



State of Utah

GARY R. HERBERT  
*Governor*

SPENCER J. COX  
*Lieutenant Governor*

DEPARTMENT OF TRANSPORTATION

CARLOS M. BRACERAS, P.E.  
*Executive Director*

SHANE M. MARSHALL, P.E.  
*Deputy Director*

January 31, 2019

Barbara Lefler and Brenda Adair  
Red Rock Center for Independence  
168 North 100 East, Suite 101  
St. George, UT 84770

Dear Barbara Lefler and Brenda Adair:

Thank you for arranging to have your vehicle available for inspection on January 23, 2019. Attached are the review documents.

- Since the last onsite visit there has been no late PM's or quarterly reports. One vehicle surveillance was late that was submitted on 5/1/2017.
- This is not a finding. A Title VI update will be needed by November 2019, which is 3 years since the inception of your Title VI plan. UDOT will provide guidance on how to make the update.

Thank you for your ongoing commitment to safe, reliable, and quality transportation in your community. If you have any questions regarding the comments listed above or the review documents, please feel free to contact myself or Raymond Earl.

Raymond Earl  
[rearl@hwlochner.com](mailto:rearl@hwlochner.com)

Tim Boschert  
[tboschert@utah.gov](mailto:tboschert@utah.gov)

Utah Department of Transportation  
Program Development  
4501 South 2700 West  
P.O. Box 143600  
Salt Lake City, UT 84114-3600

Sincerely,

Tim Boschert  
Public Transit Plans & Programs Director

cc: Raymond Earl  
PTT Online File and T-drive

## UDOT PTT ADA Compliance Review Form

Agency Name Red Rock Center for Independence Agency Rep Barbara Lefler, Brenda Adair

Review Date 01/23/2019 Reviewer Raymond Earl *Raymond Earl*

Number / Project Type (List all open grants) 138842 – Buy Small Bus (5310)

### Pre-review Meeting with Program Manager

Discussion Item	Notes
Grant types/activities/amounts	5310 funds for new vehicle procurement providing demand responsive service; capital expenses only; for a total of one contract is \$38,794 (federal share); PTT performed procurement.
Any known issues?	No known ADA issues.

### Field Review Questions

Applicability	Question	Answer/ Response/ Discussion	Verification Action	Finding
Fixed route service providers	Are new buses or rail vehicles ADA accessible?	N/A – demand response service provided.	Review buses / vehicles in the field	None
Fixed route service providers	Are used buses or rail vehicles ADA accessible?	N/A – demand response service provided and no used buses procured.	Review buses / vehicles in the field. If answer is no, review good faith documentation.	None
Fixed route service providers	Are remanufactured buses or rail vehicles ADA accessible?	N/A – demand response service provided and no remanufactured buses procured.	Review buses / vehicles in the field. If answer is no, review engineering analysis showing adverse structural effects.	None
Fixed route service providers	If the subrecipient contracts for fixed route service, including commuter bus service, how does the subrecipient know that all buses used for service are accessible?	N/A – demand response service provided.	Discuss process of verification.	None
Demand responsive service providers	Has the subrecipient purchased new vehicles that are not accessible for demand responsive service, including route deviation service? If yes:	No, vehicle is accessible.	Review buses / vehicles in the field.	None
	a) Is the subrecipient providing equivalent service as defined by 49 CFR 37.77 ( c) and 37.105?	N/A, vehicle is accessible.	Review usage statistics and service provided with subrecipient to ensure equivalent service requirements	None

Applicability	Question	Answer/ Response/ Discussion	Verification Action	Finding
			are met.	
	b) Has the subrecipient documented its analysis of equivalent service?	N/A, vehicle is accessible.	Review and get a copy of the analysis.	None
	c) Has the subrecipient submitted a certification of equivalent service to PTT?	N/A, vehicle is accessible.	Get copy of certification or check with the Program Manager.	None
Facilities	Since the last review, has the subrecipient constructed any new transit facilities? If yes, are they accessible?	No.	Review facility and take pictures of accessibility.	None
Facilities	Since the last review, has the subrecipient altered any transit facilities in any way? If yes:	No.		None
	a) Were the modifications in accordance with 49 CFR 37.9 and Subpart C to 49 CFR 37? If no:	N/A, no facilities constructed or altered.	Review modifications and take pictures.	None
	b) Has the subrecipient provided documentation sufficient to support the determination that the facility was made accessible to the maximum extent feasible or that costs of alterations required to the path of travel were disproportionate to the overall alterations in terms of cost and scope? Review	N/A, no facilities constructed or altered.	Review and get copy of documentation.	None
All vehicles / service that require ADA accessibility	What is the subrecipient's policy or procedure for the following ADA requirements:		Review written policies and verify in the field / vehicles. Interview drivers on same questions.	
	a) Stop announcements on fixed route vehicles?	Service is demand response, not fixed route.		None
	b) Means of route identification at stops served by multiple vehicles on multiple routes?	Only one vehicle serves one stop on any given day.		None
	c) Service animals on vehicles and facilities?	Service would be provided to any service animal. So far they have never encountered a service animal.		None
	d) Transporting devices	They transport all devices that		None

Applicability	Question	Answer/ Response/ Discussion	Verification Action	Finding
	meeting the definition of a "wheelchair"?	fit on the lift and that can be secured.		
	e) Drivers providing assistance with the use of accessibility equipment on the vehicle including lifts, ramps, securement systems?	Drivers do provide assistance as necessary.		None
	f) Use of wheelchair securements?	Wheelchairs must be secured.		None
	g) Provision of service when a mobility device cannot be secured?	Red Rock knows their clients before they are picked up and know their needs.		None
	h) Passengers using mobility aids transferring to a seat?	Passengers are not required to transfer.		None
	i) Use of lifts or ramps by standees?	The lift is operated for anyone who requests it.		None
	j) Signage designating priority seating for elderly persons and persons with disabilities for vehicles used in fixed route service?	Service is not fixed route.		None
	k) Requesting that persons sitting in priority seats vacate those seats when a person with a disability needs to use them?	Service is not fixed route.		None
	l) Use of accessibility related equipment and features by personnel, such as automatic enunciators, stop request buttons, etc.?	Personnel observed knew how to use the accessibility equipment. All drivers are able to operate accessibility related equipment.		None
	m) Public information / communications available in accessible formats? In what formats is information regarding transportation services available?	They have employees that sign for deaf people. Use Relay Utah also if needed.		None
	n) Lift/ramp deployment at any stop?	Yes.		None
	o) Service to persons using respirators or portable oxygen?	Yes if needed.		None
	p) Time allowed for persons with disabilities to	As much time as necessary is allowed.		None

Applicability	Question	Answer/ Response/ Discussion	Verification Action	Finding
	board/disembark a vehicle?			
All vehicles / service that require ADA accessibility	Are subrecipient personnel trained to proficiency in order to operate vehicles and equipment and assist and treat individuals with disabilities accordingly?	Staff members that are proficient at ADA features will train new drivers. Drivers are staff members or employed.	If written procedure for this, review. Discuss how the subrecipient monitors compliance to this requirement (performance evals, corrective actions, etc.)	None
All vehicles / service that require ADA accessibility	Are accessibility features maintained in operative condition?	Yes, lift was operative. Your Ricon lift meter read at 1406 cycles and should have a maintenance performed at 1800 cycles per the Braun PM plan.	Have the subrecipient demonstrate random features are operative.	None
All vehicles / service that require ADA accessibility	What system is used to ensure regular and frequent maintenance inspections of accessibility features? Is this system able to determine if accessibility features are operative?	They follow PTT's maintenance plan, which includes the lift manufacturer's maintenance schedule.	Discuss system and review documentation to ensure system is followed.	None
All vehicles / service that require ADA accessibility	What is the policy with regard to lift and ramp failures on in-service vehicles?	Discussed this with Barb and Brenda.	Review and get copy of policy. Ask operators the questions below.	
	a) Are operators required to report failures promptly?	Yes.		None
	b) Is alternative service provided to persons stranded for more than 30 minutes due to failures?	Yes, Red Rock can call other senior center or SUNTRANS or use manual pump.		None
	c) Are lifts and ramps repaired within ADA required timeframes prior to returning to service?	No down time to date.		None
	d) Are there spares available to enable subrecipients to meet timeframes?	Yes, Redrock can call other senior center or SUNTRANS or use manual pump.		None
Fixed route service providers (public agencies and	Does the subrecipient provide ADA complementary paratransit service?	N/A – demand response service provided.	Verify by reviewing paratransit vehicles / documentation.	None

Applicability	Question	Answer/ Response/ Discussion	Verification Action	Finding
all 5311)				
Fixed route service providers (public agencies and all 5311)	If commuter bus or rail service provided, how did the subrecipient determine that the commuter bus service has the characteristics specified in the ADA regulations?	N/A – demand response service provided and no commuter service provided.	Review determination.	None
Fixed route service providers (public agencies and all 5311)	Does the subrecipient operate "university" service? Does the transit operator have a formal arrangement with the institution of higher education?	N/A – demand response service provided and no university service provided.	Get copy of the arrangement.	None
Route deviation service providers	Does the subrecipient provide route deviation service as its method for demand responsive service? If yes:	Yes.	Verify the service has a method of accepting user requests (phone call, website, email, etc.) Get examples of actual requests.	None
	a) Does the service deviate for people with and without disabilities?	Yes. They provide service to elderly and individuals with disabilities. They pickup seniors or disabled to bring to activities, take to airport.	When reviewing requests, review at least one for an individual with and one for an individual without a disability.	None
	b) Is the service promoted as route deviation service?	Due to the nature of a demand response service, route deviation is inherent.	Review promotions.	None
ADA Paratransit (public agencies and all 5311)	Does the ADA complementary paratransit eligibility process of the subrecipient consider eligible, and provide service to, ADA paratransit eligible individuals according to the requirements of 49 CFR 37.123 (e):	N/A – Not required because demand response service provided, not fixed route.	Review a sample of an eligibility decision and an appeal.	None
	a) Are eligibility decisions based solely on a note from a physician? What percent of applicants are approved?	N/A – Not required because demand response service provided, not fixed route.		None
	b) Are eligibility decisions made within 21 days of receipt of a complete application? How does the subrecipient know? If no, is presumptive eligibility granted?	N/A – Not required because demand response service provided, not fixed route.		None
	c) Are persons who are denied eligibility or given	N/A – Not required because demand response service		None

Applicability	Question	Answer/ Response/ Discussion	Verification Action	Finding
	conditional or temporary eligibility given a written notice with specific reasons for the decision and notice of their right to appeal? If conditional eligibility is granted, are conditions applied to individual trips?	provided, not fixed route.		
	d) Does the appeals process adhere to the ADA regulations (opportunity to be heard, separation of functions, decision within 30 days, written notification of decision and reason for it)?	N/A – Not required because demand response service provided, not fixed route.		None
	e) If a decision is not made within 30 days of completing the appeals process, is transportation provided until and unless a decision to deny the appeal is issued?	N/A – Not required because demand response service provided, not fixed route.		None
ADA Paratransit (public agencies and all 5311)	Does the ADA complementary paratransit service provided by the subrecipient meet the following regulatory requirements:	N/A – Not required because demand response service provided, not fixed route.	For all below, review information provided to the public, schedules, fare schedules, programs, review usage records to compare to fixed route service.	None
	a) Is service provided to an ADA eligible individual? A personal care attendant? A companion? Additional companions based on space?	N/A – Not required because demand response service provided, not fixed route.		None
	b) Are personal care attendants (PCAs) charged a fare? Are companions charged a fare?	N/A – Not required because demand response service provided, not fixed route.		None
	c) Are visitors who present documentation that they are eligible in the jurisdiction in which they reside, present documentation of	N/A – Not required because demand response service provided, not fixed route.		None

Applicability	Question	Answer/ Response/ Discussion	Verification Action	Finding
	eligibility or certify eligibility treated as eligible?			
	d) Is next day service provided? If yes, what percent of reservations are made for the next day?	N/A – Not required because demand response service provided, not fixed route.		None
	e) Are requests for reservations accepted during normal business hours on all days prior to days of service (e.g. weekends, holidays) even if the administrative office is closed? How are reservations accepted when the administrative office is closed?	N/A – Not required because demand response service provided, not fixed route.		None
	f) Are trips negotiated with the rider and scheduled within one hour of the requested trip time?	N/A – Not required because demand response service provided, not fixed route.		None
	g) Are there any priorities based on trip purposes?	N/A – Not required because demand response service provided, not fixed route.		None
	h) Is any subscription service provided? If so, what percent of trips? Is non-subscription capacity available?	N/A – Not required because demand response service provided, not fixed route.		None
	i) Is the base mode of service door to door or curb to curb? If curb to curb is the base mode of service, is door to door service provided when necessary to achieve origin to destination service?	N/A – Not required because demand response service provided, not fixed route.		None
	j) Is ADA complementary paratransit service available during the same hours and days as fixed route service?	N/A – Not required because demand response service provided, not fixed route.		None
	k) Is service provided within 3/4 mile radius of fixed routes and rail stations and within the core area? If service is provided	N/A – Not required because demand response service provided, not fixed route.		None



Applicability	Question	Answer/ Response/ Discussion	Verification Action	Finding
	beyond the 3/4 mile radius and core areas, please describe.			
	l) Are fares no more than twice the non-discounted fixed route fare for a comparable fixed route trip?	N/A – Not required because demand response service provided, not fixed route.		None
ADA Paratransit (public agencies and all 5311)	What is the telephone hold time standard? How is telephone access measured?	N/A – Not required because demand response service provided, not fixed route.	Discuss monitoring/measuring methods	None
ADA Paratransit (public agencies and all 5311)	What is the denial rate (overall and for next day trips)?	N/A – Not required because demand response service provided, not fixed route.	Review data if available and/or discuss tracking method.	None
ADA Paratransit (public agencies and all 5311)	Are rides that are not provided in a one hour window tracked as denials?	N/A – Not required because demand response service provided, not fixed route.	Discuss tracking methods.	None
ADA Paratransit (public agencies and all 5311)	When one leg of a round trip cannot be reserved, how many denials are tracked when the rider declines the round trip?	N/A – Not required because demand response service provided, not fixed route.		None
ADA Paratransit (public agencies and all 5311)	Are restrictions placed on the number of trips? Are waiting lists used for non-subscription trips?	N/A – Not required because demand response service provided, not fixed route.	Review waiting lists and compare to subscription list.	None
ADA Paratransit (public agencies and all 5311)	What is the on-time performance rate?	N/A – Not required because demand response service provided, not fixed route.		None
ADA Paratransit (public agencies and all 5311)	Is a no-show policy used by the subrecipient? If yes:	N/A – Not required because demand response service provided, not fixed route.		None
	a) What is the suspension policy for no-shows?	N/A – Not required because demand response service provided, not fixed route.	Discuss policy.	None
	b) How does the subrecipient determine whether or not no-shows are under the rider's	N/A – Not required because demand response service provided, not fixed route.		None

Applicability	Question	Answer/ Response/ Discussion	Verification Action	Finding
	control?			
	c) Are no-shows caused by operator error counted against the rider?	N/A – Not required because demand response service provided, not fixed route.		None
	d) What are the thresholds for a cancellation before it is considered a no-show?	N/A – Not required because demand response service provided, not fixed route.	Verify thresholds established.	None
	e) Are only riders who have demonstrated a true pattern or practice of no-shows suspended?	N/A – Not required because demand response service provided, not fixed route.	Review suspensions to verify a true pattern or practice demonstrated.	None
	f) Are financial penalties assessed for no-shows?	N/A – Not required because demand response service provided, not fixed route.	Review suspensions for penalties.	None
	g) How are riders allowed to contest no-shows?	N/A – Not required because demand response service provided, not fixed route.	Review/get copy of process to verify riders can contest.	None
	h) Is there an appeals process for suspensions?	N/A – Not required because demand response service provided, not fixed route.	Review/get copy of process to verify one exists.	None
	i) Is the length of the suspension reasonable?	N/A – Not required because demand response service provided, not fixed route.	Review some random suspensions and compare to each other and policy.	None
All	Does the subrecipient have a policy and procedure for responding to and tracking complaints? Who handles complaints?	Red Rock has never had an ADA complaint to date but they have a form to fill out if there ever is one.	Review policy/procedure.	None
All	Has the subrecipient received any complaints of discrimination due to disability? What is the status of the complaint(s)?	Not that they knew of. UDOT is not aware of any either.	Review logs/tracking mechanism discussed in procedure.	None
All	Are there any lawsuits alleging discrimination on the basis of disability? If so, identify parties to the suites and issues.	Not that they knew of. UDOT is not aware of any either.	Review logs/tracking mechanism discussed in procedure.	None

**Pre or Post-Review Actions/Questions**

Applicability	Question	Answer/ Response/ Discussion	Verification Action	Finding
All vehicles / service that require ADA accessibility	How are ADA service provision requirements communicated to employees, contractors, and lessees?	Brenda trains employees on requirements. They have no third party contractors or lessees. I told them about URSTA and how URSTA is a good resource to train and increase driving skills of drivers.	Review driver handbooks, manuals, bulletins.	None

Applicability	Question	Answer/ Response/ Discussion	Verification Action	Finding
ADA Paratransit (public agencies and all 5311)	At peak times, can a caller reach the reservation office? Do callers ever receive busy signals? How does the subrecipient know?	N/A – Not required because demand response service provided, not fixed route.	Try calling reservation office several times in one day. If subrecipient has tracking system, review data.	None

**Post-review Follow-up with Program Manager**

Discussion Item	Notes
Discuss any potential issues or areas of deficiency with the Program Manager	No potential issues.

## UDOT PTT Charter and School Bus Compliance Review Form

Agency Name Red Rock Center for Independence Agency Rep Barbara Lefler, Brenda Adair

Review Date 01/23/2019 Reviewer Raymond Earl *Raymond Earl*

Number / Project Type (List all open grants) 138842 – Buy Small Bus (5310)

### Pre-review Meeting with Program Manager

Discussion Item	Notes
Grant types/activities/amounts	5310 funds for new vehicle procurement providing demand responsive service; capital expenses only; for a total of one contract is \$38,794 (federal share); PTT performed procurement.
Any known issues?	No known charter and school bus issues.
Did PTT review procurement documentation to ensure PTT's restrictions on charter and school bus service were included?	PTT performed procurement. School bus restrictions included in contract between PTT and agency; charter restrictions included in State Management Plan. Note that the charter clause has been added to all future contracts. Since PTT performed the procurement, there was no documentation to review.

### Field Review Questions

Applicability	Question	Answer/ Response/ Discussion	Verification Action	Finding
All	Does the subrecipient or their third party contractors operate charter or school bus services (or tripper service)?	No.	Ask if they have provided exclusive, irregular service to a location not on usual route for specific events or functions. Ask drivers / operators if they have done charter or school service. Review usage logs / reports for irregular usage.	None
All	Do the subrecipient's third party contracts include PTT's restrictions on charter and school bus service?	No third party contracts.	Review and get copy of third party contracts.	None
Maintenance	If no operating or capital provided but maintenance is, does the subrecipient perform maintenance on charter or school bus services? If yes, can they readily separate those costs?	Only capital funds.		None

### Post-review Follow-up with Program Manager

Discussion Item	Notes
Discuss any potential issues or areas of deficiency with the Program Manager	No potential issues identified.

## UDOT PTT Continuing Control Compliance Review Form

Agency Name Red Rock Center for Independence Agency Rep Barbara Lefler, Brenda Adair

Review Date 01/23/2019 Reviewer Raymond Earl *Raymond Earl*

Number / Project Type (List all open grants) 138842 – Buy Small Bus (5310)

**Pre-review Meeting with Program Manager**

Discussion Item	Notes
Grant types/activities/amounts	5310 funds for new vehicle procurement providing demand responsive service; capital expenses only; for a total of one contract is \$38,794 (federal share); PTT performed procurement.
Any known issues, i.e. improper equipment use or disposal that requires specific review?	No know issues.
Review real property and equipment approved / intended uses.	Approved / intended use is demand response service for the elderly and individuals with disability in Washington County and metropolitan St. George area. No real property.
Has any real property or equipment been removed from the approved / intended use or put to additional or substitute uses?	According to PTT records, a total of 2 vehicles have been funded through PTT for this agency. One currently has useful life remaining and is still being used for approved use.
Has any real property or equipment been disposed of? Identify which items met useful life and the market value for all items at time of disposition. Review records to verify PTT reimbursed when required.	No vehicles have been disposed of.

**Field Review Questions**

Applicability	Question	Answer/ Response/ Discussion	Verification Action	Finding
Real Property and Equipment	Verify all real property and equipment is covered by adequate insurance.	Vehicle is covered by insurance.	Get copies of, take pictures of, or document insurance certificates, etc. for all property and equipment.	None
Equipment (All sections)	What is the subrecipients control system to prevent loss, damage, or theft of property? Is a system in place to investigate and document loss, damage, or theft to property?	Keep locked at night and keep parked backwards. They have an incident report and will call St. George police if stolen. Police station is right above where the bus is parked.	Discuss system and get copy of system / procedures if in writing. Get copy of recent investigation and documentation, if any have occurred.	None
Equipment (All sections)	Where is the equipment kept when not in use?	At the senior center and it is always locked.		None
Equipment (All sections)	Has the subrecipient leased any FTA funded equipment to private operators? Was prior PTT/FTA approval received? Has the subrecipient leased	No.	Review lease to verify it contains provisions for serving the best interest of the public, maintaining property at	None

Applicability	Question	Answer/ Response/ Discussion	Verification Action	Finding
	any FTA funded equipment to other public entities or nonprofit organizations?		a high level of cleanliness, safety, and mechanical soundness, cross reference to service agreement, and no subleasing without approval. Get copy of prior approval documentation.	
Equipment (All sections)	Has the subrecipient removed equipment with remaining useful life from project use or applied it to a different use? If yes, was proper notification given to PTT?	No.	Compare answers to Program Managers known uses / variances and review all equipment shown in PTT in the field to document observed uses.	None
Equipment (All sections)	Has the subrecipient disposed of any equipment or supplies during the past three years and PTT notified and reimbursed?	They do not have any FTA funded equipment and RRCI knows that all proceeds from equipment sales should go back to transportation budget / fund.	Compare answers to Program Managers / PTT Online list. Verify equipment shown in their inventory and PTT Online is still in agency's possession and being used by field inspection (select random equipment).	None
Equipment (All sections)	Has the subrecipient received any insurance proceeds? If yes, were they applied to the cost of replacing damaged or destroyed property or returned to PTT?	No insurance proceeds to date. RRCI is aware that any insurance proceeds from damaged or destroyed property must go towards repairing or replacing the property or the proceeds must be given to PTT. Any small items are taken care by cash. \$1000 deductible.	Select one instance and review documentation of costs versus insurance proceeds.	None
Equipment (All sections)	How does the subrecipient collect and manage vehicle usage data (ridership, operating costs, miles, destinations, hours)?	A binder is kept in the vehicle with daily usage information completed by the driver and it is entered in PTT online.	Review techniques and compare records to usage in PTT Online.	None
Equipment (All sections)	Who does the subrecipient provide transportation for?	The elderly and individuals with disability in Washington County and metropolitan St. George area.		None
Equipment (All sections)	Review usage with subrecipient. Have there been "cobweb" reports?	No cobweb reports of any concern. Vehicle usage has been frequent.	Review PTT Online and tracking spreadsheet for "cobweb" alerts.	None

#### Pre or Post-Review Actions/Questions

Applicability	Question	Answer/ Response/ Discussion	Verification Action	Finding
Equipment (All sections)	Does the subrecipient have equipment records/inventory	Yes. The PTT Online inventory is up to date.	Get a copy of entire inventory. Compare to	None

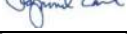
Applicability	Question	Answer/ Response/ Discussion	Verification Action	Finding
	that provide description, I.D. number, acquisition date, cost, Federal percentage, grant number, location, use and condition, disposition action, vested title, useful life?		PTT Online information.	

**Post-review Follow-up with Program Manager**

Discussion Item	Notes
Discuss any potential issues or areas of deficiency with the Program Manager	No potential issues.

## UDOT PTT Maintenance Compliance Review Form

Agency Name Red Rock Center for Independence Agency Rep Barbara Lefler, Brenda Adair

Review Date 01/23/2019 Reviewer Raymond Earl 

Number / Project Type (List all open grants) 138842 – Buy Small Bus (5310)

### Pre-review Meeting with Program Manager

Discussion Item	Notes
Grant types/activities/amounts	5310 funds for new vehicle procurement providing demand responsive service; capital expenses only; for a total of one contract is \$38,794 (federal share); PTT performed procurement.
Any known issues, i.e. missing or late vehicle surveillance inspections or preventive maintenance?	Since the last onsite visit there has been no late PM's or quarterly reports. One vehicle surveillance was late that was submitted on 5/1/2017.
Review surveillance inspections and preventive maintenance reports for each agency vehicle.	Reporting has been timely except one late vehicle surveillance.

### Field Review Questions

Applicability	Question	Answer/ Response/ Discussion	Verification Action	Finding
Vehicles (All sections)	Are preventive maintenance checklists and intervals in plan consistent with manufacturer's requirements?	Yes, they use PTT's maintenance plan.	Compare intervals in plan/checklist to manufacturer's requirements. Compare to intervals shown in PTT Online.	None
Vehicles (All sections)	How does subrecipient keep checklists and maximum intervals updated as their fleet changes?	They use PTT's plan and PTT updates the plan.		None
Facilities and Equipment Maintenance (All sections)	Do the maintenance requirements in the plan meet the manufacturer's minimum maintenance requirements for equipment under warranty?	Yes.	Select random facilities/equipment and compare plan requirements to warranty requirements. Make sure unit of measure consistent.	None
All	Is maintenance completed on time and according to plan?	No late PMs	Select some vehicles, facility features, or equipment and compare maintenance records to plan and PTT Online. Go back at least 12 months.	None
Facilities and Equipment	Are facility ADA features maintained according to	The Ricon lift was at 1406 cycles and isn't due for a maintenance	Review records to see if ADA features are	None



Applicability	Question	Answer/ Response/ Discussion	Verification Action	Finding
Maintenance (All sections)	plan requirements?	until 1800 cycles.	maintained and operating and compare frequency to plan/manufacture's requirements. Can also interview personnel responsible for maintaining ADA features.	
Vehicles (All sections)	Are pre-trip inspections current for previous three months?	Yes.	Get copies of inspections and compare to PTT Online usage dates.	None
Vehicles (All sections)	Are vehicle surveillance inspections completed and accurate?	Yes	Complete vehicle surveillance inspection on site with subrecipient and compare to last inspection submitted in PTT Online.	None

#### Pre or Post-Review Actions/Questions

Applicability	Question	Answer/ Response/ Discussion	Verification Action	Finding
Vehicles (All sections)	Does the subrecipient have a written maintenance plan? Does it address ADA features?	Yes, they use PTT's plan and it does address ADA features.	Get a copy of the most current plan.	None
Facilities and Equipment Maintenance (All sections)	Does the maintenance plan include FTA funded facilities and equipment?	No facilities included because no facilities funded. It does include all funded equipment.	Get a copy of the most current plan and note specific facilities/equipment pieces to review in the field.	None
	a) Does the plan outline a record keeping system for facility and equipment maintenance? What is it?	N-A		None
	b) Does the maintenance plan for facilities and equipment address ADA features?	N-A		None.
Warranty (All sections)	Does the subrecipient have equipment under warranty? If so, does the subrecipient have a warranty recovery plan and does it include a system for identifying warranty claims, recording	Most warranties are expired for this vehicle due to its age.	Get a copy of the recovery plan. Get copies of recent claims and compare claims submitted to claims settled.	None

Applicability	Question	Answer/ Response/ Discussion	Verification Action	Finding
	claims, and enforcing claims against the manufacturer?			

**Post-review Follow-up with Program Manager**

Discussion Item	Notes
Discuss any potential issues or areas of deficiency with the Program Manager	No potential issues.





### VEHICLE SURVEILLANCE INSPECTION

DATE: 1/23/2019

TRANSPORTATION PROVIDER NAME: RRCI (Red Rock Center For Independence)

Make <u>Ford</u>	Vehicle Year <u>2013</u>	V.I.N. (last 4 digits) <u>9382</u>	Plate Number <u>AF27B</u>	Odometer <u>22,489</u>
Documents kept in vehicle (please check if present) *Registration <input checked="" type="checkbox"/> *Insurance Card <input checked="" type="checkbox"/> *DMV Inspection Sticker <input type="checkbox"/>				

All items must be inspected. If an item is not applicable to this vehicle, place "N/A" in the adjacent box.  
Check "✓" appropriate box P = Pass F = Fail # = number of days to correct failure

EXTERIOR	P	F	#	SAFETY EQUIPMENT	P	F	#	INTERIOR	P	F	#
Body damage	✓		-	Triangles (3)	✓		1	Mirrors	✓		2
Windows	✓		2	First Aid Kit	✓		2	Lights	✓		3
*2 Outside Mirrors	✓		0	Blood Borne Pathogen Kit	✓		3	Horn	✓		2
Reflector/marker/clearance	✓		2	Seat Belt Cutter	✓		5	Seats	✓		2
*Turn Signals	✓		0	Fire Extinguisher	✓		2	*Seat Belts	✓		0
*Four Way Flashers	✓		0	Rear Door Buzzer	✓		3	AC/Heat/Defroster	✓		2
*Tires front 4/32 rear 2/32	✓		0	Exit Windows/Buzzers	✓		3	*Wipers	✓		0
*Headlights high and low	✓		0	Roof Hatch	✓		3	Gauges and Indicators	✓		2
*Parking lights	✓		0					*Brakes (Foot/Parking)	✓		0
*Brake lights	✓		0					Cleanliness	✓		2
Cleanliness	✓		2								

SIGNAGE	P	F	#	LIFT	P	F	#	SECUREMENTS	P	F	#
Buckle Up (or equivalent)	✓		5	*Interlocks	✓		0	*Belt (4 or 8 floor)	✓		0
Emergency Exits	✓		3	Level Platform	✓		3	*Lap Belt	✓		0
Lift Operating Instructions	✓		5	Lift Light	✓		1	*Shoulder Belt	✓		0
Vehicle Height	✓		5	*Electric Wires (cut, frayed)	✓		0				
Title VI Poster	✓			*Hand Pump	✓		0				
LEP Information Available	✓			Hand Rails on Lift (2)	✓		1				
				Lift Cycle Counter Value = <u>1478</u> Ricon							

Comments and Observations of Inspector:

Items that are **\*bolded** may be placed out of service for failing inspection. The vehicle may not be returned to service until defect is repaired and the Agency Administrator is notified of the repairs. Body damage depending on severity should be repaired as soon as possible.

Agency Administrator:

Name: Brenda Adair  
 Signature: Brenda Adair

Inspector:

Name: Raymond Earl  
 Signature: Raymond Earl

This document can be completed by agency personnel and is a tool for you to monitor the maintenance source you are using. Inspections are to be performed on April 1 and October 1 and the completed inspection entered into PTT Online at: <https://www.udot.utah.gov/public/ptt/f?p=131:101:1166169282072515>

## UDOT PTT Title VI and EEO Compliance Review Form

Agency Name Red Rock Center for Independence Agency Rep Barbara Lefler, Brenda Adair

Review Date 01/23/2019 Reviewer Raymond Earl *Raymond Earl*

Number / Project Type (List all open grants) 138842 – Buy Small Bus (5310)

**Pre-review Meeting with Program Manager**

Discussion Item	Notes
Grant types/activities/amounts	5310 funds for new vehicle procurement providing demand responsive service; capital expenses only; for a total of one contract is \$38,794 (federal share); PTT performed procurement.
Any known issues, i.e. complaints, missing Title VI information, etc.?	No known issues.
Does the subrecipient meet the minimum thresholds for EEO requirements? If yes, do we have an EEO plan from them? Has civil rights reviewed the plan?	<i>\$1,000,000 in capital or operating or \$250,000 in planning and over 50 transit-related employees; all construction over \$10,000 requires EEO compliance: No.</i>

**Field Review Questions**

Applicability	Question	Answer/ Response/ Discussion	Verification Action	Finding
All	How does the subrecipient notify the public of its right under Title VI?	Updated posters in bus and in center and on website.	Review actual notifications in the field (vehicles and facilities). Take pictures of notifications.	None
All	Is the notification in an open area available to the public 24 hours / day and in all vehicles?	Yes		None
All	Does the notification include a statement that the subrecipient operates without regard to race, color, and national origin?	Yes		None
All	Does the notification include a procedure the public should follow to request information on the subrecipient's Title VI obligations?	Yes		None
All	Does the notification include the complaint procedure and where complaint forms are available?	Yes		None
All	Does the subrecipient identify, investigate, and track Title VI complaints? Does the	Yes, they will but have had no Title VI complaints to date.	Discuss process and review method of	None

Applicability	Question	Answer/ Response/ Discussion	Verification Action	Finding
	procedure include a mechanism to distinguish and track Title VI complaints versus other complaints?		tracking, i.e. logs, database, etc.	
All	What steps does the subrecipient take to ensure meaningful access to the program is provided for LEP individuals?	Red Rock Center for Independence has completed the 4-factor analysis as part of their recently approved updated Title VI plan. LEP cards are in the bus and they have trained staff to assist individuals with limited English speaking skills.	Review steps / methods in field to verify the steps discussed.	None

### Pre or Post-Review Actions/Questions

Applicability	Question	Answer/ Response/ Discussion	Verification Action	Finding
All	Has the subrecipient analyzed how the four factors in the DOT LEP guidance apply to their program and activities? Four factors are:	I speak cards on bus.	Review four-factor analysis documentation. Verify it covers four factors noted below.	None
All	Review the status of current pending complaints to ensure procedures are being followed.	No complaints are currently known about. UDOT is not aware of any either.	Get copy and review pending complaints and compare to the compliant procedure. Also make sure the PTT was notified of these complaints.	None

### Post-review Follow-up with Program Manager

Discussion Item	Notes
Discuss any potential issues or areas of deficiency with the Program Manager	No potential issues. A Title VI update will be needed by November 2019, which is 3 years since the inception of your Title VI plan. UDOT will provide guidance on how to make the update.



State of Utah

GARY R. HERBERT  
*Governor*

SPENCER J. COX  
*Lieutenant Governor*

## DEPARTMENT OF TRANSPORTATION

CARLOS M. BRACERAS, P.E.  
*Executive Director*

SHANE M. MARSHALL, P.E.  
*Deputy Director*

January 9, 2019

Barbara Lefler and Brenda Adair  
Red Rock Center for Independence  
16B North 100 East, Suite 101  
St. George, UT 84770

Dear Barbara Lefler and Brenda Adair:

An onsite review of your Utah / FTA program will be performed by the UDOT Public Transit Team and has been scheduled for Wednesday, January 23rd, 2019 at 3:00 PM. We will plan on meeting at the address shown above. The following is a list of review topics:

- 1) Your current vehicle funded through FTA programs will be inspected.
- 2) Vehicle registration and insurance records for your vehicle will be reviewed. Please have these records available during the review.
- 3) Pre-trip inspection records for the past three months will be examined.
- 4) Records of preventive maintenance will be reviewed. Please have maintenance records for the last two preventative services during the review.
- 5) Program compliance with Title VI requirements will be reviewed.

The review should not take more than one and a half hours. To complete the review the UDOT staff will ask questions, present findings, and offer technical assistance. We recommend that the person legally responsible for your contract with UDOT and the person in charge of the vehicles be in attendance at this review. If a driver is available, one is encouraged to attend. We also request your cooperation in conducting this review in an uninterrupted environment, if possible. Should you have any questions regarding this appointment or schedule, please call Raymond Earl at 3B5-209-3776.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Boschert".

Tim Boschert  
Public Transit Plans & Programs Director

TB/ml

cc: Raymond Earl  
PTT Online File and T-drive