U.S. Department
of Transportation
**Federal Transit
Administration**

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June 13, 2022

Mr. Anthony Broadman
Board Chair
Central Oregon Intergovernmental Council d/b/a Cascades East Transit
334 NE Hawthorne Avenue
Bend, OR 97701

Re: Federal Transit Administration (FTA) Fiscal Year 2022 Triennial Review– Final Report

Dear Councilor Broadman:

I am pleased to provide you with a copy of this FTA report as required by 49 U.S.C. Chapter 53 and other Federal requirements. The enclosed final report documents the FTA's Triennial Review of Central Oregon Intergovernmental Council d/b/a Cascade East Transit in Bend, OR. Although not an audit, the Triennial Review is the FTA's assessment of Cascade East Transit's compliance with Federal requirements, determined by examining a sample of award 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 award requirements.

Due to the Coronavirus 2019 (COVID-19) Public Health Emergency, a virtual site visit was conducted for this Triennial Review. In addition, the review was expanded to address Cascade East Transit's compliance with the administrative relief and flexibilities FTA granted and the requirements of the COVID-19 Relief funds received through the Coronavirus Aid, Relief, and Economic Security (CARES) Act, the Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA) of 2021, and the American Rescue Plan (ARP) Act of 2021.

The Triennial Review focused on Cascade East Transit's compliance in 23 areas. No deficiencies were found with the FTA requirements in any of these areas. Therefore, Cascade East Transit had no repeat deficiencies from the Fiscal Year 2018 Triennial Review.

Regulations and Guidance

As Cascade East Transit moves forward with its program, the FTA would like to provide a look-ahead for future oversight activities related to Cybersecurity Certification for Rail Rolling Stock and Operations.

The National Defense Authorization Act for Fiscal Year 2020, Pub. L. 116-92, §7613 promulgated the addition of U.S.C. Section 5323(v). This new requirement instructs recipients that operate rail fixed guideway public transportation systems to certify to FTA that it established a process to develop, maintain, and execute a written plan for identifying and reducing

cybersecurity risks. Recipients are to use the approach described in the voluntary standards and best practices developed by the National Institute of Standards and Technology (NIST) and the Secretary of Homeland Security in consultation and coordination with various stakeholders. Recipients are to also identify hardware and software it determines should be tested and analyzed by a third party to mitigate cybersecurity risk.

For the fiscal year 2022 review cycle, FTA has deployed a "soft launch" in determining, if and how, recipients are developing their plan for identifying and reducing cybersecurity risks. Recipients are to certify in the Transit Award Management System (TrAMS) by completing Category 20 of the Annual Certifications and Assurances to indicate their compliance with this requirement. For the fiscal year 2025 review cycle, this requirement will be reviewed for full compliance.

For additional information about the cybersecurity framework, visit the NIST's website at: https://www.nist.gov/cyberframework/framework.

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 Mr. Scot Rastelli, Transportation Program Specialist, at 206-220-7965 or by email at scot.rastelli@dot.gov.

Sincerely,

LINDA M GEHRKE

Digitally signed by LINDA M GEHRKE
Date: 2022.06.13 14:17:48 -07'00'

Linda M. Gehrke
Regional Administrator

cc: Tammy Baney, Central Oregon Intergovernmental Council
Drew Orr, Central Oregon Intergovernmental Council
Scot Rastelli, FTA Region 10
Kristin Tighe, Milligan Consulting, LLC

Enclosure

FINAL REPORT

FISCAL YEAR 2022
TRIENNIAL REVIEW

of

Central Oregon Intergovernmental Council
d/b/a Cascades East Transit
Bend, OR
ID: 7112

Performed for:

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION
REGION 10

Prepared By:

Milligan Consulting, LLC

Desk Review/Scoping Meeting Date: March 8, 2022
Virtual Site Visit Entrance Conference Date: April 1, 2022
Virtual Site Visit Exit Conference Date: April 15, 2022
Final Report Date: June 13, 2022

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I. Executive Summary

This report documents the Federal Transit Administration's (FTA) Triennial Review of the Central Oregon Intergovernmental Council d/b/a Cascade East Transit of Bend, OR. The FTA wants to ensure that awards are administered in accordance with the requirements of Federal public transportation law 49 U.S.C. Chapter 53. The review was performed by Milligan Consulting, LLC. During the site visit, administrative and statutory requirements were discussed, and documents were reviewed.

Due to the Coronavirus 2019 (COVID-19) Public Health Emergency, a virtual site visit was conducted for this Triennial Review. In addition, the review was expanded to address Kitsap Transit's compliance with the administrative relief and flexibilities FTA granted and the requirements of the COVID-19 Relief funds received through the Coronavirus Aid, Relief, and Economic Security (CARES) Act, the Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA) of 2021, and the American Rescue Plan (ARP) Act of 2021. Cascade East Transit was also requested to share if and/or how it suspended, deviated from, or significantly updated or altered its transit program due to the public health emergency.

The Triennial Review focused on Cascade East Transit's compliance in 23 areas. Any deficiencies related to the COVID-19 Relief funds have been clearly identified as part of the deficiency description in the respective review area. For this review, no deficiencies were found with the FTA requirements in any of the review areas.

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 Triennial Review was performed in accordance with the FTA procedures (published in FTA Order 9010.1B, April 5, 1993).

The Triennial Review includes a review of the recipient's compliance in 23 areas. The basic requirements for each of these areas are summarized in Section IV.

This report presents the findings from the Triennial Review of Cascade East Transit. The review concentrated on procedures and practices employed since Cascade East Transit's previous Triennial Review; however, coverage was extended to earlier periods as needed to assess the policies in place and the management of award funds. The specific documents reviewed and referenced in this report are available at the FTA's regional office or the recipient's office.

2. Process

The Triennial Review includes a pre-review assessment, a desk review and scoping meeting with the FTA regional office, and a site visit to the recipient's location. Due to the COVID-19 Public Health Emergency, a virtual site visit was conducted of each recipient. In addition, the review was expanded to address the recipient's compliance with the administrative relief and flexibilities FTA granted and the requirements of the COVID-19 relief funds received through the CARES Act, CRRSAA of 2021, and the ARP Act of 2021. Recipients were also requested to share if and/or how it suspended, deviated from, or significantly updated or altered its transit program due to the public health emergency.

The fiscal year (FY) 2022 process began with the regional office transmitting, a recipient information request (RIR) to Cascade East Transit on November 26, 2021 indicating a review would be conducted. While Cascade East Transit prepared its response to the RIR, the regional office and review team conducted a desk review and scoping meeting on March 8, 2022. Necessary files retained by the regional office were sent to the reviewers electronically. Following the desk review and scoping meeting, the reviewers and the recipient corresponded and exchanged information and documentation in preparation for the virtual site visit. As a result of this review, an agenda package indicating the issues that would be discussed, records to be reviewed, and interviews to be conducted was then sent to Cascade East Transit on March 31, 2022. The virtual site visit to Cascade East Transit occurred from April 1, 2022 (entrance conference) to April 15, 2022 (exit conference).

The virtual site visit portion of the review began with an entrance conference, at which the purpose of the Triennial Review and the review process were discussed. The reviewers conducted additional interviews and reviewed documentation to evidence Cascade East Transit's

compliance with FTA requirements.

Upon completion of the site visit, the FTA and the reviewers provided a summary of preliminary findings to Cascade East Transit at an exit conference. Section VI of this report lists the individuals participating in the site visit.

3. Metrics

The metrics used to evaluate whether a recipient is meeting the requirements for each of the areas reviewed are:

- Not Deficient: An area is considered not deficient if, during the review, nothing came to light that would indicate the requirements within the area reviewed were not met.
- 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 recipient does not conduct activities for which the requirements of the respective area would be applicable.

III. Recipient Description

1. Organization

COIC was established in 1972 as an Oregon municipal corporation and intergovernmental entity. A 19-member board governs COIC, with representatives from member governments: the counties of Crook, Deschutes, and Jefferson; and the cities of Bend, Culver, Madras, Metolius, Prineville, Redmond, La Pine, and Sisters; and the Confederate Tribes of Warm Springs. Five appointed members representing the interests of the private business sector, workforce development, and education also serve on the COIC Board.

COIC began operating Sections 5310- and 5311-funded transit service for rural areas within Crook, Deschutes, and Jefferson counties under the name of Cascades East Transit in 2008. COIC became the direct recipient of FTA's Section 5307 funds for the Bend urbanized area in February 2012 and assumed operation of the former Bend Area Transit from the City of Bend.

At present, COIC provides both urban and rural public transportation services and serves the communities of Bend, Culver, LaPine, Madras, Warm Springs, Metolius, Prineville, Redmond, Sisters, and during the winter season to the Mt. Bachelor Ski Resort. In addition, COIC operates Ride the River, Ride Bend, and Lava Butte, seasonal shuttle services that are available seven days a week from late June to early September. COIC contracts with Paratransit Services, Inc. for service in Bend. The service area population for FTA's Section 5307-funded service in Bend is 91,112.

Fixed-route and Americans with Disabilities Act (ADA) complementary paratransit services operate between 6:00 a.m. and 7:30 p.m. weekdays and between 7:30 a.m. and 5:30 p.m. on Saturdays. On Sundays, only Bend Dial-a-Ride service is provided; hours of operation are between 8:15 a.m. and 3:15 p.m.

The base fare is $1.50 for fixed-route service. The reduced fare for seniors, passengers with disabilities, and Medicare Cardholders is $0.75. A full fare day pass is offered for $2.50 for fixed-route travel. The reduced fare day pass is $1.25. The ADA complementary paratransit fare is $2.50.

Vehicles used in the fixed-route and ADA complementary paratransit services are all FTA-funded and are garaged and maintained at COIC's maintenance facility located at 1250 Bear Creek Road in the City of Bend. The facility also includes offices for COIC's operations staff. There is no federal interest in the facility, which had been constructed by the City of Bend prior to COIC assuming operation of transit service within the City.

2. Award and Project Activity

Below is a list of Cascade East Transit's open awards at the time of the review.

Award Number	Award Amount	Year Executed	Description
OR-2019-042	$61,374	2019	Fiscal Year 2019 STBG to 5307 Engineering, Design, Purchase, and Construct Community Connector Bus Stop Enhancements
OR-2020-020	$3,871,978	2020	Coronavirus Aid Relief and Economic Security ACT - Fiscal Year 2020 Section 5307 Operating Assistance, American Disabilities Act Paratransit Service, Preventive Maintenance, Project Administration, Security Services and Security Equipment for Central Oregon Intergovernmental Council
OR-2019-041	$1,371,562	2020	2019 5307 Operations, American Disabilities Act Service, Preventative Maintenance, Project Administration, Security System Upgrades
OR-2017-025	$63,600	2020	Fiscal Year 2016 5307 Surface Transportation Block Grant Program Bend Bus Shelters
OR-2021-035	$1,370,117	2021	Fiscal Year 2019-2020 Section 5307 - Operations, American Disabilities Act Service, Preventive Maintenance, Project Administration, Security System Upgrades
OR-2021-042	$163,220	2021	Fiscal Year 2019 Surface Transportation Block Grant Program Flex to Section 5307 - Community Connector Bus Stop Construction Enhancements
OR-2021-044	$931,183	2021	American Rescue Plan Act - Fiscal Year 2021 Section 5307 - Operating Assistance for Central Oregon Intergovernmental Council

Cascade East Transit received Supplemental Funds for operating assistance in award numbers OR-2020-020 and OR-2021-044. This is not Cascade East Transit's first time receiving operating assistance from the FTA.

Projects Completed

In the past few years, Cascade East Transit completed the following noteworthy projects:

- FY2019 Surface Transportation Block Grant (STBG) funds transfer to 5307 for Cascade East Transit Regional Transit Master Plan Update: $133,697 in Federal Highway Administration (FHWA)'s STBG funds transferred into the Section 5307 program in FY2019 (that were of FHWA's FY2014 program funds) to update to the Cascade East Transit Regional Transit Master Plan.
- FY2017 STBG flex to Section 5307 Vehicle Replacement: $354,434 in FY2017 STGB funds transferred to the 5307 Program. The project will replace approximately one 40-foot bus.

- FY2017 STBG flex to Section 5307 for Bus Replacement: $145,466 in FY2017 STBG funds, out of $145,466 available, transferred to FTA Section 5307 funds. These funds will be used towards the purchase of approximately one 40-ft heavy duty bus for the Bend fixed-route service.
- FY2010 5320 TIP Parks Buses/Equip: $30,600 in Federal FY2010 FTA Section 5320 funding (out of the $30,600 total available). Used for signal and communication equipment used on transit vehicles providing transit services to the park and transit enhancements.

Ongoing Projects

Cascade East Transit is currently implementing the following noteworthy projects:

- COIC uses its annual apportioned 5307 and CARES 5307 funds to support operations, project administration, preventative maintenance, ADA complementary paratransit and de minimis indirect costs providing public transit service to Bend, Oregon.
- FY2019 STBG flex to Section 5307 funds for Engineering, Design Community Connector Bus Stop Enhancements: $61,374 in FY2019 STBG funds transferred into the 5307 program for the engineering, design, and environmental work and related administration costs.
- FY2019 STBG flex to Section 5307 - Community Connector Bus Stop Construction Enhancements: $163,220 in FY2019 STBG flex to Section 5307 funds for the construction of approximately ten ADA accessible bus stops throughout Central Oregon. This amount is for the construction portion. This is in association to OR-2019-042, which funded the design/engineering portion.

Future Projects

Cascade East Transit plans to pursue the following noteworthy projects in the next three to five years:

- COIC plans to continue to use its annual apportioned formula Section 5307 and CARES Section 5307 funds to support operations, project administration, preventive maintenance, ADA complementary paratransit and de minimis indirect costs providing public transit service to Bend, Oregon.

IV. Results of the Review

1. Legal

Basic Requirement: The recipient must promptly notify the FTA of legal matters and additionally notify the U.S. Department of Transportation (US DOT) Office of Inspector General (OIG) of any instances relating to false claims under the False Claims Act or fraud. Recipients must comply with restrictions on lobbying requirements.

Finding: During this Triennial Review of Cascade East Transit, no deficiencies were found with the FTA requirements for Legal.

2. Financial Management and Capacity

Basic Requirement: The recipient must have financial policies and procedures; an organizational structure that defines, assigns and delegates fiduciary authority; and financial management systems in place to manage, match, and charge only allowable costs to the award. The recipient must conduct required Single Audits, as required by 2 CFR part 200, and provide financial oversight of subrecipients.

Finding: During this Triennial Review of Cascade East Transit, no deficiencies were found with the FTA requirements for Financial Management and Capacity.

3. Technical Capacity – Award Management

Basic Requirement: The recipient must report progress of projects in awards to the Federal Transit Administration (FTA) and close awards timely.

Finding: During this Triennial Review of Cascade East Transit, no deficiencies were found with the FTA requirements for Technical Capacity – Award Management.

4. Technical Capacity – Program Management & Subrecipient Oversight

Basic Requirement: States must document and follow a public involvement process for the development of the long-range statewide transportation plan and State Transportation Improvement Program (STIP). Designated recipients of Sections 5310, 5311, and 5339 funds must develop and submit a State Management/ Program Management Plan to the FTA for approval. Recipients must enter into an agreement with each subrecipient, obtain required certifications from subrecipients, report in the Federal Funding Accountability and Transparency Act Subaward Reporting System (FSRS) on subawards, and ensure subrecipients comply with the terms of the award.

Finding: During this Triennial Review of Cascade East Transit, no deficiencies were found with the FTA requirements for Technical Capacity – Program Management & Subrecipient Oversight.

5. Technical Capacity – Project Management

Basic Requirement: The recipient must be able to implement the Federal Transit Administration (FTA)-funded projects in accordance with the award application, the FTA Master Agreement, and applicable laws and regulations using sound management practices.

Finding: During this Triennial Review of Cascade East Transit, no deficiencies were found with the FTA requirements for Technical Capacity – Project Management.

6. Transit Asset Management

Basic Requirement: Recipients must comply with 49 CFR part 625 to ensure public transportation providers develop and implement transit asset management (TAM) plans.

Finding: During this Triennial Review of Cascade East Transit, no deficiencies were found with the FTA requirements for Transit Asset Management.

7. Satisfactory Continuing Control

Basic Requirement: The recipient must ensure that Federal Transit Administration (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 Cascade East Transit, no deficiencies were found with the FTA requirements for Satisfactory and Continuing Control.

8. 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.

Finding: During this Triennial Review of Cascade East Transit, no deficiencies were found with the FTA requirements for Maintenance.

9. Procurement

Basic Requirement: The non-Federal entity must use its own documented procurement procedures which reflect applicable State, local, and tribal laws and regulations, and conform to applicable Federal law and the standards identified in 2 CFR Part 200. State recipients can use the state's overall policies and procedures. When applied to Federal procurements, those policies and procedures must still be compliant with all Federal requirements as applied to non-state recipients. The flexibility afforded by 2 CFR Part 200 should not be misconstrued as

absolving a state from Federal requirements. For example, the FTA does not require each State DOT to have policies and procedures separate from the state education department.

Finding: During this Triennial Review of Cascade East Transit, no deficiencies were found with the FTA requirements for Procurement.

10. Disadvantaged Business Enterprise (DBE)

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

Finding: During this Triennial Review of Cascade East Transit, no deficiencies were found with the US DOT requirements for DBE.

11. Title VI

Basic Requirement: The recipient 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 recipient must ensure that all transit services and related benefits are distributed in an equitable manner.

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

12. Americans with Disabilities Act (ADA) – General

Basic Requirement: Titles II and III of the Americans with Disabilities Act 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 Cascade East Transit, no deficiencies were found with the US DOT requirements for ADA – General.

13. ADA – Complementary Paratransit

Basic Requirement: Under 49 CFR 37.121(a), each public entity operating a fixed-route system shall provide paratransit or other special service to individuals with disabilities that is comparable to the level of service provided to individuals without disabilities who use the fixed-route system. "Comparability" is determined by 49 CFR 37.123-37.133. Requirements for

complementary paratransit do not apply to commuter bus, commuter rail, or intercity rail systems.

Finding: During this Triennial Review of Cascade East Transit, no deficiencies were found with US DOT requirements for ADA – Complementary Paratransit.

14. Equal Employment Opportunity

Basic Requirement: The recipient 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.

Finding: During this Triennial Review of Cascade East Transit, no deficiencies were found with the FTA requirements for Equal Employment Opportunity.

15. School Bus

Basic Requirement: Recipients are prohibited from providing school bus service in competition with private school bus operators unless the service qualifies and is approved by the Federal Transit Administration (FTA) Administrator under an allowable exemption. Federally-funded equipment or facilities cannot be used to provide exclusive school bus service.

Finding: During this Triennial Review of Cascade East Transit, no deficiencies were found with the FTA requirements for School Bus.

16. Charter Bus

Basic Requirement: Recipients are prohibited from using the FTA-funded equipment and facilities to provide charter service that unfairly competes with private charter operators. Recipient may operate charter only when the service meets a specified exception defined in rule.

Finding: During this Triennial Review of Cascade East Transit, no deficiencies were found with the FTA requirements for Charter Bus.

17. Drug Free Workplace Act

Basic Requirement: Recipients are required to maintain a drug free workplace for all award-related employees; report any convictions occurring in the workplace timely; and have an ongoing drug free awareness program.

Finding: During this Triennial Review of Cascade East Transit, no deficiencies were found with the FTA requirements for Drug-Free Workplace Act.

18. Drug and Alcohol Program

Basic Requirement: Recipients 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 Cascade East Transit, no deficiencies were found with the FTA requirements for Drug and Alcohol Program.

19. Section 5307 Program Requirements

Basic Requirement: The recipient must participate in the transportation planning process in accordance with Federal Transit Administration (FTA) requirements and the metropolitan and statewide planning regulations.

Recipients shall develop, publish, afford an opportunity for a public hearing on, and submit for approval, a program of projects (POP).

Recipients 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.

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 Cascade East Transit, no deficiencies were found with the FTA requirements for Section 5307 Program Requirements.

20. Section 5310 Program Requirements

Basic Requirement: Recipients must expend Section 5310 funds on eligible projects that meet the specific needs of seniors and individuals with disabilities. Projects selected for funding must be included in a locally developed, coordinated public transit-human services transportation plan. Recipients must approve all subrecipient leases of Section 5310-funded vehicles. Leases of Section 5310-funded vehicles must include required terms and conditions. Either the recipient or subrecipient must hold title to the leased vehicles.

This section only applies to recipients that receive Section 5310 funds directly from the FTA; therefore, the related requirements are not applicable to the review of Cascade East Transit.

21. Section 5311 Program Requirements

Basic Requirement: States must expend Section 5311 funds on eligible projects to support rural public transportation services and intercity bus transportation.

This section only applies to recipients that receive Section 5311 funds directly from FTA; therefore, the related requirements are not applicable to the review of Cascade East Transit.

22. Public Transportation Agency Safety Plan (PTASP)

Basic Requirement: Recipients must comply with the Public Transportation Agency Safety Plan (PTASP) regulation (49 CFR Part 673) to ensure public transportation providers develop and implement an Agency Safety Plan (ASP).

Finding: During this Triennial Review of Cascade East Transit, no deficiencies were found with the FTA requirements for Public Transportation Agency Safety Plan Requirements.

23. Cybersecurity

Basic Requirement: Recipients that operate rail fixed guideway public transportation systems must certify compliance with the requirements for establishing a cybersecurity process under 49 U.S.C. § 5323(v), a new subsection added by the National Defense Authorization Act for Fiscal Year 2020, Pub. L. 116-92, § 7613 (Dec. 20, 2019).

This section only applies to recipients that operate rail fixed guideway public transportation systems; therefore, the related requirements are not applicable to the review of Cascade East Transit.

V. Summary of Findings

Review Area	Finding	Deficiency Code(s)	Corrective Action(s)	Response Due Date(s)	Date Closed
1. Legal	ND				
2. Financial Management and Capacity	ND				
3. Technical Capacity – Award Management	ND				
4. Technical Capacity – Program Management and Subrecipient Oversight	ND				
5. Technical Capacity – Project Management	ND				
6. Transit Asset Management	ND				
7. Satisfactory Continuing Control	ND				
8. Maintenance	ND				
9. Procurement	ND				
10. Disadvantaged Business Enterprise	ND				
11. Title VI	ND				
12. Americans with Disabilities Act (ADA) – General	ND				
13. ADA – Complementary Paratransit	ND				
14. Equal Employment Opportunity	ND				
15. School Bus	ND				
16. Charter Bus	ND				
17. Drug-Free Workplace	ND				
18. Drug and Alcohol Program	ND				
19. Section 5307 Program Requirements	ND				

Review Area	Finding	Deficiency Code(s)	Corrective Action(s)	Response Due Date(s)	Date Closed
20. Section 5310 Program Requirements	NA	This section only applies to recipients that receive Section 5310 funds directly from the FTA; therefore, the related requirements are not applicable to the review of Cascade East Transit.			
21. Section 5311 Program Requirements	NA	This section only applies to recipients that receive Section 5311 funds directly from FTA; therefore, the related requirements are not applicable to the review of Cascade East Transit.			
22. Public Transportation Agency Safety Plan	ND				
23. Cybersecurity	NA	This section only applies to recipients that operate rail fixed guideway public transportation systems; therefore, the related requirements are not applicable to the review of Cascade East Transit.			

The metrics used to evaluate whether a recipient is meeting the requirements for each of the areas reviewed are: Deficient (D)/Not Deficient (ND)/Not Applicable (NA)

VI. Attendees

Name	Title	Phone Number	E-mail Address
Central Oregon Intergovernmental Council			
Tammy Baney	Executive Director	541-504-3306	tbaney@coic.org
Andrea Breault	Transportation Director	541 699-4094	abreault@coic.org
Drew Orr	Transportation Fiscal Administrator	541-548-9525	dorr@coic.org
Michelle Williams	Fiscal Services Manager and Deputy Director	541-504-3303	michellew@coic.org
FTA			
Scot Rastelli	Transportation Program Specialist	206-220-7965	scot.rastelli@dot.gov
Jeremy Borrego	Director of Operations and Program Management	206-220-7956	jeremy.borrego@dot.gov
Christopher C. MacNeith	Region X Civil Rights Officer	206-220-4462	christopher.macneith@dot.gov
Milligan Consulting, LLC			
Kristin Tighe	Lead Reviewer	267-817-9118	ktighe@miconsult.net
Ketnah Parchment	Associate Reviewer	267-817-9113	kparchment@miconsult.net

VII. Appendices

No appendices included in this report.