

NO.	Topic	FTA Comments
1	Official Request Letter	<b>Complete – the letter was updated with correct POP – 3<sup>rd</sup> submittal</b>
2	Opinion of Counsel	Complete for ARP funds only – 1 <sup>st</sup> submittal <b><i>*Please be aware that if/when you decide to be a direct recipient for 5307, this process applies again.</i></b>
3	Authorizing Resolution	Complete for ARP and FY22 5307, will need revised for any other funding source – 1 <sup>st</sup> submittal
4	Financial Capacity Questionnaire	<b>Complete – Prior Audit concerns were addressed – 3<sup>rd</sup> submittal</b> <ol style="list-style-type: none"> <li>1. Question #3 - Need to describe how the County is addressing the material findings from your Audits. <ol style="list-style-type: none"> <li>a. 9/15/2023 - The prior information presented to FTA showed dates that the audit findings should have been resolved (7/2023), but nothing was submitted in this package to show that that was accomplished. Please send us that confirmation of audit closure. <ol style="list-style-type: none"> <li>i. 12/4/2023 – the 2021 Audit findings are resolved as noted in the 7/23 Corrective Action Plan based on information submitted on 11/17.</li> </ol> </li> </ol> </li> </ol>
5	Current Year Operating and Capital Budgets	<b>Complete – the budget including ARPA funds for 2024 was included in an email on 10/23/2023 – 3<sup>rd</sup> submittal</b>
6	Three Years of Single Audit Reports	<b>Complete – in 3<sup>rd</sup> Submittal</b> – Audits submittal complete, but information on Material Weaknesses shall be discussed in other submittal information as noted below: <ol style="list-style-type: none"> <li>1. A plan for resolving the material findings shall be submitted as part of your next submittal. <ol style="list-style-type: none"> <li>a. 9/15/2023 - Is there an updated Plan/document that resolves the Corrective Action Plan for 2021 Audit – the one submitted has completion dates 7/31/2023. <ul style="list-style-type: none"> <li>- #1 What is their plan to get the 2022 Audit in, in time? <ul style="list-style-type: none"> <li>• 12/4/2023 – Resolved, the 2022 Single Audit Report was submitted to FTA on 10/11/2023.</li> </ul> </li> <li>- #2 What’s the process for resolving accounts payables being recorded properly? <ul style="list-style-type: none"> <li>• In 12/15/23 Revised Financial Management Administrative Procedures document</li> </ul> </li> <li>- #3 What is the County’s process for preparing and reviewing that SEFA to ensure that expenditures are properly reported.</li> </ul> </li> </ol> </li> </ol>

		<ul style="list-style-type: none"> <li>In 12/15/23 Revised Financial Management Administrative Procedures document</li> </ul>
7	Policies and Procedures (14 areas)	<p><b>Complete – Please make required minor revisions to Procedures document</b> – no resubmittal necessary</p> <ol style="list-style-type: none"> <li><b>Complete</b> – Policies and Procedures are not in place for managing FTA Awards. There is no reference of 2 CFR 200, FTA Circular 5010, or FTA Circular 4220. 9/15/2023 – Repeat comment, these regulations are still not addressed. Comments were sent on 5/4/2023 on the Boulder County Grant Procedures document, the submittal in August did not address these issues. Please submit an updated policies or department level procedures document that addresses FTA grants.             <ol style="list-style-type: none"> <li>12/15/23 – Transit Award and Financial Management Administrative Procedures submitted on 11/17/23, updated on 12/15/23 with several fixes.</li> <li>These are “living documents” and can be revised as you work through grants management and knowing how your people will be actually doing this work, please keep up to date with that in mind in the future.</li> </ol> </li> <li>The general Boulder County policies note: <u>“Each Department or Office is responsible for financial compliance, reporting and programmatic grant management of all awarded federal, state and local grants. The Office of Financial Management Grants team is available to support departments, as needed.”</u> <ul style="list-style-type: none"> <li>Boulder County Transit Group needs to develop their own specialized Policies and Procedures based on the requirements of FTA’s programs (2 CFR 200, FTA C 5010 and FTA C 4220 and refer to the New Recipient Handbook that notes 14 areas that must be addressed). – 9/15/2023 - Repeat comment, no department level policies were submitted.</li> <li>Complete based on 12/15/2023 document</li> </ul> </li> </ol>
8	3-5 Year Financial Plan	Complete
9	Technical Capacity Questionnaire & Supporting Documentation	<p><b>Complete – Please make required minor revisions to Procedures document</b> – no resubmittal necessary</p> <ol style="list-style-type: none"> <li>Question #5 – Operating Services Oversight - please describe in detail the processes used to ensure the technical oversight of contractors and subrecipients providing operating services. 9/15/2023 – Repeat comment, a general county-wide subrecipient monitoring process was submitted but not a department-level meeting FTA requirements. Please submit an FTA subrecipient monitoring process.</li> </ol>

		<ul style="list-style-type: none"> <li>a. Department level Transit Award and Financial Management Administrative Procedures submitted on 11/17/23, updated on 12/15/23 with several fixes.</li> </ul> <ol style="list-style-type: none"> <li>2. Question #6 – Boulder County shall have policies and procedures which documents how they will oversee contractors and subrecipients and ensure they are in compliance with requirements, such as drug and alcohol testing, Title VI, etc. For example, the City of Boulder’s HOP service. Refer to CORTAP Manual. 9/15/2023 – Repeat comment. See CORTAP Manual page 18-1. <ul style="list-style-type: none"> <li>a. Resolved with 12/15/23 Procedures</li> </ul> </li> <li>3. Question #8 - Please provide details on how Boulder County will specifically conduct maintenance oversight of their contractors. 9/15/2023 – the question references CDOT’s Statewide Program for Small Agencies, please provide us a copy of this document. <ul style="list-style-type: none"> <li>a. Resolved with 12/15/23 Procedures</li> </ul> </li> <li>4. Question #10 – 9/15/2022 – FTA needs to see the final procurement policies and procedures with FTA requirements incorporated and how Boulder County will ensure they are followed. FTA recommends a supplemental FTA Procurement Policies as the current Policies do not reflect FTA requirements, see Procurement Policies section below. <ul style="list-style-type: none"> <li>a. Minor tweaks emailed on 12/7/2023 – no resubmittal necessary</li> </ul> </li> <li>5. Question #11 - Same comment as for Question #10 – need details and final document. 9/15/2023 – Recommend that Boulder County have FTA review the RFPs for services before they are published as current Procurement Policies do not reflect FTA requirements. <ul style="list-style-type: none"> <li>a. Complete</li> </ul> </li> </ol>
10	Organizational Chart	Complete
11	Procurement Procedures	Complete – Please make required minor edits to Transit Procurement Policies emailed on 12/7/2023 – no resubmittal necessary
12	Title VI Program Plan and Required Elements	Complete
13	DBE Program Plan (where applicable)	Complete
14	DBE Goal (where applicable)	Complete
15	ADA Policies and Procedures	Complete

16	EEO Plan (where applicable)	Not applicable – Boulder County is below the threshold based on what has been submitted
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