

FY24 Program Accountability Results (PAR) Review

Florida Non-TMA MPOs

Fiscal Constraint of the Long-Range Transportation Plans

March 2024

PAR Overview

For Fiscal Year (FY) 2024, the Florida Division Planning staff conducted (3) Program Accountability Results (PAR) reviews on three of the State's non-Transportation Management Area (TMA) Metropolitan Planning Organizations (MPOs). The purpose of these reviews is to assess fiscal constraint of the Long-Range Transportation Plans (LRTPs) and determine their compliance with [23 CFR 450.324](#). This review was conducted as a risk response mitigation strategy to address the Division's 6th risk statement for FY21, namely that if MPOs do not include all regionally significant projects within an LRTP, then LRTPs will not be fiscally constrained, and projects may be advanced that do not come from the MPO planning process. This year's review effort concludes the assessment of all nine non-TMA MPOs in Florida conducted over a three-year period. The non-TMA MPOs selected for review this FY were: Bay; Hernando-Citrus; and Okaloosa-Walton MPO.

To initiate the PARs, the Division utilized the fiscal constraint-related questions from the internally developed "2019 LRTP Checklist with 2018 Expectations Letter" to create the PAR LRTP Fiscal Constraint Checklist questions. The Planners reviewed the subject MPO's current LRTPs to answer each of the questions.

All answers in the current review were documented and evaluated for trend analysis. This document summarizes the FY24 PAR reviews with respect to 18 specific planning questions on LRTP fiscal constraint. The responses provided below are kept with the PAR data in the Division files.

PAR Questions and Observations

In partnership with FDOT and the MPOs, the FHWA Florida Division and Federal Transit Administration developed a set of strategies to provide clarification of some of the requirements to be addressed in the next cycle of LRTP updates. The regulations describe the basic requirements that need to be met for the LRTPs and metropolitan transportation planning process. However, federal stewardship observations noted misunderstanding of the regulations and the strategies were presented to help clarify some of those requirements. These strategies are referred to as the “Expectations Letter”. FHWA and FTA sent a Planning Expectations Letter to FDOT and the MPOs in 2008, 2012, and most recently in 2018 to focus attention on specific regulatory planning requirements and increase compliance. In 2019, the FHWA Division Planning Team updated our LRTP review checklist, to include the 2018 Expectations Letter clarifications to the standard regulatory requirements. Division Planners use this LRTP Checklist during TMA certification reviews to assess MPO compliance with LRTP regulatory requirements. The 2024 PAR checklist questions are the fiscal constraint-related questions from the 2019 LRTP Checklist. The fiscal constraint questions address topics such as the timeframe of the LRTP, whether all projects and funding for the planning timeframe are identified, and whether a cost estimate and funding source for each project phase is identified.

A. Areas of Compliance Found in the 2024 PAR Review

There were fifteen (15) questions in which all three MPOs reviewed were found to comply. Requirements in which all MPOs were compliant include:

- PL1 - Does the LRTP have a planning horizon of at least 20 years as of the effective date? 23 CFR 450.324(a)
- PL2 – Did the MPO show all the projects and project funding for the entire time period covered by the LRTP, from the adoption date to the horizon year? 23 CFR 450.324(a)
- PL3 - Are projects described in sufficient detail to develop a cost estimate? 23 CFR 450.324(f)(9)
- PL4 – For projects included in the cost feasible plan, is an estimate of the cost and source of funding for each phase of the project being funded shown? (including the Project Development and Environment (PD&E) phase) 23 CFR 450.324(f)(9)
- PL6 – A financial plan that demonstrates how the adopted transportation plan can be implemented. 23 CFR 450.324(f)(11)
- PL7 - Does the financial analysis/fiscal constraint documentation demonstrate a clear separation of costs for operations and maintenance activities from other grouped and/or regionally significant projects? 23 CFR 450.324(f)(11)(i)
- PL8 - Were the estimates of available revenues developed cooperatively by the MPO, the State and Public Transportation Operators? Do the estimates include all reasonably

- expected resources from both public and private sources? 23 CFR 450.324(f)(11)(ii)
- PL9 - The financial plan shall include recommendations on any additional financing strategies to fund projects and programs included in the metropolitan transportation plan. In the case of new funding sources, strategies for ensuring their availability shall be identified. The financial plan may include an assessment of the appropriateness of innovative finance techniques (for example, tolling, pricing, bonding, public private partnerships, or other strategies) as revenue sources for projects in the plan. 23 CFR 450.324(f)(11)(iii)
 - PL10 - Are projects within the first ten years of the Plan notated or flagged to identify which projects are planned to be implemented with federal funds? 23 CFR 450.324(f)(11)(iii)
 - PL11 - For projects beyond the first ten years of the Plan, are the projects clearly labeled as a combined Federal/State funding source? 23 CFR 450.324(f)(11)(iii)
 - PL12 - Does the financial plan take into account all projects and strategies proposed for funding with other federal funds, state, local and private sources? 23 CFR 450.324(f)(11)(iv)
 - PL13 - Are the revenues and expenses in Year-Of-Expenditure dollars, reflecting inflationary rates? Were these rates developed cooperatively among the MPO, the State and the Public Transportation Operators? 23 CFR 450.324(f)(11)(iv)
 - PL15 - For illustrative purposes, the financial plan may include additional projects that would be included in the adopted transportation plan if additional resources beyond those identified in the financial plan were to become available. 23 CFR 450.324(f)(11)(vii)
 - PL16 - Does the plan include pedestrian walkway and bicycle transportation facilities in accordance with 23 USC 217(g)? 23 CFR 450.324(f)(12)
 - PL17 - If Boxed funds are utilized, are the individual projects utilizing the box listed? (or at a minimum, described in bulk in the LRTP i.e. PD&E for projects in Years 2016-2020). 23 CFR 450.326(h)

The review team determined two of the questions (PL14 and PL18) to not be applicable to the MPOs since none used cost ranges or scenario planning in their LRTPs. This narrowed the questions from 18 to 16.

B. Areas of Frequent Non-Compliance Found in the 2024 PAR Review

There were no requirements missed by two or more of the three MPOs.

C. Areas of Occasional Non-Compliance Found in the 2024 PAR Review

There was one requirement missed by one of the three MPOs as follows:

- PL5 - Do the project phases include Preliminary Engineering, ROW and Construction in the CFP if fully funded or in the Needs/Illustrative list (or other informational part of the LRTP) if not fully funded. 23 CFR 450.324(f)(9)

The missed requirement identified above relates to the following:

- All phases of local projects are not reflected in the Cost Feasible LRTP or in an illustrative list. According to the review for the Bay County MPO, "Table 34 (p. 150/415) includes FY20-25 local projects with funding just in PD&E. Otherwise, SIS and non-SIS projects all appear to be fully funded or shown as illustrative. "

D. Florida Division Recommendations Based on Compliance Observations

Based on the findings of this 2024 PAR Review, FHWA recommends that FDOT follow up with Bay County MPO on incorporating all phases of local projects in the LRTP to ensure compliance with 23 CFR 450.324(f)(9). **FHWA requests FDOT provide a status report of this recommendation before August 1, 2024.**

PAR Checklists

The focus of the targeted review this performance year was on the non-TMA MPO fiscal constraint of LRTPs. We used 18 Division specific planning questions to conduct the reviews. Use of the comment section by the Planning Team during the review process was emphasized and encouraged to help explain the specific reasons for compliance and noncompliance. The quality control/quality assurance step relied heavily on the comment section to understand the reason for the determination, and in some situations, adjusted responses for consistency. Any changes were also justified in the comment section to provide consistency in the review, and to explain reasons for compliance and noncompliance determinations. This effort ensures that the Team Leader reviews the checklists for recording errors, working with the appropriate Planner to revise and/or clarify the recorded entries as needed, prior to the responses being collated for this report.

The checklist was an effective tool for capturing key information and documenting results of the review.

Conclusion

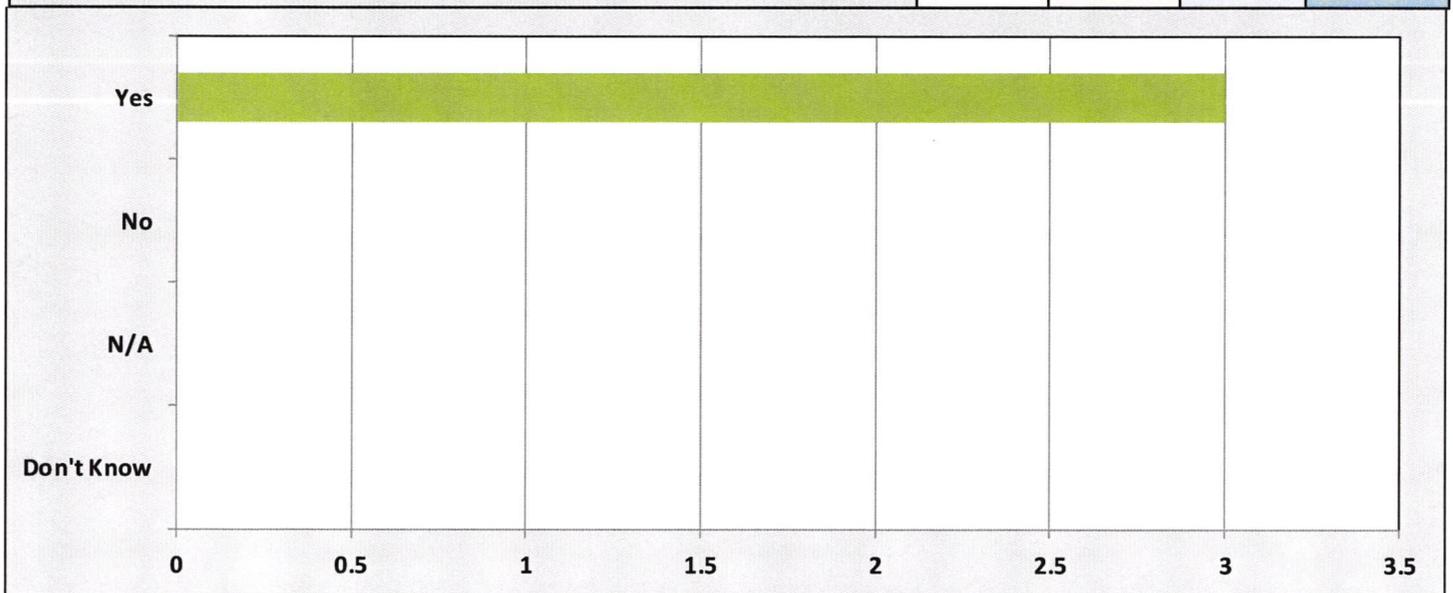
FY24 was the third year of a three-year effort to focus on the fiscal constraint of LRTPs for the nine non-TMA MPOs. The review was based on LRTP fiscal constraint being a top risk area during the Florida Division's Program and Risk Assessment processes. The PAR reviews largely indicate that the three MPOs reviewed substantially meet the fiscal constraint requirements in

[23 CFR Part 450.324](#) For the requirement in which we found noncompliance, one recommendation has been provided. The FHWA Planning Team will work with the FTA, FDOT Central office, District Liaisons and MPOs to implement this recommendation during LRTP updates and amendments. The Planning Team will also take advantage of other outreach opportunities to discuss these requirements and provide examples to MPOs of how these requirements can be implemented. FHWA will provide this report to FTA, FDOT and the MPOs to make them aware of common areas of concern and to encourage use of the recommendations provided herein.

PAR reviews are an effective tool to complete a quick and focused review of various program elements. Results from each of the reviews will be incorporated in the Division's subsequent Program and Risk Assessment processes and the annual Statewide Planning Finding and those processes will be used to determine if PARs will continue in the future and the potential review topic.

PLANNING PAR QUESTIONS/RESPONSE

PL1. Does the LRTP have a planning horizon of at least 20 years as of the effective date? 23 CFR 450.324(a)	Yes	No	N/A	Don't Know
	3	0	0	0
	100%	0%	0%	0%



Examples of Remarks for ‘Yes’ Response to Question PL1:

The TPO clearly documents the Plan's planning horizon of at least 20 years in multiple sections of Plan. This requirement is addressed in the Introduction (Page 1-3), and again in the Plan's Goals & Objectives (Page 2-10). Additionally, Roadway and Highway projects are grouped in five "Tiers" showing funding prioritization. Tier 1 being the "Existing and Committed" (before 2025), Tier 2, "Cost Feasible Interim Projects" (2025 - 2035), Tier 3 "Cost Feasible Projects" (2036-2045), Tier 4 "Illustrative Projects" and Tier 5 "Other Unfunded Needs" (Page 4-12). Finally, the Hernando/Citrus MPO Board Resolution #2019-8 adopted on December 4, 2019, listed that the LRTP must address no less than a 20-year planning horizon.

Examples of Remarks for ‘No’ Response to Question PL1:

There is not a “No” response.

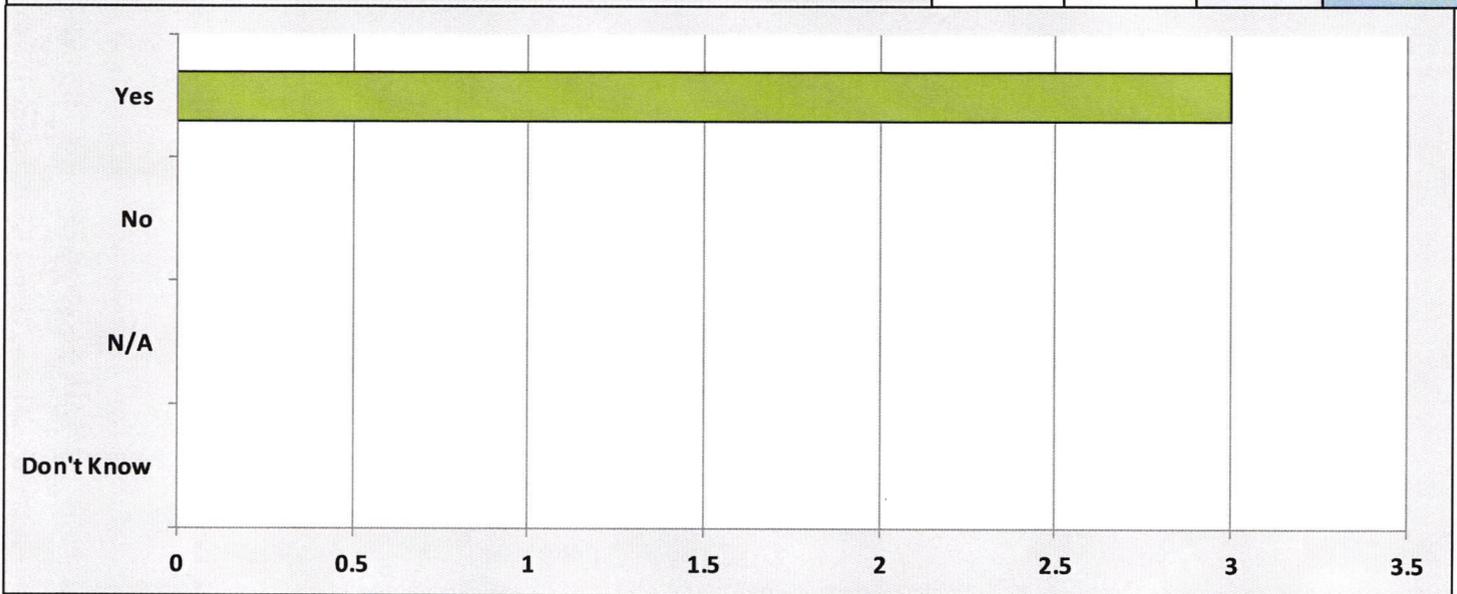
Examples of Remarks for ‘N/A’ Response to Question PL1:

There is not an “N/A” response for this question.

Examples of Remarks for ‘Don’t Know’ Response to Question PL1:

There is not a “Don’t Know” response for this question.

PL2. Did the MPO show all the projects and project funding for the entire time period covered by the LRTP, from the adoption date to the horizon year? 23 CFR 450.324(a)	Yes	No	N/A	Don't Know
	3	0	0	0
	100%	0%	0%	0%



Examples of Remarks for 'Yes' Response to Question PL2:

All projects presented cover the full range of years.

Examples of Remarks for 'No' Response to Question PL2:

There is not a "No" response for this question.

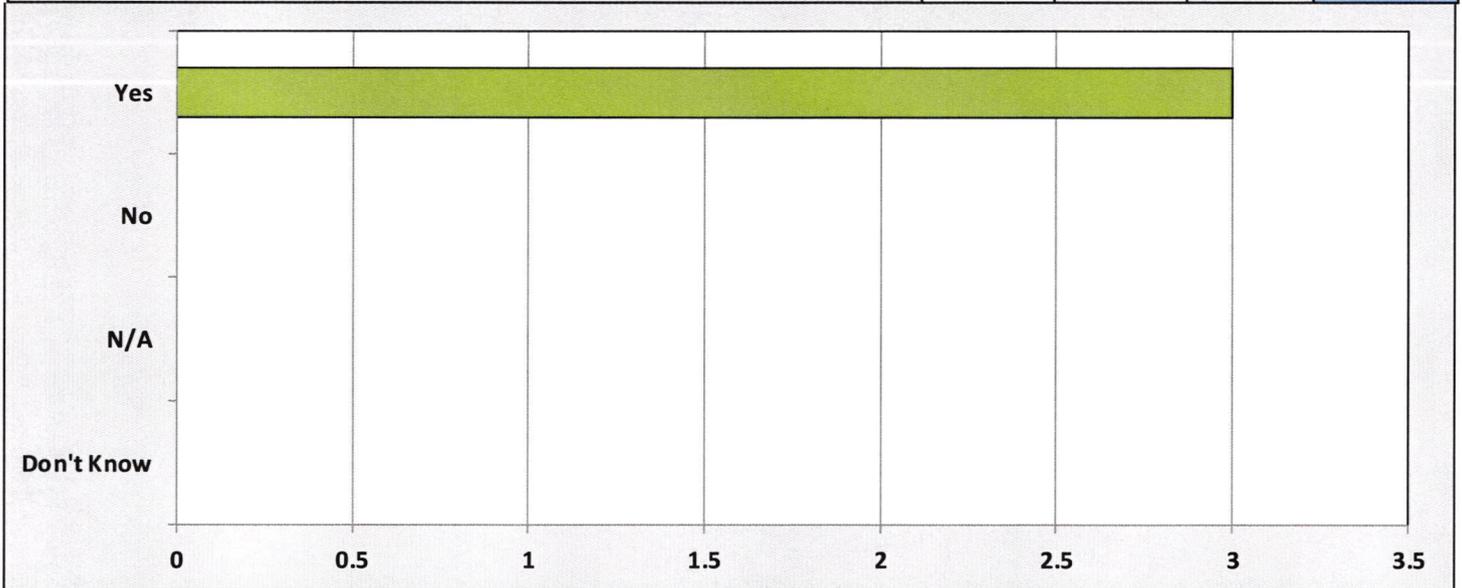
Examples of Remarks for 'N/A' Response to Question PL2:

There is not a "N/A" response for this question.

Examples of Remarks for 'Don't Know' Response to Question PL2:

There is not a "Don't Know" response for this question.

PL3. Are projects described in sufficient detail to develop a cost estimate? 23 CFR 450.324(f)(9)	Yes	No	N/A	Don't Know
	3	0	0	0
	100%	0%	0%	0%



Examples of Remarks for 'Yes' Response to Question PL3:

Chapter 4 of the Plan addressed in detail Financial Resources, which outlines relevant projects information to develop cost estimate for each project as needed. Additional details and project information are also included in Appendix A, C, D & E.

Examples of Remarks for 'No' Response to Question PL3:

There is not a "No" response for this question.

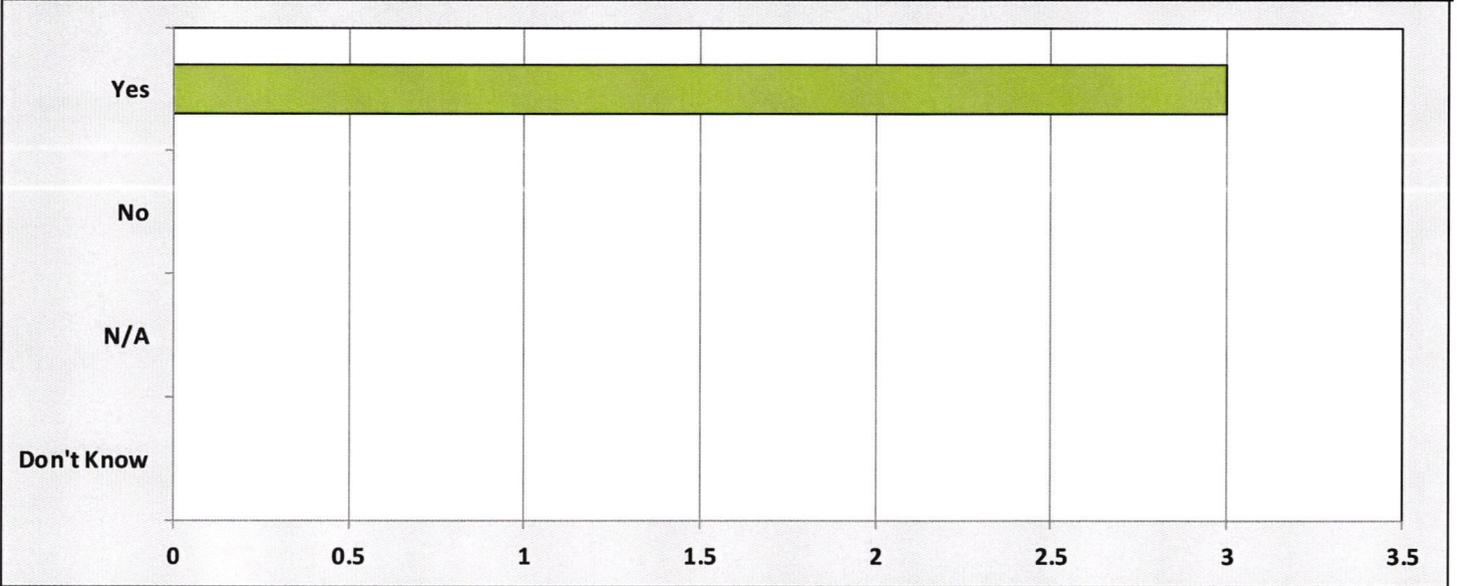
Examples of Remarks for 'N/A' Response to Question PL3:

There is not a "N/A" response for this question.

Examples of Remarks for 'Don't Know' Response to Question PL3:

There is not a "Don't Know" response for this question.

PL4. For projects included in the cost feasible plan, is an estimate of the cost and source of funding for each phase of the project being funded shown? (including the Project Development and Environment (PD&E) phase) 23 CFR 450.324(f)(9)	Yes	No	N/A	Don't Know
	3	0	0	0
	100%	0%	0%	0%



Examples of Remarks for ‘Yes’ Response to Question PL4:

The Financial Resources section of Chapter 4 of the Plan adequately displays the cost of projects and funding sources for each phase of the projects. (Bike/Ped Discretionary Grant Funded project information are also shown in detail in the appropriate section of the Plan. Additionally extensive are also accessible in Appendix A, C, D & E.

Examples of Remarks for ‘No’ Response to Question PL4:

There is not a “No” response for this question.

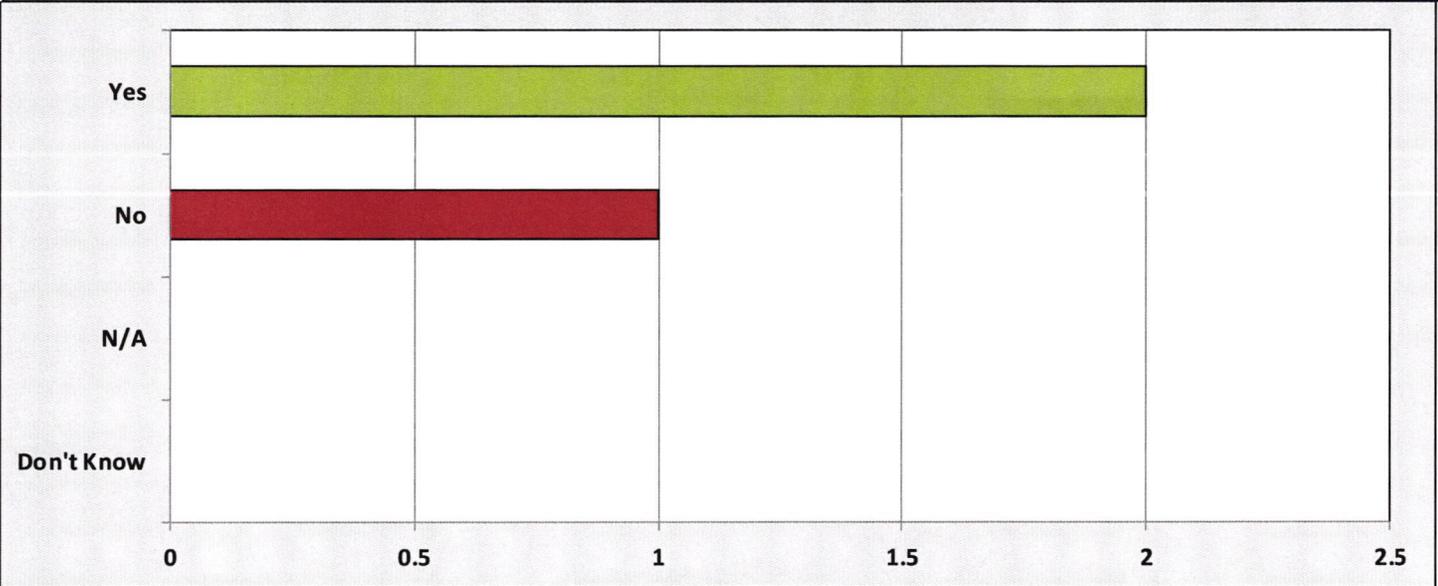
Examples of Remarks for ‘N/A’ Response to Question PL4:

There is not a “N/A” response for this question.

Examples of Remarks for ‘Don’t Know’ Response to Question PL4:

There is not a “Don’t Know” response for this question.

PL5. Do the project phases include Preliminary Engineering, ROW and Construction in the CFP if fully funded or in the Needs/Illustrative list (or other informational part of the LRTP) if not fully funded. 23 CFR 450.324(f)(9)	Yes	No	N/A	Don't Know
	2	1	0	0
	67%	33%	0%	0%



Examples of Remarks for 'Yes' Response to Question PL5:

Requirement addressed in Financial Resources section of Chapter 4 - Transportation Plan, Table 20 "Bike/Pedestrian/Trail Projects" (Page 4-10), Table 32 (P4-52 Also included in Appendix A, C, D, & E of the Plan.

Examples of Remarks for 'No' Response to Question PL5:

Table 34 (p. 150/415) includes FY20-25 local projects with funding just in PD&E. Otherwise, SIS and non-SIS projects all appear to be fully funded or shown as illustrative.

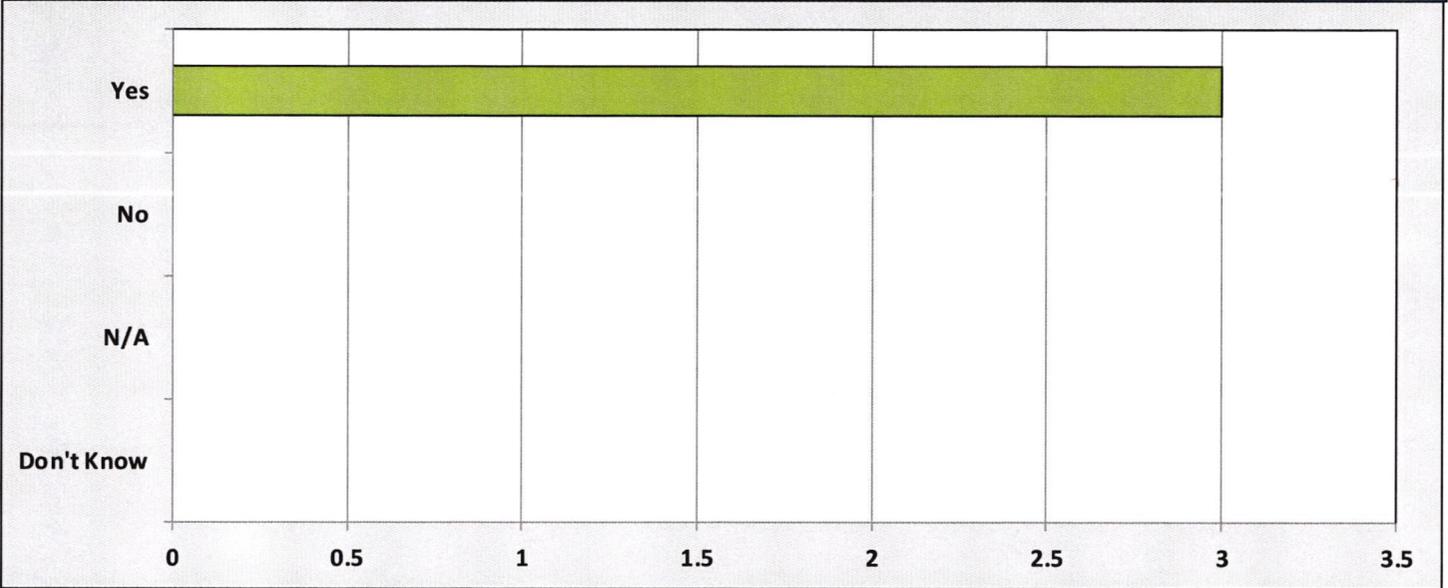
Examples of Remarks for 'N/A' Response to Question PL5:

There is not a "N/A" response for this question.

Examples of Remarks for 'Don't Know' Response to Question PL5:

There is not a "Don't Know" response for this question.

PL6. A financial plan that demonstrates how the adopted transportation plan can be implemented. 23 CFR 450.324(f)(11)	Yes	No	N/A	Don't Know
	3	0	0	0
	100%	0%	0%	0%



Examples of Remarks for 'Yes' Response to Question PL6:

Appdx F shows reasonably available State and Federal funds. Appdx F: Table 5 (Capacity Proj) and Table 9 (TA) correlates Revenue Forecasts between State/Federal and MPO funds available and project cost.

Examples of Remarks for 'No' Response to Question PL6:

There is not a "No" response for this question.

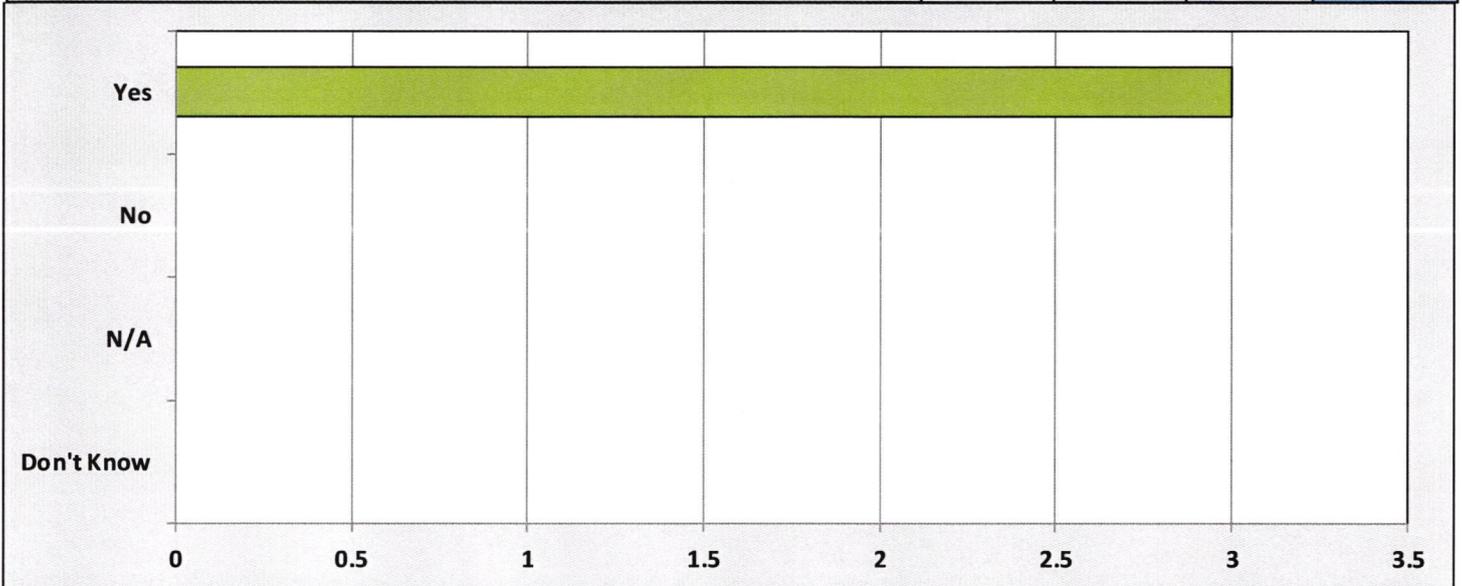
Examples of Remarks for 'N/A' Response to Question PL6:

There is not an "N/A" response for this question.

Examples of Remarks for 'Don't Know' Response to Question PL6:

There is not a "Don't Know" response for this question.

PL7. Does the financial analysis/fiscal constraint documentation demonstrate a clear separation of costs for operations and maintenance activities from other grouped and/or regionally significant projects? 23 CFR 450.324(f)(11)(i)	Yes	No	N/A	Don't Know
	3	0	0	0
	100%	0%	0%	0%



Examples of Remarks for ‘Yes’ Response to Question PL7:

OM is shown down to the District level. (p316/392, Appdx F - Table 10, 11, and 12)

Examples of Remarks for ‘No’ Response to Question PL7:

There is not a “No” response for this question.

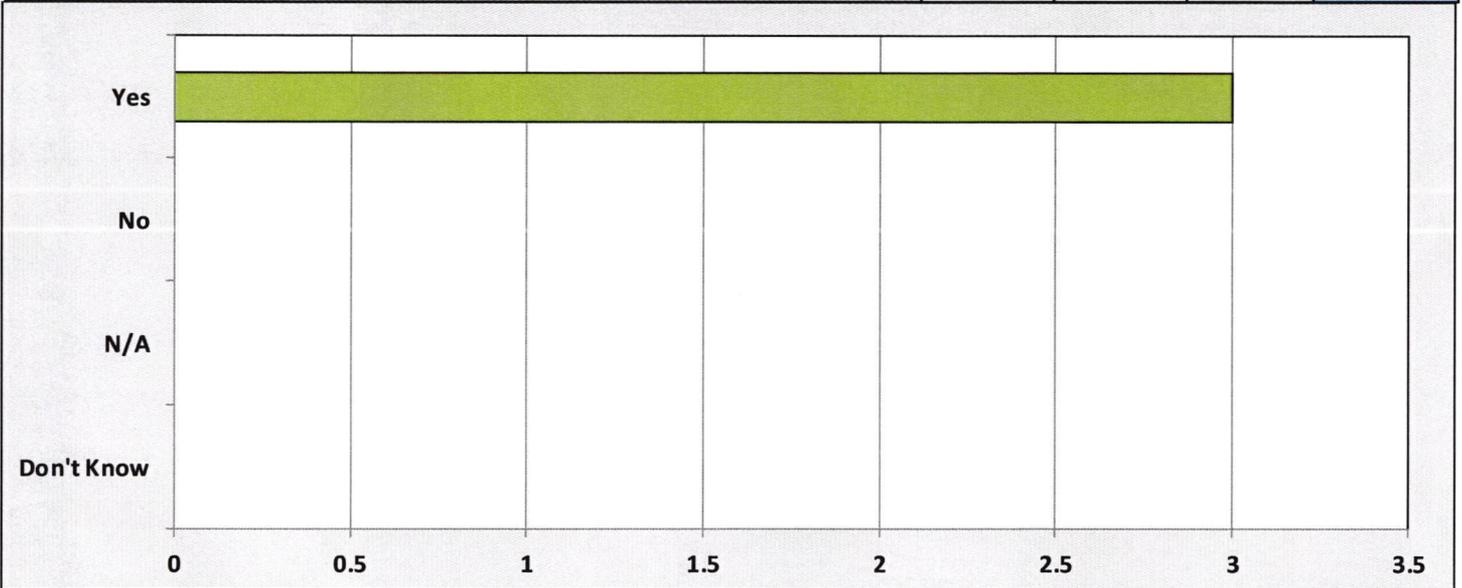
Examples of Remarks for ‘N/A’ Response to Question PL7:

There is not a “N/A” response for this question.

Examples of Remarks for ‘Don’t Know’ Response to Question PL7:

There is not a “Don’t Know” response for this question.

PL8. Were the estimates of available revenues developed cooperatively by the MPO, the State and Public Transportation Operators? Do the estimates include all reasonably expected resources from both public and private sources? 23 CFR 450.324(f)(11)(ii)	Yes	No	N/A	Don't Know
	3	0	0	0
	100%	0%	0%	0%



Examples of Remarks for 'Yes' Response to Question PL8:

Estimates include all sources mentioned.

Examples of Remarks for 'No' Response to Question PL8:

There is not a "No" response for this question.

Examples of Remarks for 'N/A' Response to Question PL8:

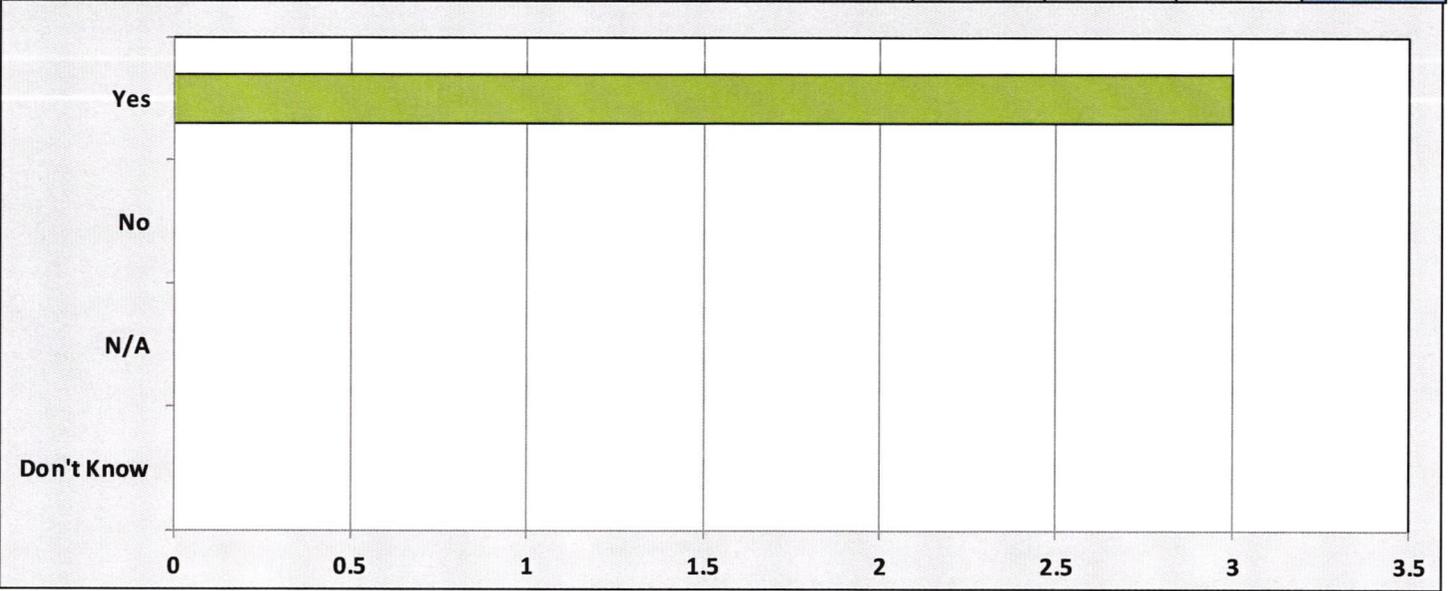
There is not an "N/A" response for this question.

Examples of Remarks for 'Don't Know' Response to Question PL8:

There is not a "Don't Know" response for this question.

PL9. The financial plan shall include recommendations on any additional financing strategies to fund projects and programs included in the metropolitan transportation plan. In the case of new funding sources, strategies for ensuring their availability shall be identified. The financial plan may include an assessment of the appropriateness of innovative finance techniques (for example, tolling, pricing, bonding, public private partnerships, or other strategies) as revenue sources for projects in the plan. 23 CFR 450.324(f)(11)(iii)

Yes	No	N/A	Don't Know
3	0	0	0
100%	0%	0%	0%



Examples of Remarks for ‘Yes’ Response to Question PL9:

The LRTP points to the Bay County 2045 Financial Resources Report. The FRR discusses Financing Options for Transportation (Section 5), tolls and bonds.

Examples of Remarks for ‘No’ Response to Question PL9:

There is not a “No” response for this question.

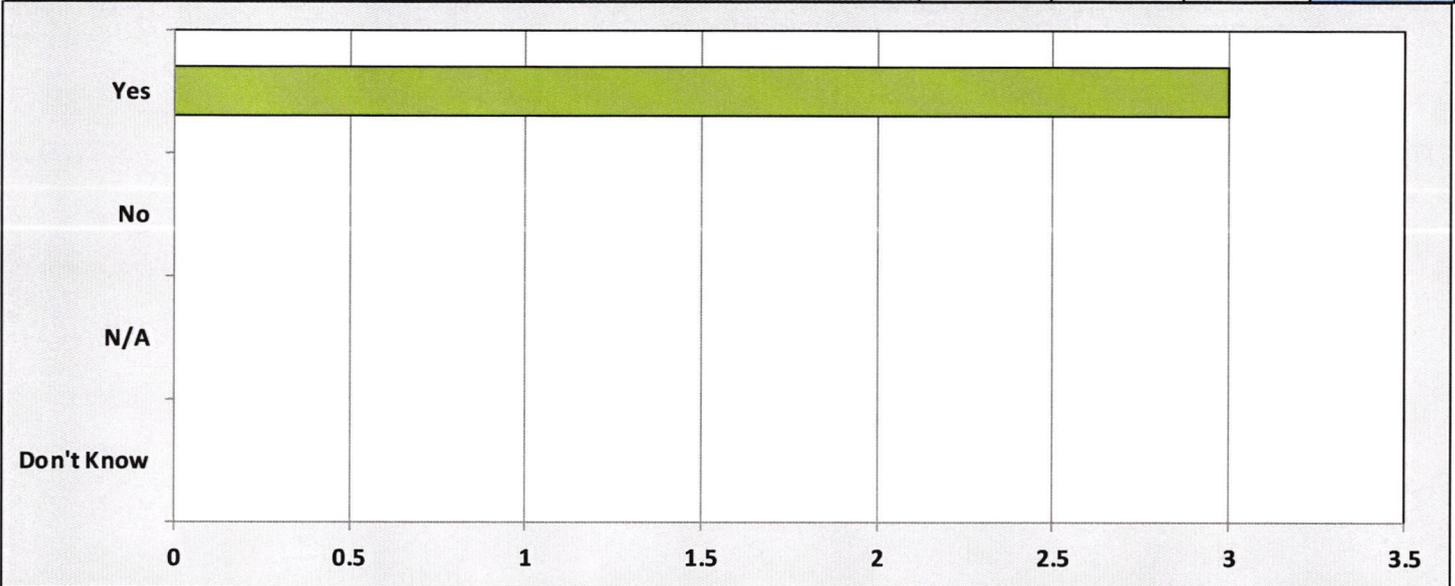
Examples of Remarks for ‘N/A’ Response to Question PL9:

There is not a “N/A” response for this question.

Examples of Remarks for ‘Don’t Know’ Response to Question PL9:

There is not a “Don’t Know” response for this question.

PL10. Are projects within the first ten years of the Plan notated or flagged to identify which projects are planned to be implemented with federal funds? 23 CFR 450.324(f)(11)(iii)	Yes	No	N/A	Don't Know
	3	0	0	0
	100%	0%	0%	0%



Examples of Remarks for ‘Yes’ Response to Question PL10:

Yes, this information is adequately displayed in Chapters 4 and 7 of the Plan in multiple sections. Chapter 4, Pages 4-12 thru 4-59 shows the Tier 1 with the projects for the 1st five years and Tier shows projects which will be implemented in the second five year with federal funds. The federal funded capital and operation projects are also shown on pages 4-43 thru 4-44. Chapter 7 clearly defines the implementation action plan and projects implemented with Federal funding.

Examples of Remarks for ‘No’ Response to Question PL10:

There is not a “No” response for this question.

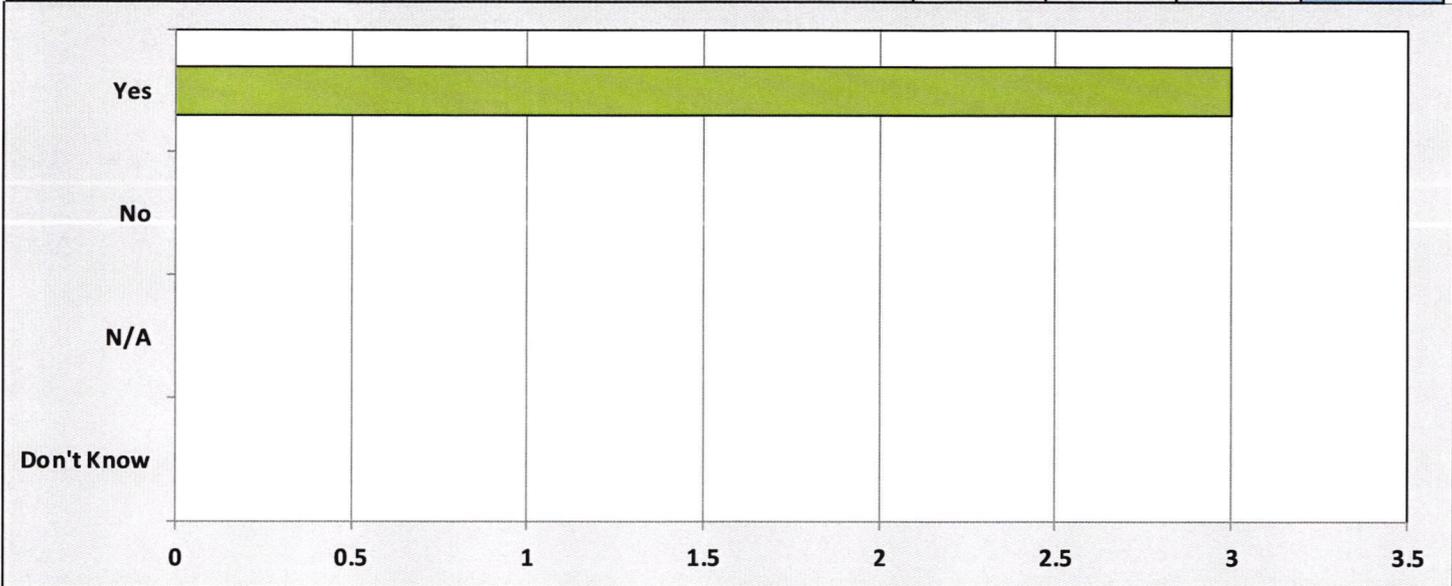
Examples of Remarks for ‘N/A’ Response to Question PL10:

There is not an “N/A” response for this question.

Examples of Remarks for ‘Don’t Know’ Response to Question PL10:

There is not a “Don’t Know” response for this question.

PL11. For projects beyond the first ten years of the Plan, are the projects clearly labeled as a combined Federal/State funding source? 23 CFR 450.324(f)(11)(iii)	Yes	No	N/A	Don't Know
	3	0	0	0
	100%	0%	0%	0%



Examples of Remarks for 'Yes' Response to Question PL11:

TR7-28, Table 11 lists projects funded with State and Federal funds.

Examples of Remarks for 'No' Response to Question PL11:

There is not a "No" response for this question.

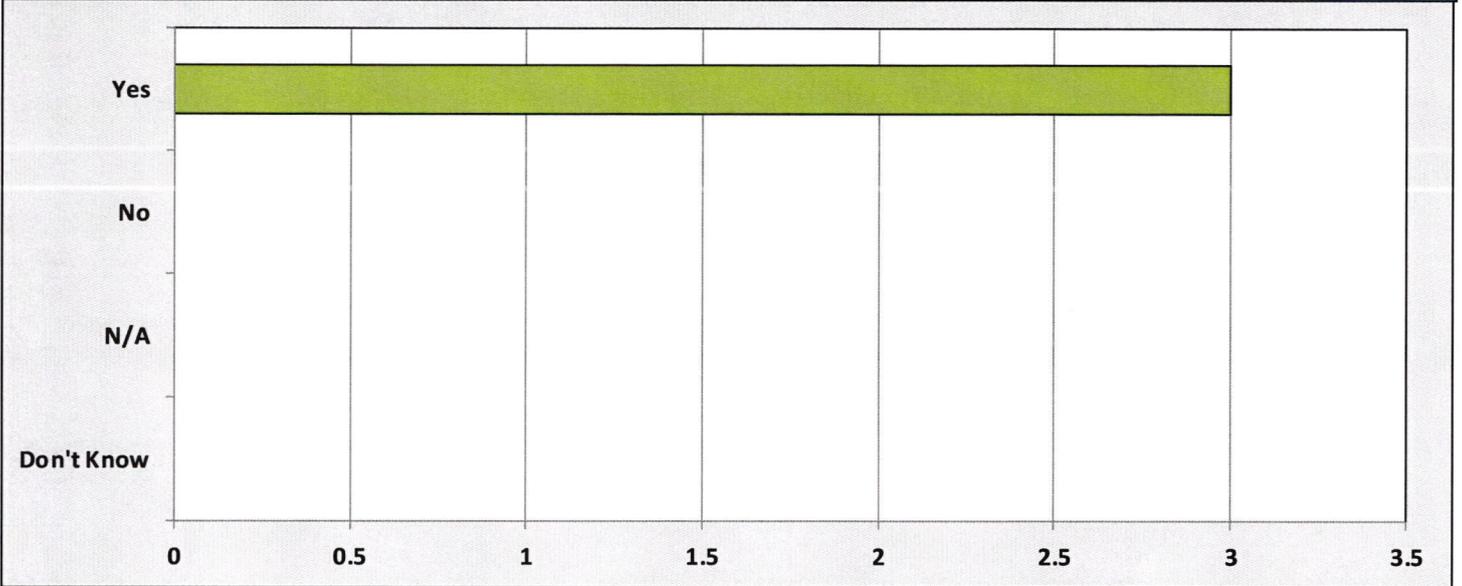
Examples of Remarks for 'N/A' Response to Question PL11:

There is not an "N/A" response for this question.

Examples of Remarks for 'Don't Know' Response to Question PL11:

There is not a "Don't Know" response for this question.

PL12. Does the financial plan take into account all projects and strategies proposed for funding with other federal funds, state, local and private sources? 23 CFR 450.324(f)(11)(iv)	Yes	No	N/A	Don't Know
	3	0	0	0
	100%	0%	0%	0%



Examples of Remarks for ‘Yes’ Response to Question PL12:

Yes, the Financial Plan accounts for projects and strategies proposed for funding with other federal funds, state funds, and local and private sources. These projects are included in (Tier 4) Projects and M-Cores (Regional Projects) section of Chapter 4 of the Plan.

Examples of Remarks for ‘No’ Response to Question PL12:

There is not a “No” response for this question.

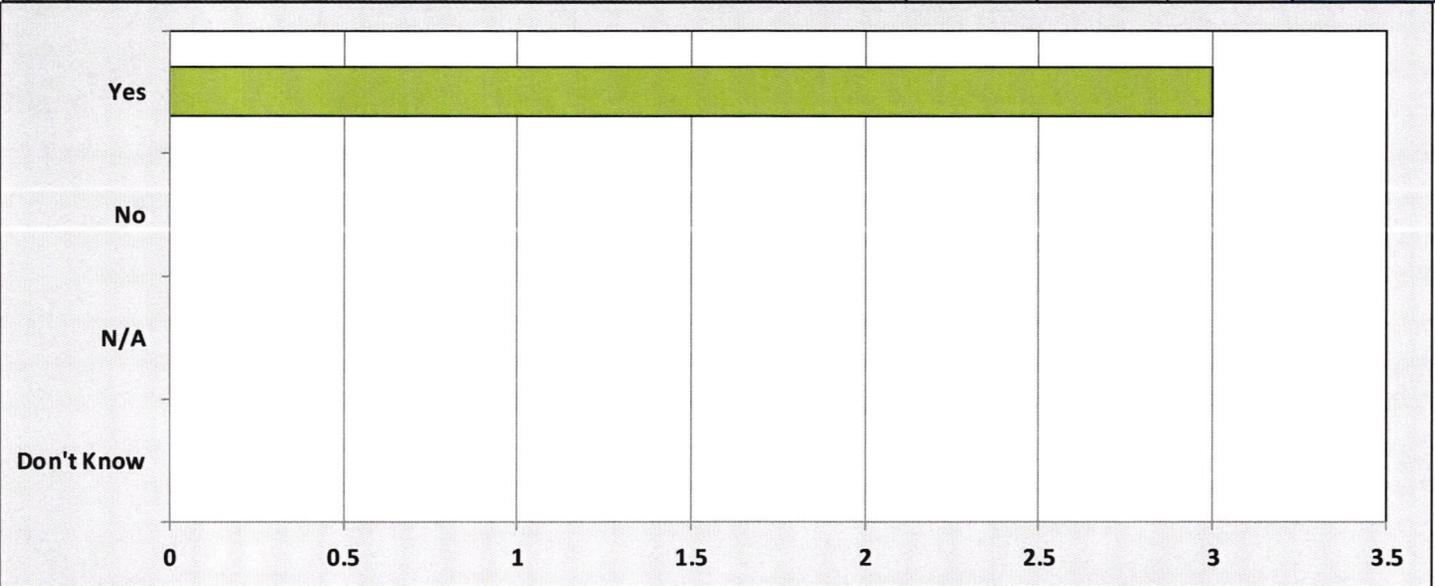
Examples of Remarks for ‘N/A’ Response to Question PL12:

There is not an “N/A” response for this question.

Examples of Remarks for ‘Don’t Know’ Response to Question PL12:

There is not a “Don’t Know” response for this question.

PL13. Are the revenues and expenses in Year-Of-Expenditure dollars, reflecting inflationary rates? Were these rates developed cooperatively among the MPO, the State and the Public Transportation Operators? 23 CFR 450.324(f)(11)(iv)	Yes	No	N/A	Don't Know
	3	0	0	0
	100%	0%	0%	0%



Examples of Remarks for 'Yes' Response to Question PL13:

Yes, Revenues and expenditures listed in the Plan are expressed in Year-of-Expenditures dollars. Appendix D - LRTP Roadway Projects and Cost and Year of Expenditure.

Examples of Remarks for 'No' Response to Question PL13:

There is not a "No" response for this question.

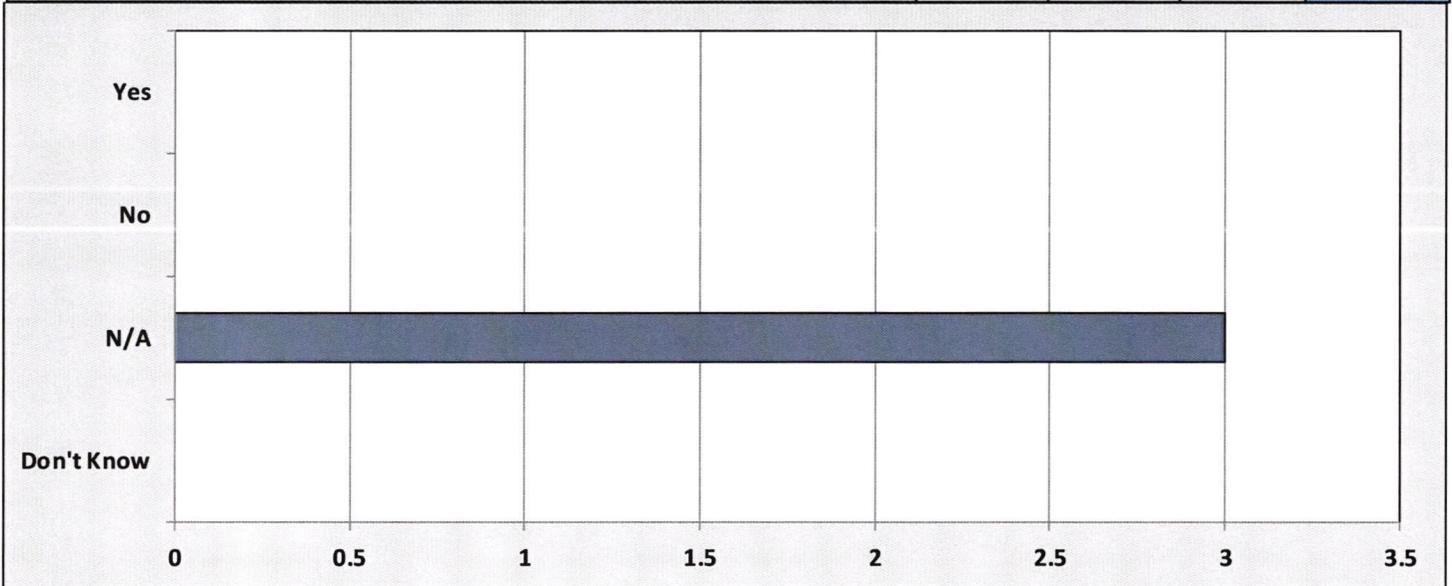
Examples of Remarks for 'N/A' Response to Question PL13:

There is not an "N/A" response for this question.

Examples of Remarks for 'Don't Know' Response to Question PL13:

There is not a "Don't Know" response for this question.

PL14. If the MPO uses cost ranges/bands beyond the first 10 years of the plan, are future funding sources reasonably expected to be available to support the projected cost ranges/band? 23 CFR 450.324(f)(11)(v)	Yes	No	N/A	Don't Know
	0	0	3	0
	0%	0%	100%	0%



Examples of Remarks for 'Yes' Response to Question PL14:

There is not a "Yes" response for this question.

Examples of Remarks for 'No' Response to Question PL14:

There is not a "No" response for this question.

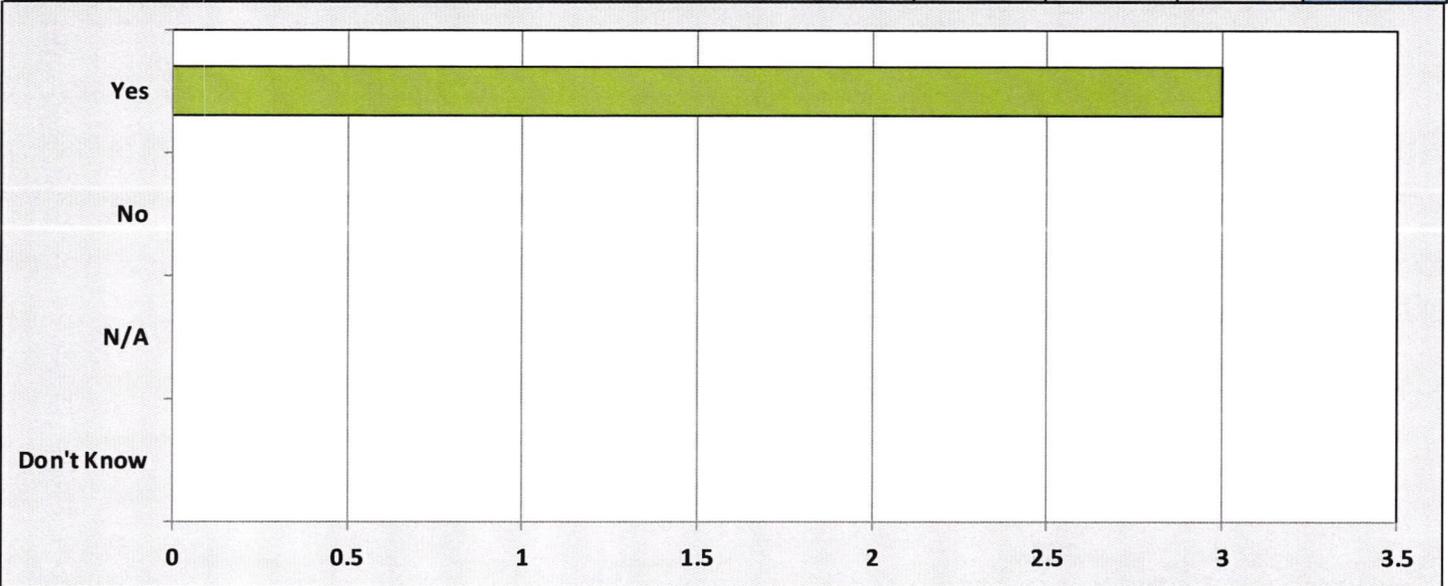
Examples of Remarks for 'N/A' Response to Question PL14:

- *Cost ranges/bands are not used.*

Examples of Remarks for 'Don't Know' Response to Question PL14:

There is not a "Don't Know" response for this question.

PL15. For illustrative purposes, the financial plan may include additional projects that would be included in the adopted transportation plan if additional resources beyond those identified in the financial plan were to become available. 23 CFR 450.324(f)(11)(vii)	Yes	No	N/A	Don't Know
	3	0	0	0
	100%	0%	0%	0%



Examples of Remarks for 'Yes' Response to Question PL15:

The Transportation Plan in Chapter 4 shows this in the Cost Feasible Plan and also in Appendix A, Revenue Forecast, the Illustrative (Tier 4) Projects and M-Cores (Regional Projects) section of Chapter 4 of the Plan.

Examples of Remarks for 'No' Response to Question PL15:

There is not a "No" response for this question.

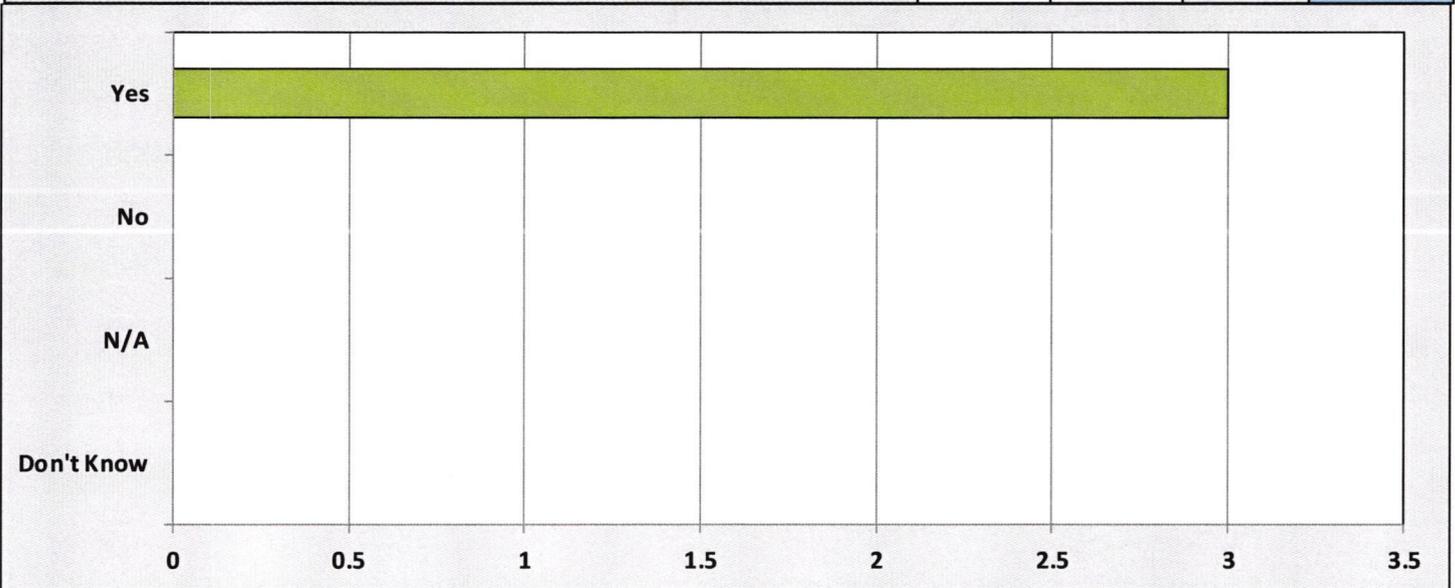
Examples of Remarks for 'N/A' Response to Question PL15:

There is not an "N/A" response for this question.

Examples of Remarks for 'Don't Know' Response to Question PL15:

There is not a "Don't know" response for this question.

PL16. Does the plan include pedestrian walkway and bicycle transportation facilities in accordance with 23 USC 217(g)? 23 CFR 450.324(f)(12)	Yes	No	N/A	Don't Know
	3	0	0	0
	100%	0%	0%	0%



Examples of Remarks for 'Yes' Response to Question PL16:

Requirement addressed in the Bicycle and Pedestrian Plan section of Chapter 4 of the Plan.

Examples of Remarks for 'No' Response to Question PL16:

There is not a "No" response for this question.

Examples of Remarks for 'N/A' Response to Question PL16:

There is not an "N/A" response for this question.

Examples of Remarks for 'Don't Know' Response to Question PL16:

There is not a "Don't Know" for this question.

PL17. If Boxed funds are utilized, are the individual projects utilizing the box listed? (or at a minimum, described in bulk in the LRTP i.e. PD&E for projects in Years 2016-2020). 23 CFR 450.326(h)	Yes	No	N/A	Don't Know
	0	0	3	0
	67%	0%	33%	0%



Examples of Remarks for 'Yes' Response to Question PL17:

They are considered in bulk.

Examples of Remarks for 'No' Response to Question PL17:

There is not a "No" response for this question.

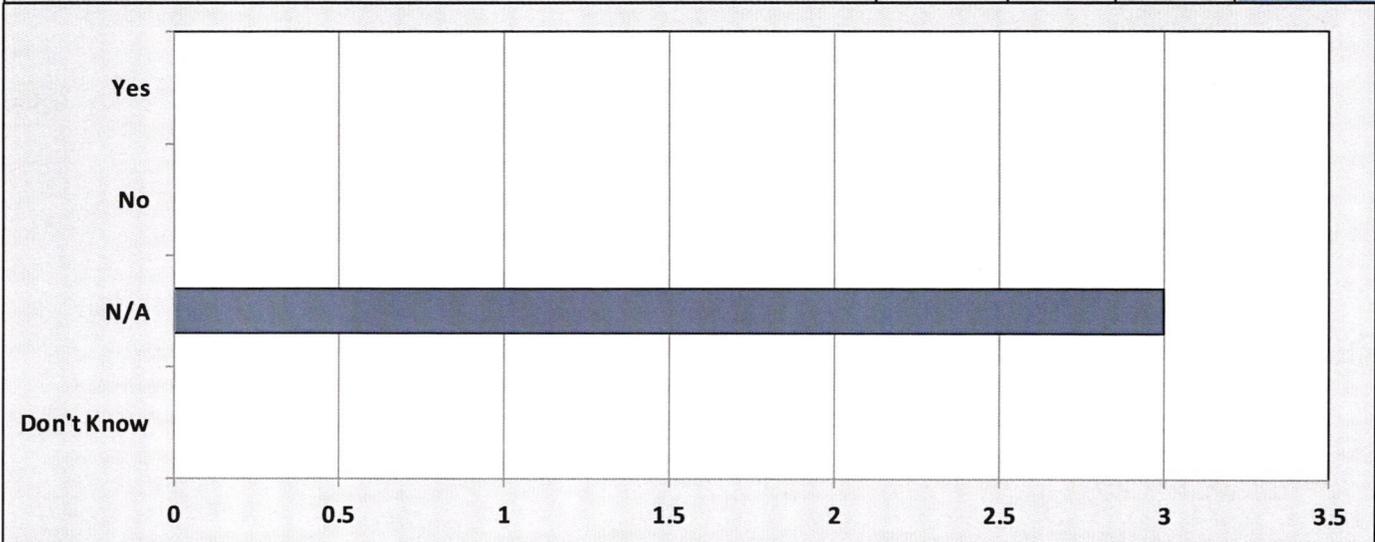
Examples of Remarks for 'N/A' Response to Question PL17:

Did not see boxed fund categories.

Examples of Remarks for 'Don't Know' Response to Question PL17:

There is not a "Don't Know" for this question.

<p>PL18. 18. An MPO may, while fitting the needs and complexity, voluntarily elect to develop multiple scenarios for consideration as part of the development of the metropolitan plan. 23 CFR 450.324(I) An MPO that chooses to develop multiple scenarios under this paragraph is encouraged to consider: 23 CFR 450.324(I)(1)</p> <ul style="list-style-type: none"> a) Potential regional investment strategies for the planning horizon; b) Assumed distribution of population and employment; c) A scenario that, to the maximum extent practicable, maintains baseline conditions for the performance areas identified in §450.306(d) and measures established under 23 CFR part 490; d) Revenue constrained scenarios based on the total revenues expected to be available over the forecast period of the plan; and e) Estimated costs and potential revenues available to support each scenario. 	Yes	No	N/A	Don't Know
	0	0	3	0
	0%	0%	100%	0%



Examples of Remarks for 'Yes' Response to Question PL14:

There is not a "Yes" response for this question.

Examples of Remarks for 'No' Response to Question PL14:

There is not a "No" response for this question.

Examples of Remarks for 'N/A' Response to Question PL14:

Not Applicable to Hernando/Citrus TPO

Examples of Remarks for 'Don't Know' Response to Question PL14:

There is not a "Don't Know" response for this question.