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of Transportation  
**Federal Transit  
Administration**

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**August 12, 2016**

Mr. Gary Poulson  
Chair, Transit and Parking Commission  
City of Madison  
637 Charles Lane  
Madison, Wisconsin 53711

**Re: FY 2016 Triennial Review – Final Report**

Dear Mr. Poulson:

The enclosed final report documents the Federal Transit Administration's (FTA) Triennial Review of the City of Madison, Wisconsin. 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 of Madison'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 of Madison's compliance in 17 areas. No deficiencies were found with the FTA requirements in 15 areas. Deficiencies were found in two areas: Legal and Charter Bus. The City of Madison had no repeat deficiencies from the 2013 Triennial Review.

Please send corrective actions before the due date specified in this final report to Ms. Kelley Brookins, Acting Director, Office of Program Management and Oversight, at [kelley.brookins@dot.gov](mailto:kelley.brookins@dot.gov). If the City of Madison requires additional time to complete the corrective actions, please contact Ms. Brookins via email before the due date and request a time extension along with written justification for review by FTA. If we do not receive a response by the due date, it will be considered late. Non-response may jeopardize your agency's ability to receive future federal funding. Please notify our office if there are extenuating circumstances for our consideration.

Thank you for the City of Madison's cooperation and assistance during this Triennial Review.

Sincerely,

A handwritten signature in black ink, appearing to read "Marisol R. Simón". The signature is written in a cursive style with a large initial "M".

Marisol R. Simón  
Regional Administrator

Enclosure

cc: Kelley Brookins, FTA  
Lisa Joiner, FTA  
Charles Kamp, City of Madison  
Nancy Coburn, AdSTM

***FINAL REPORT***

**FY 2016 TRIENNIAL REVIEW**

of the

**City of Madison  
(Metro)  
Madison, Wisconsin  
Recipient ID: 1910**

*Performed for:*

**U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL TRANSIT ADMINISTRATION  
REGION V  
Chicago, Illinois**

*Prepared by:*

**Advanced Systems Technology & Management, Inc.  
under subcontract to Qi Tech, LLC**

**Scoping Meeting Date: February 4, 2016  
Site Visit Dates: June 9-10, 2016  
Final Report Date: August 12, 2016**

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## I. Executive Summary

This report documents the Federal Transit Administration’s (FTA) Triennial Review of the City of Madison, Wisconsin. Nancy Coburn, of AdSTM, Inc., performed the review under subcontract to Qi Tech, LLC. During the site visit, administrative and statutory requirements were discussed and documents were reviewed. The City of Madison’s transit facilities were toured to provide an overview of activities related to FTA-funded projects.

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

Review Area	Deficiencies	
	Code	Description
Legal	D-77	Grantee did not submit OMB Standard Form LLL/ quarterly update
Charter	D-53	Charter reporting issues

## **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 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.” 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 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 of Madison. 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 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 V Office on February 4, 2016. 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 of Madison 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 of Madison occurred on June 7-8, 2016.

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 toured the City of Madison’s administrative offices and the adjacent maintenance facility as well as the North Transfer Center to provide an overview of activities related to FTA-funded projects. The reviewers examined a sample of maintenance records for FTA-funded vehicles, facilities, and equipment. Upon completion of the review, FTA and the reviewers provided a summary of preliminary findings to the City of Madison 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

The City of Madison, located in south central Wisconsin, is the state capital and the county seat of Dane County. The City has a mayor-council form of government. The City's Transit and Parking Commission provides policy guidance and advises the Common Council on transit matters. The Transit Commission consists of 11 members (nine voting members and two alternates) all appointed by the Mayor and confirmed by the Common Council. Three commissioners are Common Council members and eight are citizen members.

The General Manager reports to the Mayor and is responsible for the City of Madison's public transit system, known as Metro. The City directly operates all Metro fixed-route service and provides ADA complementary paratransit service both directly and through contractors. Metro fixed routes operate throughout the Madison city limits and in the adjacent communities of Fitchburg, Middleton, and Verona. The service area population is approximately 253,075. The City of Madison has five subrecipients that provide shared-ride taxi, general demand-response services, or mobility management services funded by Sections 5307, 5309, or 5310 grants.

#### 2. Services

Metro service consists of 62 fixed routes. Service is provided weekdays from 4:51 a.m. to 2:08 a.m. Saturday service operates from 5:56 a.m. to 3:19 a.m. Sunday service operates from 6:56 a.m. to 2:08 a.m. Metro's ADA complementary paratransit service operates during the same days and hours of service as the fixed routes.

The basic adult fare for bus service is \$2.00. A reduced fare of \$1.00 is offered to senior citizens over 65 years of age, persons with disabilities, and Medicare cardholders during all hours of service. The fare for students through high school is \$1.20. The fare for ADA complementary paratransit service is \$3.25. Various multi-ride ticket and pass options are also offered.

Metro uses a fleet of 215 buses for fixed-route service. Its bus fleet consists of 40-foot standard and low-floor transit coaches, including hybrid buses. The current peak requirement is 182 vehicles for a spare ratio of 18 percent. Metro also has a fleet of 17 vehicles that it directly operates for ADA complementary paratransit services. This service is supplemented with contractor-owned vehicles.

Metro operates from a maintenance facility at 1101 East Washington Avenue in Madison. Administrative offices are nearby in leased space at 1425 East Washington Avenue. Fixed-route service is oriented around four transfer centers located north, south, east, and west of downtown Madison. All facilities have FTA interest.



The City of Madison’s National Transit Database Report for fiscal year 2015 provided the following financial and operating statistics for its fixed-route and paratransit service:

<b>Operating Statistic</b>	<b>Fixed-Route Service</b>	<b>Paratransit Service</b>
Unlinked Passengers	15,223,961	268,356
Revenue Hours	403,466	103,986
Operating Expenses	\$44,909,155	\$6,762,164

### 3. Grant and Project Activity

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

<b>Grant Number</b>	<b>Grant Amount</b>	<b>Year Executed</b>	<b>Description</b>
WI-79-1000	\$950,000	2011	Downtown Madison Intermodal Terminal
WI-04-0042	\$150,000	2011	Design of Maintenance/Admin Facility
WI-16-X005	\$539,184	2014	FY13 -14 Section 5310
WI-26-0012	\$990,000	2006	2006 Section 5314 – Transport 2020
WI-34-0006	\$787,029	2014	FY14 Section 5339 Bus Replacements
WI-39-0002	\$750,000	2007	2007 Section 5339 – Alternative Analysis
WI-54-0003	\$750,371	2014	FY2014 SGR Vehicle Replacements
WI-79-1001	\$300,000	2015	Forward Madison Urban Footprint
WI-90-X573	\$7,065,939	2010	FY2010 PM, Bus, Misc. Capital and Planning
WI-90-X595	\$7,120,494	2013	FY13 5307 Equipment/Bus
WI-90-X735	\$7,083,955	2012	FY2012 Sct 5307 PM, Bus, Misc. Cap., Plng
WI-90-X765	\$7,710,316	2014	FY2014 Sct 5307 PM, Bus, Misc. Cap., Plng
WI-95-X052	\$4,437,000	2015	FY15 Surface Transportation Program

During the review period, the City of Madison procured 15 Gillig 40-foot low-floor replacement buses and a new farebox system. There are no ongoing projects other than operations and maintenance of current services. Over the next three to five years, the City of Madison plans to construct a new maintenance facility, implement a bus rapid transit system, and replace the current automatic vehicle location 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 the City of Madison, 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 the City of Madison, 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 the City of Madison, no deficiencies were found with the FTA requirements for Maintenance.

### 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 the City of Madison, 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.

*Note:* The fiscal year 2016 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 of Madison, 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, provided that 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 the City of Madison, no deficiencies were found with the FTA requirements for Procurement.

## 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 the City of Madison, no deficiencies were found with the US DOT requirements for DBE.

## 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 the City of Madison, deficiencies were found with the FTA requirements for Legal.

*Grantee did not submit OMB Standard Form LLL/quarterly update (77)*

The City of Madison uses non-federal funds for lobbying activities related to law enforcement, public health, and other non-transit issues. The City provided copies of the quarterly disclosure forms filed by Simon and Company, the lobbying firm, with the Clerk of the House of Representatives and the Secretary of the Senate. However, when lobbying services are procured with non-Federal funds, a grantee is required to submit to the FTA regional counsel the Office of Management and Budget disclosure form (OMB Standard Form LLL (Rev.7-97)). The LLL form is used to disclose to FTA that the City of Madison has hired a lobbyist for the purposes of attempting to influence a covered federal action, such as the award of a federal grant or cooperative agreement exceeding \$100,000. Quarterly updates to OMB Standard Form LLL are required for each calendar quarter in which any event occurs, such as a change in lobbyist, that materially affects the accuracy of the information contained in any previously filed disclosure form. The City of Madison has not filed the Standard Form LLL disclosure with the FTA regional counsel.

**Corrective Action and Schedule: By November 14, 2016, the City of Madison must submit to the FTA Region V Counsel the OMB Standard Form LLL disclosure of its lobbying activities along with documentation of a process to ensure that quarterly updates, if required, are provided in a timely way in the future.**

## 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 of Madison, no deficiencies were found with the FTA requirements for Satisfactory Continuing Control.

## 10. Planning/Program of Projects

Basic Requirement: The grantee must participate in the transportation planning process in accordance with FTA, Moving Ahead for Progress in the 21<sup>st</sup> Century, 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 of Madison, no deficiencies were found with the FTA requirements for Planning/POP.

## 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 of Madison, 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 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: During this Triennial Review of the City of Madison, 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 of Madison, deficiencies were found with the FTA requirements for Charter Bus.

### *Charter reporting issues (53)*

The City of Madison provided three charter trips under the Government Officials exception during the review period. Grantees that provide charter service under this exception must report required information about the trip on the FTA charter website on a quarterly basis. The City of Madison did not report these trips.

**Corrective Actions and Schedule: By November 14, 2016, the City of Madison must file the missing quarterly reports in the FTA charter website and must submit to FTA Region V procedures for filing the required information for all applicable exceptions on time in the future.**

## 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 of Madison, 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 of Madison, no deficiencies were found with the FTA requirements for Security.

## 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 the City of Madison, 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: 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 the City of Madison, no deficiencies were found with the FTA requirements for Equal Employment Opportunity (EEO).

## V. Summary of Findings

Review Area	Finding	Deficiency	Corrective Action	Response Date	Date Closed
1. Financial Management and Capacity	ND				
2. Technical Capacity	ND				
3. Maintenance	ND				
4. ADA	ND				
5. Title VI	ND				
6. Procurement	ND				
7. DBE	ND				
8. Legal	D-77	Grantee did not submit OMB Standard Form LLL/ quarterly update	Submit to the FTA Region V Counsel the OMB Standard Form LLL disclosure of lobbying activities along with documentation of a process to ensure that quarterly updates, if required, are provided in a timely way in the future.	11/14/2016	
9. Satisfactory Continuing Control	ND				
10. Planning/POP	ND				
11. Public Comment on Fare Increases and Major Service Reductions	ND				
12. Half Fare	ND				
13. Charter Bus	D-53	Charter reporting issues	File the missing quarterly reports in the FTA charter website. Submit to FTA Region V procedures for filing the required information for all applicable exceptions on time in the future.	11/14/2016	
14. School Bus	ND				
15. Security	ND				
16. Drug-Free Workplace/ Drug and Alcohol Program	ND				
17. EEO	ND				

## VI. Attendees

Name	Title	Phone Number	E-mail Address
<b><i>City of Madison</i></b>			
Drew Beck	Transit Planning and Scheduling Manager	608-266-6599	dbeck@cityofmadison.com
Wayne Block	Transit Finance Manager	608-267-8766	wblock@cityofmadison.com
Mike Cechvala	Transportation Planner II	608-266-4518	mcechvala@cityofmadison.com
Norman D. Davis	Division Manager, Department of Civil Rights	608-267-8759	ndavis@cityofmadison.com
James Fink	Building, Grounds and Maintenance Supervisor	608-267-4951	jfink@cityofmadison.com
Robin Jahn	Transit General Maintenance Supervisor	608-266-8801	rjahn@cityofmadison.com
Chuck Kamp	Transit General Manager	608-266-4904	ckamp@cityofmadison.com
Scott D. Korth	Transit Accountant	608-266-6538	skorth@cityofmadison.com
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Colier McNair	Contract Compliance Specialist	608-267-6510	cmcnair@cityofmadison.com
Mick Rusch	Marketing and Customer Service Manager	608-266-6532	mrusch@cityofmadison.com
Nancy Senn	Paratransit Program Manager	608-267-8654	nsenn@cityofmadison.com
<b><i>FTA Region V</i></b>			
Sheila J. Clements	Director, Office of Program Management & Oversight	312-353-1552	sheila.clements@dot.gov
Marisa Appleton	Civil Rights Officer for Oversight	312-705-1270	marisa.appleton@dot.gov
Lisa Joiner	Transportation Program Specialist	312-353-2791	lisa.joiner@dot.gov
<b><i>Reviewer</i></b>			
Nancy L. Coburn	AdSTM, Inc.	216-570-2719	nancy.coburn@adstm.com



## **VII. Appendices**

No appendices included in this report.