

## **NDOT Transit Section Financial Policies, Procedures, Reporting and Subrecipient Monitoring**

### **Objective:**

The Nebraska Department of Transportation (NDOT) administers federal and state grant programs to fund transit operations, vehicle purchases and capital construction projects. As the direct recipient of funds from the Federal Transit Administration (FTA) the NDOT Transit Section is responsible for statewide public transportation planning, coordination, grant administration, compliance, training and technical assistance. These policies and procedures outline the general financial guidelines for the administration of FTA funds and subrecipient monitoring.

### **State Management Plan:**

The FTA approved state management plan outlines in detail application procedures, selection processes and compliance requirements. The plan is available to the public at <https://www.nebraskatransit.com/>.

### **Federal Grant Subrecipient Monitoring (2 CFR 200):**

#### Policy

As a non-federal entity NDOT is responsible for the efficient and effective administration of Federal awards in a manner consistent with underlying agreements, program objectives and the terms and conditions of the Federal award. NDOT accounting practices are consistent with the cost principles in 2 CFR 200 and obtain adequate documentation to support costs charged to the Federal award. In addition, any subrecipient charging indirect costs must provide approval from the cognizant agency.

#### Allowable Costs

Subrecipients receiving funding for operations through the FTA's Section 5311 program, submit monthly invoices for reimbursement of allowable costs. The NDOT Transit Section refers to 2 CFR Part 200, Subpart E – Cost Principles to determine allowable costs.

There are 10 allowable cost standards as defined by the Federal government:

1. Cost reasonableness
2. Costs must be allocable (ability to be distributed properly)
3. No prohibition under law
4. Conformance with principles, grants, and regulations

5. Consistency with policies
6. Consistent accounting treatment
7. Conformance with generally accepted accounting principles
8. Prohibition of use as local match
9. Net costs
10. Documentation

NDOT reimburses allowable operating costs with 50% federal funds and non-operating costs with 80% federal funds. State funds are available to match local funds. Examples of costs include driver salaries, fuel, vehicle maintenance, insurance and marketing.

### ECHO Draws

NDOT operates on a reimbursable basis for all ECHO draws. Below is a description of the process for preparing and submitting ECHO draws against NDOT's grants from the Federal Transit Administration.

1. Every month, the Federal Aid Administrator III in NDOT's Controller Division processes drawdowns from its Project Finance System (PFS) for each federal grant that have incurred payments on invoices identified to the grant by an Apportionment Code.
2. A PFS Federal Test Billing is prepared and provided to the Federal Aid Administrator III in NDOT's Transit Section for review and reconciliation with the grants in the Federal Transit Administration's Transit Awards Management System (TRAMS) . A PFS Federal Test Billing includes the amounts not previously billed by apportionment Code, Control Number and Project Number. The Transit Section's Federal Aid Administrator III emails the Controller Division with the approval to proceed with the drawdown with a list of Apportionment Codes and amounts.
3. NDOT's Highway Budget and Finance Manager reviews and approves the request amount.
4. Controller Division submits the ECHO draw request.
5. An electronic copy of the submittal is forwarded to the NDOT Transit Section. A copy is filed in the agency's ECHO files in Controller Division.

### Ongoing Monitoring

Annually, the NDOT Transit Section receives approximately 700 invoices for operating assistance. Desktop reviews of reimbursement invoices are conducted based on a risk assessment analysis and triggering events. At least one desktop review is conducted for each 5311 subrecipient annually. During reviews documentation is requested to confirm expenses are allowable. Documentation can include copies of invoices, canceled checks and payroll records. Please see the appendix for more detailed information about NDOT's desktop review process and invoice workflow.

NDOT conducts on site reviews of 5310 and 5311 subrecipients at least once every 3 years. During on-site visits, the NDOT reviewer utilizes a checklist to determine compliance with vehicle maintenance, civil rights, drug and alcohol testing, etc. Deficiencies are identified in a follow up report provided to the subrecipient. The subrecipient is required to respond and provide NDOT with documentation that all deficiencies have been corrected. Please see the appendix for a template site visit checklist.

## **Transit Award Management System (TrAMS) Grants Management (FTA Circulars 9040.1G and 9070.1G)**

### Award Closeout

NDOT will close out projects within a reasonable, specified time and as scheduled in the award agreement and updated in progress reports. Active awards will be reviewed at least once every 30 days to ensure projects are on schedule, active and updated.

Project closeout will be initiated within 90 days after all funds have been expended and work activities completed. NDOT will submit the final FFR, budget and POP to FTA.

### Federal Financial Reports (FFRs) and Milestone Progress Reports (MPRs)

The FFRs and MPRs for all active grants will be submitted to the NDOT Transit Manager for review no later than October 10 of each fiscal year. Revisions will be made as needed and the information will be submitted in TrAMS no later than October 20 of each fiscal year.

- A. Prior to submitting the annual FFR, the reporter will review the fund status reports for each active grant in TrAMS. Required information to be submitted in FFR includes the following:
  1. Indirect Expenses (as applicable)
  2. Federal Cash on Hand at Beginning of Period
  3. Federal Cash Receipts
  4. Federal Cash Disbursements
  5. Federal Cash on Hand at End of Period
  6. Total Federal Funds Authorized
  7. Submission remarks to include information to explain entries on the FFT, Reconciliations, etc.
- B. The MPRs will include a detailed description of the current status of the grant including the following:
  1. Actual completion dates for completed milestones
  2. Revised estimated completion dates
  3. Current status of each open ALI within the active grant
  4. Date of expected or actual requests for bid, delivery, etc.
  5. Explanation of late milestones or completion dates
  6. Problem areas and narrative of how problems will be solved

7. Expected impacts and efforts to recover from project delays
8. Rolling stock ALIs will include a milestone for Contract Award

### Annual Program of Projects (POP) Status Reports

The POP status reports for 5310 and 5311 awards will be submitted to the NDOT Transit Manager for review no later than October 10 of each fiscal year. Revisions will be made as needed and the Annual POP Reports submitted by October 20 of each fiscal year. The reports will be attached to the grant's corresponding MPR in TrAMS.

The reports will cover active grants from the previous 12-month period ending September 30. The reports will include the following at a minimum:

1. Revised project descriptions
2. Changes in project category
3. Adjustments to budget categories
4. Changes to line item budgets submitted as budget revisions
5. Significant civil rights compliance issues
6. Accomplishments, problems and project delays encountered in administering the grant
7. Action plan to correct problems and project delays as applicable

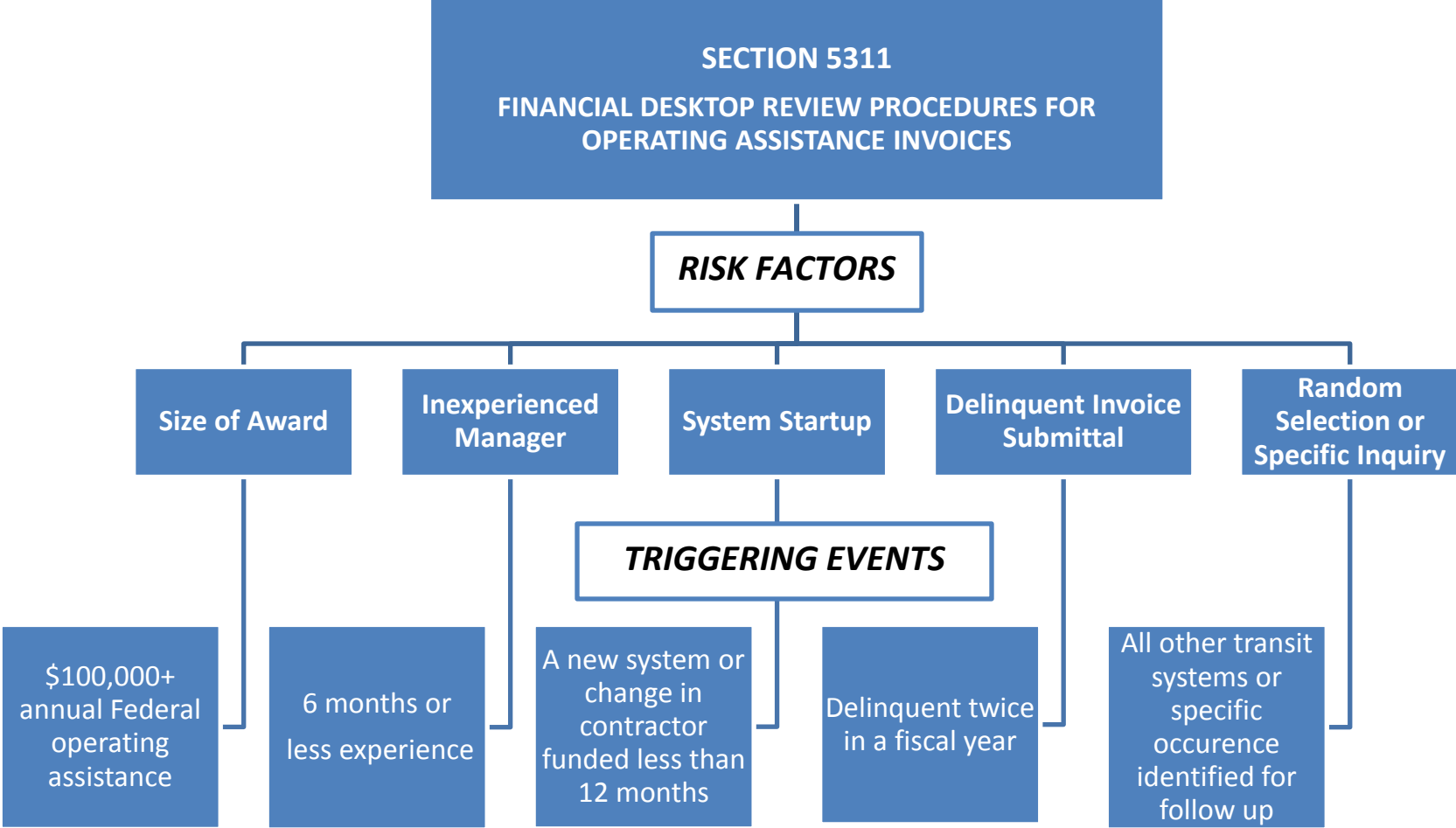
## **APPENDIX**

### **Appendix A: Desktop Audit Procedures**

### **Appendix B: 5311 Operating Assistance Invoice Workflow**

### **Appendix C: 5311 Site Visit Checklist Form**

# Appendix A



## **ACTIONS**

### **SIZE OF AWARD**

**Triggering Event:** Transit systems receiving annually \$100,000 or more Federal funds for operating assistance

Request with application:

1. Agency financial policies and procedures
2. Documentation that substantiates indirect cost rate

Annually request and review:

1. Payroll detail
2. Non-operating expenses (at reviewer's discretion)

### **INEXPERIENCED MANAGER**

**Triggering Event:** Transit Manager with 0-6 months of experience in current position

Request and review documentation for one item within the first 6 months:

1. Vehicle revenue hours of service
2. Mileage record keeping
3. Cash handling and deposit process
4. Non-operating expenses
5. Maintenance expenses
6. Fuel receipts

### **SYSTEM START UP**

**Triggering Event:** Newly funded transit system or new contractor

Request and review two items to review within 1st 12 months:

1. Vehicle revenue hours of service
2. Mileage record keeping
3. Cash handling and deposit process
4. Non-operating expenses
5. Maintenance expenses
6. Fuel receipts

### **DELINQUENT INVOICE SUBMITTAL**

**Triggering Event:** Invoice due date is 30 days after the last day of the month. Invoices are delinquent when 30 days past the due date or 60 days after the last day of the invoice month. Review procedures begin after two instances of late submittal in one fiscal year.

1. Request and review all supporting documentation for all line items for each worksheet for all delinquent invoices.

### **RANDOM SELECTION OR SPECIFIC INQUIRY**

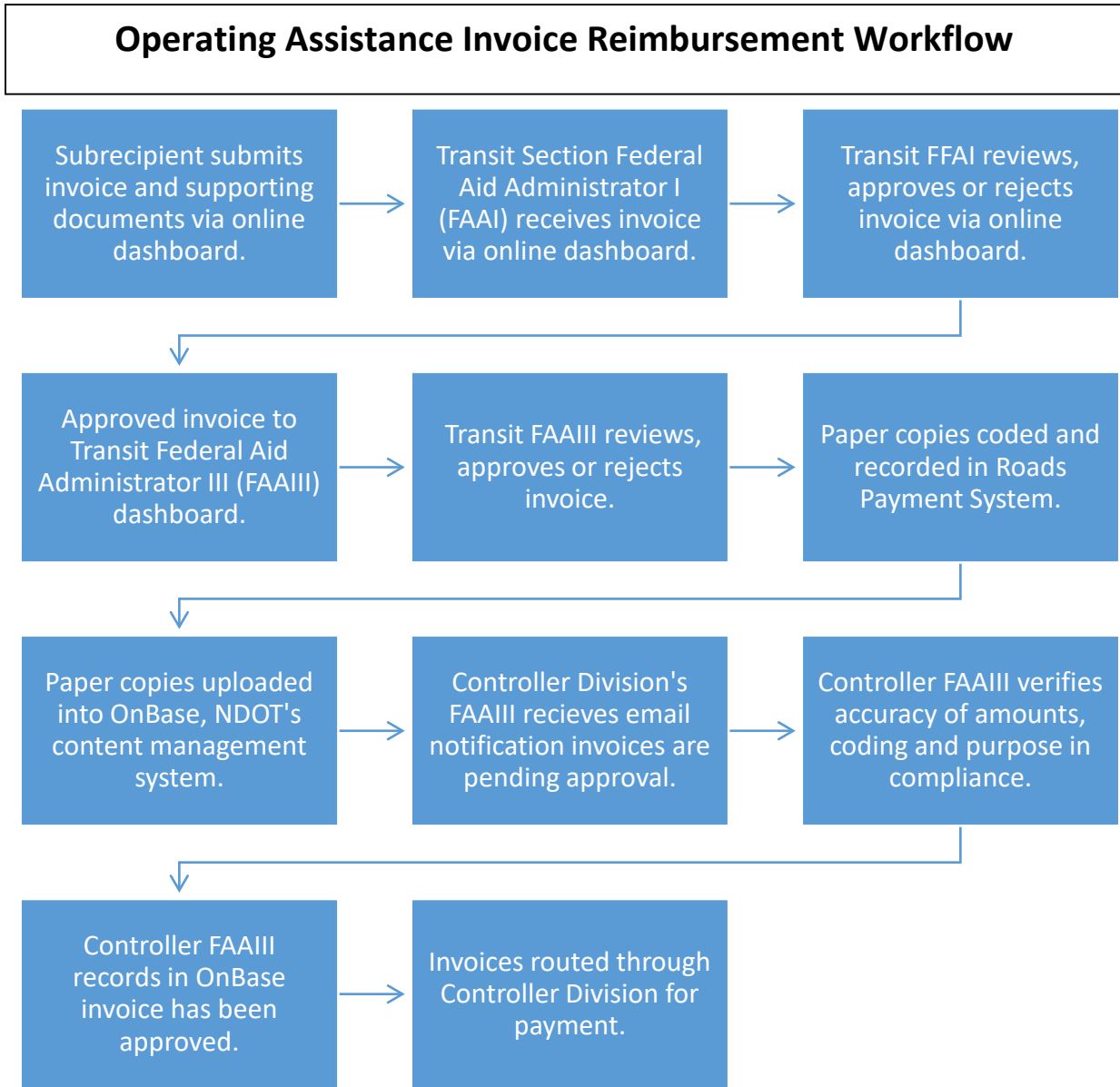
**Triggering Event:** Other transit systems that do not meet the review criteria above will be randomly selected for invoice review no less than once per 24 month period. A specific inquiry review is triggered after a general review identifies a potential issue that requires further investigation.

1. Request and review documentation at reviewer's discretion.

## **PROCESS**

1. The Transit Federal Aid Administrator I will be responsible for conducting desktop reviews.
2. The Transit Federal Aid Administrator III will be consulted as necessary.
3. The NDOR Controller Division, Audit Section will be consulted as necessary.
4. If it is determined that a site visit is required to further review financial procedures, that visit will be conducted by the Federal Aid Administrator III.
5. A spreadsheet will be maintained to track transit systems, audit categories, dates, follow up, outcomes, etc.
6. An audit review form will be completed and retained for each review.
7. **If finding(s) requiring follow-up are identified the following procedure will be implemented:**
  - a. Forward a letter of finding(s) to the transit system, corrective action items for the transit system, corrective action items for Transit staff, and follow up due dates.
  - b. Review transit system response from letter of finding(s) and determine if adequate.
  - c. Request additional information if required.
  - d. Close out with a letter of acceptance to the transit system.
  - e. Any further follow-up to be determined by the Federal Aid Administrators I and III.
8. The review file will be retained electronically. The file will include all requested information from the transit system, the desktop review form, correspondence, close out documentation and all other relevant materials.

# Appendix B





# Appendix C

Transit Agency:

Revised: *September 19, 2016*

Agency Representative Name:

Agency Contact Information:

Address:

Phone:

Email:

## **Compliance Review for Nebraska 5311 Subrecipient Onsite Review Checklist**

Reviewer Name:

Email:

Phone:

Date of Site Visit:

Site Visit No.:

# Table of Contents

## Introduction

### Required Documents

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- Section 2: Civil Rights
- Section 3: Service Area
- Section 4: Financial
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- Section 8: Maintenance

## Introduction

The Nebraska Department of Roads is required to provide oversight and technical assistance to subrecipients of funding from the Federal Transit Administration. Subrecipient site visits are conducted at least once every three years as per the NDOR Transit Section State Management Plan.

Documentation will be requested before the site visit. Please forward all requested information by the deadline provided. Documents will also be reviewed onsite. Please ensure that all documents to be reviewed are readily available during the visit.

This checklist will be utilized by the reviewer during your visit. Please answer ALL questions on the checklist and return to the reviewer with the required documents by the due date.

After the review, a follow-up report will be issued. The subrecipient will be required to take corrective action to address all findings.

## Required Documents

Documents will be reviewed prior to the site visit and during the on-site review. Please ensure that the required documents are provided by the due date or available during the review. Use the checklist below to ensure the required documents are provided as needed.

Send these documents with the completed checklist by the due date:

1. Rider handbook or passenger policies.
2. Reasonable modification/accommodation rule adopted by the agency.
3. Reasonable modification/accommodation rule complaint form template.
4. All reasonable modification/accommodation complaint forms submitted to the agency.
5. Maintenance plan adopted by the agency.
6. Preventative maintenance (PM) schedules for FTA funded vehicles (maximum of schedules for 10 vehicles is sufficient.) Provide active forms that indicate PM is scheduled and completed as required.
7. Invoices, mechanic inspection sheets, etc., that provide evidence that the correct maintenance is being performed at the correct intervals.
8. Copies of titles for FTA funded vehicles.
9. Copies of completed pre- or post-trip inspections.
10. Copies of completed documents that indicate lifts are being cycled (disregard if this action is part of the pre- or post-trip inspection.)

These records must be available during the on-site review:

1. Title VI documents (plan, posters, complaint form, etc.)
2. EEO poster
3. Transit accounting documents
4. Driver training records
5. Marketing materials
6. Passenger handbook and/other written policies
7. Drug and alcohol testing compliance records
8. Procurement policies
9. Maintenance records for all transit vehicles

## Section 1: Eligibility

1. Are all transit services provided by the agency open to the general public? If not, please describe in detail.
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

2. How are services advertised to the general public?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

3. Are all vehicles providing service as part of the public transit program marked with the agency name and contact information on both sides?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

4. Describe any "incidental" services (e.g., meal delivery) provided using federally funded vehicle?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

4a. Does the incidental service disrupt regular public transportation service?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

4b. Is incidental service funded by a different program?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

5. Does the public transportation system transport children to school? If yes, please describe the service provided.
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

6. Does the agency ever allow exclusive use of the transit vehicle (i.e., charter service)?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

## Section 2: Civil Rights

1. Is the Title VI Notice to the Public posted? If so, where?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

2. Are Title VI Complaint forms and complaint procedures available in the transit office?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

3. Are Title VI Complaint forms and complaint procedures available in each federally-funded vehicle?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

4. Are Title VI Notice to the Public posters located in every federally-funded vehicle?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

5. Are required EEO posters displayed at transit agency office, contractors' offices, transit garage, etc.?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

### Section 3: Service Area

1. Does the agency transport individuals across state lines with a commercial motor vehicle?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite
2. Has the agency registered as a motor carrier with the Federal Motor Carrier Safety Administration of USDOT?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite
3. If the agency is registered with the FMCSA, do the commercial motor vehicles display the assigned USDOT numbers?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

## Section 4: Financial

1. Does the agency's accounting system track all revenues and expenses attributable to the public transit program?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite
2. How are these revenues and expenses clearly identified as being related to the public transit program?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite
3. How does the agency ensure that the fully-allocated costs of providing incidental services are covered by other than state or federal transit funds?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite
4. How does the agency ensure that state and federal transit funds are spent only on costs attributable to the public transit program?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite
5. Describe how fares are collected, recorded and deposited. Who in your organization is responsible for handling fares from collection to deposit?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite



### Section 5: General ADA

1. Are ADA services needs met with the current fleet?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

2. Are wheelchairs accepted in all of the agency's service areas?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

3. Does the agency require that wheelchairs be secured?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

4. Will the agency still transport if driver is not able to secure wheelchair?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

5. What types of "service animals" are accepted aboard vehicles and in facilities?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

6. How does the agency determine if an animal is a "service animal?"
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

7. Can a person not using a wheelchair request to ride a wheelchair lift?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

8. Have all drivers been trained to use the wheelchair lifts/ramps and the wheelchair securement system(s)?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

9. Does all literature/advertising include information that all services are open to the general public, including persons with disabilities?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

10. How does the agency handle a caller who requests a ride at a time when the transit vehicle(s) is/are busy?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

11. Does the agency have a suspension policy for a pattern or practice of no shows?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

12. On the average, how many denials does the agency have per month? Does the agency track the reasons for denials?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

13. How long does/would such a denial of service last?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

14. Who makes the decision on denial of service?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

15. What opportunity for appeal or administrative review is offered?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

16. How are the agency's policies on denial of service documented and communicated to the public?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

17. Does the agency have a “rider’s handbook” describing the agency’s policies and procedures relating to the ADA paratransit services?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

18. Does the agency have a written policy to comply with the reasonable modification/accommodation rule?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

19. Does the agency have a complaint form for passengers to request a modification of service?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

20. Who at the agency is designated to receive and review the complaint forms?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

### Section 6: Drug and Alcohol

1. Is the agency drug and alcohol policy and board approval on file in the transit office?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

2. Does the agency have documentation that each employee has received a copy of the testing policy?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

3. Does the agency keep a record of employees selected for random testing and whether the tests were actually conducted?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

4. Are employee test records/results kept in a separate file cabinet with lock?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

5. Who has access to these records/results?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

6. Who makes the decision whether to send driver and/or others for collection following an accident that triggers an automatic test?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

7. Does the agency use a form to document post-accident decisions regarding testing?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

8. Who makes the decision on whether to send an employee for reasonable suspicion testing?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

9. Does the agency have a form to document determination of reasonable suspicion?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

## Section 7: Procurement

1. Have any items charged to the public transit program over the past three years been purchased from businesses owned by board or staff members of the agency or by members of their families? If so, please explain how a conflict of interest was avoided.
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

2. Does the agency maintain a record of the history of each procurement charged to the transit program? If so, what information is recorded?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

### Section 8: Maintenance

(Individual vehicle inspections and reports to be completed at site review.)

1. Does the agency have written maintenance plans for FTA-funded transit facilities and equipment?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

2. Do the preventative maintenance schedules in the plan meet the minimums required by the manufacturer or supplier?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

3. Are there maintenance records for each vehicle available for review?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

4. Are the vehicle records identified by the VIN number?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

5. Does a comparison of three preventative maintenance schedules and invoices indicate that maintenance is being completed per the subrecipient's schedule ( <i>within a 10% variance</i> )?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite



6. Are the titles for FTA funded vehicles in the name of the subrecipient/applicant?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

7. Are there written records indicating that pre-trip and/or post-trip inspections are completed?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

8. Is there documentation that drivers cycle the lifts each day prior to the vehicle being placed in service?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

9. Is all work required by manufacturer's warranty provisions being performed? If not, why?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite

10. Is any FTA funded equipment under warranty and if so, what is the process for recovering warranty claims?
<b>Agency Response:</b>
<b>NDOR Comment:</b>
<input type="checkbox"/> Previous Finding <input type="checkbox"/> Recommendation <input type="checkbox"/> Finding <input type="checkbox"/> Resolved onsite