

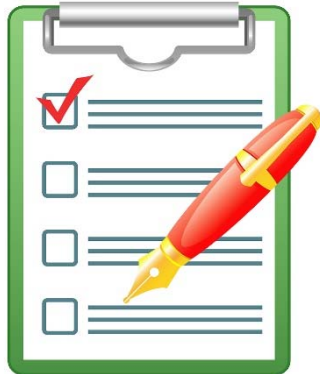


Georgia Department of Transportation

Risk Assessments

(September 2, 2020 - 1:30 PM)

Are we in compliance?



Why?

Our transit funding depends on it!

- “FTA is responsible for conducting oversight activities to ensure that **recipients of grants use the funds in a manner consistent with their intended purpose and in compliance with regulatory and statutory requirements.**” – FTA website
<https://www.transit.dot.gov/regulations-and-guidance/program-oversight/program-oversight>
- GDOT is FTA’s Grant Recipient and
- To demonstrate GDOT Compliance with regulations, GDOT must demonstrate compliance by it’s Subrecipients

How?

Risk Assessments

- Identify and
- Correct deficiencies on an on-going basis.
- PMs use the RA Tool during the RA interview.
- Demonstrate Oversight and Compliance to FTA during State Management Review



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What can I expect during a Risk Assessment?

- Project Managers (PMs) schedule and conduct an RA with each subrecipient.
- Ten Review Areas
 - Financial Management
 - Technical Capacity
 - Maintenance
 - Americans with Disability (ADA) – Regular
 - ADA Paratransit (Fixed-Route Systems)
 - Title VI (Civil Rights)
 - Procurement
 - Charter and School Bus
 - Drug & Alcohol
 - Section 5307 Requirements
- Each Review Area is Scored.
- All review areas are totaled, and sub-recipients are ranked Low-Med-High
- Based on scoring & other factors a few subs will receive a full review from RLS.



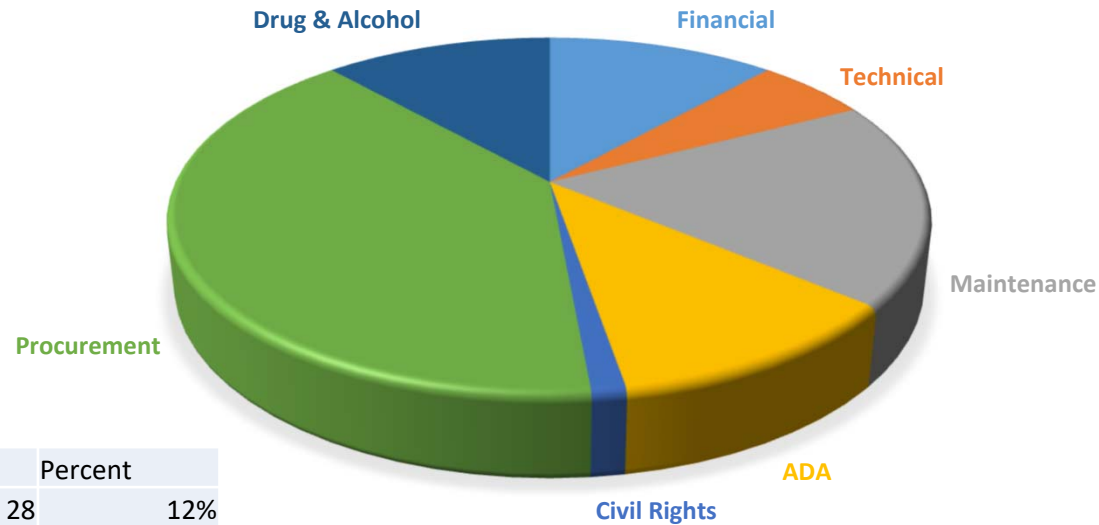
**Show RA
Tool &
Menti**



Georgia Department
of Transportation

Statewide Summary of Risk Assessments (Rural)

DISTRIBUTION OF RISK POINTS



	Points	Percent
Financial	28	12%
Technical	14	6%
Maintenance	45	19%
ADA	27	11%
Civil Rights	3	1%
Procurement	96	40%
Drug & Alcohol	28	12%
Total	241	100%

Note: ADA Paratransit & Section 5307 Requirements are N/A to Rural Systems and there were 0 points scored for school bus/charter.

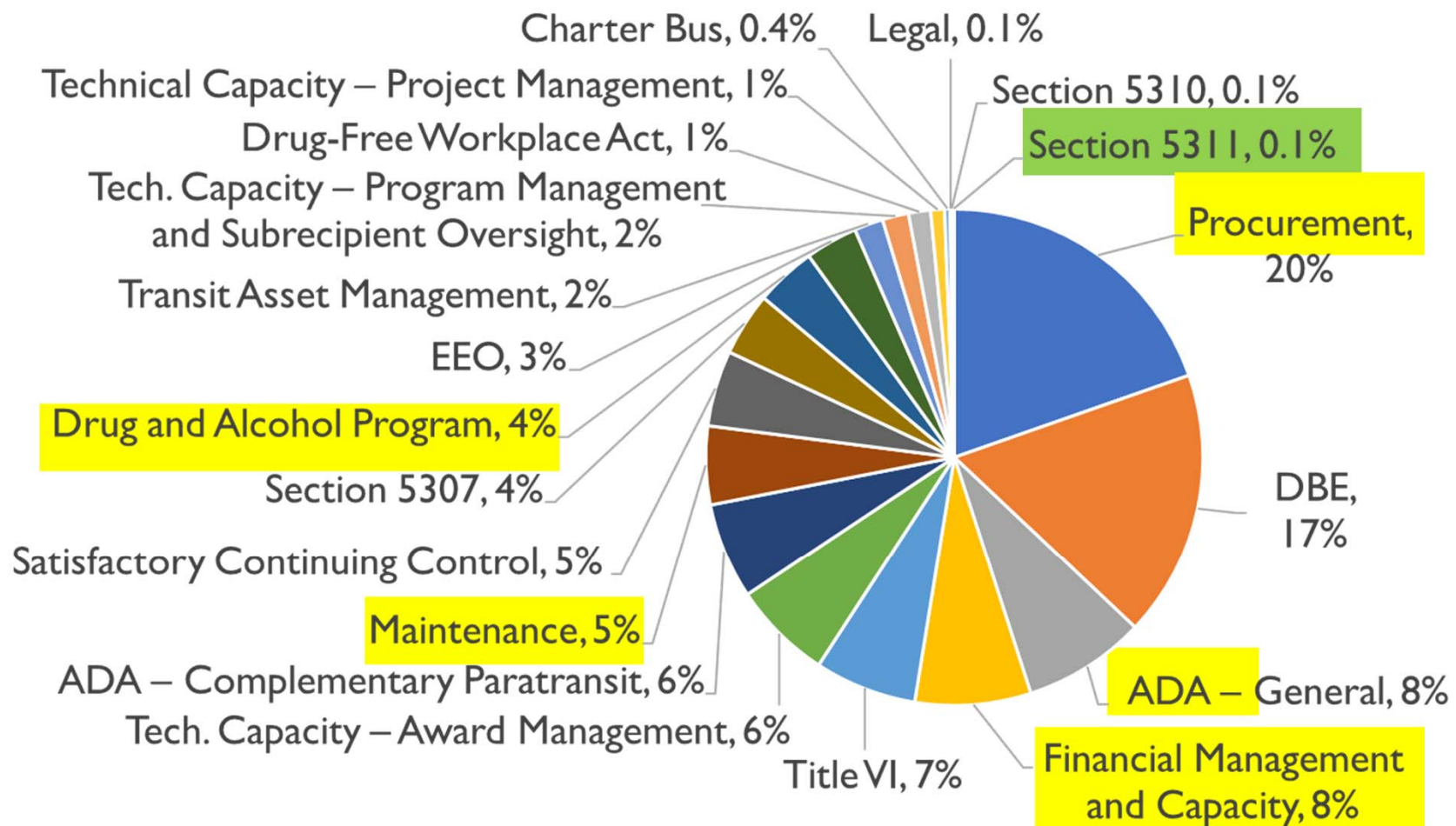
Statewide Risk Assessment Results (Rural)

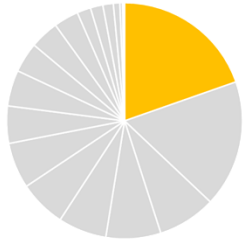
Rankings

Low (0-3)	Medium (4-11)	High (12+)
59	18	3

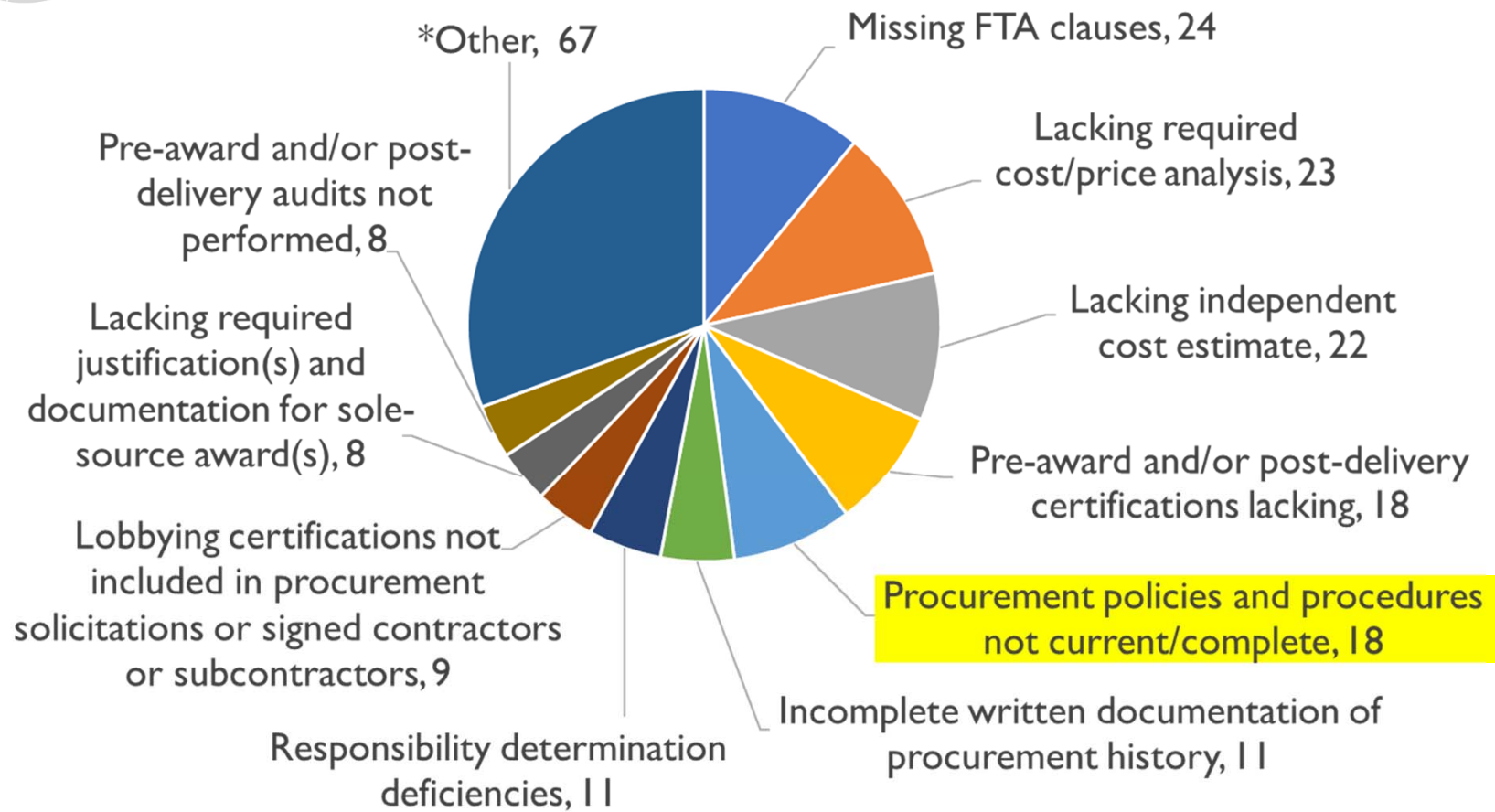


What are some common findings Nationally?





Procurement : 20% (National)



Procurement – Common Mistakes

GDOT Rural Programs – 40%

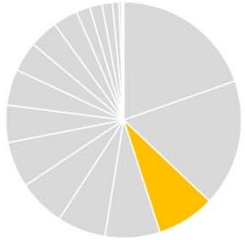
- No Procurement Policy available for review
- Having a Procurement Policy that did not include all the FTA Requirements and Thresholds
- The FTA thresholds were outdated

New Thresholds as of 2018:

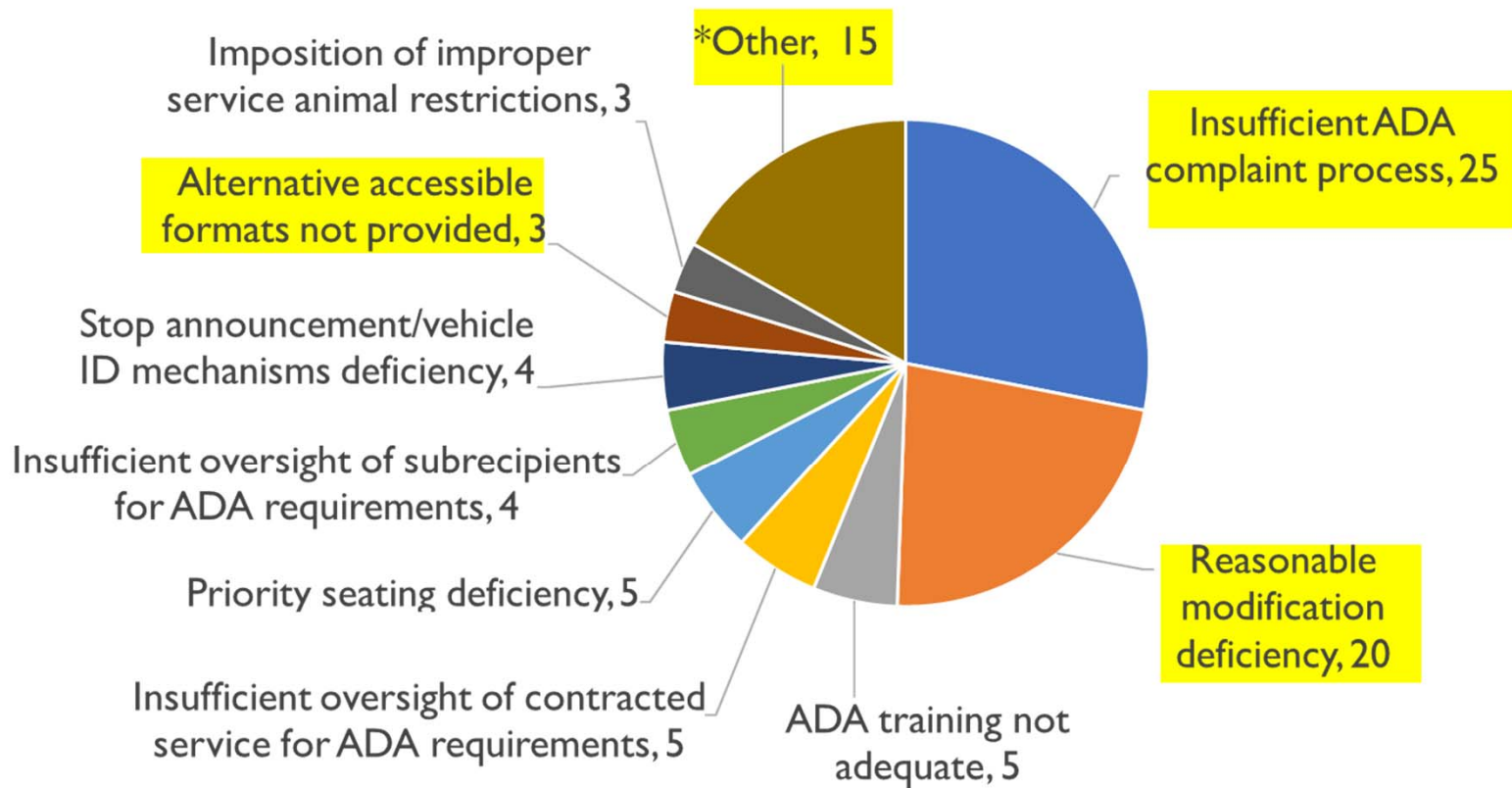
Micro-purchase - \$10,000 (formerly \$3,500)

Small purchase- \$10,001 to \$249,999

Simplified acquisition (SAT) - \$250,000 (formerly \$150,000).



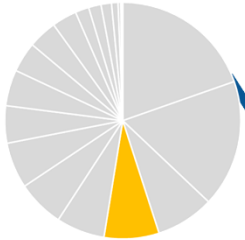
ADA - 8% (National)



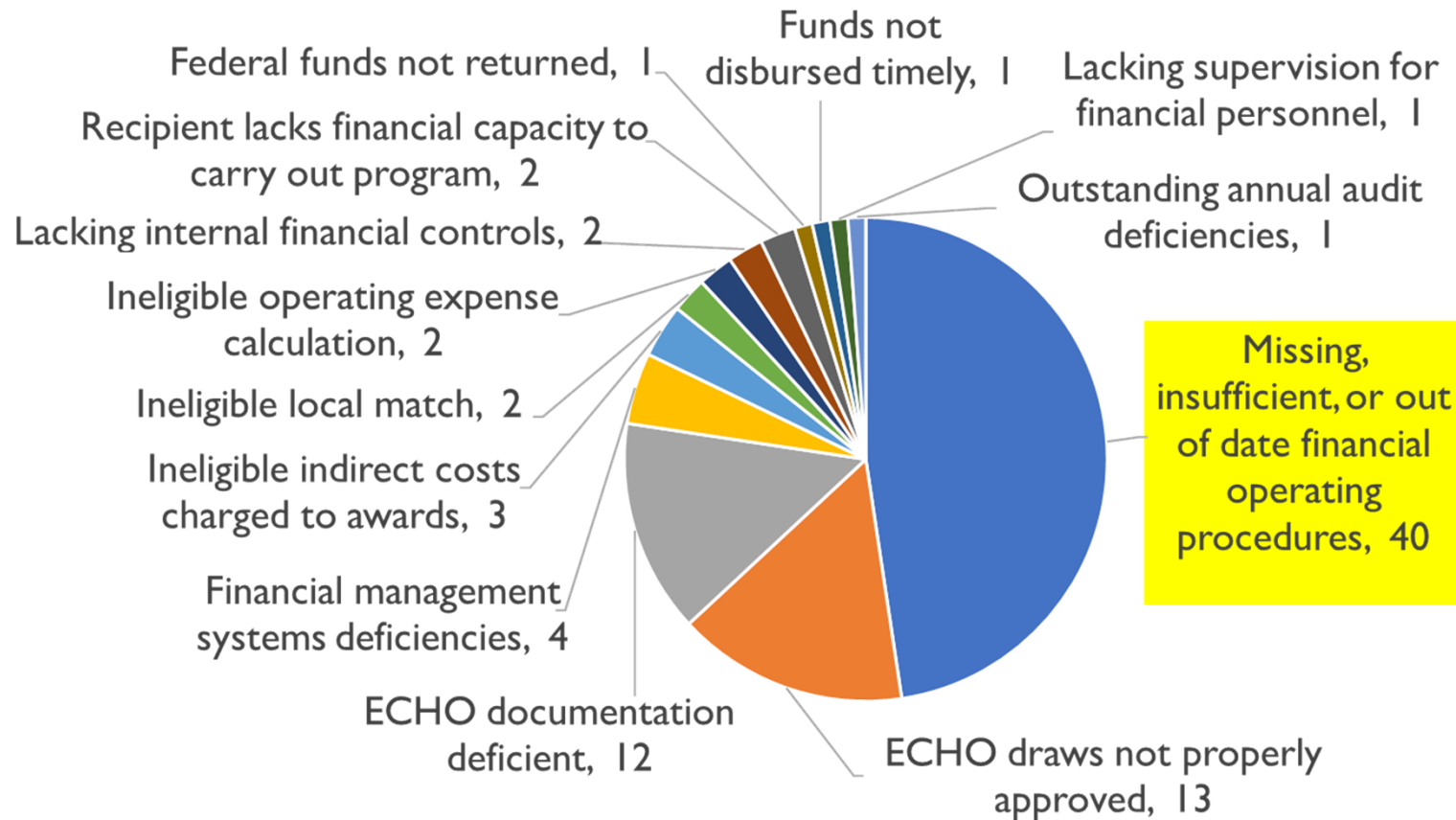
ADA – Common Mistakes

GDOT Rural Programs – 11%

- **No-Show Policy** : Either don't have a written no-show policy or the policy given is vague and/or fails to meet requirements.
 - FTA funded guidance available from the Disability Rights Education and Defense Fund (DREDF) at <https://dredf.org/ADAtg/noshow.shtml>
- **Complaint process** is incomplete
- **Trip Denial Policy** : Denial of trip policies not clearly defined.
- **Accessible Formats**: Important Information not provided in accessible formats (large print, audio, braille)
- **Reasonable modifications** either not made or advertised.



Financial Management & Capacity - 8% (National)



Financial – Common Mistakes

GDOT Rural Programs – 12%

- No written financial policy
- Inadequate financial policy
- Slow reimbursement Submittals



Maintenance

GDOT Rural – 19 %

- Incomplete Inventory
- Not making 80% on-time Maintenance
- Maintenance Plan not Provided



Drug & Alcohol – Common Mistakes

GDOT Rural Programs – 12%

- Inadequate training for new hires (lack of documentation)
- No documentation of on-going staff training.
- Certifications either not provided or outdated for:
 - Medical Review Officer,
 - Specimen Collectors, and
 - Substance Abuse Professionals
- Pre-employment process
 - Previous employer record checks
 - Documentation of Confirmed negative before assuming safety sensitive job.

Technical Capacity

GDOT Rural – 6 %

- Staff Vacancies
- Not enough staff assigned to work-load.



The Risk Assessment Process – FY 2020

How does it work?

- The Project Managers Completed the Initial RAs earlier in 2020
- Since then PMs have worked with subrecipients to follow-up on missing items or addressing outstanding items.
- Soon, the PMs will send each subrecipient a Findings Memo.
- The findings resolved after the initial RA will require no further action.
- The subrecipients will work with their PMs to draft a Corrective Action Plan (CAP) to address remaining issues.
- GDOT will review and accept the plan
- The Subrecipient will follow the CAP to close the findings.
- Subrecipient will receive a close out notice.

How can I keep from scoring high on the next RA?

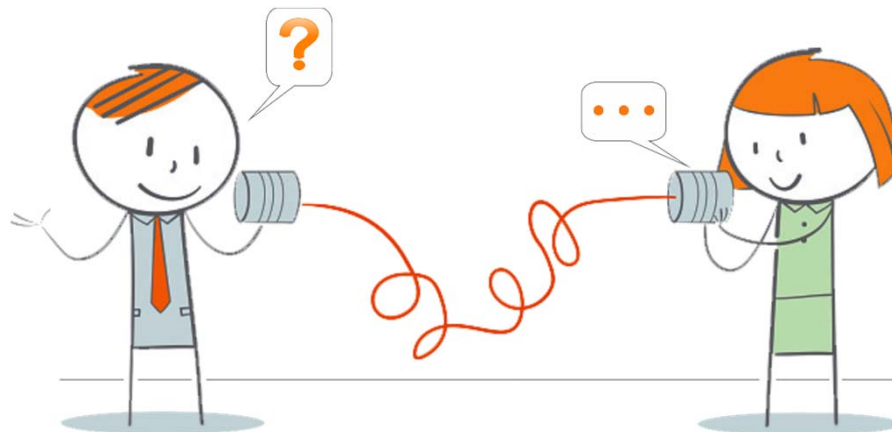
- Carefully read through your **Findings Memo**.
- Work with your PM to address identified deficiencies.
- **Develop a Corrective Action Plan (CAP)**
- Follow your CAP
- **Document** that you are following your CAP
- Next RA will be FY 2022



How can I keep from scoring high on the RA (continued)

Keep GDOT Informed! Notify your PM if:

- Planning to make a large purchase using FTA funds
- Planning to change your service fares or routes
- Planning to enter a TPO or other contract for services
- Updating your website
- If you have an accident involving a revenue vehicle
- Something happens to your drug and alcohol testing program
- Have any ADA or Title VI Complaints



Questions/Discussion

