



Moving Public Transportation
Into the Future

Maryland Transit Association: Financial Management Training

November 10, 2022

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Session Content



Recent Impactful Events



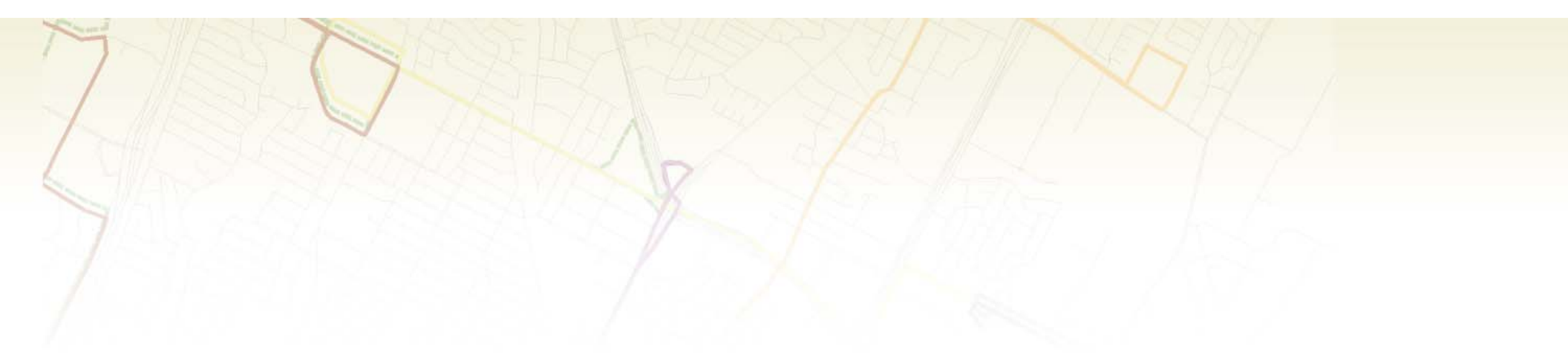
Pandemic Relief Funding



Hot Topics in Financial Management



Other Trending Topics



Module 1

RECENT EVENTS

Recent Impactful Events

- ◆ New Laws and Regulations
 - National Defense Authorization Act (NDAA), Pub. L. 113-291, Never Contract with the Enemy
 - 2 CFR § 183
 - 2 CFR § 200.215
 - National Defense Authorization Act (NDAA), Pub. L. 115-232, Prohibition on Certain Telecommunication and Video Surveillance Services or Equipment
 - Revisions to 2 CFR § 200



Recent Impactful Events

- ◆ New Laws and Regulations
 - Coronavirus Aid, Relief, and Economic Security (CARES) Act
 - Coronavirus Response and Relief Supplemental Appropriations Act, 2021 (CRRSAA)
 - American Rescue Plan Act (ARP)
 - Bipartisan Infrastructure Law (BIL), as enacted in the Infrastructure Investment and Jobs Act (IIJA)

Recent Impactful Events

- ◆ Revisions to 2 CFR § 200 Effective 2014
 - Set Government-Wide Standards
 - \$3,500 Micro-Purchase Threshold
 - \$150,000 Small Acquisition Threshold
- ◆ Congress Revised These Standards
 - Effective with OMB-18-18, June 20, 2018
 - \$10,000 Micro-Purchase Threshold
 - \$250,000 Small Acquisition Threshold



Recent Impactful Events

- ◆ NFE Establishment of Higher Micro-Purchase Threshold
 - 2 CFR § 200.320(a)(iv) Provides an Option to Any Non-Federal Entity That Enables the Organization to Establish a Threshold Higher Than the Micro-Purchase Threshold Identified in the Federal Acquisition Regulation (FAR)
 - The Entity May Adopt A Threshold Of Up To \$50,000, But There Are Conditions

Recent Impactful Events

◆ Conditions

- Annual Self-Certification
- Justification for the Higher Threshold Must be Made
- Entity Must be a “Low Risk” Auditee in Most Recent Single Audit
- Must Conduct Annual Risk Assessment Process
- If a Public Entity, Higher Threshold Must be Consistent with Prevailing State Laws



Recent Impactful Events

- ◆ Changes to 2 CFR § 200 Now Allow Any Non-Federal Entity to Use the *de minimis* Rate Even If the Entity Had Previously Negotiated an Indirect Cost Rate with the Federal Government

Recent Impactful Events

- ◆ Changes to 2 CFR § 200 Clarify that a Recipient is Only Response for Oversight of a Subrecipient's Audit Findings that Relate to the Funding Source Passed Through to the Subrecipient, Not All Audit Findings

Recent Impactful Events

- ◆ Never Contract with the Enemy Act
 - 2 CFR § 183
 - Applies Only to Grants Performed Outside the U.S.
 - Some Burden to Check SAM.gov to Ensure Your Agency Does Not Do Business with an Entity That Has Been Debarred Due to Violations of this Act

Recent Impactful Events

- ◆ Certain Telecommunications and Video Surveillance Services or Equipment
 - 2 CFR § 200.216
 - The NFE Cannot Procure, Obtain, Extend or Renew a Contract to Procure or Obtain
 - Equipment
 - Services
 - Systems
 - From
 - Huawei Technologies
 - ZTE Corporation



Recent Impactful Events

- ◆ Revisions to 2 CFR § 200.320 Defining Procurement Methods
 - Informal Procurement Methods
 - Micro-Purchases
 - Small Purchases
 - Formal Procurement Methods
 - Sealed Bids
 - Proposals
 - Noncompetitive Procurement

Recent Impactful Events

- ◆ New Provisions Under 49 U.S.C. § 5339
 - Applicants Must Use “Innovative Procurement Tools”
 - If Under Five (5) Buses in a Stand-Alone Procurement, FTA Will Now Require Written Justification for Not Using an Authorized Procurement Tool
 - Examples
 - » Cooperative Procurements
 - » State Cooperative Purchasing Contracts
 - » Innovative Leasing Arrangements



Recent Impactful Events

- ◆ BABA
 - New Requirements
 - Effective November 10, 2022
 - Adds Buy America Requirements to Construction Materials Used in FTA-Funded Projects
 - FTA Also Requesting Comments on Two Possible Relief Items



Recent Impactful Events

◆ Buy America Waiver

- Non-Availability Public Interest Waiver for Unmodified Vans and Minivans
- Caution
 - Waiver is Not Total
 - Only Applies to Non-Accessible Vehicles that Meet the Definition of “Vanpool”
 - Waiver Applies Only to Domestic Content, Final Assembly Must Occur in the U.S.
 - Engines/Motors Must be U.S.-Manufactured
 - October 25, 2022 – Two Years



Recent Impactful Events

- ◆ Useful Life Rebuild Flexibility
 - Dear Colleague Letter, November 2, 2022, Changing Extended Useful Life on Medium Size, Light-Duty Transit Buses (“Cutaways”) Rebuilds
 - Applies to Vehicles With a Minimum Useful Life of Five Years (or 150,000 Miles)
 - Rebuilds Require Useful Life Extension of Four Years
 - Now, the Extended Useful Life is Reduced to Two Years or 50,000

Recent Impactful Events

- ◆ New Rules on the Treatment of Disposition Proceeds
 - For Vehicles That Have Exceeded Useful Life
 - Subrecipient is Entitled to Keep First \$5,000 in Proceeds
 - Over \$5,000, an Amount Equal to the Federal Rate of Participation Times the Amount Over \$5,000 Must be Returned to FTA using the pay.gov Web Portal
 - The Subrecipient May Retain the Local Share of the Amount Over \$5,000



Module 2

PANDEMIC RELIEF FUNDING



Pandemic Relief

- ◆ Three Key Legislative Acts
 - Coronavirus Aid, Relief, and Economic Security (CARES) Act
 - Coronavirus Response and Relief Supplemental Appropriations Act, 2021 (CRRSAA)
 - American Rescue Plan Act (ARP)



CARES Act

- ◆ CARES Act is NOT a Program
 - A Legislative Act that Provided Additional Funding to Two FTA Programs
 - Section 5307
 - Section 5311
 - \$25 Billion
 - All Regulatory Provisions Applicable to These Programs Apply
 - Some Administrative Flexibilities

CARES Act

◆ Primary Changes

- Both Capital and Operating Expenses Were Funded at 100% Federal Share
 - 100% Share Applied to Expenses Incurred On or After January 20, 2020
 - FTA Made Clear Certain Non-Traditional Expenses Were Eligible
 - Large UZAs Permitted to Use CARES Act funds for Operations

CARES Act

- ◆ FTA Made Clear Certain Non-Traditional Expenses Were Eligible
 - Personal Protective Equipment and Cleaning Supplies
 - Administrative Leave
 - Reductions in Service
 - Leave for a Quarantined Worker
 - Leave for an Employee to Receive the COVID-19 Vaccine and Subsequent Recovery

CRRSAA

- ◆ Provided Additional Funding for Pandemic Relief
 - Funding Provided to Section 5310 in Addition to Sections 5307 and 5311
 - \$14 Billion
 - Similar Eligibility, But Priority on Payroll and Operations Expenses
 - Other Expenses Required Certification that No Employees Were Furloughed



CRRSAA

- ◆ Combined CARES/CRRSAA Apportionments Cannot Exceed a Set Percent of Reported 2018 NTD Operating Expenses
 - Section 5307 – 75%
 - Section 5311 – 125%
- ◆ May Result in Some Areas/States Not Receiving CRRSAA Funding
- ◆ Section 5311(f) Set-Aside Not Applicable
 - ICB Expenses Eligible



CRRSAA

◆ CRRSAA and Section 5310

- Apportionment

- Large UZA – 60%
- Governor’s Apportionment (Small UZAs and Rural)

- Traditional Projects

- The 55% Percent Rule for “Traditional” Projects Does Not Apply

- Planning Requirement Applied

- Must be Consistent with Coordinated HSA/Public Transit Plan

CARES/CRRSAA

- ◆ Elements Common in Both Acts
 - 100% Federal Share
 - Pre-Award Authority Back to January 20, 2022
 - No Lapse Date
 - Funds Available Until Expended
 - Recipients are Encouraged to Use Funds Expeditiously for Operating and Payroll Expenses
 - No Caps on Operating Expenses

CARES/CRRSAA

- ◆ Elements Common in Both Acts
 - Other Administrative Flexibilities
 - No Caps on Percent of Funds That Can be Used for ADA Complementary Paratransit
 - Recipients/Subrecipients Cannot Use Funds to Pay Third Party Contract Operators for Services Not Provided



CARES/CRRSAA

- ◆ Elements Common in Both Acts
 - Other Administrative Flexibilities
 - Allocation/Distribution Plans in a State Management Plan (SMP) or Program Management Plan (PMP) Need Not be Followed
 - Requirement
 - One Percent Requirement for Section 5307 Projects for Security Remains
 - No RTAP Funding in Section 5311



CARES/CRRSAA

- ◆ Elements Common in Both Acts
 - TIP/STIP
 - Operating Expenses Do Not Require a TIP or STIP Amendment
 - Capital Projects that Entail Substantial Functional, Locational, or Capacity Changes Require the Amendment
 - Requirement
 - Split Letters Still Required
 - DOL Certification Still Required



CARES/CRRSAA

- ◆ Elements Common in Both Acts
 - No Restrictions on the Period of Performance
 - Grants For Operating Assistance and Preventive Maintenance May Cover a Period That Corresponds to the Expected Spend-Down Rate of the Funds
 - Special Documentation to Claim Operating Expenses
 - None
 - Follow 2 CFR § 200

CARES/CRRSAA

- ◆ CARES/CRRSAA and Title VI
 - Adoption of Cashless Fare Structure During the Pandemic Could Have Title VI Implications
 - Cashless vs. Fare-Free
 - Minority Populations May be More Impacted by Cashless Fare Structures
 - Translation of Documents
 - Service Change Announcements



CARES/CRRSAA

- ◆ CARES/CRRSAA and DBE
 - If CARES Funding Represents an Increase or Expansion of Current Third-Party Contracts, FTA Does Not Generally Require Designated Recipients to Update a DBE Program or Revise a DBE Goal
 - If the Transit Agency Does Not Have a DBE Program, One *May* Be Necessary
 - Consult FTA or MDOT/MTA

American Rescue Plan (ARP)

◆ ARP

- Additional \$30.46 Billion for Public Transportation
- 100% Federal Share Maintained
- Similar to CRRSAA, Focus on Payroll and Operating Expenses
 - Other Types of Expenses Allowable Provided Recipient/ Subrecipient Certifies It Has Not Furloughed Any Employees
- Available Through September 30, 2024

American Rescue Plan (ARP)

◆ ARP

- Distribution of Funds Between Section 5307/
Section 5311 Similar to CRRSAA
 - Section 5307 Funds Limited to 132% of 2018 NTD Operating Expenses, Taking Into Account CARES and CRRSAA Funds
 - Section 5311
 - 150% of 2018 NTD Operating Expenses
 - Additional Funds Based on Actual Percent of 2018
 - Fixed Amount Set-Aside for Section 5311(f)
 - Includes RTAP

American Rescue Plan (ARP)

◆ ARP

○ Section 5310

- Additional \$50 Million Nationwide
- Allocated Based on FY 2020 Allocation Ratio

○ Supplemental Section 5307/Section 5311

- Set-Aside of \$2.2 Billion, on a Competitive Basis, for Systems that Need Additional Assistance
 - Must Have Spent 90% of CARES Funding



Module 3

HOT TOPICS IN FINANCIAL MANAGEMENT



Basic Requirements

- ◆ The Recipient Must
 - Have Financial Policies and Procedures for Managing Federal Awards
 - Internal Controls
 - Determining the Allowability of Costs
 - Have an Organizational Structure that Defines, Assigns, and Delegates Fiduciary Authority



Basic Requirements

- ◆ The Recipient Must
 - Have the Financial Management Systems to Prepare Reports and Track the Use of Funds to Establish Compliance with the Grant Award
 - Have Procedures to for Charging Indirect Costs to FTA Awards, Including Developing Annual Cost Allocation Plans and Obtaining Approval from a Cognizant Agency



Basic Requirements

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Basic Requirement

- ◆ The Recipient Must
 - Conduct Required Single Audits, as Required by 2 CFR Part 200.500 et. seq., Submit Required Documentation to the Federal Audit Clearinghouse, and Resolve Audit Findings
 - Provide the Local Share to Match FTA Awards and Maintain/Operate FTA-Funded Assets
 - Compute the Federal Share of Operating Expenses Correctly

A background map showing a street grid with several colored overlays: a red outline, a yellow outline, and a purple outline, possibly representing different zones or project areas.

Basic Requirement

- ◆ The Recipient Must
 - Provide Sufficient Oversight of Its Subrecipients
 - Requisite Financial Resources
 - Eligible Matching Funds
 - Internal Controls
 - Indirect Costs
 - Single Audits

Top Section 5307 Deficiencies

- ◆ Missing, Insufficient, or Out-of-Date Financial Operating Procedures
- ◆ ECHO Documentation Deficient
- ◆ Financial Management Systems Deficiencies
- ◆ Ineligible Operating Expense Calculation
- ◆ Funds Not Disbursed Timely

Top Section 5311 Deficiencies

- ◆ Insufficient Internal Controls Over Cash or Other Fare Media
- ◆ Improper Documentation of Personnel Expenses
- ◆ No Written Policy Concerning Allowability of Costs
- ◆ Lack of Written Fiscal or Grants Management Procedures
- ◆ Improper Claims of Indirect Costs



Top Section 5311 Deficiencies

- ◆ Insufficient Internal Controls Over Cash or Other Fare Media
 - Issues
 - Failure to Properly Secure Farebox Collections
 - Insufficient Bank Deposit Policies
 - Lack of Secure Storage for Other Fare Media



Top Section 5311 Deficiencies

- ◆ Insufficient Internal Controls Over Cash or Other Fare Media
 - Best Practices
 - Assign Two People to Count at Fare Turn-In
 - Create Secure Deposit of Cash After Administrative Hours
 - Limit Access to Counting Areas
 - Get a Safe If Deposits are Less Frequent Than Daily

A faint, light-colored map of a city street grid is visible in the background of the slide. The map shows various streets and blocks, with some areas highlighted in different colors like red, green, and yellow.

Top Section 5311 Deficiencies

- ◆ Improper Documentation of Personnel Expenses
 - Issues
 - Personnel Whose Time is Split are Required to Maintain a Record of Time Spent by Activity
 - Must Account for All Activity
 - Estimate Generally Not Permitted

Top Section 5311 Deficiencies

- ◆ Improper Documentation of Personnel Expenses
 - Best Practices
 - Know the Conditions in 2 CFR § 200.430(i)(vii) When Documentation is Required
 - Applies to Hourly and Salaried Employees – This Provision is Not Impacted by DOL Rules
 - Maintain Timesheets OR Capture These Salaries Through Indirect Costs

Top Section 5311 Deficiencies

- ◆ No Written Policy Concerning Allowability of Costs
 - Issues
 - Written Fiscal Policies Make No Mention of the Requirements of 2 CFR § 200.302(b)(7)
 - An Entity Must Have Written Procedures for the Determination of the Allowability of Costs

Top Section 5311 Deficiencies

- ◆ No Written Policy Concerning Allowability of Costs
 - Best Practices
 - Know the Conditions in 2 CFR § 200.430(i)(vii) When Documentation is Required
 - Applies to Hourly and Salaried Employees – This Provision is Not Impacted by DOL Rules
 - Maintain Timesheets OR Capture These Salaries Through Indirect Costs

A faint, light-colored map of a city or town is visible in the background, showing streets and property lines. The map is centered behind the title and the main bullet point.

Top Section 5311 Deficiencies

- ◆ Lack of Written Fiscal or Grants Management Procedures
 - Issues
 - Agency Fiscal Policies Tend to be Written as Software Procedure Manuals
 - Policies Do Not Address Federal Requirements or Any Grant Administrative Elements

A faint, light-colored map of a city or town is visible in the background, showing streets and property lines. The map is centered behind the title and the first bullet point.

Top Section 5311 Deficiencies

- ◆ Lack of Written Fiscal or Grants Management Procedures
 - Best Practices
 - Ensure Financial and Managerial Personnel are Trained on 2 CFR § 200 Requirements
 - Seek Out Model Policies from Peer Organizations
 - Update Fiscal Procedures Accordingly



Top Section 5311 Deficiencies

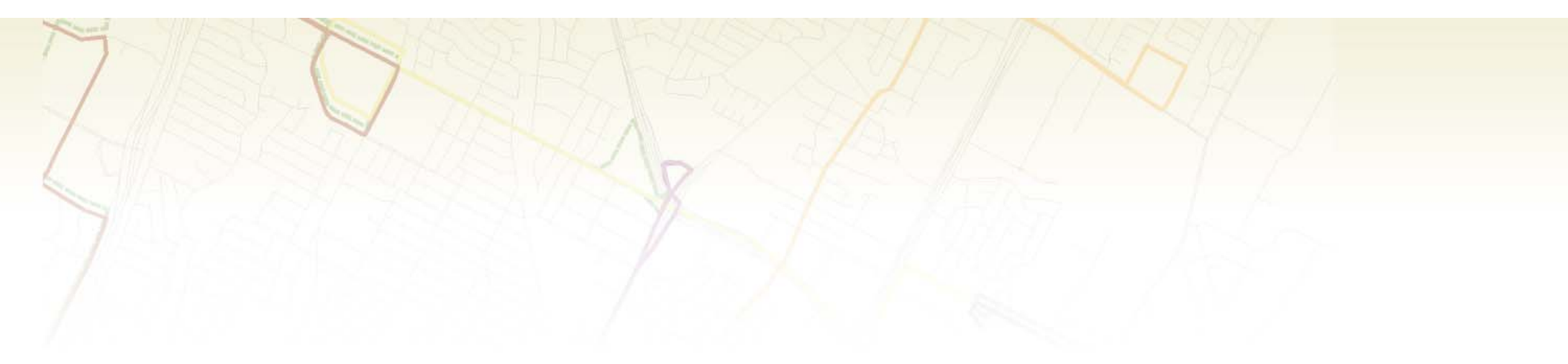
- ◆ Improper Claims of Indirect Costs
 - Issues
 - Indirect Costs Claimed Not Based on Current Indirect Cost Allocation Plan (ICAP)
 - ICAP Lacks Required Components
 - ICAP Not Approved by Any Cognizant Agency
 - Improper Application of de minimis Rate
 - Improper Calculation of Modified Total Direct Costs

Top Section 5311 Deficiencies

- ◆ Improper Claims of Indirect Costs
 - Best Practices
 - Update ICAP Annually
 - Understand the Six (6) Basic Elements Required in an ICAP
 - Ensure the Indirect Cost Rate Proposal (ICRP) Has Been Certified by an Appropriate Local Official
 - If Receiving Funds Primary as a Subrecipient, the Primary Recipient May Approve Your Cost Allocation Plan

Top Section 5311 Deficiencies

- ◆ Improper Claims of Indirect Costs
 - Best Practices
 - Note that With Changes to 2 CFR § 200, All Entities May Use the *de minimis* Rate (Even if the Entity Had Previously Negotiated an Indirect Cost Rate with the Federal Government)
 - Understand What Must be Excluded When Calculating Modified Total Direct Costs (MTDC)
 - Capital Costs
 - Rents
 - Contract Costs Over \$25,000



Module 4

OTHER TRENDING TOPICS

Reference Documents

- ◆ Critical to Understand the Governing Documents
 - 2 CFR part 200
 - 2 CFR part 1201
 - FTA Circular 5010.1E

A background map showing a street grid with several areas highlighted in different colors: a red outline on the left, a yellow outline in the upper center, and an orange outline on the right. The title 'Hot Topics' is centered over the map.

Hot Topics

- ◆ Cost Allowability Principles
- ◆ Indirect Costs
- ◆ Audits
- ◆ Market Price Instability

Allowability Principles

- ◆ Office of Management and Budget (OMB)
 - Predominant Mission Is to Assist the President in Overseeing the Preparation of the Federal Budget and to Supervise Its Administration in Executive Branch Agencies

Allowability Principles

- ◆ OMB Has Management Role in Federal Grants
- ◆ Guidance in Three (3) Primary Areas
 - Cost Principles
 - Grant Management/Administrative Requirements
 - Audit

Allowability – Basic Standards

- ◆ Necessary and Reasonable/Allocable
- ◆ Conform to Any Limitations or Exclusions Set Forth in the Federal Cost Principles, Federal Laws, Terms and Conditions of the Federal Award
- ◆ Be Consistent With Policies and Procedures That Apply Uniformly to Both Federal Awards and Other Activities of the Non-Federal Entity

Allowability – Basic Standards

- ◆ Be Accorded Consistent Treatment
- ◆ Be Determined in Accordance With Generally Accepted Accounting Principles (GAAP)
- ◆ Not Be Included As a Cost or Used to Meet Cost Sharing or Matching Requirements of Any Other Federal Award
- ◆ Must be Adequately Documented



Indirect Costs

- ◆ Allowable to the Extent the Indirect Costs Claimed are Consistent with the Organization's Indirect Cost Rate Proposal (ICRPs) and Approved Rates



Indirect Costs

- ◆ ICRPs Are Submitted to a Cognizant Agency for Indirect Costs
 - OMB Assigns Agency for Entity's that Receive More that Exceed Certain Thresholds
 - For Entities Below the Thresholds, Typically the Federal Agency that Consistently Provide the Most Funding Will Serve as the Cognizant Agency



Indirect Costs

- ◆ When a Subrecipient Receives Funding Only as a Subrecipient from a Pass-Through Agency, the Pass-Through Agency May Review, Negotiate, and Approve the Indirect Cost Rate Proposal
 - MDOT/MTA = Pass-Through Entity
 - Your Program = Subrecipient



Indirect Costs

- ◆ Indirect Cost Rates are Typically Updated Annually Based on the Most Recent Audited Data
- ◆ Beginning in December 2014, a New Type of Indirect Cost Rate was Introduced, the *de minimis* Rate
 - This is an Automatic Ten Percent Indirect Cost Rate that Requires no ICRP Preparation or Approval



Indirect Costs

- ◆ Effective November 12, 2020, This Rate is Now Available to Most Non-Federal Entities
 - Previously Limited to Entities that Had Never Negotiated an Indirect Cost Rate with the Federal Government



Audit Period

- ◆ Audit Period
 - Typically, Performed on an Annual Basis
 - Some Minor Exceptions

Auditee Responsibilities

- ◆ Auditee Responsibilities
 - Preparation of Financial Statements
 - Schedule of Expenditures of Federal Awards (SEFA)
 - A Description of Significant Accounting Policies Used In Preparing The Schedule
 - A Summary Schedule of Prior Audit Findings
 - The Auditee Must Also Prepare a Corrective Action Plan for Current Year Audit Findings

Auditee Responsibilities

- ◆ Schedule of Expenditures of Federal Awards (SEFA)
 - List of Individual Federal Awards
 - Name/Cluster Name
 - Subrecipients
 - Name of Pass-Through Agency
 - Grant Identification Number
 - CFDA Number (Section 5311 – 20.509)
 - Total Amounts Provided
 - Significant Accounting Policies
 - Statement as to Whether Entity Used *de minimis* Indirect Rate

Auditee Responsibilities

- ◆ Optional Elements
 - Multiple Federal Award Years
 - Separate Listing of Amounts Expended, By Year
- ◆ Corrective Action Pan

Auditee Follow-Up

- ◆ Auditee Must Prepare a Summary Schedule of Prior Audit Findings
 - Include Audit Reference Number
 - Status
 - May Exclude
 - Those Findings Corrected
 - Those Findings No Longer Valid or Warranting Further Action
 - Reasons Must be Described
 - » Two Years Have Passed
 - » Federal Agency /Pass Through Entity Not Following Up
 - » Management Decision Was Not Issued

Corrective Action Plan

- ◆ Corrective Action Plan For Current Year Audit Findings
 - Must Address Each Finding
 - Name of Contact Person Responsible for Corrective Action
 - Action Planned
 - Anticipated Completion Date
 - Rebuttal
 - The Corrective Action Plan Must Include An Explanation and Specific Reasons Why the Entity Believes Corrective Action is Not Required

Report Submission

- ◆ Specific Timeframes for Completion
 - Report Must be Submitted to Federal Audit Clearinghouse (FAC) Within 30 Calendar Days After Receipt of Audit Report
 - or
 - Nine Months After End of Audit Period
- ◆ Must Be Available to the Public
 - Some Exceptions for Indian Tribal Organizations



Market Instability

- ◆ Supply Chain Issues
 - Vehicle/Chassis Availability
 - Consolidation of the Market Space
 - Competition from Fleet Operators
- ◆ Dramatic Price Increases
- ◆ Cancellation of Contract Orders
- ◆ Lack of Vendors for Current Procurements



Market Instability

- ◆ Supply Chain Issues
 - Perfect Storm
 - COVID
 - Plant Shutdowns During the Pandemic
 - Chip Shortages
 - Limited Buy America Compliant Vehicles
- ◆ CTAA Estimates 20,000 Vehicle Shortage for Body-on-Chassis Type Vehicles

Market Instability

- ◆ Individual Buyers are Clearly at a Disadvantage Given Current Market Conditions
 - FTA Efforts to Provide Buy America Waiver May Provide Limited (Unmodified Vans) to Community Transportation Providers
- ◆ State Purchasing and Local Government Purchasing Cooperatives May Represent the Best Options in an Exceptionally Competitive Marketplace



Market Instability

- ◆ Initial State DOT/FTA Actions
 - Recognition of the Issue
 - Willingness to Reduce Scope/Quantity and Approve Budget Amendments
 - For Local Procurements, Some Allowance May Have to be Provided for Initial Independent Cost Estimates (ICE)



Market Instability

- ◆ Initial State DOT/FTA Actions

- Rebuilds

- Traditionally Not Extensively Used on this Class of Vehicle
 - FTA Just Relaxed Its Standards for Extended Useful Life for Rebuilds of this Class of Vehicle
 - This May Become a Necessary Option



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