DCHC-MPO

Grant Administration

&

Fiscal Program Management Procedure Manual

Updated June 12, 2019

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Introduction

Durham-Chapel Hill-Carrboro Metropolitan Planning Organization (DCHC-MPO) is responsible for transportation planning in the urbanized areas (UZA) of Durham and Orange counties and parts of northern Chatham County. DCHC coordinates, plans, and oversees all grant management activities related to transportation. The term "grant" applies to cost-reimbursable, one-time payment, and cooperative agreements that provide financial assistance to DCHC-MPO. The lifecycle of transportation grants can be lengthy, starting with Federal appropriations, grant awards, selection of projects, to project completion. Careful management and distribution of transportation funds by the MPO is central to planning for the current and future transportation needs of the UZA.

The purpose of this manual is to document and provide Lead Planning Agency (LPA) staff with a resource that directs the management of DCHC-MPO Grant funds. As stewards of federal, state, and local funds, it is important staff, member agencies, and sub-recipients understand the policies and procedures associated with managing grants received. All agencies that receive funding are expected to adhere to the Federal and State compliance regulations, and DCHC policies and procedures associated with each specific grant. Although this manual contains policies and procedures, it is not meant to be all inclusive. Users may need to refer to other documents or the **Resources & Tools** section to ensure full compliance to federal and state regulations.

DCHC administers millions of dollars of transportation grants each year. Grants come from several sources, with different requirements and accounting protocol associated with each. This manual aims to clarify the management and internal processes of grants that are regularly awarded (grants offered infrequently are not addressed in this document). Updates to this procedure manual will occur as new grants become accessible or existing grants undergo policy or regulation changes. New Federal Transit Administration (FTA) programs and changes to existing programs authorized by the Moving Ahead for Progress in the 21st Century Act (MAP-21) and Fixing America's Surface Transportation (FAST) Act will be included in this manual as those regulations become applicable.

Goals & Objectives

The mission of DCHC-MPO Grants Management is to ensure fiscal accountability of Federal and State funds effectively in compliance with regulations, grant agreements, and applicable FTA Circulars. The responsibility for understanding and adhering to City, State, and Federal regulations is shared by the MPO, other city departments, North Carolina Department of Transportation (NCDOT), and all sub-recipients.

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Ensure proper disbursement of and accounting for State and Federal grant funds appropriated and awarded to DCHC:

- a. Establishing written accounting policies and procedures.
- b. Maintaining source documentation to support accounting records.
- c. Monitoring proper allocation and distribution of funds.
- d. Providing a comparison of actual expenditures with budgeted amounts for each sub-grant and contract.
- e. Providing regular financial compliance reviews of sub-recipients to determine if they are in compliance with professional standards as well as the requirements of federal, state and local laws and the grant agreement.
- f. Close-out grants when all activity is complete.

Serve as MPO's liaison to member agencies, NCDOT, FTA, FHWA, City of Durham internal departments, auditors, and the general public on funding issues by:

- a. Maintaining regular contact with sub-recipients.
- b. Compiling and reviewing policies and regulations.
- c. Ensuring compliance of federal regulations on part of sub-recipients, consultants, contractors, or sub-contractors working under approved third-party contracts or inter-agency agreements.
- d. Maintaining regular communication with the Technical Committee (TC) and the MPO Board.
- e. Provide financial reports for grants/specific projects.

Constantly monitor grant activities to ensure compliance, maintain project schedules, and have accountability for all grants by:

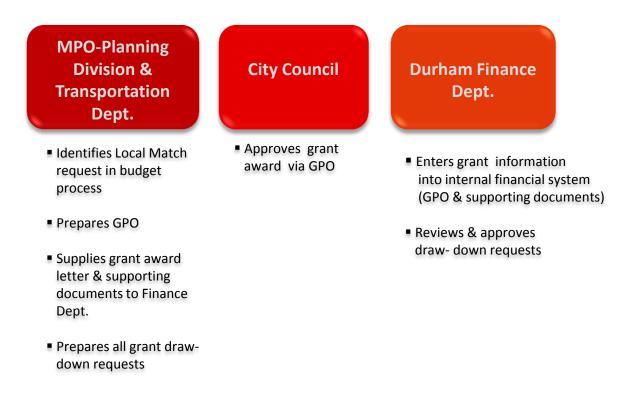
- a. Preparing and submitting all required reports and maintaining internal documentation.
- b. Requesting grant funds in timely and effective manner (only requesting appropriate amounts at times needed to make payments that are immediately due and payable).
- c. Monitoring grant activities to make sure schedules are met and other performance goals are achieved.
- d. Ensuring conformity to grant agreements, applicable statutes, codes, ordinances, and safety standards.

Internal Grant Process

(City of Durham)

Grants received by DCHC-MPO are also subject to City of Durham policies and procedures. The City requires that all grants awarded be approved by the City Council and the City Manager. DCHC-MPO must seek approval for every grant by submitting a Grant Project Ordinance (GPO) to City Council for inclusion on the Agenda. The GPO is important because it formally accepts the grant, appropriates any additional local match required (by all sub-recipients), and specifies other characteristics of the grant.

Internal Grant Award Process



Accounting for Expenditures

Municipal Information Systems (MUNIS) is a suite of administrative software that is utilized by all Durham affiliated agencies including the LPA and GoDurham). MUNIS allows the City to provide a common data and financial reporting system to all departments. The LPA utilizes MUNIS for direct costs, purchase orders, reconciling sub-recipient invoices, and requisitions. The Grant Administrator manually records the local match portion of grants in MUNIS so that expenditures are equal to the budgeted grant (100% gross up). This information is included the local match log.

Accounting for Revenue

Revenue from grant funds are requested from federal and state agencies by using their financial management systems. The Durham Finance Department certifies that the LPA has incurred and processed payments up front for grant projects that are cost-reimbursable prior to the LPA submitting any fund draw-down requests. The following pages provide an overview of grant sources and financial management systems.

Grant Sources

Grant funds are awarded from several federal and state sources that have different project management systems. In order to submit applications, receive electronic fund transfers, and manage sub-recipients, these systems must be utilized. Most often the MPO Grant Administrator accesses these systems on behalf of sub-recipients, although some systems require both the MPO and sub-recipients enter data. The financial systems utilized for each specific grant is explained in the *Grants & Policies* section.

NC Dept. of Transportation (NCDOT) and Partner Connect

NCDOT is the agency responsible for transportation planning state-wide and can also act as the pass-through agency for some federal grants. Pass-through grants gives stewardship of federal monies to the state, which sub-allocates monies to the MPO (these monies are still considered federal and subject to any applicable federal regulation). Partner Connect is NCDOT's information and project management website. Governmental and business partners can find resources, collaborate, submit documents, and request pass-through monies. The Partner Connect system is utilized with the Section 5303 grant.

Federal Highway Administration (FHWA)

FHWA is the agency within the U.S. Department of Transportation that supports the design, construction, and maintenance of the national highway system and various federal and tribal owned lands. FHWA provides financial and technical assistance to DCHC-MPO via STBG-DA, CMAQ, and Planning 104(f) grants.

Grant Sources & Financial Management

Federal Transit Administration (FTA) and the Transit Asset Management System (TrAMS)

FTA is the agency within the US Department of Transportation that provides financial and technical assistance for local public transportation systems. TrAMS allows grant recipients and the FTA to manage projects after the award. Users can monitor project budgets and milestones, make budget and scope revisions, and perform other project management activities. The MPO Grant Administrator utilizes TrAMS to submit documentation and monitor the compliance of sub-recipients (both the MPO and sub-recipients submit documentation through TrAMS).

Major MPO reports and requirements submitted in TrAMS:

- Federal Financial Reports
- Annual Single Audits (OMB Circular A-133)

Grant Amendments and Grant Close-outs

- Milestone Progress Reports
- Civil Rights Reports
- Drug & Alcohol Testing Reports
- Budget Revisions
- National Transit Database (NTD)

Requesting funds from the FTA requires the creation of a Federal Financial Report (FFR) in the TrAMS financial system. FFRs are the universal cash transaction and grant expenditure form accepted by all Federal agencies. The MPO Grant Administrator creates a draft FFR, submits it to the Durham Finance Department for certification, and completes the funds request in ECHO.

Grant Sources & Financial Management

FTA and Electronic Clearing House Operation System (ECHO)

ECHO is FTA's web-based application that processes draw-down requests and payments to grantees. A web-draw form is submitted via ECHO for all reimbursements of FTA grants. The system is used to process and transmit requests approved for payment to the MPO's financial institution electronically via the U.S. Treasury's Automated Clearing House (ACH) process. Grants that require use of TrAMS and ECHO:

- 1. Section 5307 (These grants are managed by direct recipients in TrAMS.)
- 2. Section 5310 (DCHC MPO manages these grants in TrAMS.)
- 3. Section 5339 (These grants are managed by direct recipient in TrAMS.)

Federal Funding Accountability and Transparency Act Subaward Reporting System (FSRS)

After the execution in TrAMS of each FTA grant containing a subrecipient, the Grant Administrator will access <u>www.fsrs.gov</u> to report the subaward.

Grants & Policies

The policies and procedures of each grant are exclusive to its federal regulations, applicable NCDOT administrative processes, and internal Program Management Plans (PMP). PMPs describe the method and processes used by the MPO to solicit, select, award, and administer particular grants. These policies allow the MPO Board and TC to evaluate grant project proposals objectively while distributing funds amongst the entire UZA. The following section describes each grant, eligible projects, and reimbursement process in detail. The header of each grant shows the federal , state, or local match required .

STBG-DA

Federal FHWA 80% · Non-federal 20%

The Surface Transportation Block Grant – Direct Attributable (STBG-DA) Program are flexible federal-aid highway funds apportioned each fiscal year to North Carolina. STBG-DA requires a 20 percent local match and can be used for a variety of transportation projects and planning activities. NCDOT sub-allocates the funding to DCHC-MPO by formula based on the urbanized area (UZA) share of population measured against the population in all North Carolina UZAs with populations over 200,000. The MPO then receives its total grant figure and selects projects based on adopted policies.

Distribution

In 2015, the MPO adopted an annual funding proposal policy for the STBG-DA grant. Funds are distributed through a three step, partially competitive and non-competitive process. This process is based on the requirements of current transportation legislation, with additional guidance provided by the *MTP*, the MPO's long-range metropolitan transportation plan and other local comprehensive plans. Grant distribution begins with estimating the "expected" STBG-DA funding level. Average annual allocations from previous years and any prior year uncommitted balance are combined to calculate the expected funds. The expected funds are reduced by these items (approved annually during the UPWP process):

- 1. **TJCOG Planning** distributed to Triangle J Council of Governments for regional and statewide planning activities for MPO.
- 2. LPA Routine Planning funding levels vary depending on LPA needs, subject to UPWP approval.
- **3. LPA Extra Planning Needs** funding levels vary depending on LPA needs, subject to UPWP approval.

Grants | STBG-DA

Distribution (cont'd)

The remaining STBG-DA funds are allocated to specific categories and projects are approved during the MTIP process. See *Appendix <u>DCHC Federal Funds Policy #3</u>* for further detail on distribution. The remaining STBG-DA funds are distributed to three categories:

Local Discretionary – (50%) Distributed to participating members by a noncompetitive basis considering population, number of data collection sites, etc.

Transit – (25%) Distributed to 'direct recipients' in the MPO on a non-competitive split based on National Transit Database service and system data.

Regional Bike/Pedestrian – (25%) Competitive – for projects of regional scale and importance. All TAP funding will be programmed for projects in this category.

Grants STBG-DA

Programming & Eligible Projects

The MPO Board approves projects for STBG-DA funding based on a funding policy that gives priority to projects in the adopted DCHC Long Range Transportation Plan. Precedence is given to Public Transit, Bicycle and Pedestrian Facilities, Transportation System Management, Planning studies, and any future versions of plans (roadway projects are not included). Planning TIP projects follow the UPWP Development Schedule and Non-Planning TIP Projects go through the MPO Board approval process.

Projects that are submitted for funding requests are given priority separately according to their project groups. A summary of the project groups and criteria are located below.

	Routine Planning		Extra Pl	anning
Project categories nded annually	 New & existing LPA All Required planning activities 		 LPA Planning Special Emph 	asis Projects
	Transit	Bicyc	le & Pedestrian	Local Disc

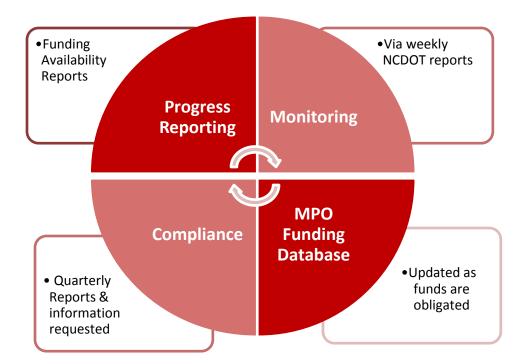
Projects selected through TIP process	 Bike/Ped projects Transit projects 		 Projects of regional scale or importance Minimum project size \$1,000,000 (Federal) 		 Large bike/ped projects Scenic/Environment enhancement to TIP projects Transit & planning projects
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funded

Grants | STBG-DA

Project Management, Compliance, & Monitoring

Compliance to Federal and State regulations for the STBG-DA grant is monitored through the Expensing Process, Progress Reporting, and updates to the **MPO Funding Database (MFD).** The MFD is updated as project changes occur, funds are obligated, or re-programmed. Weekly progress reports are also compiled to monitor funds. Updated reports are received weekly from NCDOT and obligation reports are updated through the MPO Funding Database. Details on grant compliance and monitoring policies can be found in the *Appendix <u>DCHC Sub-recipient Monitoring</u> <u>Policy & Procedures.</u>*



Project Management

Grants | Planning 104(f)

PL Section 104(f)

Federal FHWA 80% · Local 20%

Metropolitan Planning 104(f) funds are granted to MPOs for long-range transportation planning in urban areas. Each state receives an annual apportionment and the grant requires a 20 percent local match (from MPO or jurisdiction). With a formula approved by FHWA and the MPOs, NCDOT distributes the apportionment amongst the MPOs located in the state. Each MPO receives a base amount of \$130,000 plus an additional amount based on population.

Distribution

PL 104(f) grant activities must be included in the Unified Planning Work Program (UPWP). Each MPO/RPO in the state receives its base amount and a portion of any prior year unprogrammed balance per NCDOT formula. These funds are sub-allocated to the LPA to conduct required planning activities and tasks.

Grants | Planning 104(f)

Programming & Eligible Projects

Planning funds can be used for any transportation planning related activity or plan development (MTP, TIP, UPWP). Funds also cover the cost for modelers or consultants to complete Surveillance of Change tasks, environmental analysis and special studies, forecasting, short-range transit planning, incidental planning, Civil Rights Compliance, and Management & Operations activities.

Expensing & Reimbursement for STBG-DA and PL 104(f)

STBG-DA and PL funds are expensed and reimbursed in the same manner. STBG-DA/PL 104(f) funds are cost-reimbursable and requires that the MPO request reimbursement from NCDOT prior to releasing funds to sub-recipients. The local match of the grant is typically expended prior to any requests for reimbursement.

Quarterly reporting packets serve as the invoicing document for all grant funds. Subrecipients submit the reports for their jurisdiction and those expenses are combined into one **MPO Consolidated Expenditure Report**.

The following pages outline the STBG-DA/PL 104(f) expensing and reimbursement process in more detail.

Grants | STBG-DA & PL 104(f)

STBG-DA/PL 104(f) Expensing Process

<mark>1</mark> Sub-recipients	 Submit quarterly reporting packet to MPO. Include supporting documents, Expenditure checklist. See Appendix p.40 for <u>Reporting Requirements.</u> Reports due on 15th of month after Federal quarter ends.
<mark>2</mark> Grant Administrator	 Verifies that sub-recipient reports have required documents and that expenses are reimbursable. Consolidates all sub-recipient reports with LPA expenditures into single invoice for MPO to send to NCDOT/TPB for reimbursement. Sends invoices to Finance Dept. Grants Accountant for Financial Certification. Sends Narratives from sub-recipients to Transportation Manager for MPO-wide Narrative.
<mark>3</mark> Transportation Manager	 Writes narrative reports as Finance Department completes certification process.
4 Grant Administrator	 Compiles <i>MPO Consolidated Expenditure Report</i> (supporting documents and signed certification). Emails <i>MPO Consolidated Expenditure Report</i> to NCDOT-TPB. Report filed electronically on MPO's K-drive and hardcopy in grant binder. MPO and City of Durham Finance Dept. receive Remittance Advice via email (once funds are deposited). City of Durham Finance Department also receives notice.

Grants | STBG-DA & PL 104(f)

STBG-DA/PL Reimbursement Process

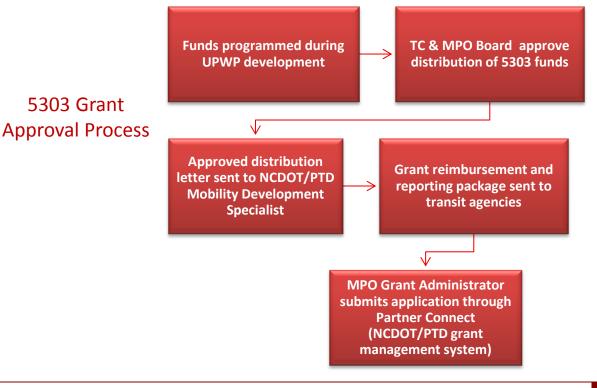
1 NCDOT-TPB	 Reviews <i>MPO Consolidated Expenditure Report</i> and uses it as an invoice for reimbursable expenses. Reimburses the MPO electronically (ACH deposit). Sends Remittance Advice to Grant Administrator via email.
2 Grant Administrator	 Processes Purchase Orders (POs) in MUNIS for sub-recipient reimbursements.
<mark>3</mark> Sub-recipients	Sent check via MUNIS Purchase Order.
<mark>4</mark> Grant Administrator	 Creates Local Match Worksheet (LMW), once all POs are paid out, for all subrecipients excluding the City of Durham Transportation Department and the Durham City/County Planning Department. Uses LMWs to manually record Local Matching funds in MUNIS. Drafts Journal Entries to capture 100% gross up of funds. Files LMWs and POs in grant folder on K drive.
	 Creates <i>LMW</i> for the City of Durham Transportation Department and Durham City/County Planning Department project expenses and create a <i>Journal Entry</i> after each quarterly report is submitted to record local matching funds in MUNIS.

Section 5303 Federal FTA 80% · State 10% · Local 10%

The Metropolitan Planning Program Section 5303 Grant funds urban public transit planning and technical studies in areas over 50,000 in population. Each state receives an annual apportionment from the FTA and the NCDOT Public Transportation Division sub-allocates the grant by formula to each MPO. Section 5303 funds are available for four years and require a state and local jurisdiction match of 10% each. The apportionment is based on a formula of each state's urbanized population in proportion to the urban population nationwide and other factors.

Distribution

DCHC-MPO distributes 5303 funds to transit operators within the MPO. The funds are programmed during the development of the UPWP, with GoDurham receiving 51% and Chapel Hill Transit receiving 49% of the grant. The TC and the MPO Board approve and authorize the distribution of 5303 funds prior to the release of funds from the FTA through NCDOT/PTD.



Programming & Eligible Projects

5303 funds are only available for planning and technical studies related to urban public transportation. DCHC-MPO provides grants management and oversight to transit operators receiving funds.

Expensing & Reimbursement

The reimbursement process for 5303 funds are similar to other grants in that invoices are submitted via quarterly reports. The reports include all required documentation and items on the *Timesheet & Expenditure Report Checklist*.

One of the major differences for 5303 funds is that transit agencies receive payment **prior** to the MPO collecting funds from NCDOT. GoDurham submits their own expenses via MUNIS and additional quarterly reports to the MPO. After the sub-recipients receive payment, a *Request for Reimbursement* form and supporting documents are submitted to NCDOT via the Partner Connect system.

Section 5303 Expensing Process

<mark>1</mark> Sub-recipients	 Submits quarterly report to MPO see <i>Appendix</i> p. 40 for <u>Reporting Requirements.</u> GoDurham records expenses. Include supporting documents, Expenditure checklist, and Allocation Table. Reports due on 15th of month after Federal quarter ends.
<mark>2</mark> Grant Administrator	 Verifies that sub-recipient reports have required documents and that expenses are reimbursable. Creates a PO for Chapel Hill Transit in MUNIS.
<mark>3</mark> Sub-recipients	• CHT is sent a check for their invoice amount. GoDurham receives their reimbursement electronically via MUNIS.

Section 5303 Reimbursement Process

1 Grant Administrator	 Creates Local Match Worksheet (LMW) and files in binder. Uses LMWs to manually record Local Matching funds in MUNIS. Drafts Journal Entries to capture 100% gross up of funds. Prints LMWs and POs and files hardcopies in the DCHC-MPO LPA grant binder. Notifies COD/Finance Dept./Treasury Division Analyst of request for reimbursement and provides O/O/Ps for deposit.
<mark>2</mark> Grant Administrator	 Grant Administrator submits Request for Reimbursement form in NCDOT Partner Connect. Submission includes Cover letter and Narrative Reports submitted by Chapel Hill Transit & GoDurham. Requests for Reimbursements submitted quarterly to NCDOT.
<mark>3</mark> Grant Administrator	 MPO receives total reimbursement electronically. MPO and City of Durham Finance Dept. receive Remittance Advice via email (once funds are deposited). City of Durham

Project Management, Compliance, & Monitoring

Compliance to Federal and State regulations is monitored through the expensing process and development of the UPWP. The distribution letter that is sent to NCDOT/PTD and then onto FTA is used to monitor the applications of transit agencies and serve as an additional oversight measure. Sub-recipients of the 5303 grant must also adhere to policies outlined in the <u>DCHC Sub-recipient</u> <u>Monitoring Policy & Procedures</u> found in the <u>Appendix</u>.

Finance Department also receives notice.

Section 5307 Federal FTA 80% · Non-Federal 20%

The Urbanized Area Formula Funding Program Section 5307 is an annual FTA grant to provide grants to UZAs for public transportation capital, planning, job access and reverse commute projects, as well as operating expenses in certain circumstances. Urbanized areas (UZAs) with a population of 50,000 or more can qualify for funding that is available for a total of four years. Section 5307 funds require a state and local match of 10% each. The Durham UZA has a population over 200,000 and has been designated as a transportation management area (TMA). Funds are apportioned directly to TMAs by a federal formula based on a combination of bus revenue vehicle miles, bus passenger miles, fixed guideway revenue vehicle miles, fixed guideway miles, population, and population density.

The MAP-21 legislation ended the Job Access and Reverse Commute (JARC) Section 5316 grant as a distinct program. JARC projects "support the development and maintenance of transportation services designed to transport welfare recipients and eligible low income individuals to and from jobs and activities related to their employment." Activities previously funded under JARC are eligible activities under the Section 5307 grant.

DCHC-MPO acknowledges the total apportionment for the Durham UZA and monitors the funds programmed for metropolitan planning and related activities. The accounting, expensing, and compliance oversight of capital and operating projects are the responsibility of transit agencies that are direct recipients of 5307 funding.

The 5307 apportionment formula includes a low-income tier that equals 3.07% of the total apportionment. The additional 3.07% of funding accounts for the JARC funding that has been consolidated into the program and should be used for transit activities that address the transportation challenges of low-income individuals.

Expensing & Reimbursement

The Designated Recipient of 5307 funds is the LPA/Durham UZA, however the transit agencies are the Direct Recipients. Direct Recipients receive funding directly from FTA, while designated recipients are primarily responsible for developing the program of projects for 5307 funds (via the UPWP and Transportation Improvement Plan). As the direct recipients, transit agencies must apply for funds, create budgets, secure approvals, conduct all oversight/compliance functions, and request draw-downs.

Distribution

DCHC-MPO provides general oversight to the Durham UZA apportionment through the development of the UPWP. The Durham TMA 5307 grant apportionment is divided amongst the transit agencies that are eligible direct recipients after NTD certified operational data and demographic data is entered into a formula by LPA staff. Annual apportionments and formulas can be found on the <u>FTA website</u>. The fund split recommendation is reviewed by transit agency staff and must then be approved by the TC and MPO Board.

Programming & Eligible Projects

Planning /Transit Studies

Eligible projects monitored by DCHC-MPO include all planning and transportation-related studies. Transit operators can apply funding to planning activities (which must be approved as part of the UPWP process) to capital expenditures, planning, and transit operations (in some instances).

JARC-eligible Projects

The direct recipients of Section 5307 funds may conduct JARC activities. Programming priorities for JARC-eligible projects are outlined in the Coordinated Public Transit-Human Services Transportation Plan.

Project Management, Compliance, & Monitoring

DCHC-MPO monitors compliance to Federal and State regulations via approval of the UPWP. The annual spilt distribution letter that is sent to the FTA is used to monitor the applications of transit agencies and serve as an additional oversight measure.

As the Designated Recipient, the MPO does provide oversight and monitoring of planning budgets. Transit operators are required to submit annual reports detailing planning expenditures, supporting documentation, and the balance of 5307 funds, see *Appendix* for the 5307 <u>Reporting Requirements.</u> The MPO Grant Administrator verifies that the Transit Agencies expenditures are consistent with tasks and amounts listed in the UPWP and the FTA TrAMS application.

Sub-recipients of the 5307 grant must also adhere to policies outlined in the <u>DCHC Sub-</u> <u>recipient Monitoring Policy & Procedures (Appendix)</u> and <u>DCHC Oversight Procedures for</u> <u>Section 5307</u>.

Section 5339 Federal FTA 80% · Local 20%

The Bus and Bus Facilities Section 5339 grant is an annual FTA grant. This program provides capital funding to replace, rehabilitate, and purchase buses. The grant can also be utilized for bus-related equipment and facilities.

Distribution

DCHC-MPO distributes 5339 funds to fixed-route transit operators within the MPO. The TC and MPO Board approve and authorize the distribution of 5339 funds with a split letter prior to the release of funds from the FTA.

Programming & Eligible Projects

5339 funds are only available for capital projects to replace, rehabilitate and purchase buses, vans, and related equipment, and to construct bus-related facilities. DCHC-MPO provides administrative support to transit operators receiving funds. Funds distributed under the FAST Act may be managed directly by the direct recipient rather than by the Designated Recipient for the direct recipient.

Section 5310 Funding varies based on project type

The Enhanced Mobility for Seniors and Individuals with Disabilities Section 5310 grant is an annual FTA grant. This program is intended to enhance mobility for seniors and persons with disabilities by providing funds for programs to serve the special needs of transit-dependent populations beyond traditional public transportation services and Americans with Disabilities Act (ADA) complementary paratransit services.

Project Selection

A competitive project selection process is utilized to distribute Section 5310 funds. Once every two years, the DCHC-MPO conducts a *Call for Projects* to solicit and receive applications for candidate projects. The Section 5310 Grant funds have two categories of projects and different eligible sub-recipients for each category. Not all sub-recipients are eligible for both Traditional and Non-traditional 5310 projects. Eligible sub-recipients include non-profits, state/local governmental authorities, and operators of public transportation services (including private operators and taxicab programs). Further details on the project selection process can be found in the <u>5310 Program Management Plan</u>.

Programming & Eligible Projects

5310 funds may be used for the planning, capital or operating costs of services and facilities that improve mobility for seniors and persons with disabilities. Projects should be derived from the most recently adopted Coordinated Public Transit - Human Services Transportation Plan Update (<u>CPT- HSTP</u>). The CPT-HSTP outlines a vision for improving mobility options for the disabled, aging, and low- income population living in the region.

Projects for 5310 are either Traditional 5310 Capital projects (including mobility management) or Non-traditional projects. Please see the 5310 PMP or Grant Application for more details .

Traditional Section 5310 Projects

At least 55% of total program funds must be used on *capital* projects that are public transportation projects planned, designed, and carried out to meet the special needs of seniors and individuals with disabilities when public transportation is insufficient, inappropriate, or unavailable. The 55 percent requirement is the minimum, however capital projects can utilize more of the apportionment if needed.

Non-Traditional Section 5310 Projects

Up to 45% of total program funds may be used for public transportation projects that exceed the requirements of the ADA, improve access to fixed route service and decrease reliance on paratransit service, or provide alternatives to public transportation that assist seniors and individuals with disabilities with transportation. The 45% is the maximum allowed for non-traditional projects and sub-recipients must clearly identify the project category in the 5310 grant application.



Expensing & Reimbursement

Invoices are submitted via quarterly reports for the reimbursement of 5310 funds. The reports include all required documentation and items on the *Timesheet & Expenditure Report Checklist*.



The sub-recipients receive payment **prior** to the LPA collecting funds from the FTA. The Grant Administrator creates a purchase order in MUNIS and sub-recipients are sent checks for the invoice amount.

Project Management, Compliance, & Monitoring

Compliance to Federal and State regulations is monitored through project selection, the expensing process, audits, and assessment of performance measures. Sub-recipients of 5310 grants must also adhere to policies outlined in the <u>DCHC Sub-recipient Monitoring Policy</u> <u>& Procedures found in the Appendix</u>.

5310 Grant Expensing Process

<mark>1</mark> Sub-recipients	 Submit quarterly reports to LPA, see <u>Reporting Requirements</u> in <i>Appendix</i>. Include Request for Reimbursement cover letter, supporting documents, and expenditure list. Reports due on the last day of month after Federal quarter ends.
<mark>2</mark> Grant Administrator	 Verifies that sub-recipient reports have required documents and that expenses are reimbursable. Creates Purchase Orders in MUNIS.
<mark>3</mark> Sub-recipients	 Sub-recipients are sent check s for their invoice amount. GoDurham receives their reimbursement electronically via MUNIS.

Section 5310 Reimbursement Process

1 Grant Administrator	 Creates Federal Financial Report (FFR) in FTA's TrAMS system. Submits draft FFR , Draw-down Request Form, and supporting documentation to Durham Finance Department for review.
<mark>2</mark> Finance Department	 Compliance Accountant reviews draft FFR, documents, and Draw-down Request Form. Finance Director certifies expenses/reimbursable amount.
<mark>3</mark> Grant Administrator	 Completes web-draw request via the ECHO system. Finalizes and submits FFR in the TrAMS System (due on the 28th of month subsequent to the quarter's end).
<mark>4</mark> DCHC-MPO	Receives reimbursement from FTA electronically.
5 Grant Administrator	 Creates Local Match Worksheet (LMW) and files in binder. Uses LMWs to manually record Local Matching funds in MUNIS. Drafts Journal Entries to capture 100% gross up of funds. Prints LMWs and POs and files hardcopies in the grant binder.

Project Management, Compliance, & Monitoring

Compliance to Federal and State regulations is monitored through project selection, the expensing process, audits, and assessment of performance measures. Sub-recipients of the 5310 grant must also adhere to policies outlined in the <u>DCHC Sub-recipient Monitoring Policy &</u> <u>Procedures found in the Appendix</u>.

CMAQ

Federal FHWA 80% · Local 20%

The Congestion Management and Air Quality Improvement Program (CMAQ) provides funding for projects and programs in air quality non-attainment and maintenance areas that reduce transportation related emissions (specifically ozone, carbon monoxide, and particulate matter). A 20 percent local match (from non-federal funds) is required and funds are available for fours years. Grants are apportioned each fiscal year from the federal government to states and funding is based on the population in non-attainment areas, maintenance areas, and the severity of air quality problems. North Carolina has six certified Air Quality Regions that can receive CMAQ funding (funding for statewide use is also available).

North Carolina's CMAQ apportionment is divided into three broad categories to provide better management of funds and to protect the state's obligation authority from future federal rescission of funding.

NC Funding Levels for CMAQ funds	Statewide 35% of apportionment*	 For large-scale improvements on statewide tier facility Administered by NCDOT & all or part of local match provided by NCDOT
	Regional 5% of apportionment*	 Only For AQ Regions, must be approved by all MPOs/RPOs in region, and be locally administered Projects should span more than one AQ region & MPOs responsible for local match
	Sub-Regional 60% of apportionment*	 Awarded to MPO/RPO level projects within AQ counties, administered locally Funding only to eligible MPOs/RPOs based on NCDOT formula

* Percentage of the total Federal apportionment for North Carolina

The CMAQ program is developed and administered locally to respond best to local and regional needs. Each program is different because no federal regulations exists were developed for how a CMAQ program should be structured at the state or MPO level. NCDOT has developed a formula for the distribution of funds amongst air quality (AQ) regions and statewide. It takes into account the population and air quality problems by county and then is summed by each county in the region to achieve the Regional Allocation for CMAQ funds. Additionally, DCHC-MPO has also developed prioritization criteria for assessing CMAQ applications prior to submission to NCDOT.

Distribution

CMAQ is a grant that employs a competitive project selection process. Once the DCHC-MPO receives notification of the Sub-Regional CMAQ Allocation, a *Call for Projects* is conducted with member jurisdictions to prioritize and submit candidate projects. The minimum project threshold is \$100,000 and the prioritization process coincides with development of the Transportation Improvement Plan (TIP).

Approval for CMAQ projects is a multi-agency process with variations based on the project's category. Regional CMAQ applications are agreed upon and submitted by partnering MPOs. Sub-regional CMAQ applications are prioritized by the MPO and ranked according to sub-regional needs, AQ emissions benefits, and/or priorities of the MPO.

DCHC Sub-regional CMAQ Project Approval Process

Applications for CMAQ projects are first received by the DCHC-MPO during the CMAQ *Call for Projects*. The TC Transit Sub-committee reviews and scores all applications according to guidelines approved by the MPO. Sub-committee recommendations are then reviewed by the full TC for recommendations to the MPO Board. The MPO Board has the final vote on the selection and prioritization of projects. CMAQ applications are submitted to the NCDOT-TIP Unit which supplies proposal feedback. Once all comments and issues are addressed by the MPO, candidate projects are submitted to NCDOT's Transportation Planning Branch (TPB) and Interagency Review Board. Projects approved by these agencies can be included in the Draft TIP.

Programming & Eligible Projects

The prioritization and evaluation of candidate projects is based on technical merits such as annual emissions reductions and a cost-benefit ratio. Projects are also generally selected to achieve distribution equity throughout the region. Federally eligible CMAQ categories include Capital Investments, Operating Assistance, Emission Reductions, and Planning & Project Development. The TC and MPO Board give funding priority to bicycle and pedestrian facilities, as well as public transit projects that reduce pollutants.

DCHC-MPO has approved funding for these types of CMAQ projects:



Expensing & Reimbursing

The CMAQ grant is cost-reimbursable and projects administered by the FHWA are managed directly by the jurisdiction awarded the grant.

CMAQ transit projects are flexed to the FTA under the 5307 grant program and are subject to 5307 management/oversight regulations.

Project Management

The DCHC-MPO follows a project management process that includes: planning, programming, monitoring/review, and evaluation. Various internal mechanisms have been designed to facilitate all project management functions and retain supporting documentation. Compliance to Federal and State regulations is monitored through the Expensing and Reimbursing Process and updates to the MPO Funding Database.

MPO Funding Database (MFD)

The purpose of this database is to ensure the timely use of all MPO managed funds (referred to as "MPO funds"). The MFD is updated as changes occur to track specific grant projects, programming, obligations, and project phases. Four (4) important goals of the database system are to:

- Implement approved qualified/quantifiable projects.
- Identify the reasons and accountability for, and possible solutions to, project delays.
- Ensure a consistent process is followed for any distribution of MPO funds.
- Ensure minimal impact to DCHC's Urbanized Area in the event of future rescissions of Federal funds.

Expensing & Reimbursing Process

Sub-recipients file quarterly reports that serve to explain their expenses, request reimbursement, and provide project statuses. Quarterly reports must include all items listed on the <u>Timesheet & Expenditure Report Checklist</u> (cover letter, detailed expenditure report, detailed progress report explaining specific tasks, financial certifications, etc). See *Appendix*, for the complete *Checklist*. It is important to note that grants may have different supporting document requirements and reimbursement processes. More information on specific processes can be found in the *Grants & Policies* section.

Project Management

Filing & Records Management

The administration of grants requires systematic records management with the flexibility for additions as grant regulations change. Records management includes the creation, receipt, maintenance, use, and disposition of records for operational business needs and to fulfill statutory requirements. The Grant Administrator has developed a customized record management system to address federal, state, and city provisions. Systematic records management allows the MPO to:

- · Conduct business in orderly, efficient, and accountable manner
- · Provide reports and perform project management functions
- Support decision making by TC, MPO Board, and LPA staff
- Ensure compliance of sub-recipients and meet regulatory requirements
- Protect future grant funding opportunities
- Conduct site visits of sub-recipients, as necessary
- · Support all necessary requests for annual audits

Reporting & Invoices

Hardcopies of sub-recipient and DCHC-MPO quarterly reports (which include requests for reimbursements and all supporting documentation for STBG-DA, PL and 5303 planning funds) are filed according to fiscal year in binders.

Obligation & Funding Reports

Obligation/Funding reports for STBG-DA grants are complied weekly and all other grants on a as needed basis. The MPO Funding Database allows for the most recent information on all grants to be displayed when requested by Board members and LPA staff.

Grant Project Folders (GPF)

Individual grant projects have folders which contain the GPO, Program of Projects, Resolution, Quarterly Reports, Invoices, and other documentation. Currently, GPF's are used for 5310.

Project Management

Documentation

Various types of documentation are needed for different agencies and phases of grant management. The Federal government requires that all required documentation is retained for three years after grant activity is complete. The City of Durham also requires documents be retained for 3 years after grant close-out.

<u>Financial Certifications</u>: Letters from Finance Directors certifying that the grant recipient has incurred reimbursable costs allowed by the grant agreement. These letters must be submitted every time grant funds are requested from NCDOT or FTA.

<u>UPWP Composite Report</u>: Year-to-Date quarterly expenses listed by Task Description and code. Report shows Federally reimbursable amount and remaining balance of award.

<u>Progress Report Narratives</u>: Task descriptions and detailed summaries of each activity to be reimbursed by grant funds. Narratives from sub-recipients and the Lead Planning Agency are combined into an MPO-wide Consolidated Expenditure Report.

<u>Expenditure Reports</u>: Detailed forms listing personnel, tasks, hours spent on each task, equipment or vehicle purchases, final invoice amount, etc.

<u>Consultant Payment Report</u>: The funds and services performed by consultants and contractors (invoices included).

<u>Grant Project Ordinance (GPO)</u>: Is the authorization by the City of Durham to accept funds for specific grant projects. GPOs must be approved by City Council and signed by the City Manager each year for individual grants. GPOs clearly identify projects, revenues, local matching funds, and sub-recipients.

Monitoring & Compliance

The DCHC-MPO is responsible for monitoring and ensuring compliance of sub-recipients as a designated recipient of Federal awards and function as a pass-through entity. Monitoring policies are fully explained in the <u>DCHC-MPO Sub-recipient Monitoring Policy</u> <u>and Procedures</u>, Appendix. The monitoring policy document was approved by the MPO Board and the four major requirements include:

- 1. <u>Award Identification</u>: Sub-recipients notified of Federal award information and any applicable compliance requirements.
- 2. <u>During-the-Award-Monitoring</u>: Ensuring that sub-recipients administer the federal award properly and that performance goals are achieved.
- 3. <u>Annual Audit Report</u>: Ensuring compliance to the annual audit requirement.
- 4. <u>Sub-recipient Audits</u>: Ensuring sub-recipients comply with annual audit requirement (if more than \$500,000 of Federal awards are expended in one fiscal year).
- 5. <u>Sub-recipient Sub-allocation</u>: If any portion of funds are sub-allocated by the subrecipient, it is required to pass down all reporting and monitoring requirements. The MPO should be provided all documentation related to the sub-allocation.
- 6. <u>Pass-Through Entity Impact</u>: DCHC-MPO will continually evaluate the impact of sub-recipients activities on the ability of DCHC-MPO to comply with Federal regulation.

Appendix

MPO-wide Expensing Process

General Process, see Grants & Policies Section for details on individual grants

Sub-recipients

- 1. Submit items on *Timesheet & Expenditure Report Checklist*.
- 2. Due quarterly, via schedule, on 15th of month subsequent to quarter end (Federal fiscal year).
- 3. Non-compliance procedures begin on the 6th business day after the deadline.
- 4. Invoice documents filed electronically and in fiscal year **DCHC-MPO/LPA Reporting & Invoicing** binder by sub-recipient.
- 5. Sub-recipients reimbursed according to grant regulations (receive reimbursement prior to MPO receiving funds for all grants expect STP/DA).

DCHC-MPO

- 1. Consolidated invoices sent to Transportation Manager/MPO Administrator and Finance Department to review and sign.
- 2. Invoices sent to Durham Finance Department Grants Accountant for certification and the Finance Director signs Financial Certification. The Transportation Manager writes narrative reports as the Finance Department completes certification process.
- MPO Grant Administrator compiles narratives, other documents, and signed certification into one *MPO Consolidated Expenditure Report*. Submits to NCDOT via Partner Connect or the FTA via TrAMS/ECHO by 30th of month. If delayed, NCDOT prefers that invoicing be completed by end of fiscal year.
- 4. Report filed electronically on MPO's K drive.
- Both MPO Consolidated Expenditure Report and Additional Items filed together in fiscal year DCHC-MPO/LPA Reporting & Invoicing or other appropriate grant binder (see Additional Items below).

MPO Consolidated Expenditure Report

STBG-DA/PL Requirements (sent to NCDOT)

- 1. Cover Letter (including request) & Financial Certification
- 2. MPO-wide Composite Expenditure Report
- 3. Progress Report Narratives
- 4. Consultant Payment Report (if applicable)

Additional Items

- 1. Member Agency invoices and financial certifications from sub-recipient finance directors
- 2. Quarterly Expenditures (pulled from MUNIS)
- 3. Drawdown request form with signatures of Transportation Department/MPO and Finance Director.

MPO-wide Expensing Process

Filing & Internal Documentation

- 1. MPO-wide Consolidated Expenditure Report invoices' NCDOT for expenses to be reimbursed. FFR invoices the FTA for cost-reimbursable expenses (ECHO draws down FTA funds).
- 2. NCDOT/FTA reimburses the total amount electronically. A Remittance Advice sent electronically from NCDOT to MPO Grant Administrator and Durham Finance Department who transfer funds to proper grant/project.
- 3. Member agencies reimbursed through Purchase Order process (via MUNIS) and sent check.
- 4. MPO Grant Administrator creates Local Match Worksheet (LMW) once all Purchases Orders are paid. Uses LMW to manually record Local Matching funds into MUNIS. Journal entries are records of Gross Up of local matching funds.
- 5. Local Match Worksheet, and Purchase Orders are printed and filed in grant binder or saved electronically to grant folder on K: drive.

Hardcopy Filing & Electronic Records

Grants management includes the updating and retention of various records and reports. The Grant Administrator maintains both hardcopy and electronic copies of quarterly reports, invoices, financial certifications, grant related correspondence from NCDOT and federal agencies, and MUNIS-related reports.

Hardcopy Binders (by fiscal year & grant type)

- 1. CMAQ
- 2. STBG-DA Obligation & Funding Reports
- 3. JARC, New Freedom, 5310, 5339
- 4. UPWP (STPDA, PL, & 5303)
- 5. Invoices/Quarterly Reports
- 6. Purchase orders

Binders are organized utilizing a hybrid NCDOT and DCHC-MPO coding method for the grant and year.

Binder Codes

Blue binders = Fiscal Year 2011 Red binders = Fiscal year 2012 Black binders = Fiscal Year 2013 Purple binders = Fiscal Year 2014 Multi-colored= Fiscal Year 2015

UZ = Planning Grant (UPWP, STBG-DA, PL) ex. 019 = year 2019, 020 = year 2020
UBF = 5339 grants ex. UBF15 = FY15
USP = Transit Planning Grant (5303)
88 = FY18
89 = FY19
90 = FY20
91 = FY21
LNF = New Freedom Grant, LNF14= FY14
LJA = JARC Grant, LJA14 = FY14
Capital Projects (DATA Projects)
91 = FY11

- **92** = FY12
- **93** = FY13
- **94** = FY14

Electronic Filing

- 1. Progress Reports (Weekly STBG-DA & CMAQ) uploaded to TIP Database to note obligation
- 2. Invoices, Purchase Orders, Expenditure Reports, Sub-recipients reports by fiscal year <u>K:\Planning\UPWP</u>
- 3. JARC/NF Call for Projects, Performance Measures, PMP, CPT-HSTP, Invocies, etc. <u>K:\Planning\JARC and New Freedom</u>
- 4. 5310, 5303 and other FTA grants <u>K:\Planning\Transit\Transit Funds</u>

Sub-recipient Reporting Requirements

Required Documents for Quarterly Reports/Packets by Grant Type

STBG-DA/ PL 104(f) Reporting Packet

- 1. Request for Reimbursement Cover Letter.
- 2. UPWP Composite Report.
- 3. Financial Certification.
- 4. Year-to-Date Quarterly Narrative.
- 5. Timesheet & Report Checklist
- 6. Expenditure Report
- All Supporting Documents

 (timesheets, receipts, and invoices paid).

Section 5303 Quarterly Report

- 1. Request for Reimbursement Cover Letter.
- 2. UPWP Composite Report.
- NCDOT-PTD Request For Reimbursement Spreadsheet & signatures.
- 4. Year-to-Date Quarterly Narrative.
- 5. Expenditure Reports
- All Supporting Documents

 (timesheets, receipts, and invoices paid).
- 7. DBE Forms

Section 5307 Oversight Report

- 1. Expenditure report Cover Letter.
- 2. UPWP spreadsheet.
- 3. Expenditure by task code.
- All Supporting Documents

 (timesheets, receipts, and invoices paid).

5310 Quarterly Report

- 1. Request for Reimbursement Cover Letter with expenditure report.
- 2. Quarterly Project Status Report.
- 3. Financial Certification.
- 4. Transit Administrator Certification
- All Supporting Documents (timesheets, receipts, and invoices paid).

UPWP Quarterly Expense Reports

Instructions for completing UPWP quarterly expenditure spreadsheets

- 1. Open file, enter Timesheet tab and enter either 1,2,3,4 in the yellow box at the top of the page titled "Current Quarter" to correspond with the quarter for which you are reporting.
- 2. Open Salary and Fringe tab and enter employee name, salary and employer-paid fringe per hour for each employee. Employer-paid fringe and salary must be derived from actual paid salary and fringe, not from the rates used for budget purposes.
- 3. Return to Timesheet tab, scroll to the right and in the timesheet for each individual, enter the number of hours worked on each task in the column titled "Hours" and colored blue. Enter expenditures for consultants on timesheet titled: Consultants/Capital/Operating. The data from the Timesheet tab will populate the expenses column of the Expenditures tab.

Enter employee name and supervisor name at the bottom of each time sheet. Scroll to the right to find additional timesheets as needed.

- 4. In cell A3 of the Timesheet tab, change the quarter and period of performance to those for which you are reporting. This will populate the quarter and period on other sheets.
- 5. Print a hard copy of timesheets from Timesheet tab and the Expenditures tab. Sign and date each timesheet. Mail along with all supporting documents and cover letter to MPO.
- 6. Save electronic file with the quarter in the title (ie. Q1, Q2) and email an electronic copy to <u>Margaret.Scully@durhamnc.gov</u>.

Amendments

In order to request an amendment, enter the Amendment tab. Scroll to the right to the second table and enter in the blue column titled "80% federal share" only the change in budget that you are requesting. The amount you enter will be added to, or subtracted from, your original budget to provide the budget after amendment.

If you require a second or third amendment, first highlight the column headers in between the amendment table #1 and the original budget. Next go to the Format tab at the top of the page towards the right-hand side. Under visibility, select Hide & Unhide. Click on the Unhide Columns tab. This should open up new amendment tables.

<u>Tips</u>

If the Expenditures to Date columns on the Expenditures 5303/5307/5309 tabs are not adding correctly, please do the following:

- Go to and click File then Options
- Then go to Formulas
- Confirm that "Enable iterative calculation" is checked, Maximum Iterations should be 100 and Maximum Change should be 0.001
- Click OK and see if problem is corrected, if not please email

Please do not change any other information on the spreadsheet, and contact Meg Scully if you need additional timesheets.

Checklist for Preparing UPWP Quarterly Reports (STBG-DA Funds)

Use this checklist as a guide when preparing your quarterly reporting packet for use of STBGP funds in the DCHC-MPO UPWP.

To update the excel spreadsheet with quarterly expenses, please follow specific instructions on the *UPWP Quarterly Expense Reports/Instructions for completing UPWP quarterly expenditure spreadsheets.* Note that his document is in each quarterly reporting template sent to jurisdictions and with the quarterly reminders sent via email by the MPO. It is also attached to this checklist.

CHECKLIST

Excel Spreadsheet of Expenses

- 1. Complete the excel spreadsheet as described in the specific instructions below. Remember to begin this process with the same excel file that was most recently sent to the MPO, whether for an amendment or the prior quarter's report. Use the template sent from the MPO if this is the first action taken under the current fiscal year's UPWP.
- 2. Confirm the following in the expenditures tab of the excel spreadsheet:
 - a. The programmed amount in the excel spreadsheet is correct and reflects any amendments that were submitted since the original UPWP approval.
 - b. There are expenses entered only in task codes for which there is an approved budget. (You may not spend funds for a task that has not been approved by the Board.)
 - c. The balance for each task code and the total is accurate. (ie. The balance equals the programmed amount minus the amount expended in each quarter. If there is an error, please refer to the tip on the bottom of the page of instructions for completing the excel spreadsheet. This is likely a circular referencing error in excel.)
 - d. There are no negative balances in the balance column, and there are no task codes for which over 100% has been expended. (You may not spend what you do not have.)
- 3. If you have entered consultant expenses in the consultant timesheet, please submit consultant invoices with your reporting packets with the expenses clearly identified on the invoices. If you have multiple invoices from consultants, please also provide a summary sheet that lists the amount of the individual invoice and the consultant name. The total on the summary sheet should equal the total of amounts on each invoice. If not, please provide an explanation on each invoice. (ie. If only a portion of the consultant's invoice is charged to this grant, then please indicate this on the invoice, and include only the amount on the summary sheet that is charged to this grant.)

Narrative of Work Performed in Quarter

1. In the word document, briefly describe the work performed under each task code for which expenses are entered in the excel spreadsheet.

- 1. Use the word document that was most recently sent to the MPO, whether for the prior quarter's report or an amendment. Use the template sent from the MPO if this is the first transaction since the approval of the UPWP.
- 2. The excel spreadsheet must match the word document (ie. If there is an expense in a task in the spreadsheet, there must be a description of the work performed in the word file. If there is no expense in the spreadsheet, there should be no description of work performed under the task.)

Cover Letter and Financial Statement

- Complete the cover letter with correct date, invoice number (ex. 1,2,3,4), correct quarter for which you are reporting (ex. 1,2,3,4), period of performance, correct amount of programmed funds (remember to change this to your amended amount after an amendment has been submitted), reimbursable funds, and match in both the body of the letter and the funding table inserted into the letter.
- 2. Ensure the calculations in the funding box on the cover letter are correct. The reimbursable amount minus the quarterly expenses to date should equal the balance. If not, please correct.
- 3. Ensure the financial certification has the correct period of performance, expense and reimbursable amounts.
- 4. Ensure the expended amount and the reimbursable amount on the letter are the exact same as the amounts on the financial certification.
- 5. Sign and date the cover letter and financial statement.

Transmittal

- 1. Send a single email to the MPO with your quarterly report including the following:
 - Single pdf with cover letter, financial certification, all tabs of the excel file (expenditures tab, timesheets tab, salary and fringe tab), description of work performed, relevant backup (consultant invoices, receipts, etc)
 - The word file with the narrative of work performed. (Your narrative will be merged with all other sub-recipients and the LPA in a single report.)
 - The excel file. (Your file will be linked with all other sub-recipients and the LPA to create a single expenditures report.)