

FINAL REPORT

**FISCAL YEAR 2017
TRIENNIAL REVIEW**

of

**Kansas City, MO
Recipient ID: 7207**

Performed for:

**U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION
REGION 7**

Prepared By:

Milligan & Company, LLC

Scoping Meeting Date: February 9, 2017

Site Visit Date: May 17-18, 2017

Final Report Date: July 24, 2017

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I. Executive Summary

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

The Triennial Review focused on Kansas City's compliance in 17 areas. Compliance with the requirements in three areas (*Public Comment on Fare Increases and Major Service Reductions, Half Fare, and Security*) is only required of grantees that receive Section 5307 funds, of which Kansas City does not. In addition, Kansas City only operates rail service, therefore, the requirements of *Charter Bus* and *School Bus* are not applicable for this review. Deficiencies were found in the areas listed below.

Review Area	Deficiencies	
	Code	Description
3. Maintenance	88	Late vehicle preventive maintenance
	117	Facility/equipment maintenance program lacking or inadequate
	191	Inadequate oversight of contracted maintenance activities
6. Procurement	271	Lacking required cost/price analysis (closed)
7. Disadvantaged Business Enterprise (DBE)	327	DBE uniform reports not submitted semi-annually of FTA comments not addressed
8. Legal	116	Subgrantee, contractor, or subcontractor did not submit OMB Standard Form LLL/quarterly update (closed)
9. Satisfactory Continuing Control	58	Inadequate equipment records
	196	Lacking rail fleet management plan/plan out of date
10. Planning/ Program of Projects (POP)	480	No current agreement or deficiencies in agreement with metropolitan planning organization (MPO) (closed)
16. Drug-Free Workplace/ Drug and Alcohol Program (D&A)	157	Drug and alcohol contractors, subrecipients, and/or lessees not properly monitored for D&A program
	298	Management Information System (MIS) reports not properly submitted
	311	No written Drug-Free Workplace Act (DFWA) policy

Subsequent to the site visit, Kansas City provided responses to address the corrective actions related to the deficiencies in the Procurement, *lacking required cost/price analysis (271)*, Legal, *subgrantee, contractor or subcontractor did not submit OMB Standard Form LLL/quarterly update (116)*, and Planning/POP, *no current agreement or deficiencies in agreement with MPO (480)*. This resulted in closing the deficiencies as detailed in the following report.

II. Review Background and Process

1. Background

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

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 Kansas 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 and referenced in this report are available at FTA’s regional office or 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 scoping meeting was conducted with the Region 7 Office on February 9, 2017. Necessary files retained by the regional office were sent to the reviewer electronically. A grantee information request and review package was sent to Kansas City advising it of the site visit and indicating information that would be needed and issues that would be discussed. The site visit to Kansas City occurred on May 17-18, 2017.

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. The reviewers visited Kansas City’s transit and maintenance facilities to provide an overview of activities related to FTA-funded projects.

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 Kansas City 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 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

1. Organization

Kansas City, Missouri received FTA grant funds for the construction of a 2.2 route-mile streetcar system in downtown Kansas City. The Kansas City Streetcar Authority (KCSA) is a not-for-profit organization formed for the purpose of managing, operating, and maintaining the streetcar and is part of a three-party agreement that includes Kansas City, KCSA, and the Downtown Streetcar Transportation Development District (TDD).

KCSA utilizes the services of an operating contractor, Herzog Transit Services, Inc. (HTSI) under a three-party agreement with Kansas City, KCSA, and HTSI.

Americans with Disabilities Act (ADA) complementary paratransit service is provided by the Kansas City Area Transportation Authority (KCATA), also an FTA grantee, under a three-party agreement between Kansas City, KCSA, and KCATA. The operation of the streetcar system is locally funded.

2. Services

The streetcar connects downtown neighborhoods with 16 stops. Streetcars operate every 10 to 15 minutes during peak periods and are fare free. Service is operated Monday – Thursday 6:00 am to 12:00 am; Friday 6:00 am to 2:00 am; Saturday 7:00 am to 2:00 am; and Sunday 7:00 am to 11:00 pm. Ridership reached two million passengers since the opening of passenger service May 6, 2016 through May 5, 2017.

Kansas City's National Transit Database (NTD) Report for fiscal year 2016 was a *Builder Report* with the first year of financial and operating statistics for its fixed-route service to be provided by October 2017. Since the system was under construction in both 2015 and 2016, Kansas City submitted only Builder Reports for those fiscal years. Operational service began May 2016. The first operational financial report is due to NTD in October, 2017.

3. Grant and Project Activity

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

Grant Number	Grant Amount	Year Executed	Description
MO-79-0003	\$20,000,000	2014	FTA Transportation Investment Generating Economic Recovery (TIGER) Discretionary Funds 2013
MO-95-X260	\$9,130,200	2014	FHWA/FTA Transfer Surface Transportation Program (STP) Funds 2013 and Congestion Mitigation and Air Quality Improvement (CMAQ) Funds 2013
MO-95-X260	\$8,000,000	2015	FHWA/FTA Transfer STP Funds 2014 (grant amendment)

Noteworthy Projects

During the review period, Kansas City completed construction and began operation of the 2.2-mile streetcar system. Kansas City is currently in the process of studying the possible expansion of the system.

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 Kansas City, no deficiencies were found with the FTA requirements for Financial Management and Capacity.

2. Technical Capacity

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

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

3. Maintenance

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

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

Late vehicle preventive maintenance (88)

FTA Circular 5010.1D, Ch. II, Section 3.a requires recipients to demonstrate procedures for asset management and adequate maintenance of equipment and facilities. Kansas City performs preventive maintenance and inspections for its fleet of four cars on a 15-day schedule. Preventive maintenance and inspections were not performed on 28 of 101 scheduled instances over the prior 12 months. Twenty-two of the non-performance instances were impacted by the streetcar manufacturer taking the vehicle out of service for vehicle system updates.

Facility/equipment maintenance program lacking or inadequate (117)

FTA Circular 5010.1D, Ch IV, Section K.7 states “Adequate maintenance procedures must be developed and implemented to keep the project property in good condition.” Kansas City’s facility and equipment maintenance plan does not include all FTA-funded equipment, such as the shop air compressor.

Inadequate oversight of contracted maintenance activities (191)

FTA Circular 5010.1D, Ch IV, Section M states “*The grantee agrees to maintain project property in good operating order and in compliance with any applicable Federal regulations or directives that may be issued, except to the extent that FTA determines otherwise in writing. The grantee agrees to keep satisfactory records pertaining to the use of project property, and to submit to FTA upon request such information as may be required to assure compliance with Federal requirements. The grantee is required to have a written vehicle maintenance plan and facility/equipment maintenance plan. These plans should describe a system of periodic inspections and preventive maintenance to be performed at certain defined intervals.*” Kansas City’s monitoring plan requires the contractor to provide maintenance reports in a software package. The contractor has not loaded the maintenance data into the software package. Kansas City was unable to provide any documentation of monitoring the maintenance performed by the contractor through the maintenance software or otherwise.

Corrective Actions and Schedule:

For the deficiency, *late vehicle preventive maintenance (88)*, by October 19, 2017, perform the following:

- Submit to the FTA regional office procedures for completing preventive maintenance inspections on time.
- Submit to the FTA regional office a monthly report signed by the chief executive officer or other senior management designee, on Kansas City’s preventive maintenance results, until the data demonstrate it has conducted at least 80 percent of its preventive maintenance on time for three consecutive months. For each vehicle that received a preventive maintenance inspection during the month, include with the submittal to the FTA regional office, a report that lists the vehicle number, date of the inspection, date of the previous inspection, and the time interval between the two inspections. List the percentage of the inspections performed on time.
- Submit to the FTA regional office back-up documentation for each vehicle (e.g., copy of work order, printout from the maintenance management system) documenting the date and mileage of the inspection.

For the deficiency, *facility/equipment maintenance program lacking or inadequate (117)*, by October 19, 2017, submit to the FTA regional office a revised facility/equipment maintenance program that includes all FTA-funded components and documentation of implementation.

For the deficiency, *inadequate oversight of contracted maintenance activities (191)*, by October 19, 2017, submit to the FTA regional office a maintenance oversight program, along with evidence of its implementation.

4. Americans with Disabilities Act

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 Kansas City, no deficiencies were found with the U.S. Department of Transportation (US DOT) requirements for ADA.

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.

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

6. Procurement

Basic Requirement: Grantees use their own procurement procedures that reflect applicable state and local laws and regulations, if the process ensures competitive procurement and the procedures conform to applicable Federal law, including 49 CFR Part 18, (repealed effective December 26, 2014), 2 CFR Part 1201, incorporating 2 CFR Part 200 (specifically Sections 200.317-200.326), and FTA Circular 4220.1F, "Third Party Contracting Guidance."

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

Lacking required cost/price analysis (271)

FTA Circular 4220.1F states "*Each recipient must evaluate and state its justification for the contract cost or price.*" The two contracts reviewed during the site visit were for the system construction (\$85,376,439) and vehicle acquisition (\$16,928,046). Neither of the contract files reviewed contained documentation that the required cost or price analyses were performed.

Subsequent to the site visit, Kansas City submitted to the FTA regional office documentation that Kansas City has updated its procurement process to include performing cost and price analyses for procurement actions that meet the Simplified Acquisition Threshold. Based on the submission of the corrective action, this deficiency is closed.

7. Disadvantaged Business Enterprise

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

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

DBE uniform reports not submitted semi-annually or FTA comments not addressed (327)
49 CFR 26.11 states “You must transmit the Uniform Report of DBE Awards or Commitments and Payments, found in Appendix B to this part, at the intervals stated on the form.

Kansas City prepared and uploaded a hard copy (instead of inputting the required information in the module) of the *Uniform Report of DBE Awards or Commitments and Payments* in the FTA’s electronic grants management system for fiscal years 2014 and 2015. In addition, reports due June 1 and December 1, 2014 were submitted late and the reports due June 1 and December 1, 2016 were not submitted.

Corrective Action and Schedule:

For the deficiency, *DBE uniform reports not submitted semi-annually or FTA comments not addressed (327)*, by October 19, 2017, perform the following;

- Submit the semi-annual Uniform Report of DBE Awards or Commitments and Payments (due June 1 and December 1) in TrAMS for fiscal year 2016.
- Submit to the FTA regional civil rights officer (RCRO) an implemented procedure to ensure that future reports are submitted on time and completed in the DBE module of the FTA’s electronic grants 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. Grantees must comply with Restrictions on Lobbying requirements.

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

Subgrantee, contractor or subcontractor did not submit OMB Standard Form LLL/quarterly update (116)

49 CFR Part 20 requires a grantee to obtain an OMB Standard Form LLL or a quarterly report update from a subrecipient, contractor, or subcontractor for an event that should have been reported.

Kansas City does not have a documented process to obtain the OMB Standard Form LLL or a quarterly report update from a contractor or subcontractor for an event that should have been reported and is unable to assess whether any lobbying activities have been done.

Subsequent to the site visit, Kansas City submitted to the FTA regional office the required OMB Standard Form LLL/quarterly update for 2015 to date. Kansas City also developed and submitted to the FTA regional office a process to ensure the timely reporting of OMB Standard Form LLL/quarterly update by contractors or subcontractors in the future. Based on the submission of the corrective actions, this deficiency is closed.

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 Kansas City, deficiencies were found with the FTA requirements for Satisfactory Continuing Control.

Inadequate equipment records (58)

FTA circular 5010.1D Ch IV K-3 states, "Equipment records must be maintained by the grantee. Records must include:

- | | |
|-------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|
| (a) a description of the asset | (h) use and condition |
| (b) identification number | (i) useful life |
| (c) source of property (the grant project number under which it was procured) | (j) any disposition data, including the date of disposal and sale price, or, where applicable, method used to determine its fair market value |
| (d) acquisition date | (k) who holds title to the equipment, including rolling stock." |
| (e) cost | |
| (f) percentage of Federal participation in the cost | |
| (g) location | |

Kansas City's equipment records do not contain required elements such as acquisition date, useful life or use and condition.

Lacking rail fleet management plan/plan out of date (196)

FTA Circular 5010.1D states "An operator of a rail system must have in its file available upon request by FTA a rail fleet management plan that addresses operating policies (level of service requirements, train failure definitions, and actions); peak vehicle requirements (service period and make-up, e.g., standby trains); maintenance and overhaul program (schedules, unscheduled, and overhaul); system and service expansions; rail car procurements and related schedules; and spare ratio justification."

Kansas City's rail fleet management plan does not include all required elements such as system and service expansion.

Corrective Actions and Schedule:

For the deficiency, *inadequate equipment records (58)*, by October 19, 2017, submit to the FTA regional office updated records that include all required elements including acquisition date, useful life, and use and condition.

For the deficiency, *lacking rail fleet management plan/plan out of date (196)*, by October 19, 2017, submit to the FTA regional office a revised or updated rail fleet management plan that includes system and service expansions.

10. Planning/Program of Projects

Basic Requirement: The grantee must participate in the transportation planning process in accordance with FTA requirements, Fixing America's Surface Transportation (FAST) Act, 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 Kansas City, a deficiency was found with the FTA requirements for Planning/POP.

No current agreement or deficiencies in agreement with MPO (480)

FTA C 9030.1E requires grantees to have an agreement with the MPO. Kansas City does not have a current agreement with the MPO that addresses its responsibilities, the development and sharing of information for financial plans, or the development of the annual listing of obligated projects.

Subsequent to the site visit, Kansas City submitted to the FTA regional office a schedule for providing a fully executed agreement that specifies the cooperative procedures for carrying out transportation planning and programming and addresses at least Kansas City's responsibilities for the development and sharing of information for financial plans, and the development of the annual listing of obligated projects. Based on the submission of the corrective action, this deficiency is closed.

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: The FTA requirements for Public Comment on Fare Increases and Major Service Reductions only apply to grantees that receive Section 5307 funds; therefore, this section is not applicable to the review of Kansas City.

12. Half Fare

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.

Finding: The FTA requirements for Half Fare only apply to grantees that receive Section 5307 funds; therefore, this section is not applicable to the review of Kansas City.

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: Kansas City only operates rail service; therefore, the requirements of Charter Bus are not applicable for this review.

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: Kansas City only operates rail service; therefore, the requirements of School Bus are not applicable for this review.

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: The FTA requirements for Security only apply to grantees that receive Section 5307 funds; therefore, this section is not applicable to the review of Kansas City.

16. Drug Free Workplace and Drug and Alcohol Program

Basic Requirement: Grantees are required to maintain a drug-free workplace for all grant-related employees and to have an ongoing drug-free awareness program. Grantees 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 Kansas City, deficiencies were found with the FTA requirements for Drug-Free Workplace and Drug and Alcohol Program.

Drug and alcohol contractors, subrecipients, and/or lessees not properly monitored for D&A program (157)

Grantees are responsible for overseeing the drug and alcohol programs of subrecipients, contractors, subcontractors, and lessees with safety-sensitive employees. The oversight program must ensure that all aspects of the drug and alcohol programs are in compliance with 49 CFR Part 655, Prevention of Alcohol Misuse and Prohibited Drug Use in Transit Operations, as amended, and 49 CFR Part 40, Procedures for Transportation Workplace Drug and Alcohol Testing Programs, as amended.

Kansas City does not have documentation of monitoring of HTSI, its operations and maintenance contractor for compliance with FTA's drug and alcohol requirements.

MIS reports not properly submitted (298)

49 CFR §655.72 requires reporting of drug and alcohol testing results through the MIS. "Each recipient shall be responsible for ensuring the accuracy and timeliness of each report submitted by an employer, contractor, consortium or joint enterprise or by a third-party service provider acting on the recipient's or employer's behalf."

Kansas City has not ensured submission of, or submitted MIS reports for its contractor, HTSI.

No written DFWA policy (311)

49 CFR 32.200 through 230 requires grant recipients to publish a drug-free workplace statement and establish a drug-free awareness program for grant related employees. The program requires a published statement that:

- a) Tells your employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in your workplace;
- b) Specifies the actions that you will take against employees for violating that prohibition;
- c) Let's each employee know that, as a condition of employment under any award, he or she:
 1. Will abide by the terms of the statement; and
 2. Must notify you in writing if he or she is convicted for a violation of a criminal drug statute occurring in the workplace and must do so no more than five calendar days after the conviction.

Kansas City's Drug and Alcohol Misuse Testing policy does not specifically mention the Drug-Free Workplace Act and does not include the requirement to report a conviction for a violation of a criminal drug statute occurring in the workplace within five calendar days after the conviction.

Corrective Actions and Schedule:

For the deficiency, *drug and alcohol contractors, subrecipients, and/or lessees not properly monitored for D&A program (157)*, by October 19, 2017, submit to the FTA regional office a drug and alcohol oversight plan for HTSI.

For the deficiency, *MIS reports not properly submitted (298)*, by October 19, 2017, perform the following:

- o Prepare or collect and submit all delinquent MIS forms in the Drug and Alcohol MIS.
- o Develop and submit to the FTA regional office a procedure for timely reporting of MIS forms, along with documentation of its implementation and copies of the MIS reports.

For the deficiency, *no written DFWA policy (311)*, by October 19, 2017, submit to the FTA regional office a written or amended DFWA policy that includes all required elements, along with documentation that it has been distributed to all grant-related employees.

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: 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 Kansas City, no deficiencies were found with the FTA requirements for EEO.

V. Summary of Findings

Review Area	Finding	Deficiency	Corrective Action	Response Due Date	Date Closed
1. Financial Management and Capacity	ND				
2. Technical Capacity	ND				
3. Maintenance	D	88: Late vehicle preventive maintenance	Submit to the FTA regional office procedures for completing preventive maintenance inspections on time.	October 19, 2017	
			Submit to the FTA regional office a monthly report signed by the chief executive officer or other senior management designee, on Kansas City's preventive maintenance results, until the data demonstrate it has conducted at least 80 percent of its preventive maintenance on time for three consecutive months. For each vehicle that received a preventive maintenance inspection during the month, include with the submittal to the FTA regional office, a report that lists the vehicle number, date of the inspection, date of the previous inspection, and the time interval between the two inspections. List the percentage of the inspections performed on time.	October 19, 2017	
			Submit to the FTA regional office back-up documentation for each vehicle (e.g., copy of work order, printout from the maintenance management system) documenting the date and mileage of the inspection.	October 19, 2017	
		117: Facility/equipment maintenance program lacking or inadequate	Submit to the FTA regional office a revised facility/equipment maintenance program and documentation of implementation.	October 19, 2017	

Review Area	Finding	Deficiency	Corrective Action	Response Due Date	Date Closed
		191: Inadequate oversight of contracted maintenance activities	Submit to the FTA regional office a maintenance oversight program, along with evidence of its implementation.	October 19, 2017	
4. ADA	ND				
5. Title VI	ND				
6. Procurement	D	271: Lacking required cost/price analysis	Provide the FTA regional office documentation that it has updated its procurement process to include performing cost and price analyses for every procurement action.	October 19, 2017	July 6, 2017
7. DBE	D	327: DBE uniform reports not submitted semi-annually	Submit the semi-annual Uniform Report of DBE Awards or Commitments and Payments (due June 1 and December 1) in the EAMS for fiscal year 2016.	October 19, 2017	
			Submit to the FTA RCRO an implemented procedure to ensure that future reports are submitted on time and completed in the DBE module of the FTA's electronic grants management system.	October 19, 2017	
8. Legal	D	116: Contractor, or subcontractor did not submit OMB Standard Form LLL/quarterly update	Submit to the FTA regional office the required OMB Standard Form LLL/quarterly update for 2015 to date.	October 19, 2017	July 6, 2017
			Develop and submit to the FTA regional office a process to ensure the future timely reporting of OMB Standard Form LLL/quarterly update by contractors or subcontractors.	October 19, 2017	July 6, 2017
9. Satisfactory Continuing Control	D	58: Inadequate equipment records	Submit to the FTA regional office updated records that include acquisition date, useful life and use and condition	October 19, 2017	
		196: Lacking rail fleet management plan	Submit to the FTA regional office a revised or updated rail fleet management plan that includes system and service expansions.	October 19, 2017	

Review Area	Finding	Deficiency	Corrective Action	Response Due Date	Date Closed
10. Planning/ POP	D	480: No current agreement or deficiencies in agreement with MPO	Provide the FTA regional office with a schedule for providing a fully executed agreement that specifies the cooperative procedures for carrying out transportation planning and programming and addresses at least the grantee's responsibilities for the development and sharing of information for financial plans, and the development of the annual listing of obligated projects.	October 19, 2017	July 6, 2017
11. Public Comment on Fare Increases and Major Service Reductions	NA	The requirements of this section only apply to grantees that receive Section 5307 funds; therefore, this section is not applicable to the review of Kansas City.			
12. Half Fare	NA	The requirements of this section only apply to grantees that receive Section 5307 funds; therefore, this section is not applicable to the review of Kansas City.			
13. Charter Bus	ND	Kansas City only operates rail service; therefore, the requirements of Charter Bus are not applicable for this review.			
14. School Bus	ND	Kansas City only operates rail service; therefore, the requirements of School Bus are not applicable for this review.			
15. Security	NA	The requirements of this section only apply to grantees that receive Section 5307 funds; therefore, this section is not applicable to the review of Kansas City.			
16. Drug-Free Workplace/ Drug and Alcohol Program	D	157: Drug and Alcohol contractors not properly monitored for D&A program	Submit to the FTA regional office a drug and alcohol oversight plan for HTSI.	October 19, 2017	
		298: MIS reports not properly submitted	Prepare or collect and submit all delinquent MIS forms in DAMIS.	October 19, 2017	
			Develop and submit to the FTA regional office a procedure for timely reporting of MIS forms, along with documentation of its implementation and copies of the MIS reports.	October 19, 2017	
		311: No written DFWA policy	Submit to the FTA regional office a written or amended DFWA policy that includes all required elements along with documentation that it has been distributed to all grant-related employees.	October 19, 2017	
17. EEO	ND				

VI. Attendees

Name	Title	Phone Number	E-mail Address
<i>Kansas City, MO</i>			
Sherri McIntyre	Public Works Director/Assistant City Manager	816-513-2634	sherri.mcintyre@kcmo.org
Patty Hilderbrand	Public Works Division Mgr, Coordination Services	816-513-2576	Patty.hilderbrand@kcmo.org
Darrell Everette	Procurement Manager – Construction	816-513-0798	Darrell.everette@kcmo.org
Cedric Rowan	Manager of Procurement Services	816-513-0814	Cedric.rowan@kcmo.org
Tom Gerend	Executive Director- KC Streetcar Authority	816-627-2525	trerend@kcstreetcar.org
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VII. Appendices

No appendices included in this report.