



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

REGION IX  
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American Samoa,  
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July 14, 2022

Rick Jennings II  
Board Chair & Council Member  
Sacramento Area Council of Governments  
1415 L St, Ste 300  
Sacramento, CA 95814

Re: FY 2022 Triennial Review – Final Report

Dear Mr. Jennings:

I am pleased to provide you with a copy of this Federal Transit Administration (FTA) report as required by 49 U.S.C. Chapter 53 and other federal requirements. The enclosed final report documents the FTA's Fiscal Year (FY) 2022 Triennial Review of the Sacramento Area Council of Governments (SACOG), in Sacramento, California. Although not an audit, the Triennial Review is the FTA's assessment of the SACOG'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 the SACOG's compliance with the administrative relief and flexibilities the FTA granted and the requirements of the [COVID-19 Relief](#) funds received through the Coronavirus Aid, Relief, and Economic Security Act; Coronavirus Response and Relief Supplemental Appropriations Act of 2021; and American Rescue Plan Act of 2021.

The Triennial Review focused on the SACOG's compliance in 23 areas. Deficiencies were found in three (3) areas: (i) Legal, (ii) Procurement, and (iii) Americans with Disabilities Act – General. Four (4) areas were not applicable. The SACOG had no repeat deficiencies from the FY 2018 Triennial Review.

## Regulations and Guidance

As the SACOG moves forward with its transit program, the FTA would like to provide a look-ahead for future oversight activities related to new and/or updated requirements, below.

### 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 a recipient that operates a rail fixed guideway public transportation system to certify to the 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 FY 2022 review cycle, the FTA is deploying a “soft launch” in determining, if and how, recipients are developing their plan for identifying and reducing cybersecurity risks. Recipients are to certify in TrAMS by correctly completing Category 20 of the Annual Certifications and Assurances to indicate their compliance with this requirement. For the FY 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 the assigned FTA oversight Transportation Program Specialist, Amitra Mamdouhi at 415-734-9453 or by email at [amitra.mamdouhi@dot.gov](mailto:amitra.mamdouhi@dot.gov).

Sincerely,

DARIN J  
ALLAN

Digitally signed by DARIN  
J ALLAN  
Date: 2022.07.14  
09:33:03 -07'00'

For Ray Tellis  
Regional Administrator

Enclosure