

FINAL REPORT

FISCAL YEAR 2023 TRIENNIAL REVIEW

of the

**Greater Portland Transit District
(GPTD)
Portland, Maine
ID: 1348**

Performed for:

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

Prepared By:

**Advanced Systems Technology & Management, Inc.
under subcontract to Qi Tech, LLC**

Scoping Meeting Dates: February 24 & 27, 2023

Virtual Site Visit Entrance Conference Date: March 28, 2023

Virtual Site Visit Exit Conference Date: May 9, 2023

Final Report Date: July 11, 2023

Table of Contents

I.	Executive Summary	1
II.	Review Background and Process	2
1.	Background.....	2
2.	Process	2
3.	Metrics.....	3
III.	Recipient Description	4
1.	Organization	4
2.	Award and Project Activity.....	4
IV.	Results of the Review	6
1.	Legal	6
2.	Financial Management and Capacity	6
3.	Technical Capacity – Award Management	6
4.	Technical Capacity – Program Management & Subrecipient Oversight	6
5.	Technical Capacity – Project Management.....	7
6.	Transit Asset Management.....	7
7.	Satisfactory Continuing Control.....	7
8.	Maintenance	7
9.	Procurement.....	7
10.	Disadvantaged Business Enterprise (DBE)	8
11.	Title VI.....	8
12.	Americans with Disabilities Act (ADA) – General.....	9
13.	ADA – Complementary Paratransit.....	10
14.	Equal Employment Opportunity.....	10
15.	School Bus.....	10
16.	Charter Bus	11
17.	Drug Free Workplace Act.....	11
18.	Drug and Alcohol Program	11
19.	Section 5307 Program Requirements.....	11
20.	Section 5310 Program Requirements.....	12
21.	Section 5311 Program Requirements.....	12
22.	Public Transportation Agency Safety Plan (PTASP).....	12
23.	Cybersecurity.....	12
V.	Summary of Findings.....	13
VI.	Attendees.....	15
VII.	Appendices	16

I. Executive Summary

This report documents the Federal Transit Administration's (FTA) Triennial Review of the Greater Portland Transit District (GPTD) of Portland, ME. The 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 Advanced Systems Technology & Management, Inc. under subcontract to Qi Tech, LLC. During the virtual site visit, the reviewer discussed the administrative and statutory requirements and reviewed recipient documents.

Due to the Coronavirus 2019 (COVID-19) Public Health Emergency, the FTA conducted a virtual site visit for this Triennial Review. In addition, the FTA expanded the review to address GPTD's compliance with the administrative relief and flexibilities that the FTA granted, and the requirements of the COVID-19 Relief funds received through the Coronavirus Aid, Relief, and Economic Security (CARES) Act, Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA) of 2021, and the American Rescue Plan (ARP) Act of 2021. The FTA also requested the GPTD share if and/or how it suspended, deviated from, or significantly updated or altered its transit program due to the public health emergency.

The FY2023 Triennial Review focused on GPTD's compliance in 23 areas. Deficiencies related to the COVID-19 Relief funds have been clearly identified as part of the deficiency description in the respective review area. There were no repeat deficiencies from the FY 2019 Triennial Review.

Deficiencies were found in the areas listed below.

Review Area	Deficiencies	
	Code	Description
Procurement	P11-1	Missing FTA clauses
Disadvantaged Business Enterprise	DBE5-1	DBE uniform reports contain inaccuracies and/or are missing required information
Title VI	TVI4-1	Title VI complaint process not implemented in accordance with Title VI Program

Subsequent to the site visit, the GPTD provided corrective action responses to address the deficiencies noted in the Procurement and Disadvantaged Business Enterprise areas of this report. As a result, these deficiencies are closed.

II. Review Background and Process

1. Background

The Triennial Review includes a review of the recipient's compliance in 23 areas. The basic requirements for each of these areas are summarized in Section IV. The 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 in 2019; 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 Region 1 office or the recipient's office.

2. Process

The Triennial Review includes a pre-review assessment, a desk review and scoping meetings with the FTA regional office, and a site visit to the recipient's location. Due to the COVID-19 Public Health Emergency, a virtual site visit was conducted of each recipient. In addition, the review was expanded to address the recipient's compliance with the administrative relief and flexibilities FTA granted and the requirements of the COVID-19 relief funds received through the CARES Act, CRRSAA of 2021, and the ARP Act of 2021. The FTA also requested that the recipient share if and/or how it suspended, deviated from, or significantly updated or altered its transit program due to the public health emergency.

The fiscal year (FY) 2023 process began with the regional office transmitting a notification of the review and a Recipient Information Request (RIR) to the recipient on November 23, 2022, indicating a review would be conducted. While the recipient prepared its response to the RIR, the regional office and review team conducted the scoping meeting on February 24 and 27, 2023. Regional office staff provided electronic files as necessary to the reviewers who also accessed recipient information in the FTA electronic award management (TrAMS) and oversight (OTrak) systems. Following the desk review and scoping meeting, the reviewer and the recipient corresponded and exchanged information and documentation in preparation for the virtual site visit. Prior to the virtual site visit, the reviewer sent to the recipient on April 3, 2023, an agenda package indicating the issues that would be discussed, records to be reviewed, and interviews to be conducted.

The virtual site visit portion of the review began with an entrance conference on March 28, 2023, at which the reviewer and regional staff discussed the purpose of the Triennial Review and the review process. The reviewer conducted additional interviews and reviewed documentation to evidence the recipient's compliance with FTA requirements.

The operations/management contractor, Regional Transportation Program, Inc., was reviewed virtually to provide an overview of activities related to the FTA-funded project. The reviewer also examined a sample of procurement files during this review.

Upon completion of the virtual site visit, the reviewer and the FTA regional office staff provided a summary of preliminary findings to the recipient at the exit conference on May 9, 2023. Section VI of this report lists the individuals participating in the site visit.

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

GPTD is a quasi-municipal organization that is chartered in accordance with Maine State Statutes. GPTD is a standalone agency governed by a Board of Directors that represent the municipalities it serves. The service area includes the municipalities of Brunswick, Falmouth, Freeport, Gorham, Portland, South Portland, Westbrook, and Yarmouth with a combined population of approximately 204,000 persons.

GPTD directly operates a network of nine local fixed-routes and one express bus route Monday through Friday from 5:10 a.m. to 11:45 p.m., Saturdays from 6:00 a.m. to 11:45 p.m., and Sundays from 7:45 a.m. to 7:45 p.m. Complementary paratransit service is provided under contract with the Regional Transportation Program, Inc. (RTP), a private, non-profit agency. ADA complementary paratransit service is provided during the same hours and service areas as the GPTD fixed-route service.

The regular, full one-way fare for local bus routes is \$2.00 and \$4.00 for express service. Half fares are offered at all times to senior citizens, persons with disabilities, and passengers who hold a Medicare card. GPTD offers various multi-ride tickets and passes. The fare for ADA paratransit service is \$2.50 per one-way trip.

GPTD operates 44 FTA-funded transit buses in fixed-route service. Its bus fleet consists of 35- and 40-foot low floor transit coaches. GPTD operates from its operations and maintenance facility located at 114 Valley Street and from a downtown transportation center located at 17 Elm Street. Both facilities are FTA-funded. RTP operates out of its own facility at 1 Ledgeview Drive in Westbrook, Maine.

2. Award and Project Activity

Below is a list of the Greater Portland Transit District's open awards at the time of the review.

Award Number	Award Amount	Year Executed	Description
ME-2019-013	\$1,245,000	2019	GPTD Battery Electric Bus Project
ME-2020-010	\$8,398,713	2021	Greater Portland Transit District Section 5307 CARES ACT Operating and Planning
ME-2020-025	\$4,656,052	2021	2020 Operating Asst. and Capital Program Grant
ME-2017-008	\$5,309,844	2017	2017 Operating Asst. and Capital Program Grant
ME-2021-016	\$3,796,528	2021	2021 Operating Asst. and Capital Program Grant
ME-2019-010	\$6,026,080	2019	2019 Operating Asst. and Capital Program Grant
ME-2022-011	\$5,114,800	2022	2022 Operating and Capital Grant

Award Number	Award Amount	Year Executed	Description
ME-2017-007	\$173,840	2017	GPTD Northern Service Expansion - Capital Grant Phase 2
ME-2016-017	\$875,398	2016	Regional Bus Shelter-Sign Project
ME-2016-016	\$5,247,318	2016	2016 Operating and Capital Grant

GPTD received Supplemental Cares Act funding for operating assistance in award number ME-2020-010. This is not GPTD's first time receiving operating assistance from the FTA.

Projects Completed

In the past few years, GPTD completed the following noteworthy projects:

- Replaced some of the bus fleet
- Procured electric buses and charging equipment
- Purchased bus shelters
- Completed several facility renovations.

Ongoing Projects

GPTD is currently implementing the following noteworthy projects:

- Continuing to replace the bus fleet
- Installing ADA accessibility improvements at bus stops
- Implementing regional bus system recommendations, including improvements to frequencies and hours, making route alignments, and adding a microtransit pilot project
- Implementing transit signal priority.

Future Projects

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

- Purchase property in support of operations-maintenance facility reconstruction/expansion
- Reconstruct and expand the operations-maintenance facility
- Expand service including implementation of a bus rapid transit project connecting the municipalities of Portland, Westbrook, and Gorham.

IV. Results of the Review

1. Legal

Basic Requirement: The recipient must promptly notify the 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: During this Triennial Review of GPTD, 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 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: During this Triennial Review of GPTD, 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 Federal Transit Administration (FTA) and close awards timely.

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

4. Technical Capacity - Program Management & Subrecipient Oversight

Basic Requirement: 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 Sections 5310, 5311, and 5339 funds must develop and submit a State Management/Program Management Plan to the FTA for approval. Recipients must enter into an agreement with each subrecipient, obtain required certifications from subrecipients, 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 GPTD, no deficiencies were found with the FTA requirements for Technical Capacity – Program Management & Subrecipient Oversight.

5. Technical Capacity – Project Management

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

Finding: During this Triennial Review of GPTD, 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 GPTD, 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 GPTD, 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 Americans with Disabilities Act (ADA) accessibility features on all vehicles, equipment, and facilities in good operating order.

Finding: During this Triennial Review of GPTD, 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, the FTA does not require each State DOT to have policies and procedures separate from the state education department.

Finding: During this Triennial Review of GPTD, a deficiency was found with the FTA requirements for Procurement.

Deficiency Description:

Missing FTA clauses (P11-1)

In one of GPTD's reviewed procurements, the purchase of New Flyer buses, the required clause regarding the prohibition of certain telecommunications and video surveillance services or equipment was missing. This clause, as found in 2 CFR 200.216, went into effect on August 13, 2020. GPTD awarded the contract for the vehicles on March 31, 2022, so the clause should have been included in the contract.

Corrective Actions and Schedule: For the deficiency *Missing FTA clauses (P11-1)*, by November 30, 2023, GPTD must submit to the FTA regional office revised procurement procedures that address inclusion of all FTA-required third-party contract clauses through use of a clause checklist or other mechanism. For GPTD's next procurement, it must submit to the FTA regional office documentation that the required process was implemented.

Subsequent to the site visit, GPTD provided documentation of a revised clause checklist to ensure that future procurements include all FTA-required third-party contract clauses. GPTD also provided with their June 20, 2023 response to the draft report, documentation of using the new procurement checklist in a Request to Initiate Procurement Process for a service vehicle dated June 14, 2023. This action was deemed acceptable by the FTA regional office to close this finding on June 26, 2023.

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 USDOT-assisted contracts.

Finding: During this Triennial Review of GPTD, a deficiency was found with the US DOT requirements for DBE.

Deficiency Description:

DBE uniform reports contain inaccuracies and/or are missing required information (DBE5-1)
GPTD included in its semi-annual DBE Uniform Reports revenue contract funds generated and retained by a DBE advertising firm. GPTD maintained a revenue contract with the advertising firm, which sold advertising space on GPTD's buses to third-party advertisers. The advertisers paid the advertising firm and based on a revenue-sharing agreement with GPTD, the advertising firm kept its portion of the revenue generated (30%) from the sale of advertising space and passed through to GPTD its portion of the revenue. During the site visit, GPTD stated it reported the portion of revenue kept by the advertising company as an award and payment to a DBE firm in its semi-annual DBE Uniform Reports. The FTA Regional Civil Rights Officer (RCRO) explained that revenue contracts cannot be counted as awards or payments toward DBE attainment.

Corrective Actions and Schedule: For the deficiency *DBE uniform reports contain inaccuracies and/or missing requirement information (DB5-1)* by November 30, 2023 GPTD must submit to the FTA Office of Civil Rights corrected reports for 2020, 2021, and 2022, along with implemented procedures for correctly completing Uniform Reports of DBE Awards or Commitments and Payments.

By November 30, 2023, GPTD must also develop a DBE goal that includes a description of the revised methodology used to establish the new goal, upload it to TrAMS, and notify the FTA Office of Civil Rights once completed.

Subsequent to the site visit, GPTD submitted the corrected DBE Uniform Reports in TrAMS along with procedures for correctly completing Uniform Reports and a DBE goal that included the revised methodology. These actions were deemed acceptable by the FTA Office of Civil Rights to close this finding on June 28, 2023.

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 GPTD, a deficiency was found with the FTA requirements for Title VI.

Deficiency Description:

Title VI complaint process not implemented in accordance with Title VI Program (TVI4-1)
The Title VI regulations at 49 CFR Section 21.9(b), Requirement to Develop Title VI Complaint Procedures and Complaint Form, require that all recipients shall develop procedures for investigating and tracking Title VI complaints filed against them. During the review, GPTD provided a Title VI Log of Investigations, Lawsuits, and Complaints that included four complaints received in 2022 that had not been resolved. GPTD's Title VI Plan states in part: "If the complaint is deemed to have investigative merit: A complete investigation will be conducted, and an investigative report will be completed within sixty (60) days from receipt of the complaint." GPTD acknowledged that these four complaints were not handled and resolved in accordance with the timeframes outlined in its Title VI program requirements.

Corrective Actions and Schedule: For the deficiency *Title VI complaint process not implemented in accordance with Title VI Program (TVI4-1)*, by December 31, 2023, GPTD must prepare and submit to the FTA Office of Civil Rights evidence that it processes complaints as detailed in its Title VI Program.

By August 31, 2023, GPTD must also submit a revised Title VI Program to correctly describe how it processes complaints.

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: During this Triennial Review of GPTD, 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 GPTD, no deficiencies were found with the 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.

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

16. Charter Bus

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

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

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 (POP).

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 an individual presenting a Medicare card during off peak hours will not be more than one half the peak hour fares.

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

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 title to the leased vehicles.

This section only applies to recipients that receive Section 5310 funds directly from FTA; therefore, the related requirements are not applicable to the Triennial Review of GPTD.

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.

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

22. Public Transportation Agency Safety Plan (PTASP)

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).

Finding: During this Triennial Review of GPTD, no deficiencies were found with the FTA requirements for PTASP Requirements.

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), a new subsection added by the National Defense Authorization Act for Fiscal Year 2020, Pub. L. 116-92, § 7613 (Dec. 20, 2019).

Finding: During this Triennial Review of GPTD, no deficiencies were found with the FTA requirements for Cybersecurity Requirements.

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	D	P11-1: Missing FTA clauses	GPTD must submit to the FTA regional office revised procurement procedures that address inclusion of all FTA-required third-party contract clauses through use of a clause checklist or other mechanism. For GPTD's next procurement, it must submit to the FTA regional office documentation that the required process was implemented.		May 9, 2023 June 26, 2023
10. Disadvantaged Business Enterprise	D	DBE5-1: DBE uniform reports contain inaccuracies and/or are missing required information	GPTD must submit to the FTA Office of Civil Rights corrected reports for 2020, 2021, and 2022, along with implemented procedures for correctly completing Uniform Reports of DBE Awards or Commitments and Payments. GPTD must also develop a DBE goal that includes a description of the revised methodology used to establish the new goal, upload it to TrAMS, and notify the FTA Office of Civil Rights once complete.		June 28, 2023 June 28, 2023

Review Area	Finding	Deficiency Code(s)	Corrective Action(s)	Response Due Date(s)	Date Closed
11. Title VI	D	TVI4-1: Title VI complaint process not implemented in accordance with Title VI Program	GPTD must prepare and submit to the FTA Office of Civil Rights evidence that it processes complaints as detailed in its Title VI Program. GPTD must also submit a revised Title VI Program to correctly describe how it processes complaints.	December 31, 2023 August 31, 2023	
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 Act	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				
22. Public Transportation Agency Safety Plan	ND				
23. Cybersecurity	ND				

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>Greater Portland Transit District</i>			
Greg Jordan	Executive Director	207-517-3025	gjordan@gpmetro.org
Glenn Fenton	Chief Transportation Officer	207-517-3029	gfenton@gpmetro.org
Shelly Brooks	Chief Financial Officer	207-221-8710	sbrooks@gpmetro.org
Mike Tremblay	Director of Transit Development	207-517-3023	mtremblay@gpmetro.org
<i>Regional Transportation Program, Inc.</i>			
Jack DeBerardinis	Executive Director	207-615-0093	jackd@rtprides.org
Cindy Gilson	Manager of Finance & Administration	207-615-0094	cgilson@rtprides.org
Danielle Beesley	HR Manager	207-615-0393	dbeesley@rtprides.org
Josh Bradford	IT & Reporting Coordinator	207-615-0392	jbradford@rtprides.org
<i>FTA</i>			
Peter Butler	Regional Administrator	617-494-2729	peter.butler@dot.gov
Peggy Griffin	Regional Civil Rights Officer	617-494-2397	margaret.griffin@dot.gov
Alex Hammond	General Engineer	617-494-2304	alexander.hammond@dot.gov
Bert Pechhold	General Engineer	617-494-4914	bert.pechhold@dot.gov
Syed Ahmed	General Engineer	617-494-3254	syed.ahmed@dot.gov
<i>AdSTM, Inc.</i>			
Keith Carlson	Reviewer	608-780-8141	keith.carlson@adstm.com

VII. Appendices

Civil Rights Corrective Action Procedures:

Please submit corrective actions for all Civil Rights deficiencies to the following email address and copy your FTA Region I Program Manager:

FTACivilRightsSupport@dot.gov

1. A separate email should be sent to address each deficiency separately with attached supporting documentation.
2. Email Subject Line: FY 23 CORTAP Review Corrective Actions – Findings Code – Recipient Name/Acronym + TrAMS ID

Example: FY23 CORTAP Review Corrective Actions – DBE5-1 – Greater Portland Transit District/GPTD #1348

3. The body of the email should contain a short summary of the corrective action.
4. Supporting documents should be sent as PDF files. Do not send MS Word or Excel spreadsheets.