

Title of Procedure:	MDT Oversight Procedures for Subrecipient Compliance for Rolling Stock purchased using ARRA FTA Section 5307 funds	Procedure Number	Revision Date
		PR-FB-008	3/26/13
Division	Miami-Dade Transit, Division of Resource Allocation; Office of Grants Administration	Revision Level	Original Issue Date
		0	3/26/13

Reference Documents:	FTA Master Agreement (MA), FTA Circulars 5010.1D; 9030.1D; 7008.1A; 9300.1B; 49 CFR Part 27, 37, 38 American Disabilities Act, Federal Civil Rights Act, 49 CFR Part 40 Drug and Alcohol Testing, National Transit Database, Section 5307, 49 CFR Section 5335, Rule 14.90 Florida Administrative Code (Equipment and Safety Standards) 2012 FTA Triennial Review Workbook, as amended.
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References to other documents, standards or local, state or federal mandates that amplify or reinforce requirements stated are listed here. Note: Reference Standards above need to be "met" or "equaled" for SOP compliance.

<http://www.fta.dot.gov/13716.html>

<http://www.fta.dot.gov/grants/12897.html> 2012 Triennial Review Workbook

REVIEW LOG

Title	Print Name	Signature	Date
Chief, Budget & Performance Reporting	Robert Villar		
Include SME's			

Interdepartmental reviews by required personnel are listed here.

SOP APPROVAL SECTION

Title	Print Name	Signature	Approval Date
Assistant Director, Financial Services (Interim)	David Ritchey		

List of Records:		

REVISION LOG

Current Rev. No.	Revision Date	Changes	Reason for Change	Initiator
0	3/26/13	New release	New Format	Robert Villar

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1.0 Background

Miami-Dade Transit (MDT) was awarded \$69,802,389 of ARRA FTA Section 5307 grant funds from the Federal Transit Administration (FTA) of which 20% was approved by the Miami-Dade Board of County Commissioners (BCC) for use by municipalities in Miami-Dade County. The 20% allocation to the municipalities is a one-time award. MDT is responsible for overseeing project management and reporting on all the projects progress (inclusive of municipalities) through the life of the grant and life of the asset. Interlocal Agreements (IA) were entered into between MDT and each municipality (subrecipients) for the purchase of buses and trolleys (rolling stock). The nature of this SOP pertains to IAs with MDT and subrecipients for rolling stock.

MDT procured thirty-four (34) buses/trolleys on behalf of seven (7) (subrecipients): The Cities of Coral Gables, Hialeah, Homestead, Miami, Sunny Isles Beach, Miami Beach and Cutler Bay. MDT followed all federal guidelines for the purchases of the rolling stock. (See Attachment A)

A subrecipient is a non-federal third-party entity that expends Federal awards received from a pass-through entity to carry out a Federal program. MDT, as the designated recipient of FTA funds, has passed through ARRA FTA 5307 grant funds to several subrecipients for various transit-related purposes. Due to the grant's funding relationship, FTA requires direct recipients to ensure its subrecipients are compliant with federal regulatory requirements and that Federal awards are used for authorized purposes in accordance with laws, regulations, and provisions of contract or grant agreements.

Note: *MDT performed all procurement activities to ensure federal procurement such as Buy America, Lobbying, and Debarment and Suspension compliance. Prior to rolling stock being transferred to a municipality, MDT obtained all required documents to ensure that the subrecipients were in compliance with all FTA required policies and procedures.*

2.0 Purpose

This SOP identifies MDT's oversight requirements and implementation strategy for monitoring subrecipient use of federally funded assets. While various federal publications capture oversight requirements, MDT used the FTA Triennial Review Workbook as the primary source document for this procedure. Additionally, this SOP identifies the subrecipient oversight compliance areas applicable for rolling stock items. Furthermore, this SOP will identify the applicable division responsible for overseeing the compliance areas identified.

3.0 Scope

Subrecipient compliance requirements for rolling stock will consist of tracking the use and useful life of such items, implementing statutory programs, policies, and management systems.

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4.0 Responsibility

Grant Administration has the responsibility to monitor subrecipient compliance. Due to the diverse nature of compliance requirements, Grant Administration will work in concert with other MDT divisions monitor compliance and report on subrecipient performance.

MDT Divisions	Compliance Areas
Financial Services, Grants Administration	Financial
Financial Services, Performance Analysis, Right of Way Acquisition & Utilities/Joint Development	Satisfactory Continuing Control
Bus Operations	Maintenance
Office of Civil Rights	Title VI
Service Planning and Scheduling	Public Comment
Office of Civil Rights, Service Planning and Scheduling	Half Fare
Office of Civil Rights	ADA
Bus Operations	Charter Bus and School Bus
Human Resources, Materials Management	Drug and Alcohol Program

Grants Administration shall provide training to each division on the purpose of the compliance area, expected subrecipient performance, compliance monitoring processes, documentation standards, reporting of issues, and required follow-up activities.

5.0 Subrecipient Agreements

Miami-Dade County utilizes IAs between the County and respective subrecipients for federal funding pass-through arrangements for the one-time purchase of buses and trolleys. These Agreements describe how the funds are to be used, identify any restrictions placed on the use of funds, roles and responsibilities of each party, and specific federal compliance requirements governing the use of such funds.

Grant Administration is responsible for ensuring that MDT remains current with FTA compliance requirements and that appropriate changes and or updates are included in Interlocal Agreements and compliance monitoring documents.

6.0 Compliance Resources

Grants Administration is responsible for ensuring compliance monitoring is conducted in accordance with this SOP and that any corrective action required by the subrecipient is documented, implemented,

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and assessed to determine that compliance has been achieved. Grants Administration will provide monitoring staff with assistance in establishing the relevant checklists, compliance criteria, and assessment documents for the respective compliance areas.

Grants Administration will use the subject matter expertise (SME) of the following divisions in the compliance monitoring efforts as needed

- Financial Services;
- Grants Administration;
- Performance Analysis;
- Right of Way and Utilities/Joint Development;
- Office of Civil Rights;
- Governmental Affairs;
- Information Officer;
- Engineering Planning and Development;
- Bus Operations;
- Human Resources;
- Materials Management; and
- Other divisions as needed

The compliance monitoring efforts will consist of the following;

- SME's will advise and forward documentation/checklists to the subrecipients of their compliance requirements in advance of compliance verification either by phone and/or email or site visit;
- Subrecipients will respond and provide information, data required for compliance verification to the SME;
- SME's will review the information, checklist and data provided by the subrecipients for completeness.
- SME will evaluate along with Grants Administration if compliance requirements are being satisfied, if so, compliance documentation is provided to Grants Administration for record keeping.
- The MDT Quality Assurance Division shall conduct random on-site QA audits using the completed checklists and/or documentation provided by the subrecipients to ensure compliance.
- Subrecipients not in compliance will be given opportunity to remedy their non-compliance until compliance is met.

Grants Administration, at the beginning of each fiscal year will survey and review all compliance monitoring activities to ensure that compliance is being maintained throughout the year, as well as, establish compliance monitoring activities for the upcoming year.

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7.0 Internal Controls for Compliance Monitoring

As noted in **Section 5.0, Subrecipient Agreements**, various informal and formal activities are used to assess compliance. Prior to the execution of each IA, Grants Administration conducted a compliance scoping meeting with other MDT divisions (SME's) to determine the level of compliance required by the IA.

Grants Administration with the assistance of SME's has determined the level of compliance required to identify internal resources needed, documented the methodology to be used in monitoring, identified roles and responsibilities of staff, and assigned responsibility for conducting, documenting, and communicating monitoring efforts. Grants Administration SME's will coordinate the compliance tools and data needed to allow the MDT Quality Assurance Division to conduct QA Audits activities. Grants Administration will maintain records for each subrecipient to formally capture compliance efforts.

Grants Administration will ensure SME's inform the subrecipients, review compliance expectations and address communication chain of command for questions, document submittals, and scheduling formal compliance review efforts on an as needed basis. SME will coordinate with Grants Administration and MDT Quality Assurance on site visits for the purposes of collected compliance documentation (surveys, checklists or certifications) Grants Administration will meet on a semi-annual basis with the SME's for the respective compliance areas, for a status check and review of compliance effort records and their adherence to compliance requirements. Grants Administration will also take this opportunity at the semi-annual meetings to inform MDT SME's of any updates to federal requirements for any the of the respective compliance areas.

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8.0 Key MDT Performance Metrics

The compliance areas of Financial, Satisfactory Continuing Control, Maintenance, Title VI, Public Comment, Half Fare, ADA, Charter Bus, School Bus Drug and Alcohol Program and EEO will be handled in the following manner:

Satisfactory Continuing Control

- MDT Financial Services will ensure vehicles used by subrecipients are recorded on MDT's inventory and are included in bi-annual inventory conducted by MDT using the MDT fixed asset management system (FAS 100) in accordance with FTA C. 5010.1D requirements

Inventorying Fixed Assets

The subrecipient shall record and place new rolling stock into the subrecipient inventory system at the time of delivery. The subrecipient shall maintain a subsidiary Fixed Assets Ledger Accounting System with the following required information:

- Description – Tag Number/VIN
- Date in service
- Cost of Asset
- Funding Source(s)
- Depreciation
- Location
- Condition
- Disposal date – when applicable

Subrecipients will submit inventory listings to MDT's Grant Administration that properly identify all discrepancies disclosed by physical inventory and signed by the designated subrecipient official indicating that the physical inventory was completed on a given date, and that official property records were found to be in agreement with the physical inventory, except for reported discrepancies. The listing will be furnished with a minimum of delay after the completion of the physical inventory.

MDT's Financial Services shall conduct a physical inventory of each recipient's Fixed Assets every two years in compliance with FTA regulations. The Vehicle Inventory Form summarizes the areas evaluated. Subrecipients will be informed as to when these inspections will take place. (See Attachment B)

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MDT's Grants Administration will assist subrecipients in processing forms related to lost, stolen, and damaged equipment.

Subrecipients shall maintain all support documentation for lost, stolen and damaged equipment and will forward documentation to Grants Administration for record retention.

Disposal

- The subrecipient must send a letter to MDT's Grants Administration requesting disposition of equipment.
- MDT's Assistant Director of Financial Services will provide approval or rejection to the request by letter of concurrence.

Location of Vehicles/Equipment

- The subrecipient shall record the location of each fixed asset item in its accounting or property records.
- The subrecipient must maintain current records as to movement of equipment in such a manner that any item can be located for inspection or inventory purposes within a reasonable time frame.
- Subrecipients must obtain written approval from MDT's Grant Administration for any change in location. Requests and justifications must be made in writing to MDT's Grant's Administration Manager.
- MDT's Grant's Administration Manager will forward the request using a justification to MDT's Assistant Director of Financial Services for approval.
- MDT's Grant's Administration Manager will review the request and provide approval or rejection to the subrecipient by e-mail.

Maintenance

- MDT Bus Operations and Performance Analysis SME's, on an annual basis, ensure subrecipients have written vehicle maintenance standards that met FTA requirements
- MDT Performance Analysis SME provide the compliance criteria and tools needed to review subrecipient vehicle maintenance records, inspect FTA funded vehicles and ensure ADA related vehicle equipment are in working condition.

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- Subrecipient must submit the Preventive Maintenance Annual Report for Equipment (See Attachment C) on an annual basis to Grants Administration. The report is due within 30 days from the end of MDT's fiscal year (October 30th).
- The MDT Quality Assurance Division shall conduct random on-site QA audits using the completed checklists and/or documentation provided by the subrecipients to ensure compliance.

Title VI/Public Comment on Fare and Service Changes

All subrecipients for 5307 Program funds must have completed civil rights program information as required in FTA Circular 9040.1F. Title VI updates must be submitted to MDT's Grants Administration.

Title VI compliance is monitored through the use of on-site visits done annually with subrecipients. These reviews follow the FTA SMR guidelines for Civil Rights. A site visit will be done by MDT Quality Assurance who will complete the form and will follow-up as required either via telephone or on-site. Grants Administration will review submitted service reports for completeness and appropriateness.

General Reporting Requirements

Planned changes in services, facilities, and policy must not result in discrimination against any segment of the community protected under Title VI of the Civil Rights Act of 1964. The subrecipient must ensure that no person is discriminated against on the grounds of race, color, or national origin. Service and facilities planning must take into consideration the potential impact on minority populations.

The subrecipient's Title VI Compliance Checklist and Title VI Self-Survey (See Attachments D & E) should reflect the local subrecipient's policy of planning and providing services in a manner that does not discriminate against any segment of the community protected under Title VI. Updated information should be provided to MDT's Grants Administration as conditions warrant, but at a minimum, Part I of the form should be submitted annually.

- A list of any active lawsuits or complaints naming the applicant which allege discrimination on the basis of race, color, or national origin with respect to service or other transit benefits. The list should include:
 - o The date the lawsuit or complaint was filed;
 - o A summary of the allegation; and
 - o The status of the lawsuit or complaint.
- A description of all pending applications for financial assistance, and financial assistance currently provided by other federal agencies.

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- A summary of all civil rights compliance review activities conducted in the last three years. The summary should include:
 - o The proposed reason for the review;
 - o The name of the agency or the organization that performed the review;
 - o A summary of the findings and recommendations of the review; and
 - o A report on the status and/or disposition of such findings and recommendations.

Grants Administration, in conjunction with the Office of Civil Rights, reviews the information provided by assigned subrecipients using the Title VI Compliance Checklist.

Grants Administration, in conjunction with the Office of Civil Rights, should also review subrecipient compliance in relation to the requirement of FTA oversight as noted on the FTA website.

All Title VI data for subrecipients is maintained and updated by Grants Administration.

- MDT Office of Civil Rights, Title VI Officer-SME will coordinate, on annual basis, with MDT Quality Assurance to provide the compliance criteria and data needed to conduct on-site compliance monitoring to ensure subrecipient compliance of FTA Title VI requirements.
- MDT office of Civil Rights SME will send out annual notifications and instructions (by email) to subrecipients of their responsibility to send MDT periodic reports of Title VI complaints.
- MDT Office of Civil Rights SME will monitor activities by review of subrecipient reports, MDT Quality Assurance scheduled on-site visit and monitoring of complaints to ensure minority, LED (Limited English Proficiency) and low income population input is sought during public outreach and involvement activities
- MDT Service Planning and Scheduling SME will review subrecipients public comment process and policy regarding fare and service changes.
- MDT Service Planning and Scheduling SME will monitor subrecipients to ensure the public comment policy is followed.

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Half Fare

- MDT Service Planning and Scheduling SME/Title VI SME will ensure subrecipients comply with half fare requirements on an annual basis
- MDT Service Planning and Scheduling SME will ensure compliance by reviewing subrecipient files, fare schedule, system brochures, and on their websites, on an annual basis
- SME’s will advise and forward documentation to the subrecipients of their compliance requirements in advance of compliance verification

ADA

- MDT Performance Analysis and Bus Operations SME, will provide MDT Quality Assurance with the compliance criteria and tools needed to conduct scheduled on-site QA Audits to include compliance of ADA service provisions, ADA equipment standards, through review of subrecipient procedures, manuals and maintenance records
- MDT Office of Civil Rights, ADA Officer SME, on an annual basis will notify subrecipients of ADA compliance requirements that require the subrecipient to submit to MDT reports from subrecipients related complaints; reports will detail status of each complaint.
- MDT Office of Civil Rights, ADA Officer SME will provide MDT Quality Assurance with the compliance criteria and tools needed to conduct scheduled on-site QA Audits.

Charter Bus/School Bus Service

MDT requires Section 5307 applicants to certify that they will not perform any charter service by signing the Certification of No Intent of Charter Service Form. (See Attachment F)

The exception to this certification is the conveyance of Government Officials, not to exceed eighty (80) hours of use in a given fiscal year. Each subrecipient may apply for this exception.

Below are the steps for this procedure:

The subrecipient must inform Grants Administration each time the subrecipient decides to use the exception; subrecipients must submit a quarterly report indicating the use of exceptions using the format provided in the FTA Charter Exceptions Quarterly Reporting Form (See Attachment G) within 10 days after the end of the quarter.

Grants Administration reports the conveyances in TEAM.

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- MDT Bus Operations SME will coordinate with MDT Quality Assurance, to obtain a signed document from subrecipients certifying compliance with FTA Charter Service and FTA School Bus Service regulations.

Drug and Alcohol Program

Subrecipients are required to certify that they are adhering to FTA’s Drug and Alcohol policies by submitting an Anti-Drug Program Certification (See Attachment H)

The MDT Human Resource and Materials Management SME’s will be responsible for reviewing the following:;

- Ensure subrecipients have a drug and alcohol testing program for safety sensitive employees that meets FTA requirements
- Ensure that subrecipients who have employees who are subject to Federal Motor Carrier Safety Administration (FMCSA) drug and alcohol testing that also provide services to FTA provided vehicles are covered by FTA Drug and Alcohol Program requirements
- Ensure subrecipient conduct the required types of drug and alcohol testing for all required substances.
- Ensure subrecipients test all covered employees after an accident involving an FTA procured vehicle.
- Ensure subrecipient compliance with FTA Drug and Alcohol Program requirements by conducting on-site visits, reviewing subrecipient plans and records.
- The MDT Quality Assurance Division shall conduct random on-site QA audits using the completed checklists and/or documentation provided by the subrecipients to ensure compliance.

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Equal Employment Opportunity

The Office of Civil Rights, EEO Officer-SME ensures subrecipient compliance by the following activities:

- Annual email notification to all subrecipients informing them of the compliance requirements
- Civil Rights EEO Officer SME provides and obtains all the required EEO compliance data to/from subrecipients via email
- Office of Civil Rights Officer SME will provide MDT Quality Assurance the compliance criteria and data needed to conduct scheduled on-site QA Audits

Grants Administration will review and maintain all relevant compliance documents with the SME's of the respective compliance areas. Subrecipients determined in non-compliance during the monitoring compliance determinations will be given the opportunity to meet compliance.

Attached are sample checklists that will be modified (if needed) for use by respective SME's to conduct compliance monitoring.

- Satisfactory Continuing Control
- Equal Employment Opportunity
- Drug and Alcohol Testing
- Maintenance
- ADA
- Title VI

Miami-Dade Transit Standard Operating Procedure (SOP)

Title of Procedure:	MDT Oversight Procedures for Subrecipient Compliance for Non-mobile Equipment purchased using ARRA FTA Section 5307 funds	Procedure Number	Revision Date
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Assistant Director, Financial Services (Interim)	David Ritchey		

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1.0 Background

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A subrecipient is a non-federal third-party entity that expends Federal awards received from a pass-through entity to carry out a Federal program. MDT, as the designated recipient of FTA funds, has passed through ARRA FTA 5307 grant funds to several subrecipients for various transit-related purposes. Due to the grant's funding relationship, FTA requires direct recipients to ensure its subrecipients are compliant with federal regulatory requirements and that Federal awards are used for authorized purposes in accordance with laws, regulations, and provisions of contract or grant agreements.

2.0 Purpose

This SOP identifies MDT's oversight requirements and implementation strategy for monitoring subrecipient use of federally funded assets. While various federal publications capture oversight requirements, MDT used the FTA Triennial Review Workbook as the primary source document for this procedure. Additionally, this SOP identifies the subrecipient oversight compliance areas applicable for non-mobile equipment items to include bus benches and bus shelters. Furthermore, this SOP will identify the applicable division responsible for overseeing the compliance areas identified.

3.0 Scope

Subrecipient compliance requirements non-mobile equipment (bus benches and bus shelters) will consist of ensuring that the equipment exists is in a state of good condition, and upon any modification to such equipment that it remains in compliance with the American Disabilities Act (ADA) requirements.

4.0 Responsibility

Grant Administration has the responsibility to monitor subrecipient compliance. Due to the diverse nature of compliance requirements, other MDT divisions will work in concert with Grant Administration to monitor compliance and report on subrecipient performance.

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MDT Divisions	Compliance Areas
Financial Services, Performance Analysis, Right of Way Acquisition & Utilities/Joint Development	Satisfactory Continuing Control
Office of Civil Rights	ADA
Bus Operations (Is Bus Op's Resp. for Shelters?)	Maintenance

Note: MDT performed all procurement activities to ensure federal procurement such as Buy America, Lobbying, and Debarment and Suspension compliance.

Grants Administration shall provide training to each division on the purpose of the compliance area, expected subrecipient performance, compliance monitoring processes, documentation standards, reporting of issues, and required follow-up activities.

Comment [Heinze1]: It is advisable to develop a complement SOP for how Grants Adm will accomplish this

5.0 Subrecipient Agreements

Miami-Dade County utilized IAs between the County and respective subrecipients for federal funding pass-through arrangements for the one-time purchase of bus benches and bus shelters. The agreements describe how the funds are to be used, identify any restrictions placed on the use of funds, roles and responsibilities of each party, and specific federal compliance requirements governing the use of such funds.

Grant Administration is responsible for ensuring that MDT remains current with FTA compliance requirements and that appropriate changes and or updates are included in Interlocal Agreements and compliance monitoring documents.

6.0 Compliance Resources

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Comment [LMH2]: How will MDT actually perform the compliance? You will need to identify a lead department/group that will coordinate the required compliance monitoring efforts. This section should also identify how compliance monitoring will be scheduled as well as how corrective action will be addressed.

Grants Administration will use the subject matter expertise (SME) of the following divisions in the compliance monitoring efforts as needed

- Financial Services;
- Performance Analysis;

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- Right of Way and Utilities/Joint Development;
- Office of Civil Rights;
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- Other divisions as needed

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- SME will evaluate along with Grants Administration if compliance requirements are being satisfied, if so, compliance documentation is provided to Grants Administration for record keeping.
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Grants Administration will ensure SME's inform the subrecipients, review compliance expectations and address communication chain of command for questions, document submittals, and scheduling formal

Comment [Helnze3]: Who is ultimately in charge? One of the purposes of the SOP is to designate the dept. field responsible for oversight. This entity determines the level of compliance and communicates such to other departments. This entity sets the standards for how the oversight will be conducted, documented, and how corrective action of the subrecipient is identified and corrected.

Comment [Helnze4]:

Miami-Dade Transit Standard Operating Procedure (SOP)

Title of Procedure:	MDT Oversight Procedures for Subrecipient Compliance for Non-mobile Equipment purchased using ARRA FTA Section 5307 funds	Procedure Number	Revision Date
		PR-FB-009	3/26/13
Division	Miami-Dade Transit, Division of Resource Allocation; Office of Grants Administration	Revision Level	Original Issue Date
		0	3/26/13

compliance review efforts on an as needed basis. SME will coordinate with Grants Administration and MDT Quality Assurance on site visits for the purposes of collected compliance documentation (surveys, checklists or certifications) Grants Administration will meet on a semi-annual basis with the SME's for the respective compliance areas, for a status check and review of compliance effort records and their adherence to compliance requirements. Grants Administration will also take this opportunity at the semi-annual meetings to inform MDT SME's of any updates to federal requirements for any the of the respective compliance areas.

8.0 Key MDT Performance Metrics

The compliance areas of Satisfactory Continuing Control and ADA will be handled in the following manner:

Satisfactory Continuing Control

- MDT Financial Services will ensure non-mobile equipment valued at \$5,000 and above, used by subrecipients are recorded on MDT's inventory and are included in bi-annual inventory conducted by MDT using the MDT fixed asset management system (FAS 100) in accordance with FTA C.5010.1D requirements
- MDT Performance Analysis SME, on an annual basis, will provide MDT Quality Assurance the compliance criteria and tools needed to conduct compliance monitoring site visits and document status of equipment (in place and free of damage)

Inventorying Fixed Assets

The subrecipient shall record and place new non-mobile equipment into the subrecipient inventory system at the time of delivery. The subrecipient shall maintain a subsidiary Fixed Assets Ledger Accounting System with the following required information:

- Description
- Date in service
- Cost of Asset
- Funding Source(s)
- Depreciation
- Location
- Condition
- Disposal date – when applicable

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Subrecipients will submit inventory listings to MDT's Grant Administration that properly identify all discrepancies disclosed by physical inventory and signed by the designated subrecipient official indicating that the physical inventory was completed on a given date, and that official property records were found to be in agreement with the physical inventory, except for reported discrepancies. The listing will be furnished with a minimum of delay after the completion of the physical inventory.

MDT's Financial Services shall conduct a physical inventory of each recipient's Fixed Assets every two years in compliance with FTA regulations. The Equipment Inventory Form summarizes the areas evaluated. Subrecipients will be informed as to when these inspections will take place (See Attachment B.)

MDT's Grants Administration will assist subrecipients in processing forms related to lost, stolen, and damaged equipment.

Subrecipients shall maintain all support documentation for lost, stolen and damaged equipment and will forward documentation to Grants Administration for record retention.

Disposal

- The subrecipient must send a letter to MDT's Grants Administration requesting disposition of equipment.
- MDT's Assistant Director of Financial Services will provide approval or rejection to the request by letter of concurrence.

Location of Non-Mobile Equipment

- The subrecipient shall record the location of each fixed asset item in its accounting or property records.
- The subrecipient must maintain current records as to movement of equipment in such a manner that any item can be located for inspection or inventory purposes within a reasonable time frame.
- Subrecipients must obtain written approval from MDT's Grant Administration for any change in location. Requests and justifications must be made in writing to MDT's Grant's Administration Manager.
- MDT's Grant's Administration Manager will forward the request using a justification to MDT's Assistant Director of Financial Services for approval.

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- MDT's Grant's Administration Manager will review the request and provide approval or rejection to the subrecipient by e-mail.

ADA

- Office of Civil Rights will review ADA information, checklists and data provided by the subrecipients for completeness and provide the compliance criteria and tools needed to the MDT Quality Assurance Division to conduct scheduled on-site QA Audits to ensure facilities continue to comply with ADA requirements.

Grants Administration will review and maintain all relevant compliance documents with the SME's of the respective compliance areas. Subrecipients determined non-compliant during the monitoring will be given the opportunity to meet compliance.

Attached are sample checklists that will be modified (if needed) for use by respective SME's to conduct compliance monitoring.

- Satisfactory Continuing Control
- Equal Employment Opportunity
- Drug and Alcohol Testing
- Maintenance
- ADA
- Title VI