



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

Federal Transit Administration
Region VI

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June 18, 2026

Todd Little
Executive Director
North Central Texas Council of Governments
616 Six Flags Drive
Arlington, TX

Re: Fiscal Year 2026 Triennial Review– Final Report

Dear Mr. Little:

I am pleased to provide you with a copy of this Federal Transit Administration (FTA) Final report which documents the results of FTA's Fiscal Year (FY) 2026 Triennial Review of the North Central Texas Council of Governments (NCTCOG) in Arlington, Texas. Although not an audit, this Triennial Review is FTA's review and evaluation of NCTCOG's compliance with Federal requirements, determined by examining award management and program implementation practices. As such, this review is not a comprehensive and final review of compliance with program funding requirements. The Federal Transit Administration may engage in further compliance reviews, audits, or evaluations appropriate to determine the recipient's compliance with federal law and the terms and conditions of its funding agreements.

The Triennial Review focused on the NCTCOG's compliance in up to 21 areas. No deficiencies were found with FTA requirements in any of these areas.

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 Mr. Zille Khan, Project Manager, at 817-978-0563 or by email at zille.khan@ad.dot.gov.

Sincerely,

Gail Lyssy
Regional Administrator

Enclosure

FINAL REPORT

FISCAL YEAR 2026 TRIENNIAL REVIEW

of

**Gulf Coast Transit District
Texas City, Texas
Recipient ID: 7394**

Performed for:

**U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION
REGION 6**

Prepared By:
RLS & Associates, Inc.

**Desk Review Dates: March 1 – March 24, 2026
Scoping Meeting Date: March 25, 2026
Site Visit Entrance Conference Date: June 1, 2026
Virtual Exit Conference Date: June 9, 2026
Final Report Date: June 18, 2026**

Table of Contents

I. Executive Summary	1
1. Metric.....	1
2. Summary of Findings.....	1
II. Review Background and Process	4
1. Review Background.....	4
2. Process	4
III. Recipient Description	6
1. Organization.....	6
2. Award and Project Activity	7
IV. Results of the Review.....	14
1. Legal	14
2. Financial Management and Capacity.....	14
3. Technical Capacity – Award Management.....	14
4. Technical Capacity – Program Management & Subrecipient Oversight.....	14
5. Technical Capacity – Project Management	15
6. Transit Asset Management	15
7. Satisfactory Continuing Control	15
8. Maintenance.....	15
9. Procurement	15
10. [Reserved]	16
11. Title VI.....	16
12. Americans with Disabilities Act (ADA) – General	16
13. ADA – Complementary Paratransit.....	16
14. [Reserved]	16
15. School Bus	16
16. Charter Bus	17
17. Drug-Free Workplace Act.....	17
18. Drug and Alcohol Program.....	17
19. Section 5307 Program Requirements.....	17
20. Section 5310 Program Requirements.....	18
21. Section 5311 Program Requirements.....	18
22. Public Transportation Agency Safety Plan	18
23. Cybersecurity	18
V. Attendees	19
VI. Appendices	22
Governing Directives	Error! Bookmark not defined.

I. Executive Summary

This report documents the Federal Transit Administration's (FTA) Triennial Review of the North Central Texas Council of Governments (NCTCOG) of Arlington, Texas. FTA wants to ensure that awards are administered in accordance with the requirements of Federal public transportation law 49 U.S.C. Chapter 53. The review was performed by RLS & Associates, Inc. During the site visit, the reviewers discussed the administrative and statutory requirements and reviewed recipient documents.

1. Metric

The metrics used to evaluate whether a recipient is meeting the requirements for each of the areas reviewed are:

- Not Deficient (ND): An area is considered not deficient if, during the review, nothing came to light that would indicate the requirements within the area reviewed were not met.
- Deficient (D): An area is considered deficient if any of the requirements within the area reviewed were not met.
- Not Applicable (NA): An area can be deemed not applicable if, after an initial assessment, the recipient does not conduct activities for which the requirements of the respective area would be applicable.

2. Summary of Findings

The FY 2026 Triennial Review focused on the NCTCOG's compliance in up to 21 areas. Deficiencies related to the COVID-19 Relief funds have been clearly identified as part of the deficiency description in the respective review area.

No deficiencies were found with any of the FTA requirements in any of these areas.

Review Area	Finding	Deficiency Code(s)		Corrective Action(s)	Response Due Date(s)	Date Closed
		Code	Description			
1. Legal	ND					
2. Financial Management and Capacity	ND					
3. Technical Capacity – Award Management	ND					

Review Area	Finding	Deficiency Code(s)		Corrective Action(s)	Response Due Date(s)	Date Closed
		Code	Description			
4. Technical Capacity – Program Management and Subrecipient Oversight	ND					
5. Technical Capacity – Project Management	ND					
6. Transit Asset Management	ND					
7. Satisfactory Continuing Control	ND					
8. Maintenance	ND					
9. Procurement	ND					
10. [Reserved]	NA					
11. Title VI	ND					
12. Americans with Disabilities Act (ADA) – General	ND					
13. ADA – Complementary Paratransit	ND					
14. [Reserved]	NA					
15. School Bus	ND					
16. Charter Bus	ND					
17. Drug-Free Workplace	ND					
18. Drug and Alcohol Program	ND					
19. Section 5307 Program Requirements	ND					
20. Section 5310 Program Requirements	ND					
21. Section 5311 Program Requirements	NA					

Review Area	Finding	Deficiency Code(s)		Corrective Action(s)	Response Due Date(s)	Date Closed
		Code	Description			
22. Public Transportation Agency Safety Plan	ND					
23. Cybersecurity	NA					

The metrics used to evaluate whether a recipient is meeting the requirements for each of the areas reviewed are:
Deficient (D)/Not Deficient (ND)/Not Applicable (NA).

II. Review Background and Process

1. Review Background

The United States Code, Chapter 53 of Title 49 (49 U.S.C. 5307(f)(2)) requires that “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...”

The Triennial Review includes a review of the recipient’s compliance in up to 23 areas. The basic requirements for each of these areas are summarized in Section IV. FTA contracts with experienced reviewers to lead and conduct the Triennial Reviews, in partnership with the staff of the regional office.

This report presents the findings from the Triennial Review of the recipient. The review concentrated on procedures and practices employed since the recipient’s previous Triennial Review; however, when appropriate, FTA may have reviewed activities and policies from earlier periods to assess policies and the management of award funds during the review period. The specific documents reviewed and referenced in this report are available at the FTA regional office or the recipient’s location.

2. Process

The Triennial Review includes a pre-review assessment, a desk review and scoping meeting with FTA staff, and a site visit to the recipient’s location. The review activities occurred between January 8, 2026, and July 10, 2026, as stated in the table below.

The review began with the regional office transmitting a “Notification of Review and a Recipient Information Request (RIR)”. Thereafter, FTA conducted a desk review and scoping meeting, which included review of FTA files and recipient information in FTA’s electronic award management systems: Transit Award Management System (TrAMS) and Oversight Tracking System (OTrak). Following the desk review and scoping meeting, the reviewers and the recipient corresponded and exchanged information and documentation in preparation for the site visit. Prior to the site visit, the reviewer sent to the recipient an agenda package indicating the issues that would be discussed, records to be reviewed, and interviews to be conducted.

The site visit began with an entrance conference, at which the reviewers and FTA staff discussed the purpose of the Triennial Review and the review process. The Reviewers conducted additional interviews and reviewed documentation to evidence the recipient’s compliance with FTA requirements.

A Section 5307 and Section 5310 subrecipient, Span, Inc. of Denton, Texas, were reviewed to provide an overview of activities related to FTA-funded projects. The reviewers also examined a sample of maintenance records and procurement files during this review.

Upon completion of the site visit, the reviewers and FTA staff discussed preliminary findings with the recipient. Afterwards, the reviewers and FTA staff presented the findings at the exit conference. The table below summarizes key review dates. Section V of this report lists the individuals who participated in the site visit.

Process Date	Process
January 8, 2026	FTA transmittal of the Recipient Information Request (RIR)
February 27, 2026	Recipient Transmittal of RIR to Reviewers
March 25, 2026	FTA and Reviewers Scoping Meeting/Desk Review
May 15, 2026	Reviewer Transmittal of the Agenda Package
June 1, 2026	Site Visit: Entrance Conference
June 9, 2026	Virtual Exit Conference
June 18, 2026	Final Report to be sent to the Recipient within 45 business days from the Virtual Exit Conference date

III. Recipient Description

1. Organization

The North Central Texas Council of Governments (NCTCOG) has been a designated recipient of FTA funds since 2007. The NCTCOG is a voluntary association of, by, and for local governments, and was established to assist local governments in planning for common needs, cooperating for sound regional development. NCTCOG's purpose is to strengthen both the individual and collective power of local governments and to help them recognize regional opportunities, eliminate unnecessary duplication, and make joint decisions.

NCTCOG serves a 16-county region of North Central Texas, which is centered on the two urban centers of Dallas and Fort Worth. The population of the region is approximately 7 million persons. NCTCOG has over 236 member governments, including 16 counties, numerous cities, school districts, and special districts.

NCTCOG's Executive Board, composed of 17 locally elected officials and one ex officio non-voting member of the legislature, is the policy-making body for all activities undertaken by the Council of Governments, including program activities and decisions, regional plans, and fiscal and budgetary policies. The Board is supported by technical, study, and policy development committees and a professional staff headed by the Executive Director. The Executive Board is the fiduciary agent to the MPO, while the Regional Transportation Council (RTC) is the policy body to the MPO.

NCTCOG does not operate transit service. However, the agency provides funding, manages procurement activities, and performs oversight for subrecipients that operate transit service.

NCTCOG is the designated recipient for federal transit funding in the Dallas-Fort Worth-Arlington (DFWA) and Denton-Lewisville (DL) Urbanized Areas (UZAs) for the Enhanced Mobility of Seniors and Individuals with Disabilities, New Freedom, Job Access Reverse Commute, and Urbanized Area Formula Programs not served by existing local transit authorities in Dallas, Fort Worth, and Denton, Texas. As the designated recipient, NCTCOG is responsible for coordinating and allocating federal funds to transit providers in the region, coordinating subrecipient transit providers' annual program of projects, conducting oversight and monitoring activities to ensure subrecipient compliance with federal requirements, and identifying strategic projects to implement based on the regional public transportation coordinated plan, Access North Texas. In this role, NCTCOG is also responsible for developing and sponsoring a group Transit Asset Management (TAM) plan for its subrecipients, if requested.

NCTCOG passes through Section 5307 and Section 5310 funds to eight subrecipients, with three receiving funds from both programs: Public Transit Services (PTS), a non-profit organization; STAR Transit, a public bus transportation service; and Span, Inc., a non-profit organization. Two of NCTCOG's subrecipients, Denton County Transportation Authority (DCTA) and Trinity Metro, are also direct recipients of FTA funds. During the review period, the City of Dallas also served as a subrecipient to NCTCOG for a Section 5310 project, which ended in FY2024. NCTCOG has also facilitated the passthrough of supplemental COVID-19 funding via American Rescue Plan (ARP) and CARES funding programs, as well as Emergency Relief funding. NCTCOG does not have any service contractors or lessees.

2. Award and Project Activity

Below is a list of NCTCOG's open awards at the time of the review.

Award Number	Award Amount	Year Executed	Description
TX-2016-033-02	\$6,188,262	2016	NCTCOG FY 2016 Section 5307 Grant
TX-2017-058-00	\$5,573,905	2017	NCTCOG FY 2017 Section 5307 Grant
TX-2017-073-02	\$2,247,618	2017	NCTCOG FY 2017 Section 5310 Grant
TX-2019-027-01	\$1,934,844	2019	NCTCOG Partial FY18 Sec 5310 Grant
TX-2019-034-02	\$6,413,143	2019	NCTCOG FY 2018 Section 5307 Grant
TX-2020-086-02	\$12,099,657	2020	FY20 STBG (FHWA Flex Fund Transfer) - NCTCOG- Dallas to Fort Worth High Speed Transportation Connections Study
TX-2020-122-01	\$5,376,210	2020	NCTCOG FY 2019 Section 5307 Grant: Planning and Subrecipient Public Transportation - Capital and Operating
TX-2021-036-01	\$3,174,618	2021	NCTCOG FY2020 Section 5310 Grant
TX-2021-051-01	\$4,325,599	2021	NCTCOG FY2020 Section 5307 Grant: Planning and Subrecipient Public Transportation - Capital and Operating
TX-2022-073-00	\$25,000,000	2022	FY2020 BUILD (Lapsing Funds) - The North Texas Multimodal Operations, Velocity, Efficiency, and Safety Program
TX-2023-022-00	\$2,782,177	2023	NCTCOG FY2021 Section 5307 Grant: Planning and Subrecipient Public Transportation - Capital and Operating
TX-2023-090-00	\$269,698	2023	NCTCOG FY 2021 Areas of Persistent Poverty Program (AoPP) competitive grant award

Award Number	Award Amount	Year Executed	Description
TX-2024-010-01	\$2,393,860	2024	NCTCOG FY2022 Section 5310 Grant Admin
TX-2024-019-00	\$672,827	2024	NCTCOG FY2021 Section 5339 Grant: Buses and P2024roject Administration (Lapsing)
TX-2024-032-01	\$2,668,780	2024	NCTCOG FY2022 Section 5307 Grant: Planning and Subrecipient Public Transportation - Capital and Planning
TX-2024-051-02	\$1,197,000	2024	NCTCOG FY2021 Lapsing CRRSAA Funds for Regional Vanpool Activity
TX-2025-002-00	\$7,215,731	2024	NCTCOG FY2023 Section 5307 Grant: Planning and Subrecipient Public Transportation - Capital and Planning
TX-2025-102-00	\$571,294	2025	LAPSING - NCTCOG FY2022 Section 5339 Grant: Buses and Project Administration
TX-2025-111-00	\$4,678,083	2025	NCTCOG FY2023 Section 5310 Award - Mobility Management, 3rd Party Services, Operating and Admin
TX-2025-138-00	\$4,002,386	2025	NCTCOG FY2024 Section 5307 - Project Admin, Mobility Management, and Operating
TX-2025-154-00	\$1,000,000	2025	NCTCOG FY 2024 Section 20005(b) Pilot Program for Transit-Oriented Development (TOD) Planning

Projects Completed

In the past few years, NCTCOG has completed the following noteworthy projects:

- Completed facility repairs, using an Emergency Relief grant to repair damage to PTS's facility caused by the severe winter storm in 2021. (FTA Funded)
- Completed the non-EV component of the 2021 Joint Vehicle Procurement. (FTA funded)
- Projects selected under the Strategic Partnerships Funding Program, formerly the call for Projects, which included the award of approximately \$1.89M in Enhanced Mobility of Seniors and Individuals with Disabilities Program to implement services in Collin County, Dallas County, Ellis County, and the cities of Arlington and Forest Hill. Approximately \$2.26M in Urbanized Area Formula Funding was awarded for services in the cities of Arlington and Mansfield. (FTA funded)
- Adopted Regional Public Transportation Safety Plan safety performance measures for FY2026-FY2029. (FHWA/FTA combined planning funds)

- Completed Silver Line Corridor TOD Planning Study. The study analyzed the future build-out of nine DART Silver Line Rail Stations to support more TOD. The plan created recommendations for active transportation first/last mile, parking ratios and management for TOD, and land use strategies for each station area to optimize the corridors' transit trips and economic development. (FTA funded)
- Completed the North Central Texas Regional Transit 2.0: Planning for the Year 2050 Study. The study includes strategies and recommendations for fostering partnerships and effective collaboration among transit authorities and city leaders throughout North Texas. (Non-FTA funded)
- Developed a transit planning and implementation plan for Denton County. This study included an independent transit needs assessment and a strategic implementation plan focused on areas not included in existing Denton County Transportation Authority transit service areas. (FTA-Funded)
- Intermodal Transportation Hubs for Colleges and Universities Study Development of a comprehensive guide for planning and strategic implementation of mobility hubs at college and university campuses around the region. The study produced a regional mobility hub catalog, serving as a guide to regional campuses, and produced a Mobility Hub report of one of the region's largest campuses to be adapted as a guide for other colleges and universities in the North Central Texas region. (Non-FTA Funded)
- GIS mapping work for transit partners, including developing and maintaining publicly accessible datasets for transit provider service areas and transit routes, as well as a custom web map application to assist Span, Inc. with accurately dispatching trips. (FHWA/FTA combined planning funds)
- Led the development and coordination needed to finalize the transit projects, programs, and policies in Mobility 2050, including maps, general documentation, and financial information. (FHWA/FTA combined planning funds)
- Continued implementation and coordination for the two federally required regional transit performance measures, Transit Asset Management and Public Transportation Agency Safety Plan. (FTA-funded + FHWA/FTA combined planning funds)

Ongoing Projects

NCTCOG is currently implementing the following noteworthy projects:

- Program administration, project implementation, grant management, and program oversight for all subgrantees who receive funds through the Bus and Bus Facilities Program, Congestion Mitigation and Air Quality Improvement Program, Enhanced Mobility of Seniors and Individuals with Disabilities Program, Job Access/Reverse Commute Program, New Freedom Program, and the Urbanized Area Formula Program. (FTA funded)

- Implemented operational support for Southern Dallas Inland Port transit services through alternative funding after operations were identified as ineligible under the FY21 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) discretionary grant award (Mixed FTA and non-FTA funded)
- Coordinating the non-EV component of the 2024 Joint Vehicle Procurement. (FTA funded)
- Implementation of the FY21 Areas of Persistent Poverty Grant awarded to NCTCOG to engage residents and stakeholders in Fort Worth's 76104 zip code to identify transit solutions that connect residents to healthy food, healthcare, affordable housing, jobs, and other needs. The recommendations from the study associated with this grant will be shared with the local transit agency and other stakeholders, along with funding guidance and a pedestrian access study. (FTA funded)
- Development of the FY21 Rebuilding American Infrastructure with Sustainability and Equity (RAISE) discretionary grant awarded to NCTCOG to implement mobility enhancements to and within the Southern Dallas Inland Port. (FTA funded)
- Implementation of the Transit Oriented Development (TOD) Trinity Railway Express Strategic Plan to advance connected TOD opportunities and economic development along the Trinity Railway Express (TRE) corridor. The plan will address redevelopment around the seven (7) TRE commuter rail stations in Fort Worth, Irving, and Dallas in support of Trinity Metro and Dallas Area Rapid Transit's efforts to double-track the TRE and increase transit ridership and economic development. (FTA Funded)
- Development of the 2026 comprehensive update to Access North Texas, the region's coordinated public transit-human services transportation plan. The updated plan includes public outreach, involvement, and assessment of transportation needs in the 16-county region. (FTA funded)
- Implementation of an American with Disabilities Act (ADA) assessment of the McKinney Avenue Trolley M-Line system on requirements needed to bring the system into ADA-compliance, including identifying access requirements and options, developing an implementation program, timeline, and resources needed. (Non-FTA funded)
- Implementation of biannual cycles of the Transit Strategic Partnership Program to evaluate projects and award funds from two FTA programs: Urbanized Area Formula Program projects and the Enhanced Mobility of Seniors and Individuals with Disabilities Program. The program is currently being evaluated regarding whether it will be continued or not. (FTA funded)
- Implementation of the Transit Passes for Community Colleges program with Trinity Metro to provide free transit passes to students of Tarrant County College (TCC), and developing a transit passes pilot program for students in Dallas County. (Non-FTA funded)
- Implementation of capital and operating support for the McKinney Avenue Transit Authority for fleet improvements and operating assistance in support of changes to

local transit services and increased ridership due to World Cup events. (Non-FTA funded)

- Development of a transit planning and implementation plan for a combined study area within Eastern Dallas County, Kaufman County, and Rockwall County. Like previous studies, this study is also performing an independent transit needs assessment and strategic implementation plan focused on areas not included in existing transit Dallas Area Rapid Transit service areas. (FTA-Funded)
- The Dallas-Fort Worth High-Speed Transportation Connections Study, initiated in 2020, seeks to environmentally clear a high-speed transportation corridor between Fort Worth and Dallas to connect to other planned high-speed transportation systems in the state. This study is split into two phases. Phase 2 efforts are continuing and include conceptual and preliminary engineering of a preferred alignment and environmental analysis and documentation through the National Environmental Policy Act (NEPA) process. (FTA funded)
- The McKinney Avenue Transit Authority (MATA) M-Line Trolley Extension Feasibility Study that will assess initial purpose and need, design, cost, and funding details of the extension to determine overall feasibility and provide a foundation for future design and environmental work on the corridor. (Non-FTA funded)
- Federal Railroad Administration (FRA) Corridor Identification and Development (Corridor ID) Step 1 grant project, which will develop a scope, schedule, and budget for a future Service Development Plan for the Fort Worth-Houston high-speed rail corridor. (Non-FTA funded)
- NT MOVES is a program of road and railway improvements in the North Central Texas region intended to enhance freight and passenger mobility across all modes. The project is comprised of three components along the Trinity Railway Express (TRE) commuter rail corridor connecting Dallas and Fort Worth. Components 1 and 2 include the double tracking of Medical Market Center to Stemmons Freeway and Handley Ederville Road to Precinct Line Road section of the TRE corridor, with Component 3 covering the implementation of Clear Path Technology in the region. Both Components 1 and 2 have reached 100% final design and are scheduled to begin construction in 2026. Component 3 has completed data onboarding and is ready to proceed with test carrier data pending the finalization of the data sharing agreements with project partners. (FTA-Funded)

Future Projects

NCTCOG is currently planning the following projects within three to five years:

- NCTCOG will continue to assist regional transit authorities and our subrecipients with addressing service expansion as population growth continues by creatively utilizing

existing federal funds and identifying additional sources of federal and non-federal funding sources. (FTA funded)

- NCTCOG will kick off two additional BUS (Buses for Urbanized Service) Vehicle Procurements in 2026 and 2028. (FTA funded)
- NCTCOG will publish an RFI on transit scheduling software to support subrecipients' procurement of needed scheduling software as needs arise. (FTA Funded)
- NCTCOG will implement a regional safety coordination effort for small transit providers to collaborate, share best practices, and identify safety tools for their safety management systems (FTA funded)
- NCTCOG will implement an ADA study for small transit providers to evaluate gaps and identify areas of improvement above and beyond the ADA (FTA funded)
- NCTCOG will conduct a planning study and implement findings to improve transit workforce development, including recruitment and retention of transit operators (FTA funded)
- NCTCOG subrecipients will implement new service areas and construct new transit facilities including parking facilities
- NCTCOG will continue to assist regional transit authorities and our subrecipients with addressing service expansion as population growth continues by creatively utilizing existing federal funds and identifying additional sources of federal and non-federal funding sources. (FTA funded)
- NCTCOG will complete a comprehensive update to Access North Texas in 2030, the region's coordinated public transit-human services transportation plan. The updated plan will include outreach and assessment of transportation needs in the 16-county region. (FTA funded)
- NCTCOG will implement a study of the Cotton Belt Train Connections to Rail Stations to address trail and bikeway connections at three TEXRail stations located in Fort Worth and North Richland Hills. (Non-FTA funded)
- To advance the recommendations of Transit 2.0 and the priorities of the Regional Transportation Council (RTC), NCTCOG will advance an Analysis of Legislative Action needed at the state level related to Regional Rail and develop Regional Rail operational options and paths forward. (Non-FTA funded)
- In coordination with FRA, NCTCOG will advance Step 2 of the Corridor ID project if the Step 1 project is approved by FRA. This project would create a complete Service Development Plan for the Fort Worth-Houston high-speed rail corridor based on the scoping deliverables from Step 1. (Non-FTA funded)
- NCTCOG will continue GIS mapping efforts and expand that work as needed to serve the needs of the transportation department and any transit partners in the region. (FHWA/FTA combined planning funds)
- NCTCOG will complete a Western Regional Transit Access Study, which will perform an independent transit needs assessment and strategic implementation plan focused on

areas not included in existing Trinity Metro transit service areas in western Tarrant County and eastern Parker County. (FTA-Funded)

- NCTCOG will conduct transit-related work for the next long-range metropolitan transportation plan, which will include similar work to that done for Mobility 2050. (FHWA/FTA combined planning funds)
- Other planning and technical assistance efforts that are requested and developed as a result of the implementation of NCTCOG's Regional Transit 2.0 study. (unknown).

IV. Results of the Review

1. Legal

Basic Requirement: The recipient must promptly notify FTA of legal matters and additionally notify the USDOT Office of Inspector General (OIG) of any instances relating to false claims under the False Claims Act or fraud. Recipients must comply with restrictions on lobbying requirements.

Finding: No deficiency.

2. Financial Management and Capacity

Basic Requirement: The recipient must have financial policies and procedures; an organizational structure that defines, assigns, and delegates fiduciary authority; and financial management systems in place to manage, match, and charge only allowable costs to the award. The recipient must conduct required Single Audits, as required by 2 CFR part 200, and provide financial oversight of subrecipients.

Finding: No deficiency.

3. Technical Capacity – Award Management

Basic Requirement: The recipient must report progress of projects in awards to FTA and close awards timely.

Finding: No deficiency.

4. Technical Capacity – Program Management & Subrecipient Oversight

Basic Requirement: Designated Recipients and States must document and follow a public involvement process for the development of the long-range statewide transportation plan and State Transportation Improvement Program (STIP). Designated recipients of Section 5310 funds and States receiving funds from Sections 5310, 5311, and 5339(a) National Distribution allocation must develop and submit a State Management/Program Management Plan to FTA for approval. Recipients must enter into an agreement with each subrecipient, obtain required certifications from subrecipients, report SAM.gov on subawards, and ensure subrecipients comply with the terms of the award.

Finding: No deficiency.

5. Technical Capacity – Project Management

Basic Requirement: The recipient must implement FTA-funded projects in accordance with the award application, FTA Master Agreement, and applicable laws and regulations using sound management practices.

Finding: No deficiency.

6. Transit Asset Management

Basic Requirement: Recipients must comply with 49 CFR part 625 to ensure public transportation providers develop and implement transit asset management (TAM) plans.

Finding: No deficiency.

7. Satisfactory Continuing Control

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

Finding: No deficiency.

8. Maintenance

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

Finding: No deficiency.

9. Procurement

Basic Requirement: The recipient and subrecipient must use its own documented procurement procedures, which reflect applicable State, local, and tribal laws and regulations, and conform to applicable Federal law and the standards identified in 2 CFR 200. With regard to the procurement standards in 2 CFR 200, state recipients can use the state's overall policies and procedures, except that the state must comply with 200.322 (domestic preferences), 200.323 (procurement of recovered materials), and 200.327 (contract provisions). States also must comply with any requirement applicable to FTA recipients by reason other than a 2 CFR 200 procurement standard; for example, 49 U.S.C. 5325(a) requires recipients to conduct all procurement transactions in a manner that provides full and open competition, regardless of 2 CFR 200's allowance for states to use state procedures.

Finding: No deficiency.

10. [Reserved]

11. Title VI

Basic Requirement: The recipient 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 recipient must ensure that all transit services and related benefits are distributed in an equitable manner.

Finding: No deficiency.

12. Americans with Disabilities Act (ADA) – General

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: No deficiency.

13. ADA – Complementary Paratransit

Basic Requirement: Under 49 CFR 37.121(a), each public entity operating a fixed-route system shall provide paratransit or other special service to individuals with disabilities that is comparable to the level of service provided to individuals without disabilities who use the fixed-route system. “Comparability” is determined by 49 CFR 37.123-37.133. Requirements for complementary paratransit do not apply to commuter bus, commuter rail, or intercity rail systems.

Finding: No deficiency.

14. [Reserved]

15. School Bus

Basic Requirement: Recipients are prohibited from providing school bus service in competition with private school bus operators 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.

Finding: No deficiency.

16. Charter Bus

Basic Requirement: Recipients are prohibited from using FTA-funded equipment and facilities to provide charter service that unfairly competes with private charter operators. Recipients may operate charter only when the service meets a specified exception defined in rule.

Finding: No deficiency.

17. Drug-Free Workplace Act

Basic Requirement: Recipients are required to maintain a drug-free workplace for all award-related employees; report any convictions occurring in the workplace timely; and have an ongoing drug-free awareness program.

Finding: No deficiency.

18. Drug and Alcohol Program

Basic Requirement: Recipients 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: No deficiency.

19. Section 5307 Program Requirements

Basic Requirement: The recipient must participate in the transportation planning process in accordance with FTA requirements and the metropolitan and statewide planning regulations.

Recipients shall develop, publish, afford an opportunity for a public hearing on, and submit for approval, a program of projects.

Recipients 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.

For fixed-route service supported with Section 5307 assistance, fares charged seniors, persons with disabilities, or individuals presenting a Medicare card during off-peak hours will not be more than one-half the peak hour fares.

Finding: No deficiency.

20. Section 5310 Program Requirements

Basic Requirement: Recipients must expend Section 5310 funds on eligible projects that meet the specific needs of seniors and individuals with disabilities. Projects selected for funding must be included in a locally developed, coordinated public transit-human services transportation plan. Recipients must approve all subrecipient leases of Section 5310-funded vehicles. Leases of Section 5310-funded vehicles must include required terms and conditions. Either the recipient or subrecipient must hold the title to the leased vehicles.

Finding: No deficiency.

21. Section 5311 Program Requirements

Basic Requirement: States must expend Section 5311 funds on eligible projects to support rural public transportation services and intercity bus transportation.

Finding: This section only applies to recipients that receive Section 5311 funds directly from FTA; therefore, the related requirements are not applicable.

22. Public Transportation Agency Safety Plan

Basic Requirement: Recipients must comply with the Public Transportation Agency Safety Plan (PTASP) regulation (49 CFR Part 673) to ensure public transportation providers develop and implement an Agency Safety Plan (ASP). The PTASP Final Rule published in the Federal Register on April 11, 2024, became effective May 13, 2024. FTA expects transit agencies to address the regulatory changes in the new PTASP Final Rule in their next Agency Safety Plan (ASP) annual update.

FTA requires applicable recipients to certify that they have established an ASP that meets the requirements of the PTASP regulation and 49 U.S.C. 5329(d) as part of the annual Certifications and Assurances for FTA grants and cooperative agreements. FTA notes that per 49 U.S.C. 5307(c)(1)(L), this certification is a required condition of receiving Section 5307 funding (though noncompliance can impact access to Section 5307 funding as well as other grant funds where 5307 requirements apply). FTA monitors these certifications in its Transit Award Management System (TrAMS).

Finding: No deficiency.

23. Cybersecurity

Basic Requirement: Recipients that operate rail fixed guideway public transportation systems must certify compliance with the requirements for establishing a cybersecurity process under 49 U.S.C. § 5323(v).

Finding: No deficiency.

V. Attendees

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VI. Appendices