

**FY 2015 Triennial
Review Report Closure
June 16, 2016**



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

REGION IX
Arizona, California, Hawaii,
Nevada, and the territories of
Guam, American Samoa and the
Northern Mariana Islands

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Mr. Michael D. Formby
Director, Department of Transportation Services
City and County of Honolulu
650 South King St., 3rd Floor
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JUN 16 2016

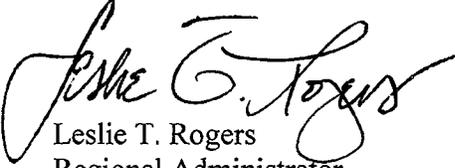
RE: FY 2015 Triennial Review Report Closure

Mike
Dear Mr. Formby:

Thank you for your staff's responses to the deficiencies reported in the Fiscal Year 2015 Triennial Review of the City and County of Honolulu, Hawaii. The responses indicate completion of corrective action on deficiencies contained in the review areas of Financial Management and Capacity, Technical Capacity, Americans with Disabilities Act (ADA), Title VI, Disadvantaged Business Enterprise (DBE), Satisfactory Continuing Control, Planning/Program of Projects (POP), Equal Employment Opportunity (EEO), and Procurement. After reviewing the documentation submitted, we conclude that corrective actions have been achieved and that no further correspondence is required. We have attached a copy of the finding summary with the closing date for your records.

Please convey our appreciation to your staff for their efforts and assistance in closing the FY 2015 Triennial Review. If you have any questions or comments, please contact Catherine Luu, Program Manager at (415) 734-9467 or via e-mail: catherine.luu@dot.gov.

Sincerely,


Leslie T. Rogers
Regional Administrator

Fiscal Year	Recipient ID	Grantee	Finding Code ID	Finding	Due Date	Close Date	Review Area
2015	1703	Honolulu, City & County Of	304	304 - Inadequate written fare and service change equity analysis procedures	4/27/2016	4/27/2016	Title VI
2015	1703	Honolulu, City & County Of	304	304 - Inadequate written fare and service change equity analysis procedures	4/27/2016	4/27/2016	Title VI
2015	1703	Honolulu, City & County Of	304	304 - Inadequate written fare and service change equity analysis procedures	4/27/2016	4/27/2016	Title VI
2015	1703	Honolulu, City & County Of	650	650 - Insufficient oversight of subrecipients for ADA complementary paratransit	1/25/2016	2/9/2016	ADA
2015	1703	Honolulu, City & County Of	650	650 - Insufficient oversight of subrecipients for ADA complementary paratransit	1/25/2016	2/9/2016	ADA
2015	1703	Honolulu, City & County Of	62	62 - Insufficient oversight of Title VI	12/15/2015	12/15/2015	Title VI
2015	1703	Honolulu, City & County Of	58	58 - Inadequate equipment records	10/12/2015	8/6/2015	Satisfactory Continuing Control
2015	1703	Honolulu, City & County Of	7	7 - Insufficient financial capacity	9/15/2015	8/20/2015	Financial Management and Financial Capacity
2015	1703	Honolulu, City & County Of	68	68 - Progress reports lack required information	7/30/2015	8/13/2015	Technical Capacity
2015	1703	Honolulu, City & County Of	68	68 - Progress reports lack required information	7/30/2015	7/15/2015	Technical Capacity
2015	1703	Honolulu, City & County Of	122	122 - Incorrect FFR reporting	7/30/2015	7/15/2015	Technical Capacity
2015	1703	Honolulu, City & County Of	175	175 - FFATA reporting deficiencies	7/13/2015	7/15/2015	Technical Capacity
2015	1703	Honolulu, City & County Of	175	175 - FFATA reporting deficiencies	7/13/2015	7/15/2015	Technical Capacity

2015	1703	Honolulu, City & County Of	84	84 - Lacking excess real property utilization inventory/plan out of date	7/13/2015	7/15/2015	Satisfactory Continuing Control
2015	1703	Honolulu, City & County Of	55	55 - Elements missing in POP public participation procedures	7/13/2015	7/15/2015	Planning/Program of Projects
2015	1703	Honolulu, City & County Of	55	55 - Elements missing in POP public participation procedures	7/13/2015	7/15/2015	Planning/Program of Projects
2015	1703	Honolulu, City & County Of	22	22 - Procurement policies and procedures not evident	7/13/2015	7/14/2015	Procurement
2015	1703	Honolulu, City & County Of	22	22 - Procurement policies and procedures not evident	7/13/2015	7/15/2015	Procurement
2015	1703	Honolulu, City & County Of	22	22 - Procurement policies and procedures not evident	7/13/2015	7/15/2015	Procurement
2015	1703	Honolulu, City & County Of	183	183 - No verification that excluded parties are not participating	7/13/2015	7/15/2015	Procurement
2015	1703	Honolulu, City & County Of	183	183 - No verification that excluded parties are not participating	7/13/2015	7/15/2015	Procurement
2015	1703	Honolulu, City & County Of	302	302 - Improper use of options	7/13/2015	7/15/2015	Procurement
2015	1703	Honolulu, City & County Of	344	344 - Responsibility determination deficiencies	7/13/2015	7/15/2015	Procurement
2015	1703	Honolulu, City & County Of	344	344 - Responsibility determination deficiencies	7/13/2015	7/15/2015	Procurement
2015	1703	Honolulu, City & County Of	33	33 - Improper complimentary paratransit eligibility determination process	6/12/2015	12/15/2015	ADA
2015	1703	Honolulu, City & County Of	73	73 - ADA Complementary Paratransit service deficiencies	6/12/2015	12/15/2015	ADA
2015	1703	Honolulu, City & County Of	73	73 - ADA Complementary Paratransit service deficiencies	6/12/2015	12/15/2015	ADA
2015	1703	Honolulu, City & County Of	62	62 - Insufficient oversight of Title VI	6/12/2015	9/14/2015	Title VI
2015	1703	Honolulu, City & County Of	62	62 - Insufficient oversight of Title VI	6/12/2015	9/14/2015	Title VI

2015	1703	Honolulu, City & County Of	22	22 - Procurement policies and procedures not evident	5/13/2015	6/2/2015	Procurement
2015	1703	Honolulu, City & County Of	365	365 - Other	5/13/2015	6/22/2015	Disadvantaged Business Enterprise
2015	1703	Honolulu, City & County Of	365	365 - Other	5/13/2015	6/22/2015	Disadvantaged Business Enterprise
2015	1703	Honolulu, City & County Of	520	520 - Employment practices analyses deficiencies	5/13/2015	6/22/2015	Equal Employment Opportunity
2015	1703	Honolulu, City & County Of	520	520 - Employment practices analyses deficiencies	5/13/2015	6/22/2015	Equal Employment Opportunity
2015	1703	Honolulu, City & County Of	142	142 - ECHO documentation deficient	4/30/2015	6/30/2015	Financial Management and Financial Capacity
2015	1703	Honolulu, City & County Of	79	79 - Inactive grants/untimely closeouts	4/30/2015	4/30/2015	Technical Capacity
2015	1703	Honolulu, City & County Of	122	122 - Incorrect FFR reporting	4/30/2015	7/30/2015	Technical Capacity

**FY 2015 Final Triennial
Review Report
April 9, 2015**



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

REGION IX
Arizona, California,
Hawaii, Nevada, Guam
American Samoa,
Northern Mariana Islands

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Mr. Michael D. Formby
Director, Department of Transportation Services
City and County of Honolulu
650 South King St., 3rd Floor
Honolulu, HI 96813

APR 09 2015

Re: FY 2015 Final Triennial Review Report

Dear Mr. Formby:

The enclosed final report documents the Federal Transit Administration's (FTA) Triennial Review of the City and County of Honolulu, Hawaii (City). This review is required by Chapter 53 of Title 49, United States Code, Section 5307. Although not an audit, the Triennial Review is the FTA's assessment of the City's compliance with federal requirements, determined by examining a sample of grant 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 grant requirements.

The Triennial Review focused on the City's compliance in 17 areas. No deficiencies were found with the FTA requirements in eight areas. Deficiencies were found in nine areas: Financial Management and Capacity, Technical Capacity, Americans with Disabilities Act (ADA), Title VI, Procurement, Disadvantaged Business Enterprise (DBE), Satisfactory Continuing Control, Planning/Program of Projects (POP), and Equal Employment Opportunity (EEO). There were repeat deficiencies from the 2012 Triennial Review as listed in the table below.

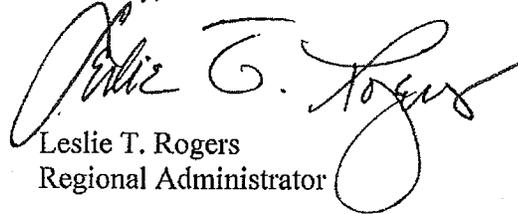
Repeat Deficiencies from the FY2012 Triennial Review	
Technical Capacity	D-68: Progress reports lack required information
	D-79: Untimely grant closeouts
	D-122: Incorrect FFR reporting

As part of this year's Triennial Review of the City, FTA incorporated Enhanced Review Modules (ERMs) in the Technical Capacity, Procurement, and ADA areas. The purpose of an ERM is to conduct a more comprehensive review of underlying or contributing issues identified during the pre-assessment stage of the Triennial Review. Deficiencies resulting from the ERM are presented in the Technical Capacity, Procurement and ADA sections of the report that follows.

Mr. Formby
Page 2 of 2

We greatly appreciate your commitment to making public transportation America's mode of choice. Thank you for your personal contribution, cooperation, and assistance during this Triennial Review since we realize that the review involved effort, time and planning. If you need any technical assistance or have any questions, please do not hesitate to contact Ms. Catherine Luu, Program Manager, by phone at (415) 744-2730 or by email at catherine.luu@dot.gov.

Sincerely,



Leslie T. Rogers
Regional Administrator

Enclosure

cc: Mark Au, City and County of Honolulu

FINAL REPORT

FY 2015 TRIENNIAL REVIEW

of the

**City and County of Honolulu
Honolulu, HI
Recipient ID: 1703**

Performed for:

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

Prepared by:

Milligan & Company, LLC

Scoping Meeting Date: December 17, 2014

Site Visit Dates: February 2 – 5, 2015

Final Report Date: April 9, 2015

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I. Executive Summary

This report documents the Federal Transit Administration’s (FTA) Triennial Review of the City and County of Honolulu, Hawaii (City). The review was performed by Milligan and Company, LLC. During the site visit, administrative and statutory requirements were discussed and documents were reviewed. The City’s transit facilities were toured to provide an overview of activities related to FTA-funded projects.

The Triennial Review focused on the City’s compliance in 17 areas. Deficiencies were found in the areas listed below.

Review Area	Deficiencies	
	Code	Description
Financial Management and Capacity	7	Insufficient financial capacity
	142	ECHO documentation deficient
Technical Capacity	68	Progress reports lack required information (<i>repeat</i>)
	79	Untimely grant closeouts (<i>repeat</i>)
	122	Incorrect FFR reporting (<i>repeat</i>)
	175	FFATA reporting deficiencies
Americans with Disabilities Act (ADA)	33	Improper ADA complementary paratransit eligibility determination process
	73	ADA complementary paratransit service deficiencies
	650	Insufficient oversight of contractors for ADA complementary paratransit
Title VI	62	Insufficient oversight of Title VI
	304	Inadequate written fare and service change equity analysis procedures
Procurement	22	Policies and procedures incomplete or out of date
	183	No verification that excluded parties are not participating
	302	Improper use of options
	344	Responsibility determination deficiencies
Disadvantaged Business Enterprise (DBE)	365	Other - ARRA quarterly reports were not submitted timely
Satisfactory Continuing Control	58	Inadequate equipment records
	84	Lacking excess real property utilization inventory/plan out of date
Planning/Program of Projects	55	Elements missing in POP public participation procedures

Review Area	Deficiencies	
	Code	Description
Equal Employment Opportunity	520	Employment practices analyses deficiencies

As part of this year's Triennial Review of the City, FTA incorporated Enhanced Review Modules (ERMs) in the Technical Capacity, Procurement, and ADA areas. The purpose of an ERM is to conduct a more comprehensive review of underlying or contributing issues identified during the pre-assessment stage of the Triennial Review. Deficiencies resulting from the ERM are presented in the Technical Capacity, Procurement, and ADA sections of this report.

II. Review Background and Process

1. Background

The United States Code, Chapter 53 of Title 49, requires the FTA of the United States Department of Transportation (USDOT) to perform reviews and evaluations of Urbanized Area Formula Grant activities at least every three years. This requirement is contained in 49 U.S.C. 5307(f) (2). This review was performed in accordance with FTA procedures (published in FTA Order 9010.1B, April 5, 1993). At least once every three years, the Secretary shall review and evaluate completely the performance of a grantee in carrying out its program, specifically referring to compliance with statutory and administrative requirements.

The Triennial Review includes a review of the grantee's compliance in 17 areas. The basic requirements for each of these areas are summarized in Section IV.

This report presents the findings from the Triennial Review of the City. The review concentrated on procedures and practices employed during the past three years; however, coverage was extended to earlier periods as needed to assess the policies in place and the management of grants. The specific documents reviewed are referenced in this report and are available at FTA's regional office or at the grantee's office.

2. Process

The Triennial Review process includes a pre-review assessment, a review scoping meeting with the FTA regional office, and an on-site visit to the grantee's location. The review scoping meeting was conducted with the Region IX Office on December 17, 2014. Necessary files retained by the regional office were sent to the reviewer electronically. A grantee information request and review package was sent to the City advising it of the site visit and indicating information that would be needed and issues that would be discussed. The site visit to the City occurred February 2 through 5, 2015.

The onsite portion of the review began with an entrance conference, at which the purpose of the Triennial Review and the review process were discussed. The remaining time was spent discussing administrative and statutory requirements and reviewing documents. A tour of the City's Kalihi-Palama and Pearl City Bus Facilities was conducted to provide an overview of activities related to FTA-funded projects. A sample of maintenance records for FTA-funded vehicles and equipment was also examined during the site visit. Upon completion of the review, a summary of preliminary findings was provided to the City at an exit conference. The individuals participating in the review are listed in Section VI of this report.

3. Metrics

The metrics used to evaluate whether a grantee is meeting the requirements for each of the areas reviewed are:

- *Not Deficient*: An area is considered not deficient if, during the review, no findings were noted with the grantee's implementation of the requirements.
- *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 grantee does not conduct activities for which the requirements of the respective area would be applicable.

III. Grantee Description

Organization

The City consists of the Executive Branch, Legislative Branch, and semi-autonomous agencies. The Executive Branch consists of the Mayor's Office, which oversees the Managing Director's Office, the Culture and the Arts Office, the Economic Development Office, the Neighborhood Commission Office, the Office of Housing, and the Royal Hawaiian Band. There are 19 other departments under this branch including the Department of Transportation Services (DTS). There are four offices within the Legislative Branch including City Council, the City Clerk's Office, the Office of Council Services, and the Office of the Auditor. The Honolulu Authority for Rapid Transportation (HART) and the Honolulu Board of Water Supply fall under the semi-autonomous agencies.

DTS: DTS consists of four divisions: Public Transit, Traffic Engineering, Transportation Planning, and Traffic Signals and Technology. Public Transit is responsible for operating the public transit program, which includes TheBus and TheHandi-Van. Traffic Engineering is responsible for the operation of streets and intersections. They investigate traffic safety issues, conduct maintenance investigations, provide administration for traffic related projects, and conduct traffic safety campaigns. Transportation Planning is responsible for planning related to citywide transportation and coordination of Federal grants activities and Federal compliance. They conduct traffic surveys, respond to data queries, and review environmental assessments. Traffic Signals and Technology is responsible for the City's traffic signal systems, the Traffic Management Center, Street Use Permits, and the traffic camera system.

HART: HART was created in July 2011 as a semi-autonomous agency that is responsible for planning, constructing, operating, and extending the rail system in Honolulu. HART is currently working on creating a \$5.12 billion dollar elevated rapid transit line that will run 20 miles from Kapolei, near the University of Hawaii's West Oahu campus, to Ala Moana Center. The line will travel along southern Oahu via the Honolulu International Airport and the downtown area of the City. The project will also include the construction of 21 commuter stations including Aloha Stadium and Pearl Harbor. Per the Full Funding Grant Agreement (FFGA), the Revenue Service Date is January 31, 2020.

The agency consists of a 10-member board of directors, including three mayor-appointed members, three members who are selected by the Honolulu City Council, and the transportation directors for the city and state. The board chooses the ninth member from the community. The City's Director of Planning and Permitting serves as the tenth non-voting member.

Services

In the 1970s the City established by ordinance an instrumentality of the City, Oahu Transit Services, Inc. (OTS). OTS is the employer of record for all operating and maintenance personnel. The City also contracts for two positions (President and Vice President) for management of OTS. TheHandi-Van service is supplemented by two taxi cab companies under contract to OTS. There were no new routes or schedules placed in TheHandi-Van service since the prior review.

The City operates a fixed-route bus network of 100 routes. One bus route (40) operates service 24 hours per day 365 days per year. The remainder of daily bus service is provided weekdays from approximately 3:30 a.m. to 1:30 a.m. and Saturdays and Sundays from approximately 4:00 a.m. to 1:00 a.m. Complementary paratransit service is available during the same hours of operation as fixed route service. No new fixed route bus routes or schedules were placed in service since the prior review.

The basic adult fare for bus service is \$2.50. A reduced fare of \$1.00 is offered to seniors, persons with disabilities, and Medicare cardholders. Students are charged \$1.25. The City also has various pass programs.

The City operates a fleet of 519 buses for fixed-route service. The current peak requirement is for 433 vehicles. The City also owns a fleet of 160 small vehicles operated by OTS in TheHandi-Van service. The primary operations and maintenance facility, the Kalihi-Palama Bus Facility, is located in Honolulu. A second operating facility is in Pearl City. TheHandi-Van operations site is located next to the Kalihi-Palama Bus Facility. The City also has eight transit centers and six major park and ride lots. The City's administrative offices are located at 650 South King Street.

The City's National Transit Database Report for FY2013 provided the following financial and operating statistics for its fixed-route and paratransit service:

	Fixed-Route Service	Paratransit Service
Unlinked Passengers	69,242,214	841,447
Revenue Hours	1,310,605	366,795
Operating Expenses	\$179,780,320	\$34,031,310

Grant Activity

Below is a list of the City's open grants at the time of the review.

Grant Number	Grant Amount	Year Executed	Description
HI-03-0046-00	\$42,981	2010	Purchase buses & paratransit vehicles
HI-03-0047-04	\$493,954,941	2014	Honolulu Rail Transit Project FFGA
HI-04-0006-00	\$15,894	2010	Purchase paratransit vehicles
HI-04-0011-00	\$45,490	2012	State of Good Repair (SGR) 32 (40ft) Replacement Buses
HI-04-0015-00	\$5,000,000	2014	SGR 10 (60ft) Replacement Buses
HI-05-0206-00	\$1,887,657	2013	Bus Acquisition
HI-05-0207-00	\$1,949,267	2014	Bus Acquisition
HI-37-X002-01	\$311,000	2009	Purchase van, service and coordination
HI-37-X004-00	\$46,212	2010	Job Access Reverse Commute (JARC) service and coordination
HI-37-X005-00	\$261,737	2011	JARC service and coordination
HI-37-X007-00	\$472,298	2012	JARC service and coordination
HI-37-X009-00	\$382,402	2014	JARC service and coordination

Grant Number	Grant Amount	Year Executed	Description
HI-57-X004-00	\$11,432	2010	New Freedom service and coordination
HI-57-X005-00	\$137,015	2011	New Freedom service and coordination
HI-57-X007-00	\$161,281	2012	New Freedom service and coordination
HI-57-X009-00	\$247,682	2014	New Freedom service and coordination
HI-88-0001-00	\$5,061,000	2011	Transit Investments for Greenhouse Gas and Energy Reduction (TIGGER) II, 8-45' Hybrid Electric Buses
HI-90-X026-00	\$0	2012	Bus purchase, transit centers, Preventative Maintenance (PM)
HI-90-X030-00	\$366,275	2012	Bus PM, Bus Acquisition, and Transit Security
HI-90-X033-00	\$12,676,373	2013	Bus PM, Bus Acquisition, and Transit Security
HI-90-X034-00	\$2,436,118	2014	Bus PM & JARC
HI-96-X001-00	\$6,162,158	2009	Bus purchase, bus facilities

Completed Projects

During the last three years, the City completed the Alapai Transit Center and the Short Range Operations Plan. The City also completed the procurement of approximately 226 revenue vehicles comprised of 30'/40'/60' diesel buses, 40'/60' series hybrid buses and 25' paratransit vehicles.

Projects Underway

On-going projects include:

- Mobility Management - leveraging City funds combined with FTA Sections 5316 and 5317 grant funds to improve transit-related services to target populations of the City's Human Services Transportation Coordination Program.
- Agency-provided trips - providing City support that enables special needs day programs to operate transit services for their program participants, many of whom are subscription paratransit riders, thereby increasing the availability of spaces on paratransit vehicles for demand-response paratransit riders.
- Kalaeloa Shuttle - providing free shuttle service between homeless shelters and the Kapolei Transit Center.
- Bus-rail integration and transit-oriented development planning includes the re-deployment of buses and routing to align with the planned rail system; and transit oriented development planning for each station and its neighborhood to attract residents, visitors and workers.
- Electronic fare media system - developing an electronic fare medium system which would be used for both the rail and fixed route systems capable of capturing passenger data and information essential in operating and improving delivery of service.
- Paratransit reservations and dispatch practices - reviewing, analyzing and modifying to include revisions to policies related to no-show/late cancellations and the advance reservation window, along with initiating real-time scheduling.

- HART – On the island of Oahu, installing 20 miles of rail guide way from Kapolei to Ala Moana and designing and constructing 21 train stations from Kapolei to Ala Moana. The rail system is to be in service by January 2020.

Future Projects

In the next three to five years, the City plans to procure revenue vehicles to support the fixed route and paratransit service and complete the Honolulu Rail Transit project.

ARRA Projects

The City has one ARRA grant still active. FTA has provided an Office of Management and Budget (OMB) waiver, which allows the City to disburse all ARRA funds beyond the September 30, 2013 deadline as set forth in OMB's September 15, 2011 Memorandum 11-34, "Accelerating Spending of Remaining Funds from the American Recovery and Reinvestment Act for Discretionary Grant Programs". The statutory deadline of September 30, 2015 remains the final date that ARRA funds may be outlaid. The grant includes:

- Honolulu-High Capacity Transit Corridor Project: The ARRA-funded work includes preliminary engineering of the guideway and stations, sufficient to support the Environmental Impact Statement. This project is completed.
- TheBus and TheHandi-Van Acquisition Program: The ARRA-funded work includes the purchase of 19- 60' hybrid electric buses and 24- 60' hybrid articulated buses.
- Middle Street Intermodal Center: The ARRA-funded work includes construction of an interim park-and-ride facility consisting of 100 parking stalls. The project also includes construction of a security wall and fence along a portion of the perimeter. This interim park-and-ride facility has been in operation since October 2011 and will be in use until the planned 1,000 stall multi-level parking structure at the Middle Street Transit Center is completed.
- Bus Stop Pad Improvements Rehabilitation/Renovation: The ARRA-funded work includes the construction of concrete material bus pads at bus stops at various locations to strengthen the roadway. This replaces the asphalt material which is unable to hold up against the constant weight and stress from buses.
- Pearl City Bus Facility Parking Expansion: The ARRA-funded work at this existing bus maintenance facility includes relocation of the existing sound barrier perimeter fencing, installation of requisite lighting, and re-paving of portions of the lot.
- Wahiawa Transit Center: The ARRA-funded work includes the installation of four murals executed by local artists.

IV. Results of the Review

1. Financial Management and Capacity

Basic Requirement: The grantee must demonstrate the ability to match and manage FTA grant funds, cover cost increases and operating deficits, cover maintenance and operational costs for FTA funded facilities and equipment, and conduct and respond to applicable audits.

Finding: During this Triennial Review of the City, deficiencies were found with the FTA requirements for Financial Management and Capacity.

Insufficient financial capacity (7)

In light of recent project cost projections, HART's financial plan does not demonstrate sufficient financial capacity to complete the rail project as currently planned. General Excise Tax (GET) receipts are currently running four percent short of projections. HART's current Estimate at Completion (EAC) indicates that the project will exceed the FFGA budget unless HART receives extremely favorable bids on the remaining contract packages and continues implementing valid cost mitigation measures successfully. HART will be revising its financial plan based on the current cost projections, updated revenue forecast, and local funding increase decisions by the State Legislature and City Council to be made this spring.

ECHO documentation deficient (142)

During the review, DTS was unable to provide supporting documentation for selected ECHO transactions for grants HI-90-X026 and HI-90-X034.

Regarding ECHO deficiencies for grant HI-90-X026, DTS resubmitted email correspondence between itself and FTA addressing the reimbursement of \$1.027 million from this grant to resolve an overdraft issue from grant HI-04-0005. However, supporting documentation for the draw amount equaling \$1.027 million has not been provided.

Subsequent to the on-site review, DTS provided payroll records to support the ECHO sample selected for grant HI-90-X034. ECHO deficiencies related to this grant are now resolved.

Corrective Actions and Schedules:

- For the deficiency *insufficient financial capacity (7)*, by July 13, 2015, submit to the FTA regional office an updated financial plan, which identifies all funding sources for funding the HART project through completion, within the FFGA scope and budget.
- For the deficiency *ECHO documentation deficient (142)*, by April 30, 2015, submit to the FTA regional office the required documentation to support the DTS ECHO drawdown sample selected for grant HI-90-X026.

2. Technical Capacity

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

Finding: During this Triennial Review of the City, deficiencies resulting from the ERM conducted were found with the FTA requirements for Technical Capacity.

Enhanced Review Module

Progress reports lack required information (68) - Repeat deficiency from the 2012 Triennial Review

FTA Circular 5010.1D states, “The Milestone Progress Report (MPR) is the primary written communication between the grantee and FTA.” Furthermore, the circular requires that MPRs provide the FTA with such information as the current status of each activity line item (ALI) within the grant, a narrative description of problems encountered in project implementation, a detailed discussion of budget and schedule changes, revised estimated completion dates when original estimated completion dates are not met, and a detailed explanation of why scheduled milestones or completion dates were not met.

An examination of DTS’ active grants identified the following issues:

- The MPRs for nine grants (HI-03-0046, HI-04-0006, HI-04-0011, HI-37-X002, HI-37-X004, HI-37-X007, HI-57-X004, HI-90-X026 and HI-90-X030) were not updated to accurately reflect the status of projects. Although projects are still ongoing, the related milestones do not indicate expected completion dates. Out-of-date project milestones are one indication that a project has fallen behind schedule. This issue is the result of DTS not having procedures to verify the milestone dates and confirm the dates’ validity. DTS staff has been informed of the importance of providing accurate and up-to-date information in the MPRs.
- The MPRs for eleven grants (HI-04-0011, HI-37-X002, HI-37-X004, HI-57-X004, HI-57-X005, HI-57-X007, HI-88-0001, HI-90-X029, HI-90-X030, HI-90-X033 and HI-90-X034) lacked sufficient details in the project narrative on reasons for projects falling behind schedule. The narratives for these grants also lacked recovery plans explaining why each project was behind schedule, what remedies would be implemented by the grantee, and an updated project schedule.
- The fourth quarter MPRs for Section 5307 grants (HI-90-X026, HI-90-X029, HI-90-X030, HI-90-X033 and HI-90-X034) filed for FY2012, FY2013, and FY2014 did not contain the required associated transit improvement reports. In UZAs with a population of at least 200,000, the designated recipient or designated recipients must certify that no less than one percent of the fiscal year’s 5307 apportionment will be expended on associated transit improvements. The associated transit improvement reports filed as part of the fourth quarter MPRs for the grantees Section 5307 grants are to document the grantee’s expenditure of Section 5307 funds on associated transit improvements.

Untimely grant closeouts (79) - Repeat deficiency from the 2012 Triennial Review

According to the FTA grant award and management system, the last disbursement of funds for DTS grant HI-90-X026 was made on August 26, 2014, leaving a balance of \$0. The October 2014 Federal Financial Report (FFR) completed by the grantee also shows that there are no federal funds remaining, yet this grant remains open. FTA places a priority on closing out grants for which activity has ceased. FTA Circular 5010.1D states, "The grantee must initiate close-out of a grant when all approved activities are completed and/or applicable Federal funds expended. All close-out documentation must be submitted within 90 days of the completion of all activities in the grant."

Incorrect FFR reporting (122) - Repeat deficiency from the 2012 Triennial Review

According to the FTA grant award and management system, the October 2014 and January 2015 FFRs for three DTS grants (HI-05-0206, HI-05-0207 and HI-88-0001) reported \$0 in unliquidated obligations. The MPRs for these grants reported that contracts for the purchase of rolling stock had been awarded in the previous two quarters. The contract amount for these awards was not reflected on Line "I" as unliquidated obligations of the FFRs.

FFATA reporting deficiencies (175)

DTS has not been reporting awards exceeding \$25,000 to its subrecipients to the Federal Subaward Reporting System (FSRS) as required by the Federal Funding Accountability and Transparency Act of 2006 (FFATA). DTS awards JARC and New Freedom funds to subrecipients for the provision of service.

Corrective Actions and Schedules:

- For the deficiency *progress reports lack required information (68)*, DTS must perform the following:
 - By April 30, 2015, submit MPRs that include all missing information in the FTA grant award and management system.
 - By July 13, 2015, submit to the FTA regional office DTS procedures for ensuring that all required information is included in future reports.
- For the deficiency *untimely grant closeouts (79)*, by April 30, 2015, DTS must work with the FTA regional office to close the grant.
- For the deficiency *incorrect FFR reporting (122)*, DTS must perform the following:
 - By April 30, 2015, submit corrected FFRs in the FTA grant award and management system.
 - By July 13, 2015, submit to the FTA regional office DTS procedures for reconciling FFRs and MPRs and for validating FFR data.
- For the deficiency *FFATA reporting deficiencies (175)*, by July 13, 2015, DTS must perform the following:
 - Submit to the FTA regional office procedures for reporting future sub-awards to FSRS.
 - Notify the FTA regional office when DTS has reported subawards to FSRS.

3. Maintenance

Basic Requirement: Grantees and subrecipients must keep federally funded vehicles, equipment and facilities in good operating condition. Grantees and subrecipients must keep ADA accessibility features on all vehicles, equipment and facilities in good operating order.

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

4. Americans with Disabilities Act

Basic Requirement: Titles II and III of the Americans with Disabilities Act of 1990 (ADA) 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 the City, deficiencies resulting from the ERM conducted were found with the USDOT requirements for ADA.

Enhanced Review Module

Improper ADA complementary paratransit eligibility determination process (33)

The City contracts with Innovative Paradigms to operate TheHandi-Van Eligibility Center, which performs eligibility determinations for ADA complementary paratransit service. During the site visit, a sample of eligibility records from October and December 2014 was selected for review. There were seven instances where the eligibility letter was mailed after the twenty-one day requirement and two instances where the actual eligibility date was not included in the file. The City does not have documented oversight procedures to monitor Innovative Paradigms certification eligibility activities for the City's application processing times.

ADA Complementary Paratransit service deficiencies (73)

The City contracts the operations of the ADA complementary paratransit service to OTS. The City's published Community Access Routes (414, 501, 503, and 504) and OTS ADA Complimentary Paratransit Policies and Procedures currently describe route deviation as an amenity, allowing TheHandi-Van riders to request pickups via a circulator van. During the review, the City clarified the publications are erroneous; TheHandi-Van has not provided any paratransit trips through route deviation during the review period.

OTS ADA Complimentary Paratransit Policies and Procedures, TheHandi-Van's origin-to-destination policy, and public information states that passengers requiring door-to-door service from vehicle operators must provide advance notice of their need for the additional assistance. The DOT ADA regulatory requirement states that while it would be reasonable for the transit provider to ask for advance notice from the passenger of this need for assistance, if a passenger did not provide this notice, the transit provider would still need to make its best efforts to provide the needed assistance. OTS plans to update all sources of information to reflect the requirements.

Insufficient oversight of contractors for ADA complementary paratransit (650)

The City is responsible for ensuring that its ADA complementary paratransit service is operated without a pattern or practice of capacity constraints. 49 CFR 37.131(f)(3)(i)(A), (B) and (C) requires monitoring of each aspect of service provision, including denials, missed trips, untimely pickups for initial or return trips, and trip length.

In October 2014, OTS initiated Real-Time Scheduling, where the scheduling features of Trapeze were more fully utilized. OTS uses Trapeze to collect and report data on missed trips, on-time performance, and trip lengths. The City currently has no procedure to assess and monitor the results of the reports generated. During the review of records for December 2014, January 2015, and February 2015, on-time performance was reported at eighty-two percent. No goal has been established in the contract the City has with OTS, nor in the contracts that OTS has with its taxi providers. There is a ninety percent on-time performance goal in the City's recently completed Short Range Transit Service Operations Plan.

Corrective Actions and Schedules:

- For the deficiency *improper ADA complementary paratransit eligibility determination process (33)*, by June 12, 2015, the City must develop and submit to the FTA Region IX and X Civil Rights Officers its procedures for ensuring that the eligibility process of Innovative Paradigms meets the regulatory requirements for making eligibility determinations.
- For the deficiency *ADA Complementary Paratransit service deficiencies (73)*, by June 12, 2015, the City must submit to the FTA Region IX and X Civil Rights Officers:
 - Revised OTS ADA Complementary Paratransit Policies and Procedures that explicitly state that route deviation is not provided.
 - Revised OTS ADA Complimentary Paratransit Policies and Procedures to state that when advance notice for door-to-door service is not given, OTS will make its best efforts to provide the needed assistance.
- For the deficiency *insufficient oversight of contractors for ADA complementary paratransit (650)*,
 - By June 12, 2015, the City must develop and submit to the FTA Region IX and X Civil Rights Officer DTS interim procedures for ensuring OTS' and its taxi subcontractors' processes comply with the regulatory requirements for monitoring service provision.
 - By December 31, 2015, the City must submit to the FTA Region IX and X Civil Rights Officer final standards and monitoring procedures, along with evidence of its implementation for the months of October and November 2015.

5. Title VI

Basic Requirement: The grantee 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 grantee must ensure that federally supported transit services and related benefits are distributed in an equitable manner.

Note: The 2015 Triennial Review covers a three-year period in which the FTA issued a revised circular for Title VI, which provided more information on how to comply and changed requirements for some grantees with populations over 200,000. FTA Circular 4702.1B became effective October 1, 2012. Title VI programs submitted to FTA after this date must comply with the requirements of this circular. The Triennial Review will look at compliance with the requirement of FTA Circular 4702.1A for the period prior to October 1, 2012, and compliance with the revised circular for activities after this date.

Finding: During this Triennial Review of the City, deficiencies were found with the FTA requirements for Title VI.

Insufficient oversight of Title VI (62)

The City's subrecipient, Goodwill Industries, does not have a compliant Title VI program.

Inadequate written fare and service change equity analysis procedures (304)

The City has not developed written procedures for conducting fare and service equity analyses.

Corrective Actions and Schedules:

- For the deficiency *insufficient oversight of Title VI (62)*, by June 12, 2015, the City must submit to the FTA Region IX and X Civil Rights Officers:
 - Procedures for monitoring subrecipients for compliance with Title VI requirements.
 - An up-to-date subrecipient list.
 - The approved Goodwill Industries Title VI program.
- For the deficiency *inadequate written fare and service change equity analysis procedures (304)*, by December 15, 2015, the City must submit to the FTA Region IX and X Civil Rights Officers:
 - Policies for major service change, disparate impact, or disproportionate burden, along with procedures for implementing these policies.
 - Evidence of public engagement to develop the policies and procedures associated with fare and major service changes.
 - Evidence of board approval of applicable policies, procedures or equity analysis.

6. Procurement

Basic Requirement: Grantees use their own procurement procedures that reflect applicable state and local laws and regulations, provided that the process ensures competitive procurement and the procedures conform to applicable federal law, including 49 CFR Part 18 (specifically Section 18.36) and FTA Circular 4220.1F, "Third Party Contracting Guidance."

Finding: During this Triennial Review of the City, deficiencies resulting from the ERM conducted were found with the FTA requirements for Procurement.

Enhanced Review Module

Policies and procedures incomplete or out of date (22)

Policies and Procedures

FTA funded procurements for DTS are administered by the City and County Budget and Financial Services (BFS) Division of Purchasing. These procurements are guided by several policies and procedures that include: the Hawaii Revised Statutes (HRS), Hawaii Administrative Rule (HAR), City Procurement Policies (01.1 through 01.12), BFS Procurement Manual, Charter of Honolulu (including Chapter 3 of Article IX – Procurement and Disposition of Property and Article XI – Standards of Conduct), Honolulu General Instructions to Offerors, and Honolulu General Terms and Conditions. Subsequent to the City and County’s 2012 FTA Procurement System Review, City Procurement Policy 01.9 was replaced with Policy 01.12, Federally Funded Procurement, dated July 12, 2013. A review of these policies and procedures found that some FTA policies such as prohibition for tag-ons, prohibition of unreasonable requirements, requirement that grantee’s cost principles for evaluation of costs are consistent with Federal cost principles, and hiring preference for Veterans are not addressed. The lack of a comprehensive, succinct procurement guide and accompanying checklists contributed to deficiencies on BFS FTA-funded procurements conducted on behalf of DTS.

The latest revisions to HART’s procurement policies and procedures were approved February 2, 2015 by HART’s Project Director and HART’s Director of Quality Assurance and Quality Control. During the course of the Triennial Review site visit, HART made modifications to these procedures and drafted revisions in the areas of standards of conduct, revenue contracts, protest procedures, and procurement record keeping, which will be submitted for internal review and approval. HART also updated accompanying procurement file checklists. These revisions, once approved, address required items of FTA Circular 4220.1F.

The basis for many procurement policies for HART and BFS is the HAR and the HRS; however, BFS and HART treat some of the local policies differently in their procurement policies used for FTA funded procurements. Examples of these are the inclusion of bid price preferences for being party to an apprenticeship agreement registered with the State of Hawaii, Department of Labor and Industrial Relations and the acceptance of campaign contributions in standards of conduct policies. Additionally, HART has recently revised its protest procedures to make bidders aware of their right to appeal protests to FTA, but BFS’ policy differs. Because interpretation of local and other requirements when procuring with FTA funds should be consistent among entities within one grantee, the policies and procedures of BFS and HART should be reviewed and appropriately aligned. Additionally, procurement processes should address identification mechanisms for contracts such that FTA funded procurements are clearly and readily distinguished from non-FTA funded procurements.

Subsequent to the site visit, HART provided the FTA regional office with a list of projected procurements for the next six months.

Contracting

For a HART construction project, HART issued a request for bids in December 2013. All five bidders were deemed non-responsive due to various issues relating to state licensing requirements. Because of this, HART cancelled the solicitation via an addendum. A protest was filed by one of the bidders regarding the rejection of its bid. During the bid protest, HART reconsidered some of the basis for rejection of responses. HART concluded that its reconsideration resulted in having two responsive bidders from the initial five bids. It then issued an addendum rescinding the solicitation cancellation and providing notification of award of the contract to the second lowest bidder, who was determined to be the lowest priced responsive and responsible bidder. The initial low bidder filed an award protest; however HART denied this protest because it determined that this bidder did not have standing to protest the award, as it should have filed its protest within five days of its initial bid being rejected and that it listed the incorrect trade name of the contractor that held one of the licenses it listed.

The aforementioned processes implemented by HART of rescinding a contract cancellation through a solicitation amendment and challenging the standing of a bidder to protest an award is not clearly delineated in HART's procurement procedures or its bid documents.

For a BFS procurement of 40' transit vehicles, awarded in October 2013, an evaluation criterion with point values was provided in the request for proposals. The point value for price was repeated on the pricing sheet submitted by bidders. However, the evaluation sheet used to score the proposals differed in both categories and point values. BFS' procedures did not clearly delineate that the evaluation criterion used during the solicitation process must be used during the evaluation process and the circumstances under which there may be exceptions.

No verification that excluded parties are not participating (183)

BFS has a policy regarding verification through SAM.gov that excluded parties are not participating in FTA-funded contracts. However, documentation of conducting this search was not provided for the BFS-led procurements reviewed. Prior to the exit conference, BFS did confirm that SAM.gov was checked and that neither of the bidders for the contracts reviewed was suspended or debarred.

Improper use of options (302)

BFS awarded a contract for up to 32 40' transit buses in October 2013, with an option for an additional 32 40' transit buses. Neither the request for or evaluation of proposals demonstrated that option prices were factored into the price evaluation. After the base order, BFS exercised an option for 20 buses; however there was no evidence that BFS determined that the option price was better than prices available in the market prior to exercising the option.

Responsibility determination deficiencies (344)

BFS has a policy for conducting responsibility determinations prior to award, however documentation that this policy was followed was not provided for the procurements reviewed.

Corrective Actions and Schedules:

- For the deficiency, *policies and procedures incomplete or out of date (22)*, perform the following:
 - By May 13, 2015, provide the FTA regional office with a list of projected DTS procurements for the next six months.
 - By July 13, 2015, submit to the FTA regional office revised DTS and HART procurement procedures that address all FTA requirements and consistently interpret local requirements for procurement of FTA funded goods and services.
 - By July 13, 2015, submit to the FTA regional office revised HART procurement procedures that clearly address all components of the procurement process, including procedures for rescinding bid cancellations, and clarification of interested parties for purposes of protests of awards and timeliness of protests of awards.
 - By July 13, 2015, submit to the FTA regional office revised DTS procedures that ensure all FTA funded contract awards identify the evaluation factors and indicate the relative importance that each has towards the award as stated in the competitive proposals/request for proposal and that these criteria are used.
- For the deficiency, *no verification that excluded parties are not participating (183)*, perform the following:
 - By July 13, 2015, submit to the FTA regional office procedures to search SAM.gov during the DTS procurement process before entering into applicable transactions and to maintain documentation of the search in the procurement file.
 - By July 13, 2015, submit to the FTA regional office documentation that DTS has implemented the required procedures for the next applicable federally funded procurement.
- For the deficiency, *improper use of options (302)*, perform the following:
 - By July 13, 2015, develop and submit to the FTA regional office procedures to ensure that DTS complies with FTA requirements for evaluating and exercising options.
- For the deficiency, *responsibility determination deficiencies (344)*, perform the following:
 - By July 13, 2015, submit to the FTA regional office a process to ensure that DTS documents adequate responsibility determinations prior to award of FTA funded contracts.
 - For the next federally funded procurement and by July 13, 2015, submit to the FTA regional office documentation that the required responsibility determination process was implemented.

7. Disadvantaged Business Enterprise

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

Finding: During this Triennial Review of the City, a deficiency was found with the USDOT requirements for DBE.

Other - ARRA quarterly reports were not submitted timely (365)

The City has not submitted any of the required quarterly ARRA reports.

Corrective Actions and Schedule:

- For the deficiency *Other - ARRA quarterly reports were not submitted timely (365)*, by May 13, 2015, perform the following:
 - Develop and submit to the FTA Region IX and X Civil Rights Officers DTS procedures to ensure that future ARRA reports will be submitted quarterly.
 - Notify the FTA Region IX and X Civil Rights Officers when missing reports have been uploaded to the FTA grant award and management system.

8. Legal

Basic Requirement: The grantee must be eligible and authorized under state and local law to request, receive, and dispense FTA funds and to execute and administer FTA funded projects. The authority to take actions and responsibility on behalf of the grantee must be properly delegated and executed. Grantees must comply with Restrictions on Lobbying requirements.

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

9. Satisfactory Continuing Control

Basic Requirement: The grantee must ensure that FTA-funded property will remain available to be used for its originally authorized purpose throughout its useful life until disposition.

Finding: During this Triennial Review of the City, deficiencies were found with the FTA requirements for Satisfactory Continuing Control.

Inadequate equipment records (58)

The City's equipment records for FTA-funded equipment do not indicate vested title.

Lacking excess real property utilization inventory /plan out of date (84)

The City's FTA-funded property, the Halawa Bus Maintenance facility, is not being used for its intended purpose. The City has not yet prepared a written excess property inventory and utilization plan.

Corrective Actions and Schedules:

- For the deficiency *inadequate equipment records (58)*, by October 12, 2015, submit to the FTA regional office updated DTS equipment records that contain all required information.
- For the deficiency *lacking excess real property utilization inventory/plan out of date (84)*, by July 13, 2015, submit to the FTA regional office an excess real property utilization plan for DTS.

10. Planning/Program of Projects

Basic Requirement: The grantee must participate in the transportation planning process in accordance with FTA requirements, MAP-21, and the metropolitan and statewide planning regulations. Each recipient of a Section 5307 grant shall develop, publish, afford an opportunity for a public hearing on, and submit for approval, a program of projects (POP).

Finding: During this Triennial Review of the City, a deficiency was found with the FTA requirements for Planning/POP.

Elements missing in POP public participation procedures (55)

The City uses their Metropolitan Planning Organization (MPO)'s public involvement process for the Transportation Improvement Plan (TIP) to meet public involvement requirements for the POP. The MPO's public participation plan does not state that the MPO's public participation process for the TIP is used to satisfy the City's public participation process for the POP.

Corrective Actions and Schedule:

- For the deficiency *elements missing in POP public participation procedures (55)*, by July 13, 2015, submit to the FTA regional office:
 - A revised MPO public participation plan for the TIP that contains the missing elements.
 - Procedures to ensure that the MPO public participation plan for the TIP continues to include the required elements with every update cycle.

11. Public Comment on Fare Increases and Major Service Reductions

Basic Requirement: Section 5307 grantees 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.

Finding: During this Triennial Review of the City, no deficiencies were found with the FTA requirements for Public Comment on Fare Increases and Major Service Reductions.

12. Half Fare

Basic Requirement: For fixed route service supported with Section 5307 assistance, fares charged elderly persons, 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 the City, no deficiencies were found with the FTA requirements for Half Fare.

13. Charter Bus

Basic Requirement: Grantees are prohibited from using federally funded equipment and facilities to provide charter service if a registered private charter operator expresses interest in providing the service. Grantees are allowed to operate community based charter services excepted under the regulations.

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

14. School Bus

Basic Requirement: Grantees are prohibited from providing exclusive school bus service unless the service qualifies and is approved by the FTA Administrator under an allowable exemption. Federally funded equipment or facilities cannot be used to provide exclusive school bus service. School tripper service that operates and looks like all other regular service is allowed.

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

15. Security

Basic Requirement: As recipients of Section 5307 funds, grantees must annually certify that they are spending at least one percent of such funds for transit security projects or that such expenditures for security systems are not necessary.

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

16. Drug Free Workplace and Drug and Alcohol Program

Basic Requirement: All grantees are required to maintain a drug-free workplace for all transit-related employees and to have an ongoing drug-free awareness program. Grantees receiving Section 5307, 5309 or 5311 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 the City, no deficiencies were found with the FTA requirements for Drug-Free Workplace and Drug and Alcohol Program.

17. Equal Employment Opportunity

Basic Requirement: The grantee 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. (Note: EEOC's regulation only identifies/recognizes religion and not creed as one of the protected groups.)

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

Employment practices analyses deficiencies (520)

The City has not conducted a detailed narrative and statistical assessment of present employment practices to identify those practices that operate as employment barriers and unjustifiably contribute to underutilization.

Corrective Actions and Schedule:

- For the deficiency *employment practices analyses deficiencies (520)*, by May 13, 2015, submit to the FTA Region IX and X Civil Rights Officers:
 - A detailed narrative assessment that describes the agency's current procedures for hiring, recruitment, promotions, terminations, training, tests (if any), seniority practices and disciplinary actions.
 - A statistical assessment of hires, promotions, terminations and disciplinary actions.

V. Summary of Findings

Review Area	Finding	Deficiency	Corrective Action	Response Date	Date Closed
1. Financial Management and Capacity	D-7	Insufficient financial capacity	Submit to the FTA regional office an updated financial plan, which identifies all funding sources for funding the HART project through completion, within the FFGA scope and budget.	July 13, 2015	
	D-142	ECHO documentation deficient	Submit to the FTA regional office the required documentation to support the DTS ECHO drawdown sample selected for grant HI-90-X026.	April 30, 2015	
2. Technical Capacity	D-68	Progress reports lack required information (<i>repeat</i>)	Submit MPRs that include all missing information in the FTA grant award and management system.	April 30, 2015	
			Submit to the FTA regional office DTS procedures for ensuring that all required information is included in future reports.	July 13, 2015	
	D-79	Untimely grant closeouts (<i>repeat</i>)	DTS must work with the FTA regional office to close the grant.	April 30, 2015	
	D-122	Incorrect FFR reporting (<i>repeat</i>)	Submit corrected FFRs in the FTA grant award and management system.	April 30, 2015	
			Submit to the FTA regional office DTS procedures for reconciling FFRs and MPRs and for validating FFR data.	July 13, 2015	
	D-175	FFATA reporting deficiencies	Submit to the FTA regional office procedures for reporting future sub-awards to FSRS.	July 13, 2015	
Notify the FTA regional office when DTS has reported subawards to FSRS.			July 13, 2015		
3. Maintenance	ND				
4. ADA	D-33	Improper ADA complementary paratransit eligibility determination process	Develop and submit to the FTA Region IX and X Civil Rights Officers the City's procedures for ensuring that the eligibility process of Innovative Paradigms meets the regulatory requirements for making eligibility determinations.	June 12, 2015	
	D-73	ADA Complementary Paratransit service deficiencies	Submit to the FTA Region IX and X Civil Rights Officers the City's revised OTS ADA Complementary Paratransit Policies and Procedures that explicitly state that route deviation is not provided.	June 12, 2015	

Review Area	Finding	Deficiency	Corrective Action	Response Date	Date Closed
			Submit to the FTA Region IX and X Civil Rights Officers the City's revised OTS ADA Complimentary Paratransit Policies and Procedures to state that when advance notice for door-to-door service is not given, OTS will make its best efforts to provide the needed assistance.	June 12, 2015	
	D-650	Insufficient oversight of contractors for ADA complementary paratransit	Develop and submit to the FTA Region IX and X Civil Rights Officers DTS interim procedures for ensuring OTS' and its taxi subcontractors' processes comply with the regulatory requirements for monitoring service provision.	June 12, 2015	
			Submit to the FTA Region IX and X Civil Rights Officer final standards and monitoring procedures, along with evidence of its implementation for the months of October and November, 2015.	December 31, 2015	
5. Title VI	D-62	Insufficient oversight of Title VI	Submit to the FTA Region IX and X Civil Rights Officers procedures for monitoring subrecipients for compliance with Title VI requirements.	June 12, 2015	
			Submit to the FTA Region IX and X Civil Rights Officers an up-to-date subrecipient list.	June 12, 2015	
			Submit to the FTA Region IX and X Civil Rights Officers the approved Goodwill Industries Title VI program	June 12, 2015	
	D-304	Inadequate written fare and service change equity analysis procedures	Submit to the FTA Region IX and X Civil Rights Officers policies for major service change, disparate impact, or disproportionate burden, along with procedures for implementing these policies.	December 15, 2015	
			Submit to the FTA Region IX and X Civil Rights Officers evidence of public engagement to develop the policies and procedures associated with fare and major service changes.	December 15, 2015	
			Submit to the FTA Region IX and X Civil Rights Officers evidence of board approval of applicable policies, procedures or equity analysis.	December 15, 2015	

Review Area	Finding	Deficiency	Corrective Action	Response Date	Date Closed
6. Procurement	D-22	Policies and procedures incomplete or out of date	Provide the FTA regional office with a list of projected DTS procurements for the next six months.	May 13, 2015	
			Submit to the FTA regional office revised DTS and HART procurement procedures that address all FTA requirements and consistently interpret local requirements for procurement of FTA funded goods and services.	July 13, 2015	
			Submit to the FTA regional office revised HART procurement procedures that clearly addresses all components of the procurement process, including procedures for rescinding bid cancellations, and clarification of interested parties for purposes of protests of awards and timeliness of protests of awards.	July 13, 2015	
			Submit to the FTA regional office revised DTS procedures that ensure all FTA funded contract awards identify the evaluation factors and indicate the relative importance that each has towards the award as stated in the competitive proposals/request for proposal and that these criteria are used.	July 13, 2015	
	D-183	No verification that excluded parties are not participating	Submit to the FTA regional office procedures to search SAM.gov during the DTS procurement process before entering into applicable transactions and to maintain documentation of the search in the procurement file.	July 13, 2015	
			Submit to the FTA regional office documentation that DTS has implemented the required procedures for the next applicable federally funded procurement.	July 13, 2015	
	D-302	Improper use of options	Develop and submit to the FTA regional office procedures to ensure that DTS complies with FTA requirements for evaluating and exercising options.	July 13, 2015	
	D-344	Responsibility determination deficiencies	Submit to the FTA regional office a process to ensure that DTS documents adequate responsibility determinations prior to award of FTA funded contracts.	July 13, 2015	
			For the next federally funded procurement, submit to the FTA regional office documentation that the required responsibility determination process was implemented.	July 13, 2015	

Review Area	Finding	Deficiency	Corrective Action	Response Date	Date Closed
7. DBE	D-365	Other - ARRA quarterly reports were not submitted timely	Develop and submit to the FTA Region IX and X Civil Rights Officers DTS procedures to ensure that future ARRA reports will be submitted quarterly.	May 13, 2015	
			Notify the FTA Region IX and X Civil Rights Officers when missing reports have been uploaded to the FTA grant award and management system.	May 13, 2015	
8. Legal	ND				
9. Satisfactory Continuing Control	D-58	Inadequate equipment records	Submit to the FTA regional office updated DTS equipment records that contain all required information.	October 12, 2015	
	D-84	Lacking excess real property utilization inventory/plan out of date	Submit to the FTA regional office an excess real property utilization plan for DTS.	July 13, 2015	
10. Planning/ POP	D-55	Elements missing in POP public participation procedures	Submit to the FTA regional office a revised MPO public participation plan for the TIP that contains the missing elements.	July 13, 2015	
			Submit to the FTA regional office procedures to ensure that the MPO public participation plan for the TIP continues to include the required elements with every update cycle.	July 13, 2015	
11. Public Comment on Fare Increase and Major Service Reductions	ND				
12. Half Fare	ND				
13. Charter Bus	ND				
14. School Bus	ND				
15. Security	ND				
16. Drug-Free Workplace/ Drug and Alcohol Program	ND				
17. EEO	D-520	Employment practices analyses deficiencies	Submit to the FTA Region IX and X Civil Rights Officers a detailed narrative assessment that describes the agency's current procedures for hiring, recruitment, promotions, terminations, training, tests (if any), seniority practices and disciplinary actions.	May 13, 2015	
			Submit to the FTA Region IX and X Civil Rights Officers a statistical assessment of hires, promotions, terminations and disciplinary actions.	May 13, 2015	

VI. Attendees

Name	Title	Phone Number	E-mail Address
City and County of Honolulu			
<i>Department of Transportation Services (DTS)</i>			
Michael D. Formby	Director	808-768-8301	mformby@honolulu.gov
Mark Au	Federal Compliance Branch Chief	808-768-8346	mau@honolulu.gov
Mark N. Garrity	Deputy Director	808-768-8304	mgarrity@honolulu.gov
Kellie Saiki	Internal Control Analyst	808-768-8314	ksaiki@honolulu.gov
Michael D. Richards	Fiscal Officer	808-683-2465	mrichards@honolulu.gov
Rowena Santamaria	Fiscal Accountant	808-768-8640	rsantamaria@honolulu.gov
Dong Hwan Kim	Fiscal Accountant	808-768-8633	dkim4@honolulu.gov
Ann Sakurao	Fiscal Officer	808-768-8637	asakurao@honolulu.gov
Glenn Moir	PTD Planner	808-768-3700	gmoir@honolulu.gov
Michael Hiu	Assistant Purchasing Administrator	808-768-3940	mhiu@honolulu.gov
Gerald Hieda	Facilities & Equipment Branch Chief	808-768-8376	ghieda@honolulu.gov
Strather Ing	FTA Grant Administrator/POC	808-768-8348	sing@honolulu.gov
Kahrisha Lawas	Planner	808-768-8382	klawas@honolulu.gov
Sandra Abelaye	Fixed Route Operations Branch Chief	808-768-8371	sabelaye@honolulu.gov
Scott Ishiyama	Paratransit Operations Branch Chief	808-768-8380	sishiyama@honolulu.gov
Don Hamada	Transportation Planning Division Chief	808-768-3810	dhamada@honolulu.gov
Jackie Shen	TPD Planner	808-768-5462	jshen@honolulu.gov
Eileen Mark	Chief	808-768-8379	emark@honolulu.gov
Wayne Tomita	Facilities and Equipment	808-768-8378	wtomita@honolulu.gov
Eric Stoetzer	Planner	808-768-8362	estoetzer@honolulu.gov
Geri Ung	Planner-	808-768-8381	gung@honolulu.gov
Jose Rodriguez	Planner	808-768-8372	jrodriguez1@honolulu.gov
Yoko Tomita	Planner	808-768-8374	ytomita@honolulu.gov
Coreen Blanco	Facilities and Equipment	808-768-8375	cblanco@honolulu.gov
<i>Honolulu Authority for Rapid Transportation (HART)</i>			
Daniel Grabauskas	Executive Director and CEO	808-768-6146	dgrabauskas@honolulu.gov
Brennon Morioka	Deputy Executive Director	808-768-6186	bmorioka@honolulu.gov
Nicole Chapman	Director, Procurements & Contracts	808-768-6135	nchapman@honolulu.gov

Name	Title	Phone Number	E-mail Address
Brian Kelleher	Director, Contract Administration	808-768-6158	bkelleher@honolulu.gov
Lorenzo Garrido	Director, Design & Construction	808-768-6191	lgarrido@honolulu.gov
David Conover	Deputy Director, Design & Construction	808-292-1478	dconover@honolulu.gov
Wes Mott	Advisor, Procurement & B&F	808-768-6155	wmott@honolulu.gov
Paul Romaine	Administrative Services Officer	808-768-6184	promaine@honolulu.gov
Diane Arakaki	Chief Financial Officer	808-768-6156	darakaki@honolulu.gov
Charles Bayne	Civil Rights Officer	808-768-6223	cbayne@honolulu.gov
Corey Ellis	Deputy Project Controls Manager	808-768-6150	cellis@honolulu.gov
Morris Atta	Deputy Director Right-of-Way	808-768-6250	matta@honolulu.gov
Kelsey Dorogi	Planner	808-768-6209	kdorogi@honolulu.gov
Kate Froemming	Grants Manager	808-768-6185	kfroemming@honolulu.gov
Bruce Sakihama	Fiscal Officer	808-768-6247	bsakihama@honolulu.gov
Liz Scanlon	Director of Planning Permitting & ROW	808-768-6236	escanlon@honolulu.gov
<i>Oahu Transit Services (OTS)</i>			
Roger Morton	President and General Manager	808-8484508	roger.morton@thebus.org
Ralph Faufata	Vice President, Transportation	808-8484559	ralph.faufata@thebus.org
Ramona Silva	Director of Operations Paratransit Services	808-454-5085	ramona.silva@thebus.org
John Black	Vice President Paratransit Services	808-454-5041	john.black@thebus.org
Leah Calixto	Manager of Service Delivery, Paratransit Services	808-454-5010	leah.calixto@thebus.org
Angela Lo	Civil Rights Compliance Officer	808-8484585	angela.lo@thebus.org
Charles Lee	Manager, Para-transit Maintenance	808-454-5075	charles.lee@thebus.org
Brent Sarria	Manager, Facilities and Plant Maintenance	808-848-4443	brent.sarria@thebus.org
Richard deRego	Supt., Kalihi Division	808-848-4451	rderego@thebus.org
Herb Barboza	Vice President of Maintenance	808-848-4448	hbarboza@thebus.org
Eugene Oyadomari	Supt., URF	808-848-4572	eoyadomari@thebus.org

Name	Title	Phone Number	E-mail Address
Daniel Ahuna	Supt of Maintenance Pearl City Facility	808-484-7731	daniel.ahuna@thebus.org
Franklin Butcher	Assistant Supt. Of Maint. Pearl City Facility	808-484-7743	franklin.butcher@thebus.org
Mike Onouye	Technician Equipment Coordinator	808-848-4441	mike.onouye@thebus.org
Adam Tamayoshi	Staff Engineer	808-848-4487	adam.tamayoshi@thebus.org
Pamela Gordon	HVEC	808-538-0033	pamelag@theeligibilitycenter.org
Contractors			
Richard Doyle	HART Consultant	781-850-6467	doyletransportation@gmail.com
Phil McGuire	Innovative Paradigms	707-318-3646	philm@innovativeparadigms.com
FTA (via teleconference)			
Leslie Rogers	Regional Administrator	415-744-3133	Leslie.Rogers@dot.gov
Edward Carranza, Jr	Deputy Regional Administrator	415-744-2741	Edward.Carranza@dot.gov
Bernardo Bustamante	Director of Program Management and Oversight	415-744-3113	Bernardo.Bustamante@dot.gov
Catherine Luu	General Engineer	415-744-2730	Catherine.Luu@dot.gov
Derrin Jourdan	Region IX Civil Rights Officer	415-744-2729	Derrin.Jourdan@dot.gov
Christopher MacNeith	Region X Civil Rights Officer	206-220-4462	Christopher.MacNeith@dot.gov
Matthew Butner	Transportation Program Specialist	415-744-0119	Matthew.Butner@dot.gov
Milligan & Company, LLC			
Jim Buckley	Lead Reviewer	410-404-7443	jbuckley@milligancpa.com
Denise Bailey	Procurement SME	215-496-9100	dbailey@milligancpa.com
Charles Walker	Technical Capacity SME	215-496-9100	cwalker@milligancpa.com
Ketnah Parchment	Assist Reviewer	215-496-9100	kparchment@milligancpa.com
Anthony Chantharath	Assist Reviewer	215-496-9100	achantharath@milligancpa.com

VII. Appendices

No appendices included in this report.

Department of Transportation Services' Responses by Review Areas

Financial Management and Capacity

**FY 2015 Triennial Review Final Report
Corrective Actions to Review Findings**

Review Area: Financial Management and Capacity

Finding/Deficiency: D-142 – ECHO documentation deficient

Corrective Action: Submit to the FTA regional office the required documentation to support the DTS ECHO drawdown sample selected for grant HI-90-X026.

Action Taken: Honolulu drew down through ECHO and at the same time submitted a budget revision for grant HI-04-0005. Drawdown: \$112,386 (from Grant HI-04-0005) and \$1,027,000 (from Grant: HI-90-X026).

After completing all steps above, Honolulu submitted a request for grant close out (HI-04-0005) which states the grant is completed, and requested closing out the grant. (note there will be \$0 unliquidated balance since your draw down \$112,386 from step 5 above)

The only documentation available is the email copy provided to the Triennial Review Team, a copy of which follows:

From: Hamada, Don [mailto:dhamada@honolulu.gov]
Sent: Monday, June 24, 2013 1:04 PM
To: Luu, Catherine (FTA)
Cc: Bredehoft, Audrey (FTA); Bustamante, Bernardo (FTA); Sakurao, Ann; Kim, Donghwan; Kira, Wesley; Ing, Strather D.; Au, Mark
Subject: RE: HI-04-0005 Intermodal Center Overdrawn Issue

Hj, Catherine: our responses are below. Overdrawn spreadsheet and completion report are attached. Thanks, Don.

Responses to Catherine's Questions:

1. *"The final cost of the project or grant?"*

DTS Response: Final Total Eligible Cost is \$6,624,114 fed + \$7,551,697 local = \$14,175,811. This number will be updated

in TEAM FFR.

2. *"The final completion date of the grant activity or project?"*

DTS Response: Contract Completed on Jan 31, 2011 as reported in TEAM Milestone Report.

3. *"A report and photo of the project that demonstrates the scope of the project/grant is completed via email."*

DTS Response: Project Completion Report attached.

4. *"Because the grant (HI-04-0005) is complete, but grant HI-90-X026, ALI 11.33.03 states that the funds requested in this grant will supplement the funds in application HI-04-0005. Let me know what is your plan with the ALI 11.33.03, Grant HI-90-X026."*

DTS Response: As a priority, we certainly would appreciate if the (HI-90-X026 ALI 11.33.03) funds could in some way be applied to the overdraw issue since we are significantly below the maximum 80/20 % match. Second priority would be to request redirecting the ALI 11.33.03 Middle St funds to another ALI within the same grant, ALI 11.7A.00 Bus Preventative Maintenance, by revising the grant and perhaps using those funds as a return-amount in ECHO. (As a note, during the time when the bids went out for the Middle Street Intermodal Center, Hawaii's economy was also in recession and bids were coming in much lower than expected.)

Technical Capacity

**FY 2015 Triennial Review Final Report
Corrective Actions to Review Findings**

Review Area:	Technical Capacity
Finding/Deficiency:	D-68 – Progress reports lack required information (repeat)
Corrective Action:	Submit Milestone Progress Reports (MPRs) that include all missing information in the FTA grant award and management system.
Action Taken:	As of April 29, 2015, Public Transit Division (PTD) project managers reviewed the MPRs for the active FTA grants administered by the Department of Transportation Services, and have updated project milestones and inserted missing information, including the associated transit improvement reports for FFYs 2012, 2013 and 2014. The revisions are being incorporated as part of the City's 2 nd Quarter MPRs, also due to the FTA on April 30, 2015. The final revisions to the MPRs will be uploaded and available for review on TEAM by COB April 30, 2015.

**FY 2015 Triennial Review Final Report
Corrective Action From**

Review Area:	2. Technical Capacity
Deficiency:	D-68 - Part 2, Progress reports lack required information (repeat)
Corrective Action:	Submit to the FTA regional office DTS procedures for ensuring that all required information is included in future reports.
Action Taken:	DTS procedures for preparing quarterly reports on FTA grant progress are attached.

**Transportation Planning Division
Department of Transportation Services**

Category: Federal Grant Management	Index Code: 4-6.7 Page 1 of 2
Subject: Quarterly Grant Reports, Federal Transit Administration (FTA)	
Reference: FTA Circular 5010.1C, Grant Management Guidelines, dated 10/1/98, as may be amended from time to time.	
Purpose: To establish a procedure to submit the quarter progress and financial status reports required by FTA Circular 5010.1C, as may be amended from time to time. Procedures: <ol style="list-style-type: none">1. Within 10 working days following the end of each quarter, i.e. March 31st, June 30th, September 30th, and December 31st, affected departmental units will submit the following data required by FTA to TPD:<ol style="list-style-type: none">a. Address each activity line item (projects) within the approved grant.b. Include a discussion of all budget or schedule changes.c. For each milestone, include revised estimated completion date(s) and the actual completion date.d. Provide the dates of expected or actual requests for bid, delivery, etc.e. Provide a narrative description of projects, status, specification preparation, bid solicitation, resolution of protests, and contract awards.f. Analyze significant project cost variances. Completion and acceptance of equipment and construction or other work should be discussed, together with a breakout of the costs incurred and those costs required to complete the project. Use quantitative measures, such as hours worked, sections completed or units delivered.g. Include reasons why any scheduled milestones or completion dates were not met, identifying problem areas and discussing how the problems will be solved. Discuss the expected impacts of delays and the steps planned to minimize these impacts.h. Provide a list of all outstanding claims exceeding \$100,000, and all claims settled during the reporting period. This list should be accompanied by a brief description, estimated costs, and the reasons for the claims.i. Include a list of all change orders and amounts exceeding \$100,000, pending or settled, during the reporting period. This list should be accompanied by a brief description.	

Category:

Index Code: 4-6.7

Page 2 of 2

Federal Compliance

2. The Department of Budget and Fiscal Services' Fiscal Services Branch (Fiscal) will be responsible to prepare the Financial Status Report (FSR). Draft FSRs for each active grant and a detailed report supporting the draft FSRs are due to TPD on the 20th day following the end of the quarter.
3. TPD will be responsible to check the consistency of each project's narrative progress with the financial information.
4. TPD will inform the responsible Fiscal accountant to finalize the FSRs on Federal Standard Form 269A (which has been modified to accommodate the Fiscal Officer's signature the "recommend approval" signature block), and submit the signed copies to TPD.
5. TPD will input the progress and milestone information into FTA's Transportation Electronic Award and Management (TEAM) system. TPD will coordinate the input of the financial information with Fiscal.
6. TPD will print a draft report for the Director's review and approval. Quarterly reports are due to FTA by the 30th day following the end of each quarter.
7. TPD will submit the quarterly reports via TEAM after the Director's approval.
8. TPD will distribute copies of the approved quarterly reports to Fiscal and the affected departmental units.
9. TPD will distribute worksheets for the upcoming quarterly reports to the affected departmental units by the end of each quarter.

ADOPTED:

Ceryle D. Soon
CHERYLE D. SOON

Amendment _____

Date 2/17/04

Date _____

**FY 2015 Triennial Review Final Report
Corrective Actions to Review Findings**

Review Area:	Technical Capacity
Deficiency:	D-79 – Untimely grant closeouts (repeat)
Corrective Action:	DTS must work with the FTA regional office to close the grant.
Action Taken:	Closeout of HI-37-X002-01, HI-90-X026, and HI-04-0011 by COB April 30, 2015.

**FY 2015 Triennial Review Final Report
Corrective Actions to Review Findings**

Review Area:	Technical Capacity
Finding/Deficiency:	D-122 – Incorrect FFR reporting (repeat)
Corrective Action:	Submit corrected FFRs in the FTA grant award and management system.
Action Taken:	The corrected FFR will be uploaded and available for review on TEAM by COB April 30, 2015.

**FY 2015 Triennial Review Final Report
Corrective Action Form**

Review Area: 2. Technical Capacity

Deficiency: D-122 - Part 2, Incorrect FFR reporting (repeat)

Corrective Action: Submit to the FTA regional office DTS procedures for reconciling FFRs and MPRs and for validating FFR data.

Action Taken: DTS procedures are attached.

**Transportation Planning Division
Department of Transportation Services**

Category:	Index Code: 4-6.7 Page 1 of 2
Federal Grant Management	
Subject:	
Quarterly Grant Reports, Federal Transit Administration (FTA)	
Reference:	
FTA Circular 5010.1C, Grant Management Guidelines, dated 10/1/98, as may be amended from time to time.	
Purpose:	
To establish a procedure to submit the quarter progress and financial status reports required by FTA Circular 5010.1C, as may be amended from time to time.	
Procedures:	
1. Within 10 working days following the end of each quarter, i.e. March 31 st , June 30 th , September 30 th , and December 31 st , affected departmental units will submit the following data required by FTA to TPD:	
a. Address each activity line item (projects) within the approved grant.	
b. Include a discussion of all budget or schedule changes.	
c. For each milestone, include revised estimated completion date(s) and the actual completion date.	
d. Provide the dates of expected or actual requests for bid, delivery, etc.	
e. Provide a narrative description of projects, status, specification preparation, bid solicitation, resolution of protests, and contract awards.	
f. Analyze significant project cost variances. Completion and acceptance of equipment and construction or other work should be discussed, together with a breakout of the costs incurred and those costs required to complete the project. Use quantitative measures, such as hours worked, sections completed or units delivered.	
g. Include reasons why any scheduled milestones or completion dates were not met, identifying problem areas and discussing how the problems will be solved. Discuss the expected impacts of delays and the steps planned to minimize these impacts.	
h. Provide a list of all outstanding claims exceeding \$100,000, and all claims settled during the reporting period. This list should be accompanied by a brief description, estimated costs, and the reasons for the claims.	
i. Include a list of all change orders and amounts exceeding \$100,000, pending or settled, during the reporting period. This list should be accompanied by a brief description.	

Category:

Index Code: 4-6.7

Page 2 of 2

Federal Compliance

2. The Department of Budget and Fiscal Services' Fiscal Services Branch (Fiscal) will be responsible to prepare the Financial Status Report (FSR). Draft FSRs for each active grant and a detailed report supporting the draft FSRs are due to TPD on the 20th day following the end of the quarter.
3. TPD will be responsible to check the consistency of each project's narrative progress with the financial information.
4. TPD will inform the responsible Fiscal accountant to finalize the FSRs on Federal Standard Form 269A (which has been modified to accommodate the Fiscal Officer's signature the "recommend approval" signature block), and submit the signed copies to TPD.
5. TPD will input the progress and milestone information into FTA's Transportation Electronic Award and Management (TEAM) system. TPD will coordinate the input of the financial information with Fiscal.
6. TPD will print a draft report for the Director's review and approval. Quarterly reports are due to FTA by the 30th day following the end of each quarter.
7. TPD will submit the quarterly reports via TEAM after the Director's approval.
8. TPD will distribute copies of the approved quarterly reports to Fiscal and the affected departmental units.
9. TPD will distribute worksheets for the upcoming quarterly reports to the affected departmental units by the end of each quarter.

ADOPTED:

Ceryle D. Soon
CHERYL D. SOON

Amendment _____

Date 2/17/04

Date _____

**FY 2015 Triennial Review Final Report
Corrective Action Form**

Review Area: 2. Technical Capacity

Deficiency: D-175 - FFATA reporting deficiencies

Corrective Action: Submit to the FTA regional office procedures for reporting future sub-awards to FSRS.

Notify the FTA regional office when the DTS has reported sub-awards to FSRS.

Action Taken: Procedures for reporting future sub-awards to the FSRS are attached. (Attachment A)

On July 1, 2015, information on sub-awards made on or after October 1, 2010 was uploaded by the Public Transit Division of DTS to the FSRS grant award and management system reporting site. Copies of the reports accepted by the site are attached. (Attachment B)

On July 2, 2015, FTA Region IX was notified via email of the submittal of the reports to FSRS. A copy of the email notice is attached. (Attachment C)

Attachment A

Procedures for Reporting Future Sub-Awards to FSRS

SUBJECT: FFATA Sub-Award Reporting

REFERENCES: Federal Funding Accountability and Transparency Act of 2006 (FFATA)
"FSRS Awardee User Guide" (January 23, 2015 update)

PURPOSE: To establish procedures to ensure timely reporting of awards exceeding \$25,000 to Human Services Transportation Coordination Program sub-recipients to the Federal Sub-Award Reporting System (FSRS) as required by the Federal Funding Accountability and Transparency Act of 2006 (FFATA), and any subsequent revisions thereto.

BACKGROUND:

Under the FFATA, and as a condition of receiving a grant from FTA, grantees that receive grants from FTA and pass through funds over \$25,000 to sub-recipients are required to report information on their sub-awards via www.fsr.gov beginning on October 1, 2010. This information is made available to the public on www.usaspending.gov. Reports must be posted by the end of the month after the month in which the grant recipient passes through funds to sub-recipients.

While not every JARC or New Freedom grantee passes through funds to sub-recipients, grantees in these programs are more likely to do so. The City and County of Honolulu/DTS is subject to these reporting requirements because it provides funds via the execution of Sub-Recipient Agreements with entities participating in coordinated transportation activities through the City's Human Services Transportation Coordination Program.

PROCEDURES:

1. The Public Transit Division (PTD) is responsible for all FFATA/FSRS reporting activities for sub-recipient agreements executed for coordinated transportation activities.

Note: Specific detailed instructions on preparing reports can be found on the FSRS website (see <https://www.fsr.gov/>; select "For Awardees").

2. Coordinated transportation project managers shall collect the following information upon execution of a sub-recipient agreement subject to FFATA reporting requirements:
 - a. Sub-recipient Information
 - i. Organization Name
 - ii. Data Universal Numbering System (DUNS) number
 - iii. Business Address
 - iv. Place of Performance (City, State and Zip Code)
 - b. Sub-Award Information
 - i. City Contract Number
 - ii. Award Title
 - iii. Sub-award Date
 - c. Funding Sources
 - i. All FTA grants funding the sub-recipient agreement, by FTA Grant Number
 - ii. Amount of sub-award made under each identified FTA Grant

SUBJECT: FFATA Sub-Award Reporting

REFERENCES: Federal Funding Accountability and Transparency Act of 2006 (FFATA)
"FSRS Awardee User Guide" (January 23, 2015 update)

3. The above information collected by coordinated transportation project managers shall be provided to the PTD Administration section no later than the third Friday of the month after the month in which the Sub-Recipient Agreement is executed. The information shall be entered in the FSRS website no later than the last day of the month after the month in which the Sub-Recipient Agreement is executed. For example, if a coordinated transportation sub-award is made to an entity in November but the Sub-Recipient Agreement is not executed by the City until February, the deadline to provide the data to PTD-Administration would be the third week of March and the deadline to enter the FFATA report in the FSRS website would be March 31.
4. A copy of each FFATA report submitted to and accepted by the FSRS shall be printed and maintained in the PTD file relating to the relevant Sub-Recipient Agreement.

ADOPTED:


MICHAEL D. FORMBY, Director

Amendment _____

Date: Jul 1 - 9 2015

Attachment B

DTS Reports Accepted by the FSRS

FFATA Report For Grants

Federal Award Identifier Number (FAIN): HI37X00900

Federal Agency ID: 6955

Is this information correct?: Yes

Federal Agency Name: FEDERAL TRANSIT ADMINISTRATION

Prime Awardee DUNS #: 614644565

Is this information correct?: Yes

DUNS Number +4:

Prime Awardee Name: HONOLULU, CITY &
COUNTY OF

Prime Awardee Doing Business As Name: DEPARTMENT OF TRANSPORTATION SERVICES

Prime Awardee Address: 650 S KING ST 3RD FL
HONOLULU, Hawaii 968133017

Prime Awardee Parent DUNS #: 077701647

Principal Place Of Performance(POP):
HONOLULU, Hawaii 968133017

CFDA Program Number(s): 20.516 Job Access And Reverse Commute Program

Is this information correct?: Yes

Project Description: JARC Service and Coordination

Is this information correct?: Yes

Total Federal Funding Amount: 382402.00

Is this information correct?: Yes

Obligation/Action Date: April 25, 2014

Is this information correct?: Yes

Report Month: Jul 2015

In your business or organization's preceding completed fiscal year, did your business or organization (the legal entity to which this specific SAM record, represented by a DUNS number, belongs) receive (1) 80 percent or more of your annual gross revenues in U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements; and (2) \$25,000,000 or more in annual gross revenues from U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements? No

Does the public have access to information about the compensation of the executives in your business or organization (the legal entity to which this specific SAM record, represented by a DUNS number, belongs) through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986?: No

Prime Awardee Names and Compensation of Highly Compensated Officers:

Subawardee Data

Subawardee Information: Subawardee DUNS:	066281809
Subawardee Name:	GOODWILL INDUSTRIES OF HAWAII, INC
Subawardee Doing Business As Name:	GOODWILL VOCATIONAL TRAINING CENTERS OF HAWAII
Subawardee Address:	2610 KILIHOU ST HONOLULU, Hawaii 968192020
Subawardee Parent DUNS:	066281809
Amount of Subaward:	206264.00
Subaward Obligation/Action Date:	April 29, 2015
CFDA Program Number(s):	20.516 Job Access And Reverse Commute Program
Federal Agency ID:	6955
Federal Agency Name:	FEDERAL TRANSIT ADMINISTRATION
Subaward Project Description:	Sub-recipient agreement for agency provided trips Cycle 5&6
Subawardee Principal Place of Performance:	Honolulu, Hawaii 968192020
Subaward Number:	SC-DTS-1400121
As provided to you by your subawardee, in your subawardee's business or organization's preceding completed fiscal year, did its business or organization (the legal entity to which the DUNS number it provided belongs) receive (1) 80 percent or more of its annual gross revenues in U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements; and (2) \$25,000,000 or more in annual gross revenues from U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements?:	No
As provided to you by your subawardee, does the public have access to information about the compensation of the executives in the subawardee's business or organization (the legal entity to which the DUNS number it provided belongs) through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986?:	No
Subawardee DUNS:	038278768
Subawardee Name:	PARATRANSIT, INCORPORATED
Subawardee Address:	2501 FLORIN RD SACRAMENTO, California 958224467
Subawardee Parent DUNS:	038278768
Amount of Subaward:	176138.00
Subaward Obligation/Action Date:	June 25, 2015
CFDA Program Number(s):	20.516 Job Access And Reverse Commute Program
Federal Agency ID:	6955

Federal Agency Name:

**FEDERAL TRANSIT
ADMINISTRATION**

Subaward Project Description:

**Sub-recipient
agreement for
mobility
management Cycle
5&6**

Subawardee Principal Place of Performance:

**Honolulu, Hawaii
968141613**

Subaward Number:

SC-DTS-1400122

As provided to you by your subawardee, in your subawardee's business or organization's preceding completed fiscal year, did its business or organization (the legal entity to which the DUNS number it provided belongs) receive (1) 80 percent or more of its annual gross revenues in U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements; and (2) \$25,000,000 or more in annual gross revenues from U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements?:

No

As provided to you by your subawardee, does the public have access to information about the compensation of the executives in the subawardee's business or organization (the legal entity to which the DUNS number it provided belongs) through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986?:

No

FFATA Report For Grants

Federal Award Identifier Number (FAIN): HI57X00700

Federal Agency ID: 6955

Is this information correct?: Yes

Federal Agency Name: FEDERAL TRANSIT ADMINISTRATION

Prime Awardee DUNS #: 614644565

Is this information correct?: Yes

DUNS Number +4:

Prime Awardee Name: HONOLULU, CITY &
COUNTY OF

Prime Awardee Doing Business As Name: DEPARTMENT OF TRANSPORTATION SERVICES

Prime Awardee Address: 650 S KING ST 3RD FL
HONOLULU, Hawaii 968133017

Prime Awardee Parent DUNS #: 077701647

Principal Place Of Performance(POP):
HONOLULU, Hawaii 968133017

CFDA Program Number(s): 20.521 New Freedom Program

Is this information correct?: Yes

Project Description: New Freedom service and coordinatio

Is this information correct?: Yes

Total Federal Funding Amount: 467499.00

Is this information correct?: Yes

Obligation/Action Date: May 4, 2012

Is this information correct?: Yes

Report Month: Jun 2015

In your business or organization's preceding completed fiscal year, did your business or organization (the legal entity to which this specific SAM record, represented by a DUNS number, belongs) receive (1) 80 percent or more of your annual gross revenues in U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements; and (2) \$25,000,000 or more in annual gross revenues from U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements? No

Does the public have access to information about the compensation of the executives in your business or organization (the legal entity to which this specific SAM record, represented by a DUNS number, belongs) through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986?: No

Prime Awardee Names and Compensation of Highly Compensated Officers:

Subawardee Data

Subawardee Information:	Subawardee DUNS:	074629460
	Subawardee Name:	SALVATION ARMY, THE
	Subawardee Doing Business As Name:	SALVATION ARMY 180 EAST OCEAN BLVD LONG BEACH, California 908064709
	Subawardee Address:	124863999
	Subawardee Parent DUNS:	81340.00
	Amount of Subaward:	June 29, 2012
	Subaward Obligation/Action Date:	20.521 New Freedom Program
	CFDA Program Number(s):	6955
	Federal Agency ID:	FEDERAL TRANSIT ADMINISTRATION
	Federal Agency Name:	Sub-recipient agreement for agency provided trips Cycle 4
	Subaward Project Description:	
	Subawardee Principal Place of Performance:	Honolulu, Hawaii 968173917
	Subaward Number:	SC-DTS-1200126
	As provided to you by your subawardee, in your subawardee's business or organization's preceding completed fiscal year, did its business or organization (the legal entity to which the DUNS number it provided belongs) receive (1) 80 percent or more of its annual gross revenues in U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements; and (2) \$25,000,000 or more in annual gross revenues from U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements?:	No
	As provided to you by your subawardee, does the public have access to information about the compensation of the executives in the subawardee's business or organization (the legal entity to which the DUNS number it provided belongs) through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986?:	No

FFATA Report For Grants

Federal Award Identifier Number (FAIN): HI57X00900

Federal Agency ID: 6955

Is this information correct?: Yes

Federal Agency Name: FEDERAL TRANSIT ADMINISTRATION

Prime Awardee DUNS #: 614644565

Is this information correct?: Yes

DUNS Number +4:

Prime Awardee Name: HONOLULU, CITY &
COUNTY OF

Prime Awardee Doing Business As Name: DEPARTMENT OF TRANSPORTATION SERVICES

Prime Awardee Address: 650 S KING ST 3RD FL
HONOLULU, Hawaii 968133017

Prime Awardee Parent DUNS #: 077701647

Principal Place Of Performance(POP):
HONOLULU, Hawaii 968133017

CFDA Program Number(s): 20.521 New Freedom Program

Is this information correct?: Yes

Project Description: New Freedom Service & Coordination

Is this information correct?: Yes

Total Federal Funding Amount: 247682.00

Is this information correct?: Yes

Obligation/Action Date: April 10, 2014

Is this information correct?: Yes

Report Month: Jul 2015

In your business or organization's preceding completed fiscal year, did your business or organization (the legal entity to which this specific SAM record, represented by a DUNS number, belongs) receive (1) 80 percent or more of your annual gross revenues in U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements; and (2) \$25,000,000 or more in annual gross revenues from U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements? No

Does the public have access to information about the compensation of the executives in your business or organization (the legal entity to which this specific SAM record, represented by a DUNS number, belongs) through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986? No

Prime Awardee Names and Compensation of Highly Compensated Officers:

Subawardee Data

Subawardee Information:

Subawardee DUNS:

066281809

Subawardee Name:

GOODWILL
INDUSTRIES OF
HAWAII, INC

Subawardee Doing Business As Name:

GOODWILL
VOCATIONAL
TRAINING CENTERS
OF HAWAII

Subawardee Address:

2610 KILHAU ST
HONOLULU, Hawaii
968192020

Subawardee Parent DUNS:

066281809

Amount of Subaward:

247682.00

Subaward Obligation/Action Date:

April 29, 2015

CFDA Program Number(s):

20.521 New Freedom
Program

Federal Agency ID:

6955

Federal Agency Name:

FEDERAL TRANSIT
ADMINISTRATION

Subaward Project Description:

Sub-recipient
agreement for agency
provided trips Cycle
5&6

Subawardee Principal Place of Performance:

Honolulu, Hawaii
968192020

Subaward Number:

SC-DTS-1400121

As provided to you by your subawardee, in your subawardee's business or organization's preceding completed fiscal year, did its business or organization (the legal entity to which the DUNS number it provided belongs) receive (1) 80 percent or more of its annual gross revenues in U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements; and (2) \$25,000,000 or more in annual gross revenues from U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements?:

No

As provided to you by your subawardee, does the public have access to information about the compensation of the executives in the subawardee's business or organization (the legal entity to which the DUNS number it provided belongs) through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986?:

No

FFATA Report For Grants

Federal Award Identifier Number (FAIN): HI90X03400

Federal Agency ID: 6955

Is this information correct?: Yes

Federal Agency Name: FEDERAL TRANSIT ADMINISTRATION

Prime Awardee DUNS #: 614644565

Is this information correct?: Yes

DUNS Number +4:

Prime Awardee Name: HONOLULU, CITY &
COUNTY OF

Prime Awardee Doing Business As Name: DEPARTMENT OF TRANSPORTATION SERVICES

Prime Awardee Address: 650 S KING ST 3RD FL
HONOLULU, Hawaii 968133017

Prime Awardee Parent DUNS #: 077701647

Principal Place Of Performance(POP):
HONOLULU, Hawaii 968133017

CFDA Program Number(s): 20.507 Federal Transit_Formula Grants

Is this information correct?: Yes

Project Description: Bus Preventive Maintenance (PM) & J

Is this information correct?: Yes

Total Federal Funding Amount: 23123112.00

Is this information correct?: Yes

Obligation/Action Date: September 10, 2014

Is this information correct?: Yes

Report Month: Jul 2015

In your business or organization's preceding completed fiscal year, did your business or organization (the legal entity to which this specific SAM record, represented by a DUNS number, belongs) receive (1) 80 percent or more of your annual gross revenues in U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements; and (2) \$25,000,000 or more in annual gross revenues from U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements?: No

Does the public have access to information about the compensation of the executives in your business or organization (the legal entity to which this specific SAM record, represented by a DUNS number, belongs) through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986?: No

Prime Awardee Names and Compensation of Highly Compensated Officers:

Subawardee Data

Subawardee Information: Subawardee DUNS:	066281809
Subawardee Name:	GOODWILL INDUSTRIES OF HAWAII, INC
Subawardee Doing Business As Name:	GOODWILL VOCATIONAL TRAINING CENTERS OF HAWAII
Subawardee Address:	2610 KILIAHU ST HONOLULU, Hawaii 968192020
Subawardee Parent DUNS:	066281809
Amount of Subaward:	102000.00
Subaward Obligation/Action Date:	June 2, 2015
CFDA Program Number(s):	20.507 Federal Transit_Formula Grants
Federal Agency ID:	6955
Federal Agency Name:	FEDERAL TRANSIT ADMINISTRATION
Subaward Project Description:	Sub-recipient agreement for local shuttle service Cycle 6
Subawardee Principal Place of Performance:	Honolulu, Hawaii 968192020
Subaward Number:	SC-DTS-1400120
As provided to you by your subawardee, in your subawardee's business or organization's preceding completed fiscal year, did its business or organization (the legal entity to which the DUNS number it provided belongs) receive (1) 80 percent or more of its annual gross revenues in U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements; and (2) \$25,000,000 or more in annual gross revenues from U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements?:	No
As provided to you by your subawardee, does the public have access to information about the compensation of the executives in the subawardee's business or organization (the legal entity to which the DUNS number it provided belongs) through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986?:	No
Subawardee DUNS:	038278768
Subawardee Name:	PARATRANSIT, INCORPORATED
Subawardee Address:	2501 FLORIN RD SACRAMENTO, California 958224467
Subawardee Parent DUNS:	038278768
Amount of Subaward:	440662.00
Subaward Obligation/Action Date:	June 25, 2015
CFDA Program Number(s):	20.507 Federal Transit_Formula Grants
Federal Agency ID:	6955
Federal Agency Name:	

Subaward Project Description:	FEDERAL TRANSIT ADMINISTRATION Sub-recipient agreement for mobility management Cycle 5&6
Subawardee Principal Place of Performance:	Honolulu, Hawaii 968141613 SC-DTS-1400122
Subaward Number:	SC-DTS-1400122
As provided to you by your subawardee, in your subawardee's business or organization's preceding completed fiscal year, did its business or organization (the legal entity to which the DUNS number it provided belongs) receive (1) 80 percent or more of its annual gross revenues in U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements; and (2) \$25,000,000 or more in annual gross revenues from U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements?:	No
As provided to you by your subawardee, does the public have access to information about the compensation of the executives in the subawardee's business or organization (the legal entity to which the DUNS number it provided belongs) through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986?:	No
Subawardee DUNS:	066281809
Subawardee Name:	GOODWILL INDUSTRIES OF HAWAII, INC GOODWILL VOCATIONAL TRAINING CENTERS OF HAWAII
Subawardee Doing Business As Name:	2610 KILIHOU ST HONOLULU, Hawaii 968192020
Subawardee Address:	2610 KILIHOU ST HONOLULU, Hawaii 968192020
Subawardee Parent DUNS:	066281809
Amount of Subaward:	88827.00
Subaward Obligation/Action Date:	April 29, 2015
CFDA Program Number(s):	20.507 Federal Transit_Formula Grants
Federal Agency ID:	6955
Federal Agency Name:	FEDERAL TRANSIT ADMINISTRATION Sub-recipient agreement for agency provided trips Cycle 5&6
Subaward Project Description:	FEDERAL TRANSIT ADMINISTRATION Sub-recipient agreement for mobility management Cycle 5&6
Subawardee Principal Place of Performance:	Honolulu, Hawaii 968192020 SC-DTS-1400120
Subaward Number:	SC-DTS-1400120
As provided to you by your subawardee, in your subawardee's business or organization's preceding completed fiscal year, did its business or organization (the legal entity to which the DUNS number it provided belongs) receive (1) 80 percent or more of its annual gross revenues in	No

U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements; and (2) \$25,000,000 or more in annual gross revenues from U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements?:

As provided to you by your subawardee, does the public have access to information about the compensation of the executives in the subawardee's business or organization (the legal entity to which the DUNS number it provided belongs) through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986?:

No

Attachment C

Email Notification to FTA Region IX

Mark, Eileen Y.

From: Mark, Eileen Y.
Sent: Thursday, July 02, 2015 6:17 PM
To: 'Catherine.Luu@dot.gov'
Cc: Au, Mark; Formby, Michael; Garrity, Mark N; Hieda, Gerald; Ing, Strather D.
Subject: RE: Ensuring FFATA Subaward Reporting Compliance
Attachments: Finding D-175 FFATA-HI37X009.pdf; Finding D-175 FFATA-HI57X007.pdf; Finding D-175 FFATA-HI57X009.pdf; Finding D-175 FFATA-HI90X034.pdf

Catherine,

One of the corrective actions prescribed by the FTA for Technical Capacity Deficiency Finding D-175 (FFATA reporting deficiencies) of the FTA's FY 2015 Final Triennial Review Report of the City and County of Honolulu was for DTS to, "Notify the FTA regional office when DTS has reported subawards to FSRs".

This is to confirm that on July 1, 2015, information on sub-awards made after October 10, 2010 were uploaded by DTS to the FSRs grant award and management system reporting site. Pdf copies of the reports are attached for your reference.

Please feel free to contact me at 808-768-8379 if you have further questions.

Aloha,
 Eileen Mark

From: Catherine.Luu@dot.gov [mailto:Catherine.Luu@dot.gov]
Sent: Tuesday, June 23, 2015 8:09 AM
To: Kathleen.Healy@fresno.gov; ara.nurcanyan@fresno.gov; John.Downs@fresno.gov; parnest@fresnocog.org; Darlene.Christiansen@fresno.gov; Scanlon, Elizabeth; Froemming, Kate; Arakaki, Diane; Au, Mark; Ing, Strather D.; Mark, Eileen Y.; kathiwilliams@imperialctc.org; R_Fernbaugh@ci.lompoc.ca.us; gstraw@slorta.org; dabdella@cityofmadera.com; ellen.moy@comcast.net; tprzybyla@cityofmadera.com; cli@nctd.org; rbailey@nctd.org; MCox@ci.visalia.ca.us; JAdelman@sacrt.com; LTyler@sacrt.com; BVaughanBechtold@sacog.org; GAnguiano@slocity.org; aodell@ci.santa-maria.ca.us; CQuevedo@ci.visalia.ca.us; jphillips@yctd.org; tbassett@yctd.org
Subject: Ensuring FFATA Subaward Reporting Compliance

Dear Grantees,

Please read the message below re: subaward reporting requirements if they are applied to you . Thank you.

" Under the Federal Funding Accountability and Transparency Act (FFATA), and as a condition of receiving a grant from FTA, grantees that received grants from FTA beginning on 10/1/2010 and passed through funds to subrecipients are required to report information on their subawards via www.fsr.gov. This information is then made available to the public on www.usaspending.gov. Reports need to be posted by the end of the month after the month in which the grant recipient passes through funds to subrecipients.

While not every JARC or New Freedom grantee passes through funds to subrecipients, grantees in these programs are more likely to do so.

States should have reported by the end of the month after the month in which they awarded funds to their subrecipients. For some states, this deadline may not have occurred yet, but in most cases it likely has already passed.

You can find more information on what's expected and the subaward reporting process on our website at <http://www.fta.dot.gov/grants/12219.html> .

If State DOTs have not submitted their reports due to technical difficulties, please contact me . We're aware that some grantees have had trouble using www.fsr.gov and will try to do what we can to assist. "

7/2/2015

Thank you,

Catherine C. Luu

Program Manager / General Engineer

U.S. DOT- Federal Transit Administration, Region IX

201 Mission Street, Suite 1650

San Francisco, CA 94105

Tel: (415) 744-2730

Fax: (415) 744-2726

catherine.luu@dot.gov

Americans With Disabilities (ADA)

**FY 2015 Triennial Review Final Report
Corrective Action Form**

Review Area: ADA

Deficiency: D33 - Improper ADA complementary paratransit eligibility determination process

Corrective Action: By June 12, 2015, the City must develop and submit to the FTA Region IX and X Civil Rights Officers its procedures for ensuring that the eligibility process of Innovative Paradigms meets the regulatory requirements for making eligibility determinations.

Action Taken: To address this requirement, attached is the City's Monitoring Plan of TheHandi-Van Eligibility Center's eligibility determination records to ensure that all regulatory requirements are met for making eligibility determinations.

As described in the Plan, the City will conduct, no less than bi-annually, complete reviews of records and the status of application records of the Eligibility Center, utilizing the Center's electronic data management system. The City will also have the option of observing an in-person interview assessment during these reviews. DTS began implementing these procedures on March 11, 2015.

Review Checklist for TheHandi-Van Eligibility Center

Review Conducted by	Date
Review Type	Other:

Agency Name	Innovative Paradigms TheHandi-Van Eligibility Center	Reporting Period
Address	1100 Ward Avenue Suite 835 Honolulu, HI 96814	Contact Phone
Contact		
Project Description	ADA paratransit eligibility center	Project Type
		Project Start
		Project End

Please provide project status (progress, problems, successes) and general comments below.

Review Checklist for TheHandi-Van Eligibility Center

Review Factor	Verified	Follow-Up Required	Source Documentation	Reviewer Notes
ADA ELIGIBILITY FACTORS				
Timeliness of Determinations				
Unfinished Determinations				
Interview Observation (if possible)				
Review of Applicant Files				
ADMINISTRATIVE FACTORS				
Timeliness of Mailings				
Time Between In-Take Call & Interview				
Appointment Scheduling				
Call Wait Time				
TRAVEL TRAINING FACTORS				
Referrals				
Assessment				
Consent Forms				
Progress Checklist				
Training Notes				
Final Reports				

The following instructions are provided to the reviewer relative to specific items to be verified, measured, or calculated during the review process. The review shall take place on no less than a bi-annual basis, and should take no longer than 3 hours to complete. If time permits, the reviewer has the option of observing an in-person interview during the review.

ADA Eligibility Factors:

Timeliness of Determinations: As required by the provisions of the Americans with Disabilities Act and per the terms of its contract with the City & County of Honolulu, the contractor is required to make eligibility determinations within 21 days from the date that all information needed to complete the application is received. If an eligibility determination has not been made by the 21st day after receipt of complete application information, the applicant shall be treated as eligible and provided service until and unless the applicant is deemed to be Not Eligible. The contractor shall utilize an electronic data management system (DMS) with the capability of producing reports that clearly outline the status of each application (i.e. how many days have passed since the initial interview and since the application is considered complete). Required DMS information must include: the Application Complete Date, Determination Complete Date, and the number of days between these process landmarks which allow the reviewer to determine if any determinations have exceeded the maximum 21-day processing timeframe. The DMS shall also provide the average number of processing days.

Unfinished Determinations: The DMS shall show the number of determinations that are awaiting processing, and provide reports for each Mobility Coordinator outlining the number of applicants that are awaiting determinations. The DMS shall be able to generate a report that indicates the number of days that have passed since the original Interview Date, the Application Complete Date (if applicable), and the date the Mobility Coordinator first sought additional information from an applicant's medical provider.

Interview (Time permitting): The reviewer has the option of observing an interview during the process. An effort shall be made to observe a different Mobility Coordinator during each review period so that the reviewer has an opportunity to observe all staff who perform this function. Trained Mobility Coordinators shall conduct Interviews in private offices. However, it should be noted that the interviewers are instructed to begin observing the applicant from the moment they are greeted in the lobby. As part of the process, the reviewer shall observe the following functional assessments (if applicable):

Tinetti Balance & Gait Assessment: The Tinetti Balance & Gait Assessment is a functional assessment that is used during the eligibility process to determine if an applicant is at risk of fall. This assessment should be performed on those who can ambulate

independently into the interview area. Those who require assistance should not be required to participate in the Tinetti Balance & Gait Assessment. The procedure for giving this assessment should be done in the same order, regardless of the assessor. Those who are found to be at a low, or medium, risk of fall should be given a Transit Skills Assessment.

Transit Skills Assessment: The Transit Skills Assessment (TSA) is a timed ½ mile simulated walk to a bus stop. The assessment is used to determine endurance, stamina, ability to navigate, way finding skills, and the ability to maneuver over different types of terrain. During the TSA, the Mobility Coordinator shall clearly document the time the assessment begins, the time that the applicant finishes each of 8 blocks, and the time the assessment ends. Any struggles or difficulty observed shall also be clearly documented. During the assessment the Mobility Coordinator should stand in a position where they can see the applicant at all times, remain attentive, and allow the applicant to move at his or her own pace.

Review of Applicant Files: Reviewer shall request, at random, a completed file under each of the following determination categories: Unconditional, Conditional, Temporary Unconditional, Not Eligible. Each applicant file should have a completed interview, appropriate assessments with documentation, complete Mobility Coordinator Notes, Professional Verification (if necessary), and a Determination Letter sent in a timely manner. Except for Unconditional and Temporary Unconditional determinations, all other determination letters should be accompanied by a Notice of Appeal form. A Determination Review Checklist has been provided for the reviewer (Attachment B), as well as a flow-chart of the decision making process (Attachment C). One Determination Review Checklist should be used for each applicant file that is reviewed.

Professional Verification: In some cases the Mobility Coordinator may not have all of the information necessary in order to make a determination at the end of the interview. It may be necessary to contact the applicant's medical professional in order to verify the presence of a disability, or to receive more information about the individual's specific condition. Typically this is done by sending the professional a questionnaire, as well as a signed consent to disclose form, via facsimile. As outlined in the Standard Operating Procedures (Attachment A), the initial contact with the medical professional should take place within one business day of the interview. Subsequent follow-up with the medical professional, if necessary, should happen up to 3 more times within 10 days. If unable to obtain the required information from the medical professional, an additional attempt should be made by contacting the applicant directly to inform them of the delay, and request assistance in obtaining the information.

Historically, the contractor has found that Professional Verification is only necessary on approximately 13% of determinations. An observed performance (that includes functional assessment) that warrants Unconditional Eligibility (UNC) does not require Professional Verification. Functional assessments, observations and responses to interview questions should be sufficient for applicants reporting physical disabilities. Professional Verification should be used in situations where functional assessments to determine physical ability to perform tasks necessary to use fixed route are not dispositive. These include:

- Seizure disorders
- Psychiatric disorders
- Vision impairments
- Those who as a result of functional assessments may be found Not Eligible
- Disabilities which may intermittently and/or progressively impair an applicant's ability to access and ride the fixed route bus (i.e., Parkinson's disease)

Administrative Factors:

Timeliness of Mailings: Letters notifying applicants of their eligibility status should be sent within two (2) business days of the Determination Complete Date. The DMS should indicate the Letter Sent Date for each determination, and calculate how many days after the determination has been completed that the letter notifying the applicant of their status was mailed.

Time Between In-Take Call & Interview: The DMS should also include this information, which is the amount of time (in days) that passes between the day the applicant calls to schedule an in-person interview, and the day of the actual interview. When this number is large (30-60 days), the reviewer will verify whether or not this was at the request of the applicant.

Appointment Scheduling: The DMS shall contain a tool for scheduling interview appointments. Administrative staff schedules eligibility interviews by phone while using the DMS as the primary recording tool. Administrative staff shall be courteous, and knowledgeable of the entire eligibility process so that questions can be answered as part of the in-take phone call. Administrative staff should offer complimentary transportation to those requesting appointments, and work with the transportation provider (Oahu Transit Services) to schedule such trips.

Call Wait Time: Given the historic demand for appointments at The Eligibility Center it is expected that not all who call to schedule an interview will immediately be greeted by a member of the administrative staff. A system should exist to professionally place such callers on "hold". Callers should not be expected to wait for an unreasonable amount of time before speaking to a representative of The Eligibility Center. If a caller chooses to leave a message, Eligibility Center staff shall respond in a timely manner.

Travel Training Factors:

Referrals: Referrals for Travel Training shall be recorded in the DMS. The Travel Trainer shall be notified of an applicant's interest in Travel Training within one day of their interview, and shall make every effort to contact each referral within one week to discuss Travel

Training and schedule the assessment. Referral dates, as well as notes by the Travel Trainer on the responses of each referral contacted shall also be kept in the DMS.

Assessment: Before beginning Travel Training, each trainee shall receive a one-on-one person-centered assessment. During the assessment the trainer shall gather information that will aid in preparing an individualized training plan. The Assessment form shall also be located in the DMS and be completed before the beginning of training.

Consent Forms: During the assessment, the trainee shall be asked to sign the Consent Form, and Acknowledgement of Insurance Form. The forms must be signed prior to the commencement of training. These forms shall be also located in the DMS.

Progress Checklist: The Progress Checklist is a tool used by the trainer to ensure that all skills necessary to ride fixed route public transit are taught during travel training. It is used to indicate that the trainer has observed that the trainee has acquired each of the skills, and can perform them independently. The Progress Checklist should be completed before a trainee is considered to have successfully completed the Travel Training program. The Progress Checklist should also be kept in the DMS.

Training Notes: The Travel Trainer shall keep detailed notes that are updated constantly throughout the training process. Notes shall include detail on each day of training, obstacles encountered, and information on the overall training plan and goal(s). The Training Notes shall also be retained in the DMS.

Final Reports: For each Travel Training trainee, there shall be a completed Final Report. The Final Report shall provide detail on the trainee's disability, their obstacles to using public transportation independently, and most importantly, what occurred during training in order to help the trainee overcome the obstacles to riding the bus. The Report shall also indicate whether or not the outcome of the training was successful.

Professional Verifications – rev. 2/7/12

2/7/12
3/1/11
3/29/10

Applicants shall be given 10 business days from the date of their in-person interview to provide contact information to secure professional verification from a health care provider before being issued an Incomplete determination.

In cases where a release of information form is signed and the name, address, phone and fax numbers of a health care provider are provided, Mobility Coordinators shall follow up a minimum of two times during the 10 business-day period to secure verification. The dates, times, contact person, and results of these efforts shall be documented in the Mobility Coordinator Notes field on the interview form.

In cases where, at the time of the in-person interview, the applicant does not have or cannot provide the name, address, phone and fax number of a health care provider, the Mobility Coordinator shall explain clearly to the applicant the following:

- A determination will be based on the information obtained during the in-person interview and assessment. If functional assessments were not conducted due to applicant's refusal to participate, eligibility cannot be determined without professional verification and a determination of Incomplete will be issued.
- A grace period of 10 business days from the date of the in-person interview shall be granted to the applicant in order for the applicant to obtain a healthcare provider and/or to schedule an appointment necessary such that professional verification can be provided to the Eligibility Center
- The applicant must contact the Eligibility Center with the name of the healthcare provider and the date and time of an appointment or must provide written professional verification within 10 business days of the in-person interview
- If professional verification is not received or a confirmation of an appointment is not received within 10 business days from the date of the in-person interview, the determination will be made based on the information provided during the interview, including but not limited to
 - Responses to interview questions
 - Results of Tinetti Gait and Balance Test
 - Results of Transit Skills Assessment

Recommended Schedule for Professional Verification:

- Day 1 fax out request
- Day 2 follow up on request (if Administrative Specialist is available, he/she could call to make sure the fax was received)
- Day 4/5 follow up on request again

- Day 7 contact applicant and tell him/her to contact doctor
- Day 9 final follow up
- Day 11 process determination

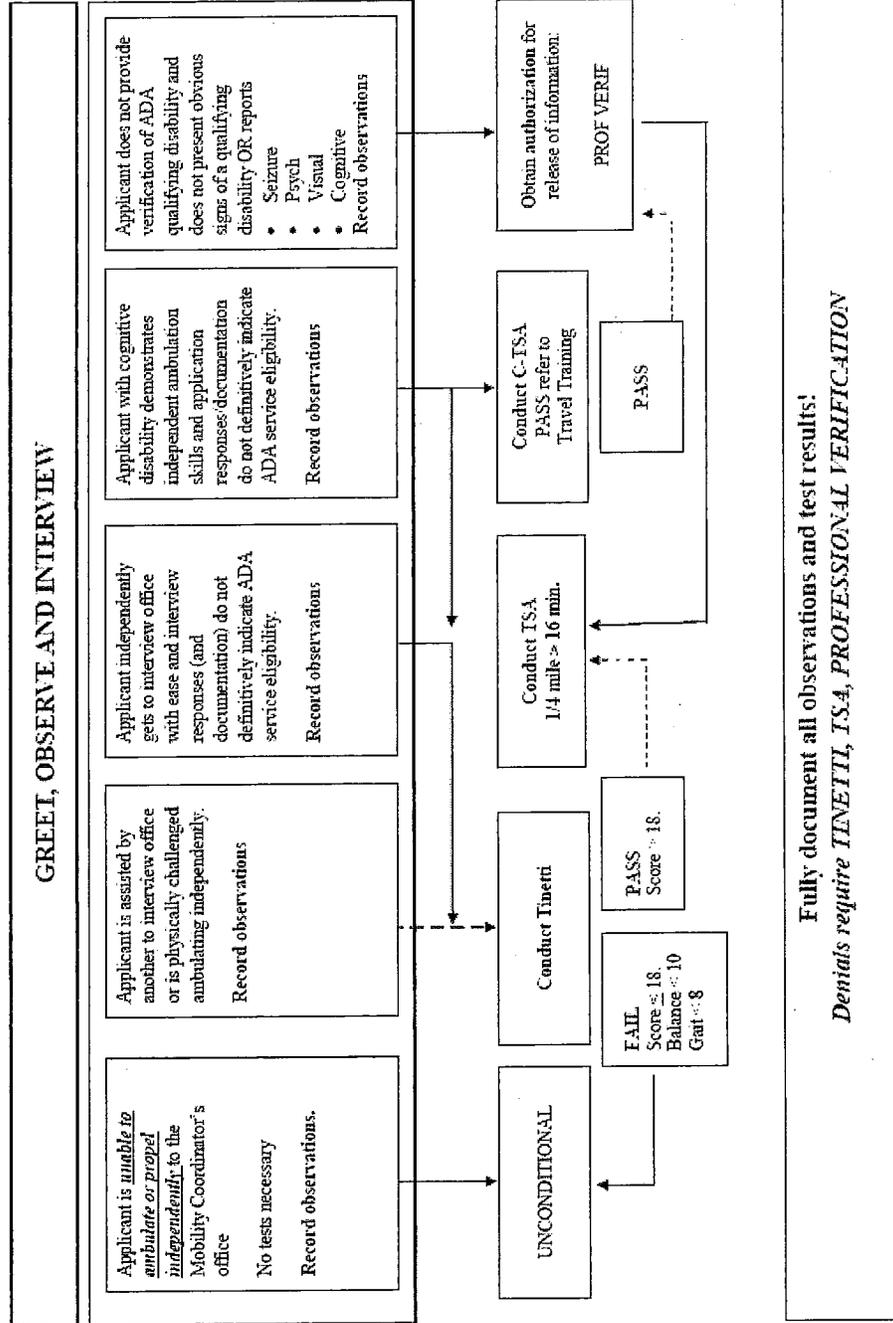
Document each step thoroughly.

Determination Review Checklist

HV ID#:	Eligibility Type:			Date:
	YES	NO	N/A	
INTERVIEW				
All relevant questions were asked and answers were documented clearly and were appropriate to the question asked.				
Mobility Coordinator Notes are clear and concise				
Appropriate Assessments were conducted (and reasons therefore were documented)				
FUNCTIONAL ASSESSMENTS				
Results were clearly documented				
Decision tree was followed				
PROFESSIONAL VERIFICATION				
Professional Verification was appropriately acquired				
Initial contact made in a timely manner				
Additional follow-up conducted (if necessary)				
DETERMINATION				
Reason for the determination was clearly documented				
Determination was made within 21 days of the receipt of all necessary information (App Complete Date).				

TheHandi-Van Eligibility Center Decision Tree

Decision Tree: Assessments & Determinations
Revised 10/25/14



**FY 2015 Triennial Review Final Report
Corrective Action Form**

Review Area: ADA

Deficiency: D73 - ADA Complementary Paratransit service deficiencies

Corrective Action: By June 12, 2015, submit to the FTA Region IX and X Civil Rights Officers the City's revised OTS ADA Complementary Paratransit Policies and Procedures that explicitly state that route deviation is not provided."

By June 12, 2015, submit to the FTA Region IX and X Civil Rights Officers the City's revised OTS ADA Complementary Paratransit Policies and Procedures to state that when advance notice for door-to-door service is not given, OTS will make its best efforts to provide the needed assistance.

Action Taken: Revised copies of OTS General Policies and Procedures (GPPs) are attached to address both corrective actions. GPP 9.04, "Community Access (CA) Service" is revised to remove all references to route deviation service. GPP 7.04, "Origin-to-Destination Paratransit Service" is revised to remove language requiring advanced notification of the need for door-to-door assistance.

PARATRANSIT SERVICES GENERAL POLICIES AND PROCEDURES



PARATRANSIT SERVICE CRITERIA

Policy Number: 9.04

Page: 1 of 4

Title: COMMUNITY ACCESS (CA) SERVICE

Effective: 03/16/15

Supersedes: 12/15/04

The Community Access is considered a fixed-route service and provided by Paratransit operations as part of the Collective Bargaining Agreement (CBA) and uses Paratransit vehicles assigned on the routes.

Level of Service

Accessible vans 30' or less in length with a maximum load of 16 seated passengers, 2 wheelchair positions, and 5 standing passengers based on the vehicle gross weight requirements are currently assigned to this service.

Fixed-Route Service

The Community Access Route Schedule forms and current Route and Timetables for each route provide the map and scheduled time points followed while in service. Each designated bus stop on the route is serviced unless the vehicle has reached the allowed capacity and then only those bus stops where customers request to be dropped off are serviced until space is available within this allowed capacity.

Operators are not permitted to pick-up and transport customers while in out-of-service status to and from their first or last point on the run, unless approved by Dispatch.

Operators are required to maintain scheduled service especially to bus stops where passenger transfers are made with other bus routes. All delays are reported and coordinated with Dispatch. At no time will the operator maintain the schedule by violating defensive driving and safety requirements. If the schedule cannot be met consistently, the operator will submit an Incident Report providing sufficient detail for Operations review.

An operator may be requested to do a turnback by Dispatch because the service has been delayed to the point it cannot be caught up and there are no passengers onboard. A turnback means to return out-of-service to a point on the route where the time matches the scheduled route time point and direction. All turnbacks must be cleared by Dispatch and an Incident Report submitted to Operations.

Policy Number: 9.04

Page: 2 of 4

Title: COMMUNITY ACCESS (CA) SERVICE

Effective: 03/16/15

Supersedes: 12/15/04

The operator shall politely request an ambulatory passenger sitting on the seats in the designated wheelchair position to move in order to safely accommodate the boarding wheelchair passenger.

The CA level of service on holidays is based on the fixed-route holiday schedule, which may be different from that observed by the Paratransit service.

Fares and Transfers

Passengers boarding the vehicle are required to pay the exact fare, surrender a valid transfer, or show an authorized pass in accordance with the fare structure established by the City for the fixed-route (TheBus) service. The fare structure with special requirements does change over time and the latest notices issued by the Transportation Department are posted at a specific location on the bulletin board for operator review and enforcement.

Transfers are issued to passengers requesting them only after payment of a fare or presentation of an authorized pass. Transfer design and use change over time and the operator is required to review and enforce the latest notice posted on the bulletin board.

At times a dispute over the proper fare, transfer, or use of a pass may occur. The operator is expected to use good judgment, give the passenger the benefit of the ride, and report it to Dispatch or Operations for clarification.

Farebox and Vault System

Each CA vehicle is equipped with a farebox and vault system to collect fares for processing by the Counting Room that is similar to TheBus fare collection system. Maintenance is responsible to remove the vault with money and replace it with an empty vault daily. The vault with money and a copy of the completed CA Route Schedule form are taken to the Counting Room for processing and recording.

Farebox

The farebox is designed to collect primarily coins and is equipped with an inspection plate to allow the operator to determine that the proper fare is deposited. The operator is expected to clear the inspection plate after each passenger pays their fare and avoid the buildup of money that can jam the chute. Passengers using paper currency should be politely advised prior to depositing their fare to fold the currency into a small size so it will not jam the farebox chute.

Policy Number: 9.04

Page: 3 of 4

Title: COMMUNITY ACCESS (CA) SERVICE

Effective: 03/16/15

Supersedes: 12/15/04

Non-Operating Farebox

CA vehicle may be issued without a farebox that requires the operator to collect fares by hand and turn in the fares to Operations upon completion of their run.

Farebox Malfunction

Report farebox malfunctions to Dispatch for further instructions. Dispatch may refer this problem to a fixed-route supervisor in the area or maintenance to help clear the problem. Operator may have to continue in service to maintain the schedule and is authorized to collect fares by hand until the farebox is cleared or as directed by Dispatch.

Bicycle Rack

The special fold down bicycle rack with space for two bicycles is mounted at the front of the van for use by those individuals able to load and unload their personal bicycle free of charge.

The rack remains in the up or folded position until the passenger needs it and the operator provides guidance to the individual who does not know how to use the bike rack. Pull down to release the bicycle rack, place wheels of bicycle in slots and raise the support arm over the front wheel of bicycle to secure it in place.

Operator must secure van in stop position during loading and unloading of bicycle, keep individual in sight at all times, and continue in service only after the individual boards or is clear of the van front area. An entry is required in the Bike Rack Column of the CA Route Schedule form and the normal accident reporting process is followed for any observed or reported damage or injury involving the use of the bicycle rack.

Servicing Bus Stops

Operator is required to service only authorized bus stops that meet normal safety and security requirements. A maximum of two buses may service the bus stop where space is available. The second vehicle shall make sure sufficient following space to pull around the first vehicle, just in case the first vehicle stalls. When in the second position, operator must stop at bus stop sign to ensure potential passengers have the opportunity to board the bus going to their destination.

Fixed-route buses with mobility lifts have rear signs programmed to display a left arrow while the lift is in operation as warning the following bus not to approach too closely.

Operator is required to call out major intersections, transfer points, and major stops. Also, when approaching each bus stop, visually scan for impaired disabled passengers who may be identified by the following:

- Using a white cane.
- Traveling with a guide dog.
- Using low vision travel aides, such as monocular or binoculars.
- Wearing dark glasses for eye protection.
- Holding a route sign card.

Operators must be alert for passengers and travel in the proper lane at a speed where they have time to see potential passengers and can safely service the bus stop. When servicing the bus stop, pull vehicle in parallel and within 6 to 12 inches of the curb face. Obstructions such as parked vehicles, leaning utility poles, trees, awnings, etc., may prevent stopping close to the curb and the vehicle should be angled so the doorway is close to the curb. When stopped at an angle, check for bicycles or mopeds trying to squeeze between your vehicle and the curb before opening the door to alight and board passengers. If the operator cannot stop close to the curb due to obstructions, then stop vehicle at least 3 to 4 feet from the curb to prevent passengers from trying to jump or take a long step from curb to vehicle, which may cause them to fall.

Ensure vehicle is at a full stop position before opening or closing door after boarding or alighting passengers. Also, check to be sure that the right side and front is clear prior to pulling out of the bus stop.

Federal safety law requires operator to have an unobstructed view of the doorway to the right at all times, this means standing passengers must remain clear of the front doorway area.

Operations

Operators are required to follow and enforce all appropriate GPP for all other work requirements not covered by this policy and procedure.

PARATRANSIT SERVICES GENERAL POLICIES AND PROCEDURES



DEALING WITH CUSTOMERS

Policy Number: 7.04

Page: 1 of 3

Title: ORIGIN-TO-DESTINATION PARATRANSIT SERVICE Effective: 03/16/15
Supersedes: 04/01/13

TheHandi-Van shall provide standard curb-to-curb service, AND additional assistance (i.e., door-to-door service) to those paratransit riders who, due to their disabilities, need assistance beyond the curb. This additional door-to-door assistance must be offered to ensure that TheHandi-Van paratransit service is actually provided "from the user's point of origin to his or her destination point."

Examples: a) The nature of a particular individual's disability or adverse weather conditions may prevent him/her from negotiating the distance from the door of his/her home to the curb; and b) A physical barrier (e.g., sidewalk construction) may prevent a passenger from traveling between the curb and the door of his/her destination point.

Vehicle operators are obliged to provide door-to-door service when it is needed and appropriate to meet the ADA's origin-to-destination service requirement.

Door-to-door service requires vehicle operators to provide assistance to and from the vehicle and the door of the establishment if needed by the rider, following established policies. However, the operator *does not* assume the role of a personal care attendant (PCA). For example, an operator cannot wait with a rider at the destination.

TheHandi-Van understands that enhanced or door-to-door service is Not An Unlimited Right, and that fundamental alteration or undue burdens are not required.

Examples: Operators are not required to provide services that exceed "door-to-door" service (e.g., go beyond the doorway into a building to assist a passenger). Nor do operators, for lengthy periods of time, have to leave their vehicles unattended or lose the ability to keep their vehicles under visual observation. Such activities come under the heading of "fundamental alteration" or "undue burden."

If the eligibility process has determined that assistance will be needed and it automatically appears on the trip-booking screen, the reservationists shall still confirm the need with the rider.

Vehicle operators shall be trained to always check manifests for this information and any instructions. If MDTs are used and trip information is transmitted electronically, operators shall be trained on where to look for the information to avoid missed connections and missed trips.

TheHandi-Van shall establish procedures for promptly investigating specific pick-up and drop-off locations as vehicle operators identify problems, in order to determine the best location to perform an alternate pick-up or drop-off. When these situations occur, site assessments shall be done to determine whether or not assistance can be safely provided. If assistance cannot be provided, this shall be brought to the rider's attention and alternatives for providing service explored (e.g., another entrance or defined meeting point). Once assessed and resolved, the information shall be recorded for future trips booked to or from the same location.

TheHandi-Van shall develop operational policies for vehicle operators to identify passengers and for passengers to identify vehicles, especially those riders with vision and cognitive disabilities and other disabilities. This includes identification in situations of inclement weather and low light that make it difficult to identify waiting vehicles. Reasonable assistance shall be provided as needed to make the connection between vehicle operator and passenger, in addition to providing physical assistance.

TheHandi-Van shall train all vehicle operators on its door-to-door assistance policies and on how to properly provide assistance to and from vehicles to riders with various types of disabilities.

TheHandi-Van shall also ensure that all taxi companies and other subcontractors that perform ADA paratransit service also follow origin-to-destination policies and practices.

Taxi and other subcontractor drivers must receive the same training as TheHandi-Van vehicle operators to carry out TheHandi-Van rider assistance policies.

TheHandi-Van training shall provide as much basic understanding as possible, and include when to rely on back up from a dispatcher or supervisor.

Such training will acknowledge that even with thorough training, vehicle operators will still need to exercise some operational judgment. Such exercise of judgment is comparable to many other jobs (i.e., security, school teaching), wherein situations will arise that could not be predicted in advance.

TheHandi-Van operators and subcontractors shall abide by the following policies concerning as-needed door-to-door service, which are established in consideration of safety, the need for vehicle operators to maintain effective control over their vehicles, and other factors.

- Vehicle operators are required to go to the outside door of a building, and knock or ring the doorbell at the outside building door for door-to-door service, particularly if needed to communicate to the rider that the vehicle has arrived.

- Vehicle operators may open the first exterior door to a public waiting space and announce their presence. If the entrance has a second door nearby that leads to a waiting area, vehicle operators may open the second door to announce their arrival. However, vehicle operators are not permitted to go through any other doors including dwellings.
- Vehicle operators shall keep vehicles in sight if there are other riders on board. If there are no other riders on board and the vehicle can be secured, maintaining a line of sight is not necessary.
- Vehicle operators shall assist riders who use manual wheelchairs up or down one-step or curb. A flight of steps presents too great a risk of harm (direct threat) and is not required.
- Vehicle operators shall provide assistance to riders of limited mobility due to disability up and down the steps of the vehicle, and a step or curb from the door to the vehicle, assuming other safety policies (such as maintaining effective continuing control of the vehicle) are not compromised.
- Vehicle operators shall follow the same policies as established for TheBus regarding: what constitutes a direct threat to others (significant risk of substantial harm) or legitimate safety risk, and what constitutes communications access (including auxiliary aids and services).
- Vehicle operators are required to push a rider up a ramp if needed by the rider. However, pushing a person up an excessively steep slope that presents too great a risk of harm (direct threat) is not required.
- Vehicle operators are not required to do extensive work to clear a path of travel for door-to-door service, which would be a fundamental alteration of the ADA paratransit service. But a more easily performed action, such as moving one or two light objects out of a wheelchair user's path, shall be required.
- Some adverse weather conditions (i.e., heavy rain/flooding) may be a fundamental alteration or direct threat, and in such cases, door-to-door assistance by vehicle operators may be limited or not required. But there are many other circumstances where the vehicle operator can reasonably assist the person to reach the vehicle.
- If a rider needs door-to-door service due to disability and is carrying packages that would be allowable on the fixed route service, then vehicle operators are required to carry a limited amount of groceries and other packages, if needed by the rider. However, the need for assistance with carrying packages is not, in and of itself, a basis for ADA paratransit eligibility.

**FY 2015 Triennial Review Final Report
Corrective Action Form**

Review Area: ADA

Deficiency: D650 - Insufficient oversight of contractors for ADA complementary paratransit

Corrective Action: By June 12, 2015, the City must develop and submit to the FTA Region IX and X Civil Rights Officer DTS interim procedures for ensuring OTS' and its taxi subcontractors' processes comply with the regulatory requirements for monitoring service provision.

By December 31, 2015, the City must submit to the FTA Region IX and X Civil Rights Officer final standards and monitoring procedures, along with evidence of its implementation for the months of October and November 2015.

Action Taken: Please see the attached DTS Standard Operating Procedure (SOP) 7-1.3, "Paratransit Operations Monitoring." This document was approved on May 7, 2015 and contains DTS' final procedures for ensuring OTS' and its taxi subcontractors' processes comply with the regulatory requirements for monitoring service provision.

By December 31, 2015, the City will submit to the FTA Region IX and X Civil Rights Officer evidence of its implementation for the months of October and November 2015.

5/4/15

PUBLIC TRANSIT DIVISION

INDEX CODE: 7-1.3

CATEGORY: Administration

PAGE 1 OF 1

SUBJECT: Paratransit Operations Monitoring

REFERENCES: Transit Operator Contract with DTS

PURPOSE: To establish procedures to monitor the transit operations contractor's compliance with U. S. Department of Transportation paratransit service requirements.

PROCEDURES:

1. The DTS will establish performance measures and standards for the transit operations contractor's paratransit service. These measures will include, but are not limited to: cost per trip, productivity, on-time performance, no-show/late cancellation rate, missed trip rate, telephone access, denials, and trips with excessive time on vehicle compared to fixed route.
2. The transit operations contractor will submit a monthly paratransit performance report. The format of the report will be prescribed by the department. The report will contain operating statistics that include the performance measures and standards established by the DTS. The statistics will include both service directly operated by the transit operations contractor and also service operated by supplemental service providers.
3. The transit operations contractor will submit a copy of the monthly Paratransit Operations Timekeeping Report and copies of the operator manifests used for the National Transit Database sampling. The operator manifests will be used to verify that this source data is accurately reflected in the final monthly paratransit performance report and will also be used to monitor excessive trip lengths, untimely pickups and other operating parameters. Any irregularities or issues will be discussed and resolved with the transit operations contractor's paratransit staff.
4. On a monthly basis, DTS staff will review the monthly paratransit performance report for completeness, accuracy and reasonableness. Any irregularities or issues will be discussed and resolved with the transit operations contractor's paratransit staff. On a quarterly basis, DTS staff will meet with the transit operation contractor's paratransit staff to discuss performance trends and identify methods to address performance measures that are not meeting the performance standards.
5. The transit operations contractor will provide monthly reports on paratransit system performance to the Transportation Commission.

ADOPTED:


MICHAEL D. FORMBY, Director

Amendment 1

Date: MAY - 7 2015

**FY 2015 Triennial Review Final Report
Corrective Action Form**

Review Area: ADA

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By December 31, 2015, the City must submit to the FTA Region IX and X Civil Rights Officer final standards and monitoring procedures, along with evidence of its implementation for the months of October and November 2015.

Action Taken: Prior to June 12, 2015, the City submitted to FTA the approved DTS Standard Operating Procedure (SOP) 7-1.3; "Paratransit Operations Monitoring." This document contains DTS' final procedures for ensuring OTS' and its taxi subcontractor's processes comply with the regulatory requirements for monitoring service provision.

Pursuant to the SOP, DTS staff reviews the Monthly Performance Reports submitted by OTS. In addition, staff reviews paratransit performance using a new Estimated Van Arrival System (EVA). Created by OTS, EVA is a computer application that provides more detailed and timely information about TheHandi-Van service than is available from the monthly Performance and Timekeeping reports. As the information available on EVA is more comprehensive than the OTS reports and driver manifests, our monitoring efforts have focused on EVA and on the monthly summaries provided in the formal Monthly Performance Reports. This

information has helped OTS and DTS assess the quality of the service provided by TheHandi-Van and focus on areas that need improvement.

The attached monitoring logs provide a sample for September and October 2015 with respect to monitoring performance. While the Corrective Action requested monitoring logs for October and November 2015, the November report will not be available in time to meet the December 31, 2015 deadline.

Monitoring Log

September 2015

- 9/10/15 July 2015 Monthly Performance Report – review report.
- EVA System - review 10+ random vehicle manifests with an emphasis on late pick-up times, down MDT list, and OTP reports.
- Observations include: (1) in some manifests, the first pick-up was scheduled prior to the van pull-out time, often resulting in a late pickup and affecting the next several pick-ups. (2) It is not uncommon for several pick-ups at different locations, often subscription trips, to be scheduled for the same pick-up time, resulting in late pick-ups for some riders and affecting the next scheduled pick-ups.
- Contacted OTS for review/explanation. (1) This is normal scheduling procedure for Trapeze, as long as it is scheduled within the 30 minute window. (2) OTS has not had sufficient time to modify the subscription templates, will be done as time permits.
- 9/14/15 EVA System - review 10+ random vehicle manifests with an emphasis on late pick-up times, down MDT list, and OTP reports.
- Observations include those stated earlier. In addition, it appears that the schedule is adversely affected by trips being inserted, affecting pick-up times for an hour or two later.
- 9/16/15 Meet with OTS staff to review EVA manifests. Explanations included several finer points of reading the manifests and how trips are inserted into the schedule while the run is in progress.
- 9/18/15 EVA System - review 10+ random vehicle manifests with an emphasis on late pick-up times, down MDT list, and OTP reports. No new observations.
- 9/23/15 OTS/DTS monthly meeting – discussion included performance measures, and improvements in OTP, as well as increasing staffing levels for operators and reservationists to further improve TheHandi-Van service.
- 9/25/15 August 2015 Monthly Performance Report – review report.
- EVA System - review 10+ random vehicle manifests with an emphasis on late pick-up times, down MDT list, and OTP reports. No new observations.
- 9/29/15 EVA System - review 10+ random vehicle manifests with an emphasis on late pick-up times, down MDT list, and OTP reports. No new observations.

Monitoring Log

October 2015

- 10/8/15 EVA System - - review 10+ random vehicle manifests with an emphasis on late pick-up times, down MDT list, and OTP reports. No new observations.
- 10/13/15 EVA System - - review 10+ random vehicle manifests with an emphasis on late pick-up times, down MDT list, and OTP reports. New observation: approximately 80% of non-subscription trips are scheduled on the hour, implying that Trapeze is not being used fully to schedule trips and reservationists are taking the requested time as the negotiated time.
- Contacted OTS to discuss this observation. OTS stated that there could be several causes for this. One is a reluctance on the part of schedulers to fully use all of the features of Trapeze, accepting the requested time instead of the time suggested by Trapeze, the phone queue may have gotten so long that the system defaulted to allowing the requested time, or if the request came in close to the end of business, the request may have generated a "No Solution Found" and the rider was given the requested time. OTS is aware of this issue and will be following it closely going forward.
- 10/14/15 Review data requested from OTS related to ADA/non-ADA trips. OTS had created a spreadsheet showing sample data of all trips for October 8, 2015, with columns for ADA and non-ADA rides. Results showed less than 2% of trips were non-ADA trips.
- Contacted OTS for review/explanation of several of the field definitions and that I had a correct understanding of the results.
- 10/19/15 EVA System - - review 10+ random vehicle manifests with an emphasis on late pick-up times, down MDT list, and OTP reports. No new observations.
- 10/21/15 September 2015 Monthly Performance Report – review report. Contact OTS regarding discrepancy, pointing out that the "Cost per Trip" calculation was incorrect. OTS corrected this calculation and issued an updated report.
- EVA System - review 10+ random vehicle manifests with an emphasis on late pick-up times, down MDT list, and OTP reports. No new observations.
- 10/28/15 Meeting with OTS for Management Performance Review - discussion included performance measures such as On Time Performance, paratransit operations and Trapeze scheduling software. OTS provided insights on the current status of operations.
- 10/29/15 OTS/DTS monthly meeting – OTS presented the September 2015 Monthly Performance Report and discussion included review of key performance measures, and improvements in OTP, as well as updates on staffing levels for operators and reservationists to further improve TheHandi-Van service. The newer version of Trapeze – Version 14 – will be installed in November.

**FY 2015 Triennial Review Final Report
Corrective Action Form**

Review Area: ADA

Deficiency: D650 - Insufficient oversight of contractors for ADA complementary paratransit

Corrective Action: By June 12, 2015, the City must develop and submit to the FTA Region IX and X Civil Rights Officer DTS interim procedures for ensuring OTS' and its taxi subcontractors' processes comply with the regulatory requirements for monitoring service provision.

By December 31, 2015, the City must submit to the FTA Region IX and X Civil Rights Officer final standards and monitoring procedures, along with evidence of its implementation for the months of October and November 2015.

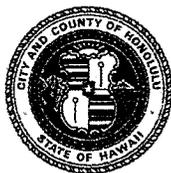
Action Taken: The City submitted to FTA documents to address the corrective actions above prior to each deadline. An electronic message from Ms. Marisa Appleton, FTA Civil Rights Officer for Oversight, to Mr. Mark Au of the City and County of Honolulu (City) on December 14, 2015 stated this response was not sufficient. In a subsequent telephone call between Ms. Appleton, Scott Ishiyama and Eric Stoetzer of the City, Ms. Appleton explained that while the Paratransit Operations Monitoring procedure stated that the City will establish performance measures and standards, it did not specifically state that this action had been completed.

Accordingly, we have attached a letter from the City directing OTS to use performance standards recommended in the latest Short Range Transit Operations Plan, along with the relevant section of this plan.

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

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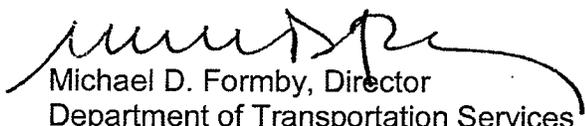
MARK N. GARRITY, AICP
DEPUTY DIRECTOR

PT 638878

January 21, 2016

MEMORANDUM

TO: J. Roger Morton, President and General Manager
Oahu Transit Services, Inc.

FROM: 
Michael D. Formby, Director
Department of Transportation Services

SUBJECT: Short Range Transit Operations Plan Performance Measures

During 2013 and 2014, staff of Oahu Transit Services (OTS) and the Department of Transportation Services (DTS) met several times to review the recommendations outlined in the Nelson\Nygaard Report entitled "Short Range Transit Operations Plan – Tools to Measure Performance (Final)". As a result of those meetings, several changes to OTS policies and procedures were implemented or planned, and changes were made to the Monthly Performance Reports to make them more reader-friendly and informative. At that time there was verbal concurrence that the performance measures recommended in the attached report would be used going forward. We believe the implemented changes and the revised monthly reports have been beneficial to the community and appreciate the effort OTS staff has made.

At this point, we would like to formally direct OTS to use the performance measures outlined in the Nelson\Nygaard Report referenced above for all operations of TheBus, TheHandi-Van and any supplemental special transit service providers to TheHandi-Van. We have attached a hard copy of the report for your reference.

Once again, we appreciate the effort you and your staff have made. Should you have any questions, please contact me at 768-8303.

Attachment

City and County of Honolulu, Department of Transportation Services

Short Range Transit Operations Plan

Tools to Measure Performance

Final

May 2012



Short Range Transit Operations Plan • Tools to Measure Performance

DEPARTMENT OF TRANSPORTATION SERVICES CITY AND COUNTY OF HONOLULU

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Section 3. Paratransit Performance Monitoring

Paratransit operations, by virtue of the fact that they are primarily demand responsive in nature, create some unique performance monitoring requirements. This section details some of these attributes and presents: a set of performance measures typically employed in the industry; the current TheHandi-Van practices related to performance monitoring; and a set of recommended standards and recommendations for improving the monitoring of TheHandi-Van performance.

Purpose of Paratransit Performance Measures

Public transit operators have traditionally established performance measures to evaluate the efficiency and effectiveness of their fixed route transportation services. Transit operators typically use such measures as operating cost per revenue vehicle hour, operating cost per passenger boarding, fare box revenue per operating cost, passenger boardings per revenue vehicle mile, and passenger boardings per revenue vehicle hour. These measures allow transit operators to assess the effectiveness of individual routes by volume, time of day, and day of week for their planning purposes.

Performance measures as applied to paratransit services will incorporate many of the traditional measures of revenue hours/miles per vehicle/passenger. However, some agencies are broadening the way performance is measured, particularly because of the different nature of paratransit versus fixed-route services. Ride statistics such as total number of rides, number of rides denied, average miles per passenger trip and average ride time are being applied to gauge the impact of paratransit services in terms of improving transportation access. Paratransit providers are also beginning to measure their performance in terms of vehicle capacity, instead of the number of vehicles in their fleet, to reflect the mixed fleet used to deliver paratransit services.

Performance measures allow paratransit administrators to:

- Track compliance with certain requirements of the ADA, including on-time performance, trip denials, and access to the reservation system;
- Assess system performance based on their established criteria, and compare that to past measures of performance and target goals.
- Document outcomes and trends related to system efficiency and communicate these to respective policy boards and/or advisory committees that provide program oversight.

Industry Recognized Paratransit Performance Measures and Standards

Performance standards are typically developed in response to the need to show progress to agency goals or to document compliance with regulatory requirements. The following performance measures are used in the industry to assess system productivity and ADA compliance. While there is general agreement on what to measure, there are few industry-accepted standards or target values, again deferring to agency goals (except those related the showing adequate capacity to avoid a pattern of trip denials). The noted indicators are among common performance measures

Short Range Transit Operations Plan • Tools to Measure Performance

DEPARTMENT OF TRANSPORTATION SERVICES, CITY AND COUNTY OF HONOLULU

used for demand response transportation.⁵ These performance measures rely on key performance data, and often expressed as a ratio that normalize costs or benefits per unit of service delivered, for example cost per revenue hour or cost per passenger trip.

- **Cost per revenue hour:** defined as annual operating costs divided by annual vehicle service hours. This measure highlights an agency's cost effectiveness, normalizing operating costs (primarily labor and fuel) to the number of hours the service is provided, which is useful when comparing operations between agencies and when analyzing the impact of service expansion or contraction.
- **Cost per trip:** defined as annual operating costs divided by the number of trips provided. For ADA paratransit services, it is common to include rider companions and attendants in the number of trips (i.e. total boardings). This measure allocates operating costs on a per passenger basis which is often useful when analyzing growth trends or when comparing modes.
- **Cost per revenue mile:** defined as annual operating costs divided by annual vehicle service miles. This measure highlights cost effectiveness, normalized to service miles provided.
- **Trips per hour:** defined as annual boardings (again including attendants and companions) divided by annual vehicle service hours. This productivity measure is a key performance indicator highlighting the number of passengers carried for a unit of service delivered. For demand-response services, it reflects the level of shared rides and amount of slack time in a route.
- **Revenue miles per trip:** defined as annual vehicle service miles divided by the number of annual boardings. This measure can show variations or trends in trip length which is useful when examining factors contributing to the efficiency of a demand-response system (longer trips are harder to schedule with shared rides and create more deadhead time where the vehicle is operating without a passenger onboard).
- **Percent of trips on-time:** defined as the percent of all trips where the passenger is picked up within the allotted appointment time window. This measure is a key performance indicator, especially from the customer's perspective, indicating the reliability of the service.
- **No-show/late cancellation rate:** defined as the percent of scheduled trips where the passenger is a no-show or failed to provide adequate notice that they cannot complete their trip. This measure shows how much unproductive vehicle and driver time is expended making unnecessary trips and not being available to transport other passengers.
- **Advance cancellation rate:** defined as the percent of scheduled trips that were cancelled more than two hours prior to the scheduled pick up time. This measure shows the degree to which the scheduling system has to respond to customer changes, also negatively impacting an agency's ability to efficiently schedule vehicle utilization.
- **Missed-trip rate:** defined as the percent of scheduled trips that were not completed within the scheduled time because the agency vehicle failed to arrive within a scheduled pickup

⁵ Transit Cooperative Research Program (TCRP) Report 124, page 31.

time window. The measure is a key indicator of on-time performance and customer satisfaction.⁶

- **Passenger travel time (on vehicle):** defined the amount of time a passenger has to ride in the vehicle to complete his/her trip but is not typically monitored in the industry. The sampling of individual trips is often used to make sure a customer does not spend an excessive amount of time in a vehicle (especially compared to the equivalent trip time for a fixed-route trip).
- **Hold Time:** defined as the percent of calls answered with a maximum allowable hold time, that is for time spent on hold waiting for a reservationist. This measure provides a reflection of the call center's capacity to handle calls and of customer satisfaction. Other associated measures such as the time to answer a call, or the time before abandonment also provide indicators of the capacity of a call center.
- **Abandoned call rate:** defined as the percent of reservation calls where the customer hangs up before talking with a reservationist. This measure provides a reflection of the call center's capacity to handle calls and of customer satisfaction.
- **Complaint rate:** defined as the number of complaints per 1,000 passenger trips. This measure shows trends in customer satisfaction levels. While the complaint rate shows the level of negative feedback from customers, a commendation rate shows the level of positive feedback.
- **Vehicle availability:** defined as the percent of the fleet available for revenue service. This is not a commonly used indicator, but the mean time between vehicle failures and an agency's ability to address mechanical failures directly impacts operations and capital investments.

Current Process and Standards for Tracking Performance Measures

This section describes the process **currently in use** by TheHandi-Van for tracking performance measures. It identifies the current process for collecting and reporting data, performance measures (formal or informal) recognized by TheHandi-Van, and the review process undertaken by OTS and DTS.

Performance Standards

DTS has not codified a comprehensive set of performance standards for TheHandi-Van. ADA compliance is a primary goal of TheHandi-Van program resulting in DTS and OTS tracking performance to a number of de facto standards associated with ADA paratransit regulations and goals. Some of these measures are specified in DTS' contract with OTS along with suggested

⁶ DTS has established very specific criteria for the definition of a missed trip and specifies that trips completed outside of the scheduled window are also considered as missed trips (Memo From James Burke to J. Roger Morton dated 10.26.07: page 2 Section 3).

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standards. Other unwritten standards have become conventions with the two organizations as part of ongoing service monitoring and performance improvement efforts.

Figure 5 specifies where TheHandi-Van performance measures or standards exist or are implied (as stated objectives or targets). This report concludes by providing a set of strategies for determining TheHandi-Van performance standards where they do not currently exist.

Figure 5 Currently Used Measures

Performance Measure	Applicable TheHandi-Van Target or Objective	Source or Comment	Industry Norm
Cost per revenue hour	N/A	Monitored (1)	Varies based on local labor, insurance, fuel etc. costs.
Cost per trip	N/A	Monitored (1)	Varies based on local labor, insurance, fuel etc. costs.
Cost per revenue mile	N/A	Monitored (1)	Varies based on local labor, insurance, fuel etc. costs.
Trips per hour	Informal goal of 2.00	Target Value is provided in OTS' draft <i>Daily Performance Report</i> .	Between 1.8 and 2.7 for large urban systems (2)
Revenue miles per trip	N/A		Varies based on system design and scheduling priorities
Percent of trips on-time	Informal goal of 95%(Daily Report) and 90% (Monthly Report) (2)	The DTS/OTS Agreement Section 2.2.2 specifies "untimely pick-up" as those over 45 minutes after reserved time. But trips arriving later than 30 minutes after the scheduled pick up are considered late per the OTS practice (per Oct 26,2007 DTS Memorandum), <i>TheHandi-Van Rider's Guide</i> and common industry practice. OTS convention is to classify early arrivals as on-time. Vehicles arriving more than an hour after the scheduled time, even if the rider accepts the trip, are considered "missed trips."	Between 80% and 95% for large urban systems (3)

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Performance Measure	Applicable TheHandi-Van Target or Objective	Source or Comment	Industry Norm
No-show/late cancellation rate	No Shows: <1.5% Late Cancellations: <2.5% Cancelled at door: <3.0%	Objective for FY09 and FY10 is provided in OTS' <i>Paratransit Monthly Performance Report</i>	No Show/Late Cancellation rates greater than 5% are often a point of concern
Advance cancellation rate	Informal goal of 5%	Objective for FY09 and FY10 is provided in OTS' <i>Paratransit Monthly Performance Report</i>	
Trip Denials	0	Identified in daily and monthly reports	Not allowed per the ADA
Missed-trip rate	N/A	Per October 2007 DTS Memorandum missed trips include: (a) vehicle that does not show up for a scheduled pickup; (b) A vehicle arrives after the scheduled pickup window and the passenger either is not there or refuses a ride; (c) A vehicle arrives more than one hour after the negotiated pickup time, and the customer accepts the ride. ⁷	No industry standard; FTA suggests that agencies develop one.
Excessive passenger travel time compared to comparable fixed route travel times	Fixed route equivalent plus twenty minutes (not official, but being used as a development target, access time may change as standard is developed)	DTS/OTS Agreement Section 2.2.4	"Comparable to fixed route travel plus time to and from bus stop"—typically expressed as total time 45-60 minutes, sometimes varying by trip length.
Maximum Hold Time	Informal goals for calls answered: 80% in 2 minutes and 100% in 3 minutes	Target Value is provided in OTS' draft <i>Daily Performance Report</i> .	Industry standards suggest that 91% of calls should be answered within 3 minutes (4)

⁷ Industry standard is more lenient in that a customer who accepts a ride, even if more than one hour late, is not considered "missed trip." Reference *On-Time Performance in ADA Paratransit: Topic Guides on ADA Transportation Number 6, Disability Rights Education & Defense Fund (2010), page 16*

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Performance Measure	Applicable TheHandi-Van Target or Objective	Source or Comment	Industry Norm
Complaint rate	Informal goal of 15 per 100,000 rides	Objective for FY09 and FY10 is provided in OTS' <i>Paratransit Monthly Performance Report</i>	
Vehicle availability	Informal goal of 85%	Objective for FY09 and FY10 is provided in OTS' <i>Paratransit Monthly Performance Report</i>	

(1) Itemized in the Oahu Transit Services Inc. - Paratransit Operations Consolidated Statistical Information Reports. In addition, performance to total budget is monitored with a goal of no variance of actual to budgeted expenses.

(2) The OTS Daily Performance Report Handi-Van operations and OTS Paratransit Monthly Performance Report

(3) TCRP 124 page 55

(4) Recommended Practice for Reservation Hold Times for ADA Complementary Paratransit Call Center (2009).

Data Collection and Performance Reports

OTS prepares several reports to document performance outcomes. These include:

Consolidated Statistical Information Report: This report provides key data points useful in calculating paratransit performance indicators in that it includes: total number of passengers, miles and hours provided during the month. While it also provides calculated cost data such as cost per passenger, cost per mile and cost per hour, expenditure data (actual operating costs) is not provided.

This report is prepared by TheHandi-Van Finance Department, which collects data generated through a variety of sources, including individual trip sheets, payroll records, and the Daily Performance Report, described below.

Daily Performance Report: Daily performance is also tracked for TheHandi-Van operation (Daily Performance Report) which allows OTS staff a more immediate look at service characteristics such as on-time performance, and no-shows. It also includes relevant telephone reservation data such as number of calls answered within 2 (or 3) minutes, and abandoned calls. **Figure 6** highlights the parameters currently tracked in the daily report. Other reports specific to taxi usage are also prepared.

OTS Paratransit Monthly Performance Report: This report summarizes key performance indicators in the categories of: average weekday boardings, fiscal efficiency, service delivery, fleet safety, human resources, and responsiveness to customer contacts.

Samples of these reports are provided in Appendix E.

At present, there is not a single comprehensive report that documents key performance and financial indicators. While the Consolidated Statistical Information report provides some cost data, the report does not reflect other fiscal indicators such as cost per TheHandi-Van or taxi trip; nor is monthly expenditure data captured and presented together with operational data in order to allow key indicators to be calculated.

Figure 6 Parameters Tracked in OTS Daily Report

Parameter
Handi-Van Passenger Reservations
Answered Calls
Abandoned Calls
Calls Answered Within 2 Minutes
Calls Answered Within 3 Minutes
Handi-Van Cancellation/ETA Line
Answered Calls
Abandoned Calls
Calls Answered Within 2 Minutes
Calls Answered Within 3 Minutes

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Handi-Van Schedule Trips
Scheduled Trips Before Denials
Denials
Scheduled Contracted Trips
Scheduled OTS Trips
Handi-Van Actual trips
Actual Trips Before No Shows/Cancellations
PCAs/Companions
No Shows/Late Cancellations/CXL @ door
Advance/Same Day Cancellation
Total Demand Scheduled
Total Subscription Scheduled
On-Time Performance
Passengers Carried
Regular Passengers
Contract Provider Passengers
PCAs
Revenue Hours
OTS/HV Passengers/Revenue Hour
Vehicle Availability
Peak Vehicle Requirement
Vehicles Available
Vehicles in Routine Maintenance
Vehicles Unavailable for > 7 Days
Others
Vehicle Breakdowns/Trouble Calls
Major Vehicle Accidents
Non-Major Vehicle Accidents
Passenger Accidents
Late Van/Run Assignments

The monthly report is reviewed internally by OTS and is sent to DTS. The daily reports are also posted on the intranet and are available for DTS review at any time. DTS has indicated its primary concern with review of performance data is specific to ADA compliance. Therefore, DTS staff focuses on indicators such as trip denials, on-time performance, and time on the vehicle. DTS anticipates developing a plan of action to focus on correcting, if necessary, findings that may emerge from a recently conducted ADA Compliance Review; however, formal communication on the results of the review has not been released.

Recommended Performance Monitoring Strategies

The following strategies are recommended to develop a formal performance monitoring program for TheHandi-Van. These strategies address the need to formalize a performance monitoring program, including the setting of standards and establishing an endorsed reporting mechanism.

1. **Review Peer Performance and Reporting Processes**--OTS and DTS could benefit from examining examples of other agencies' reporting systems. One example is included as Appendix F to this report, that generated by King County Metro's ACCESS Program. It presents a comprehensive monthly report that, in addition to the paratransit program's operational outcomes, also reports on the telephone reservation system outcomes as well as eligibility certification outcomes.
2. **Adopt a set of TheHandi-Van performance measures and standards** – It is important that DTS and OTS monitor performance to a formal and consistent set of targets. Using the suggested set of measures defined in the previous section, this report outlines an initial set of TheHandi-Van measures and standards that will address the basic goals of ADA compliance, efficient operations and customer satisfaction. The standards are based on a combination of industry norms, currently used informal targets and identified benchmarks from performance improvement action plans. This set of measures and standards is presented in **Figure 7** in the following section. It is recommended that the performance measures and standards be reflected in the OTS management agreement with DTS.
3. **Review and update measures and standards on a regular basis** – The set of measures and standards should not be considered static. They should be reviewed on an ongoing basis to account for changing conditions, performance trends and/or new/revised goals. The annual budget review process provides a trigger point to also review the measures and standards. As opposed to updating this report to reflect any changes in the measures and standards, DTS should document updates via a formally approved policy statement or procedure document. Formal approval and archiving will guarantee that both DTS and OTS staff recognize the current set of measures and standards.
4. **Document and audit data sources** – To avoid confusion and assure quality, the source data used to calculate TheHandi-Van measures should be defined in a controlled document. A simple data dictionary can be used to define the measure and identify the source data (e.g. odometer readings, Trapeze reports etc.). As part of this process, the methodology for collecting data should be reviewed and audited on an annual basis to ensure that data collected and reported is reliable and that the process itself is well understood and agreed upon between DTS and OTS. Currently, there is not a high level of confidence in the methods for collecting or reporting data that documents basic program performance,

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particularly data that is generated through Trapeze. This recommendation would support efforts to ensure the baseline data used to document performance indicators is accurate and reliable.

5. **Report out on the entire set of measures** – By inclusion in the approved set of measures and standards, each metric is considered an important gauge of system performance and should be monitored on a regular basis. DTS and OTS management should be able to review financial, operational (both van and taxi), maintenance and customer satisfaction performance via one report on a frequent basis. A concise and comprehensive monthly report should be available for informal review by both management teams. Reports may contain trend data in addition to formal performance monitoring measures.
 - Actual monthly operating expenses for both TheHandi-Van and taxi programs
 - Actual monthly boardings for both TheHandi-Van and taxi programs
 - Average weekday and weekend boardings for both TheHandi-Van and taxi programs
 - Actual service hours
 - Actual service miles

Based on this information, key performance indicators could be derived, such as cost per trip, cost per hour, and cost per mile. It would also be possible to compare the budgeted expenditures to actual costs year-to-date.

Ultimately, this report can also include other program elements, such as results from the Eligibility Center, taxi usage, telephone center statistics, maintenance, safety standards, etc.

6. **Quarterly performance reviews** – DTS and OTS management teams should meet quarterly for a more formal performance review. Performance to standards and trends above and beyond ADA compliance should be discussed to determine if any corrective actions are required.
7. **Develop a performance improvement process** – In addition to shorter-term reactive actions aimed at problem resolution using daily examinations of performance data, OTS should formalize a process to focus on longer-term proactive performance improvement measures as well. The following elements should be included in this process:
 - a. Logging short-term problems and actions - By consistently recording short-term observations and resolutions, staff will be able to recognize repeat problems, trends and otherwise build on lessons learned. This information would be based on OTS staff daily to weekly review of data and investigations and/or corrective actions taken in response to. Historical data on problem identification and resolution should be available for review by DTS and OTS management on an informal basis as desired.
 - b. Quarterly review of longer-term issues – A performance improvement team should work identify non-immediate issues to address including action items, responsibilities and status if carried over from the previous quarter. Status from the performance improvement team should report out DTS and OTS management via the quarterly performance review report.

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Figure 7 Proposed FY 11-12 TheHandi-Van Performance Measures and Standards

Performance Measure	TheHandi-Van Performance Standard	Comment
Cost per service hour	\$90	Based on FY 10 performance plus 3% for inflation. May be adjusted based on budgeted costs
Cost per van passenger	\$39	Based on FY 10 performance plus 3% for inflation. May be adjusted based on budgeted costs
Cost per service mile	\$6.2	Based on FY 10 performance plus 3% for inflation. May be adjusted based on budgeted costs
Trips per hour	2.2	Represents 2007-2009 average productivity. This is somewhat higher than the current target of 2.0, but in line with recent performance.
Service miles per van passenger	5.8	Average over last three years
Percent of trips on-time	90%	Current target is 95% but this is aggressive with respect to industry norms and performance is improving toward 90%.
No-show/late cancellation rate	No Shows: <1.5% Late Cancellations: <2.5% Cancelled at door: <3.0%	Based on recent performance and current targets
Missed Trips	<0.5%	Missed trips are not currently reported; it is recommended that OTS develop a process for measuring and reporting missed trips. Upon review of actual service experience, DTS should move this standard to zero as a pattern and practice of missed trips could be legally construed as a capacity constraint or a trip denial.
Maximum Hold Time (calls answered within 3 minutes)	91%	Industry standard is 91%, current target is 100% and recent performance is in the upper 80s
Complaint rate (per 100,000 trips)	15	Based on previously stated objective

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Performance Measure	TheHandi-Van Performance Standard	Comment
Vehicle availability	80%	Based on current target
Trip denials	None	ADA requirement
Excessive length of time on vehicle compared to fixed route	Not to exceed length of comparable fixed route trip plus 20 minutes	<p>This is a common issue highlighted in FTA funded Topic Guide 6 on ADA Transportation. FTA Letters of Finding make a comparison to the fixed route bus or train system, including time to get to and from the stop or station.</p> <p>A substantial number of excessive length trips is (compared to a comparable trip on fixed route) considered a capacity constraint.</p> <p>Procedure to assess this standard to be explored in more detail during the next phase of the project.</p>

Title VI

**FY 2015 Triennial Review Final Report
Corrective Action Form**

Review Area: Title VI

Deficiency: D62 - Insufficient oversight of Title VI

Corrective Action: By June 12, 2015, the City must submit to the FTA Region IX and X Civil Rights Officers:

- Procedures for monitoring subrecipients for compliance with Title VI requirements.
- An up-to-date subrecipient list.
- The approved Goodwill Industries Title VI program.

Action Taken: The City is submitting the following documents:

- 1) Procedures for monitoring subrecipients for compliance with FTA Title VI (7-1.10 FTA Title VI Subrecipient Oversight)
- 2) DTS' current subrecipients are:
 - Goodwill Industries of Hawaii, Inc.
 - Paratransit, Inc.
 - The Salvation Army
 - Hawaii Helping the Hungry Have Hope (H-5)
- 3) Goodwill Industries of Hawaii FTA Title VI program. DTS and its mobility management contractor continue providing technical support and guidance to Goodwill in developing a program compliant with the FTA's Title VI program requirements. These efforts have resulted in the attached working draft of Goodwill's Title VI program.

Goodwill is a local social service agency contracted under Honolulu's public transit-human services coordinated transportation program. As they are not a traditional transportation provider, they are not familiar with the application of federal regulations to

transit operations. Therefore, they require additional time to ensure that the procedures they are developing are appropriate to ensure that they are properly applying Title VI requirements in their transportation project, to distribute drafts and incorporate comments from all affected personnel, and then to obtain final approval from their Board.

Given the current state of the working draft, Goodwill anticipates that it will need at least until the end of September 2015 to obtain the necessary approval (an e-mail from Goodwill is attached). Therefore, we respectfully request that FTA consider extending the deadline for this deficiency until October 31, 2015. The City will submit Goodwill's final Title VI program to the FTA as soon as it is adopted.

**City Procedures for Monitoring Subrecipients for Compliance
with Title VI Requirements**

PUBLIC TRANSIT DIVISION	INDEX CODE: 7-1.10
CATEGORY: Administration	PAGE 1 OF 2
SUBJECT: FTA Title VI Subrecipient Oversight	
REFERENCES: DTS Subrecipients of FTA Grant Assistance	
<p>PURPOSE: To establish procedures to oversee the compliance of the DTS Public Transit Division's subrecipients of Federal Transit Administration (FTA) grant assistance with the FTA Title VI requirements in Circular FTA C 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, and any subsequent revisions thereto.</p> <p>PROCEDURES:</p> <ol style="list-style-type: none"> 1. <u>Subrecipient Monitoring Methodologies.</u> DTS staff regularly interacts with subrecipients in a variety of ways. These interactions afford the City with opportunities to monitor these entities for FTA Title VI compliance. Key methods are described below: <ul style="list-style-type: none"> • Workshops/Conferences DTS uses conferences and workshops to advance its subrecipients' FTA Title VI program development and implementation and to troubleshoot areas of persistent concern. These meetings also provide a forum through which to provide direct technical assistance to subrecipients. Program managers and staff from projects using FTA funds awarded through a subrecipient agreement with the City participate in these meetings. City staff attends regularly to discuss FTA Title VI issues with these subrecipients. The meeting topics include City staff reports of findings and recommendations on the subrecipients' FTA Title VI program submissions and providing direct technical assistance on FTA Title VI program implementation. • Triennial Reporting Subrecipients are required to submit FTA Title VI program updates to the City every three years, by September 30th. Subrecipients may choose to adopt elements of the City's FTA Title VI program, or they may develop their FTA Title VI program components independently. These triennial submissions give the City the opportunity to assess the sufficiency of its FTA subrecipients' program development and implementation. When deficiencies are found in a subrecipient's program, the City will develop and issue an FTA Title VI work plan for the subrecipient to address the deficiencies, and then follow up with the subrecipient to assist in bringing them into compliance. • On-Site Visits The City's FTA Title VI program contemplates a detailed, on-site review of all subrecipients at least once each year. The review will normally include key FTA Title VI program documents such as the subrecipient's Notice to the Public, complaint procedures, public participation plans, and language access plans. These sessions allow City staff to discuss any findings, to assist subrecipients in strategizing a corrective action plan, and to provide direct technical assistance 	

PUBLIC TRANSIT DIVISION 7-1.10	INDEX CODE:
CATEGORY: Administration	PAGE 2 OF 2
SUBJECT: FTA Title VI Subrecipient Oversight	
REFERENCES: DTS Subrecipients of FTA Grant Assistance	
<p>where needed. To facilitate compliance reviews, subrecipients are required to keep and submit records for review as requested, as well as to provide access to these records.</p> <p>2. <u>Subrecipient Corrective Actions.</u> Effective compliance with the FTA Title VI program requires the City to take prompt action to achieve voluntary compliance by its subrecipients in all instances in which noncompliance is found. If a program or subrecipient is determined to be out of compliance or is believed to be out of compliance with FTA Title VI obligations, the City has three potential remedies:</p> <ul style="list-style-type: none"> • Resolution of the noncompliance status or potential noncompliance status by voluntary means is the first option. This is achieved by entering into an agreement with the subrecipient which then becomes a condition of the subrecipient's continued receipt of FTA financial assistance from the City. • Where voluntary compliance efforts are unsuccessful, a refusal to grant or continue the assistance to the subrecipient may be initiated. • Where voluntary compliance efforts are unsuccessful, the violation is referred to FTA, which will then forward it to the U.S. Department of Justice for judicial consideration. <p>The City will make every effort to obtain compliance of its FTA subrecipients through voluntary corrective action.</p>	
ADOPTED:	
 <hr/> MICHAEL D. FORMBY, Director	Amendment <i>n/a</i>
Date: <u>6/19/2015</u>	

Draft Goodwill Industries Title VI Program

Ishiyama, Scott

From: Carol Taira [CTaira@higoodwill.org]
Sent: Monday, June 08, 2015 2:17 PM
To: Ishiyama, Scott
Subject: Review and implementation of Title VI provisions

Hi Scott:

Thank you for your assistance with the implementation of the Title VI provisions.

As we discussed, since the Title VI plan will require governing body approval, Goodwill Industries of Hawaii, Inc. will need at least until the end of September 2015, to be able to obtain the required approval.

Let me know if you have any questions.

Carol J. Taira
Vice President of Finance
Goodwill Industries of Hawaii, Inc.
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Honolulu, HI 96819
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6/8/2015

Title VI Program FFY 2015-2017

for compliance with
FTA Title VI Circular 4702.1B

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1.0 Introduction

1.1 Goodwill Industries of Hawaii, Inc.

Goodwill Industries of Hawaii, Inc. is a 501 (c)(3) non-profit corporation that helps people with employment barriers to reach their full potential and become self-sufficient.

Since 1959, Goodwill has provided job placement, career development, education, training, employment and support services for people throughout the state. Over 10,000 Hawaii residents each year have benefitted from Goodwill's services, and thousands have found employment in our community.

Working in collaboration with the City and County of Honolulu Department of Transportation Services, Goodwill provides transportation services under the auspices of two Mobility Management projects, the Kalaeloa Shuttle and Agency Provided Trips. These projects receive Federal Transit Administration (FTA) JARC and New Freedom funds:

- The Kalaeloa Shuttle was designed to complement Route 415 of the City's fixed-route bus system and provide service during periods when Route 415 is not operating, including weekends and off-peak times. The Shuttle provides daily fixed-route service along a 7 mile loop in Kapolei. Although the Shuttle was primarily designed to provide transportation for residents of transitional housing shelters in the Kalaeloa area, anyone can use the Shuttle to travel along the loop.
- Agency Provided Trips provides individuals who participate in Goodwill's Adult Day Health (ADH) program with daily trips on Goodwill vehicles operated by Goodwill staff to and from program sites in Kapolei and Kilihau. These clients would otherwise be utilizing the American with Disabilities (ADA) paratransit service on Oahu.

1.2 Requirements and Guidance

As a condition of Goodwill's funding from the Federal Transit Administration (FTA) through subrecipient agreements with the City and County of Honolulu Department of Transportation Services, Goodwill is required annually to submit Certifications and Assurances. In addition, on a triennial basis, Goodwill is required to submit to the DTS evidence documenting compliance with FTA Circular 4702.1B on Title VI of the Civil Rights Act of 1964, which states in Section 601:

No person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

There are two Presidential Executive Orders that place further emphasis upon Title VI protections of race and national origin.

- Executive Order #12898 directs federal agencies to develop strategies to address disproportionately high and adverse human health or environmental effects of their programs on minority and low-income populations.
- Executive Order #13166 directs federal agencies to evaluate services provided and implement a system that ensures that persons with Limited English Proficiency are able to meaningfully access the services provided consistent with and without unduly burdening the fundamental mission of each federal agency. Additionally, each federal agency shall ensure that recipients of federal financial assistance provide meaningful access to their Limited English Proficiency applicants and beneficiaries.
- Circular 4703.1 went into effect on August 15, 2012 to provide recipients of FTA financial assistance with guidance to incorporate environmental justice principles into plans, projects and activities that receive funding from FTA.
- Circular 4702.1B went into effect on October 1, 2012 to assist grantees in complying with Title VI of the Civil Rights Act of 1964. The purpose of this Circular is to provide recipients of FTA financial assistance with instructions and guidance necessary to carry out the US Department of Transportation's Title VI regulations (49 CFR part 21).

2.0 General Requirements

2.1 Notice to the Public

Requirement: All recipients must provide a copy of the recipient's Title VI notice to the public that indicates that the recipient complies with Title VI, and informing members of the public of the protections against discrimination afforded to them by Title VI, as well as a list of locations where the notice is posted.

Policy: Goodwill posts its Title VI notice in English in the public portions of its Administration building located at 2160 Kilihau Street and online at www.goodwillhi.org. A sample Notice to the Public, along with a Title VI Poster, is included in Appendix 4.

2.1 Complaint Procedures and Form

Requirement: All recipients must provide a copy of instructions to the public regarding how to file a Title VI discrimination complaint, including a copy of the complaint form.

Policy: The procedure for filing a Title VI complaint can be found online at www.goodwillhi.org and may also be obtained from Goodwill's Administrative Office at 2610 Kilihau Street, Honolulu HI 96819. Goodwill staff is available to assist complainants with filing a Title VI complaint.

Goodwill has developed procedures for filing, tracking and investigating Title VI complaints. The procedures, including a complaint form provided by Goodwill are included in Appendix 2.

2.2 Investigations, Complaints and Lawsuits

Requirement: All recipients must provide a list of any public transportation related Title VI investigations, complaints and lawsuits filed with the recipient since the time of the last submission.

Policy: Goodwill has developed procedures for tracking and monitoring Title VI complaints and lawsuits and has procedures for investigation of complaints.

2.3 Inclusive Public Involvement

Requirement: Pursuant to 49 CFR 21.5(b)(7), and to engage in community outreach consistent with the DOT Order on Environmental Justice, recipients and sub-recipients shall seek out and consider the viewpoints of minority and low income populations in the course of conducting public outreach and involvement activities. An agency's public

participation plan shall offer early and continuous opportunities for the public to be involved in the identification of social, economic and environmental impacts of proposed transportation decisions.

Policy: Goodwill staff is actively involved in organized community and local advisory groups and makes ongoing efforts to assist clients who have limited English proficiency.

2.4 Language Assistance Plan

Requirement: All recipients are required to provide a Language Assistance Plan (LAP), which specifies policies and procedures for providing language assistance to LEP populations, in accordance with U.S. Department of Transportation LEP Guidance.

2.4.1 Four Factor Analysis

The U.S. Department of Transportation (DOT) issued its *Policy Guidance Concerning Recipient's Responsibilities to Limited English Proficiency (LEP) Persons*. This policy states that DOT recipients are required to take reasonable steps to ensure meaningful access to programs by LEP persons. There are four factors for agencies to consider when assessing language needs and determining what steps they should take to ensure access for LEP persons, regardless of whether or not the agency chooses not to prepare a written LEP plan:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity or service of the recipient;
2. The frequency with which LEP individuals come in contact with the program;
3. The nature and importance of the program, activity or service provided by the recipient to people's lives; and
4. The resources available to the recipient and costs.

A brief description of the self-assessment undertaken in each of the areas follows.

2.4.1a The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity or service of the recipient.

Kalaeloa Shuttle

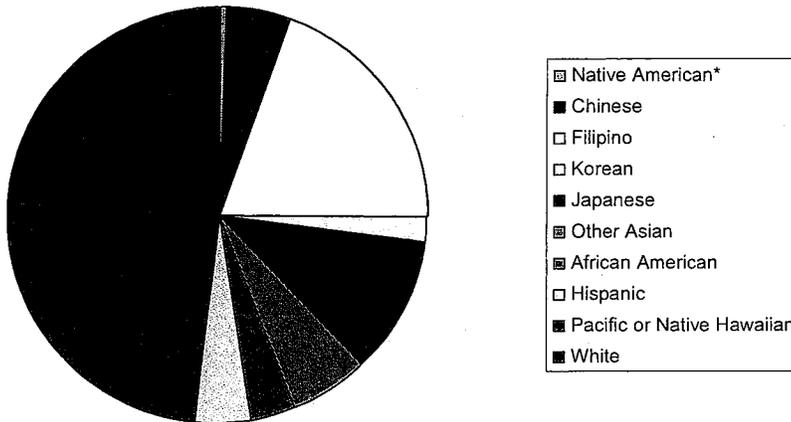
The Kalaeloa Shuttle operates in the Kapolei area of Oahu and serves a transient population that mirrors the ridership of the fixed route service on the island. Using data reported by the fixed route service, TheBus, the population and ridership characteristics of the service area can be summarized using both U.S. Census data and ridership survey data.

Ethnic Groups

Ethnic groups in Honolulu are extremely diverse. Among the ridership, three groups dominated; Filipinos, Whites and Pacific Islanders or Native Hawaiians.

Figure 1

Ridership by Ethnicity

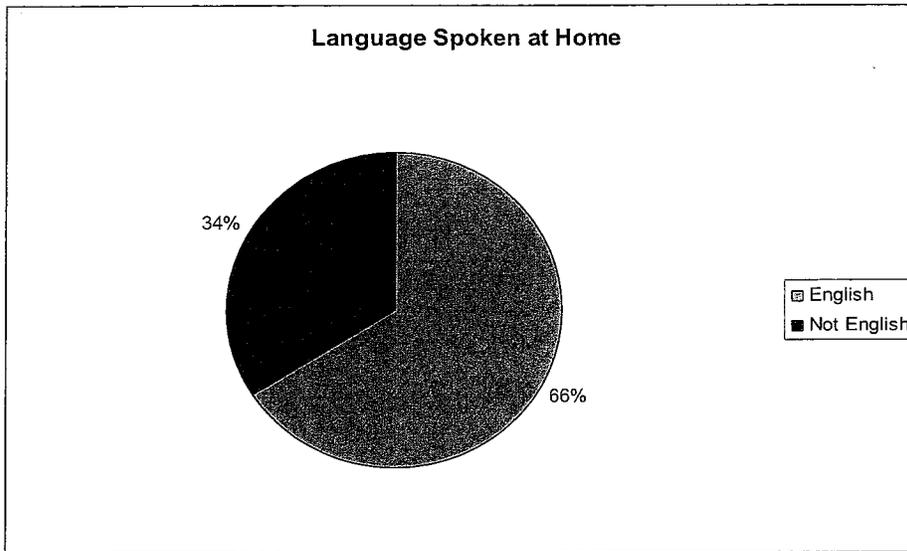


* Survey question reads American Indian or Alaska Native

Language Spoken at Home

A corollary of ethnicity is the language a person speaks at home, as illustrated in the following graph. It is recognized that non-English speakers face additional challenges when accessing mass transit. Over 100 languages other than English were used at home by the riders.

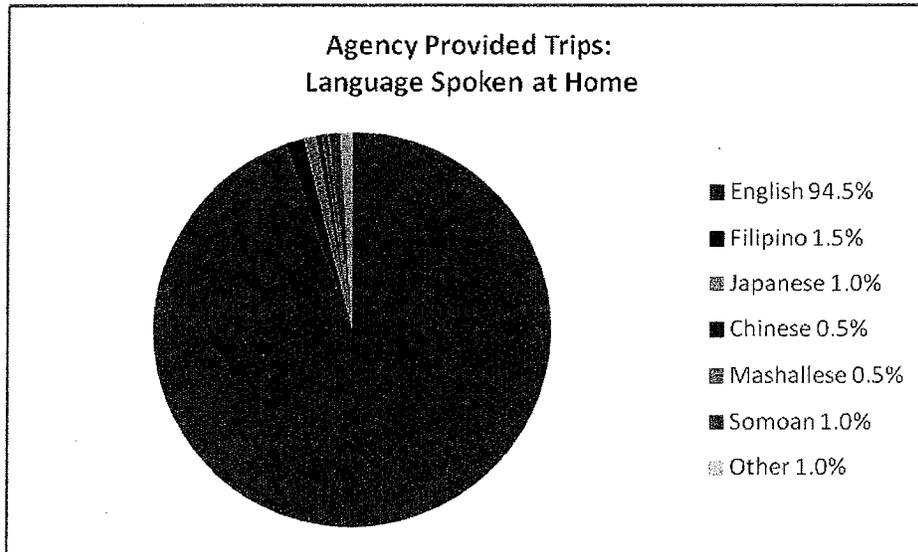
Figure 2



Agency Provided Trips

For individuals who participate in Goodwill's Adult Day Health (ADH) program, information from all participants is collected upon enrollment to ascertain the primary language spoken at home. ADH clients participate in the Agency Provided Trips project, funded through New Freedom grants. Figure 3 on the following page illustrates the percentages of primary languages spoken at home.

Figure 3



2.4.1b The frequency with which LEP individuals come in contact with the program.

Goodwill has assessed the frequency at which staff has or could possibly have contact with LEP persons. This includes examining census data, client enrollment data, phone inquiries, requests for translated documents and staff feedback.

2.4.1c The nature and importance of the program, activity or service provided by the recipient to people's lives.

Public transportation is vital to many people's lives. According to the Department of Transportation's *Policy Guidance Concerning Recipient's Responsibilities to Limited English Proficient (LEP) Persons*, "Providing public transportation access to LEP persons is crucial. An LEP person's ability to utilize effective public transportation may affect his or her ability to obtain health care, or education, or access to employment."

2.4.1d The resources available to the recipient and costs

Goodwill assessed its available resources that are currently being used, and those that could be used, to provide language assistance. Within the limited funding available for the Kalaeloa Shuttle and Agency Provided Trips, Goodwill provides a reasonable degree of services for limited English speaking persons.

2.5 Interactions with the Limited English Proficiency Population

Goodwill employs the following to ensure meaningful input is received:

- Goodwill ensures that its staff is available to work with customers who speak Japanese, Chinese and other Asian/Pacific Island languages.
- When customers communicate with Goodwill and state a language preference, requested materials are provided in the requested language.
- Notices that are posted on the Kalaeloa Shuttle and Agency-Provided Trips vehicles are provided in English. Notices will contain a statement directing individuals to contact Goodwill if assistance is needed in another language. This statement will appear both in English and in any languages spoken by LEP populations that exceed the Safe Harbor threshold (see Section 2.7, Safe Harbor Provisions).

2.6 LEP Training and Implementation by Goodwill staff

Goodwill employs the following to ensure meaningful input is received:

- When new hires start employment, Goodwill management distributes an Administrative Handbook that contains all Agency policies and procedures. The Administrative Handbook will be updated to include Goodwill's policy on outreach to and communication with limited-English speaking persons.
- As new policies/procedures are developed, or existing policies/procedures are amended, these new documents are distributed to affected employees through various methods, including but not limited to paper distribution, electronic documents, postings in employee break rooms, and scheduled group or individual training sessions.
- Kalaeloa Shuttle and Agency-Provided Trips operators, who are the most direct point of contact for LEP persons, have several methods to respond to an LEP

individual. If vehicle operators are not bilingual, they are instructed to ask for assistance from a bilingual passenger. In cases where there is no one on the bus who can offer language assistance when needed, the vehicle operator contacts Goodwill for assistance.

2.7 Safe Harbor Provisions

The Safe Harbor requirements state, "if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally."

Translation of vital documents for the Kalaeloa Shuttle will be provided in the same languages as TheBus, as shown below. If information is needed in another language, consumers can contact Goodwill at 808-836-0313.

- Japanese
- Ilocano
- Korean
- Chinese
- Vietnamese

As shown in Figure 3 above, there are no language groups for Agency Provided Trips clients that exceed the Safe Harbor threshold.

2.8 Monitoring, Evaluation and Updates to the plan

The Goodwill of Hawaii, Inc. Title VI program and Language Assistance Plan are designed to be living documents that are updated accordingly. Goodwill monitors its services and service area statistics:

1. Through contact with our clients
2. Through updated information from TheBus
3. Through formal comments obtained by the public and local officials
4. Through outreach with other human service agencies on their changing customer demographics.

Based on the information received, Goodwill reviews all comments and updates the plan and outreach documents accordingly. All data is reviewed as needed and at a minimum, a new plan is updated and adopted by the Board every three years.

2.9 Committee and Board Composition

Committee and Board Composition Requirement: Recipients that have transit-related, non-elected planning boards, advisory councils or committees or similar bodies, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees and a description of efforts made to encourage the participation of minorities on such committees or councils.

Policy: Goodwill does not have any non-elected planning boards, advisory councils or committees, or similar bodies.

2.10 Construction Projects

Requirement: If the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.

Title 49 CFR Section 21.9 (b)(3) states, "In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the ground of race, color or national origin."

Title 49 CFR part 21, Appendix C, Section (3) (iv) provides, "The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color or national origin."

For the purposes of this requirement, "facilities" does not include bus shelters, as these are transit amenities and are covered in Chapter IV of Circular 4702.1B, nor does it include transit stations, power substations, etc., as those are evaluated during project development and the NEPA process. Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc.

Policy: Goodwill did not have any construction projects, as defined by this regulation, during the time since the last program submittal.

2.11 Subrecipient Monitoring

Recipients shall include a narrative or description of efforts used to ensure subrecipients are complying with Title VI, as well as a schedule of subrecipient Title VI program submissions.

Policy: Goodwill does not have any pass-through agreements with subrecipients and no such agreements are expected during the term of this Title VI plan.

2.12 Board Approval

Requirement: A copy of board meeting minutes, resolution, or other appropriate documentation showing the Board of Directors reviewed and approved the Title VI program must be included.

Policy: This Title VI update will be posted to the Goodwill website once approved by Goodwill and is scheduled to go to the Board of Directors at its July 2015 meeting.

2.13 Required Submission of the Title VI Program

To ensure compliance with 49 CFR Section 21.9 (b), FTA requires that all recipients document their compliance by submitting a Title VI program to FTA's regional civil rights officer once every three years.

3.0 Requirement for Fixed Route Transit Providers

3.1 System-Wide Service Standards and Policies

Requirement: In accordance with Chapter IV of FTA Circular 4702.1B, fixed route transit providers shall set system-wide service standards and policies for each fixed route mode of service they provide. Service standards and policies shall be developed for the following indicators: (1) vehicle load, (2) vehicle headway, (3) on-time performance, (4) service availability, (5) distribution of transit amenities, and (6) vehicle assignment.

Title 49 CFR part 21, Appendix C, Section (3)(iii) provides, "[n]o person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of service of transportation service furnished as a part of the project on the basis of race, color, or national origin. Frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes may not be determined on the basis of race, color, or national origin."

Policy: Goodwill adheres to the following Service Standards and Policies for its single fixed route in the Kalaeloa area:

1. Vehicle Load

2. Vehicle Headway
3. On-Time Performance
4. Service Availability
5. Distribution of Transit Amenities
6. Vehicle Assignment

Vehicle Load

The maximum vehicle load factor is 1.5. No more than 1% of trips may have a vehicle load that exceeds this level for a duration greater than 5 minutes.

Vehicle Headway

Service operates every 90 minutes or better, seven days a week. On weekdays, service should begin no later than 7:00 a.m. and continue until 7:30 p.m. On weekends, service should begin no later than 8:30 a.m. and continue until 4:00 p.m.

The Kalaeloa Shuttle route was designed to complement Route 415 of the City's fixed-route bus system and provide service during periods when Route 415 is not operating, including weekends and off-peak times. Service should adhere to the standards above, except during periods when Route 415 of the City's fixed-route system is operating.

On-Time Performance

A vehicle is considered "on-time" if it departs the route origin and arrives at the route destination between zero and five minutes late in comparison to the published schedule. At least 80% of all scheduled runs should be completed on-time.

Service Availability

Goodwill does not have the authority to make decisions regarding the distribution of routes. Goodwill is only contracted to operate service along a single fixed route in the Kalaeloa area as a complement to Route 415 of the City's fixed-route bus system.

Distribution of Transit Amenities

Goodwill does not have the authority to make decisions regarding the siting of transit amenities.

Vehicle Assignment

There are currently two vehicles in the active fleet, including one 15-passenger van and one wheelchair-accessible bus. A minimum of one wheelchair-accessible vehicle will be assigned to this route seven days a week.

4.0 General Reporting Requirements

Chapter III of FTA Circular 4702.1B speaks to the general reporting requirements required of recipients of FTA funding and its subrecipients to ensure that their activities comply with the DOT Title VI regulations and the DOT Guidance on Limited English Proficiency (LEP). Summaries of these requirements and Goodwill's efforts in meeting them are outlined below.

4.1 Annual Title VI Assurance

Applicants shall submit their annual Title VI assurance as part of their annual Certification and Assurances submission to FTA. Recipients shall collect Title VI assurances from subrecipients prior to passing through FTA funds (these Title VI assurances can be submitted as part of a standard list of assurances provided by subrecipients to their direct recipient).

Goodwill annually submits its Certifications and Assurances to the City and County of Honolulu, Department of Transportation Services as a subrecipient of Job Access Reverse Commute and New Freedom funds. Goodwill's latest signed copy of the Certifications and Assurances is included in this document as Appendix 1.

4.2 Notifying Beneficiaries of Protection

In order to comply with 49 CFR Section 21.9 (d), recipients and subrecipients shall provide information to beneficiaries regarding their Title VI obligations and appraising beneficiaries of the protections against discrimination afforded to them by Title VI.

Goodwill has established a Policy Statement, per Title VI, for those who are benefiting from services, and/or contracts, funded with federal assistance and has made that Policy Statement available to the public. This Policy Statement addresses Goodwill's commitment to avoiding discrimination on the basis of race, color or national origin. In addition, Goodwill has developed an Implementation Procedure and Complaint Process that provides the following additional information:

- A description of Title VI and the civil rights protections it affords
- Instructions on how to file a Title VI complaint
- A description of the process for handling complaints and notifying the complainant
- A description of who can file complaints and where to file them

Goodwill's "Policy Statement on Non-Discrimination and Title VI Civil Rights Protections," which includes a public notification of rights, is shown in Appendix 3. All of

these documents can be translated into various languages upon request. In addition, Goodwill's Title VI Policy Statement and Implementation Procedure are included on Goodwill's web site at www.goodwillhi.org.

Appendix 1: Certifications and Assurances

(67 page document inserted here)

Appendix 2: Title VI Complaint Procedures

Title VI Complaint Procedure Guidelines

A. SCOPE OF TITLE VI COMPLAINTS

Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI may individually or through a legally authorized representative make and sign a complaint and file the complaint with Goodwill Industries of Hawaii. . Allegations received do not have to use the key words "complaint," "civil rights," "discrimination," or even their near equivalents. It is sufficient if such allegations imply any form of unequal treatment in one or more of our programs for it to be considered and processed as an allegation of a discriminatory practice.

B. GOODWILL TITLE VI PUBLIC NOTICE PROCESS

Goodwill has given assurance for the protection of the general public in accordance with Title VI. Goodwill, by a public notice process, affords the general public an opportunity to formally complain with regard to the Agency's treatment of Agency activities as they may adversely affect some. Public notices relating to Goodwill's Title VI Complaint Procedures shall be published annually in newspapers having a general circulation in the vicinity of proposed projects. As a minimum, such public notice shall contain the following:

1. Goodwill's assurance of compliance with Title VI of the Civil Rights Act of 1964 and Departmental Policy concerning non-discrimination in all Goodwill's activities.
2. Public right to file complaints.
3. One hundred eighty (180) calendar day time limit for filing of complaints.
4. Complaint filing procedure. An example of such "Goodwill's Notice to the Public" is included as Appendix 4.

Title VI, Environmental Justice, and Limited English Proficiency Complaint Form

Rev. June 4, 2015

Title VI, Civil Rights Act, 1964 states "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal financial assistance." Two Executive Orders extend Title VI protections to Environmental Justice, which also protects persons of low income, and Limited English Proficiency (LEP).

Please provide the following information necessary in order to process your complaint. Assistance is available upon request. If information is needed in another language, please call Goodwill at 808-836-0313. Complete this form and mail or deliver to:

Goodwill Industries of Hawaii, Inc. ATTN: Title VI Coordinator 2610 Kilihau Street Honolulu, HI 96819 www.higoodwill.org (808) 836-0313	<u>OR</u>	Department of Transportation Services - Paratransit Operations Branch City and County of Honolulu Frank F. Fasi Municipal Building 650 King Street, Third Floor Honolulu, HI 96813-3071
--	------------------	--

1. Complainant's Name: _____

2. Address: _____

3. City: _____ State: _____ Zip Code: _____

4. Telephone No. (Day): _____ (Evening): _____

5. Person discriminated against (if other than complainant)

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

6. What was the discrimination based on? (Check all that apply):

- _____ Race/Color _____ National Origin
_____ Low Income _____ Limited English Proficiency

7. Date of incident resulting in discrimination: _____

8. Describe how you were discriminated against. What happened and who was responsible?
For additional space, attach additional sheets of paper or use back of form.

9. Did you file this complaint with another Federal, state, or local agency; or with a Federal or state court? (Check appropriate space) _____ Yes _____ No

If answer is yes, check each agency complaint was filed with:

Federal Agency _____ Federal Court _____ State Agency _____
State Court _____ Local Agency _____ Other _____

10. Provide contact person information for the agency you also filed the complaint with:

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Date Filed: _____

11. Sign the complaint in the space below. Attach any documents you believe support your complaint.

Complainant's Signature

Signature Date

Goodwill Title VI Complaint Log

DATE: _____ Completed by: _____

Phone: _____

email: _____

Date	Summary	Status	Action(s) Taken
------	---------	--------	-----------------

(Month, Day, Year) (include basis of complaint: race, color, or national origin)

Investigations

1.

2.

Lawsuits

1.

2.

Complaints

1.

2.

64 11 22

Appendix 3: Policy Statement of Non-Discrimination and Title VI Civil Rights Protections

Goodwill Industries of Hawaii, Inc.

Policy Statement on Non-Discrimination

Goodwill Industries of Hawaii, Inc. treats its customers with respect, integrity, and loyalty.

The Board of Directors of Goodwill Industries of Hawaii, Inc., takes this opportunity to express that one of its highest priorities in the area of operating federally-funded transportation programs is to ensure that administration of Goodwill of Hawaii, Inc., and federally-funded programs administered by Goodwill, operate with the common goal of providing equal opportunity to federally-funded staff and participants.

Goodwill of Hawaii, Inc. operates its programs without regard to race, color, creed, national origin, religion, sex, sexual preference, marital status, age, medical condition, or disability in accordance with Title VI of the Civil Rights Act, or other applicable law. For more information, contact Goodwill's Administrative Office at (808) 836-0313.

Goodwill Industries of Hawaii, Inc. will take positive measures toward eliminating architectural barriers, artificial barriers and achieving equal opportunity through its continued implementation of its Affirmative Action Program.

Goodwill of Hawaii, Inc. will also take positive measures to accomplish its objectives of the program and to ensure that no person is discriminated against because of sex, age, race, creed, color, handicap, religion, national origin, political affiliation or belief, or heritage.

The Board of Directors specifically prohibits any form of sexual harassment within Goodwill, or any federally funded program. Any federally-funded staff member, participant, or applicant to a federally funded program who feels he or she has been discriminated against, should contact Goodwill's Administrative office by telephone at 808-836-0313 or in writing at 2610 Kilihau Street, Honolulu, HI 96819.

Policy Statement on Title VI Civil Rights Protections

The Civil Rights Act of 1964, Title VI, states that "No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

Goodwill of Hawaii, Inc. is committed to complying with the requirements of Title VI in all of its federally funded programs and activities.

Filing a Title VI Complaint

Persons who believe they have been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint with Goodwill Industries of Hawaii, Inc. For information on filing a complaint, contact Goodwill's Administrative Office. Complaints must be in writing and must be filed within 180 days following the date of the alleged discriminatory occurrence.

Phone: 808-836-031

Mail: Goodwill of Hawaii, Inc.

2610 Kilihau Street

Honolulu, HI 96819

Appendix 4: Public Notification

- **Sample Notice to Public**
- **Title VI Poster**



Sample Notice to the Public

- Goodwill Industries of Hawaii, Inc. operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Goodwill Industries of Hawaii, Inc.
- For more information on the Goodwill Industries of Hawaii, Inc. civil rights program and the procedures to file a complaint, go to www.goodwillhi.org
- Complaints must be filed in person or in writing. Complaints should be directed to:
Goodwill Industries of Hawaii, Inc.
Attn: Title VI Officer
2160 Kilihau Street
Honolulu, HI 96819
- A complainant may file a complaint directly with the City and County of Honolulu Department of Transportation Services:
Department of Transportation Services - Paratransit Operations Branch
City and County of Honolulu
Frank F. Fasi Municipal Building
650 King Street, Third Floor
Honolulu, HI 96813-3071
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint at:
Federal Transit Administration, Office of Civil Rights
Attn: Title VI Program Coordinator
East Building, 5th Floor-TCR
1200 New Jersey Ave., SE
Washington, DC 20590
- If information is needed in another language, contact Goodwill Industries of Hawaii at 808-836-0313.

Comment [s1]: This statement to appear in LEP languages that exceed the Safe Harbor threshold.



NON-DISCRIMINATION TITLE VI POSTER

Title VI and Nondiscrimination Commitment (FTA):

Pursuant to Title VI of the Civil Rights Act of 1964 and related laws and regulations, Goodwill Industries of Hawaii, Inc. will not exclude from participation in, deny the benefits of, or subject to discrimination anyone on the grounds of race, color and national origin.

Complaint Procedures:

Goodwill Industries of Hawaii, Inc. has established a discrimination complaint procedure and will take prompt and reasonable action to investigate and eliminate discrimination when found. Any person who believes that he or she has been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with Goodwill Industries of Hawaii, Inc. Any such complaint must be in writing and filed with Goodwill Industries of Hawaii, Inc. within one hundred eighty (180) calendar days following the date of the alleged discriminatory occurrence. For more information, please contact Goodwill Industries of Hawaii, Inc.

ADA/504 Statement:

Pursuant to Section 504 of the Rehabilitation Act of 1973 (Section 504), the Americans with Disabilities Act of 1990 (ADA) and related federal and state laws and regulations, Goodwill Industries of Hawaii, Inc. will make every effort to ensure that its facilities, programs, services, and activities are accessible to those with disabilities. Goodwill Industries of Hawaii, Inc. will provide reasonable accommodation to disabled individuals who wish to participate in public involvement events or who require special assistance to access Goodwill Industries of Hawaii, Inc. facilities, programs, services or activities. Because providing reasonable accommodation may require outside assistance, organization or resources, Goodwill Industries of Hawaii, Inc. asks that requests be made at least five (5) calendar days prior to the need for accommodation. Questions, concerns, comments or requests for accommodation should be made to Goodwill Industries of Hawaii, Inc.

Accommodation services are provided free without charge for individuals with special needs with disabilities. Any fees will be paid by the recipient or subrecipient. The public will have access to translators, TTY/TDD services and vital documents translated when requested.

If information is needed in another language, please call Goodwill at 808-836-0313.

Comment [si2]: This statement to appear in LEP languages that exceed the Safe Harbor threshold.

**FY 2015 Triennial Review Final Report
Corrective Action Form**

Review Area: Title VI

Deficiency: D62 - Insufficient oversight of Title VI

Corrective Action: By June 12, 2015, the City must submit to the FTA Region IX and X Civil Rights Officers:

- Procedures for monitoring subrecipients for compliance with Title VI requirements [submitted to FTA in the City's 6/12/15 response].
- An up-to-date subrecipient list [submitted to FTA in the City's 6/12/15 response].
- The approved Goodwill Industries Title VI program.

Action Taken: Goodwill Industries of Hawaii's Title VI program and a copy of their Board of Directors resolution approving the program are attached. We appreciate the support of the FTA's Office of Civil Rights in granting several extensions due to unforeseen delays in Goodwill's efforts to develop their Title VI program.