

CONGESTION MITIGATION AND AIR QUALITY (CMAQ) IMPROVEMENT PROGRAM GRANT USE AND ADMINISTRATION – UPDATE

PROGRAM EVALUATION AND AUDIT



**METROPOLITAN
COUNCIL**

November 8, 2017

RECOMMENDATIONS - UPDATE

1. **(Essential) Metro Transit should develop a systematic and consistent approach to ensure that CMAQ subrecipients adhere to all terms of the subrecipient grant agreement.** This approach should include procedures or work instructions that prescribe deadlines and strategies for ensuring adherence.

Timetable: By October 31, 2017 (prior to execution of the next subrecipient agreements).

Update: A pre subgrant agreement checklist has been developed by the project manager.

2. **(Essential) Metro Transit should work with the Council's EO Consultant to determine what is required to be submitted by the subrecipients to be compliant with FTA Circular 4702.1 - Title VI Requirements and Guidelines for Federal Transit Administration Recipients.**

Timetable: By October 31, 2017 (prior to execution of the next subrecipient agreements).

Update: The project manager met with the Council's EO Consultant in September.

- The EO Consultant intends to develop a training session for all small subrecipients specific to Title VI.
- All small subrecipients will be brought in for training during Q1 of 2018.
- Templates/sample documents will be created to assist smaller subrecipients (due end of 2017).

3. **(Essential) Metro Transit Grants and Project Managers should adapt annual subrecipient training sessions that are useful for non-transit providers. Council staff should solicit feedback from the subrecipients on training they could use and incorporate that feedback into future contractual training requirements.**

Timetable: By December 31, 2017.

Update: Training materials, checklist and self-assessment guides are in development.

4. **(Essential) Metro Transit should seek repayment from the TMOs for the costs reimbursed that were not allowable under federal regulations.**

Timetable: By June 30, 2017 (end of quarter).

Update: Anoka and St. Paul Smart Trips have repaid the Council. The I-494 Corridor Commission repayment is in process.

5. **(Essential) A manual should be developed to help guide TMOs with invoice and budget preparation, including the following: a. Procedures on invoice assembly and acceptable documentation. b. Procedures on developing a budget allocation plan defined in accordance with MAP-21.**

Timetable: By December 31, 2017.

Update: In process.

6. **(Essential) Metro Transit's Project Manager should develop procedures and work instructions to guide the Metro Transit invoice review process, including the following:**
 - a. **Tracking when subrecipient invoices are received to ensure that subrecipients are submitting invoices on time and that the invoices are submitted to accounts payable within 10 working days of the received date and to track any issues upon receipt of the invoice from the subrecipients.**
 - b. **Reviewing the backup support submitted with the quarterly billings to ensure that costs are allowable per cost principles in 2 CFR Part 200 and other applicable federal, state or Council requirements.**

Timetable: Immediately

Update: Invoices are date stamped and approved for payment within three business days. If the invoice is not approved within three days, documentation is saved with the invoice file. Additionally, backup is provided that supports the invoices.

7. **(Essential) Metro Transit should require subrecipients to complete the procurement system self-assessment as described by the FTA.** If deficiencies are identified the subrecipient must provide a timeline, subject to Metro Transit's approval, for updating their procurement system.

Timetable: By December 31, 2017.

Update: All subrecipients are required to complete the procurement self-assessment guide. Current subrecipients will complete the assessment and the project manager will work with them to bring their procurement systems in line with federal requirements.

8. **(Essential) The Metro Transit Project Manager should work with Metro Transit Grants to determine what is needed for the quarterly MPRs and how the new reporting format can be used to meet the requirement and potentially update the new format to meet those needs.** Adding a narrative section to the new reporting format could help.

Timetable: Done by July 15, 2017.

Update: Complete.

9. **(Consideration) Metro Transit should consider entering into discussions with Metropolitan Transportation System leadership to identify ways to ensure that recipients of funds from the Regional Solicitation process have the capacity to comply with relevant Federal regulations.**

Timetable: To be completed by December 31, 2017 and in place for the next regional solicitation.

Update: In process.



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