (repealed effective December 26, 2014), 2 CFR Part 1201, incorporating 2 CFR Part 200 (specifically Sections 200.317-200.326), and FTA Circular 4220.1F, “Third Party Contracting Guidance.”

Finding: During this Triennial Review of CMRTA, deficiencies were found with the FTA requirements for Procurement.

An Independent Cost Estimate (ICE) is a tool to assist in determining the reasonableness of the bid or proposal being evaluated; that is, to assist in performing the cost or price analysis. An ICE is the starting point for conducting a cost or price analysis. It is required for all procurements regardless of dollar amount. A review of four FTA-funded procurements found no evidence that ICEs were completed by CMRTA. It should be noted that CMRTA’s procurement procedures include the requirement for to conduct ICE’s. CMRTA intends to procure automatic passenger counters in late summer with FTA funds.

Grantees must conduct procurement transactions in a manner providing full and open competition. With a single bid, the documentation should include a cost analysis, as well as an explanation as to why a single bid was obtained. Upon receiving a single bid or proposal in response to a solicitation, the grantee should determine if competition was adequate. In 2016, CMRTA issued a request for proposal for schedule rack holders. Although it only received a single bid for this FTA-funded procurement CMRTA did not determine why a single bid was obtained.

A grantee purchasing revenue service rolling stock with Federal funds must conduct pre-award and post-delivery audits verifying compliance with Buy America provisions, purchaser’s requirements, and Federal Motor Vehicle Safety Standards (FMVSS). The grantee is required to keep records, including pre-award and post-delivery certifications, which show that the regulations have been followed. In 2016, CMRTA purchased eight buses. In response to the draft report,

CMRTA submitted executed pre-award certifications but no post-delivery certifications. Therefore, this finding remains open.

Corrective Action(s) and Schedule:

By August 30, 2017, submit to the FTA regional office:

- Signed post-delivery certifications for the procurement of 8 buses in 2016 and procedures for completing the applicable pre-award and post-delivery audits and certifications for future revenue rolling stock procurements.

By September 6, 2017, submit to the FTA regional office:

- Documentation that it has updated its procurement process to include development of independent cost estimates prior to receipt of bids or proposals. For the next procurement, submit to the FTA regional office documentation that the required process was implemented.

By October 6, 2017, submit to the FTA regional office the following:

- Evidence it has updated its procurement procedures to ensure that future single bid procurements are properly documented.
- Checklists that include ensuring Buy America “pre-award/post-delivery” audits are performed.

7. Disadvantaged Business Enterprise

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

Finding: During this Triennial Review of CMRTA, deficiencies were found with the US DOT requirements for DBE.

In establishing an overall three-year DBE goal, grantees must provide for public participation. This public participation must include consultation with minority, women's, and general contractor groups, community organizations, and other officials or organizations and a published notice announcing the proposed overall three-year goal. CMRTA submitted new goals to FTA in 2016. However, it did not conduct a public participation process during its goal-setting process. It did not conduct a consultative process or post the notice of its goal on its website.

Each grantee that meets the threshold requiring it to have a DBE program and overall goal is required to submit a Uniform Report of DBE Awards or Commitments and Payments semi-annually in TrAMS. Although CMRTA did submit the required reports in 2016, no reports were submitted in 2014 and 2015.

Grantees that obtain DBE participation that exceeds its overall goal for two consecutive years through the use of contract goals must reduce use of contract goals proportionately in the following

year. CMRTA's DBE goal of 5% was exceeded in both 2015 and 2016. The City did not make an adjustment in its DBE goal when submitting its goal for 2017 thru 2019.

Grantees must have a process to monitor contractors and subrecipients for compliance with CFR 26.37. Grantees must implement appropriate mechanisms to ensure compliance with the DBE program by all program participants (i.e., applying legal and contract remedies available under Federal, state, and local laws). These mechanisms must be set forth in the grantee's DBE program. CMRTA does not have a monitoring system for its contractors to assure compliance with the DBE requirements.

Corrective Action(s) and Schedule: By October 6, 2017, submit to the FTA RCRO the following:

- Timeline for facilitating public participation for its DBE goal setting, including a schedule for consultative meetings and a timeline for issuing a public notice on its website for future cycles.
- Implemented procedure to ensure that future semi-annual DBE reports are submitted on time and FTA comments are addressed.
- Procedures to proportionately reduce the use of race-conscious goals if it is exceeding its goals using race-conscious means.
- Update DBE Program with monitoring procedures that ensure contractors and subrecipients are in compliance with DBE Regulations. Provide evidence of implementation with remedies when noncompliance occurs.

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. 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.

For grantees with 50 or more fixed-route buses in urban service, a reasonable spare ratio should not exceed 20 percent of the vehicles operated in maximum fixed-route service. CMRTA has an active fleet of 50 vehicles for its fixed-route service. It has a peak fleet requirement of 37 vehicles resulting in 13 spare vehicles. This translates into a spare ratio of 35%.

Corrective Action and Schedule: By October 6, 2017, submit to the FTA regional office a plan for reducing CMRTA's spare ratio to 20 percent. The plan should include a spreadsheet listing, for each bus type, the number of buses, and, for each year until the spare ratio reaches 20 percent, the number of buses to be disposed of, the number of buses to be added, the projected peak requirement, and the projected spare ratio. The plan should include detailed justifications for future years in which spare ratios exceed 20 percent.

10. Planning/Program of Projects

Basic Requirement: The grantee must participate in the transportation planning process in accordance with FTA requirements, Fixing America's Surface Transportation (FAST) Act, and the metropolitan and statewide planning regulations. Each recipient of a Section 5307 grant shall develop, publish, afford an opportunity for a public hearing on, and submit for approval, a program of projects (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 fixed-route service supported with Section 5307 assistance, fares charged seniors, 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: Grantees are required to maintain a drug-free workplace for all grant-related employees and to have an ongoing drug-free awareness program. Grantees receiving Section 5307, 5309, 5311 or 5339 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, deficiencies were found with the FTA requirements for Drug-Free Workplace and Drug and Alcohol Program.

Grantees and their subrecipients, contractors, subcontractors, and lessees are required to have a drug and alcohol testing program for safety-sensitive employees. Grantees are responsible for overseeing the drug and alcohol programs of subrecipients, contractors, subcontractors, and lessees with safety-sensitive employees. The oversight program must ensure that all aspects of the drug and alcohol programs are in compliance with 49 CFR Part 655. CMRTA has an inadequate oversight program to ensure minimal compliance of its contractors and subcontractors. At the site visit, several issues such as outdated policies and incomplete MIS reports were found with the subcontractors' compliance with Part 655. In addition, CMRTA does not obtain any information and/or reports on these programs and their compliance.

Corrective Action and Schedule: By October 6, 2017, submit to the FTA regional office a drug and alcohol oversight plan for its contractors and subcontractors that include updated policies and MIS reporting.

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: Equal Employment Opportunity Commission's regulation only identifies/recognizes religion and not creed as one of the protected groups.)

Finding: During this Triennial Review of CMRTA, deficiencies were found with the FTA requirements for EEO.

For transit management/operations contractors that meet the EEO threshold, the grantee must review the adequacy of their plans. That review should be documented through correspondence with the subrecipient or transit management contractor sufficient to demonstrate that the grantee determined compliance of their plan with FTA C. 4704.1. Although CMRTA is under the EEO threshold, its management/operations contractor, TransDev, is over the threshold with approximately 175 transit-related employees. However, CMRTA has not reviewed the adequacy of TransDev's EEO program.

Corrective Action and Schedule: By October 6, 2017, submit to the FTA RCRO documentation of the process for adequately reviewing EEO plans from transit management contractors that meet threshold requirements.

V. Summary of Findings

Review Area	Finding	Deficiency	Corrective Action	Response Date	Date Closed
1. Financial Management and Capacity	D-142	ECHO documentation deficient	Submit to FTA procedures for documenting how future ECHO draws will be assigned to the correct Financial Purpose Code.	October 6, 2017	June 20, 2017
2. Technical Capacity	D-780	Associated Transit Improvement Report issues	Submit to FTA Associated Transit Improvement Reports for the past year in TrAMS and procedures for submitting the reports with the required information annually.	October 6, 2017	June 20, 2017
	D-208	Inadequate oversight of subrecipient/third-party contractor/lessees	Submit to FTA a comprehensive oversight program for overseeing its operations and maintenance contractor for compliance with Federal requirements. This program must identify performance measures, reconciliation method when performance measures are not meet, and on-going monitoring procedures	October 6, 2017	
3. Maintenance	D-117	Facility/equipment maintenance program lacking or inadequate	Submit to FTA a new or revised facility/equipment maintenance program.	October 6, 2017	June 20, 2017

Review Area	Finding	Deficiency	Corrective Action	Response Date	Date Closed
	D--149	Late facility/equipment preventive maintenance	Submit to FTA: <ul style="list-style-type: none"> • Procedures for completing facility preventive maintenance inspections on time. • A monthly report signed by the chief executive officer or other senior management designee on its facility/equipment preventive maintenance results until the data demonstrates it has conducted at least 80 percent of its facility/equipment preventive maintenance on time for three consecutive months depending on the frequency inspections are identified. For the items reported on, submit a report listing the items, the dates the inspections are due, and the dates of the actual inspections. List the percentage of the inspections performed on time. Direct the grantee to submit to the FTA regional office back-up documentation for each item (e.g., copy of work order, printout from the maintenance management system) documenting the date of the inspection. 	October 6, 2017	
	D-191	Inadequate oversight of contracted maintenance activities	Submit to FTA a vehicle and facility/equipment maintenance oversight program, along with evidence of its implementation such as meetings, reports, inspections, etc.	October 6, 2017	
4. ADA	D-165	Insufficient oversight ADA complementary paratransit	Submit to the FTA Regional Civil Rights Officer (RCRO) procedures for ensuring that the contractors comply with the requirements of 49 CFR 37 Subpart F.	October 6, 2017	

Review Area	Finding	Deficiency	Corrective Action	Response Date	Date Closed
	D-316	Insufficient no-show policy	Submit to the FTA RCRO documentation that is has revised its no-show suspension policy to clearly define when a rider will have established a pattern or practice of missing scheduled trips, and the duration of suspension for each occurrence.	October 6, 2017	
5. Title VI	ND				
6. Procurement	D-340	Lacking independent cost estimate	Submit to FTA documentation that it has updated its procurement process to include development of independent cost estimates prior to receipt of bids or proposals. For the next procurement, submit to the FTA regional office documentation that the required process was implemented.	September 6, 2017	
	D-290	Lacking required justification and documentation for non-competitive award	Submit to FTA evidence of an implemented policy to ensure that future single bid procurements are properly documented.	October 6, 2017	
	D-265	Pre-award and/or post-delivery certifications lacking	Submit to FTA signed post-delivery certifications for the procurement of 8 buses in 2016 and procedures for completing the applicable pre-award and post-delivery audits and certifications for future revenue rolling stock procurements.	August 30, 2017	
7. DBE	D-279	DBE public participation process deficiencies	Submit to the FTA RCRO a timeline for facilitating public participation for its DBE goal setting, including a schedule for consultative meetings and a timeline for issuing a public notice on its website for future cycles.	October 6, 2017	
	D-327	DBE uniform reports not submitted semi-annually or FTA comments not addressed	Submit to the FTA RCRO implemented procedure to ensure that future semi-annual DBE reports are submitted on time and FTA comments are addressed.	October 6, 2017	
	D-778	No proportionate reduction of race-conscious goal	Submit to the FTA RCRO procedures to proportionately reduce the use of race-conscious goals if it is exceeding it goals using race-conscious means.	October 6, 2017	

Review Area	Finding	Deficiency	Corrective Action	Response Date	Date Closed
	D-162	Grantee does not monitor DBE compliance	Submit to the FTA RCRO an updated DBE Program with monitoring procedures that ensure contractors and subrecipients are in compliance with DBE Regulations. Provide evidence of implementation with remedies when noncompliance occurs.	October 6, 2017	
8. Legal	ND				
9. Satisfactory Continuing Control	D-161	Excessive fixed-route bus spare ratio	Submit to FTA a plan for reducing CMRTA's spare ratio to 20 percent. The plan should include a spreadsheet listing, for each bus type, the number of buses, and, for each year until the spare ratio reaches 20 percent, the number of buses to be disposed of, the number of buses to be added, the projected peak requirement, and the projected spare ratio. The plan should include detailed justifications for future years in which spare ratios exceed 20 percent.	October 6, 2017	
10. Planning/POP	ND				
11. Public Comment on Fare Increases and Major Service Reductions	ND				
12. Half Fare	ND				
13. Charter Bus	ND				
14. School Bus	ND				
15. Security	ND				
16. Drug-Free Workplace/ Drug and Alcohol Program	D-157	Drug and Alcohol contractors, subrecipients, and/or lessees not properly monitored for D&A program	Submit to FTA a drug and alcohol oversight plan for its contractors and subcontractors that include updated policies and MIS reporting.	October 6, 2017	
17. EEO	D-31	Failure to adequately review EEO plans	Submit to the FTA RCRO documentation of the process for adequately reviewing EEO plans from transit management contractors that meet threshold requirements.	October 6, 2017	

VI. Attendees

Name	Title/Organization	Phone Number	E-mail Address
CMRTA			
Ann August	Interim Exec. Director	803-255-7132	Ann.august@catchthecomet.org
Missey Lawlor	Admin Coordinator	803-255-7132	Missy.lawlor@catchthecomet.org
Michelle Ransom	Grants and Contracts Manager	803-255-7134	Michelle.ransom@catchthecomet.org
Rosalyn Andrews	Interim Finance Manager	803-255-7135	Rosalyn.andrews@catchthecomet.org
Samuel Scheib	Director of Planning	803-255-7110	Samuel.scheib@catchthecomet.org
Virginia Goodson	Project Implementation Specialist	803-255-7137	Virginia.goodson@catchthecomet.org
LeRoy Deschamps	Director of Administration	803-255-7133	Leroy.deschamps@catchthecomet.org
Ron Anderson	Board Vice Chair	803-254-2300	Ron.anderson@colliers.com
Joyce Dickerson	Board Chair		
Lynn Hutto	HR Consultant	803-206-5215	Lhutto5@me.com
Liz Crum	Attorney Consultant	803-753-3240	lcrum@MCNAIR.net
Leah Moody	Attorney Consultant	803-493-6844	lbmatty@comporium.net
TransDev			
Tanisha Woodson	Human Resources	803-255-7086	Tanisha.woodson@transdev.com
Rosalind Lorick	Asst. Safety Manager	803-255-7108	Rosalind.lorick@transdev.com
Burley Wilkins	General manager	803-255-7082	Burley.wilking@transdev.com
Betty Robinson	Safety Manager	803-255-7084	Betty.robinson@transdev.com
Jason Woznac	Maintenance Manager	803-255-7094	Jason.woznac@transdev.com
Transport Care Services			
Loretta Lewis	Operations Manager	803-255-7090	loretta@transportcareservices.com
FTA			
Dwight Hill	Senior Contracts Consultant	404-865-5641	dwight.hill.CTR@dot.gov
Robert Buckley	Director, Office of Financial Management and Oversight	404-865-5618	robert.buckely@dot.gov
Dee Foster	Regional Civil Rights Officer	404-865-5633	doretha.foster@dot.gov
Layana George	Program Manager	404-865-5638	Layana.george@dot.gov
Micah Miller	Regional Counsel	404-865-5474	micah.miller@dot.gov
Monica McCallum	Director of Regional Operations Division	206-220-7519	monica.mccallum@dot.gov
CDI/DCI Joint Venture			
John Caruolo	Reviewer	610-983-3694	JCaruolo@aol.com

VII. Appendices

No appendices included in this report.