

FINAL REPORT

**FISCAL YEAR 2023
TRIENNIAL REVIEW**

of

**Androscoggin Valley Council of Governments
(AVCOG)
Auburn, Maine
ID: 1344**

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 Date: February 24 & 27, 2023
Virtual Site Visit Entrance Conference Date: March 28, 2023
Virtual Site Visit Exit Conference Date: July 12, 2023
Final Report Date: September 13, 2023**

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I. Executive Summary

This report documents the Federal Transit Administration's (FTA) Triennial Review of the Androscoggin Valley Council of Governments (AVCOG) of Auburn, Maine. 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 AVCOG'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 AVCOG share if and/or how it suspended, deviated from, or significantly updated or altered its transit program due to the public health emergency.

The FY 2023 Triennial Review focused on AVCOG'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 two repeat deficiencies from the FY 2019 Triennial Review in the following areas: Americans with Disabilities Act (ADA) - General, and ADA - Complementary Paratransit.

Deficiencies were found in the areas listed below.

Review Area	Deficiencies	
	Code	Description
Maintenance	M2-2	Late facility/equipment preventive maintenance
Americans With Disabilities Act (ADA) - General	ADA-GEN13-1*	Insufficient oversight of contracted service for ADA requirements
ADA – Complementary Paratransit	ADA-CPT7-1*	Insufficient oversight of contractors/other private entities providing ADA complementary paratransit

* Denotes repeat deficiency

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 meeting 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 May 22, 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.

A Section 5307 operations/management contractor, Western Maine Transportation Services, Inc. (WMTS), was reviewed virtually to provide an overview of activities related to the FTA-funded projects. 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 July 12, 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

The governing body of AVCOG is the Executive Committee, which is made up of representatives from AVCOG member towns. The representatives are selected by each town. AVCOG's Executive Committee is currently comprised of 18 members representing 16 communities. The Lewiston-Auburn Transit Committee (LATC) is a quasi-municipal agency providing a public bus system, Citylink, serving the Lewiston-Auburn area. It was established in 1976 by an interlocal agreement between the city of Lewiston and the city of Auburn. The committee is comprised of three members from Lewiston, three from Auburn, and one at-large member that alternates from each city on a three-year cycle. It is staffed by AVCOG. LATC contracts with a transit operator, Western Maine Transportation Services, Inc. (WMTS), for the operation and maintenance of its public transportation system. The population of its service area is approximately 60,700.

LATC provides the buses, radios, fareboxes, bus stop signs, and shelters and is responsible for overseeing system marketing, setting fares, planning and scheduling, and most other policy matters. Citylink provides fixed-route and ADA complementary paratransit services. Service is operated under a three-year contract with WMTS. The contractor provides vehicles, operations, vehicle maintenance, and customer service functions. Service is provided weekdays from 6:00 a.m. to 6:00 p.m. and Saturdays from 9:00 a.m. to 5:00 p.m. There is no Sunday service. The one-way fare for fixed-route service is \$1.50, with \$0.75 charged to seniors, the disabled, and Medicare cardholders. The fare for ADA complementary paratransit service is \$3.00.

Citylink fixed-route service is provided with nine FTA-funded 29- and 35-foot buses. Complimentary paratransit vehicles are provided by the contractor. Service is a hub and spoke system originating from two FTA-funded transfer centers located in the Lewiston and Auburn downtown areas.

2. Award and Project Activity

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

Award Number	Award Amount	Year Executed	Description
ME-2022-005	\$894,915	2022	Androscoggin Valley Council of Governments (AVCOG) FY 2021 Operating, Capital, and Planning Assistance
ME-2023-005	\$1,150,119	2023	Androscoggin Valley Council of Governments (AVCOG) FY 2022 Operating, Capital, and Planning Assistance

AVCOG received Supplemental Funds for operating assistance in award numbers ME-2022-014, ME-2022-015, and ME-2020-009. This is not AVCOG's first time receiving operating assistance from the FTA.

Projects Completed

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

- Purchased replacement buses in 2019 and 2022.

Future Projects

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

- Modifying service area and methods in line with recommendations from the 2021 Transit Study.
- Removing some fixed-route areas and adding demand-response to those geographic areas affected.

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 AVCOG, 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 AVCOG, 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 AVCOG, 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.

This section only applies to recipients that have subrecipients; therefore, the related requirements are not applicable to the Triennial Review of AVCOG.

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 AVCOG, 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 AVCOG, 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 AVCOG, 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 AVCOG, a deficiency was found with the FTA requirements for Maintenance.

Deficiency Description:

Late facility/equipment preventive maintenance (M2-2)

During the examination of the preventive maintenance (PM) records for AVCOG's facility components, it was discovered that the PMs for the bus stations in Lewiston and Auburn were not being completed semi-annually and annually, as required in AVCOG's facility maintenance plan. The Transit Program Manager stated that the monthly inspections and semi-annual HVAC/Plumbing inspections were carried out. However, as a result of staffing vacancies, the agency was never able to implement the full (semi-annual and annual) facility inspections. Per FTA C. 5010.1E Ch. IV 4(n)(4), recipients must follow manufacturers' recommendations for PM inspections for all FTA-funded assets. FTA has directed reviewers to cite a deficiency when PM inspections are less than 80 percent on time.

Corrective Actions and Schedule: For the deficiency *Late facility/equipment preventive maintenance (M2-2)*, by October 31, 2023, AVCOG must submit to the FTA regional office procedures for completing facility and equipment preventive maintenance inspections on time.

By January 31, 2024, AVCOG must submit an annual report signed by the chief executive officer or other senior management designee on the preventive maintenance results of the annual bus station inspections in Lewiston and Auburn. AVCOG must include with the submittal to the FTA regional office:

- A report listing the dates the inspections are due and the dates of the actual inspections. List the percentage of the inspections performed on time.
- Back-up documentation (e.g., copy of a work order, printout from the maintenance management system) documenting the date of the inspection.

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 AVCOG, 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 USDOT-assisted contracts.

Finding: During this Triennial Review of AVCOG, 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 AVCOG, 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 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 AVCOG, a deficiency was found with the US DOT requirements for ADA – General.

Deficiency Description:

Insufficient oversight of contracted service for ADA requirements (ADA-GEN13-1)

Per 49 CFR 39.23, recipients that contract with private entities to operate service must ensure the private entity is meeting the ADA service requirements. The AVCOG does not have an implemented oversight process in place to monitor their current contractor, WMTS, to ensure they are complying with the required ADA service provisions. This was a deficiency in the FY 2019 Triennial Review and AVCOG developed an ADA Fixed Route Contractor Monitoring Checklist, but as a result of the Public Health Emergency and resulting staffing vacancies, the agency was never able to implement the oversight program.

Corrective Action and Schedule: For the deficiency *Insufficient oversight of contracted service for ADA requirements (ADA-GEN13-1)*, by October 31, 2023, AVCOG must submit to the FTA Office of Civil Rights (FTA TCR) procedures for ensuring that their contractors comply with the ADA service provisions, along with evidence of implementation.

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 AVCOG, a deficiency was found with the US DOT requirements for ADA – Complementary Paratransit.

Deficiency Description:

Insufficient oversight of contractors/other private entities providing ADA complementary paratransit (ADA-CPT7-1)

Per 49 CFR 39.23, recipients that contract with private entities to operate service must ensure the private entity is meeting the ADA service requirements. The AVCOG does not have an implemented oversight process in place to monitor their current contractor, WMTS, to ensure

they are complying with the required ADA Complementary Paratransit service provisions. This was a deficiency in the FY 2019 Triennial Review and AVCOG developed a capacity constraint monitoring spreadsheet, but as a result of the Public Health Emergency and resulting staffing vacancies, the agency was never able to implement the service oversight program.

Corrective Action and Schedule: For the deficiency *Insufficient oversight of contractors/other private entities providing ADA complementary paratransit (ADA-CPT7-1)*, by October 31, 2023, AVCOG must submit to the FTA TCR procedures for ensuring that service provided on its behalf by contractors or other providers complies with the ADA service provisions and evidence of implementation. At a minimum, the review process must include documentation of monitoring the eligibility process, service provisions, no show policy, and capacity constraints.

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 AVCOG, 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 AVCOG, 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 AVCOG, 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 AVCOG, 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 AVCOG, 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 AVCOG, 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 AVCOG.

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 AVCOG.

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 AVCOG, 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).

This section only applies to recipients that operate rail fixed guideway public transportation systems; therefore, the related requirements are not applicable to the Triennial Review of AVCOG.

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	NA				
5. Technical Capacity – Project Management	ND				
6. Transit Asset Management	ND				
7. Satisfactory Continuing Control	ND				
8. Maintenance	D	M2-2: Late facility/ equipment preventive maintenance	<p>AVCOG must submit to the FTA regional office procedures for completing facility and equipment preventive maintenance inspections on time.</p> <p>AVCOG must submit an annual report signed by the chief executive officer or other senior management designee on the preventive maintenance results of the annual bus station inspections in Lewiston and Auburn. AVCOG must include with the submittal to the FTA regional office:</p> <ul style="list-style-type: none"> A report listing the dates the inspections are due and the dates of the actual inspections. List the percentage of the inspections performed on time. Back-up documentation (e.g., copy of a work order, printout from the maintenance management system) documenting the date of the inspection. 	<p>October 31, 2023</p> <p>January 31, 2024</p>	
9. Procurement	ND				
10. Disadvantaged Business Enterprise	ND				
11. Title VI	ND				

Review Area	Finding	Deficiency Code(s)	Corrective Action(s)	Response Due Date(s)	Date Closed
12. Americans with Disabilities Act (ADA) - General	D	ADA-GEN13-1*: Insufficient oversight of contracted service for ADA requirements	AVCOG must submit to the FTA Office of Civil Rights (FTA TCR) procedures for ensuring that their contractors comply with the ADA service provisions, along with evidence of implementation.	October 31, 2023	
13. ADA – Complementary Paratransit	D	ADA-CPT7-1*: Insufficient oversight of contractors/other private entities providing ADA complementary paratransit	AVCOG must submit to the FTA TCR procedures for ensuring that service provided on its behalf by contractors or other providers complies with the ADA service provisions and evidence of implementation. At a minimum, the review process must include documentation of monitoring the eligibility process, service provisions, no show policy, and capacity constraints.	October 31, 2023	
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	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)

* Denotes repeat deficiency

VI. Attendees

Name	Title	Phone Number	E-mail Address
<i>AVCOG</i>			
Amy Landry	Executive Director	207-513-6564	alandry@avcog.org
Larry Allen	Transit Program Manager	207-783-9186	larry.allen@avcog.org
Kim Bustamante	Finance Director	207-783-9186	kbustamante@avcog.org
<i>Western Maine Transportation Services, Inc.</i>			
Sandy Buchanan	Executive Director	207-330-3324	sbuchanan@westernmainetrans.org
<i>FTA</i>			
Peter Butler	Regional Administrator	617-494-2729	peter.butler@dot.gov
Michelle Muhlander	Deputy Regional Administrator	617-494-2630	michelle.muhlander@dot.gov
Nicholas Sun	Division Chief, Civil Rights Oversight	312-705-1267	nicholas.sun@dot.gov
Matt Keamy	Program Management and Oversight Director	617-494-3038	matthew.keamy@dot.gov
Alex Hammond	General Engineer	617-494-2304	alexander.hammond@dot.gov
Bert Pechhold	General Engineer	617-494-4914	bert.pechhold@dot.gov
Nathaniel Fowler	Program Analyst	202-366-3232	nathaniel.fowler@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 – ADA-GEN13-1 – Androscoggin Valley Council of Governments/AVCOG #1344

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.