



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

REGION IX
Arizona, California,
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American Samoa,
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JUN 27 2012

Ms. Charlene FitzGerald
Executive Director
Yuma Metropolitan Planning Organization
502 S. Orange Ave
Yuma, AZ 85364

Re: FTA FY 2012 Triennial Review

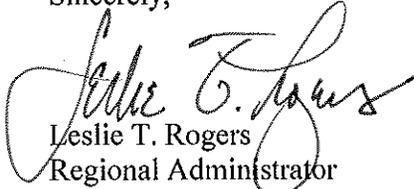

Dear Ms. FitzGerald:

Enclosed is a copy of the final report of the Federal Transit Administration's (FTA) Triennial Review of the Yuma Metropolitan Planning Organization (YMPO) and its transit system as required by 49 USC 5307 (i). Although less exacting than an audit, the Triennial Review is the FTA's assessment of the YMPO's compliance with federal requirements determined by the examination of grant management practices and program implementation.

The Triennial Review examines 24 areas. Deficiencies were found in the following four areas: Procurement, Disadvantaged Business Enterprise, ADA, and ARRA. The Procurement area findings were related to ARRA grants. There were no repeat findings from the last review. In response to the draft report, the City submitted information that enabled us to close all of the findings.

Please convey our appreciation to your staff for the assistance and cooperation they provided to the FTA review team. If you have any questions or comments, please contact Audrey Bredehoff of my staff at audrey.bredehoff@dot.gov or 415-744-2597.

Sincerely,


Leslie T. Rogers
Regional Administrator

Enclosure

FINAL REPORT

FY2012 TRIENNIAL REVIEW

of the

**Yuma Metropolitan Planning Organization
(YMPO)**

Yuma, Arizona

Recipient ID: 5109

**Desk Review: January 4, 2012
Site Visit: June 11 and 12, 2012**

June 2012

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

by

**John R. Caruolo, P.E.
CDI/DCI Joint Venture**

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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).

1. At least once every three 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.
2. 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 24 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) in 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 IX Office in San Francisco and on-site discussions and review of the procedures, practices, and records of 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 site 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 YMPO's files.

II. REVIEW PROCESS

The desk review was conducted in the FTA Region IX Office on January 4, 2012. Following the desk review, a review package was sent to 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 YMPO occurred on June 11 and 12, 2012. 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, administrative and statutory requirements were

discussed and documents were reviewed. A sample of maintenance records for FTA-funded vehicles and equipment was examined during the site visit.

Upon completion of the review, an exit conference was held with 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 YMPO at the exit conference.

III. DESCRIPTION OF YMPO

The Yuma Metropolitan Planning Organization 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. Created in 1982, YMPO is responsible for coordinating and establishing a comprehensive transportation planning process for Yuma County. 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 funding public transportation to the southern portion of Yuma County, Arizona, which is in the southwest corner of the state. The name of the transit system was adopted in 2002 as YCAT or the Yuma County Area Transit. The service area is bounded on the north by the State of California and on the south and west by Mexico. The population of the service area is approximately 195,751 persons.

The Yuma County Intergovernmental Public Transportation Authority (YCIPTA) was formed on December 13, 2010 by the Yuma County Board of Supervisors to administer, plan, operate and maintain public transit services throughout Yuma County, including within the political jurisdictional boundaries of the Cities of Yuma, San Luis, Somerton, Town of Wellton, and the unincorporated Yuma County areas.

YCIPTA manages the Yuma County Area Transit (YCAT) and Greater Yuma Area Dial-A-Ride transit system under contract to YMPO. Currently, YMPO is the designated recipient of FTA funds. Starting July 1, 2012, YCIPTA will be a grantee of the FTA as well as the operator of YCAT public transit services in Yuma County. At that time, YCIPTA will assume responsibility of the open FTA grants.

YCIPTA operates ten bus routes. There are eleven FTA-funded vehicles used for this service. Fixed route service is provided Monday through Friday from 5:50 a.m. to 11:10 p.m. On Saturdays, bus service is provided from 9:15 a.m. to 6:30 p.m. There is no service on Sunday. Bus service is oriented around the Yuma Palms Regional Center on a pulse system. Since 2010, First Transit, Inc. has been contracted to provide operating and maintenance services.

ADA complementary paratransit service is provided during the same days and hours as the fixed route service. There are five FTA-funded vehicles that provide this demand responsive service.

The Cocopah Indian Tribe receives FTA Section 5311 (c) funding to support the Purple Route 6 and the Violet Route 7. YMPO invoices the Cocopah Indian Tribe for the service hours provided on these two routes to recover the associated fully allocated operating cost.

The basic YCAT fare is \$2.00. A reduced fare of \$1.00 is offered to seniors 65 years or older, students 5 to 18 years old, persons with disabilities, and Medicare cardholders during all hours of operation. The basic fare for the ADA service is \$4.00.

YMPO’s transportation staff are located in an administrative office at 502 South Orange Avenue in Yuma. YCAT’s fixed route and ADA paratransit services are operated out of the YCAT Bus Facility at 2715 East 14th Street in Yuma. FTA participates in the lease agreement for this First Transit private facility via operating assistance. The only FTA-funded equipment other than vehicles is numerous bus shelters located throughout the YCAT service area.

Yuma’s National Transit Database Report for FY2010 provided the following financial and operating statistics for its fixed-route and demand response service:

	Fixed-Route Service	Demand Responsive Service
Unlinked Passengers	334,536	30,375
Revenue Hours	36,159	23,697
Operating Expenses	\$1,439,004	\$354,432

During the last three years YMPO has completed the following projects:

- Purchased new buses
- Purchased new bus shelters
- Transitioned operations to a new transit operations contractor
- Formed intergovernmental public transportation authority (YCIPTA)
- Completed Yuma Regional Transit Study
- Developed Marketing Plan, including new website
- Restructured transit system
- Hired dedicated transit staff.

Over the next three to five years, YCIPTA plans to implement:

- Fiscal sustainability
- New shuttle routes in San Luis, Quechan/Fort Yuma Reservation, and Fortuna Foothills
- Purchase additional bus shelters and next bus technology
- Renovate a hotel for a multimodal transit center
- Purchase facility for bus maintenance facility
- Develop a five year transit implementation plan
- Implement a countywide transit sales tax.

ARRA Projects:

YMPO's ARRA grant (AZ-96-X004) was awarded on August 27, 2009 and amended on March 9, 2010 for a total of \$2,429,787. This grant funded the purchase of eight buses, eight vans, and 28 new bus shelters. The grant also funded a new smart card fare collection, communication and security systems for its vehicles. All of these projects were completed and this grant is closed.

IV. RESULTS OF THE REVIEW

The Triennial Review focused on YMPO's compliance in 24 areas. This section provides a discussion of the basic requirements and findings in each area. Deficiencies were found in the following four areas: Procurement, Disadvantaged Business Enterprise, ADA, and ARRA. There were no repeat findings from the last review. The Procurement area findings were related to ARRA grants. In response to the draft report, YMPO submitted documentation to close all of the deficiencies.

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 actions and responsibility on behalf of the grantee must be properly delegated and executed.

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

2. Financial

Basic Requirement: The grantee must demonstrate the ability to match and manage FTA grant funds, cover cost increases and operating deficits, financially maintain and operate FTA funded facilities and equipment, and conduct and respond to applicable audits.

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

3. Technical

Basic Requirement: The grantee must be able to implement the 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 YMPO, no deficiencies were found with the FTA requirements for Technical.

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.

Finding: During this Triennial Review of YMPO, no deficiencies were found with the FTA requirements for Satisfactory Continuing Control.

5. Maintenance

Basic Requirement: Grantees and their subrecipients must keep federally funded equipment and facilities in good operating order and maintain ADA accessibility features.

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

6. Procurement

Basic Requirement: FTA 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 YMPO, deficiencies were found with the FTA requirements for Procurement.

Since the last review, YMPO procured and installed bus shelters in two separate ARRA-funded procurement actions. However, neither contract included FTA clauses. Only simple purchase orders were executed in both cases.

A review of YMPO procurements found that neither independent cost estimates nor cost/price analyses are being completed.

In response to the draft report, the YMPO submitted revised procurement procedures that address inclusion of all FTA required third party contract clauses, independent cost estimates prior to receipt of bids or proposals, and performance of cost and price analysis for every procurement action including contract modifications. Therefore, this finding is closed.

7. Disadvantaged Business Enterprise (DBE)

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 YMPO, deficiencies were found with USDOT requirements for DBE.

In FY2011, YMPO had a three percent DBE goal for contracting opportunities. The awards and commitments shown on its Uniform Report of Awards or Commitments and Payments at the end of FY 2011 are less than this overall goal. However, YMPO has not analyzed in detail the reasons for the difference between its overall DBE goal and the DBE awards and commitments.

In response to the draft report, the YMPO submitted the reasons for the difference between its overall DBE goal and the DBE awards and commitments for FY2011 and established steps to correct the problems identified so that the current year goal will be attained. Therefore, this finding is closed.

8. Buy America

Basic Requirement: Federal funds may not be obligated unless steel, iron, and manufactured products used in FTA funded projects are produced in the United States. Grantees must conduct pre-award and post-delivery audits of purchases of revenue rolling stock in order to verify that Buy America provisions, Federal Motor Vehicle Safety Standards, and purchaser's requirements are met.

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

9. Debarment and Suspension

Basic Requirement: Debarment and suspension are tools used to protect the public from fraud, waste, and abuse in federal transactions. Grantees and subgrantees must not make any award or permit any award (subgrant or contract) at any tier to any party that is debarred or suspended or is otherwise excluded from or ineligible for participation in federal assistance programs

Finding: During this Triennial Review of YMPO, no deficiencies were found with the FTA requirements for Debarment and Suspension.

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.

Finding: During this Triennial Review of 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.

Grantees must develop and/or participate in a locally developed, coordinated public transit-human services transportation plan 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 have complied with the public participation requirements of Section 5307(c)(1) through (7). Each grantee is required to 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 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, be 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.

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

13. Public Comment on Fare and Service Changes

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 YMPO, no deficiencies were found with the FTA requirements for Public Comment on Fare and Service Changes.

14. Half Fare

Basic Requirement: During non-peak hours for fixed route service supported with Section 5307 assistance, fares charged elderly persons, persons with disabilities or an individual presenting a Medicare card will not be more than half the peak hour fare.

Finding: During this Triennial Review of 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.

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

The description of the ADA complementary paratransit service says that all reservations must be made 24 hour in advance. YCAT indicated at the site visit that next day service is provided. However, the website and public information materials refer to a 24 hour requirement.

In response to the draft report, the YMPO submitted documentation that it has modified its public information to state that reservations for the ADA complementary service can be taken for next day service (during normal business hours on any day preceding a service day), not 24 hours in advance. Therefore, this finding is closed.

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. Grantees are allowed to operate community based charter services excepted under the regulations.

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

17. 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 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 the *National Transit Database (NTD) Reporting Manual* as required by 49 USC 5335(a).

Finding: During this Triennial Review of YMPO, no deficiencies were found with the FTA requirements for National Transit Database.

19. Safety and Security

Basic Requirement: 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.

As recipients of Urbanized Area Formula Grant Program 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.

FTA and the Department of Homeland Security's (DHS) Transportation Security Administration (TSA) have developed a list of 17 Security and Emergency Management Action Items for Transit Agencies. The action items 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. 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.

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

During this Triennial Review of 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.

Finding: During this Triennial Review of YMPO, no deficiencies were found with the FTA requirements for Drug-free Workplace.

21. Drug and Alcohol Program

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

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

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 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 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 adopted ITS Standards.

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

24. American Recovery and Reinvestment Act (ARRA)

Basic Requirement: Grantees must have the legal, financial and technical capacity to carry out the proposed program of projects and meet the additional reporting requirements for its ARRA-funded grant activities.

Finding: YMPO's ARRA grant (AZ-96-X004) was awarded on August 27, 2009 and amended on March 9, 2010 for a total of \$2,429,787. This grant funded the purchase of eight buses, eight vans, and 28 new bus shelters, The grant also funded a new smart card fare collection, communication and security systems for its vehicles. All of these projects were completed and this grant is closed.

During this Triennial Review of YMPO, deficiencies were found with the FTA requirements for ARRA. See Procurement review area.

In response to the draft report, the YMPO submitted revised procurement procedures that address inclusion of all FTA required third party contract clauses, independent cost estimates prior to receipt of bids or proposals and performance of cost and price analysis for every procurement action including contract modifications. Therefore, this finding is closed.

SUMMARY OF FINDINGS AND CORRECTIVE ACTIONS

Review Area	Finding	Deficiency	Corrective Action	Response Date	Date Closed
1. Legal	ND				
2. Financial	ND				
3. Technical	ND				
4. Satisfactory Continuing Control	ND				
5. Maintenance	ND				
6. Procurement	D-13	No FTA clauses	Submit to the FTA Region IX Office revised procurement procedures that address inclusion of all FTA required third party contract	October 12, 2012	June 19, 2012
	D-17	Lacking required cost/price analysis	Submit to the FTA Region IX Office documentation that it has updated its procurement process to include development of independent cost estimates prior to receipt of bids or proposals.	October 12, 2012	June 19, 2012
	D-34	Lacking independent cost estimate	Submit to the FTA Region IX Office documentation that the procurement process has been updated to include performance of cost and price analysis for every procurement action including contract modifications	October 12, 2012	June 19, 2012
7. Disadvantaged Business Enterprise	D-23	Goal achievement analysis not completed or not submitted	Submit to the FTA Region IX Civil Rights Officer an analysis of the reasons for the difference between its overall DBE goal and the DBE awards and commitments for FY2011 and steps to correct problems identified	October 12, 2012	June 19, 2012
8. Buy America	ND				
9. Debarment and Suspension	ND				
10. Lobbying	ND				
11. Planning/POP	ND				
12. Title VI	ND				
13. Public Comment on Fare and Service Changes	ND				
14. Half Fare	ND				
15. ADA	D-04	ADA Complimentary Paratransit service deficiencies	Submit to the FTA Region IX Civil Rights Officer documentation that it has modified its public information to state that reservations for the ADA complimentary service can be taken for next day service, not 24 hours in advance.	July 12, 2012	June 19, 2012
16. Charter Bus	ND				

Review Area	Finding	Deficiency	Corrective Action	Response Date	Date Closed
17. School Bus	ND				
18. National Transit Database	ND				
19. Safety and Security	ND				
20. Drug-Free Workplace	ND				
21. Drug and Alcohol Program	ND				
22. Equal Employment Opportunity	ND				
23. ITS Architecture	ND				
24. ARRA	D-99	Other	See Procurement review area.	October 12, 2012	June 19, 2012

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

V. TRANSIT SECURITY EXPENDITURES

Does the grantee expend one percent or more of its Section 5307 Urbanized Area Formula Grant funds for transit security?

FY2009:	Yes:		No:	X
FY2010:	Yes:		No:	X
FY2011:	Yes:		No:	X

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

X	No deficiency found from a threat and vulnerability assessment (Done in 2011)
	TSA/FTA Security and Emergency Management Action Items met or exceeded
	Other (please describe):

Security Funding	FTA Section 5307 Funds		
	FY 2009	FY 2010	FY 2011
Total amount of 5307 funds expended	\$1,690,415	\$2,333,987	\$1,846,643
Amount of 5307 funds expended on security	\$4,925	\$43,723	\$1,593
Percent of 5307 funds expended on security	.003 %	.02%	.0008%
Infrastructure/Capital Improvement Security Projects:			
Lighting, fencing & perimeter control	\$4,925	\$1,489	
CCTV and surveillance technology		\$42,239	\$1,593
Communications systems			
Security planning			
Drills & tabletop exercises			
Employee security training			
Other security-related infrastructure & capital improvements (Fall Arrest System)			
Operating/Personnel Expenditures (for agencies in areas with populations under 200,000):			
Contracted security force			
In-house security force			
Other security-related operating expenditures (please list)			

VI. ATTENDEES

Name	Title/Organization	Phone Number	E-mail Address
<i>YMPO</i>			
Charlene Fitzgerald	Executive Director	928-783-8911	cfitzgerald@ympo.org
Shelly Kreger	Accountant II	928-783-8911	skreger@ympo.org
<i>Yuma County Public Transportation Authority</i>			
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<i>First Transit</i>			
Don Kilner	General Manager	928-539-7076	don.kilner@firstgroup.com
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<i>FTA</i>			
Audrey Bredehoft (via phone)	Transportation Program Manager	415-744-2597	Audrey.bredefoft@dot.gov
<i>CDI/DCI Joint Venture</i>			
John Caruolo	Reviewer	610-983-3694	JCaruolo@aol.com