



## CORRECTIVE ACTION PLAN (CAP) MATRIX

### WisDOT Compliance Site Review

Subrecipient: City of WatertownDate: April 14, 2023 April 14, 2023;  
amended 7/6/23

**DIRECTIONS:** Please review the recommended actions column below. Fill in the blank "Action Steps" boxes by describing what action the subrecipient has taken to address the Findings (Findings – Action Step must be completed. Advisory are for your information.). For particular sections, WisDOT and/or RLS will provide supplementary technical assistance and templates when needed. Return CAP (in Word format) to cglover@rlsandassoc.com within 2 weeks for review.

SECTION 1: PROGRAM MANAGEMENT/OVERSIGHT – ACTION REQUIRED				
Compliance Area/Topic	Recommended Action	Action Steps	Timeline	Status
Legal Authority <a href="#">FTA Circular 5010.1D</a>	1. <b>FINDING:</b> WisDOT advises the subrecipient that it should enhance its oversight of the contractor by periodically inspecting the contractor operated Section 5311 funded vehicles to ensure they are properly maintained and equipped with the required safety equipment.	City to connect with Watertown Transit to do inspections on vehicles	90 days 8/7/2023	City to contact Streets Department and ask if a mechanic is available to do periodic inspection of the Transit Fleet.

SECTION 2: FINANCIAL MANAGEMENT – ACTION REQUIRED				
Compliance Area/Topic	Recommended Action	Action Steps	Timeline	Status
Accounting Practices/Internal Controls <a href="#">2 CFR Part 200.302 (b)(1)-(3) - "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards"</a>	2. <b>FINDING:</b> WisDOT advises the subrecipient to amend its Uniform Accounting Procedures Manual to include the following federal requirement: <ul style="list-style-type: none"><li>Procedures for determining the allowability of costs in accordance with Subpart E—Cost Principles and the terms and conditions of the Federal award consistent with 2 CFR part 200.302(b)(7).</li></ul>	A revision of Watertown's purchasing policy is underway. We will incorporate suggested language on cost availability for charges against federal funds.	90 days 8/7/2023	Being added into purchasing policy

SECTION 3: PROCUREMENT – NO RECOMMENDED ACTION				
Compliance Area/Topic	Recommended Action	Action Steps	Timeline	Status
	None			

SECTION 4: ASSET MANAGEMENT – ACTION REQUIRED				
Compliance Area/Topic	Recommended Action	Action Steps	Timeline	Status
Continuing Control of Assets (Vehicles) <a href="#">2 CFR Part 200.313</a>	3. <b>FINDING:</b> The review determined that there is inconsistency with the performance of preventive maintenance events. The 5,000-mile policy resulted in 68% on time, 24% late, and 8% early for oil changes on vehicle nos. 53 and 59. The subrecipient should strive to conduct oil changes consistent with the stated mileage interval. On time for the 5,000-mile interval would be 10% on either side of the stated interval (4,500-5,500 miles). FTA regulations call for at least 80% of PM events to be performed on time.	Follow up with PTI to make sure vehicles are on track with regular oil changes and other maintenance to be done within the recommended mileage interval. PTI to send QTR reports on maintenance work to fleet.	90 days 8/7/2023	PTI will work to get vehicles scheduled for maintenance work timely and report to the city on status

SECTION 5: SERVICE AND OPERATION – NO RECOMMENDED ACTION				
Compliance Area/Topic	Recommended Action	Action Steps	Timeline	Status
	None			

SECTION 6: SCHOOL BUS AND CHARTER – ACTION REQUIRED				
Compliance Area/Topic	Recommended Action	Action Steps	Timeline	Status
School bus transportation <a href="#">49 U.S.C. 5323(f)</a> School bus operations <a href="#">49 CFR 605</a>	School bus. 4. <b>Finding:</b> WisDOT found that the corner stop service provided trips exclusively to students. As outlined in the letter dated 7/6/23 from Ian Ritz, WisDOT requires the City to: 1) discontinue the use of federal and state public transit operating funds and federally funded public transit vehicles in providing corner stop service utilized exclusively by students; and 2) provide WisDOT with ridership reports and trip denial reports on a quarterly basis.	The City of Watertown will stop the corner service option to riders.	90 days from 7/6/23 (10/4/23)	Meeting with PTI on 7/12/2023. The corner service will not be used going forward. Topic will be relayed to the transit commission on 7/31/2023. City will discuss with City Attorney on contract stand points.

SECTION 7: CIVIL RIGHTS – ACTION REQUIRED				
Compliance Area/Topic	Recommended Action	Action Steps	Timeline	Status
Title VI <a href="#">FTA Circular 4702.1B</a>	<p>5. <b>FINDING:</b> WisDOT advises the subrecipient to update its Title VI Plan utilizing the WisDOT provided template. Note that the updated plan should be reviewed and approved by WisDOT before taking it before the subrecipient's Governing Body for approval and adoption. WisDOT will provide assistance with this task.</p> <p><a href="http://wisconsindot.gov/Pages/doing-bus/local-gov/astnce-pqms/transit/compliance/title6.aspx">http://wisconsindot.gov/Pages/doing-bus/local-gov/astnce-pqms/transit/compliance/title6.aspx</a></p>	Watertown has an upcoming video call with Becky at DOT to address these concerns. (May 25) City to update the Title VI policy.	90 days 8/7/2023	Updated Policy sent to Becky on 7/5 for review.
	<p>6. <b>FINDING:</b> The review found that the Contractor's website (<a href="https://passengertransit.net/PassengerCity?Name=Watertown">https://passengertransit.net/PassengerCity?Name=Watertown</a>) did not include a Title VI/ADA non-discrimination statement with no information regarding filing a complaint and who to contact for more information on the procedures for filing a Title VI or ADA complaint. While the subrecipient's website contained a Title VI non-discrimination statement and information for filing a complaint, it did not address ADA discrimination.</p> <p>With there being federal requirements for the posting of both Title VI and ADA non-discrimination statements and complaint procedures/information, WisDOT has developed a joint Title VI/ADA non-discrimination statement which also addresses the filing of a complaint. This statement is provided as an attachment to the email transmitting the CAP to the subrecipient.</p>	Watertown will put both Title VI and ada non-discrimination statement on website	90 days 8/7/2023	Website has been updated. Title VI update going to Council Aug 1. Complaint form added to Website and available at City Hall. (English and Spanish)

SECTION 8: AMERICANS WITH DISABILITIES ACT (ADA) – RECOMMENDED ACTION				
Compliance Area/Topic	Recommended Action	Action Steps	Timeline	Status
Americans with Disabilities Act (ADA) <a href="#">49 CFR part 37.3</a>	<p>7. <b>ADVISORY:</b> WisDOT advises the subrecipient to include the Wisconsin Relay Number on the City and contractor's websites to assist hearing impaired individuals.</p>	PTI currently has on their website. Watertown has added to theirs.	N/A	Has been updated

SECTION 9: MISCELLANEOUS PROVISIONS – NO RECOMMENDED ACTION				
Compliance Area/Topic	Recommended Action	Action Steps	Timeline	Status
	None			

**Signature section to be complete when ALL action steps are approved and marked complete by WisDOT**

**Subrecipient Acknowledgement of Completed Corrective Action and WisDOT Approval**

I hereby acknowledge that all action items as recommended by the Wisconsin Department of Transportation have been completed in cooperation and under the direction of the WisDOT Compliance Oversight Manager.

Subrecipient Name/Title	RLS & Associates, Inc. Name/Title	Date	