



U.S. Department
of Transportation

**Federal Transit
Administration**

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September 28, 2021

The Honorable Bill Magers
Chair, Board of Directors
Texoma Area Paratransit System, Inc.
6104 Texoma Parkway
Sherman, TX 75090

Re: Federal Transit Administration (FTA) Fiscal Year 2021 Triennial Review Final Report

Dear Judge Magers:

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

The Triennial Review focused on TAPS' compliance in 21 areas. No deficiencies were found with the FTA requirements in 19 areas. Deficiencies were found in 2 areas: Financial Management and Capacity and Procurement. TAPS had no repeat deficiencies from the 2017 Triennial Review.

Given the delay in completing the FY 2020 reviews until FY 2021 and the significant amount of additional Federal financial support provided through CARES Act, FTA developed a supplement to the FY 2020 Contractors' Manual to assist in the evaluation of how recipients have used CARES Act and Emergency Relief funding. This supplement details the specific flexibilities and administrative relief provided by FTA for the use of these funds.

Regulations and Guidance

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

Public Transportation Agency Safety Plan (PTASP) Regulation

The PTASP regulation requires all operators of public transportation systems that are recipients and subrecipients of FTA's Urbanized Area Formula Grants (Section 5307) to develop safety plans that include the processes and procedures to implement Safety Management Systems (SMS). FTA has deferred applicability of this requirement for operators that only receive funds through FTA's Enhanced Mobility of Seniors and Individuals with Disabilities Formula Program (Section 5310) and/or Rural Area Formula Program (Section 5311).

As part of the Annual Certifications and Assurances, transit operators must certify they have a safety plan in place for meeting the requirements of the rule by July 20, 2020. However, in response to the COVID-19 public health emergency, on December 11, 2020, FTA issued a Notice of Enforcement Discretion, effectively extending the PTASP compliance deadline to July 21, 2021. All plans will be reviewed starting October 1, 2021 through FTA's oversight process. For guidance and updates to assist in the preparation and implementation of the PTASP Final Rule, please visit FTA's website at www.transit.dot.gov/PTASP.

Random Drug Testing Rate Increase

On October 17, 2018, FTA published a dear colleague letter "2019 Random Drug Testing Increase." In its letter, FTA notified recipients that effective January 1, 2019 and as mandated by its drug and alcohol regulation at 49 C.F.R. 655.45, the random drug testing rate will change. FTA increased the minimum rate of random drug testing from 25 percent to 50 percent of covered employees, for employers subject to FTA's drug and alcohol regulation. This increased random drug testing rate results from an uptick in the proportion of violations identified through random drug testing.

The 50 percent random drug testing rate applies to entities receiving Federal assistance under 49 U.S.C. 5307, 5309, 5311 or 5339, including recipients, subrecipients, and safety-sensitive contractors. The required minimum rate for random alcohol testing is unaffected and remains at 10 percent.

Thank you for your cooperation and assistance during this Triennial Review. If you need any technical assistance or have any questions, please do not hesitate to contact Mr. Dominic LoMurro, Financial Analyst, at (817) 978-0568 or by email at dominic.lomurro@dot.gov.

Sincerely,

Donald R. Koski
Acting Regional Administrator

Enclosure

cc: Shellie White, General Manager, TAPS

FINAL REPORT

**FISCAL YEAR 2021
TRIENNIAL REVIEW**

of

**Texoma Area Paratransit System, Inc.
(TAPS)
Sherman, Texas
ID: 6995**

Performed for:

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

Prepared By:

Qi Tech, LLC

Scoping Meeting Date: February 18-20, 2020

Desk Review: June 13, 2021

Virtual Site Visit Date: July 29, 2021

Draft Report Date: September 28, 2021

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Executive Summary

This report documents the Federal Transit Administration’s (FTA) Triennial Review of the Texoma Area Paratransit System, Inc. (TAPS) of Sherman, Texas. FTA wants to ensure that awards are administered in accordance with the requirements of Federal public transportation law 49 U.S.C. Chapter 53. The review was performed by Qi Tech, LLC. During the virtual site visit, administrative and statutory requirements were discussed and documents were reviewed.

The Triennial Review focused on TAPS’ compliance in 21 areas. Deficiencies were found in the areas listed below.

Review Area	Deficiencies	
	Code	Description
Financial Management and Capacity	F2-3	ECHO draws not properly approved
Procurement	P10-2	Lacking required cost/price analysis

Review Background and Process

1. Background

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

The Triennial Review includes a review of the recipient’s compliance in 21 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 Texoma Area Paratransit System, Inc. (TAPS). 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 award funds. The specific documents reviewed and referenced in this report are available at the FTA’s regional office or the recipient’s office.

2. Process

The Triennial Review process includes a pre-review assessment, a desk review and scoping meeting with the FTA regional office, and a virtual site visit. The review scoping meeting was conducted with the Region VI Office on February 18-20, 2020. Necessary files retained by the regional office were sent to the reviewer electronically. A recipient information request was sent to TAPS on October 30, 2019 indicating a review would be conducted during Fiscal Year 2020. In March 2020, all work on Reviews was halted due to the Public Health Emergency. A subsequent recipient information request was sent to TAPS on October 27, 2020 advising it that a virtual site visit would be taking place and indicating additional information that would be needed and issues that would be discussed. The desk review of the Supplemental Recipient Request for Information was completed on June 13, 2021. The virtual site visit to TAPS occurred on July 29, 2021.

The virtual site visit portion of the review began with an entrance conference, at which the purpose of the Triennial Review and the review process were discussed. The remaining time was spent discussing administrative and statutory requirements and reviewing documents. In addition, the reviewer evaluated how TAPS has used CARES Act and ER funding and the impacts of COVID-19 Public Health Emergency on the agency by discussing a series of questions included in the supplement to the FY 2020 Contractors' Manual. Additional documentation was requested for the Financial Management and Capacity and Procurement areas only. The reviewer examined a sample of maintenance records for FTA-funded vehicles and equipment.

Upon completion of the review, FTA and the reviewer provided a summary of preliminary findings to TAPS at an exit conference. Section VI of this report lists the individuals participating in the review.

3. Metrics

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

- *Not Deficient*: An area is considered not deficient if, during the review, nothing came to light that would indicate the requirements within the area reviewed were not met.
- *Deficient*: An area is considered deficient if any of the requirements within the area reviewed were not met.
- *Not Applicable*: An area can be deemed not applicable if, after an initial assessment, the recipient does not conduct activities for which the requirements of the respective area would be applicable.

Recipient Description

1. Organization

The Texoma Area Paratransit System (TAPS) is a political subdivision of the State of Texas, operating as TAPS Public Transit. TAPS is a private, non-profit corporation. TAPS originated as a van and a station wagon ride service in 1986, supported by 13 separate Senior Centers and communities in Fannin, Grayson, and Cooke Counties. Through an effort led by the Area Agency on Aging, TAPS was created to maximize resources to address regional transportation needs. The current Board of Directors consists of representatives from Clay, Cooke, Fannin, Grayson, Montague, and Wise counties; and the Cities of Bowham, Denison, and Sherman.

Prior to 2016, TAPS operated fixed-route, commuter, and paratransit service. Because of well documented financial and program management issues, TAPS ceased all service operations and laid off all but four employees in January 2016. Between January and March 2016, the Board of Directors worked on plans to reorganize the agency, which resulted in a contract with Transdev, Inc. that restored service on April 18, 2016.

TAPS currently provides demand-response service to the general public in Clay, Cooke, Fannin, Grayson, Montague, and Wise counties. Weekday demand-response transit service is provided from 6:00 a.m. to 6:00 p.m. There is no Saturday or Sunday service.

The basic adult fare for in-town demand-response service is \$2.00. Students, seniors aged 60 or older, persons with disabilities, and Medicare cardholders pay \$1.00. The fares for out-of-town trips are \$3.00 for adults and \$1.50 for students, seniors aged 60 or older, persons with disabilities, and Medicare cardholders. The fares for out-of-county trips are \$4.00 for adults and \$2.00 for students, seniors aged 60 or older, persons with disabilities, and Medicare cardholders.

TAPS utilizes 33 FTA-funded vehicles for its demand-response service. The fleet consists of accessible vans and cutaway buses. TAPS operates from an administrative, operations, and maintenance facility located on Texoma Parkway in Sherman. While no FTA funds were used to build the facility, FTA funds were used during the review period to remodel the facility. There are three satellite locations where buses pull out due to the large service area. One is in Bonham in Fannin County; one is in Gainesville in Cooke County; and the third is in Decatur in Wise County. None of the satellite locations have federal interest.

2. Award and Project Activity

Below is a list of TAPS' open awards at the time of the virtual site visit.

Award Number	Award Amount	Year Executed	Description
TX-2017-082-00	\$1,601,552	2017	FY 2016 and 2017 Section 5307 Sherman UZA Operating
TX-2018-076-00	\$1,129,687	2018	FY2018 Section 5307 Sherman UZA Operating
TX-2019-089-00	\$132,210	2019	FY2017 & FY2018 5339 Program Sherman UZA
TX-2020-009-00	\$1,201,541	2020	FY2019 Section 5307 Sherman UZA Operating
TX-2020-056-00	\$3,482,218	2020	TAPS FY 2020 Section 5307 CARES Act Operating/PM Assistance
TX-2020-058-00	\$48,985	2020	FY2019 TAPS/ Sherman TX Section 5339 Bus and Bus Facilities Replacement Vehicle Purchase

Projects Completed

At the time of the virtual site visit, TAPS completed the following noteworthy projects:

- Replaced 10 revenue vehicles using a TIGER award
- Procured a service truck

- Purchased two coolers, a fall arrest system, and an overhead door for the maintenance facility
- Installed new fencing around the maintenance facility
- Repaved the maintenance facility parking lot.

Ongoing Projects

TAPS is currently implementing the following noteworthy project:

- Installing a new restroom and renovating offices at the maintenance facility.

Future Projects

TAPS plans to pursue the following noteworthy project in the next three to five years:

- Build a new administrative building next to its maintenance facility.

Results of the Review

3. Legal

Basic Requirement: The recipient must promptly notify the FTA of legal matters, include clauses in its third party and subrecipient agreements, and additionally notify the U.S. DOT Office of Inspector General (OIG) of any instances relating to false claims under the False Claims Act or fraud. Recipients must comply with restrictions on lobbying requirements.

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

4. Financial Management and Capacity

Basic Requirement: The recipient must have financial policies and procedures; an organizational structure that defines, assigns, and delegates authority; and financial management systems in place to match, manage, and charge only allowable cost to the award. The recipient must conduct required single audits and provide financial oversight of subrecipients.

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

ECHO draws not properly approved (F2-3)

Per FTA Circular 5010.1E Award Management Requirements Chapter VI (2), a recipient's formal organization structure must clearly define, assign, and delegate appropriate authority for all duties. Responsibility for duties and functions must be segregated within the organization to ensure that adequate internal checks and balances exist.

The person approving TAPS' Electronic Clearing House Operation (ECHO) draws, and the person that was requesting the funds in the ECHO, were not the persons that were authorized to do so in the ECHO system. In the ECHO system, Ms. Shellie White, current General Manager and former Finance Director, is the Approving Official; and Mr. Josh Walker, former General Manager, is the Requestor. However, the documentation for the ECHO draws stated that Ms. White prepared the draws, Mr. Walker drew down the funds, and Ms. Pamela Howeth,

Board Treasurer, approved the draws. While this does demonstrate sound internal controls, it did not match the authorized Approving Official and Requestor in the ECHO system. While Ms. White did give Ms. Howeth the authority to approve ECHO draws on her behalf, since Ms. White is an employee of TAPS' contractor, Transdev, she did not have the authority to do so. The Board of Directors must determine who may approve ECHO draws and who may request the funds, based upon their internal controls.

Corrective Actions and Schedule: For the deficiency *ECHO draws not properly approved (F2-3)*, by December 30, 2021, TAPS must update the Approving Official and Requestor in the ECHO system, based upon an action or resolution approved by the Board of Directors. TAPS must also submit to the FTA regional office a process documenting that the authorized Approving Official approves each ECHO request, and that the funds are drawn down by the authorized Requestor.

5. Technical Capacity – Award Management

Basic Requirement: The recipient must report progress of projects in awards to the FTA timely.

Finding: During this Triennial Review of TAPS, no deficiencies were found with the FTA requirements for Technical Capacity – Award Management.

6. Technical Capacity – Program Management and Subrecipient Oversight

Basic Requirement: The recipient must follow the public involvement process for transportation plans; develop and submit a State Management/Program Management Plan to the FTA for approval; report in the Federal Funding Accountability and Transparency Act Subaward Reporting System (FSRS) on subawards; and ensure subrecipients comply with the terms of the award.

This section only applies to recipients that have subrecipients; therefore, the requirements are not applicable to the review of TAPS.

7. Technical Capacity – Project Management

Basic Requirement: The recipient must be able to implement FTA-funded projects in accordance with the award application, FTA Master Agreement, and all applicable laws and regulations, using sound management practices; and prepare force account plans.

Finding: During this Triennial Review of TAPS, no deficiencies were found with the FTA requirements for Technical Capacity – Project Management.

8. Transit Asset Management

Basic Requirement: Recipients must comply with 49 CFR Part 625 to ensure public transportation providers develop and implement transit asset management (TAM) plans.

Finding: During this Triennial Review of TAPS, no deficiencies were found with the FTA requirements for Transit Asset Management.

9. Satisfactory Continuing Control

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

Finding: During this Triennial Review of TAPS, no deficiencies were found with the FTA requirements for Satisfactory and Continuing Control.

10. Maintenance

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

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

11. Procurement

Basic Requirement: The non-Federal entity must use its own documented procurement procedures which reflect applicable State, local, and tribal laws and regulations, and conform to applicable Federal law and the standards identified in 2 CFR Part 200. State recipients can use the state's overall policies and procedures. When applied to Federal procurements, those policies and procedures must still be compliant with all Federal requirements as applied to non-state recipients. The flexibility afforded by 2 CFR Part 200 should not be misconstrued as absolving a state from Federal requirements. For example, FTA does not require each State DOT to have policies and procedures separate from the state education department.

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

Lacking required cost/price analysis (P10-2)

Per 2 CFR 200.323 (Uniform Guidance) and FTA Circular 4220.1F Chapter VI, recipients must conduct a cost or price analysis in conjunction with every procurement action that is in excess of its Simplified Acquisition Threshold in order to determine that contractors' costs are fair and reasonable. The cost or price analysis must be conducted prior to awarding the contract. A review of TAPS' rolling stock procurement, which was conducted off the State of Oklahoma contract, revealed that no cost or price analysis was completed for this vehicle purchase.

Corrective Actions and Schedule: For the deficiency *Lacking required cost/price analysis (P10-2)*, by February 28, 2022, TAPS must submit to the FTA regional office documentation that it has updated its procurement process to include performing an applicable cost or price analysis for procurements above its Simplified Acquisition Threshold. For its next applicable procurement, TAPS must submit to FTA documentation that the required analysis was implemented.

12. Disadvantaged Business Enterprise (DBE)

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

Finding: During this Triennial Review of TAPS, no deficiencies were found with the US DOT requirements for DBE.

13. Title VI

Basic Requirement: The recipient must ensure that no person shall, on the grounds of race, color, or national origin, be excluded from participating in, or be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal financial assistance without regard to whether specific projects or services are federally funded. The recipient must ensure that all transit services and related benefits are distributed in an equitable manner.

Finding: During this Triennial Review of TAPS, no deficiencies were found with the FTA requirements for Title VI.

14. Americans with Disabilities Act (ADA) – General

Basic Requirement: Titles II and III of the ADA of 1990 provide that no entity shall discriminate against an individual with a disability in connection with the provision of transportation service. The law sets forth specific requirements for vehicle and facility accessibility and the provision of service, including complementary paratransit service.

Finding: During this Triennial Review of TAPS, no deficiencies were found with the US DOT requirements for ADA – General.

15. ADA – Complementary Paratransit

Basic Requirement: Under 49 CFR 37.121(a), each public entity operating a fixed-route system shall provide paratransit or other special service to individuals with disabilities that is comparable to the level of service provided to individuals without disabilities who use the fixed-route system. “Comparability” is determined by 49 CFR 37.123-37.133. Requirements for complementary paratransit do not apply to commuter bus, commuter rail, or intercity rail systems.

Finding: During this Triennial Review of TAPS, no deficiencies were found with the US DOT requirements for ADA – Complementary Paratransit.

16. Equal Employment Opportunity

Basic Requirement: The recipient must ensure that no person in the United States shall on the grounds of race, color, religion, national origin, sex, age, or disability be excluded from participating in, or denied the benefits of, or be subject to discrimination in employment under any project, program, or activity receiving Federal financial assistance under the Federal transit laws. (Note: Equal Employment Opportunity Commission’s regulation only identifies/recognizes religion and not creed as one of the protected groups.)

Finding: During this Triennial Review of TAPS, no deficiencies were found with the FTA requirements for Equal Employment Opportunity.

17. School Bus

Basic Requirement: Recipients are prohibited from providing school bus service in competition with private school bus operators unless the service qualifies and is approved by the FTA

Administrator under an allowable exemption. Federally funded equipment or facilities cannot be used to provide exclusive school bus service.

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

18. Charter Bus

Basic Requirement: Recipients are prohibited from using FTA-funded equipment and facilities to provide charter service if a registered private charter operator expresses interest in providing the service. Recipients are allowed to operate community-based charter services pursuant to certain regulatory exceptions.

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

19. Drug Free Workplace Act

Basic Requirement: Recipients are required to maintain a drug free workplace for all award-related employees; report any convictions occurring in the workplace timely; and have an ongoing drug free awareness program.

Finding: During this Triennial Review of TAPS, no deficiencies were found with the FTA requirements for Drug Free Workplace Act.

20. Drug and Alcohol Program

Basic Requirement: Recipients receiving Section 5307, 5309, 5311, or 5339 funds that have safety-sensitive employees must have a drug and alcohol testing program in place for such employees.

Finding: During this Triennial Review of TAPS, no deficiencies were found with the FTA requirements for Drug and Alcohol Program.

21. Section 5307 Program Requirements

Basic Requirement: For fixed-route service supported with Section 5307 assistance, fares charged seniors, persons with disabilities, or an individual presenting a Medicare card during off peak hours will not be more than one half the peak hour fares.

Recipients are expected to have a written, locally developed process for soliciting and considering public comment before raising a fare or carrying out a major transportation service reduction.

Recipients 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 TAPS, no deficiencies were found with the FTA requirements for Section 5307 Program Requirements.

22. Section 5310 Program Requirements

Basic Requirement: Recipients must expend funds on eligible projects that meet the specific needs of seniors and individuals with disabilities. Projects selected for funding under the Section 5310 program must be included in a locally developed, coordinated public transit-human services transportation plan. Recipients must approve all leases of Section 5310-funded vehicles and ensure that leases include required terms and conditions. Either the recipient or subrecipient must hold title to the leased vehicles.

This section only applies to recipients that receive Section 5310 funds directly from FTA; therefore, the requirements are not applicable to the review of TAPS.

23. Section 5311 Program Requirements

Basic Requirement: Recipients must expend funds on eligible projects to support rural public transportation services and intercity bus transportation.

This section only applies to recipients that receive Section 5311 funds directly from FTA; therefore, the requirements are not applicable to the review of TAPS.

Summary of Findings

Review Area	Finding	Deficiency Code(s)	Corrective Action(s)	Response Due Date(s)	Date Closed
1. Legal	ND				
2. Financial Management and Capacity	D	F2-3: ECHO draws not properly approved	TAPS must update the Approving Official and Requestor in the ECHO system, based upon an action or resolution approved by the Board of Directors. TAPS must also submit to the FTA regional office a process documenting that the authorized Approving Official approves each ECHO request, and that the funds are drawn down by the authorized Requestor.	December 30, 2021	
3. Technical Capacity – Award Management	ND				
4. Technical Capacity – Program Management and Subrecipient Oversight	NA				

Review Area	Finding	Deficiency Code(s)	Corrective Action(s)	Response Due Date(s)	Date Closed
5. Technical Capacity – Project Management	ND				
6. Transit Asset Management	ND				
7. Satisfactory Continuing Control	ND				
8. Maintenance	ND				
9. Procurement	D	P10-2: Lacking required cost/price analysis	TAPS must submit to the FTA regional office documentation that it has updated its procurement process to include performing an applicable cost or price analysis for procurements above its Simplified Acquisition Threshold. For its next applicable procurement, TAPS must submit to FTA documentation that the required analysis was implemented.	February 28, 2022	
10. Disadvantaged Business Enterprise	ND				
11. Title VI	ND				
12. Americans with Disabilities Act (ADA) - General	ND				
13. ADA – Complementary Paratransit	ND				
14. Equal Employment Opportunity	ND				
15. School Bus	ND				
16. Charter Bus	ND				
17. Drug Free Workplace Act	ND				
18. Drug and Alcohol Program	ND				
19. Section 5307 Program Requirements	ND				

Review Area	Finding	Deficiency Code(s)	Corrective Action(s)	Response Due Date(s)	Date Closed
20. Section 5310 Program Requirements	NA				
21. Section 5311 Program Requirements	NA				

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

Attendees

Name	Title	Phone Number	E-mail Address
<i>Texoma Area Paratransit System, Inc.</i>			
Judge Bill Magers	Chair, Board of Directors	903-813-4228	bmagers@co.grayson.tx.us
Shellie White	General Manager	580-775-8736	shellie.white@transdev.com
Shellie Cherry	Human Resources/ Safety	903-357-4014	shellie.cherry@transdev.com
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<i>Texas Department of Transportation</i>			
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<i>Qi Tech, LLC</i>			
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Honorable Bill Magers

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Appendices

No appendices included in this report.