8. Metropolitan Planning Organization Compliance

Key Chapter Changes

The Metropolitan Planning Organization (MPO) Compliance chapter was updated to streamline content and focus on the roles and responsibilities of District MPO Liaisons in the metropolitan transportation planning process. (October 5, 2026)

CHAPTER 8
MPO Compliance

8.1 Introduction

This chapter provides guidance to the Florida Department of Transportation (FDOT) District MPO Liaisons on MPO administration, management oversight, progress reporting, and invoice submittals. MPOs have 90 days after the close of the reporting period to submit invoices to FDOT. Progress reports are submitted quarterly by the District MPO Liaisons in the **District MPO Liaison Toolkit**. The timeframe for reporting can be found in **Table 8.1**.

It should be noted that for MPO invoices, a progress report will also need to be submitted for each invoice period. This is discussed further in **8.2 Actions to Achieve/Maintain Compliance.** Current invoice and progress report templates, checklists, and related guidance are available on the **Planning and Assistance Training Hub (PATH) website**.

Table 8.1 Progress Report Timeline

Quarter	Timeframe Reported	Report Deadline
1	July-September	December 31
2	October-December	March 31
3	January-March	June 30
4	April-June	September 30

Table 8.2 Key Resources in this Chapter

Resource Name	Description
District MPO Liaison Toolkit	Provides District MPO Liaisons with guidance, checklists, templates, and other tools needed to coordinate consistently and effectively with MPOs
Planning and Assistance Training Hub (PATH)	A centralized resource providing guidance materials, templates, and tools related to metropolitan transportation planning documents and processes.

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Table 8.3 Citations for MPO Compliance

Citation	Title
2 CFR 200.208	Specific Conditions for Imposing Additional Grant Requirements
2 CFR Part 200	Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
23 CFR Part 420	Planning and Research Program Administration
23 USC 104(d)(2)(B)	Timing for MPO Reimbursement by State DOTs.
23 USC 134	Metropolitan Transportation Planning
18 USC 1001	Penalties for False and Fraudulent Grant Information
31 USC 3729-3730	False Claims and Civil Actions for False Claims
31 USC 3801-3812	Administrative Remedies for False Claims and Statements
49 USC 5303	Metropolitan Transportation Planning
FTA Circular C 8100.1C	Program Guidance for Metropolitan Planning Program and State Planning and Research Program (SPRP) Grants
s. 339.175, F.S.	MPO Authorities, Powers, Duties, and Responsibilities.

In addition to all the planning requirements, MPOs are also expected to comply with federal and state laws and regulations pertaining to the successful administrative operation of the MPO (i.e., the development and timely submittal of progress reports and invoices). District MPO Liaisons will work with their MPOs to establish a process that will result in full compliance with federal and state laws and regulations. To achieve this goal, each District and MPO will follow a series of steps and actions that are clearly understood and adhered to by each MPO and District. As stipulated in federal regulations, FDOT has the authority to impose additional monitoring requirements.

8.2 Actions to Achieve/Maintain Compliance

District MPO Liaisons will use the following actions to help MPOs maintain administrative compliance:

- The District MPO Liaison will maintain regular communication with each MPO about administrative operations through meetings, conference calls, or other mutually agreed upon methods.
- As the primary point of contact between FDOT and the MPO, the District MPO Liaison must review each invoice package, including the corresponding progress report, for completeness and compliance with submittal guidelines within five business days of receipt.
- If an invoice or progress report is deficient, the District MPO Liaison shall immediately notify the appropriate MPO staff member and request correction within the same five business day review period.
- If the resubmittal remains deficient or is not received on time, the District MPO Liaison shall notify the MPO Staff Director in writing of an Administrative Corrective Action. This action means the MPO must undergo a process to correct its deficient administrative practices.
- The District MPO Liaison will choose the appropriate corrective action, as shown in **Table 8.4 Administrative Corrective Actions and Responses,** to address and remedy any deficiencies.
- For more severe deficiencies, the District MPO Liaison will report findings and provide status updates on Administrative Corrective Actions to the MPO Staff Director and MPO Board. Additionally, the MPO may be required to prepare an MPO Administrative Compliance Plan (See section **8.2.1 When Deficiencies are not Addressed**).
- After confirming resolution of an Administrative Corrective Action, the District MPO Liaison shall notify the appropriate MPO staff member.

Table 8.4 Administrative Corrective Actions and Responses

Corrective Action	When It Applies	Required Response
Informal Resolution	Issue can be corrected through routine coordination.	The District MPO Liaison coordinates with the MPO to resolve the issue through routine communication, such as a call, email, meeting, or other informal consultation. Formal corrective action documentation is not required.
Formal Staff Notification	Issue is not corrected through routine coordination or requires documented corrective action.	The District MPO Liaison provides written notification to the MPO Staff Director identifying the issue and requesting corrective action. MPO Staff Director involvement is required.
Board Notification	Issue requires MPO Board awareness, action, or policy direction.	The District MPO Liaison provides written notifications to the MPO Staff Director and MPO Board Chair describing the deficiency. The District MPO Liaison briefs the MPO Board, and the MPO prepares an MPO Administrative Compliance Plan.
Administrative Compliance Plan	Issue remains unresolved, recurring noncompliance is identified, or additional monitoring requirements are needed to achieve compliance.	The District MPO Liaison initiates a consultative process with OPP, the District, and the MPO Board. The MPO prepares an MPO Administrative Compliance Plan documenting corrective actions, responsibilities, and timeframes.
Agency Escalation	Issue presents significant compliance concerns or remains unresolved after documented corrective actions.	FDOT Central Office and the District contact the Federal Highway Administration (FHWA) and may coordinate with the Executive Office of the Governor, elected officials, or other local representatives, as appropriate. The MPO prepares or updates an MPO Administrative Compliance Plan and documents actions necessary to achieve compliance.

8.2.1 When Deficiencies are not Addressed

The timeframe for resolving each Administrative Corrective Action will be jointly determined by the District and MPO based on the nature and complexity of the required correction, consistent with Section 2.4 of the Joint Certification Review Template. If the District MPO Liaison determines that the MPO has not taken sufficient action within the agreed-upon timeframe to resolve its Administrative Corrective Action(s), the following steps will be initiated:

- The District MPO Liaison will organize a meeting between the District and the MPO Staff Director to discuss the District's findings regarding the unresolved Administrative Corrective Action(s).
    - The District MPO Liaison will transmit the District's findings in writing to the MPO Staff Director and to the MPO Board Chair.
    - A copy of the District MPO Liaison's findings shall also be transmitted to District leadership, and the FDOT Office of Policy Planning (OPP).
    - Immediately following the meeting, the District MPO Liaison will ensure the MPO prepares a detailed meeting summary that includes key discussion points as well as the outcomes, actions, and timelines that were agreed upon by the District and MPO to resolve all deficiencies.
- If there are continuing or incomplete Administrative Corrective Action(s) after the meeting between the District and MPO, the followings actions must be taken.
    - The District MPO Liaison will notify the MPO Board, District leadership, and OPP leadership of any failure by an MPO to meet the outcomes, expectations, or timelines as detailed within the summary of the above meeting.
    - The MPO Administrative Compliance Plan must identify the corrective actions necessary to address the identified deficiencies, assign responsible parties, establish implementation timeframes, and describe how compliance will be achieved and monitored. The plan must be approved by District leadership and may incorporate one or more of the following strategies:
        - Technical assistance, training, and workshops provided by FDOT, FHWA, and consultant support teams.
        - Peer exchanges and coordination meetings with other MPOs and FDOT District representatives.
        - Staffing and organizational evaluations, including recommendations related to human resources, budgeting and financial management, and employee development.
    - The District MPO Liaison will ensure the MPO Staff Director presents the MPO Administrative Compliance Plan to the MPO Board at a regularly scheduled MPO Board meeting. The presentation must include the outcomes, expectations, and timelines that must be adhered to by the MPO to achieve and maintain compliance with the metropolitan transportation planning process.