

## **FINAL REPORT**

### **FISCAL YEAR 2023 TRIENNIAL REVIEW**

**of**

**Greater New Haven Transit District  
(GNHTD)  
Hamden, Connecticut  
ID: 1337**

*Performed for:*

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

*Prepared By:*

**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 25, 2023**

**Final Report Date: August 15, 2023**

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## I. Executive Summary

This report documents the Federal Transit Administration's (FTA) Triennial Review of the Greater New Haven Transit District (GNHTD) of Hamden, Connecticut. 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 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 GNHTD'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 GNHTD 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 GNHTD'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.

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

## **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 reviewer 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 2, 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.

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 25, 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**

Greater New Haven Transit District (GNHTD) is a municipal corporation established in 1973 under the provisions of Connecticut Public Act 261, Chapter 103(a) for the purpose of operating and providing a variety of transportation programs and services. It is one of 11 transit districts in the State of Connecticut. Member towns include Bethany, Branford, East Haven, Hamden, New Haven, North Branford, North Haven, Orange, West Haven, and Woodbridge. The population of the GNHTD's service area is approximately 863,700, which encompasses 197 square miles.

GNHTD is governed by a Board of Directors consisting of 17 Board members. The Board is composed of representatives of member municipalities appointed by their Chief Elected Official and approved by the legislative bodies of each municipality. Each Board member has a vote proportional to the population of their member community. The Board of Directors has policy-making authority and convenes four times a year.

The Board of Directors has delegated program administration to an Executive Committee consisting of seven Board members elected by the Board of Directors as prescribed by the By-Laws of the GNHTD. The Executive Committee meets four times a year and has administrative control of all phases of program operations.

GNHTD operates various demand-response services; it does not operate fixed-route services. The primary service is the Americans with Disabilities Act (ADA) complementary paratransit for Connecticut Transit (*CTtransit*), the statewide bus service operated by the Connecticut Department of Transportation. Operating the service within three-quarters of a mile of the fixed route, GNHTD serves all or parts of 20 communities. ADA complementary paratransit service is provided during all hours that *CTtransit* fixed-route bus service is available: seven days per week from 5:00 a.m. to 1:30 a.m.

A fleet of 86 federally funded paratransit vehicles provide GNHTD's transit service. The fare is \$3.50 per one-way trip, twice the cost of *CTtransit*'s fixed-route fare. Children under 4 and Personal Care Attendants ride free. GNHTD has one federally funded facility in Hamden, CT that houses its bus garage and administrative offices.

GNHTD also provides a state and locally funded Regional Rides Program. The specifics regarding service delivery are determined by a committee consisting of representatives from each participating municipality. Eligible riders include residents of the municipality who are 60 years of age or older and/or have a disability.

## **2. Award and Project Activity**

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

Award Number	Award Amount	Year Executed	Description
CT-2016-011-00	\$2,499,440	2016	Capital Assistance 2016
CT-2016-011-00	\$5,360,000	2017	New Facility - ROW and Design
CT-2016-011-00	\$1,901,200	2018	Capital Assistance 2018
CT-2016-011-00	\$1,772,000	2019	Capital Assistance 2019
CT-2016-011-00	\$2,700,000	2021	GNHTD CARES Act
CT-2016-011-00	\$1,480,000	2020	2020 Capital Assistance
CT-2016-011-00	\$600,000	2022	GNHTD-ARP

GNHTD received Supplemental Funds for operating assistance in award numbers CT-2016-011-00 and CT-2016-011-00. This is GNHTD's first time receiving operating assistance from the FTA.

### **Projects Completed**

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

- Vehicle purchases. Accomplished the successful procurement of new paratransit vehicles and two pilot Ford Transit Wagon vehicles.

### **Ongoing Projects**

GNHTD is currently implementing the following noteworthy projects:

- Facility rehabilitation. Completing the rehabilitation of the Sherman Avenue facility is a multiyear project that is entering the final stages. Remaining expenses for this project include, but are not limited to, finishing touches such as carpet, modular furniture, and facility/office related equipment.

### **Future Projects**

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

- Operating projects. In addition to funding ongoing operation activities, GNHTD plans to carry out the following operating expense projects: Establish a facility maintenance team; and enter into cooperative procurement for fleet fuel needs, possibly with CTtransit.
- Capital projects. GNHTD plans to seek proposals to purchase electric vehicles, charging stations, and related equipment.

## **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 GNHTD, 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 GNHTD, 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 GNHTD, 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 GNHTD.

## **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 GNHTD, 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 GNHTD, 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 GNHTD, 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 GNHTD, 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 GNHTD, 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 GNHTD, 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 GNHTD, 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 GNHTD, 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 GNHTD, 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.

**Finding:** During this Triennial Review of GNHTD, 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 GNHTD, 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 GNHTD, 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 GNHTD, 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 GNHTD, 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 GNHTD, 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 GNHTD.

## 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 GNHTD.

## **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 GNHTD, 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 GNHTD.

## 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	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 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)

## VI. Attendees

Name	Title	Phone Number	E-mail Address
<b><i>Greater New Haven Transit District</i></b>			
Mario Marrero	Executive Director	203-281-2525	mmarrero@gnhtd.org
Aida Lopez	Chief Compliance Officer	203-281-2550	alopez@gnhtd.org
Anthony Bethune	Operations Manager	203-281-2509	abethune@gnhtd.org
Andre Welsh	Director of Risk Management	203-281-2514	awelsh@gnhtd.org
Glen McGough	Chief Administrative Officer	203-281-2523	gmcgough@gnhtd.org
Jennifer Brown	Human Resources Manager	203-281-2513	jbrown@gnhtd.org
Christine Hey	Manager of Grants & Procurement	203-281-2505	chey@gnhtd.org
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Kenya Simmons	Mobility & Outreach Coordinator	203-281-2518	ksimmons@gnhtd.org
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<b><i>FTA</i></b>			
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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
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## VII. Appendices