

**FEDERAL TRANSIT ADMINISTRATION  
COMPLIANCE REVIEW  
FIRST TRANSIT — ROSEVILLE, 2019**  
*PROGRAM EVALUATION AND AUDIT*

DRAFT



**METROPOLITAN  
C O U N C I L**

February 5, 2020

## Introduction

### Background

First Transit - Roseville contracts with the Metropolitan Council to operate Metro Mobility service in the East Metro Zone. Metro Mobility is a “dial-a-ride,” door-to-door service for people with disabilities who cannot access standard transportation. The East Metro Zone covers Minneapolis and the communities to its east, spanning from Maple Grove to Eden Prairie. The Roseville garage operates about 170 vehicles under the terms of Contract 14P109.

### Purpose

As a direct recipient of federal funds from the Federal Transit Administration (FTA), the Metropolitan Council is required to conduct oversight of its subrecipients and ensure that they comply with federal requirements. Program Evaluation and Audit reviews subrecipients on a triennial basis to help fulfill the Council’s obligations as a direct recipient.

### Objective

The objective of the Audit is to determine First Transit Roseville’s compliance with federal requirements in six (6) areas, as well as for compliance with the service agreement’s contractual requirements.

### Scope

This review covers activities conducted during the last three years under Council Contract 14P109. It also covers any services or activities that used FTA or Metropolitan Council funded vehicles subject to the Master Lease Agreement.

### Methodology

Audit conducted its review from September 2019 through December 2019. Audit conducted a desk review of First Transit Roseville’s policies, procedures, and practices for compliance using the FTA’s *Comprehensive Review Guide for Triennial and State Management Reviews Fiscal Year 2019*, Council Contract 14P127, and the Master Lease Agreement as criteria. Once the desk review was complete, an onsite interview was held with First Transit’s management. Audit also performed a maintenance review of a sample of vehicles.

Prior to this report’s issuance, Audit met with Metropolitan Transportation Services (MTS) and Office of Equal Opportunity (OEO) staff to discuss the findings. Audit also held an exit conference with First Transit Roseville prior to the presentation to Audit Committee.

Audit did not review First Transit Roseville’s Drug and Alcohol program. In September of 2019, the FTA conducted its own review of Roseville’s program. After examining the scope and results of this review, Audit concluded that an additional review would be redundant. Therefore, Audit defers the Drug and Alcohol portion of Roseville’s triennial audit to the findings and follow-up requirements detailed in the FTA report.

## Findings and Responses

### 1. Americans with Disabilities Act (ADA)

**Basic Requirement:** Recipients must track, resolve, and respond to ADA-related complaints and advertise this process to the public in an easily accessible format for individuals with disabilities.

During this Triennial Review of First Transit Roseville, no deficiencies were found with the FTA requirements for Americans with Disabilities.

### 2. Equal Employment Opportunity (EEO)

**Basic Requirement:** Recipients are required to submit a full or abbreviated EEO Program based on the number of its transit-related employees and whether it reaches a monetary threshold.

During this Triennial Review of First Transit Roseville, no deficiencies were found with the FTA requirements for Equal Employment Opportunity.

### 3. Legal

**Basic Requirement:** Recipients must promptly notify the FTA of any current or prospective legal matters that may affect the Federal government.

During this review of First Transit Roseville, no deficiencies were found with the FTA requirements for Legal.

### 4. Maintenance

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

During this Triennial Review of First Transit Roseville, no deficiencies were found with the FTA requirements for Maintenance.

### 5. Satisfactory Continuing Control

**Basic Requirement:** Recipients must maintain adequate property records and submit annual reports on the status of real property in which the Federal Government retains interest.

During this review of First Transit Roseville, no deficiencies were found with the FTA requirements for Satisfactory Continuing Control.

## 6. Title VI

Basic Requirement: Recipients are required to have a Title VI plan. Contractors are required to implement the Title VI programs of the agencies that they contract with. Contractors are required to conduct their services without regard to race, color, or national origin.

During this Triennial Review of First Transit Roseville, no deficiencies were found for FTA requirements for Title VI.

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