

Federal Transit Administration

Fiscal Year 2022

Triennial Review Closeout Letter

**Research Triangle Regional Public
Transportation Authority
(GoTriangle)**



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

REGION IV
Alabama, Florida, Georgia,
Kentucky, Mississippi,
North Carolina, Puerto
Rico, South Carolina,
Tennessee, Virgin Islands

230 Peachtree St., N.W.,
Suite 1400
Atlanta, GA 30303
404-865-5600
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June 2, 2023

Mr. Charles Lattuca
President/CEO
Research Triangle Regional Public Transportation Authority (GoTriangle)
4600 Emperor Rd
Durham, NC 27709

Re: Federal Transit Administration Fiscal Year 2022 Triennial Review Closeout

Dear Mr. Lattuca:

The Federal Transit Administration (FTA) has completed its review of the GoTriangle's responses, and related documentation, to findings presented in the FTA Final Triennial Review Report dated June 27, 2022. The corrective actions that have been taken satisfactorily resolve the findings identified in the June 2022 FTA Final Report. GoTriangle's Triennial Review is now considered closed. No further response is necessary.

Thank you for the assistance and cooperation provided by you and your staff. David Powell is available at (404) 865-5628, David.Powell@dot.gov to assist you further if you have any questions.

Sincerely,

Yvetho Merisme
06/02/2023

Yvetho Merisme
Acting Director, Office of Financial Management and Program Oversight

cc: Deirdre Walker, Sr Manager of Administration, GoTriangle
David Powell P.E., General Engineer, FTA Region IV

Federal Transit Administration

Fiscal Year 2022 Triennial Review

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(GoTriangle)**



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June 27, 2022

Mr. Sig Hutchinson
Chair, Board of Trustees
Research Triangle Regional Public Transportation Authority (GoTriangle)
4600 Emperor Blvd
Durham, NC 27709

Re: Federal Transit Administration (FTA) Fiscal Year 2022 Triennial Review - Final Report

Dear Mr. Hutchinson:

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

Due to the Coronavirus 2019 (COVID-19) Public Health Emergency, a virtual site visit was conducted for this Triennial Review. In addition, the review was expanded to address GoTriangle's compliance with the administrative relief and flexibilities 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 Triennial Review focused on GoTriangle's compliance in 23 areas. No deficiencies were found with the FTA requirements in 13 areas. Deficiencies were found in six areas: Financial Management and Capacity, Technical Capacity – Award Management, Satisfactory Continuing Control, Disadvantaged Business Enterprise (DBE), Americans with Disabilities Act (ADA) - General, and ADA – Complementary Paratransit. Four areas were not applicable. GoTriangle had no repeat deficiencies from the Fiscal Year 2018 Triennial Review.

Regulations and Guidance

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

Cybersecurity Certification for Rail Rolling Stock and Operations

In FY2020, the National Defense Authorization Act for Fiscal Year 2020, Pub. L. 116-92, §7613 promulgated the addition of U.S.C. Section 5323(v). This new requirement instructs recipients that operate rail fixed guideway public transportation systems to certify to FTA that it established a process to develop, maintain, and execute a written plan for identifying and reducing cybersecurity risks. Recipients are to use the approach described in the voluntary standards and best practices developed by the National Institute of Standards and Technology (NIST) and the Secretary of Homeland Security in consultation and coordination with various stakeholders. Recipients are to also identify hardware and software it determines should be tested and analyzed by a third party to mitigate cybersecurity risk

For the FY2022 review cycle, FTA is deploying a “soft launch” in determining, if and how, recipients are developing their plan for identifying and reducing cybersecurity risks. Recipients are to certify in TrAMS by correctly completing Category 20 of the Annual Certifications and Assurances to indicate their compliance with this requirement. For the FY2025 review cycle, this requirement will be reviewed for full compliance.

For additional information about the cybersecurity framework, visit the NIST’s website at: <https://www.nist.gov/cyberframework/framework>.

Thank you for your cooperation and assistance during this Triennial Review. If you need any technical assistance or have any questions, please do not hesitate to contact Mr. David Powell, General Engineer, at 404-865-5628 or by email at david.powell@dot.gov.

Sincerely,



Yvette G. Taylor, Ph.D.
Regional Administrator

Enclosure

cc: Charles Lattuca, President and CEO, GoTriangle
Deirdre Walker, Sr Manager of Administration, GoTriangle
David Powell, General Engineer, FTA Region IV
Michele D. Foster, Regional Civil Rights Officer, FTA Region IV
Tashu Trivedi, Technical Project Manager, TFC Consulting, Inc.
Philip Sherer, Lead Reviewer, TFC Consulting, Inc.

FINAL REPORT

**FISCAL YEAR 2022
TRIENNIAL REVIEW
of**

**Research Triangle Regional Public Transportation Authority
GoTriangle
Durham, NC
ID: 5527**

Performed for:

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

Prepared By:

TFC Consulting, Inc.

**Scoping Meeting Date: March 8-10, 2022
Site Visit Date: April 18-21, 2022
Draft Report Date: June 27, 2022**

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I. Executive Summary

This report documents the Federal Transit Administration's (FTA) Triennial Review of the Research Triangle Regional Public Transportation Authority, (GoTriangle) of Durham, NC. 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 TFC Consulting, Inc. During the site visit, administrative and statutory requirements were discussed and documents were reviewed.

Due to the Coronavirus 2019 (COVID-19) Public Health Emergency, a virtual site visit was conducted for this Triennial Review. In addition, the review was expanded to address GoTriangle's compliance with the administrative relief and flexibilities 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. GoTriangle was also requested to share if and/or how it suspended, deviated from, or significantly updated or altered its transit program due to the public health emergency.

The Triennial Review focused on GoTriangle'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.

Deficiencies were found in the areas listed below.

Review Area	Deficiencies	
	Code	Description
2. Financial Management and Capacity (F)	F1-1	Lacking/missing required written financial management policies and procedures
3. Technical Capacity – Award Management (TC-AM)	TC-AM2-1	Incorrect FFR reporting
7. Satisfactory Continuing Control (SCC)	SCC8-4	No evidence of physical inventory or reconciliation
10. Disadvantaged Business Enterprise (DBE)	DBE5-1	DBE uniform reports contain inaccuracies and/or are missing required information
12. Americans with Disabilities Act (ADA) – General (ADA-GEN)	ADA-GEN8-4	Weight/size limitations on wheelchairs

Review Area	Deficiencies	
	Code	Description
13. ADA – Complementary Paratransit (ADA-CPT)	ADA-CPT2-3	Eligibility appeals process not properly implemented
	ADA-CPT4-4	Paratransit fare deficiency

Subsequent to the site visit, GoTriangle provided corrective action responses to address the deficiencies noted in the Americans with Disabilities Act (ADA) - General and ADA Complementary Paratransit areas of this report. The deficiencies in these areas, as noted in the above table, are closed.

II. Review Background and Process

1. Background

The United States Code, Chapter 53 of Title 49 (49 U.S.C. 5307(f)(2)) requires that “At least once every 3 years, the Secretary shall review and evaluate completely the performance of a recipient in carrying out the recipient’s program, specifically referring to compliance with statutory and administrative requirements...” This Triennial Review was performed in accordance with the FTA procedures (published in FTA Order 9010.1B, April 5, 1993).

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.

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

2. Process

The Triennial Review 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. Recipients were also requested to 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) 2022 process began with the regional office transmitting, a recipient information request (RIR) to GoTriangle on November 29, 2021, indicating a review would be conducted. While GoTriangle prepared its response to the RIR, the regional office and review team conducted a desk review and scoping meeting on March 8-10, 2022. Necessary files retained by the regional office were sent to the reviewers electronically. Following the desk review and scoping meeting, the reviewers and the recipient corresponded and exchanged information and documentation in preparation for the virtual site visit. As a result of this review, an agenda package indicating the issues that would be discussed, records to be reviewed, and interviews to be conducted was then sent to GoTriangle on March 24, 2022. The site visit to GoTriangle occurred on April 18-21, 2022.

The site visit portion of the review began with an entrance conference, at which the purpose of the Triennial Review and the review process were discussed. The reviewers conducted additional interviews and reviewed documentation to evidence GoTriangle’s compliance with FTA requirements.

Upon completion of the site visit, the FTA and the reviewers provided a summary of preliminary findings to GoTriangle at an exit conference. 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 Research Triangle Regional Public Transportation Authority, which does business as GoTriangle, is a public transportation provider chartered by the Secretary of State of North Carolina in 1989 as a regional public transportation authority, known then as Triangle Transit Authority, serving Wake, Durham, and Orange Counties. GoTriangle's services include regional bus and shuttle service, paratransit, rideshare matching, trip planning, and transportation demand management. GoTriangle directly operates the majority of its fixed route bus and paratransit service. It contracts with other local transit providers, Go Raleigh, Go Cary, Go Durham, Chapel Hill Transit, and Duke Transit, when it is advantageous to have those systems operate some regional services more efficiently and effectively than GoTriangle. The service area includes the cities of Apex, Cary, Chapel Hill, Durham, Garner, Hillsborough, Knightdale, RDU International Airport, Raleigh, the Research Triangle Park, Wendell, Wake Forest, and Zebulon. The area serviced by GoTriangle exceeds 1.5 million in population.

GoTriangle operates fixed routes and ADA paratransit service, known as ACCESS:

Operating Hours		
	22 Fixed Route	ACCESS
Monday - Friday	04:55 – 23:45	04:55 – 23:45
Saturday	05:55 – 23:45	05:55 – 23:45
Sunday	05:55 – 21:45	05:55 – 21:45

The base fixed route fare is \$2.25, paratransit \$4.50, and \$3.00 for express routes. GoTriangle offers a discount fare to Medicare cardholders and individuals with disabilities. Seniors over 65, youths 12 and under, and those aged 13 -18 years with a Youth GoPass are fare-free.

GoTriangle has a fleet of 78 fixed route vehicles, including 15 in the contingency fleet. Due to COVID-19 and driver capacity the current peak service requires 37 buses. Prior to service reductions in March 2020 there were 61 vehicles in maximum service. GoTriangle's fleet is also comprised of 25 FTA-funded paratransit vehicles.

GoTriangle's main facility locations and functions are:

Facilities	
Function	Location
Headquarters/ Administration Offices	4600 Emperor Blvd., Durham, NC
Maintenance	5201 Nelson Rd, Morrisville, NC
Regional Transit Center	601 Slater Road, Durham, NC

2. Award and Project Activity

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

Award Number	Award Amount	Year Executed	Description
NC-2020-053-00	\$4,484,785	2020	Multi-Sourced FFY18 and FFY19 Urbanized Area Formula, CMAQ for Ops and Electric Buses-GoTriangle; Raleigh-Durham, NC
NC-2017-064-00	\$3,187,686	2017	GoTriangle's FY 2017 Section 5307 Program of Projects
NC-2016-027-00	\$2,588,511	2016	GoTriangle's FY 2016 Section 5307 Program of Projects
NC-2020-037-00	\$20,000,000	2020	FY 2018 BUILD Raleigh Union Station (RUS) Bus, Phase II; GO Triangle; Raleigh NC
NC-2019-012-00	\$180,800	2019	FY 2015-FY 2016 STBGP-LAPP Capital Projects-Amenities; GO Triangle, Raleigh, NC

GoTriangle received Supplemental Funds for operating assistance in award number NC-2020-049-00. This is not GoTriangle's first time receiving operating assistance from the FTA.

Projects Completed

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

- Completed the feasibility study for improving or relocating the Regional Transit Center, identifying a strategy for relocating the facility to a new site.

Ongoing Projects

GoTriangle is currently implementing the following noteworthy projects:

- Raleigh Union Station Bus Facility (RUS Bus) Project construction. RUS Bus is a \$37 million transit project with a \$200 million plus residential/commercial overbuild. GoTriangle has received a USDOT Better Utilizing Investments to Leverage Development (BUILD) grant to help fund this project.
- Development phase of the Greater Triangle Commuter Rail Project. This project will cost approximately \$2 billion and take eight to ten years to design and construct.
- The relocation of the GoTriangle Regional Transit Center (RTC). The RTC is the primary hub for GoTriangle regional bus services connecting Wake, Durham, and Orange Counties.

Future Projects

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

- Expansion of the Bus Operations and Maintenance Facility.

- Lead a regional transit/housing/land use study and engage with partners to provide better bus service throughout the region.

IV. Results of the Review

1. Legal

Basic Requirement: The recipient must promptly notify the FTA of legal matters and additionally notify the U.S. Department of Transportation (US DOT) Office of Inspector General (OIG) of any instances relating to false claims under the False Claims Act or fraud. Recipients must comply with restrictions on lobbying requirements.

Finding: During this Triennial Review of GoTriangle, 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 GoTriangle, one deficiency was found with the FTA requirements for Financial Management and Capacity.

The table below provides more details about the ECHO drawdowns reviewed.

Award Number	Financial Purpose Code	Transaction Date	Drawdown Amount	Deficiencies
NC-2016-008-01-00	2	31-Jul-2018	\$243,707	None
NC-2016-027-01-00	0	28-May-2019	\$35,756	
NC-2017-047-01-00	0	03-Jun-2019	\$14,864	
NC-2020-053-08-00	0	17-Nov-2020	\$215,430	
NC-2020-053-06-00	0	17-Nov-2020	\$324,390	
NC-2020-053-03-00	4	17-Nov-2020	\$2,246,028	
NC-2020-049-01-00	4	17-Nov-2020	\$7,872,802	
NC-2020-037-01-00	0	02-Feb-2021	\$172,410	
NC-2021-010-01-00	4	02-Aug-2021	\$28,800	

Award Number	Financial Purpose Code	Transaction Date	Drawdown Amount	Deficiencies
NC-2020-053-05-00	2	02-Aug-2021	\$684,000	

Deficiency Description:

F1-1: Lacking/missing required written financial management policies and procedures

Recipients' financial procedures must include coverage of allowable costs in accordance with 2 CFR Part 200 Subpart E and cash management and payment in accordance with 2 CFR 200.305 Payment. GoTriangle's Financial Management Policies and Procedures include coverage of cash management and a brief reference to allowable costs, however, this document is in draft form. An extract from a separate document, Financial Policies and Procedures Manual, Chapter 8 Grant Management also references allowable costs, but does not provide detailed procedures for determining allowability of costs.

2 CFR Part 200.302 Financial management

The financial management system of each non-Federal entity must provide for the following:

(4) Effective control over, and accountability for, all funds, property, and other assets. The non-Federal entity must adequately safeguard all assets and assure that they are used solely for authorized purposes.

(6) Written procedures to implement the requirements of §200.305 Payment.

(7) Written procedures for determining the allowability of costs in accordance with Subpart E—Cost Principles of this part and the terms and conditions of the Federal award.

2 CFR Part 200.305 Payment

(b) For non-Federal entities other than states, payment methods must minimize the time elapsing between the transfer of funds from the United States Treasury or the pass-through entity and the disbursement by the non-Federal entity whether the payment is made by electronic funds transfer, or issuance or redemption of checks, warrants, or payment by other means. See also §200.302 Financial management paragraph (b)(6). Except as noted elsewhere in this part, Federal agencies must require recipients to use only OMB-approved standard government wide information collection requests to request payment.

2 CFR Part 200.403 Factors affecting allowability of costs

Except where otherwise authorized by statute, costs must meet the following general criteria in order to be allowable under Federal awards:

- (a) *Be necessary and reasonable for the performance of the Federal award and be allocable thereto under these principles.*
- (b) *Conform to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items.*
- (c) *Be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the non-Federal entity.*
- (d) *Be accorded consistent treatment. A cost may not be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the Federal award as an indirect cost.*
- (e) *Be determined in accordance with generally accepted accounting principles (GAAP), except, for state and local governments and Indian tribes only, as otherwise provided for in this part.*
- (f) *Not be included as a cost or used to meet cost sharing or matching requirements of any other federally-financed program in either the current or a prior period. See also §200.306 Cost sharing or matching paragraph (b).*
- (g) *Be adequately documented. See also §§200.300 Statutory and national policy requirements through 200.309 Period of performance of this part.*
- (h) *Cost must be incurred during the approved budget period. The Federal awarding agency is authorized, at its discretion, to waive prior written approvals to carry forward unobligated balances to subsequent budget periods pursuant to §200.308(e)(3).*

Corrective Action and Schedule: By August 29, 2022, GoTriangle must submit to the FTA regional office:

- An updated and finalized Financial Management Policies and Procedures or other implemented document that includes procedures for determining allowability of cost and timely distribution of funds.
- Documentation showing that GoTriangle has trained appropriate staff on the new policies and procedures.

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 GoTriangle, one deficiency was found with the FTA requirements for Technical Capacity – Award Management.

Deficiency Description:

TC-AM2-1: Incorrect FFR reporting

Recipients are required to provide a current, complete, and accurate financial picture of each award through the submission of Federal Financial Reports (FFRs). Two FFRs were sampled: NC-2017-064 Quarter 4 2021 and NC-2020-037 Quarter 1 2022. FTA provided review remarks on the NC-2017-064 Quarter 4 2021 report identifying that the federal cash section did not match the TrAMS drawdown records.

The NC-2020-037 award is for a USDOT BUILD funded project. GoTriangle is required to submit a quarterly report to the Office of the Secretary of Transportation (OST) including a FFR (SF-425). This data should match the information submitted in the FFR on TrAMS. FTA provided review comments on the Quarter 1 2022 FFR for NC-2020-037 noting that the expenditures listed did not match the OST report for the same period and the federal cash receipts and disbursements did not match TrAMS disbursement records. The OST report for Quarter 2 2022 included inconsistencies in expenditure reporting between the Budget and Expenditure Table (Attachment B) and FFR/SF-425 (Attachment C). At the time of the review the FTA FFR for Quarter 2 was not due in TrAMS and had not yet been submitted, so this could not be compared to the most recent OST report.

The spreadsheets used by GoTriangle to develop the FTA FFRs allow expenditures to be tracked, but do not clearly identify the expenses that were included in drawdowns during the period. This creates the potential for error in reporting the cash receipt and disbursement lines of the FFR, as noted in the above reports. The OST and FTA FFRs are developed for the same period, but submitted at slightly different times by different GoTriangle departments. The recipient should develop stronger tracking and coordination across project and finance teams to help the accuracy of reporting.

2 CFR 200.328 Financial reporting

Unless otherwise approved by OMB, the Federal awarding agency may solicit only the standard, OMB-approved government wide data elements for collection of financial information (at time of publication the Federal Financial Report or such future collections as may be approved by OMB and listed on the OMB Web site). This information must be collected with the frequency required by the terms and conditions of the Federal award, but no less frequently than annually nor more frequently than quarterly except in unusual circumstances, for example where more frequent reporting is necessary for the effective monitoring of the Federal award or could significantly affect program outcomes, and preferably in coordination with performance reporting.

FTA Circular 5010.1E, Chapter. III, Section 3. Reporting Requirements

a. Federal Financial Report (FFR). FTA's electronic FFR report is consistent with and includes information identified in OMB's Standard Form FFR (SF FFR). A recipient must submit an FFR for each active Award. The FFR accompanies the MPR (described below) and is used to monitor the federal assistance awarded. The purpose of the FFR is to provide a current, complete, and accurate financial picture of the Award. This report is submitted electronically through TrAMS. The first 4 items (A-D) are prepared using cash accounting. The remaining report items (E-U) must be prepared on the accrual basis of accounting; that is, income is recorded when earned instead of when received, and expenses are recorded when incurred instead of when paid. These items, (E-U) of the FFR, may not be prepared on the cash basis of accounting, even though a recipient may keep its books on the cash basis during its accounting year. If this is the case, at the submission of the FFR, the recipient must prepare the necessary accruals and submit the FFR on the accrual basis of accounting. (See Appendix B, "Federal Financial Report").

The FFR must contain the following elements:

- (1) All financial facts (e.g., expenditures and obligations) relating to the Award (scope of work and supporting activities); the purpose of each financial report and applicable reporting period should be completely and clearly displayed in the reports.*
- (2) Reported financial data should be accurate to the last Award Budget (this may be the initial Award, or last revision to the Award Budget or amendment to the Award) and the reporting period. The requirement for accuracy does not rule out inclusion of reasonable estimates when precise measurement is impractical, uneconomical, unnecessary, or conducive to delay. Financial data reported may reconcile data included in the prior report, and must be explained in the explanation/remarks section of the report.*
- (3) Financial reports must be based on the required supporting documentation maintained in the recipient's official financial management system that produces information that objectively discloses financial aspects of events or transactions.*
- (4) Financial data reported should be derived from accounts that are maintained on a consistent, periodic basis; material changes in accounting policies or methods and their effect must be clearly explained.*
- (5) Reporting terminology used in financial reports to FTA should be consistent with receipt and expense classifications included in the latest Award.*
- (6) The recipient is responsible for indicating whether or not it is charging indirect costs to the Award at the time of application. If the recipient is charging indirect costs to the Award, the recipient is responsible for having an approved Indirect Cost Rate Proposal or Cost Allocation Plan approved by the cognizant agency on file, and uploading the documentation into their TrAMS "Recipient Profile." The recipient must report on related indirect expenditures.*
- (7) The recipient must provide financial information related to the FFR categories: Federal Cash, Recipient Share, Unliquidated Obligations, and Program Income.*

Corrective Action and Schedule: By August 29, 2022, GoTriangle must submit to the FTA regional office:

- Revised reports for NC-2020-037 that include the missing/corrected information and address FTA comments.
- Procedures for including all required information in future FFR reports, including improved tracking, communication of data between departments, and ensuring that the OST and FTA FFRs are consistent.

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.

During this Triennial Review of GoTriangle, the FTA requirements for Technical Capacity – Program Management & Subrecipient Oversight were not applicable.

5. Technical Capacity – Project Management

Basic Requirement: The recipient must be able to implement the Federal Transit Administration (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 GoTriangle, 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 GoTriangle, no deficiencies were found with the FTA requirements for Transit Asset Management.

7. Satisfactory Continuing Control

Basic Requirement: The recipient must ensure that Federal Transit Administration (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 GoTriangle, one deficiency was found with the FTA requirements for Satisfactory and Continuing Control.

Deficiency Description:

SCC8-4: No evidence of physical inventory or reconciliation

A non-state recipient must conduct and reconcile a physical inventory of FTA-funded equipment at least every two years. Equipment means an article of nonexpendable, tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost that equals or exceeds the lesser of the capitalization level established by the recipient for financial statement purposes, or \$5,000.

GoTriangle confirmed that vehicle inventories were completed in December 2017 and December 2021. The last inventory of non-vehicle FTA-funded equipment was in May 2018. Inventories of

FTA-funded equipment are not completed biennially. The recipient indicated that COVID-19 impacted completion of the inventory, but GoTriangle did not notify FTA or document the reason for the delay in its files.

2 CFR 200.313 Equipment

(d) Management requirements. Procedures for managing equipment (including replacement equipment), whether acquired in whole or in part under a Federal award, until disposition takes place will, as a minimum, meet the following requirements:

(1) Property records must be maintained that include a description of the property, a serial number or other identification number, the source of funding for the property (including the FAIN), who holds title, the acquisition date, and cost of the property, percentage of Federal participation in the project costs for the Federal award under which the property was acquired, the location, use and condition of the property, and any ultimate disposition data including the date of disposal and sale price of the property.

(2) A physical inventory of the property must be taken and the results reconciled with the property records at least once every two years.

Corrective Action and Schedule: By August 29, 2022, GoTriangle must submit to the FTA regional office:

- Evidence that it has performed the physical inventory and reconciliation of FTA-funded equipment (non-vehicles).
- Procedures for completing inventory and reconciliation biennially.

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 GoTriangle, 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 GoTriangle, no deficiencies were found with the FTA requirements for Procurement.

Five procurement files were reviewed. The table below provides more details about these procurements.

Contract/ Product	Award Date	Method	Amount	Deficiencies
19-030 Bus Repower Project	9-Aug-2019	RFP	\$4,500,000	None
15-010 6 40' Buses	19-Dec-2019	IFB	\$3,283,236	
236 18- Cameras for Vehicles	28-Feb-2020	State Contract	\$193,769.26	
21-046 Triangle Regional Model Service Bureau (TRMSB)	1-Jul-2021	Sole Source	\$ 247,232	
21-089 GoTriangle Plaza Building Renovation	31-Aug-2021	IFB	\$1,152,000	

10. Disadvantaged Business Enterprise (DBE)

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

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

Deficiency Description:

DBE5-1: DBE uniform reports contain inaccuracies and/or are missing required information

Recipients of FTA funds are expected to keep accurate data regarding contracts awarded and paid with FTA dollars and report on such per the instructions for completing the Uniform Report of DBE Awards or Commitments and Payments.

The recipient had backup documentation showing the procurement awards and payment data that was used to complete the Uniform Reports. Two procurements were sampled. One procurement had been included in the Uniform Reports, but the other had not. The recipient believed that they

did not need to report the TRMSB procurement as it was with NC State University. This award was documented as a sole source procurement action and should have been included in the December 2021 Uniform Report.

49 CFR 26.37(c)

This mechanism must provide for a running tally of actual DBE attainments (e.g., payments actually made to DBE firms), including a means of comparing these attainments to commitments. In your reports of DBE participation to the Department, you must display both commitments and attainments.

49 CFR Part 26 Appendix B “INSTRUCTIONS FOR COMPLETING THE UNIFORM REPORT OF DBE AWARDS/COMMITMENTS AND PAYMENTS”

Recipients of Department of Transportation (DOT) funds are expected to keep accurate data regarding the contracting opportunities available to firms paid with DOT dollars. Failure to submit contracting data relative to the DBE program will result in noncompliance with Part 26. All dollar values listed on this form should represent the DOT share attributable to the Operating Administration (OA): Federal Highway Administration (FHWA), Federal Aviation Administration (FAA) or Federal Transit Administration (FTA) to which this report will be submitted.

[see 49.CFR Part 26 Appendix B for uniform report instructions]

Corrective Action and Schedule: By August 29, 2022, GoTriangle must submit to the FTA regional office and Regional Civil Rights Officer (RCRO):

- The corrected December 2021 DBE Uniform Report
- An updated DBE Program including procedures for correctly completing Uniform Reports of DBE Awards or Commitments and Payments.

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 GoTriangle, 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 GoTriangle, one deficiency was found with the US DOT requirements for ADA – General.

Deficiency Description:

ADA-GEN8-4: Weight/size limitations on wheelchairs

A recipient must not set weight or size limitations on wheelchairs that it will transport that understate the weight capacity that the vehicle fleet can actually accommodate. On the ACCESS Application GoTriangle lists weight and size limitations on wheelchairs that understate its fleet capacity. The Paratransit Service Riders Guide includes alternative weight and size limitations. Materials presented to riders are not consistent and, in some cases, understate the capacity of the fleet.

49 CFR 37.3 Definitions

Wheelchair means a mobility aid belonging to any class of three- or more-wheeled devices, usable indoors, designed or modified for and used by individuals with mobility impairments, whether operated manually or powered.

49 CFR 37.165 Lift and securement use

(a) This section applies to public and private entities.

(b) Except as provided in this section, individuals using wheelchairs shall be transported in the entity's vehicles or other conveyances.

(1) With respect to wheelchair/occupant combinations that are larger or heavier than those to which the design standards for vehicles and equipment of 49 CFR Part 38 refer, the entity must carry the wheelchair and occupant if the lift and vehicle can accommodate the wheelchair and occupant. The entity may decline to carry a wheelchair/occupant if the combined weight exceeds that of the lift specifications or if carriage of the wheelchair is demonstrated to be inconsistent with legitimate safety requirements.

Corrective Action and Schedule: By August 29, 2022, GoTriangle must submit to the FTA regional office and RCRO:

- Updated information in the Rider's Guide, website, and application showing that it does not understate the wheelchairs that its vehicles can accommodate.

Subsequent to the virtual site visit, GoTriangle updated the website and Paratransit Service Rider's Guide to reflect the maximum size mobility device that GoTriangle can accommodate. This documentation was sufficient to address the deficiency in this area. This deficiency is now closed.

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 GoTriangle, deficiencies were found with US DOT requirements for ADA – Complementary Paratransit.

Deficiency Description:

ADA-CPT2-3: Eligibility appeals process not properly implemented

A recipient must notify applicants of the right to appeal and have an eligibility appeals process that includes the opportunity to be heard. The GoTriangle Paratransit Service Rider’s Guide includes information about the appeals process, which states appeals must be made in writing to the Transit Manager. The process does not include an opportunity to be heard.

49 CFR 37.125 ADA paratransit eligibility: Process

Each public entity required to provide complementary paratransit service by §37.121 of this part shall establish a process for determining ADA paratransit eligibility...

(g) The entity shall establish an administrative appeal process through which individuals who are denied eligibility can obtain review of the denial.

(1) The entity may require that an appeal be filed within 60 days of the denial of an individual's application.

(2) The process shall include an opportunity to be heard and to present information and arguments, separation of functions (i.e., a decision by a person not involved with the initial decision to deny eligibility), and written notification of the decision, and the reasons for it.

(3) The entity is not required to provide paratransit service to the individual pending the determination on appeal. However, if the entity has not made a decision within 30 days of the completion of the appeal process, the entity shall provide paratransit service from that time until and unless a decision to deny the appeal is issued.

Corrective Action and Schedule: By August 29, 2022, GoTriangle must submit to the FTA regional office and RCRO:

- An updated appeal process allowing the applicant to be heard.

Subsequent to the virtual site visit, GoTriangle provided an updated Regional Paratransit Service Rider’s Guide that documented the appeals process and provides the applicant with the

opportunity to be heard. This documentation was sufficient to address the deficiency in this area. This deficiency is now closed.

ADA-CPT4-4: Paratransit fare deficiency

The fare for a trip charged for complementary paratransit service must not exceed twice the fare that would be charged to an individual paying fixed route full fare (i.e., without regard to discounts) for a trip of similar length, at a similar time of day. The fares presented on the GoTriangle website and in the Paratransit Service Rider's Guide show that the policy for riders 12 and under is inconsistent between fixed route and paratransit services. On fixed route young people under 12 years ride free with an accompanying adult. On complementary paratransit children under 5 ride free with an accompanying adult.

49 CFR 37.5(a) prohibits discrimination against an individual with a disability in connection with the provision of transportation service. Thus, policies limiting the availability of transit to children under a certain age or requiring children under a certain age to be accompanied by an adult cannot be created solely for complementary paratransit. Any policy would also need to apply to the fixed route service to avoid a discriminatory practice. The GoTriangle Access Service Rider's Guide indicates that children under 12 must travel with an adult, but this is not the policy on fixed route.

49 CFR 37.131 Service criteria for complementary paratransit

The following service criteria apply to complementary paratransit required by §37.121 of this part.

(c) The Fares. The fare for a trip charged to an ADA paratransit eligible user of the complementary paratransit service shall not exceed twice the fare that would be charged to an individual paying full fare (i.e., without regard to discounts) for a trip of similar length, at a similar time of day, on the entity's fixed route system.

(1) In calculating the full fare that would be paid by an individual using the fixed route system, the entity may include transfer and premium charges applicable to a trip of similar length, at a similar time of day, on the fixed route system.

(2) The fares for individuals accompanying ADA paratransit eligible individuals, who are provided service under §37.123 (f) of this part, shall be the same as for the ADA paratransit eligible individuals they are accompanying.

(3) A personal care attendant shall not be charged for complementary paratransit service.

(4) The entity may charge a fare higher than otherwise permitted by this paragraph to a social service agency or other organization for agency trips (i.e., trips guaranteed to the organization).

Corrective Action and Schedule: By August 29, 2022, GoTriangle must submit to the FTA regional office and RCRO:

- Documentation showing that paratransit fares do not exceed twice the fare on comparable trip using fixed routes.
- Clarify if children under 12 must travel with an adult on complementary paratransit and fixed route services.

Subsequent to the virtual site visit, GoTriangle updated the website and Paratransit Service Rider's Guide to remove statements that children under 12 years or under 5 years must ride with an adult. Descriptions of fares were updated confirming that the fare for a trip charged to an ADA paratransit eligible rider is no more than twice the fixed route full fare for a similar trip. This documentation was sufficient to address the deficiency in this area. This deficiency is now closed.

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 GoTriangle, 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 Federal Transit Administration (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 GoTriangle, 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 GoTriangle, 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 GoTriangle, 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 GoTriangle, 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 Federal Transit Administration (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 GoTriangle, 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 the FTA; therefore, the related requirements are not applicable to the review of GoTriangle.

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 review of GoTriangle.

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 GoTriangle, no deficiencies were found with the FTA requirements for Public Transportation Agency Safety Plan 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; therefore, the related requirements are not applicable to the review of GoTriangle.

V. Summary of Findings

Review Area	Finding	Deficiency Codes	Corrective Actions	Response Due Date	Date Closed
1. Legal	ND				
2. Financial Management and Capacity	D	F1-1: Lacking/missing required written financial management policies and procedures	Submit to the FTA regional office: <ul style="list-style-type: none"> An updated and finalized Financial Management Policies and Procedures or other implemented document that includes procedures for determining allowability of cost and timely distribution of funds. Documentation showing that GoTriangle has trained appropriate staff on the new policies and procedures. 	August 29, 2022	
3. Technical Capacity – Award Management	D	TC-AM2-1: Incorrect FFR reporting	Submit to the FTA regional office: <ul style="list-style-type: none"> Revised reports for NC-2020-037 that include the missing/corrected information and address FTA comments. Procedures for including all required information in future FFR reports, including improved tracking, communication of data between departments, and ensuring that the OST and FTA FFRs are consistent. 	August 29, 2022	
4. Technical Capacity – Program Management and Subrecipient Oversight	NA				
5. Technical Capacity – Project Management	ND				
6. Transit Asset Management	ND				
7. Satisfactory Continuing Control	D	SCC8-4: No evidence of physical inventory or reconciliation	Submit to the FTA regional office: <ul style="list-style-type: none"> Evidence that it has performed the physical inventory and reconciliation of FTA-funded equipment (non-vehicles) Procedures for completing inventory and reconciliation biennially. 	August 29, 2022	
8. Maintenance	ND				
9. Procurement	ND				
10. Disadvantaged Business Enterprise	D	DBE5-1: DBE uniform reports contain inaccuracies and/or are missing required information	Submit to the FTA regional office and RCRO: <ul style="list-style-type: none"> The corrected December 2021 DBE Uniform Report An updated DBE Program including procedures for correctly completing Uniform Reports of DBE Awards or Commitments and Payments. 	August 29, 2022	

Review Area	Finding	Deficiency Codes	Corrective Actions	Response Due Date	Date Closed
11. Title VI	ND				
12. Americans with Disabilities Act (ADA) – General	D	ADA-GEN8-4: Weight/size limitations on wheelchairs	Submit to the FTA RCRO: <ul style="list-style-type: none"> Updated information in the Rider's Guide, website, and application showing that it does not understate the wheelchairs that its vehicles can accommodate. 	August 29, 2022	April 28, 2022
13. ADA – Complementary Paratransit	D	ADA-CPT2-3: Eligibility appeals process not properly implemented	Submit to the FTA RCRO regional office: <ul style="list-style-type: none"> An updated appeal process allowing the applicant to be heard. 	August 29, 2022	April 28, 2022
		ADA-CPT4-4: Paratransit fare deficiency	Submit to the FTA RCRO: <ul style="list-style-type: none"> Documentation showing that paratransit fares do not exceed twice the fare on comparable trip using fixed routes. Clarify if children under 12 must travel with an adult on complementary paratransit and fixed route services. 	August 29, 2022	April 28, 2022
14. Equal Employment Opportunity	ND				
15. School Bus	ND				
16. Charter Bus	ND				
17. Drug-Free Workplace	ND				
18. Drug and Alcohol Program	ND				
19. Section 5307 Program Requirements	ND				
20. Section 5310 Program Requirements	NA				
21. Section 5311 Program Requirements	NA				
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
<i>GoTriangle</i>			
Charlies Lattuca	President & Chief Executive Officer	919-485-7424	clattuca@gotriangle.org
Scott Thomas	Executive Vice President	919 485-7413	sthomas@gotriangle.org
Byron Smith	General Counsel	919-485-7561	bsmith@gotriangle.org
Sharon Chavis	Chief of Staff to the President & Chief Executive Officer	919-485-7555	schavis@gotriangle.org
Katharine Eggleston	Chief Development Officer	919-485-7564	keggleston@gotriangle.org
Saundra Freeman	Chief Financial Officer	919-485-7415	sfreeman@gotriangle.org
Patrick Stephens	Chief of Operations	919-485-7456	pstephens@gotriangle.org
Gary Tober	Real Estate Director	919-485-7577	gtober@gotriangle.org
Harriet Lyons	Budget & Financial Reporting Supervisor	919-485-7466	hlyons@gotriangle.org
Carolyn Lyons	Chief Talent Officer	919-314-8749	clyons@gotriangle.org
Thomas Henry	Associate General Counsel	919-485-7589	thenry@gotriangle.org
Karen Porter	Associate General Counsel	919-485-7421	kporter@gotriangle.org
Deirdre Walker	Senior Manager Administration	919-485-7481	dwalker@gotriangle.org
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Tammy Romain	Paratransit Operations Manager	919-485-7464	tromain@gotriangle.org
Jimmy Price	Manager of Safety and Facilities	919-485-7492	jprice@gotriangle.org
Brian Mclean	Maintenance Manager	919-485-7472	bmclean@gotriangle.org
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David Jerrido	Transit Service Planner	919-485-7549	djerrido@gotriangle.org
Meg Scully	Manager of Planning & Transit-Oriented Development	919-485-7455	mscully@gotriangle.org

Christy Winstead	Benefits & Rewards Manager	919-485-7473	cwinstead@gotriangle.org
Richard Major	Director of Capital Development	919-485-7483	rmajor@gotriangle.org
<i>FTA</i>			
D. Michele Foster	Regional Civil Rights Officer	404-865-5633	dmMichele.foster@dot.gov
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<i>TFC Consulting, Inc.</i>			
Philippa Drew	Lead Reviewer	857-576-1512	pdrew@tfcci.net
Philip A. Sherer	Lead Reviewer	732-598-7749	psherer@tfci.net

VII. Appendices

No appendices included in this report.