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of Transportation
**Federal Transit
Administration**

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August 1, 2022

Mr. Sanjay Ramabhadran
Chair
Metropolitan Transit Authority of Harris County Board of Directors
P.O. Box 61429
Houston, TX 77208-1429

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

Dear Mr. Ramabhadran:

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 the Metropolitan Transit Authority of Harris County (METRO) of Houston, Texas. Although not an audit, the Triennial Review is the FTA's assessment of METRO'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 METRO'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, the Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA) of 2021, and the American Rescue Plan (ARP) Act of 2021.

The Triennial Review focused on METRO's compliance in 23 areas. No deficiencies were found with the FTA requirements in 21 of these areas. Deficiencies were found in two areas: Satisfactory Continuing Control and Title VI. METRO had no repeat deficiencies from the fiscal year 2018 Triennial Review.

Subsequent to the site visit, METRO provided corrective action responses to address/and close deficiencies noted in the Satisfactory Continuing Control area of the report that follows.

As METRO 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. Troy Thomas, FTA General Engineer, at 817-978-0558 or by email at troy.thomas@dot.gov, or Mr. Donald Lucas, your reviewer, at 202-726-2630 or by email at donald.lucas@thedmpgroup.com.

Sincerely,

Gail Lyssy
Regional Administrator

Enclosure

cc: Thomas C. Lambert, President and Chief Executive Officer, METRO
Donald Lucas, Lead Reviewer, The DMP Group

FINAL REPORT

**FISCAL YEAR 2022
TRIENNIAL REVIEW**

of

**Metropolitan Transit Authority of Harris County
(METRO)
Houston, Texas
ID: 1547**

Performed for:

**U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION
REGION 6**

Prepared by:

The DMP Group, LLC

Scoping Meeting Date: February 18, 2022

Virtual Site Visit Date: May 10–12, 2022

Draft Report Date: June 23, 2022

Final Report Date: August 1, 2022

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I. Executive Summary

This report documents the Federal Transit Administration’s (FTA) Triennial Review of the Metropolitan Transit Authority of Harris County (METRO) of Houston, Texas. 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 The DMP Group, LLC. 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 METRO’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, the Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA) of 2021, and the American Rescue Plan (ARP) Act of 2021. METRO 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 METRO’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
1. Legal (L)		
2. Financial Management and Capacity (F)		
3. Technical Capacity – Award Management (TC-AM)		
4. TC – Program Management and Subrecipient Oversight (TC-PgM)		
5. TC – Project Management (TC-PjM)		
6. Transit Asset Management (TAM)		

Review Area	Deficiencies	
	Code	Description
7. Satisfactory Continuing Control (SCC)	SCC1-1	Property records missing information
	SCC1-3	Property reports not submitted as required
8. Maintenance (M)		
9. Procurement (P)		
10. Disadvantaged Business Enterprise (DBE)		
11. Title VI (TVI)	TVI8-1	Impact of fare and/or service changes not adequately examined
	TVI8-4	Not implementing Title VI monitoring of service or amenities
12. Americans with Disabilities Act (ADA) – General (ADA-GEN)		
13. ADA – Complementary Paratransit (ADA-CPT)		
14. Equal Employment Opportunity (EEO)		
15. School Bus (SB)		
16. Charter Bus (CB)		
17. Drug-Free Workplace Act (DFWA)		
18. Drug and Alcohol Program (DA)		
19. Section 5307 Program Requirements (5307)		
20. Section 5310 Program Requirements (5310)		
21. Section 5311 Program Requirements (5311)		

Review Area	Deficiencies	
	Code	Description
22. Public Transportation Agency Safety Plan (PTASP)		
23. Cybersecurity (C)		

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 METRO. The review concentrated on procedures and practices employed since METRO’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 METRO’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 they suspended, deviated from, or significantly updated or altered their 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 METRO on November 29, 2021, indicating a review would be conducted. While METRO prepared its response to the RIR, the regional office and review team conducted a desk review and scoping meeting on February 18, 2022. Necessary files retained by the regional office were sent to the reviewers electronically. Following the desk review and scoping meeting, the reviewers and METRO 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 sent to METRO on May 4, 2022. The virtual site visit to METRO occurred on May 10–12, 2022.

The virtual 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 METRO’s compliance with FTA requirements.

Four Section 5310 subrecipients (Educational Programs Inspiring Communities, East End District, Gulf Coast Transit District, and Montrose Redevelopment Authority) and two operations contractors (Greater Houston Transportation Company and First Transit, Inc.) were reviewed virtually to provide an overview of activities related to FTA-funded projects. The reviewers also examined a sample of procurement files during this review.

Upon completion of the virtual site visit, the FTA and the reviewers provided a summary of preliminary findings to METRO 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

METRO is an independent regional transit authority pursuant to the provisions of Article 1118x of the Texas Revised Civil Statutes. Its enabling legislation has been recodified as Chapter 451.1.1 of the Texas Transportation Code. METRO began service in 1979. Its Board of Directors has nine members, appointed by the mayor of Houston, the mayors of METRO's 14 other member cities, and by the Harris County Commissioners Court. METRO provides transit service in the communities of the Cities of Houston, Bellaire, Bunker Hill Village, El Lago, Hedwig Village, Hilshire Village, Humble, Hunters Creek, Katy, Missouri City, Piney Point Village, Southside Place, Spring Valley, Taylor Lake Village, West University Place, and certain portions of unincorporated Harris County. The population of its service area is approximately 3,757,692.

METRO provides bus, bus rapid transit (BRT), light rail, paratransit, non-ADA demand-response, and van pool services. METRO operates bus services from six operations/maintenance locations, of which five are directly operated by METRO. The sixth, Northwest Bus Operations Facility, is contracted out to First Transit, Inc. There are 21 transit centers throughout the region.

METRO directly operates its light rail line and completely contracts out its ADA complementary paratransit service. METRO is under contract with First Transit to provide ADA complementary paratransit service through December 31, 2022. Through May 2022, METRO also contracted with Greater Houston Transportation Company (GHTC), DBA Yellow Cab, to provide ADA complementary paratransit and non-ADA demand-response service. Beginning in April 2021, METRO contracted with MV Transportation to provide ongoing ADA complementary paratransit service through September 2026. First Transit uses a fleet of 176 federally funded vehicles and GHTC used 275 minivans operated by owner/operators to provide dedicated ADA complementary paratransit and non-ADA demand-response services.

At the time of the review, METRO operated a network of 83 local bus routes, 16 Park & Ride bus routes, three curbside services, one BRT route, and three light rail lines. Service varies depending on the route, but most routes operate seven days a week and some nearly 24 hours a day. METRO's ADA complementary paratransit service, METROLift, operates during the same days and times as its fixed-route bus service. METRO's Silver Line BRT service operates from 4:45 a.m. to 12:45 a.m. (next day).

METRO operates a light rail system of approximately 22.7 miles in length, with 42 stations. Of the 75-car fleet, 57 are federally funded. Service is provided 3:35 a.m. through 1:24 a.m. Monday through Thursday; 3:35 a.m. to 3:40 a.m. on Friday; 4:29 a.m. to 3:40 a.m. on Saturday; and 4:29 a.m. to 3:40 a.m. on Sunday. There are two rail maintenance centers in Houston: the Rail Operations Center on West Bellfort and the Service and Inspection Facility on Texas Street.

The basic adult fare for bus service is \$1.25. A reduced fare of \$0.60 is offered at all times for senior citizens, persons with disabilities, Medicare card holders, and students. The fare is \$1.25 for the complementary paratransit service and \$2.50 for the extended non-ADA service area. No passes are accepted for the extended service area. METRO offers all approved METROLift

customers the Freedom Q® Card, which allows all eligible riders to use the local bus service, rail, and park-and-ride system free of charge.

2. Award and Project Activity

Below is a list of METRO’s open awards at the time of the review.

Award Number	Award Amount	Year Executed	Description
TX-2021-125-00	\$20,183,738	2022	Houston METRO FY 2020 CMAQ West Belfort Park and Ride Construction
TX-2020-108-01	\$160,000	2021	Houston Metro Metropolitan Transit Authority of Harris County, Texas - Bus Monitoring Equipment (FY19 Innovations in Transit Public Safety FTA Section 5312)
TX-2021-008-00	\$30,000,000	2021	Houston METRO - CMAQ - Construction of ADA Projects (Universal Accessibility Project)
TX-2021-028-00	\$1,473,435	2021	Houston METRO Shuttle of the Future
TX-2021-045-00	\$14,770,058	2021	Houston METRO FY20 5339 Discretionary Bus Regional Fare Collection System
TX-2021-072-00	\$615,523	2021	Houston METRO Section 5310 ARPA Operating Assistance
TX-2021-079-00	\$615,514	2021	Houston METRO Section 5310 CRRSA Act Operating Assistance
TX-2021-089-00	\$298,675,777	2021	Houston METRO FY 2021 Section 5307 ARP Act Operating Assistance
TX-2021-127-00	\$242,406	2021	METRO (Montrose Road) Lapsing FY19 5310 1C Formula Program at 100% Federal Share – Sidewalk Construction
TX-03-0268-09	\$458,496,601	2020	North Corridor LRT FFGA
TX-2020-115-00	\$660,741	2020	Metropolitan Transit Authority of Harris County, Texas FY 2018 5310 Van, Operating, Admin.
TX-2020-144-00	\$11,863,799	2020	Houston METRO FY18 Discretionary 5339 and FY18 5339 Construction of ADA projects (Universal Accessibility Project)
TX-2019-068-00	\$7,317,848	2019	Houston METRO Lapsing FY16 5339 Grant
TX-2016-046-02	\$5,803,108	2018	Metropolitan Transit Authority of Harris County, Texas FY 2014-15 5310 Enhanced Mobility of Seniors and Individuals with Disabilities

Award Number	Award Amount	Year Executed	Description
TX-2017-046-01	\$6,824,000	2018	Cypress L Ramp & Magnolia Transit Center – FY 2017 FHWA CMAQ Flex to FTA 5307
TX-03-0269-10	\$460,666,238	2014	Southeast Corridor LRT FFGA
TX-95-X006-03	\$30,414,032	2014	CMAQ Funds
TX-05-0138-02	\$67,871,901	2012	FY 2007-2008-2009 Section 5309 FGM
TX-37-X059-04	\$12,950,220	2012	Houston JARC Program

METRO received Supplemental Funds for operating assistance in award numbers TX-2021-072-00, TX-2021-079-00, TX-2021-089-00, TX-2021-070-01 (closed), and TX-2020-070-01 (closed). The latter award represents METRO’s first time receiving operating assistance from the FTA.

Projects Completed

In the past few years, METRO completed the following noteworthy FTA-funded projects:

- Northwest Transit Center Modification and Expansion Project
- Rail Operations Center Yard Track Expansion Project

Ongoing Projects

METRO is currently implementing the following noteworthy FTA-funded projects:

Cypress Park & Ride T-ramp (partnership): This project involves acquisition of ROW to relocate the existing westbound frontage road of US 290 to the north for incremental widening of US 290 to allow a direct connector T-ramp between the Cypress Park & Ride lot and the US 290 express lane. The T-ramp construction would involve utility relocation and the construction of concrete pavement, drainage facilities, and retaining walls. The project aims to improve bus access, overall circulation, and safety.

Inner Katy METRORapid/BRT: This project involves the Inner Katy Corridor to the Northwest Transit Center / proposed high-speed rail / uptown section of the city. The Inner Katy METRORapid/BRT route runs along I-10 (Katy Freeway) between the Northwest Transit Center (at the junction of I-10 West and I-610) and the Convention District area in downtown Houston with a possible connection to the proposed high-speed rail.

University Corridor METRORapid/BRT: This project involves the University Corridor between Westchase and Tidwell. The University Corridor METRORapid/BRT line is in the Westpark, Richmond, and Lockwood Corridors and runs from the Westchase Park & Ride to the Tidwell Transit Center.

West Bellfort Park & Ride modifications: There is an immediate need for parking expansion at the West Bellfort Park & Ride lot due to overcapacity and safety issues. The existing parking capacity is as high as 108% during most weekdays of the year. Planning has evaluated a range of

options maximizing the existing use of the park & ride as well as additional parking for the facility. The project has progressed into a design for a parking garage that will accommodate approximately 3,000 spaces to meet current demand and demand far into horizon years.

Northline Transit Center: The proposed facility will improve the customer experience and provide improved access to employment and educational facilities, such as the Houston Community College Northline Campus. The new transit center will be in the immediate vicinity of the current Northline Transit Center and will provide seven to eight covered bays and a multi-story parking structure with approximately 500 parking spaces.

Maintenance of way: The Rail Operations Center Yard Track Expansion Project will add four new ballasted storage tracks to increase the total light rail vehicle storage capacity from 40 to 60 vehicles. The project also includes the overhead contact system, drainage, asphalt walkways and a perimeter road, a water line extension, and landscaping. A maintenance of way facility was initially included in the Full Funding Grant Agreement Phase 2 at the Rail Operations Center.

BOOST Corridor Network: The Bus Operation Optimized System Treatments (BOOST) project will make services faster and more reliable in certain highly traveled corridors through methods such as consolidating stops and signal coordination.

The following BOOST projects will improve the customer experience by increasing reliability and average speed of service and improving accessibility of the service:

- Scott 54 BOOST, an 11-mile corridor (Downtown Transit Center to MLK Health Center)
- Montrose 56 BOOST, a 23-mile corridor (Texas Medical Center Transit Center to Greenspoint Transit Center)
- Westheimer 82 BOOST improvements may consist of sidewalk improvements, bus stop amenities, bus shelters, signage, wayfinding, intersection treatments and enhancements that result in the optimization of the service.

Universal Accessibility Program: This capital upgrade program is designed to ensure that METRO's facilities and services are usable for all riders. Improvements include installing new bus shelters, sidewalks, ADA ramps, bus stop pads, and crosswalks considered as Tier 1 Bus Stop ADA Compliance upgrades. The Universal Accessibility Program will identify all stops in the METRO bus network that are not ADA compliant and assign a path to compliance. Designs will be completed for all noncompliant sites and will be constructed based on their transit need and ridership.

Burnett Transit Center third elevator addition: This project entails the installation of an additional elevator that will provide an increased level of comfortable and safe access for pedestrians to and from the Burnett Transit Center/Casa De Amigos Station to the bus platform.

Missouri City Park & Ride: This project will provide a park & ride facility within the vicinity of Highway 6 in Missouri City. The 203 spaces at the temporary interim lot at Kroger are currently

above 100% capacity. The anticipated location of the park & ride in Fort Bend County, Texas, will serve the SH-6 / Southwest US 59 Corridor.

Emergency Operations Center: METRO's Emergency Operations Center is a command facility whose purpose is to ensure METRO can return to critical functions with minimal loss during emergencies. The Emergency Operations Center's functions are distributed among METRO Police Department areas, which are currently divided among multiple facilities. The facility will be located on the existing Amegy Bank garage and parking lot adjacent to the Red Line and the METRO Headquarters and Downtown Transit Center.

Future Projects

METRO reported no noteworthy FTA-funded projects planned for the next three to five years.

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 METRO, 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 METRO, 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 METRO, no deficiencies were found with the FTA requirements for Technical Capacity – Award Management.

4. Technical Capacity – Program Management & Subrecipient Oversight

Basic Requirement: States must document and follow a public involvement process for the development of the long-range statewide transportation plan and State Transportation Improvement Program (STIP). Designated recipients of Sections 5310, 5311, and 5339 funds must develop and submit a State Management/ Program Management Plan to the FTA for approval. Recipients must enter into an agreement with each subrecipient, obtain required certifications from subrecipients, report in the Federal Funding Accountability and Transparency Act Subaward Reporting System (FSRS) on subawards, and ensure subrecipients comply with the terms of the award.

Finding: During this Triennial Review of METRO, no deficiencies were found with the FTA requirements for Technical Capacity – Program Management & Subrecipient Oversight.

5. Technical Capacity – Project Management

Basic Requirement: The recipient must be able to implement the 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 METRO, 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 METRO, 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 METRO, two deficiencies were found with the FTA requirements for Satisfactory Continuing Control.

Deficiency Descriptions:

SCC1-1: Property records missing information

For Awards and Cooperative Agreements (and funding increments to existing Awards and Cooperative Agreements) awarded on or after December 26, 2014, recipients must maintain adequate property records and submit reports on the status of real property in which the Federal government retains an interest. A real property inventory must include property location/physical address; use and condition; summary of conditions on the title; brief description of improvements, expansions, and retrofits; corresponding useful life for the assets; date placed in service; original acquisition cost; sources of funding; Federal and non-Federal participation ratios; award identification number; appraised value and date; anticipated disposition or action proposed; date of disposal; and sale price of the property. If the property is excess, the recipient must identify the reasons for having excess property, such as purchase to a logical boundary. This real property inventory is necessary in order to accurately account for assets and determine an equitable valuation of Federal interest retained in the property.

At the time of the virtual site visit, METRO did not provide the required real property records. After the virtual site visit, METRO provided a spreadsheet that included column headings for

each of the required property information elements; however, several of the columns contained no information (e.g., condition on title, Federal participation ratio, and useful life).

2 CFR 200.311 Real property

(b) Use. Except as otherwise provided by Federal statutes or by the Federal awarding agency, real property will be used for the originally authorized purpose as long as needed for that purpose, during which time the non-Federal entity must not dispose of or encumber its title or other interests.

FTA Circular 5010.1E Ch. IV, Section 2. Real Property, (i) Property Management (2)-(6)(a)3a-e

(2) Use. Real property must be used for the originally authorized purpose as long as needed for that purpose. Recipients must not dispose of, modify the use of, or encumber its title or other interests in the Federally assisted site and facilities without prior FTA written approval. Recipients are required to use Federally assisted property continuously and appropriately throughout the useful life of the property. Recipients may be required to return the entire amount of Federal assistance spent on the Award or Federally assisted property thereunder if, during the useful life, the recipient has unreasonably delayed or failed to use the Federally assisted property for its originally intended purpose. Recipients are also required to notify FTA before property is removed from the service originally intended at the time of approval of the Award and if property is put to additional or substitute uses.

(3) Maintenance. Real property must be appropriately maintained. A description of the improvements, expansions, retrofits, and maintenance of real property must be properly documented in the facility inventory along with parcel address or location, useful life, date placed in service, original acquisition cost and Federal percentage of cost in order to accurately determine an equitable valuation of Federal interest at the time of early disposition of the asset.

SCC1-3: Property reports not submitted as required

Real property reports must be submitted annually. In those instances when the Federal interest extends for a period of 15 years or more, FTA may require the non-Federal entity to report at various multi-year frequencies not to exceed five years. FTA requires recipients to upload the reports to the Transit Award Management System (TrAMS) under recipient documents and email the regional office when the report has been uploaded. METRO did not submit the required real property reports.

2 CFR 200.330 Reporting on real property

The Federal awarding agency or pass-through entity must require a non-Federal entity to submit reports at least annually on the status of real property in which the Federal government retains an interest, unless the Federal interest in the real property extends 15 years or longer. In those instances where the Federal interest attached is for a period of 15 years or more, the Federal awarding agency or pass-through entity, at its option, may require the non-Federal entity to report at various multi-year frequencies (e.g., every two years or every three years, not to exceed a five-year reporting period; or a Federal awarding agency or pass-through entity may require

annual reporting for the first three years of a Federal award and thereafter require reporting every five years).

FTA Circular 5010.1E Ch. IV, Section 2. Real Property, (i) Property Management (2)-(6)(a)3a-e

(5) Reporting on Real Property. Recipients must maintain adequate records on the status of real property in which the Federal Government retains an interest. FTA requires that recipients maintain a real property inventory on file for review upon request by FTA to satisfy the requirements of 2 CFR § 200.329, which requires recipients to submit reports on an annual basis for real property in which the Federal Government retains an interest. In instances where the Federal interest in the real property will extend for a period of 15 years or more, a recipient may request FTA's permission to report at multi-year frequencies, not to exceed a five-year reporting period. A Real Property Inventory must include: property location/physical address; use and condition of the property; summary of conditions on the title; brief description of improvements, expansions, and retrofits; corresponding useful life for the assets; date placed in service; original acquisition cost; sources of funding; Federal and non-Federal participation ratios; Federal award identification number; appraised value and date; anticipated disposition or action proposed; date of disposal; and sale price of the property. If the property is excess, identify the reasons for having excess property, such as purchase to a logical boundary. This inventory is necessary in order to accurately account for assets, and determine an equitable valuation of Federal interest retained in the property. The Excess Real Property Inventory and Utilization Plan requirement applies only to Grants or Cooperative Agreements awarded before December 26, 2014. The Real Property Reporting requirement (Real Property Inventory) replaces the Excess Real Property Inventory and Utilization Plan requirement for Grants and Cooperative Agreements (and funding increments to existing Grants and Cooperative Agreements) awarded on or after December 26, 2014.

Corrective Action(s) and Schedule:

For the deficiency *Property records missing information* (SCC1-1), by August 31, 2022, METRO must prepare and submit to the FTA regional office updated real property reports with all missing information. After the exit conference and before the issuance of the final report, METRO provided an updated FTA-funded property record that includes all required information. *This deficiency is now closed.*

For the deficiency *Property reports not submitted as required* (SCC1-3), by August 31, 2022, METRO must prepare and submit to the FTA regional office real property reports along with procedures for preparing and submitting such reports in a timely manner. After the exit conference and before the issuance of the final report, METRO submitted its updated FTA-funded property record that includes all required information to FTA. *This deficiency is now closed.*

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 METRO, 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 METRO, 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 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 METRO, 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 METRO, two deficiencies were found with the FTA requirements for Title VI.

Deficiency Descriptions:

TVI8-1: Impact of fare and/or service changes not adequately examined

If a transit agency operating 50 or more fixed-route vehicles in peak service and located in an urbanized area (UZA) with a population of 200,000 or more chooses to make permanent any fare media changes that are instituted during an emergency, or if such changes last longer than six months, then the transit agency must perform a fare equity analysis as described in Chapter IV of FTA's Title VI Circular 4702.1B. Similarly, if a transit agency chooses to make permanent any service changes that are instituted during an emergency, or changes in service last longer than 12 months, then the transit agency must perform a service equity analysis. In March 2020 and November 2020, in response to the COVID-19 public health emergency, METRO reported making major service changes. During the virtual site visit, METRO reported that these changes have been in place for more than 12 months; however, METRO did not conduct the required service equity analysis.

Additional technical assistance was provided to METRO on how to improve its disparate impact, disproportionate burden, and public participation policies for major service changes. Specifically, METRO was advised to establish a statistical measure that determines when a major service change results in a disparate impact or disproportionate burden, as such a measure was not established in METRO's most recent Title VI program (see Appendix I Service and Fare Equity Policy). METRO was also advised to update its written public participation procedures for major service changes to include a description of how it will conduct public involvement meetings and consider public input received during those meetings, as it does in its public participation procedures for fare and fare media changes. Based on the technical assistance provided, METRO confirmed during the virtual site visit that it would update its disparate impact, disproportionate burden, and public participation policies for major service changes and submit them to METRO's board for approval at its next opportunity.

FTA Frequently Asked Questions from FTA Grantees Regarding Coronavirus Disease 2019 (COVID-19), CR2

Under FTA's Title VI Circular 4702.1B, transit providers that operate 50-or-more fixed route vehicles in peak service and are located in an urbanized area (UZA) with a population of 200,000 or more, must perform a service equity analysis whenever they make a major service change. The service equity analysis evaluates the impacts of the proposed service changes on Title VI-protected populations and low-income populations. Temporary service changes in response to an emergency do not rise to the level of a major service change, so a service equity analysis is not required. Similarly, FTA exempts all temporary fare changes enacted as a result of an emergency from the fare equity analysis requirement. However, if a transit agency chooses to make permanent any changes made during an emergency, or if changes last longer than 12 months (service) or 6 months (fare), then the transit agency must perform a service or fare equity analysis.

FTA does expect that all transit agencies take reasonable measures to implement temporary service or fare changes equitably to prevent unintentional discrimination. FTA does not require a transit agency to document this process, get board approval prior to implementing changes, or share documentation on the changes with FTA, but FTA recommends that transit agencies

document the rationale for specific service reductions, as well as steps taken to ensure equitable reductions in service, in the event someone files a complaint.

Changes directly or indirectly related to an emergency, including ridership and budget reductions, that continue longer than 12 months (service) or 6 months (fare), or are planned in advance as permanent require an equity analysis. As outlined in the Title VI Circular Chapter IV, Section 7, any major service change that lasts longer than 12 months is considered permanent and requires a service equity analysis. This timeframe applies to major service changes initially enacted in response to the COVID-19 public health emergency. Similarly, any fare change—even if initially enacted in response to an emergency—that lasts longer than 6 months is considered permanent and requires a fare equity analysis. Further, transit agencies must prepare an equity analysis during the planning process for planned major service changes or fare changes consistent with the Circular.

FTA Frequently Asked Questions from FTA Grantees Regarding Coronavirus Disease 2019 (COVID-19), CR15

FTA cautions that changes in fare media policies—such as temporarily not accepting cash fares, e.g., only pre-purchased media (often referred to as a cashless or cash-free fare policy)—may discriminate against minority transit riders. Minority transit riders may be disproportionately unbanked, lack credit cards, or lack access to locations for purchasing fare media in advance of a trip. FTA expects all transit agencies to consider mitigating measures in this circumstance to ensure their fare media changes do not result in disparate impacts on the basis of race, color, or national origin, which are protected categories under Title VI of the Civil Rights Act of 1964. If a transit agency operating 50 or more fixed route vehicles in peak service and located in an urbanized area (UZA) with a population of 200,000 or more chooses to make permanent any fare media changes that are instituted during an emergency, or if such changes last longer than six months, then the transit agency must perform a fare equity analysis as described in Chapter IV of FTA’s Title VI Circular 4702.1B.

TV18-4: Not implementing Title VI monitoring of service or amenities

FTA Circular 4702.1B requires recipients to monitor their transit service against the recipients’ established service standards, comparing the performance of minority routes to the performance of nonminority routes, and the performance of low-income routes to the performance of non-low-income routes. FTA Circular 4702.1B provides a minority route definition that is to be used by recipients for Title VI monitoring purposes. The Circular defines a minority route as a route that has at least one-third of its total revenue mileage in a Census block or block group, or traffic analysis zone(s) with a percentage of minority population that exceeds the percentage of minority population in the transit service area. When conducting its most recent Title VI monitoring, METRO did not use the required minority route definition. After the virtual site visit, METRO re-evaluated its vehicle load performance using the required minority route definition, with different outcomes. METRO must re-evaluate the performance of its other systemwide service standards and policies using the correct minority route definition.

FTA Circular 4702.1B Chapter IV 6. Requirement to Monitor Transit Service

FTA requires these transit providers to monitor the performance of their transit system relative to their system-wide service standards and service policies (i.e., vehicle load, vehicle assignment, transit amenities, etc.) not less than every three years. (Additional details follow in this section of the Circular.)

If a transit provider determines, based on its monitoring activities, that prior decisions have resulted in a disparate impact on the basis of race, color, or national origin, the transit provider shall take corrective action to remedy the disparities to the greatest extent possible, and shall discuss in the Title VI Program these disparate impacts and actions taken to remedy the disparities.

Transit providers shall brief and obtain approval from the transit providers' policymaking officials, generally the board of directors or appropriate governing entity responsible for policy decisions regarding the results of the monitoring program.

Corrective Action(s) and Schedule:

For the deficiency *Impact of fare and/or service changes not adequately examined* (TVI8-1), by September 30, 2022, METRO must submit to the FTA Regional Civil Rights Officer (RCRO) an equity analysis for any major service change that occurred in response to the COVID-19 public health emergency and lasted more than 12 months.

For the deficiency *Not implementing Title VI monitoring of service or amenities* (TVI8-4), by September 30, 2022, METRO must prepare and submit to the FTA RCRO an updated monitoring program, consistent with the procedures in FTA Circular 4702.1B, along with evidence of implementation.

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 METRO, 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 METRO, no deficiencies were found with the US DOT requirements for ADA – Complementary Paratransit.

14. Equal Employment Opportunity

Basic Requirement: The recipient must ensure that no person in the United States shall on the grounds of race, color, religion, national origin, sex, age or disability be excluded from participating in, or denied the benefits of, or be subject to discrimination in employment under any project, program or activity receiving Federal financial assistance under the Federal transit laws.

Finding: During this Triennial Review of METRO, 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 METRO, 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 METRO, 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 METRO, 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 METRO, 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 METRO, 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.

Finding: During this Triennial Review of METRO, no deficiencies were found with the FTA requirements for Section 5310 Program Requirements.

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 METRO.

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 METRO, no deficiencies were found with the FTA requirements for Public Transportation Agency Safety Plan.

23. Cybersecurity

Basic Requirement: Recipients that operate rail fixed guideway public transportation systems must certify compliance with the requirements for establishing a cybersecurity process under 49 U.S.C. § 5323(v), a new subsection added by the National Defense Authorization Act for Fiscal Year 2020, Pub. L. 116-92, § 7613 (Dec. 20, 2019).

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

V. Summary of Findings

Review Area	Finding	Deficiency Code(s)	Corrective Action(s)	Response Due Date(s)	Date Closed
1. Legal	ND				
2. Financial Management and Capacity	ND				
3. Technical Capacity – Award Management	ND				
4. Technical Capacity – Program Management and Subrecipient Oversight	ND				
5. Technical Capacity – Project Management	ND				
6. Transit Asset Management	ND				
7. Satisfactory Continuing Control	D	SCC1-1: Property records missing information	METRO must prepare and submit to the FTA regional office updated real property reports with all missing information. After the exit conference and before the issuance of the final report, METRO provided an updated FTA-funded property record that includes all required information. <i>This deficiency is now closed.</i>	8/31/2022	7/7/2022
	D	SCC1-3: Property reports not submitted as required	METRO must prepare and submit to the FTA regional office real property reports along with procedures for preparing and submitting such reports in a timely manner. After the exit conference and before the issuance of the final report, METRO submitted its updated FTA-funded property record that includes all required information to FTA. <i>This deficiency is now closed.</i>	8/31/2022	7/7/2022
8. Maintenance	ND				
9. Procurement	ND				
10. Disadvantaged Business Enterprise	ND				

Review Area	Finding	Deficiency Code(s)	Corrective Action(s)	Response Due Date(s)	Date Closed
11. Title VI	D	TVI8-1: Impact of fare and/or service changes not adequately examined	METRO must submit to the FTA RCRO an equity analysis for any major service change that occurred in response to the COVID-19 public health emergency and lasted more than 12 months.	9/30/2022	
	D	TVI8-4: Not implementing Title VI monitoring of service or amenities	METRO must prepare and submit to the FTA RCRO an updated monitoring program, consistent with the procedures in FTA Circular 4702.1B, along with evidence of implementation.	9/30/2022	
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	ND				
18. Drug and Alcohol Program	ND				
19. Section 5307 Program Requirements	ND				
20. Section 5310 Program Requirements	ND				
21. Section 5311 Program Requirements	NA		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 METRO.		
22. Public Transportation Agency Safety Plan	ND				
23. Cybersecurity	ND				

The metrics used to evaluate whether a recipient is meeting the requirements for each of the areas reviewed are as follows: Deficient (D)/Not Deficient (ND)/Not Applicable (NA).

VI. Attendees

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VII. Appendices

No appendices were included in this report.