

Memorandum

Date:

April 9, 2019

To:

Rich Kula, Manager, Planning/Programming Branch (AGL-610)

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From:

John L. Mayfield Jr., Manager, Detroit Airports District Office (DET-ADO)

Prepared by:

Marlon Peña, Program Manager DET-ADO

Subject:

FAA Oversight of the 2018 Michigan State Block Grant Program (SBGP)

Management Process under AIP and NEPA

Purpose

Title 49 U.S.C. §47128 authorizes the Federal Aviation Administration's (FAA's) current State Block Grant Program (SBGP); FAA regulation 14 CFR, Part 156 discusses how FAA carries out the SBGP. FAA Order 5100.38D, Airport Improvement Program Handbook, Chapters 5, Section 5; Chapter 6, Section 2, provides guidance for administering the block grant. The Michigan SBGP Memorandum of Agreement (MOA) spells out procedures for executing the block grant program. Ongoing review of the SBGP by FAA is required by Title 49 U.S.C. §47128 to evaluate compliance with the regulation, order and MOA.

Scope

This audit reviews the internal control over grant documentation for sub-grants issued by the Michigan Department of Transportation, Office of Aeronautics' (MDOT AERO) grant management process. This review does not provide an opinion on the eligibility or justification of the individual projects.

Methodology

The DET ADO applied AIP Grant Documentation requirements to each sub-grant under the SBGP subject to this audit review. Oversight procedures are outlined in FAA Order 5100.38D, Chapters 5, Section 5; Chapter 6, Section 2, and the Michigan SBGP Memorandum of Agreement dated 3/25/2010. A spreadsheet was provided to MDOT AERO with a request for specific documentation. MDOT provided back-up documentation electronically (CD) that was requested by the ADO. Once the documentation was received, the ADO conducted a review of the additional documentation. The audit spreadsheet was populated with the document dates or N/A if the ADO determined document was not applicable to the project or funding year for the specific site/airport. There were no Discretionary funded projects identified in this audit. The DET-ADO audit included the following SBGP airports in Michigan:

- 1. Romeo (D98)
- 2. Sturgis (IRS)
- 3. Three Rivers (HAI)
- 4. Caro (CFS)
- 5. Grand Haven (3GM)
- 6. Hastings (9D9)
- 7. Howell (OZW)

SBGP Summary

Grant Agreement and Supporting Documentation

MDOT AERO utilizes an alternative method for SBGP sub-grant agreements and supporting documentation.

MDOT AERO conducts annual Michigan Airport Planning (MAP) meetings. At the MAP meeting, the Sponsor's draft Airport Capital Improvement Program (ACIP) is reviewed by attendees that include MDOT AERO staff (Block Grant Coordinator, Project Manager, Environmental, Land, and Planning), Sponsor representative(s), Airport Manager, Sponsor's consultant, and occasionally FAA ADO staff. Requested revisions to draft ACIP are provided to Sponsor based on discussions during meeting. These could include a request for additional justification documents as part of final ACIP submittal. A sponsor will generally leave their MAP meeting with guidance for what is proposed for funding based on eligibility and justification for the next few years.

Final ACIPs are typically due 1 month after their MAP meeting. Once final ACIP's are received, MDOT AERO finalizes the sponsor's programming in their Master ACIP. The final ACIP includes all block-grant airports and is provided to FAA ADO by December 15th.

For current program year, MDOT AERO will transfer project funding before the Michigan Aeronautics Commission for a sponsor's planned development project or projects. Timing of transfers is dependent on a number of factors such as funding availability, receipt of sponsor/consultant proposals and review, completion of environmental determination or land acquisition (if phased project), bidding schedules, etc. MDOT AERO cannot enter into a contract with an airport sponsor without prior approval of the Michigan Aeronautics Commission.

MDOT AERO Project Manager requests the appropriate federal project number to use through MDOT AERO Programming Section. Job Item number requests are made through MDOT AERO Planning to set up the project. With the new MDOT SOM SIGMA system effective for FY-18, MDOT-Aero no longer has item numbers for federally-funded projects.

When ready, the project manager requests a Sponsor Contract (SC) for the project. The SC is a contract between MDOT AERO and the Airport Sponsor. The request is made to the Programming Section. The SC consists of a checklist and Exhibit 1 that is initiated based on established fees and/or bids by the Programming Section. The SC checklist and Exhibit 1 are provided to the MDOT AERO Contract Administrator for contract processing.

The Contract Administrator sends an original and one copy of the SC to the Sponsor for signature. See copy of form letter. When the signed SC is received back from Sponsor, it is

executed by the MDOT AERO Director. Copies of executed SC are provided to the appropriate MDOT AERO staff and MDOT AERO Finance. A copy of the SC is also sent to the ADO electronically. Notice-to-Proceed is provided by MDOT AERO as necessary for start of project.

Sponsor Risk Level

MDOT AERO considers all their block grant locations to be nominal risk. Currently, there is no requirement to document risk levels for SBGP locations. However, the FAA conducted an assessment of MDOT AERO under the Sponsor Risk Policy that resulted in MDOT AERO receiving a Nominal Risk Rating.

Preliminary Documentation

Preliminary documentation includes the Project Evaluation Review and Documentation Analysis (PERADA) for discretionary grants only, FAA Form 5010, environmental documentation, coded program sketch, applicable reimbursable agreement(s), and any applicable TSA security approvals. PERADA and master airport record data is reviewed annually during the MAP meetings. Environmental documentation is filed with the sub-grants. Typically, Sponsors provide a location sketch for their proposed projects as part of their ACIP submittal. During the development of the project, the Programming Engineer and/or Project Managers could receive additional sketches, drawings, and pictures for planned work. MDOT AERO no longer sends formal "Programming" letters to Sponsors when funding is available. Typical communication is done in person at the MAP meetings, through email and/or phone. AERO PM is also used to identify type of funding for the projects.

Funding, Financial and Progress Documentation

For each funded sub-grant, the MDOT AERO Project Managers (PMs) provide periodic site inspections and project status reports regularly. The PMs are actively involved with the projects so they are aware of the general activities as the project progresses. The MDOT AERO uses a computer software suite of programs called FieldManager for project management tracking, payment and bidding only for MDOT-let projects, Local-let projects are handled through the sponsor. This software maintains the records for all of the construction pay items and Inspector's Daily Reports (IDR). This system is updated for MDOT AERO Project Managers when a consultant submits a pay request for the construction work they are supervising. MDOT AERO still maintains original signature change orders in the PM files but payments and IDR are maintained electronically within FieldManager. MDOT AERO does not use a Summary of Change Orders format in their project tracking. Change Order documentation is downloaded into FieldManager and tracked by individual project number. MDOT submits pay requests for work accomplished under projects, through the Delphi system for reimbursement under each SBGP AIP grant. The ADO tracks SBG Delphi pay requests and reviews/approves pay request within the final 10% for each grant based on the Grant Payment Policy.

Sponsor's Certification of Consultant Selection

MDOT AERO signed an umbrella master terms and conditions which covers all the SBGP locations; this document is on file at the DET ADO with each SBGP-Grant. However, each sponsor must sign individual terms and conditions agreement prior to accepting AIP grants through MDOT AERO. The FAA does not participate in the Consultant Selection process per the MOA with MDOT.

Construction Management

MDOT AERO Project Managers have access/rights to review and resolve aeronautical studies, including construction safety phasing plans within the Obstruction Evaluation/Airport Airspace Analysis (OE/AAA) website. MDOT AERO issues all airspace determinations for projects under the SBGP. This process is subject to change in **FY-19** per the latest requirements under the latest SBGP AC. Airspace determination comments are also discussed during each of the preconstruction meetings attended by the Project Managers to make sure everyone involved in the construction project is aware of these concerns. The airspace case number and determination date are provided to document MDOT AERO's review and approval of the aeronautical studies. Airspace Determination letters are issued by the MDOT Airspace Specialist in the OE/AAA for future reference. This process is also subject to change in **FY-19** per the latest requirements under the latest SBGP AC. The ADO informs MDOT AERO on OE/AAA updates and new airspace guidance in general. MDOT AERO airspace review and determination process is based on FAA policy and latest CSPP SOP guidance.

Plans and Specifications

MDOT AERO signed an umbrella master terms and conditions which covers all the SBGP locations; this document is on file at the DET-ADO. However, each sponsor must sign an individual terms and conditions agreement prior to accepting AIP grants through the MDOT AERO. In addition, MDOT AERO coordinates all Modification-to-Design/Construction Standards for FAA approval.

Engineer's Estimate, Bid Tabulation and Supporting Documents

Appropriate engineering estimates were provided. Bid tabs were provided for all non-planning or land acquisition grants.

Land

MDOT AERO signed an umbrella master terms and conditions which covers all the SBGP locations; this document is on file at the DET-ADO. However, each sponsor must sign an individual terms and conditions agreement prior to accepting AIP grants through the MDOT AERO.

Construction/Equipment Contracts

MDOT AERO signed an umbrella master terms and conditions which covers all the SBGP locations; this document is on file at the DET-ADO. However, each sponsor must sign an individual terms and conditions agreement prior to accepting AIP grants through the MDOT AERO.

Change Order/Supplement Agreement

Change Orders/supplement agreements were provided for all appropriate sub-grants.

Planning

The ADO did not conduct a review from a planning standpoint, due to the fact there were no planning projects for the 7 airports being audited for the time period.

Environmental

The DET ADO applied current FAA environmental guidance describe in FAA Order 5050.4B "National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions" to each grant/sub-grant subject to this audit review. The ADO concur that the environmental documentation are acceptable per FAA Order 5050.4B. A summary of this review is included in Attachment 2.

Final Project Acceptance and Inspection Documents

Appropriate sponsor's certification of construction project final acceptance is required by MDOT AERO.

Owner's Final Report

MDOT AERO provides owner's final report with their block grant closeout not individual subgrants.

FAA Final Cost Review/Final Project Report

For NPE & SA block grant closeouts, MDOT provides the three page closeout report. For Discretionary block grant closeouts, MDOT provides the 18-page closeout report (see FAA Final Cost Review/Final Project Report). However, there were no Discretionary projects under this audit.

Contracts for Personal Services

Appropriate engineering and/or architectural contracts were provided.

Local Audit Reports

There were no local audit reports provided for any of these locations.

Photographs

Based on the latest AIP order 5100.38D pre and post construction photographs are no longer required for AIP projects and therefore, photographs were not requested under this audit. However, the MDOT AERO PMs who provide periodic site inspections and project status reports regularly do collect photographs or acquire them from the onsite personnel. The Project Managers are actively involved with the projects so they are aware of the general activities as the project progresses.

Schedule of Findings

There were no findings identified in this audit report that are specifically related to the 2018 Michigan State Block Grant Program (SBGP) Management Process under AIP and NEPA.

Conclusion

Overall, the Michigan Department of Transportation, Office of Aeronautics' (MDOT AERO) grant management process is being followed for the seven airports audited.

Attachments

Attachment 1: SBGP 2018 Airport Audit Analysis Spreadsheet

Attachment 2: SBGP 2018 Environmental Audit Analysis Spreadsheet

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	Clack Cealing &	N/A	N/A	NA	N/A	N/A	N/A	N/A	NA	N/A
	SBG 15 NPE CO funds	N/A	N/A	NA	N/A	N/A	N/A	NA	N/A	N/A
	SBG 16 NPE CO funds	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	SBG 17 NPE CO funds	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
B-26-0097	Install AWOS - replace components	FINAL	N/A	N/A	N/A	08/04/15	N/A	10/15/14	N/A	N/A
	a - design; nt Renairs -		NI/A	NIA	N/A	05/07/18	NIA	00/27/16	N/A	N/A
_			N/A	NA	N/A	N/A	N/A	N/A	NA	NA
	SBG 15 NPE CO funds	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	SBG 16 NPE CO funds	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2017-SBGP-9817 N/A		N/A	N/A	NA	N/A	N/A	N/A	N/A	N/A	A/N
	Rehabilitate Runway 9/27 (4,000' x 75') including guidance signs -	200 CC 1/0/17	NI/A	NI/A	NI/A	01/00/17	NI/A	40/42/45	NI/A	NA
+	SBG 14 NPE CO funds	N/A	N/A	NA	NA	N/A	NA	N/A	NA	NA
	SBG 15 NPE CO funds	N/A	NA	NA	N/A	N/A	N/A	NA	NA	NA
	SBG 16 NPE CO funds	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	SBG 17 NPE CO funds	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Rehab Runway 5/23 Crack Repair - Construction	FINAL	NA	NA	N/A	8/18/2015	N/A	10/21/14	N/A	NA
	Construct Taxiway - NE Hangar Taxiways - Design	FINAL SC 6/15/17	N/A	N/A	N/A	6/15/2016	N/A	10/22/15	N/A	N/A
	Install Plinway inhting 6/24 including guidence signs - design	exe 00 0/10/17	N/A	N/A	N/A	03/19/18	NA	10/12/17	NA	NA
	SBG 15 NPE CO funds	N/A	NA	NA S	NA	N/A	NA	NA	NA	NA
	SBG 16 NPE CO funds	N/A	NA	NA	NA	N/A	NA	NA	NA	NA
	SBG 17 NPE CO funds	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
B-26-003	Runway 27 (parcel E6	exe SC 1/8/18	NA	NA A	N/A	01/08/18	N/A	08/31/16	NA	NA
NA	SBC 13 NDE CO funds	N/A	NA	NA	NA	NA	NA	NA	NA	NA
N/A	SRG 13 NPE CO funds	N/A	NA	N/A	N/A	N/A	N/A	N/A	N/A	NA S
NA	SBG 14 NPE CO funds	NA	NA	NA	NA	N/A	NA	NA	NA	NA
N/A	SBG 15 NPE CO funds	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2014-SBGP-9014 B-26-0043-2314	Rehabilitate Taxiway A, C & Hangar Taxiways - design	FINAL	N/A	N/A	N/A	12/18/14	N/A	11/12/13	N/A	N/A
	1	FINAL	N/A	NA	N/A	08/06/15	N/A	09/15/14	N/A	NA
	ctor w/ displace	200 20 20 20 20 20 20 20 20 20 20 20 20		No		77177	200	00/07/16		
4	Construct SRE building - construction	exe SC 10/2/17	NA	NA	NA	10/2/2017	NA	09/07/16	NA	N/A
200	SBG 17 NPE CO funds	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Improve Airport Drainage - Twy A & Rwy 13/31 underdrains - construction	FINAL	N/A	N/A	N/A	7/23/2014	N/A	11/13/13	N/A	N/A
	Runway 13/31 crack & J	FINAL	N/A	N/A	N/A	8/20/2015	N/A	09/04/14	NA	N/A
4		NA	NA	NA	NA	N/A	NA	NA	NA	NA
	SBG 16 NPE CO funds	NA	N/A	NA	NA	N/A	NA	NA	NA	N/A
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N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A			NA	NA	N/A	N/A	N/A	N/A	N/A	N/A	N/A		NIA	NIA	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Plan	nent		
N/A	N/A	N/A	04/01/15	03/01/14	N/A	08/22/17	N/A	05/13/15	N/A	N/A	N/A	N/A	N/A	10/16/1/	NA	N/A	N/A	N/A	12/11/18	N/A	12/12/18	N/A	N/A	N/A		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Plan	Construction Phasing		
N/A	N/A	N/A	06/10/15	02/03/14	N/A	07/24/17	N/A	05/13/15	N/A	N/A	N/A	N/A	N/A	10/23/17	N/A	N/A	N/A	N/A	12/11/18	N/A	12/12/18	N/A	N/A	2/2		N/A	A/N	N/A	N/A	N/A	N/A	03/12/15	N/A	N/A	N/A	N/A	N/A	Determination	Airspace		
N/A	N/A	N/A	N/A	03/19/14	N/A	7/25/2017	05/23/17	4/3/2015	10/23/2014	N/A	N/A	NA	N/A	04/10/1/	N/A	N/A	N/A	12/11/18	12/11/18	12/11/18	12/12/18	N/A	NA	2/2	1014/2010	10/4/2016	N/A	N/A	N/A	N/A	2/23/2017	11/24/2014	N/A	N/A	N/A	N/A	part of MDOT statewide	Agreement	Design	Estimate or	Engineer's
N/A	N/A	N/A	N/A		N/A	8/4/2017	N/A	6/5/2015	N/A	N/A	N/A	N/A	N/A	10/16/1/	N/A	N/A	N/A	12/11/2018	12/11/18	N/A	12/12/18	N/A	N/A	2/2		NIA	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	5/5/2017	Tabulation			
N/A	N/A	N/A	N/A	N/A	N/A	NA	N/A	N/A	N/A	N/A	N/A	NA	N/A		NA	N/A	N/A	NA	NA	NA	NA	NA	NA			210	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Appraisals	Review	Appraisals	Land
N/A	N/A	N/A	N/A	N/A	N/A	NA	N/A	N/A	N/A	N/A	NA	NA	N/A	N/A	NA	NA	N/A	N/A	N/A	NA	N/A	NA	N/A	2/2			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Judgement			Land Negotiated
N/A	N/A	N/A	N/A	N/A	N/A	07/28/17		N/A	N/A	N/A	N/A	N/A			NA	N/A	N/A	NA	N/A	N/A	N/A	N/A	NA			NIA	NA	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Waiver	American	Buy	
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N/A	N/A	N/A	10/16/15	10/07/14	N/A	11/20/2017	N/A	10/20/15	N/A	N/A	N/A	N/A	N/A	06/26/18	N/A	N/A	N/A	N/A	12/11/18	NA	12/12/18	NA	N/A	NA		NIA	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Inspection	Engineer's Final	Sponsor or	
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	NA	NA	N/A	NA	N/A	N/A	N/A	N/A	NA	NA	N/A	N/A	N/A	N/A	NA		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	only	Discretionary	271)	Report (final SF-270 or SF-
N/A	N/A	N/A	03/07/18	04/28/17	N/A	N/A	N/A	08/02/17	08/03/17	N/A	NA.	N/A	N/A	NA	N/A	N/A	N/A	N/A	N/A	11/07/17	04/28/17	N/A	NA	NA	EFA IO/I//IO	EEA 10/17/18	N/A	N/A	N/A	N/A	N/A	07/18/17	N/A	N/A	N/A	N/A	pending closeout	closed	final if	Financial	MDOT
N/A	N/A	N/A	SBGP 8813, 9014 & 9215	SBGP 8512 & 8813	N/A	N/A	N/A	SBGP 8813, 9014 & 9215	SBGP 9014	N/A	N/A	N/A	NA	NA	N/A	N/A	N/A	NA	N/A	SBGP 9014	SBGP 8813 & 9014	N/A	NA	N/A			N/A	N/A	N/A	N/A	N/A	SBGP 9014	N/A	N/A	N/A	N/A	SBGP 9014	if closed	Reference Number	Block Grant	Closeout Documentation or