



# Florida Department of TRANSPORTATION

Office of Inspector General  
Kristofer B. Sullivan, Inspector General

DocuSigned by:

*Kristofer Sullivan*

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July 30, 2020

Audit Report No. 19I-9002  
Hillsborough Metropolitan Planning Organization

## What We Did

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The Florida Department of Transportation's (Department) Office of Inspector General (OIG) conducted an audit of the Hillsborough County Metropolitan Planning Organization (HCMPO), a District Seven subrecipient of the Department, to evaluate the Metropolitan Planning Organization's governance structure and associated cost allocation processes. This audit was conducted as a result of our fiscal year 2018-19 annual risk assessment and work plan.

The scope of this audit consisted of the fiscal year (FY) 2018-19 rate proposal submitted by HCMPO to the Department.

## What We Found

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For FY 2017-18, the Department approved an indirect cost rate of 30.08 percent for the HCMPO. However, for FY 2018-19, the Department requested HCMPO provide a greater understanding of what costs were included in the submitted rate, particularly those charged to HCMPO by its host entities, the Hillsborough County City-County Planning Commission (HCCC Planning Commission), and Hillsborough County.

When continued discussions did not resolve the Department's questions, HCMPO voluntarily adopted the 10 percent de minimis rate allowed under Title 2, Part 200, Code of Federal Regulations (C.F.R.), 200.414(f).

**We determined** HCMPO's revised 2018-19 indirect rate complied with the principles of 2 C.F.R. 200, since it adopted the de minimis rate allowed under 2 C.F.R. 200.414(f).

However, the methodology applied in the original 2018-19 indirect rate cost submission did not comply, for the following reasons:

- HCMPO reported separate rates for indirect and fringe costs. Vacation and sick leave costs were counted in both rates; and
- The rate calculation methodology is not fully documented by a complete and accurate procedure.

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As outlined in Observations 1 through 3, the cause of these deficiencies appears to be a combination of:

- Potential gaps and contradictions in HCMPO's original FY 2018-19 indirect rate calculation methodology (as described in Observation 1),
- The complexity of HCMPO's nested relationship with two hosting entities, (as described in Observation 2); and
- Inadequate definition of fiscal roles and responsibilities for HCMPO employees, (as described in Observation 3).

If HCMPO wishes to negotiate a rate with the Department in the future, it will need to address the potential barriers to communication with the Department outlined in Observations 1 through 3.

**What We Recommend**

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We **recommend** the Department's Office of Planning and Policy review the contents of this report, discuss them with HCMPO, and monitor any changes to its cost allocation procedures.

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## **BACKGROUND AND INTRODUCTION**

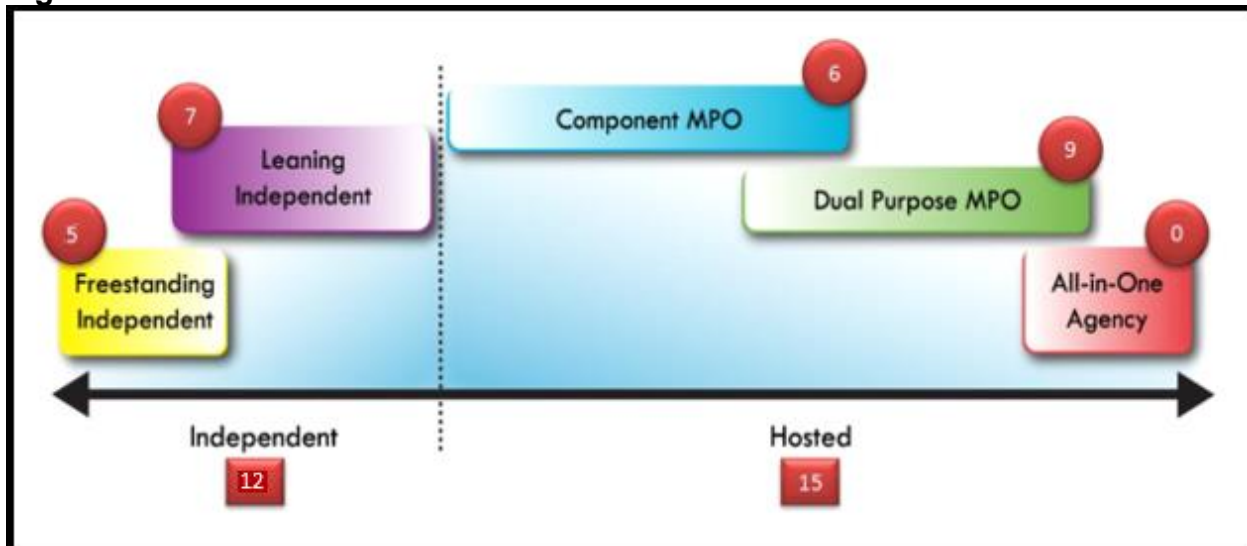
### **Metropolitan Planning Organizations**

In 1973, the Federal-Aid Highway Act mandated the creation or designation of Metropolitan Planning Organizations (MPOs) for urbanized areas with populations greater than 50,000 people. MPOs are federally mandated Transportation Planning Organizations (TPOs), comprised of representatives from local governments and transportation authorities, which help ensure federally funded transportation projects support local priorities. In Florida, MPOs may be referred to interchangeably as MPOs, TPOs, or Transportation Planning Agencies (TPAs).

There are 27 MPOs across the state of Florida. Typically, each MPO has been founded by an Interlocal Agreement, executed under Title XI, Chapter 163 of Florida Statutes, among the various county, city, and other local governments in the area to be served. Many MPOs also execute a separate service agreement with a participating local government to obtain administrative services or other support (e.g., office space), often at below-market rates. The terms of these arrangements vary widely.

In 2011, the Florida MPO Advisory Council (MPOAC) commissioned the Center for Urban Transportation Research (CUTR) at the University of South Florida to analyze the different organizational structures employed by Florida's MPOs. CUTR classified the MPOs into two categories, hosted and independent, and five subcategories, ranging from being fully independent (freestanding) to being so thoroughly integrated with the host agency that they are nearly indistinguishable from the host (all-in-one agency). Figure 1 illustrates the CUTR classification model, as applied to Florida's MPOs.

**Figure 1: MPO Structures**



Source: MPOAC: A Snapshot of Florida MPOs (prepared by the Center for Urban Transportation Research [CUTR], April 2011); modified by the Office of Inspector General (OIG) to include the newest MPO, Heartland Regional TPO.

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The Florida Department of Transportation's (Department) Office of Planning and Policy (OPP) uses the CUTR model to classify MPO governance structures.<sup>1</sup>

### **Hillsborough County MPO**

Originally founded as the Tampa Urban Area MPO in 1974, today the Hillsborough County MPO (HCMPO) coordinates transportation planning for the cities of Tampa, Temple Terrace, Plant City, and unincorporated Hillsborough County. HCMPO's Board appoints the MPO's Executive Director, who reports functionally to the Board. However, HCMPO obtains additional personnel, furniture, equipment, and facilities from its host entity, the Hillsborough County City-County Planning Commission (HCCC Planning Commission), under the terms of the staff services agreement between them. The HCMPO Executive Director reports administratively to the HCCC Planning Commission (Commission) and participates in the Commission's hiring of shared planning staff members.

Under the CUTR model, HCMPO best fits the description of a Dual Purpose (hosted) MPO, which shares staff members with its host entity. Under this arrangement, the host entity leverages the MPO's federal grant funds to pay for the transportation portion of its overall planning duties.

### **HCCC Planning Commission**

The HCCC Planning Commission oversees the comprehensive planning process for all public development (capital improvements) to be completed in Hillsborough County and its member communities. The Commission consists of four members each appointed by governing bodies of Hillsborough County and the City of Tampa; as well as one member each per additional municipality located in Hillsborough County.

In addition to administratively hosting the HCMPO, the Commission hosts the Hillsborough River Interlocal Planning Board (River Board), which plans maintenance and development for the Hillsborough River Corridor.<sup>2</sup> The Commission also has review and approval rights over plans prepared by various independent local planning authorities serving Hillsborough County, including the Tampa Sports Authority, Hillsborough County Aviation Authority, Tampa Port Authority, and others.

The Commission independently appoints an Executive Director, who in turn hires employees to carry out the Commission's work as needed. By law Hillsborough County (County) must provide the Commission's office space and allow the Commission's employees to participate in the County's civil service system.<sup>3</sup> Therefore, while the

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<sup>1</sup> The MPO Program Management Handbook published by OPP includes a discussion of the model.

<sup>2</sup> Per terms of Chapter 86-355, Laws of Florida. The corridor includes a length of river travelling through Hillsborough County and all land within 500 feet of either bank.

<sup>3</sup> Per terms of Chapter 97-351, Laws of Florida.

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HCMPO is administratively hosted by the HCCC Planning Commission, the Commission is administratively hosted by Hillsborough County.

### **Plan Hillsborough**

Hillsborough County publicizes the consolidated planning efforts of the HCCC Planning Commission, HCMPO, and River Board under the umbrella name “Plan Hillsborough.” Although Plan Hillsborough’s website describes itself as a staffing agency serving all three entities, it does not exist as a legally separate entity from any of them.

Instead, Plan Hillsborough is Hillsborough County’s means of engaging the public on a single front, using an integrated web page, regarding the planning efforts carried out by County employees through these related organizations. See our depiction of Plan Hillsborough’s organizational chart in Attachment 1 on page 17.

### **Shared Staffing Costs**

Some of the planners employed by the HCCC Commission are considered dedicated (100 percent allocable) to HCMPO or River Board. Others share their time between programs, and track time spent on capital project (Commission), transportation (MPO), or river planning (River Board). Personnel costs for these employees are pro-rated based on hours worked by function, as reported on timesheets.

### **Indirect Costs**

Title 2, Code of Federal Regulations (C.F.R.), 200.56 defines indirect costs as:

...those costs incurred for a common or joint purpose benefitting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved.

The key difference between a joint (shared) direct cost and an indirect cost is what a grantee considers “effort disproportionate to the result achieved.” For example, some grantees may wish to issue copier codes to employees to track printing costs by function to allow subtotaled costs by copy count to be direct billed. Other grantees may classify total printing costs as indirect to avoid the administrative burden.

To reduce the administrative burden for grantees, federal regulations allow indirect costs to be recovered by means of an indirect rate. The regulations allow grantees a great deal of flexibility in determining which costs to classify as direct, joint (shared) direct, or indirect, so long as each grantee follows its own procedures consistently:

However, typical examples of indirect costs may include certain state/local-wide central service costs, general administration of the non-Federal entity accounting and

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personnel services performed within the non-Federal entity, depreciation on buildings and equipment, the costs of operating and maintaining facilities.<sup>4</sup>

For fiscal year (FY) 2017-18, the Department approved an indirect cost rate of 30.08 percent for the HCMPO. However, for FY 2018-19, the Department asked for further clarification regarding HCMPO's governance structure, including the relationships between Hillsborough County, the HCCC Commission, and HCMPO. The Department sought greater understanding of how costs were charged between the related entities, and what costs were being included by HCMPO in its rate.

When continued discussions did not resolve the Department's questions, HCMPO voluntarily adopted the 10 percent de minimis rate allowed under 2 C.F.R. 200.404(f). HCMPO has yet to evaluate the fiscal impact of its decision to adopt the de minimis rate (per federal regulations, it is applied to a different base than HCMPO's calculated rate).

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<sup>4</sup> 2 C.F.R. 200, Appendix VII—States and Local Government and Indian Tribe Indirect Cost Proposals, Section A—General, paragraph 4.

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## **RESULTS OF REVIEW**

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Our objective was to determine whether the host entity properly allocated costs to the Department-funded planning programs managed by HCMPO, in accordance with the principles of 2 C.F.R. 200.

### **Finding 1 – Compliance with 2 C.F.R. 200**

**We determined** HCMPO's final revised 2018-19 indirect rate complied with the principles of 2 C.F.R. 200, since it adopted the de minimis rate allowed under 2 C.F.R. 200.

The methodology applied in the original 2018-19 indirect rate cost submission did not comply with 2 C.F.R. 200 for the following reasons:

- HCMPO reported separate rates for indirect and fringe costs. Vacation and sick leave costs were counted in both rates; and
- The rate calculation methodology is not fully documented by a complete and accurate procedure.

2 C.F.R. 200.403—Factors affecting allowability of costs states:

...[C]osts must meet the following general criteria in order to be allowable under Federal awards...

- (d) Be accorded consistent treatment...
- (g) Be adequately documented.

As outlined in Observations 1 through 3, the cause of these deficiencies appears to be a combination of:

- potential gaps and contradictions in its original FY 2018-19 indirect rate calculation methodology (Observation 1).
- the complexity of HCMPO's relationship with two hosting entities (as described in Observation 2); and
- inadequate definition of fiscal roles and responsibilities for HCMPO employees (Observation 3).

If HCMPO negotiates a rate with the Department in the future, it will need to address the issues outlined in Observations 1 through 3. Alternatively, HCMPO could adjust its cost classification procedures to ensure the de minimis rate results in a more accurate recovery of costs.

We **recommend** OPP review the contents of this report, discuss them with HCMPO, and monitor any changes to its cost allocation procedures.



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**Observation 1 – Rate Development Methodology**

We observed HCMPO's original FY 2018-19 indirect rate cost proposal:

- is not supported by clearly written procedures;
- uses atypical cost classifications:
  - Due to unrecorded subsidies by HCMPO's host entities, many typical indirect costs are not counted in the rate, while
  - Typical joint (shared) direct costs are classified as indirect;
- does not include prior year variances between actual and applied costs; and
- contains contradictory information regarding the treatment of fringe costs.

*Rate Methodology*

HCMPO's support for its FY 2018-19 indirect cost proposal consists of the proposal itself, which contains some explanatory notes about the procedure followed to calculate the rate. The Office of Inspector General reperformed the rate calculation and found the notes contained some gaps and contradictions compared to the actual process applied, which we had to recreate through a process of trial and error compared to the notes.

*Atypical Cost Classifications*

Federal regulations allow costs that can be easily pro-rated based on a causal relationship to be classified as joint direct costs. For example, many nonprofit organizations allocate a portion of benefit costs to direct labor hours worked by program based on the ratio of program hours to total hours. Under this scenario, only the benefit costs allocable to administrative labor hours would be recorded to the indirect cost pool. Although federal regulations allow a great deal of flexibility to local entities in classifying costs as indirect or direct (so long as the chosen classifications are consistently applied), the practice of direct allocating the benefit load of direct labor costs is common.

In contrast, HCMPO:

- did not record or charge indirect labor costs (or the related benefit load), having received all its administrative support services from its host entities as unacknowledged subsidies; and
- classified the benefit load of direct labor as an indirect cost.

These atypical practices hindered HCMPO's ability to communicate with the Department in terms that could be easily understood.

HCMPO's approach to classifying costs as indirect increases the risk the de minimis rate will not result in full recovery of costs on its behalf. During our testing, we

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recalculated HCMPO's FY 2018-19 indirect rate without including the paid leave and other benefit costs originally included in the submitted cost proposal. The resultant rate decreased from 30.08 percent to 10.34 percent.

*Prior-Year Variance Not Included*

To ensure costs true up over time, federal regulations require grantees to include the variance between actual indirect costs and those reimbursed by means of a pre-approved rate to be carried forward to the next period's rate calculation.<sup>5</sup> This step does not appear to be included in HCMPO's FY 2018-19 rate calculation.

*Inconsistent Treatment of Fringe Costs*

Regarding fringe costs, the explanatory notes in HCMPO's FY 2018-19 rate calculation state "fringe benefits follow the salary and wages and are assigned to the federal awards in the same manner." Since salary and wages are allocated based on timesheet hours reported by function, this statement implies fringe benefits are also pro-rated in real time based on hours charged.

However, the FY 2018-19 rate proposal:

- contains a separate calculation of a fringe rate without explanation or request for approval; and
- includes the cost of vacation and sick leave in both the fringe and indirect rates.

If HCMPO wishes to use a rate to recover both fringe and indirect costs, it must seek approval for the combined rate, and only count vacation and sick leave once within this combined rate. If instead it chooses to treat fringe costs as shared (joint) costs, it should still exclude all fringe costs, including vacation and sick leave, from the calculation of the indirect rate.<sup>6</sup>

If HCMPO chooses to treat fringe costs as shared (joint) costs, and applies this treatment consistently, it may be able to bring indirect cost amounts more closely in alignment to cost recoveries allowed by the de minimis rate.

The Department should monitor any changes to HCMPO's cost allocation procedures.

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<sup>5</sup> See 2 C.F.R. 200 Appendix VII Paragraph B.5, noting that the option of a predetermined rate is only available to grantees receiving funding directly from a federal agency, not a pass-through entity.

<sup>6</sup> See 2 C.F.R. 200.431 Compensation—fringe benefits. Paragraph (b) discusses equitable practices for the allocation of paid leave. Paragraph (c) describes other types of benefit costs as "chargeable...as direct **or** indirect costs in accordance with the non-Federal entity's accounting practices." [*emphasis added*]

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**Observation 2 – Complex Governance Structure**

We observed the CUTR model used by the Department is not sufficiently complex to describe HCMPO's governance structure, since it does not:

- Anticipate tiered relationships among multiple hosting entities. HCMPO participates in a double-nested hosting structure, whereby the County hosts the Planning Commission, which hosts the HCMPO.
- Distinguish between active and passive hosting relationships. For example, while Hillsborough County allows the HCCC Planning Commission, and by default HCMPO, to use its facilities and civil service, accounting and other support systems, it does not track these costs to the Commission, resulting in unrecorded subsidies.<sup>7</sup> Similarly, the HCCC Planning Commission does not track additional administrative support costs provided directly by the Commission to HCMPO. This arrangement can be characterized as a limited form of hosting which only offers partial benefits to the MPO. To distinguish between full and partial hosting arrangements, in this report we have chosen to call them active and passive relationships.

OPP should consider updating the CUTR model to include additional dimensions, and use these dimensions to better understand the legal, financial, administrative, and/or budgetary relationships of Florida's MPOs with related parties.

**Observation 3 – Definition of Fiscal Roles and Responsibilities**

We observed HCMPO has not adequately defined roles and responsibilities to perform grant-specific fiscal compliance duties, such as development of an indirect rate cost procedure and rate submission.

The United States Government Accountability Office's Standards for Internal Control in the Federal Government<sup>8</sup> states:

**3.07** Management considers the overall responsibilities assigned to each unit, determines what key roles are needed to fulfill the assigned responsibilities, and establishes the key roles.

Currently, HCMPO relies on the administrative support provided by its host entities, including:

<sup>7</sup> While the County retains a consultant, Maximus, to annually prepare a detailed central service cost allocation plan, it only uses the plan for informational purposes, without applying it to accounting entries. Centralized service costs have not been included in the HCCC Planning Commission's component unit column of Hillsborough County's financial statements.

<sup>8</sup> 2 C.F.R. 200.303 Internal Controls references this guidance, which is popularly referred to as the Green Book.

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- The Planning Commission's Finance Manager prepares and submits HCMPO's grant budget (UPWP) to HCMPO's Board for approval. This is not a full cost budget, since it does not include administrative costs absorbed on HCMPO's behalf by its host entities. The UPWP merely ensures HCMPO's dedicated grant funds get expended. The Finance Manager also prepares HCMPO's payroll and other payables for the County to process.
- The County processes payroll and other payments, using county-wide procedures. It prepares annual financial statements for the County, which disclose the Commission as a component unit.<sup>9</sup> It does not prepare separate financial reports for the Commission or HCMPO to review but allows access to its accounting system.<sup>10</sup>

As discussed in Observation 1, HCMPO's cost allocation procedures need to be carefully evaluated and adjusted. If HCMPO wishes to continue to use the de minimis rate, it may wish to reclassify fringe costs as joint direct costs, a type of cost not currently contemplated by its procedures. If it wishes to return to the practice of submitting a customized rate for approval, the deficiencies in its former practices described in Observation 1 must first be corrected.

To fully understand either course of action would require knowledge of cost allocation concepts and terms defined in federal regulations in reference to a full cost budget. The current level of administrative support for fiscal compliance available to HCMPO from its host entities may not be adequate for HCMPO to address these needs.

OPP may encourage HCMPO to obtain additional assistance when evaluating its indirect cost procedures going forward, whether from its host entities or external sources. The dedicated accounting resource being developed by the MPOAC may be a cost-effective resource for this need.

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<sup>9</sup> For fiscal year 2018-19, HCMPO will also be disclosed as a component unit due to a new (tax) revenue source.

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**APPENDIX A – Purpose, Scope, and Methodology**

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The **purpose** of this engagement was to evaluate the MPO’s organizational structure and its cost allocation methodology.

The **scope** of this audit included Federal Transit Administration and Federal Highway Administration funded contracts with the MPO from July 1, 2016, through June 30, 2020.

The **methodology** included:

- Reviews of statutes, regulations, policies and procedures:
  - Uniform Grant Guidance (2 C.F.R. 200);
  - Department’s MPO Handbook; and
  - State statutes.
- Documentation reviews:
  - Hillsborough County MPO’s board meeting minutes;
  - Interlocal Agreement;
  - Staff Services Agreement;
  - By-Laws;
  - Hillsborough County Civil Service Rules;
  - Plan Hillsborough Policies and Procedures;
  - MPO Agreements, Contracts G0D06 and G0W71;
  - Supporting documentation for expenses billed to the Department;
  - Single Audit Reports for Hillsborough County, 2017 and 2018; and
  - Hillsborough MPO Unified Planning Work Program, FYs 2017-18 and 2018-19.
- Interviews with staff members:
  - District Seven;
  - OPP;
  - HCMPO;
  - HCCC Planning Commission; and
  - Hillsborough County.

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APPENDIX B – Affected Entity Response



**Hillsborough MPO**  
Metropolitan Planning  
for Transportation

July 14, 2020

- Commissioner  
Lesley "Les" Miller, Jr.  
Hillsborough County  
MPO Chairman
- Commissioner Pat Kemp  
Hillsborough County  
MPO Vice Chair
- Paul Anderson  
Port Tampa Bay
- Councilman Joseph Citro  
City of Tampa
- Michael Maurino  
Planning Commission
- Commissioner Ken Hagan  
Hillsborough County
- Mayor Andrew Ross  
City of Temple Terrace
- Joe Lopano  
Hillsborough County  
Aviation Authority
- Mayor Rick A. Lott  
City of Plant City
- Councilman  
Guido Maniscalco  
City of Tampa
- Adam Harden  
HART
- Commissioner  
Kimberly Overman  
Hillsborough County
- Commissioner  
Mariella Smith  
Hillsborough County
- Cindy Stuart  
Hillsborough County  
School Board
- Councilman John Dingfelder  
City of Tampa
- Joseph Waggoner  
Expressway Authority
- Beth Alden, AICP  
Executive Director

Mr. Tim Crellin  
Deputy Audit Director for Intermodal  
Florida Dept. of Transportation (FDOT)  
605 Suwannee Street, MS 44  
Tallahassee, FL 32399-0450

RE:       OIG Assignment 19I-9002

Dear Tim,

Thank you for talking with us and our colleagues at FDOT District 7 about the best ways to document overhead costs that are eligible to be charged to federal grants for metropolitan transportation planning. We appreciate the detailed report and review of cost allocation procedures, and your advice and guidance about the various methods of recovering overhead costs.

Since your report does not state it, I want to clarify that the Hillsborough County City-County Planning Commission, which provides staff to the Hillsborough County MPO Board, has a detailed staff time tracking software. The software allows hours to be charged to tasks in the MPO's adopted Unified Planning Work Program (UPWP), or to tasks in the Planning Commission's work program. Tying staff hours to deliverables identified in the MPO grant agreements, the software allows our consolidated planning agency to easily track and allocate staff time to the appropriate funding sources.

I also want to highlight one of the points you made to us verbally, that the MPO is potentially eligible to recover a number of overhead costs for which we have not been asking for reimbursement. In your report, you refer to these as unacknowledged subsidies from host entities (page 9). Examples include administrative and technical support for shared assets such as copiers, computer networks, VOIP phone systems, and fleet vehicles provided by Planning Commission staff at Planning Commission expense; and office space, utilities, accounts payable & payroll services, and benefits administration provided by the Planning Commission's host entity, Hillsborough County. You refer to this as a double-nested hosting structure (page 11) and note that the FDOT's understanding of such structures may not be sufficiently complex. We agree. Further, we find that such hosting arrangements, while complex, benefit the public in sharing overhead expenses across a much larger labor pool, thereby leaving more federal grant dollars available for the work of metropolitan transportation planning.

We also agree that using the accepted de minimis rate for overhead costs, as we have for the last two years, continues to make a lot of sense in light of the complex hosting arrangement. Further, we acknowledge that more documentation will be needed if there is a desire in the future to increase overhead cost recovery beyond the de



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minimis rate. If that decision is made in the future, we will consult with the FDOT before proceeding.

We also note your Observation 3: "HCMPO has not adequately defined roles and responsibilities to perform grant-specific fiscal compliance duties." It is our observation that both the FDOT and Hillsborough County have changed many aspects of their accounting and grant management systems over the last few years. We will revisit and update our procedures documentation.

Again, we appreciate the time and technical expertise you have shared with us.

Sincerely,



Beth Alden  
Executive Director

Cc: Nancy Shephard, Special Projects Coordinator, FDOT  
Sandi Bredahl, FDOT District 7

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**APPENDIX C – Management Response**

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On July 29, 2020, the OIG received the following response from Mark Reichert, Metropolitan Planning Administrator with the Office of Policy Planning:

**Response to Finding:** We concur with the finding and recommendation.

**Corrective Action:** The audit report was reviewed, and the Finding and Observations were discussed with Beth Alden, MPO Executive Director, on July 29, 2020. She expressed the benefit gained through the audit by reviewing their cost allocation method with their accountant and Board Chair and understands the confusion caused by their prior indirect cost rate.

**Estimated Completion Date:** The recommendation was complied with on July 29, 2020. OPP will continue to monitor, along with the MPO Planning staff in District Seven, the use of the de minimis rate for indirect cost billing by the Hillsborough County MPO and work with the MPO should it elect to make any future changes to its cost allocation procedures. At this time, Ms. Alden stated they have no intention of moving away from using the de minimis rate. The District will use the annual Joint Certification Review process to monitor the cost allocation method.



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**DISTRIBUTION**

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**Affected Entity:**

Beth Alden, Executive Director, Hillsborough County MPO  
Rich Clarendon, Assistant Executive Director, Hillsborough County MPO  
Felicia Pulliam, Financial Manager, Hillsborough County City-County Planning Commission

**Responsible Manager:**

Mark Reichert, Metropolitan Planning Administrator, Office of Policy Planning

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Commissioner Pat Kemp, Vice Chair, Hillsborough County MPO Board  
Melissa Zornitta, Executive Director, Hillsborough County City-County Planning Commission

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**PROJECT TEAM**

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Engagement was conducted by:  
Cathe Ferguson, Auditor

Under the supervision of:  
Tim Crellin, Deputy Audit Director for Intermodal  
Nancy Shepherd, Special Projects Coordinator and External Audit Liaison  
Joseph W. Gilboy, Director of Audit

Approved by:  
Kristofer B. Sullivan, Inspector General

**STATEMENT OF ACCORDANCE**

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The Department's mission is to provide a safe transportation system that ensures the mobility of people and goods, enhances economic prosperity, and preserves the quality of our environment and communities.

The Office of Inspector General's mission is to promote integrity, accountability, and process improvement in the Department of Transportation by providing objective, fact-based assessments to the DOT team.

This work product was prepared pursuant to section 20.055, Florida Statutes, in accordance with the Association of Inspectors General *Principles and Standards for Offices of Inspector General*, and conforms with The Institute of Internal Auditors' *International Standards for the Professional Practice of Internal Auditing*.

Please address inquiries regarding this report to the Department's Office of Inspector General at (850) 410-5800.

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**ATTACHMENT 1**

