

FTA

FEDERAL TRANSIT ADMINISTRATION

Grantee Compliance Training Priorities

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John Bodnar
Scott Giering
Office of Program Oversight



U.S. Department of Transportation
Federal Transit Administration

Background on Training Initiative

- Agency desire to take a more proactive approach to program oversight focused on:
 - Improving grantee compliance
 - Capacity building for grantees
- Feedback from grantees and FTA regional staff
- Commitments to APTA and the industry to enhance education, training opportunities, and assistance for grantees
- Continued high rate of findings in key compliance areas

Spectrum of Offerings to Match Need

Webinars & Online Training

- Topic specific
- Short duration
- Open to all

Workshops

- Broad compliance focus
- Multiple days
- In-person participation

Technical Assistance

- Grantee specific
- Longer duration
- High level of interaction

Increasing level of effort and degree of personalization

Outcome: Fewer Findings

Program Oversight's Training Program

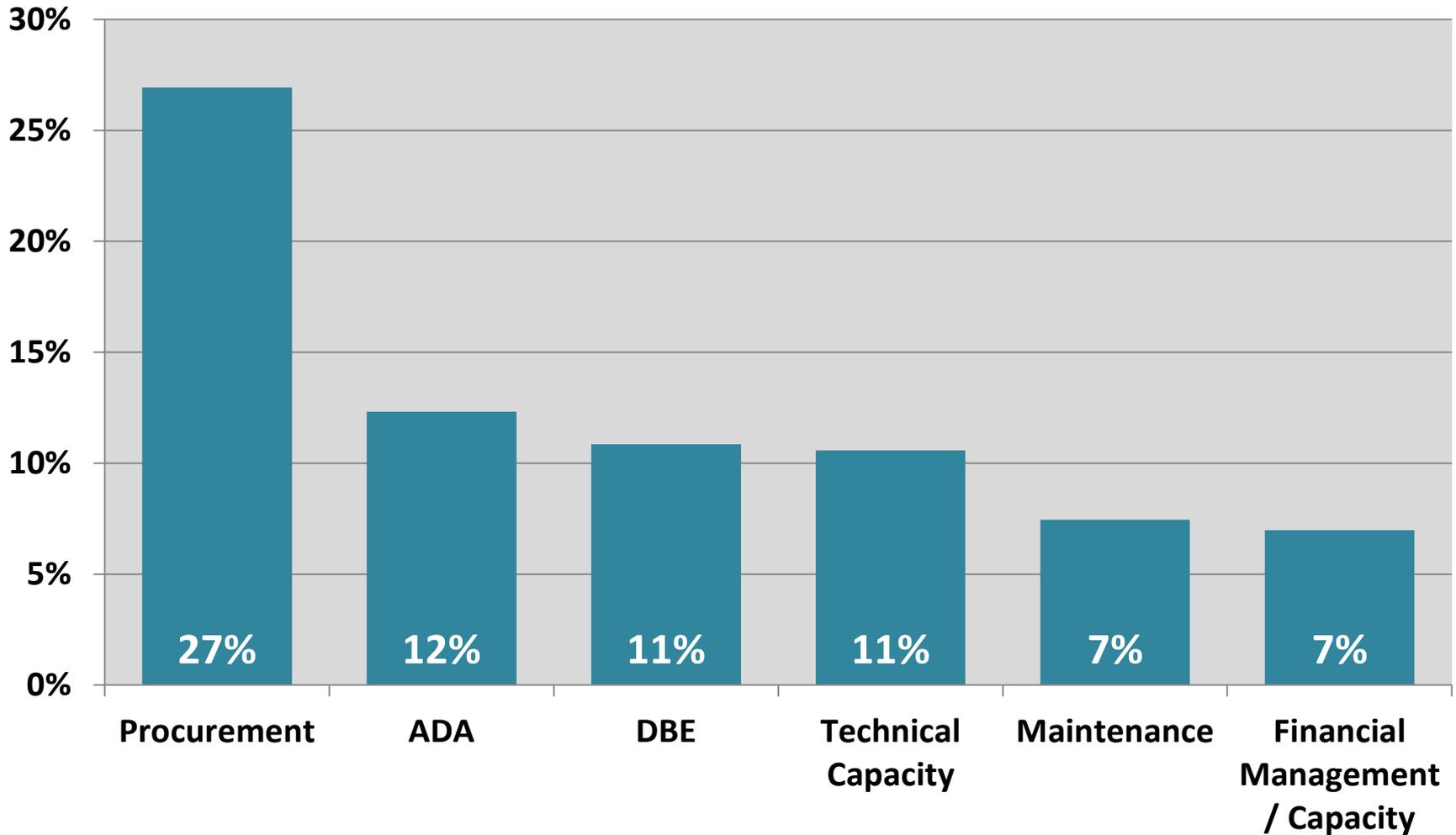
- Purpose: Provide additional opportunities for grantees to learn about and understand FTA's oversight review process
- Formats:
 - Webinars & recorded presentations
 - Case study videos
 - Training modules, self-assessments, and quizzes
 - Fact sheets/one-pagers
 - Toolbox of compliant practices/examples
- General Topic Areas:
 - Review preparation
 - Narrow-focused compliance issues

Current Status

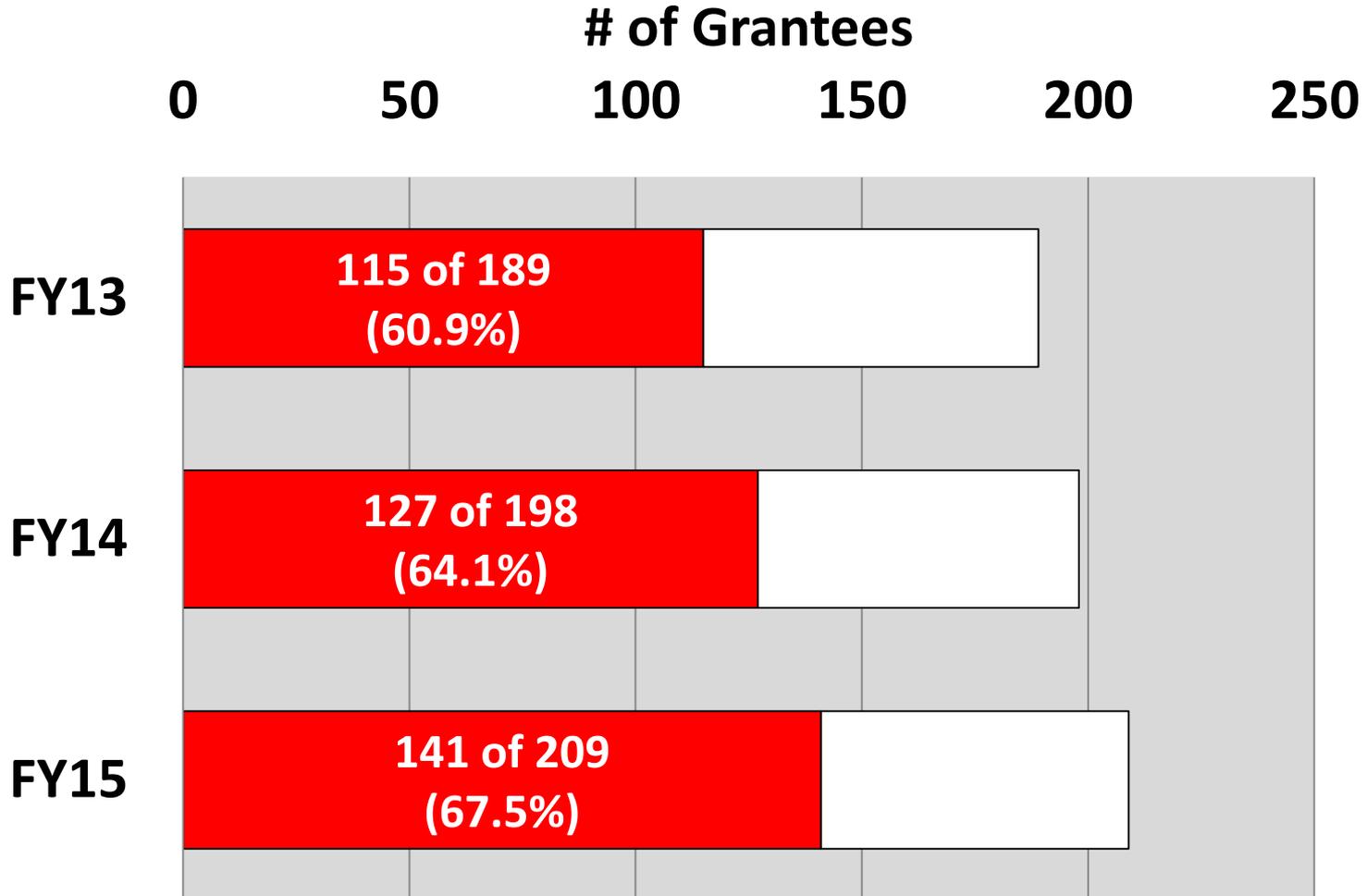
- Launched first Triennial Review webinar in 2015.
 - Covered all compliance areas in the TR
 - Viewed by over 500 people at grantees around the country
 - Positive feedback from industry
- New Triennial Review webinars – Fall 2016
- New State Management Review webinars – Fall 2016

2013-2015 Triennial Review

Top 6 Finding Areas by Percentage of All Findings

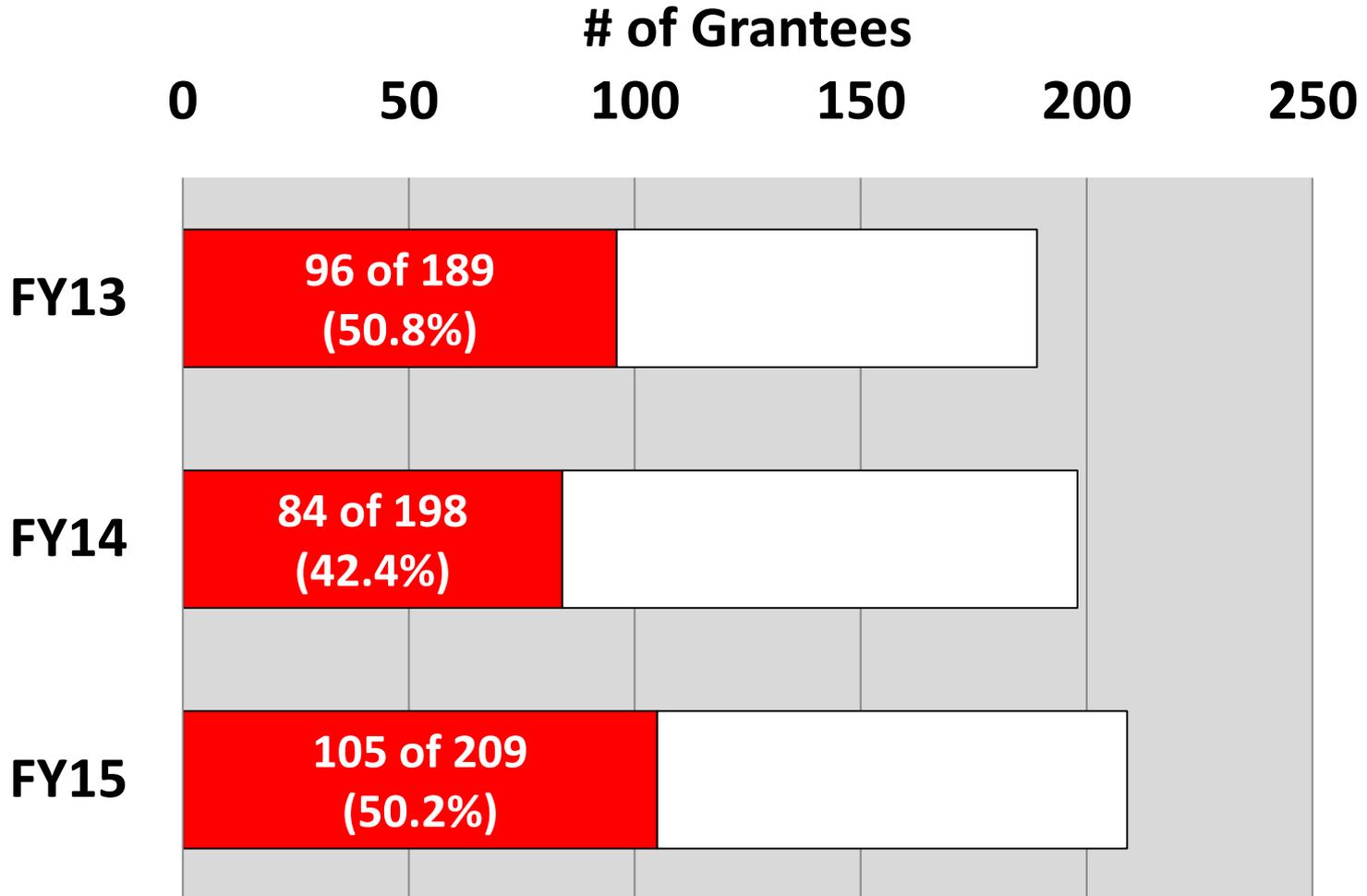


Number of Grantees with at Least One Triennial Review Area Finding by Federal Fiscal Year of Review - *Procurement*



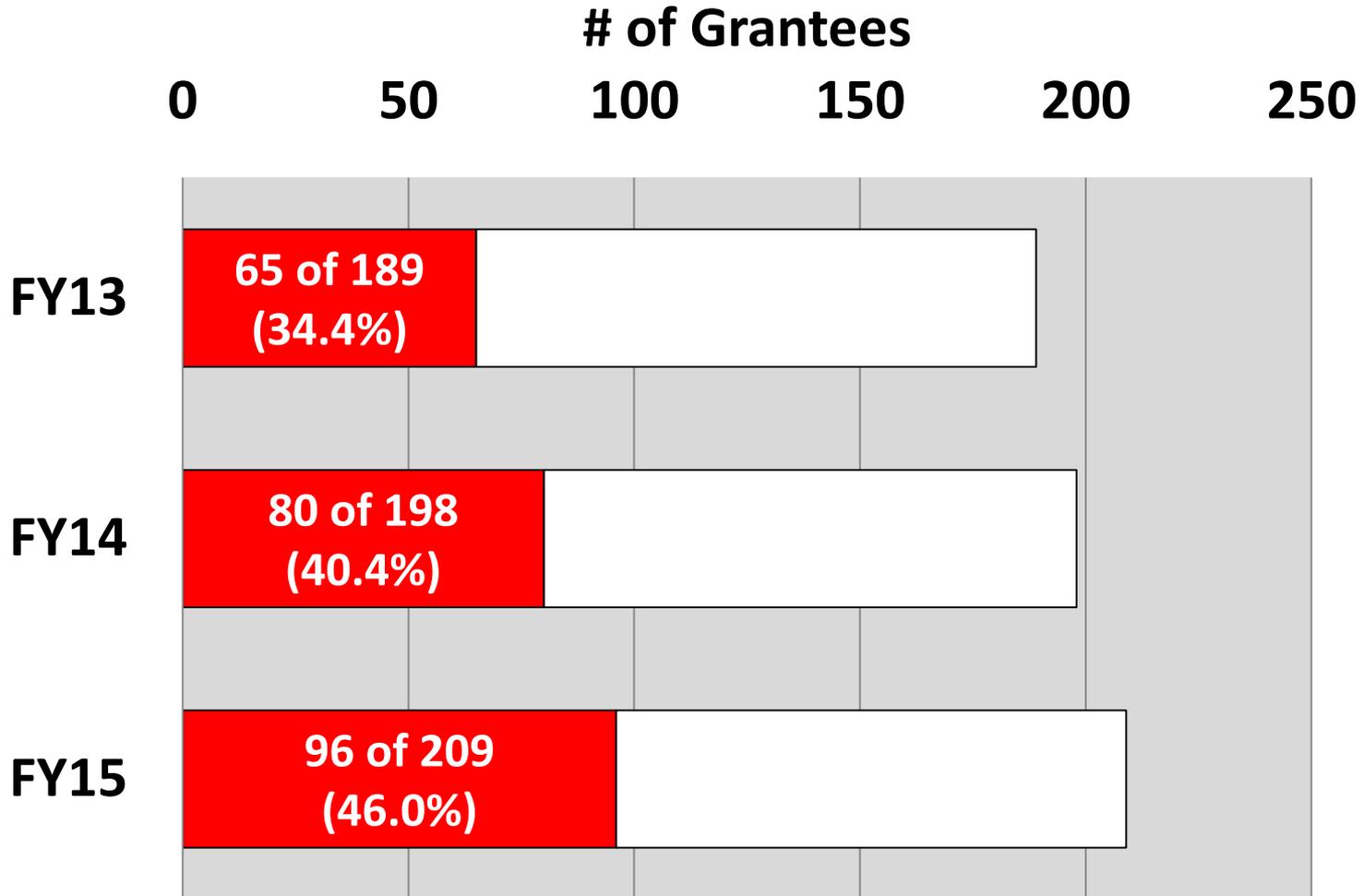
100 of 151 (66%) completed FY16 reviews have at least 1 procurement finding.

Number of Grantees with at Least One Triennial Review Area Finding by Federal Fiscal Year of Review - ADA



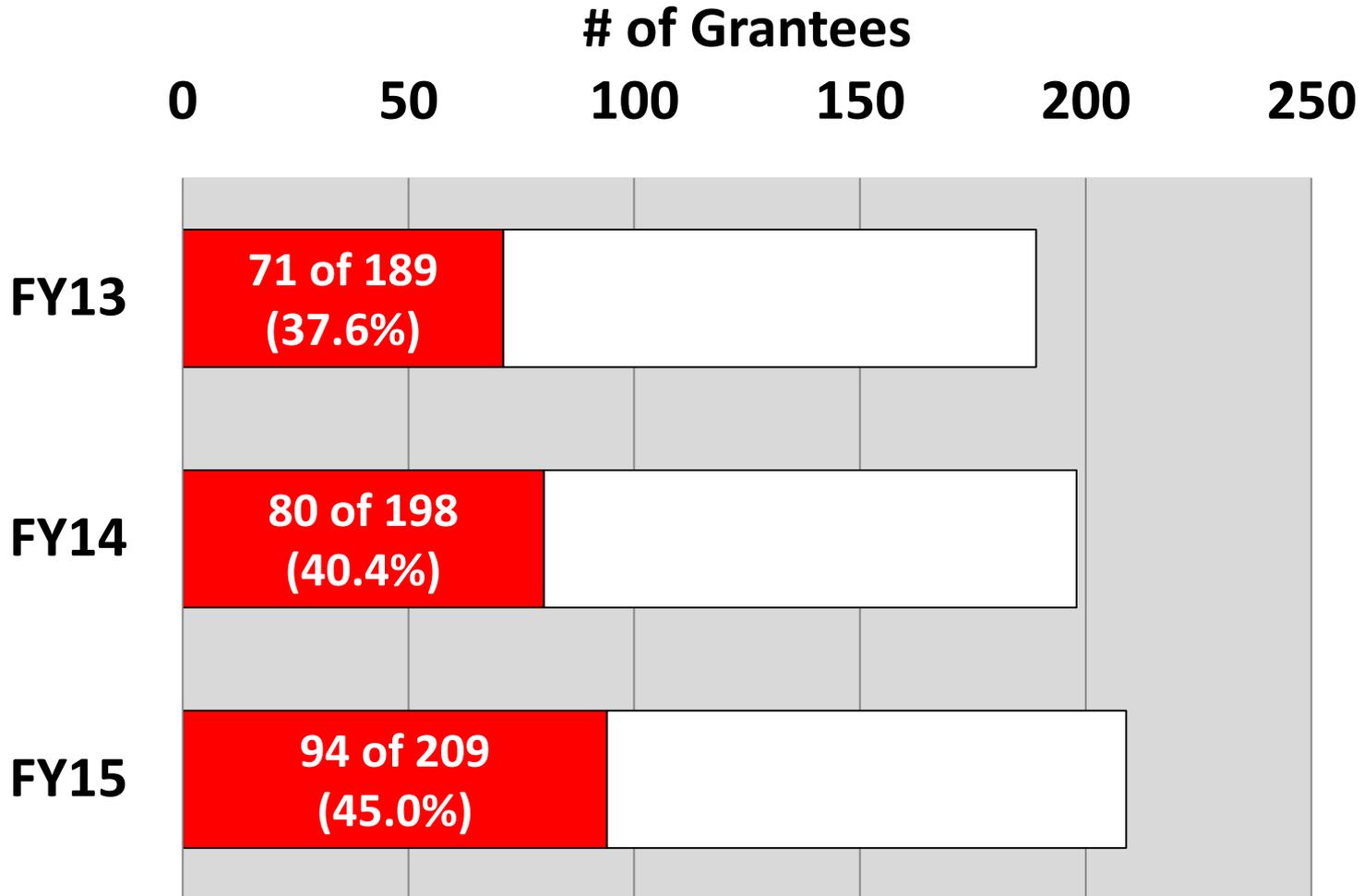
98 of 151 (65%) completed FY16 reviews have at least 1 ADA finding.

Number of Grantees with at Least One Triennial Review Area Finding by Federal Fiscal Year of Review - DBE



87 of 151 (58%) completed FY16 reviews have at least 1 DBE finding.

Number of Grantees with at Least One Triennial Review Area Finding by Federal Fiscal Year of Review – *Technical Capacity*



2013-2015 Triennial Review Top 5 Findings

Top 5 Findings Nationwide	Area	Frequency
Lacking independent cost estimate	Procurement	1 in 4 reviews
No verification that excluded parties are not participating	Procurement	1 in 4 reviews
Lacking required cost/price analysis	Procurement	1 in 4 reviews
Insufficient no-show policy	ADA	1 in 5 reviews
No FTA clauses	Procurement	1 in 5 reviews

Early Look at 2016* Triennial Review Top 5 Findings

Top 5 Findings Nationwide	Area	Frequency
DBE goal achievement analysis not completed or not submitted	DBE	1 in 5 reviews
Insufficient no-show policy	ADA	1 in 5 reviews
DBE uniform reports not submitted semi-annually	DBE	1 in 5 reviews
Lacking required cost/price analysis	Procurement	1 in 6 reviews
Limits or capacity constraints on ADA Complementary Paratransit service	ADA	1 in 6 reviews

*151 of 201 reviews completed.

Early Look at 2016* Triennial Review

Top 3 Procurement Findings

Top 3 Findings Nationwide	Common/Example Corrective Action(s)
Lacking required cost/price analysis	<ul style="list-style-type: none"> -Submit updated procedures -Submit proof of analysis for next procurement
Lacking independent cost estimate	<ul style="list-style-type: none"> -Submit updated procedures -Submit proof of independent cost estimate for next procurement
No verification that excluded parties are not participating	<ul style="list-style-type: none"> -Submit updated procedures for searching SAM.gov and documenting results

*151 of 201 reviews completed.

Early Look at 2016* Triennial Review

Top 3 ADA Findings

Top 3 Findings Nationwide	Common/Example Corrective Action(s)
Insufficient no-show policy	-Revise no-show policy to only suspend riders who have established a pattern or practice of missing scheduled trips
Limits or capacity constraints on ADA Complementary Paratransit service	-Submit procedures for monitoring ADA complementary paratransit service for capacity constraints such as excessively long trips and the scheduling systems for making reservations
Insufficient ADA complaint process	-Develop and implement a process for receiving, tracking, reviewing, and resolving complaints

Early Look at 2016* Triennial Review

Top 3 DBE Findings

Top 3 Findings Nationwide	Common/Example Corrective Action(s)
DBE goal achievement analysis not completed or not submitted	<ul style="list-style-type: none"> -Submit the missing shortfall analyses with a corrective action plan -Submit updated procedures
DBE uniform reports not submitted semi-annually	<ul style="list-style-type: none"> -Submit missing report(s) -Submit updated procedures
DBE uniform reports do not include required information	<ul style="list-style-type: none"> -Submit corrected report -Submit updated procedures

*151 of 201 reviews completed.

Early Look at 2016* Triennial Review

Top 3 Technical Capacity Findings

Top 3 Findings Nationwide	Common/Example Corrective Action(s)
Incorrect FFR reporting	<ul style="list-style-type: none"> -Submit corrected reports -Submit updated procedures
Inadequate oversight of subrecipient/third party contractor/lessees	<ul style="list-style-type: none"> -Submit procedures and staffing plan to monitor subrecipient/contractor
Progress reports lack required information	<ul style="list-style-type: none"> -Next quarterly report must include all required info -Submit updated procedures

Early Look at 2016* Triennial Review

Top 3 Maintenance Findings

Top 3 Findings Nationwide	Common/Example Corrective Action(s)
Facility/equipment maintenance plan lacking or inadequate	-Submit a revised facility maintenance program that includes all FTA-funded assets and security items, as well as routine inspections on a timely basis (daily, weekly, monthly, quarterly, and annually, etc.)
Late vehicle preventive maintenance	-Submit procedures for completing preventive maintenance inspections on time -Submit a monthly report signed by senior management demonstrating at least 80 % on time PMI for 3 consecutive months
Vehicle maintenance plan incomplete or out of date	-Submit updated vehicle maintenance plan including missing elements

Early Look at 2016* Triennial Review

Top 3 Financial Management/Capacity Findings

Top 3 Findings Nationwide	Common/Example Corrective Action(s)
No existing financial plan	-Develop and submit a multi-year financial plan
ECHO documentation deficient	<ul style="list-style-type: none"> -Submit to the FTA regional office procedures for adequately documenting ECHO draws -Submit supporting documentation for ECHO draws
Excess cash problems	<ul style="list-style-type: none"> -Submit procedures for disbursing FTA funds within 3 business days -Report on the number of days by which funds were disbursed, until further notice -Reimburse interest to the Federal Treasury

Group Discussion Questions

- What are the greatest compliance training needs at your agency?
- Who are the people that most need this training?
- What is the best way to reach these people?
 - Training format, duration, delivery, etc.
- What are some of the challenges we need to be aware of?

Group Discussion Questions

- What are some of the specific questions and issues we should address/answer in these trainings?
- What is the best way for us to get your feedback on the specific trainings and ideas for future trainings?