



BOARD OF DIRECTORS REPORT

MEETING DATE: JULY 20, 2021 **AGENDA ITEM: #10**
DEPARTMENT: COMPLIANCE
TYPE: INFORMATIONAL ITEM
PREPARED BY: STEVE MAAS _____
Signature
REVIEWED BY: GENERAL MANAGER _____
Signature
SUBJECT: FTA FISCAL YEAR 2021 TRIENNIAL REVIEW OF MTD

RECOMMENDATION:

Staff request that the Board receive a report regarding the recent Triennial Review of MTD conducted by the FTA.

DISCUSSION:

The Triennial Review is one of the Federal Transit Administration's (FTA) management tools for examining recipient performance and adherence to current FTA requirements and policies. The Triennial Review, which was mandated by Congress in 1982, examines how recipients of FTA Urbanized Area Formula Program funds (Section 5307) meet statutory and administrative requirements. In addition to helping evaluate grantees, the review gives FTA an opportunity to provide technical assistance on FTA requirements and aids FTA in reporting to the USDOT Secretary, Congress, other oversight agencies, and the transit community on the Urbanized Area Formula Program.

The FTA recently completed its most recent Triennial Review of MTD. The review was originally scheduled to be completed in the spring of 2020, but was delayed for one year due to the COVID-19 pandemic. As stated in the Draft Report (attached), the FTA found no deficiencies in MTD's practices.

The Triennial Review requires the collection of a great deal of information and the submittal of this information to the reviewer prior to the reviewer's meetings with MTD staff. Each MTD department provides information, and each department contributes to maintaining MTD's exemplary record of compliance with FTA's myriad of requirements.

Typically, the reviewer would visit the agency in person; however, due to the pandemic, the meetings for this review were virtual. General Manager Estrada and Grants & Compliance Manager Maas participated in two virtual meetings with the reviewer and FTA staff.

FTA organizes their requirements into the following 21 categories:

1. Legal

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2. Financial Management and Capacity
3. Technical Capacity - Award Management
4. Technical Capacity - Program Management and Subrecipient Oversight
5. Technical Capacity - Project Management
6. Transit Asset Management
7. Satisfactory Continuing Control
8. Maintenance
9. Procurement
10. Disadvantaged Business Enterprise
11. Title VI
12. Americans with Disabilities Act - General
13. Americans with Disabilities Act - Complementary Paratransit
14. Equal Employment Opportunity
15. School Bus (n/a for MTD)
16. Charter Bus (n/a for MTD)
17. Drug-Free Workplace Act
18. Drug and Alcohol Program
19. Section 5307 Program Requirements
20. Section 5310 Program Requirements (n/a for MTD)
21. Section 5311 Program Requirements (n/a for MTD)

For this Triennial Review, Items 20 and 21 did not apply to MTD as the agency does not currently receive funding from those programs. Items 15 and 16 also did not apply, as MTD currently offers neither charter bus nor school bus service (MTD's booster services, referred to as "school trippers" by FTA, are not classified as school bus service).

It is expected that the population of the Santa Barbara urbanized area (UZA), as enumerated by the 2020 Census, will have exceeded 200,000 persons. The Santa Barbara UZA will then be classified as a large UZA. If so, MTD will be responsible for complying with additional FTA requirements beyond those the agency is currently subject to, including:

1. More frequent reporting requirements for some FTA awards.
2. Resident Inspectors required when purchasing 10 or more buses (rather than 20 as now).
3. The most significant changes occur in Title VI (non-discrimination). Additional requirements include :
 - a. Demographic analyses of the transit provider's service area. This shall include demographic maps and charts completed since submission of the last Title VI Program that contains demographic information and service profiles.
 - b. Data regarding customer ridership demographics and travel patterns, collected from passenger surveys.
 - c. Results of the monitoring program of service standards and policies and any action taken, including documentation (e.g., a resolution, copy of meeting minutes, or similar documentation) to verify the Board's consideration, awareness, and approval of the monitoring results.

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- d. A description of the public engagement process for setting the major service change policy, disparate impact policy, and disproportionate burden policy.
- e. A copy of a Board resolution demonstrating the Board's consideration, awareness, and approval of the major service change policy and disparate impact policy.
- f. Results of equity analyses for any major service changes and/or fare changes implemented since the last Title VI Program submission.
- g. A resolution demonstrating the Board's consideration, awareness, and approval of the equity analysis for any service or fare changes.

Additionally, in a large UZA the relationship between FTA and the UZA is different than that with a small UZA. Currently, MTD is a "Direct Recipient," which allows the agency to receive funds directly from FTA. The state (Caltrans) is the "Designated Recipient" for all small UZAs in California, and must approve requests for FTA funds by a Direct Recipient serving a small UZA.

If the Santa Barbara UZA becomes a large UZA, a Designated Recipient must be identified in accordance with the planning process under Title 49 of the United States Code, Sections 5303, 5304, and 5306. Possible choices as a Designated Recipient include Direct Recipients, the area Metropolitan Planning Organization (MPO), or the State. In the Santa Barbara UZA, those choices would be MTD (the sole Direct Recipient), SBCAG (the MPO), or Caltrans (the State).

A Designated Recipient for a large UZA is responsible for receiving and apportioning funds from FTA formula programs, including applying for and managing the award and overseeing subrecipients of the funds.

ATTACHMENT:

- Draft Report of the Fiscal Year 2021 Triennial Review of the Santa Barbara Metropolitan Transit District.



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

REGION IX
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Hawaii, Nevada, Guam,
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July 8, 2021

Mr. Dave Davis
Chair, SBMTD Board of Directors
1226 W. Valerio St.
Santa Barbara, CA 93101

RE: Federal Transit Administration
Fiscal Year 2021 Triennial Review –
Final Report

Dear Mr. Davis:

I am pleased to provide you with a copy of this Federal Transit Administration (FTA) report as required by 49 U.S.C. Chapter 53 and other federal requirements. The enclosed final report documents the FTA's Triennial Review of the Santa Barbara Metropolitan Transit District (SBMTD) of Santa Barbara, California. Although not an audit, the Triennial Review is the FTA's assessment of SBMTD's compliance with federal requirements, determined by examining a sample of award management and program implementation practices. As such, the Triennial Review is not intended as, nor does it constitute, a comprehensive and final review of compliance with award requirements.

The Triennial Review focused on SBMTD's compliance in 21 areas. No deficiencies were found with FTA requirements in any areas. We commend SBMTD on this outstanding review.

Given the delay in completing the FY 2020 reviews until FY 2021 and the significant amount of additional federal financial support provided through CARES Act, FTA developed the [Public Health Emergency Supplement](#) to the [FY 2020 Comprehensive Review Contractors' Manual](#) to assist in the evaluation of how recipients have used CARES Act and Emergency Relief funding. This supplement details the specific flexibilities and administrative relief provided by FTA for the use of these funds.

Regulations and Guidance

As SBMTD moves forward with its transit program, FTA would like to provide a look-ahead for future oversight activities related to new and/or updated requirements, below.

Public Transportation Agency Safety Plan (PTASP) Regulation

The PTASP regulation requires all operators of public transportation systems that are recipients and subrecipients of FTA's Urbanized Area Formula Grants (Section 5307) to develop safety plans that include the processes and procedures to implement Safety Management Systems (SMS). FTA has deferred applicability of this requirement for operators that only receive funds through FTA's Enhanced Mobility of Seniors and Individuals with Disabilities Formula Program (Section 5310) and/or Rural Area Formula Program (Section 5311).

As part of the Annual Certifications and Assurances, transit operators must certify they have a safety plan in place for meeting the requirements of the rule by July 20, 2020. However, in response to the COVID-19 public health emergency, on December 11, 2020, FTA issued a Notice of Enforcement Discretion, effectively extending the PTASP compliance deadline to July 21, 2021. All plans will be reviewed starting October 1, 2021, through FTA's oversight process. For guidance and updates to assist in the preparation and implementation of the PTASP Final Rule, please visit FTA's website at www.transit.dot.gov/PTASP.

Random Drug Testing Rate Increase

On October 17, 2018, FTA published a Dear Colleague letter "2019 Random Drug Testing Increase." In its letter, FTA notified recipients that effective January 1, 2019 and as mandated by its drug and alcohol regulation at 49 C.F.R. 655.45, the random drug testing rate will change. FTA increased the minimum rate of random drug testing from 25 percent to 50 percent of covered employees, for employers subject to FTA's drug and alcohol regulation. This increased random drug testing rate results from an uptick in the proportion of violations identified through random drug testing.

The 50 percent random drug testing rate applies to entities receiving federal assistance under 49 U.S.C. 5307, 5309, 5311 or 5339, including recipients, subrecipients, and safety-sensitive contractors. The required minimum rate for random alcohol testing is unaffected and remains at 10 percent.

Thank you for your cooperation and assistance during this Triennial Review. If you need any technical assistance or have any questions, please do not hesitate to contact Ms. Stacy Alameida, Transportation Program Specialist, at (213) 202-2953, or by email at stacy.alameida@dot.gov.

Kudos on the effort by all staff to conclude this review with no findings and no repeat findings.

Sincerely,

Ray Tellis
Regional Administrator

Enclosure

FINAL REPORT

**FISCAL YEAR 2021
TRIENNIAL REVIEW**

of

**Santa Barbara Metropolitan Transit District
(SBMTD)
Santa Barbara, California
ID: 1673**

Performed for:

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

Prepared By:

RLS & Associates, Inc.

Scoping Meeting Date: February 12, 2020

Virtual Site Visit Date: May 3-7, 2021

Final Report Date: July 8, 2021

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I. Executive Summary

This report documents the Federal Transit Administration's (FTA) Triennial Review of the Santa Barbara Metropolitan Transit District (SBMTD) of Santa Barbara, California. 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 virtual site visit, administrative and statutory requirements were discussed and documents were reviewed.

The Triennial Review focused on SBMTD's compliance in 21 areas. There were no deficiencies.

II. Review Background and Process

1. Background

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

The Triennial Review includes a review of the recipient’s compliance in 21 areas. The basic requirements for each of these areas are summarized in Section IV.

This report presents the findings from the Triennial Review of SBMTD. The review concentrated on procedures and practices employed during the past three years; however, coverage was extended to earlier periods as needed to assess the policies in place and the management of award funds. The specific documents reviewed and referenced in this report are available at the FTA’s regional office or the recipient’s office.

2. Process

The Triennial Review process includes a pre-review assessment and scoping meeting with the FTA Region IX Los Angeles Office and a virtual site visit. The review scoping meeting was conducted on February 12, 2020. Necessary files retained by the regional office were sent to the reviewer electronically. A recipient information request was sent to SBMTD on October 30, 2019 indicating a review would be conducted during Fiscal Year 2020. In March 2020, all work on reviews was halted due to the Public Health Emergency. A subsequent recipient information request was sent to SBMTD on October 15, 2020 advising that a virtual site visit would be taking place and indicating additional information that would be needed and issues that would be discussed. The virtual site visit to SBMTD occurred on May 3-7, 2021.

The virtual site visit portion of the review began with an entrance conference, at which the purpose of the Triennial Review and the review process were discussed. The remaining time was spent discussing administrative and statutory requirements and reviewing documents. In addition, the reviewers evaluated how SBMTD has used CARES Act and ER funding and the impacts of the COVID-19 Public Health Emergency on the agency by discussing a series of questions included in the supplement to the FFY 2020 Contractors’ Manual. Additional documentation was requested for the Financial Management and Capacity and Procurement areas only. The reviewer examined a sample of maintenance records for FTA-funded vehicles and equipment.

Upon completion of the review, FTA and the reviewer provided a summary of preliminary findings to SBMTD at an exit conference. Section VI of this report lists the individuals participating in the review.

3. Metrics

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

- *Not Deficient*: 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*: An area is considered deficient if any of the requirements within the area reviewed were not met.
- *Not Applicable*: An area can be deemed not applicable if, after an initial assessment, the recipient does not conduct activities for which the requirements of the respective area would be applicable.

III. Recipient Description

1. Organization

SBMTD provides transit service in the southern area of Santa Barbara County, between the Ventura County border to the east and Winchester Canyon at the western edge of Goleta. The service area encompasses the cities of Santa Barbara, Goleta, and Carpinteria and the unincorporated communities of Montecito, Summerland, and Isla Vista. A seven-member Board of Directors governs SBMTD. Two members are appointed by the County Board of Supervisors, two by the Santa Barbara City Council, one by the Goleta City Council, and one by the Carpinteria City Council. The seventh member, an at-large director, is appointed by the other six members of the Board. The population of SBMTD's service area is approximately 199,688 persons.

SBMTD directly operates fixed-route service and contracts for ADA complementary paratransit with Easy Lift Transportation, Inc., a non-profit organization that is the designated Consolidated Transportation Service Agency for South Santa Barbara County.

Prior to the COVID-19 pandemic, SBMTD operated a network of 24 regular routes consisting of local service; seaside and downtown electric shuttle routes; and school trippers, identified on maps and schedules as Booster Routes. Beginning in March 2020, several routes, primarily serving educational institutions, were suspended. SBMTD intends to reinstate most of those routes following the end of the pandemic.

Fixed-route services are provided weekdays from 5:25 a.m. Monday through 12:30 a.m. Saturday. Weekend service resumes Saturdays at 6:00 a.m. and operates until 11:20 p.m. Sunday service is operated from 6:15 a.m. to 10:20 p.m. Easy Lift service operates during the same days and hours as the regular fixed routes.

The basic adult fare for bus service is \$1.75. A reduced fare of \$0.85 is offered to senior citizens, Medicare cardholders, and persons with disabilities during all hours. The fare for Easy Lift ADA paratransit service is \$3.50. Fares on the Seaside Shuttle and the Downtown-Waterfront Shuttle are \$0.50, with a \$0.25 half-fare. Day passes and discounted ten-ride or 30-day passes are also available.

SBMTD operates a fleet of 112 buses, 62 of which have FTA interest. The regular fixed-route fleet consists of diesel transit coaches, diesel-electric hybrid coaches, and battery-electric shuttle buses. Easy Lift operates 25 vehicles for ADA complementary paratransit service. Four of those vehicles were procured through the FTA Section 5339(a) program and are owned by SBMTD. Others have an FTA interest but were funded through Caltrans under the FTA Section 5310 program with no SBMTD involvement. SBMTD transferred five FTA-funded buses to the City of Santa Maria with FTA approval. During the COVID-19 pandemic, the current peak requirement was reduced to 74 vehicles due to the suspension of several routes; however, the peak requirement is expected to return to 94 following the end of the pandemic and the reinstatement of full service. SBMTD requested and FTA approved a spare ratio waiver in response to this situation.

SBMTD services are oriented primarily around the downtown Transit Center located at 1020 Chapala Street in Santa Barbara. The maintenance and operations terminal along with the administrative offices are located at 550 Olive Street in Santa Barbara. SBMTD also owns Terminal 2 at 5353 Overpass Road in Goleta. This property formerly served as SBMTD’s primary bus garage but had been leased to a private company for storage under an FTA-approved excess real property agreement. SBMTD is in the process of reactivating this facility for transit use. All facilities have FTA interest.

2. Award and Project Activity

Below is a list of SBMTD’s open awards at the time of the review.

Award Number	Award Amount	Year Executed	Description
CA-2018-037	6084394	2018	FY 2016 Section 5339(b) Bus Acquisition
CA-2020-100	16390496	2020	SBMTD Section 5307 CARES Act Operating Assistance

Projects Completed

In the past few years, SBMTD completed the following noteworthy projects (FTA funded projects are in bold):

- **40’ Diesel Bus (10 replacement)**
- **30’ Electric Bus (14 replacement) - 8 FTA funded**
- **ADA Paratransit Vans (4 replacements - through Caltrans)**
- ADA Paratransit Van (replacement)
- Automatic Vehicle Location Project
- Electronic Farebox/Smartcard Project
- Transit Center Renovation
- Facilities Master Plan and Power Modeling Study
- Electric Service Vehicle (14 replacement)
- Electric Service Vehicle Charging Infrastructure
- Five-Year Marketing Plan.

Ongoing Projects

SBMTD is currently implementing the following noteworthy projects:

- **40' Electric Bus (4 replacement)**
- **Revenue Fleet Refurbishment/Overhaul**
- **Enhancement to Line 28 serving UCSB**
- **Amtrak Connecting Service (First/Last Mile)**
- **New Microtransit Service**
- Microtransit Service Electric Vans (3 expansion)
- Electric Heavy-Duty Charging Infrastructure
- Bus Stop Shelter Additions/Replacements/Refurbishments.

Future Projects

SBMTD plans to pursue the following noteworthy projects in the next three to five years:

- Modernization of Terminal 1
- Reactivation of Terminal 2 as a second bus yard
- Revenue Fleet Replacements
- Photovoltaic System for Facilities
- New SBCC-Carpinteria Express Service (Hwy 101 Mitigation).

IV. Results of the Review

1. Legal

Basic Requirement: The recipient must promptly notify the FTA of legal matters, include clauses in its third party and subrecipient agreements, and additionally notify the U.S. DOT 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: During this Triennial Review of SBMTD, no deficiencies were found with the FTA requirements for Legal.

2. Financial Management and Capacity

Basic Requirement: The recipient must have financial policies and procedures; an organizational structure that defines, assigns and delegates authority; and financial management systems in place to match, manage, and charge only allowable cost to the award. The recipient must conduct required single audits and provide financial oversight of subrecipients.

Finding: During this Triennial Review of SBMTD, no deficiencies were found with the FTA requirements for Financial Management and Capacity.

3. Technical Capacity – Award Management

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

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

4. Technical Capacity – Program Management and Subrecipient Oversight

Basic Requirement: The recipient must follow the public involvement process for transportation plans; develop and submit a State Management/Program Management Plan to the FTA for approval; report in the Federal Funding Accountability and Transparency Act Subaward Reporting System (FSRS) on subawards; and ensure subrecipients comply with the terms of the award.

Finding: During this Triennial Review of SBMTD, no deficiencies were found with the FTA requirements for Technical Capacity – Program Management and Subrecipient Oversight. SBMTD has no subrecipients.

5. Technical Capacity – Project Management

Basic Requirement: The recipient must be able to implement FTA-funded projects in accordance with the award application, FTA Master Agreement, and all applicable laws and regulations, using sound management practices; and prepare force account plans.

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

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: During this Triennial Review of SBMTD, no deficiencies were found with the FTA requirements for Transit Asset Management.

7. Satisfactory Continuing Control

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

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

8. Maintenance

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

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

9. Procurement

Basic Requirement: The non-Federal entity 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 Part 200. State recipients can use the state's overall policies and procedures. When applied to Federal procurements, those policies and procedures must still be compliant with all Federal requirements as applied to non-state recipients. The flexibility afforded by 2 CFR Part 200 should not be misconstrued as absolving a state from Federal requirements. For example, FTA does not require each State DOT to have policies and procedures separate from the state education department.

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

10. Disadvantaged Business Enterprise (DBE)

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

Finding: During this Triennial Review of SBMTD, no deficiencies were found with the US DOT requirements for DBE.

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

12. Americans with Disabilities Act (ADA) – General

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

Finding: During this Triennial Review of SBMTD, no deficiencies were found with the US DOT requirements for ADA – General.

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: During this Triennial Review of SBMTD, no deficiencies were found with US DOT requirements for ADA – Complementary Paratransit.

14. Equal Employment Opportunity

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

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

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

16. Charter Bus

Basic Requirement: Recipients are prohibited from using FTA-funded equipment and facilities to provide charter service if a registered private charter operator expresses interest in providing the service. Recipients are allowed to operate community-based charter services pursuant to certain regulatory exceptions.

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

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: During this Triennial Review of SBMTD, no deficiencies were found with the FTA requirements for Drug-Free Workplace Act.

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

19. Section 5307 Program Requirements

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

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.

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

Finding: During this Triennial Review of SBMTD, no deficiencies were found with the FTA requirements for Section 5307 Program Requirements.

20. Section 5310 Program Requirements

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

Finding: This section applies only to recipients that receive Section 5310 funds directly from FTA; therefore, the related requirements are not applicable to the review of SBMTD.

21. Section 5311 Program Requirements

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

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

V. Summary of Findings

Review Area	Finding	Deficiency Code(s)	Corrective Action(s)	Response Due Date(s)	Date Closed
1. Legal	ND				
2. Financial Management and Capacity	ND				
3. Technical Capacity – Award Management	ND				
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. Disadvantaged Business Enterprise	ND				
11. Title VI	ND				
12. Americans with Disabilities Act (ADA) – General	ND				
13. ADA – Complementary Paratransit	ND				
14. Equal Employment Opportunity	ND				
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	NA				
21. Section 5311 Program Requirements	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)

VI. Attendees

Name	Title	Phone Number	E-mail Address
<i>Santa Barbara Metropolitan Transit District</i>			
Jerry Estrada	General Manager	805-963-3364 x232	jestrada@sbmtd.gov.org
Steve Maas	Manager of Government Relations & Compliance	805-963-3364 x227	smaas@sbmtd.gov.org
Brad Davis	Director of Finance and Administration	805-963-3364 x201	bdavis@sbmtd.gov.org
<i>FTA Region IX</i>			
Ray Tellis	Regional Administrator	415-734-9490	Ray.Tellis@dot.gov
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<i>RLS & Associates, Inc.</i>			
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VII. Appendices