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**Federal Transit  
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**AUG 29 2017**

Mayor Robert G. Rolison  
City of Poughkeepsie  
Poughkeepsie Transit System  
62 Civic Center Plaza  
Poughkeepsie, NY 12601

**Re: Federal Transit Administration (FTA) Fiscal Year 2017 Triennial Review – Final Report**

Dear Mayor Rolison:

The enclosed final report documents the FTA's Triennial Review of the Poughkeepsie Transit System, (PTS), in City of Poughkeepsie, New York. This review is required by Chapter 53 of Title 49. Although not an audit, the Triennial Review is the FTA's assessment of Poughkeepsie'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 PTS's compliance in 17 areas. No deficiencies were found with the FTA requirements in 16 areas. Deficiencies were found in one area: Procurement. PTS had no repeat deficiencies from the 2014 Triennial Review. Subsequent to the site visit, Poughkeepsie provided corrective action responses in the Procurement area. FTA's assessment of the submission is presented in the Procurement section of the final report that follows.

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 Ms. Rosie Luperena at (212) 668-2185 or [rosaria.luperena@dot.gov](mailto:rosaria.luperena@dot.gov), or Mr. Derek Davis, your reviewer, at (773) 612-7020 or [tlcderekd3@gmail.com](mailto:tlcderekd3@gmail.com).

Thank you,

  
Stephen Goodman, P.E.  
Regional Administrator

Enclosure

cc: D. McDonnell, City of Poughkeepsie (via email); M. Nelson, City of Poughkeepsie (via email); K. Sorrell, City of Poughkeepsie (via email); A. Carr, FTA (via email); D. Davis, FTA (via email); L. Bailey, FTA Regional Civil Right Officer (via email); M. Culotta, FTA (via email); R. Luperena, FTA (via email); D. Davis, CDI/DCI Joint Venture (via email); L. Barnes, CDI/DCI Joint Venture; O. Fonseca, CDI/DCI Joint Venture (via email)

**FINAL REPORT**

**FISCAL YEAR 2017  
TRIENNIAL REVIEW**

of

**City of Poughkeepsie Transit System (Poughkeepsie)  
City of Poughkeepsie, NY**

**Recipient ID: 2062**

*Performed for:*

**U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL TRANSIT ADMINISTRATION  
REGION 2**

*Prepared By:*

**CDI/DCI, Joint Venture**

**Scoping Meeting Date: February 2, 2017**

**Site Visit Date: July 11-12, 2017**

**Draft Report Date: August 2, 2017**

**Final Report Date: August 29, 2017**

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## I. Executive Summary

This report documents the Federal Transit Administration's (FTA) Triennial Review of the Poughkeepsie Transit System, (PTS), in City of Poughkeepsie New York. The review was performed by CDI/DCI Joint Venture. During the site visit, administrative and statutory requirements were discussed and documents were reviewed. City of Poughkeepsie Transit System's transit facilities were toured to provide an overview of activities related to FTA-funded projects.

PTS ceased providing public transit service on Friday, June 30, 2017. Since PTS has ceased providing public transit service, FTA will document this triennial review as the final review of the PTS transit operation. PTS is currently working with the FTA on a disposition plan to document all FTA-funded assets. The proposed plan will identify FTA-funded assets City of Poughkeepsie will request to maintain, to dispose of and to transfer to the Dutchess County Transit in City of Poughkeepsie NY. The disposition plan will require an agreement between City of Poughkeepsie and Dutchess County and prior approval of all disposition actions by the FTA prior to implementation and completion.

The 2017 Triennial Review focused on PTS's compliance in 17 areas. Deficiencies were found in the one area listed below.

Review Area	Deficiencies	
	Code	Description
Procurement	D-740	Procurement policies not current/complete.

Subsequent to the site visit, Poughkeepsie provided corrective action responses in the Procurement area. FTA's assessment of the submission is presented to the Procurement section of the final 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 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 Poughkeepsie Public Transit System in City of Poughkeepsie New York. 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/desk review with the FTA regional office, and an on-site visit to the grantee’s location. The review scoping meeting/desk review was conducted with the FTA Region II Office on February 2, 2017. Necessary files retained by the regional office were sent to the reviewer electronically. A grantee information request and review package was sent to the Poughkeepsie advising it of the site visit and indicating information that would be needed and issues that would be discussed. The site visit to the Poughkeepsie occurred on July 11 and 12, 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 Poughkeepsie Transit System’s transit/maintenance facilities to provide an overview of activities related to FTA-funded projects.

The reviewers examined a sample of maintenance records for FTA-funded vehicles and equipment. Upon completion of the review, FTA and the reviewers provided a summary of preliminary findings to Poughkeepsie Transit System 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**

#### **Organization**

Transit service in the Poughkeepsie metropolitan area was provided by the Poughkeepsie Transit System, a division of the City's Department of Public Works. The City has a contract with Dutchess County to provide ADA and paratransit service. The bus system serves the Poughkeepsie and the towns of City of Poughkeepsie and Hyde Park. The population of the service area is approximately 55,000 people.

The Poughkeepsie Transit System and Dutchess County Mass Transit, after multiple studies, dozens of public meetings and opportunities for public comment, in fulfillment of recommendations made by various committees and or task-forces, including the City's Strategic Fiscal Stabilization document prepared by Capital Markets, LLC., have consolidated transit service in order to better serve the local community and reduce costs.

The City has discontinued bus service, effective June 30, 2017, and has worked extensively with NYSDOT, FTA, and other stakeholders to coordinate a smooth transition for all riders, residents and businesses. As of this writing, the County has already further expanded service within the community, by adding an additional route to the service which existed as of the consolidation date.

#### **Services**

The City's bus system operated a network of six fixed routes. Service was provided Monday through Friday from 6:30 a.m. to 6:30 p.m. and Saturdays from 6:30 a.m. to 3:30 p.m. There was no service on Sundays, although it should be noted that, after the recent consolidation of service with the County system there is now Sunday service provided to the community.

The basic adult fare for bus service was \$1.75. A reduced fare of \$0.75 was offered at all times to persons with disabilities, seniors, veterans and Medicare cardholders. The student fare was \$0.75 for elementary and secondary city school students and children ages 6-11. The fare for children under six was free. The City operated a fleet of eight FTA-funded buses for fixed-route service. The City's bus fleet consisted of 35- and 40-foot transit coaches. The peak requirement was six vehicles.

The City's bus system operated from a single maintenance and administration facility, located at 26 Howard Street, in the Poughkeepsie, which it shares with other City-owned vehicles. The maintenance facility was partially funded with FTA funds. The buses are housed in another City funded garage. The City opened a new, state-of-the-art Transit Hub located at Civic Center Plaza in 2013. The Transit Hub includes passenger shelters, transportation service information, and other amenities in a well-light and safe environment.

The City of Poughkeepsie's National Transit Database Report for FY 2016 provided the following financial and operating statistics for the fixed-route service:

<b>Operating Statistic</b>	<b>Fixed-Route Service</b>
Unlinked Passengers	2,888,061
Revenue Hours	4,591
Operating Expenses	1,301,606

### **Grant Activity**

The City of Poughkeepsie did not have any active grants at the time of the review. The City of Poughkeepsie does have one pending grant for previous preventative maintenance and operating assistance expenses.

### **Completed Projects**

The City completed the purchase of a service vehicle, garage equipment, fareboxes, as well as, replacement batteries for the hybrid buses and security cameras for the buses. Miscellaneous projects at the Transit Hub including a kiosk, security cameras and intelligent transportation information systems, have also been completed.

### **Projects Underway**

The City does not have any projects underway.

### **Future Projects**

The Poughkeepsie has discontinued transit service. The City has no future projects planned.



## **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 Poughkeepsie, 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 Poughkeepsie, 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 Poughkeepsie, 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 Poughkeepsie, 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 the City of Poughkeepsie, 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 Poughkeepsie, a deficiency was found with the FTA requirements for Procurement.

*D-740: Procurement policies not current/complete.*

The Common Grant Rule (49 U.S.C. Section 5325(a) and (h)) and the Super Circular (2 CFR 200), require grantees to have written procurement procedures. In addition, by implication, the Common Grant Rule and Super Circular for non-state governmental grantees require written procurement procedures as a condition of self-certification. During the review of City of Poughkeepsie’s procurements, it was observed that while the grantee was compliant and applying the appropriate policies and procedures, some of the applied steps were not in written form.

### Corrective Action(s) and Schedules:

By October 26, 2017, Poughkeepsie should submit to FTA Regional Office, procurement policies and procedures that fully reflect and document their current and complete procurement processes and procedures. Poughkeepsie provided correction action responses sufficient to address the finding in the Procurement area. The finding was closed on July 17, 2017.

## 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 Poughkeepsie, 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 Poughkeepsie, no deficiencies were found with the FTA requirements for Legal.

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

The Poughkeepsie Transit System ceased its operations of public transit service on Friday, June 30, 2017. As of July 1, 2017, Dutchess County began immediate operation of all public transit services previously provided by the Poughkeepsie Transit System for City of Poughkeepsie, NY. As a part of this cease of operations process, City of Poughkeepsie is currently developing a disposition plan that will identify all FTA-funded assets and City of Poughkeepsie's proposed actions to dispose of all FTA-funded assets. The disposition plan will identify the assets that will be requested to be:

- transferred to Dutchess County;
- maintained by the Poughkeepsie (Department of Public Works); and,
- disposed of by the City of Poughkeepsie.

All assets identified in the disposition plan will be disposed of in accordance with the disposition provisions of FTA Circular 5010.1E. The City of Poughkeepsie submitted a disposition plan for FTA approval.

## **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 the City of Poughkeepsie, 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 Poughkeepsie, 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 Poughkeepsie, 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 Poughkeepsie, no deficiencies were found with the FTA requirements for Charter Bus.

## **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 Poughkeepsie, 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 Poughkeepsie, 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 Poughkeepsie, 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 Poughkeepsie, 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	ND				
4. ADA	ND				
5. Title VI	ND				
6. Procurement	D-740	Procurement polices not current/complete.	City of Poughkeepsie should submit to FTA Regional Office, procurement policies and procedures that fully reflect and document their current and complete procurement processes and procedures.	October 26, 2017	July 17, 2017
7. DBE	ND				
8. Legal	ND				
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	ND				
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 Poughkeepsie</i></b>			
George J. McGann	Safety Coordinator	(845) 451-4123	gmcgann@cityofpoughkeepsie.com
Karen Sorrell	Deputy Commissioner Finance	(845) 451-4211	ksorrell@cityofpoughkeepsie.com
Chris Gent	Commissioner Public Works	(845) 451-4100	cgent@cityofpoughkeepsie.com
Shirly Davison	Purchasing Agent	(845) 451-4048	sdavison@cityofpoughkeepsie.com
Debbie McDonnell	City Administrator	(845) 451-4075	dmcdonnell@cityofpoughkeepsie.com
Michael J. Innello	Garage Supervisor	(845) 451-4117	minnello@cityofpoughkeepsie.com
Marc Nelson	Commissioner of Finance	(845) 451-4027	mnelson@cityofpoughkeepsie.com
<b><i>FTA</i></b>			
Stephen Goodman	Regional Administrator, TRO-02	(212) 668-2170	stephen.goodman@dot.gov
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Lynn Bailey	Acting Regional Civil Rights Officer, TRO-02	(215) 656-7121	lynn.bailey@dot.gov
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<b><i>CDI/DCI, Joint Venture</i></b>			
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## **VII. Appendices**

No appendices included in this report.