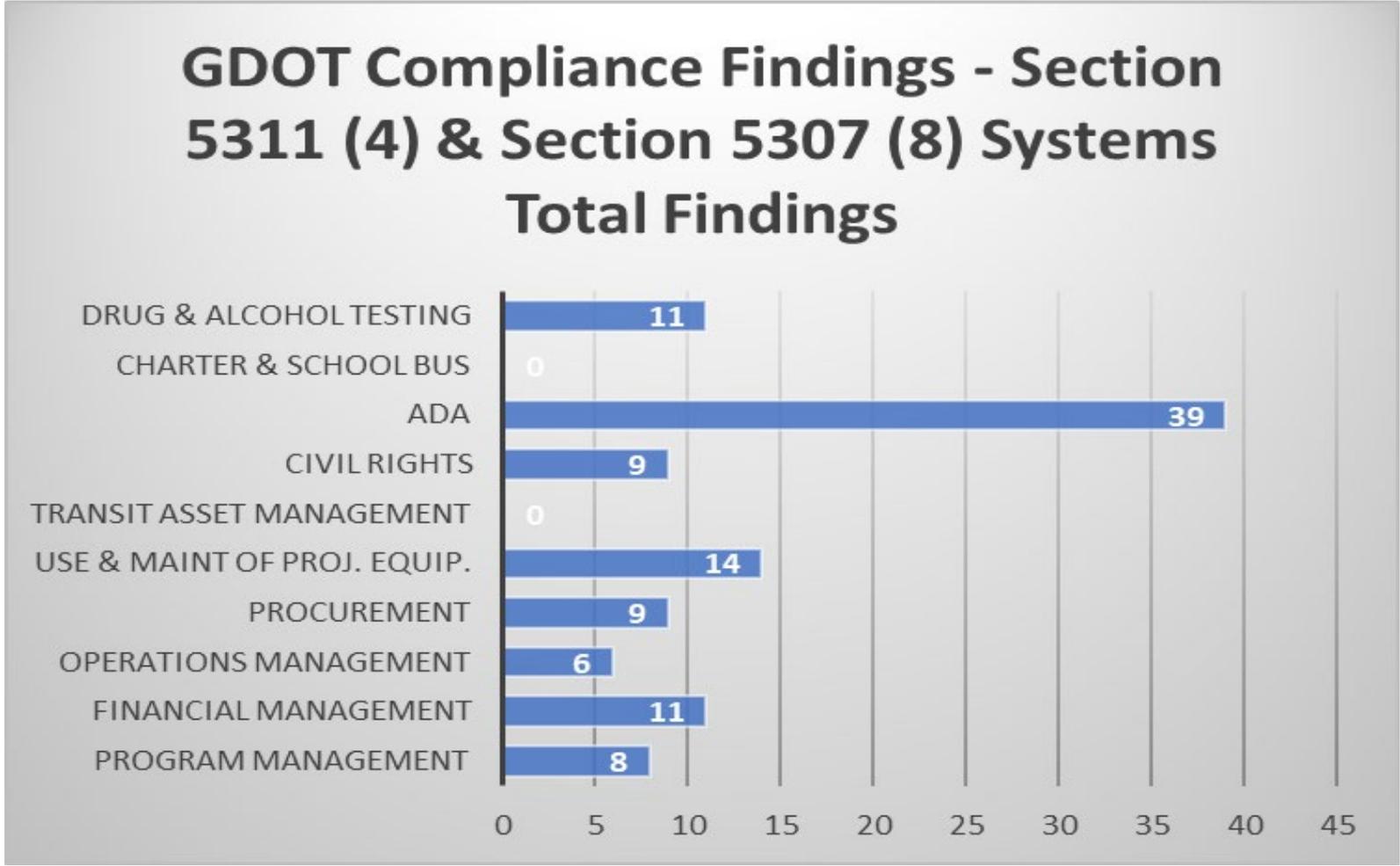


Common 2021 GDOT Compliance Findings – Section 5311 & Section 5307 Reviews



Common 2021 GDOT Compliance Findings

Program Management

- Late GDOT quarterly reports (3)
- Lacked basic service information on website (3)
- KPI reports not submitted to GDOT (2)

Corrective Actions: Submittal of reports on-time, add basic service type, hours, days, etc. to website

Note: As your transit system service changes, keep a checklist on all public information materials that need to be revised (i.e., website, system brochure, flyers, etc.) and consider changes in compliance requirements.

Common 2021 GDOT Compliance Findings

Financial Management

- Lacked or had insufficient grants management procedures (4)
- Lacked sufficient cash management procedures (3)
- No service agreement for contract service to local agency or contract expired (3)

Corrective Actions: Develop detailed cash management procedures to ensure two individuals present when counting fares/donations, ensure contract service agreements are executed prior to initiation of service, and develop detailed grants management procedures to include actions to “determine eligible and allowable costs”.

Tip: For service contracts, always begin the process at least two months prior to new contract to provide sufficient time for governing board approval, if necessary.

Common 2021 GDOT Compliance Findings

Operations Management

- ADA definition of trip denials not used (4)

Corrective Actions: Revise ADA policies for more specific trip denial definition details:

- A rider requests a next-day trip, and the transit agency says it cannot provide that trip.
- A rider requests a next-day trip, and the transit agency can only offer a trip that is outside of the 1 hour negotiating window. *This represents a denial regardless of whether the rider accepts such an offer.*
- A rider requests a round-trip and the agency can only provide one leg of the trip. If the rider does not take the offered one-way trip, both portions of the trip are denials.

Common 2021 GDOT Compliance Findings

Procurement

- Procurement Policy did not include all federal requirements (6)
 - Examples of common issues: -No
 - Bid protest procedures
 - Documenting sam.gov debarment/suspension checks
 - OMB changes to thresholds on micro-purchase (<\$10,000), small (>\$3,000 to \$250,000), and formal (>\$250,000) purchase thresholds
 - Did not consistently complete independent cost estimates

Corrective Actions: Revise Procurement Policy using GDOT's compliant template that was recently updated. Customization will likely be required depending on the subrecipient's purchase thresholds (but must at least be =/< GDOT/Federal requirements).

Common 2021 GDOT Compliance Findings

Use and Maintenance of Project Equipment and Facilities

- Did not meet 80% on-time performance with vehicle PM intervals (7)
- Lacked facility maintenance plan for federally-funded shelters (4)

Corrective Actions: Improve staff (management/operations) monitoring PM interval performance and including the FTA 80% on-time performance (+/- 10% of the target interval mileage in the vehicle maintenance plan and training all staff of the goal).

Development of Facilities Maintenance Plan that includes Federally-funded passenger bus stop shelters and amenities.

Common 2021 GDOT Compliance Findings

Americans With Disabilities Act

- Does not sufficiently advertise information regarding how riders can request reasonable modifications in policies, practices, or procedures (8)
- Does not sufficiently advertise to the public the process for filing an ADA-related complaint (7)
- Does not sufficiently advertise the availability of information in accessible formats (6)
- No-show policy - unreasonable numerical threshold for suspension (5)
- Service animal definition not consistent with FTA requirements (4) – stated only dogs

Corrective Actions: Revise ADA policies and procedures using Best Practice samples and training staff on requirements. **Best Resource For More Information On No-Show/Suspensions:** Topic Guides on ADA Transportation <https://dredf.org/ADAtg/>

Common Drug & Alcohol Findings

- Drug & Alcohol Policy
- Random Testing Spread
- Service Agent Oversight – Review of CCFs/ATFs

Common Drug & Alcohol Findings

Drug & Alcohol Policy

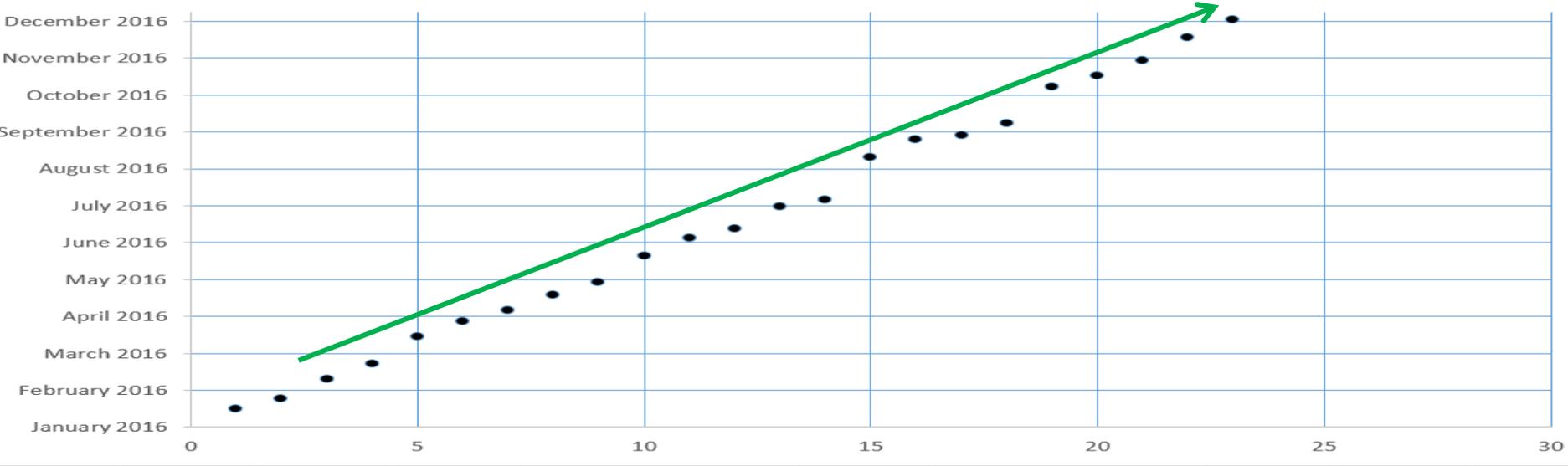
- Needs updates
 - Your policy will ALWAYS be a **LIVING** document
 - Seek expert review on regular basis (FTA or GDOT)
 - [FTA policy builder website](#)
 - GDOT Template (updated in April 2021)
- USDOT-FTA Provisions vs. Employer Specific Provisions
- Governing authority must re-approve EVERY TIME POLICY IS REVISED

Common Drug & Alcohol Findings

Random Testing Spread

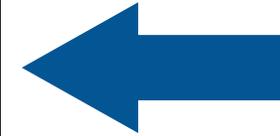
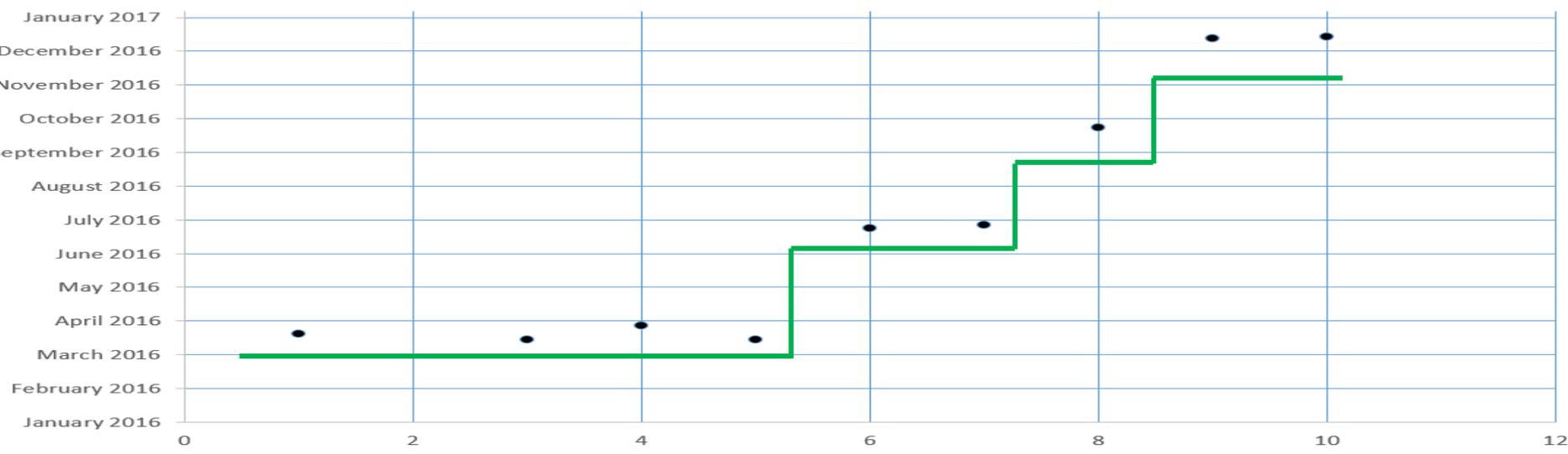
- Your random tests are **REQUIRED** to be spread throughout the year during ALL days/times safety-sensitive functions are performed
- Testing **MUST NOT** be patterned or predictable
- **#1 Purpose = Deterrence and Detection!!!!**

ACME TRANSIT - Random Testing Throughout The Year



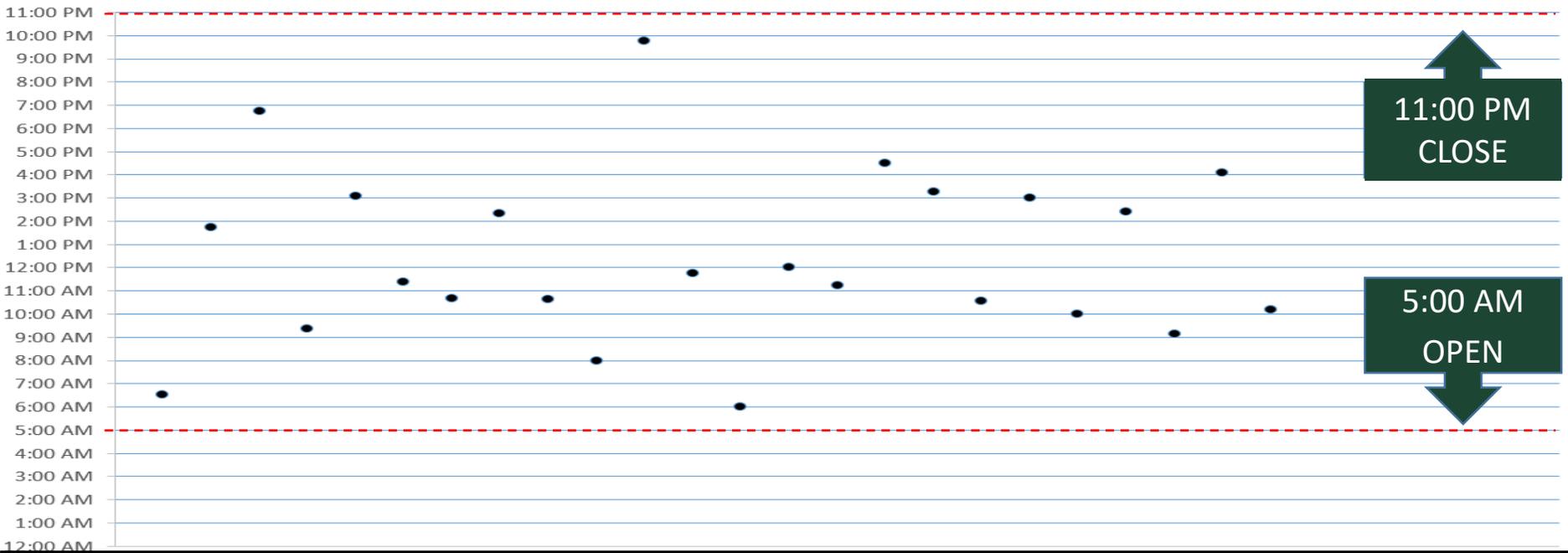
GOOD!

SUNRAY TRANSIT - Random Testing Throughout The Year



**Predictable
w/ Gaps**

ACME TRANSIT - Random Testing Throughout The Day



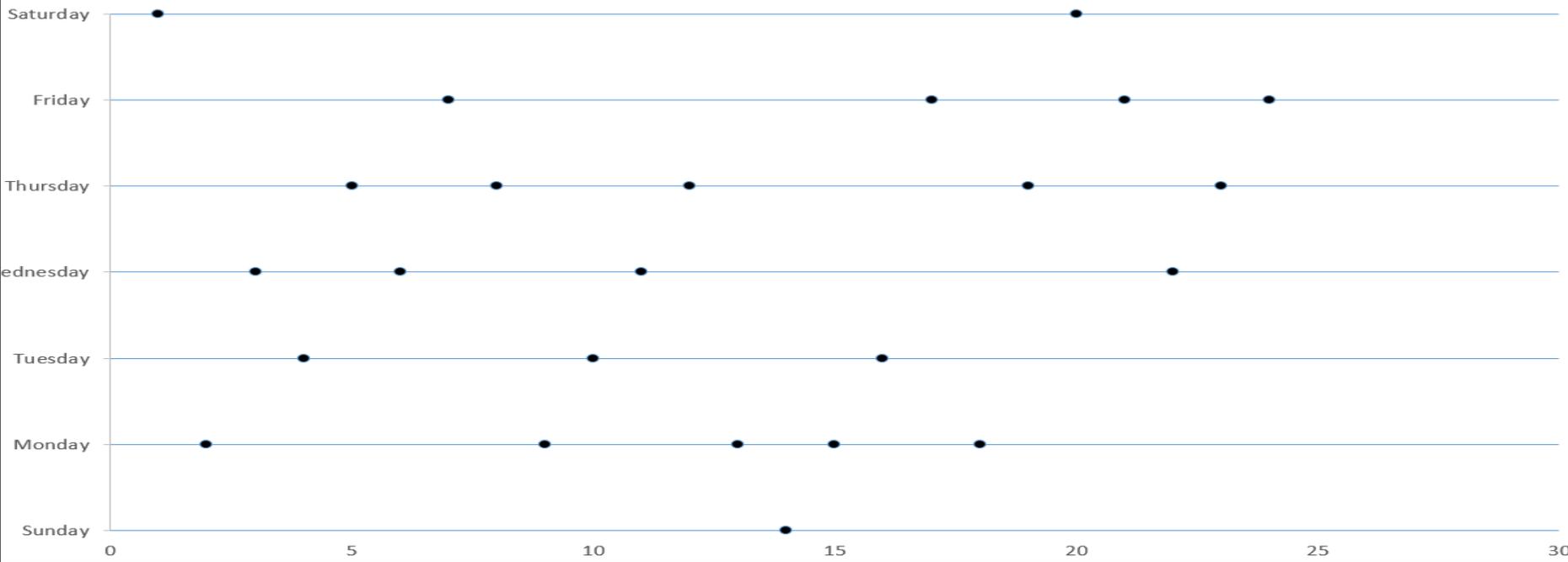
GOOD!

SUNRAY TRANSIT - Random Testing Throughout The Day



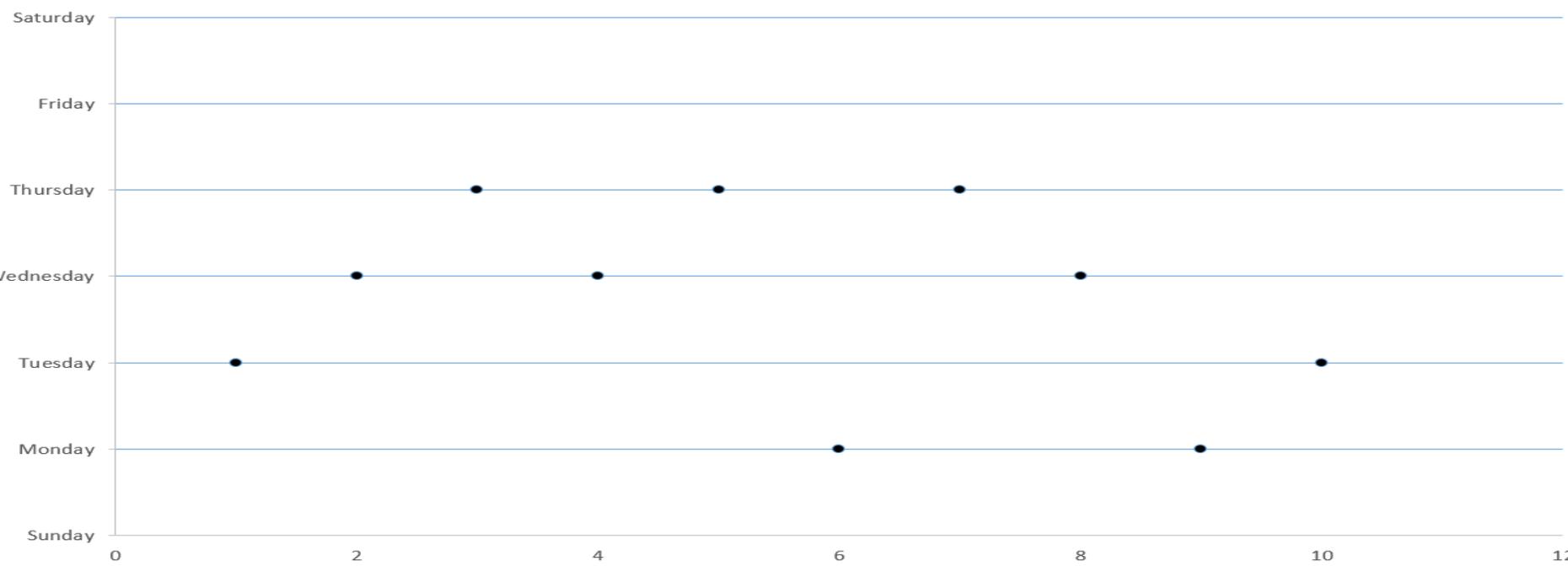
**Predictable
w/ Gaps**

ACME TRANSIT - Random Testing Throughout The Week



 **GOOD!**

SUNRAY TRANSIT - Random Testing Throughout The Week



 **Predictable
w/ Gaps**

Common Drug & Alcohol Findings

Custody and Control Form (CCF) & Alcohol Testing Form (ATF) Review

- You must be reviewing ALL CCFs/ATFs
 - As you receive them, not “periodically”
 - If errors found, they must be addressed and documented
- CCF/ATF Review Tools (available from GDOT)
 - Helps you conduct the review comprehensively
 - Everything required on the form must be completed
 - Review what is completed for accuracy
- Sample Affidavits of Correction (available from GDOT)

Common Drug & Alcohol Findings

UPDATE!!! -- REVISED CCF MUST BE USED

- Timeline:
 - 8/17/2020: OMB approved revised CCF
 - 6/1/2021: “Revised” CCF widely available for use
 - **8/30/2021**: “Revised CCF **MUST** be used
 - If old form used, MFR **MUST** be completed, or test is canceled
- “How Do I Know If My Collection Site is Using the “Revised” CCF or Not?”
 - See “yellow” highlights on next slide



FEDERAL DRUG TESTING CUSTODY AND CONTROL FORM

SPECIMEN ID NO. 0000001

ACCESSION NO.

STEP 1: COMPLETED BY COLLECTOR OR EMPLOYER REPRESENTATIVE

A. Employer Name, Address, I.D. No. _____ B. MRO Name, Address, Phone No. _____

C. Donor SSN, Employee I.D., or **CDL State and No.** _____

D. Specify Testing Authority: HHS NRC Specify DOT Agency: FMCSA FAA FRA FTA PHMSA USCG

E. Reason for Test: Pre-employment Random Reasonable Suspicion/Cause Post Accident Return to Duty Follow-up Other (specify) _____

F. Drug Tests to be Performed: THC, COC, PCP, OPI, AMP THC & COC Only Other (specify) _____

G. Collection Site Address: _____ Collector Contact Info: Phone _____
 Fax _____
 Other _____

NOTE: Use of CDL for FTA tests is PROHIBITED

STEP 2: COMPLETED BY COLLECTOR (make remarks when appropriate). URINE ORAL FLUID

COLLECTION: Split Single None Provided, Enter Remark.

URINE: Collector reads urine temperature within 4 minutes. Temperature between 90° and 100° F? Yes No, Enter Remark Observed, Enter Remark

ORAL FLUID: Split Type: Serial Concurrent Subdivided Each Device Within Expiration Date? Yes No Volume Indicator(s) Observed

REMARKS: _____

STEP 3: Collector affixes seal(s) to bottle(s)/tube(s). Collector dates seal(s). Donor initials seal(s). Donor completes STEP 5 on Copy 2 (MRO Copy)

STEP 4: CHAIN OF CUSTODY - INITIATED BY COLLECTOR AND COMPLETED BY TEST FACILITY

I certify that the specimen given to me by the donor identified in the certification section on Copy 2 of this form was collected, labeled, sealed and released to the Delivery Service noted in accordance with applicable federal requirements.

X _____
 Signature of Collector

_____ / / _____ AM
 (PRINT) Collector's Name (First, MI, Last) Date (Mo/Day/Yr) Time of Collection PM

SPECIMEN BOTTLE(S)/TUBE(S) RELEASED TO:

 Name of Delivery Service

STEP 5: COMPLETED BY DONOR

I certify that I provided my specimen to the collector; that I have not adulterated it in any manner; each specimen bottle/tube used was sealed with a tamper-evident seal in my presence; and that the information provided on this form and on the label affixed to each specimen bottle/tube is correct.

X _____
 Signature of Donor

_____ / / _____
 (PRINT) Donor's Name (First, MI, Last) Date (Mo/Day/Yr)

Email address: _____ Daytime Phone No. () _____ Evening Phone No. () _____ Date of Birth _____
 (Mo/Day/Yr)

After the Medical Review Officer receives the test results for the specimen identified by this form, he/she may contact you to ask about prescriptions and over-the-counter medications you may have taken. Therefore, you may want to make a list of those medications for your own records. THIS LIST IS NOT NECESSARY. If you choose to make a list, do so either on a separate piece of paper or on the back of your copy (Copy 5). - DO NOT PROVIDE THIS INFORMATION ON THE BACK OF ANY OTHER COPY OF THE FORM. TAKE COPY 5 WITH YOU.