

FINAL REPORT

FY2009 TRIENNIAL REVIEW

of the

**Yuma Metropolitan Planning Organization
(YMPO)
Yuma, Arizona**

Desk Review: January 28, 2009

Site Visit: July 20-21, 2009

August 2009

**Prepared for the
Federal Transit Administration
Region 9
San Francisco, California**

by

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I. TRIENNIAL REVIEW BACKGROUND

The United States Code, chapter 53 of title 49, requires the Federal Transit Administration (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).

- (2) At least once every 3 years, the Secretary shall review and evaluate completely the performance of a recipient in carrying out the recipient's program, specifically referring to compliance with statutory and administrative requirements and the extent to which actual program activities are consistent with the activities proposed under subsection (d) of this section and the planning process required under sections 5303-5306 of this title.
- (3) The Secretary may take appropriate action consistent with the review, audit and evaluation under this subsection, including making an appropriate adjustment in the amount of a grant or withdrawing the grant.

The Triennial Review includes a review of the grantee's compliance in 23 different areas. The basic requirements for each of these areas are summarized below.

This report presents the findings from the Triennial Review of the Yuma Metropolitan Planning Organization (YMPO) of Yuma, Arizona. This review was performed in accordance with FTA procedures (published in FTA Order 9010.1B, April 5, 1993) and included preliminary reviews of documents on file at the Region 9 Office in San Francisco, California and on-site discussions and review of the procedures, practices, and records of the YMPO as deemed necessary. The review concentrated primarily 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. During the visit, administrative and statutory requirements were discussed, documents were reviewed, and facilities were toured. Specific documents examined during the Triennial Review are available in FTA's and the YMPO's files.

II. REVIEW PROCESS

The desk review was conducted in the Region 9 Office on January 28, 2009. Following the desk review, an agenda package was sent to the YMPO advising it of the site visit and indicating additional information that would be needed and issues that would be discussed.

The site visit to the YMPO occurred on July 20-21, 2009. The individuals participating in the review are listed in Section VII of this report.

At the entrance conference, the purpose of the Triennial Review and the review process were discussed. During the site visit, urbanized area formula grant program administrative and

statutory requirements were discussed and documents were reviewed. The YMPO's transit facilities were toured to provide an overview of activities related to FTA-funded projects. A sample of FTA-funded vehicles was inspected during the site visit.

On completion of the review, an exit conference was held with the YMPO staff to discuss findings, corrective actions, and schedules. This information is summarized in the table in Section V of this report. A draft copy of this report was provided to the YMPO at the exit conference.

III. DESCRIPTION OF THE GRANTEE

The Yuma Metropolitan Planning Organization (YMPO) is a transportation policy-making organization consisting of representatives from local governments and transportation authorities, including the City of San Luis, the City of Somerton, the Town of Wellton, the City of Yuma, the Cocopah Indian Tribe, Yuma County, and the Arizona Department of Transportation. YMPO is responsible for coordinating and establishing a comprehensive transportation planning process for Yuma County. YMPO was created in 1982. The neighboring Winterhaven, California was included in the YMPO due to its relatively small urban population. This made YMPO a bi-state metropolitan planning organization.

In 2001, YMPO began providing public transportation to the southern portion of Yuma County, Arizona. The area is bounded on the north by the State of California, on the south and west by Mexico, and the east is more of the state of Arizona. YMPO has a contract with Just for You Transportation, based in Phoenix, Arizona, to operate the fixed route service, Yuma County Area Transit (YCAT). It also contracts with Kay Transportation Services for the ADA complementary paratransit service. YMPO operates seven bus routes. There are 14 buses used for fixed route service. Ten buses are owned by YMPO and four buses are leased. Fixed route service is provided Monday through Saturday from 5:55 a.m. to 10:07 p.m. There is no fixed route service on Sunday. ADA complementary paratransit service is provided Monday through Saturday from 5:00 a.m. to 10:10 p.m. There is no Sunday service. As of July 2008, the population of the service area numbers approximately 194,322 persons.

The basic adult fare is \$1.50. A reduced fare of \$.75 is offered to seniors 60 years or older, persons with disabilities, and Medicare cardholders during all hours of operation. The basic adult fare for ADA is \$3.00.

The Cocopah Indian Tribe contracts with YMPO to provide two routes, the "gray route" and the "purple route" that serve the Cocopah Indian Reservation and connects with the Cocopah Casino. Each route requires one bus to operate from Monday through Saturday. The purple line operates from 6:55 a.m. to 8:41 p.m. and the grey line from 7:00 a.m. to 6:56 p.m. The Cocopah Indian Tribe pays for all operating and maintenance costs for the services. The vehicles assigned to the route are leased buses and were not purchased with FTA funds. The agreement stipulates that members of the Cocopah Indian Tribe can use the service free with the presentation of an ID card issued by the Cocopah Indian Tribe as long as the rider originates and terminates on the purple or gray line. If the tribe member transfers to another line, he/she must pay the full fare as re-

quired by YMPO. Non-Cocopah Indian Tribe members must pay the regular YMPO fares as specified by the YMPO tariff.

YMPO's four-member transportation staff are located in an administrative office at 502 South Orange Avenue. Fixed route and Dial-a-Ride services are operated from a leased private facility.

The YMPO's 2008 National Transit Database Report was not available at the site review because many closeout issues still have not been resolved.

During the last three years YMPO has focused on fleet replacement.

YMPO continues its express rural transit connector route between the City of Yuma and the Town of Wellton, Arizona as a three-year pilot project. The Arizona DOT is providing the match money for the route with LTAF II funds from the state lottery. Because of the recent economic downturn, the \$400,000 provided by the state annually will be discontinued and this action will likely cause the cessation of service to Wellton. YMPO has leased a larger operations and maintenance facility with more outdoor space for parking.

Over the next three years, YMPO will focus on projects in its newly approved ARRA grant that includes replacement buses and vans, smart card technology, installation of security cameras on buses, and public announcement systems on buses. YMPO is working with regional partners to develop and create a new Regional Transit Authority with a dedicated tax base.

IV. RESULTS OF THE REVIEW

The Triennial Review focused on compliance in 23 areas. This section provides a discussion of the basic requirements and findings in each area. No deficiencies were found with the FTA requirements in 18 of the 23 areas. Deficiencies were found in eight areas: Legal, Financial, Technical, Satisfactory Continuing Control, Public Comment, NTD, Drug Free Workplace, and Drug & Alcohol Program.

1. 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 all necessary action and responsibility on behalf of the grantee must be properly delegated and executed.

Findings: During this Triennial Review of the YMPO, deficiencies were found with the FTA requirements for legal.

YMPO submitted its annual certifications and assurances late on May 13, 2009. In addition, the certification and assurances lacked a proper attorney affirmation, which was completed on June 9, 2009.

Corrective Action & Schedule: By August 28, 2009 YMPO needs to resubmit to FTA Region 9 its annual certification and assurances for FY 2009 with an effective date of June 9, 2009, the date of the attorney's affirmation of Linda McFarland as the agent.

YMPO shall include in the preparation of its grant management procedures, details of the process, the timeline and the roles and responsibilities for submitting its annual certification and assurances in its grants management procedures and submit to FTA Region 9 by November 20, 2009.

2. Financial

Basic Requirement: The grantee must demonstrate the ability to match and manage FTA grant funds, cover cost increases, cover operating deficits through long-term stable and reliable sources of revenue, maintain and operate federally funded facilities and equipment, and conduct an annual independent organization-wide audit in accordance with the provisions of OMB Circular A-133.

Findings: During this Triennial Review of the YMPO, deficiencies were found with the FTA requirements for financial.

YMPO does not have completed audits for FY 2006, 2007, and 2008. The A-133 audits for FYs 2006 and 2007 are in draft form. The FY 2008 A-133 draft audit was being completed at the time of the review. FTA guidelines require that A-133 audits be completed no later than nine months after the completion of the fiscal year or later if the grantee receives permission from the FTA. YMPO did not ask for more time to complete the audits.

Corrective Action & Schedule: By November 20, 2009, YMPO will submit to FTA the completed audits for FYs 2006, 2007, and 2008.

3. Technical

Basic Requirement: The grantee must be able to implement the Urbanized Area Formula Grant Program of Projects in accordance with the grant application, Master Agreement, and all applicable laws and regulations, using sound management practices.

Findings: During this Triennial Review of the YMPO, deficiencies were found with the FTA requirements for technical.

A review of the MPRs and FSRs for YMPO's open grants showed that these reports had not been submitted for the last two years. YMPO had elected to submit these reports quarterly.

A review of the MPRs submitted in 2006 and 2007 for the YMPO's grants showed that they do not include complete milestone detail descriptions, milestone progress, milestone completion dates, and Project Status Overviews as required by FTA C 5010.1D.

The lack of current submissions and the inadequacy of prior submissions indicate that YMPO needs to have better grant administration. YMPO lacks grant management procedures. At the time of the review they were in the process of developing them. With a staff of only four for the entire MPO program, it is important that these procedures specify duties and responsibilities assigned to YMPO personnel and include a clear timeline for meeting FTA requirements.

Corrective Action & Schedule: YMPO will complete its grant administrative procedures and ensure that they contain a definition of the process, the assignment of specific duties and responsibilities, and a timeline for meeting the various FTA requirements that support grant administration. A copy of the grant administration procedures will be submitted to FTA Region 9 by November 20, 2009.

YMPO will update its MPRs and FSRs for all its outstanding grants as required by FTA C 5010.1D and submit them to FTA Region 9 by November 20, 2009. Further, it will include in its grants management procedures the process, timeline, and roles and responsibilities for completing the task of updating the MPRs and FSRs and ensuring their reconciliation with FTA records. A copy of these procedures will be submitted to FTA Region 9 by November 20, 2009.

YMPO's MPRs will provide all FTA-required information. This includes: current status of each open ALI; a narrative description of projects, status, any problems encountered in implementation, specification preparation, bid solicitation, resolution of protests, and contract awards; detailed discussion of all budget or schedule changes; the dates of expected or actual requests for bid, delivery, etc.; actual completion dates for completed milestones; revised estimated completion dates when original estimated completion dates are not met; explanation of why scheduled milestones or completion dates were not met; identification of problem areas and narrative on how the problems will be solved; discussion of the expected impacts and the efforts to recover from the delays; analysis of significant project cost variances. These MPRs must be submitted by November 20, 2009.

4. Satisfactory Continuing Control

Basic Requirement: The grantee must maintain control over real property, facilities, and equipment and ensure that they are used in transit service.

Findings: During this Triennial Review of the YMPO, deficiencies were found with the FTA requirements for satisfactory continuing control.

A physical inventory of FTA funded fixed assets was completed in June 2008 but the inventory results were not reconciled with YMPO's fixed asset records. The fixed asset records do not have all FTA-required information.

YMPO has a fleet of 14 fixed route buses. It requires eight buses to meet peak service schedules, leaving six spares available for standby and/or maintenance. This is equivalent to a spare ratio of 75%. While a fleet of fewer than 50 buses does not have to meet the 20 percent guideline for spare ratio, FTA does require that the spare ratio be reasonable.

Corrective Action & Schedule: YMPO needs to develop and implement a fixed asset procedure that defines the process for reviewing, posting, accounting for, and disposing of FTA funded fixed assets. These procedures will describe the process and the roles and responsibilities for implementing the procedures. A copy of the procedures and evidence of their implementation will be sent to FTA Region 9 by November 20, 2009.

By November 20, 2009, YMPO must provide FTA evidence of the reconciliation of the 2008 inventory and updated asset records showing that all FTA-required information is in the files.

By the same date, YMPO will provide FTA Region 9 a justification for its spare ratio of 75 percent or actions taken or to be taken to reduce the spare ratio. Included in the justification will be a fleet replacement forecast that projects spare ratios for fixed route operations over the next three years.

5. Maintenance

Basic Requirement: The grantee must keep federally funded equipment and facilities in good operating order.

Findings: During this Triennial Review of the YMPO, no deficiencies were found with the FTA requirements for maintenance.

6. Procurement

Basic Requirement: FTA grantees will use their own procurement procedures that reflect applicable state and local laws and regulations, provided that the process ensures competitive procurement and that the procedures conform to applicable federal law including 49 CFR Part 18, specifically Section 18.36 and FTA Circular 4220.1F, "Third Party Contracting Requirements." Grantees will maintain a contract administration system that ensures that contractors perform in accordance with terms, conditions, and specifications of their contracts or purchase orders.

Findings: During this Triennial Review of the YMPO, no deficiencies were found with the FTA requirements for procurement.

7. Disadvantaged Business Enterprise (DBE)

Basic Requirement: The grantee must comply with the policy of DOT that DBEs, as defined in 49 CFR Part 26, are ensured 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; ensure that only firms that fully meet eligibility standards are permitted to participate as DBEs; help remove barriers to the participation of DBEs; and assist the development of firms that can compete successfully in the marketplace outside the DBE program.

Findings: During this Triennial Review of the YMPO, no deficiencies were found with the FTA requirements for DBE.

8. Buy America

Basic Requirement: Per FTA's "Buy America" requirements, federal funds may not be obligated unless steel, iron, and manufactured products used in FTA funded projects are produced in the United States, unless FTA has granted a waiver, or the product is subject to a general waiver. Rolling stock must have sixty percent domestic content and final assembly must take place in the United States.

Findings: During this Triennial Review of the YMPO, no deficiencies were found with the FTA requirements for Buy America.

9. Suspension/Debarment

Basic Requirement: To protect the public interest and prevent fraud, waste, and abuse in federal transactions, persons or entities, which by defined events or behavior, potentially threaten the integrity of federally administered programs, are excluded from participating in FTA assisted programs. Federal agencies use the government-wide nonprocurement debarment and suspension system to exclude from Federal programs persons who are not presently responsible. Grantees are required to ensure to the best of their knowledge and belief that none of the grantee's "principals" (as defined in the governing regulation 2 CFR Part 180), subrecipients, and third-party contractors and subcontractors is debarred, suspended, ineligible, or voluntarily excluded from participation in federally assisted transactions or procurements. Grantees are strongly encouraged to review the Excluded Parties Listing System (<http://www.epls.gov/>) before entering into any third party contracts.

Findings: During this Triennial Review of the YMPO, no deficiencies were found with the FTA requirements for suspension/debarment.

10. Lobbying

Basic Requirement: Recipients of federal grants and contracts exceeding \$100,000 must certify compliance with Restrictions on Lobbying before they can receive funds. In addition, grantees are required to impose the lobbying restriction provisions on their contractors.

Findings: During this Triennial Review of the YMPO, no deficiencies were found with the FTA requirements for lobbying.

11. Planning/Program of Projects

Basic Requirement: The grantee must participate in the transportation planning process in accordance with FTA requirements, SAFETEA-LU, and the Metropolitan and Statewide Planning Regulations.

Each recipient of a grant shall have complied with the public participation requirements of Section 5307(c)(1) through (7). Each recipient is required to develop, publish, afford an opportunity for a public hearing on, and submit for approval a Program of Projects (POP).

Findings: During this Triennial Review of the YMPO, no deficiencies were found with the FTA requirements for planning/POP.

12. Title VI

Basic Requirement: The grantee must ensure that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participating in, or denied the benefits of, or be subject to discrimination under any program, or activity receiving federal financial assistance. The grantee must ensure that federally supported transit services and related benefits are distributed in an equitable manner.

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

13. Public Comment Process for Fare Increases and Service Reductions

Basic Requirement: The grantee is expected to have a written copy of a locally developed process to solicit and consider public comment before raising a fare or carrying out a major reduction of transportation services.

Findings: During this Triennial Review of the YMPO, deficiencies were found with the FTA requirements for public comment process for fare increases and service reductions.

YMPO did not have written procedures for the solicitation of public comment prior to raising fares or carrying out major service reductions. As required by the FTA, such procedures need to define a major service reduction.

YMPO raised fares during the last three years. It did not have a record of how it solicited or reviewed public comments and provide the material gathered for decision by the governing Board of the YMPO.

Corrective Action & Schedule: YMPO will prepare written procedures for the solicitation of public comment for raising fares and reducing service. The procedures will include a description of what a major service reduction is and how the public comment will be presented to the governing board of YMPO as they deliberate their decision. The written procedures will be submitted to FTA Region 9 by November 20, 2009.

14. Half Fare

Basic Requirement: Grantees must ensure that elderly persons and persons with disabilities, or an individual presenting a Medicare card will be charged, during non-peak hours for transportation using or involving a facility or equipment of a project financed under Section 5307, not more than 50 percent of the peak hour fare.

Findings: During this Triennial Review of the YMPO, no deficiencies were found with the FTA requirements for half fare.

15. ADA

Basic Requirement: Titles II and III of the Americans with Disabilities Act 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.

Findings: During this Triennial Review of the YMPO, no deficiencies were found with the FTA requirements for ADA.

16. Charter Bus

Basic Requirement: FTA 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.

The grantees are allowed to operate community based charter services exempted under the regulations; some irregular or limited duration services; and those that are covered by the exceptions.

Findings: During this Triennial Review of the YMPO, no deficiencies were found with the FTA requirements for charter bus.

17. School Bus

Basic Requirement: FTA grantees are prohibited from providing exclusive school bus service unless it qualifies under specified exceptions. In no case can federally funded equipment or facilities be used.

Findings: During this Triennial Review of the YMPO, no deficiencies were found with the FTA requirements for school bus.

18. National Transit Database (NTD)

Basic Requirement: Grantees that receive 5307 and 5311 grant funds must collect, record, and report financial and non-financial data in accordance with the Uniform System of Accounts (USOA) and updated with the National Transit Database (NTD) Reporting Manual as required by 49 USC 5335(a).

Findings: During this Triennial Review of the YMPO, deficiencies were found with the FTA requirements for National Transit Database.

YMPO has made untimely submission of its annual NTD reports for the period. YMPO has also been untimely on several occasions in its response to NTD's request for corrective actions to the 2008 annual submission. It has received a Failure to Report Warning Letter from FTA on the 2008 submissions. Because YMPO is in communication directly with FTA and its contractors on these NTD issues, no corrective actions are being made relative to the continuing issues related to the 2008 submission. However, YMPO does not have procedures in place to manage effectively the NTD submission process.

Corrective Actions & Schedule: YMPO will include in its grants management procedures a description of the process of preparing, submitting, and responding to NTD staff for the annual NTD reports. The written procedures will also describe the assignment of the duties and responsibilities to YMPO staff to accomplish the process and a timeline for accomplishing it on an annual basis. These will be submitted to FTA Region 9 by November 20, 2009 along with a statement that the procedures have been implemented.

19. Safety and Security

Basic Requirement: Any recipient of Urbanized Area Formula Grant Program funds must annually certify that it is spending at least one percent of such funds for transit security projects or that such expenditures for security systems are not necessary.

Under the safety authority provisions of the Federal transit laws, the Secretary has the authority to investigate the operations of the grantee for any conditions that appear to create a serious hazard of death or injury, especially to patrons of the transit service. States are required to oversee the safety of rail fixed guideway systems through a designated oversight agency, per 49 CFR Part 659, Rail Fixed Guideway Systems, State Safety Oversight.

Under security, a list of 17 Security and Emergency Management Action Items has been developed by FTA and the Department of Homeland Security's Transportation Security Administration (TSA). This list of 17 items, an update to the original FTA Top 20 security action items list, was developed in consultation with the public transportation industry through the Mass Transit Sector Coordinating Council, for which the American Public Transportation Association (APTA) serves as Executive Chair. Security and Emergency Management Action Items for Transit Agencies aim to elevate security readiness throughout the public transportation industry by establishing baseline measures that transit agencies should employ.

The goal of FTA's Safety and Security Program is to achieve the highest practical level of safety and security in all modes of transit. To this end, FTA continuously promotes the awareness of safety and security throughout the transit community by establishing programs to collect and disseminate information on safety/security concepts and practices. In addition, FTA develops guidelines that transit systems can apply in the design of their procedures and by which to compare local actions. As such, many of the questions in this review area are designed to determine what efforts grantees have made to develop and implement safety, security, and emergency management plans. While there may not be specific requirements associated with all of the questions, grantees are encouraged to implement the plans, procedures, and programs referenced in these questions. For this reason, findings in this area will most often result in advisory comments rather than deficiencies.

Findings: A summary of the YMPO's expenditures of Section 5307 funds for security projects is provided in Section VI of this report.

During this Triennial Review of the YMPO, no deficiencies were found with the FTA requirements for safety and security.

20. Drug-Free Workplace

Basic Requirement: FTA grantees are required to maintain a drug-free workplace for all employees and to have an ongoing drug-free awareness program.

Findings: During this Triennial Review of the YMPO, deficiencies were found with the FTA requirements for drug-free workplace.

YMPO does not have a Drug-Free Workplace policy as required by 49 CFR Part 32.

Corrective Action & Schedule: YMPO will develop and adopt Drug-Free Workplace Policy and provide a copy to FTA Region 9 and evidence of its implementation by November 20, 2009.

21. Drug and Alcohol Program

Basic Requirement: Grantees receiving FTA funds under Capital Grant (Section 5309), Urbanized Area Formula Grant (Section 5307), or Non-Urbanized Area Formula Grant (Section 5311) Programs must have a drug and alcohol testing program in place for all safety-sensitive employees.

Findings: During this Triennial Review of the YMPO, deficiencies were found with the FTA requirements for drug and alcohol.

YMPO's third part contractors for providing fixed route and ADA complementary operations and maintenance services have Drug and Alcohol Programs but they follow the requirements of FHWA and not the FTA.

Corrective Action & Schedule: YMPO must require Just for You Transportation to develop an FTA Drug and Alcohol Policy that meets the requirements of 49 CFR Part 655 and 49 CFR Part 40 and submit the policy to FTA by October 20, 2009. The policy must be adopted by the private operators' governing boards. Further, the policy will be distributed to all of the contractor's employees in Yuma with evidence of their acknowledgement of receipt of the policy prior to submission to YMPO and FTA.

22. Equal Employment Opportunity (EEO)

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 physical or mental 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 from the federal transit laws.

Findings: During this Triennial Review of the YMPO, no deficiencies were found with the FTA requirements for EEO.

23. ITS Architecture

Basic Requirement: Intelligent Transportation Systems (ITS) projects funded by the Highway Trust Fund and the Mass Transit Account must conform to the National ITS Architecture, as well as to United States Department of Transportation (USDOT) adopted ITS Standards.

Findings: During this Triennial Review of the YMPO, no deficiencies were found with the FTA requirements for ITS architecture.

V. SUMMARY OF FINDINGS AND CORRECTIVE ACTIONS

Review Area	Finding	Deficiency	Corrective Action	Response Days/Date	Date Closed
1. Legal	D-05	Improperly completed annual list of Certifications and Assurances	Resubmit FY 2009 certification	November 20, 2009	
	D-06	No/late submission	Provide updated procedures for future submissions	November 20, 2009	
2. Financial	D-15	Single audit submissions deficient	Submit completed A-133 audits for FYs 2006, 2007, and 2008	November 20, 2009	
3. Technical	D-01	Inadequate grant administration procedures	Develop and submit to FTA written grant management procedures	November 20, 2009	
	D-03	Progress reports lack required information	Provide all FTA-required information. Update MPRs and FSRs for all outstanding grants	November 20, 2009	
4. Satisfactory Continuing Control	D-03	Inadequate Equipment records	Provide FTA asset records that contain all FTA required information	November 20, 2009	
	D-05	Inventory results not reconciled to equipment records	Provide FTA evidence of inventory reconciliation	November 20, 2009	
	D-08	Excessive spare ratio	Provide FTA justification for spare ratio and plans for future fleet replacement and spare ratio	November 20, 2009	
5. Maintenance	ND				
6. Procurement	ND				
7. Disadvantaged Business Enterprise	ND				
8. Buy America	ND				
9. Suspension/Debarment	ND				
10. Lobbying	ND				
11. Planning/POP	ND				
12. Title VI	ND				

Review Area	Finding	Deficiency	Corrective Action	Response Days/Date	Date Closed
13. Public Comment for Fare Increases and Service Reductions	D-01	Local process not evident	Develop, implement and submit to FTA written procedures soliciting public comment prior to a fare increase or major service reductions. Define major service reductions.	November 20, 2009	
14. Half Fare	ND				
15. ADA	ND				
16. Charter Bus	ND				
17. School Bus	ND				
18. National Transit Database	D-01	Annual NTD report submission not timely	Develop, implement and submit to FTA written procedures for administering the NTD data collection and reporting requirements	November 20, 2009	
	D-02	Inadequate response to NTD follow-up			
19. Safety and Security	ND				
20. Drug-Free Workplace	D-02	No written policy	Develop and implement a drug-free workplace policy	November 20, 2009	
21. Drug and Alcohol Program	D-02	Drug & Alcohol Policy lacking required elements	Require Just for You Transportation to develop a FTA Drug and Alcohol Policy that meets the requirements of 49 CFR Part 655 and 49 CFR Part 40 and submit the policy to FTA. The policy must be adopted by the private operator's governing board. Further, the policy will be distributed to all of the contractor's employees in Yuma with evidence of their acknowledgement of receipt of the policy prior to submission to YMPO and FTA.	October 20, 2009	
22. Equal Employment Opportunity	ND				
23. ITS Architecture	ND				

Findings: ND = No Deficiencies; D = Deficient; AC = Advisory Comment; NA = Not Applicable; NR = Not Reviewed

VI. TRANSIT SECURITY EXPENDITURES

Does the grantee expend one percent or more of its Section 5307 Urbanized Area Formula Grant funds for transit security? FY2006: Yes___ No___**X**

FY2007: Yes___ No___**X**

FY2008: Yes___ No___**X**

If no, why does the grantee consider such expenditure unnecessary (check all that apply):

___ No deficiency found from a threat and vulnerability assessment

___ TSA/FTA Security and Emergency Management Action Items met or exceeded

X Other (sufficient funds are provided from local sources): .

Security Funding	FTA Section 5307 Funds (in Dollars)		
	FY 2006	FY 2007	FY 2008
Total amount of 5307 Funds expended	\$981,324	\$1,931,612	\$659,804
Amount of 5307 Funds expended on security	\$0	\$0	\$0
Percent of 5307 Funds expended on security	%	%	%
Infrastructure/Capital Improvement Security Projects:			
Lighting, Fencing & Perimeter Control			
CCTV and Surveillance Technology			
Communications Systems			
Security Planning ^(a)			
Drills & Tabletop Exercises ^(a)			
Employee Security Training ^(a)			
Other Security-Related Infrastructure & Capital Improvements (please list): _____			
Operating/Personnel Expenditures (can only be used by agencies in areas with populations UNDER 200,000):			
Contracted Security Force			
In-house Security Force			
Other Security-Related Operating Expenditures (please list): _____			

^(a) SAFETEA-LU amended the definition of a capital project to include:

- projects to refine and develop security and emergency response plans;
- the conduct of emergency response drills with public transportation agencies and local first response agencies; and security training for public transportation employees.

VII. ATTENDEES

Name	Title/Organization	Phone Number	e-mail address
YMPO			
F. Luckie	Executive Director	928-783-8911	fluckie@ympo.org
Linda McFarland	Administrative Assistant	928-783-8911	lmcfarland@ympo.org
Edd McDaniel	Contract Administrator	928-783-8911	emcdaniel@ympo.org
Yuma Transit, LLC			
Willie E. Gray	President	928-783-2235	willieg@yumatransit.com
Carl E. Jordan	General Manager	928539-7076	carlj@kaytransportation.com
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