



U.S. Department
of Transportation

Transportation Management Area Planning Certification Review

Federal Highway
Administration

Federal Transit
Administration

Indianapolis Metropolitan Planning Area



October 7, 2022

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1.0 EXECUTIVE SUMMARY

On June 7 & 8, 2022, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA), which will be referred to as the Federal Review Team (FRT), conducted the certification review of the transportation planning process for the Indianapolis urbanized area. FHWA and FTA are required to jointly review and evaluate the transportation planning process for each urbanized area over 200,000 in population at least every four years to determine if the process meets the Federal planning requirements.

1.1 Previous Findings and Disposition

Certification reviews for the Indianapolis, IN urbanized area have been conducted since the early 1990's. Subsequent reviews were conducted in 2002, 2006, 2010, 2014 and 2018 respectively. The 2018 Certification Review findings and their disposition are provided in Appendix B and summarized as follows:

| Finding | Action | Corrective Actions/ Recommendations | Disposition |
|---|----------------|---|-------------|
| The structure of IMPO is in compliance with the requirements of 23 CFR 450.314(a). | Recommendation | The IMPO has expressed deep concerns over how the FHWA Planning (PL) funds are distributed. INDOT and the IMPO should work together to determine how this may be resolved. | Unresolved |
| The IMPO Title VI Plan meets the requirements of the Civil Rights Act of 1964 and Executive Order #12898. | Recommendation | IMPO should incorporate these strategies into the IMPO public involvement procedures. | Resolved |
| | Recommendation | IMPO should use a four-factor analysis, as described in USDOT guidance, to assess language needs and decide reasonable steps to take to ensure meaningful access for LEP persons. | Resolved |

1.2 Summary of Current Findings

The current review found that the metropolitan transportation planning process conducted in the Indianapolis urbanized area meets with corrective action the Federal planning requirements.

As a result of this review, FHWA and FTA are certifying the transportation planning process conducted by the Indianapolis Department of Transportation (INDOT), the Indianapolis Metropolitan Planning Organization (IMPO), as well as the Indianapolis Public Transit Corporation known as IndyGo, and the Central Indiana Regional Transportation Authority (CIRTA), the transit providers in the Indianapolis



urbanized area. Below are the primary findings, including the corrective action and recommendations in this report that warrant close attention and follow up, as well as areas in which IMPO is performing very well that are to be commended.

| Review Area | Finding | Action | Corrective Actions/ Recommendations/ Commendations | Resolution Due Date |
|---|--|------------------------------------|---|------------------------|
| MPO Structure and Agreements 23 U.S.C. 134(d) 23 CFR 450.314(a) | The organizational framework is compliant with the federal planning regulations. | Commendation Recommendation | The FRT commends the IMPO on the development of clear procedures and resources for use by local public agencies in requesting funds and implementing projects with federally exchanged funds issued by IMPO. The FRT recommends that the MPO coordinate with INDOT to develop strategies and/or methods to streamline future updates to planning agreement(s). | |



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|---|---|-----------------------|--|--|
| <p>Metropolitan Transportation Plan (MTP) 23 U.S.C. 134(c), (h) & (i) 23 CFR 450.324</p> | <p>The IMPO MTP meets the requirements of 23 U.S.C. 134(c), (h) & (i), 23 CFR 450.324, and 23 CFR 450.306(d).</p> | <p>Recommendation</p> | <p>The FRT recommends INDOT coordinate with the IMPO in the development of future MTP funding projections, and that projections include statewide maintained revenues that could reasonably be used to improve the IMPO/INDOT transportation system.</p> | |
| <p>Performance Based Planning and Programming (PBPP) 23 U.S.C 134(h)(2) 23 CFR 450.306(d), 450.314(h),450.324(f), 450.326(d) & 450.340.</p> | | <p>Recommendation</p> | <p>The FRT recommends that the IMPO include a clear breakdown of projected revenues and estimated expenses to demonstrate fiscal constraint.</p> | |
| | | <p>Recommendation</p> | <p>In the next update to the MTP, the IMPO should include a system performance report detailing the progress achieved in meeting the performance targets in comparison with the baseline data as outlined in 23 CFR 450.324 (f) (3) and (4)).</p> | |
| <p>Transit Asset Management Plan 49 U.S.C. 5326</p> | <p>The IMPO TAM meets the requirements of 49 U.S.C. § 5326.</p> | <p>Commendation</p> | <p>The IMPO is commended for providing leadership, support, and technical assistance to their partners while completing their 2018 TAM plan to meet the MAP-21 requirements.</p> | |



| | | | | |
|---|--|---|---|--|
| <p>Coordinated Public Transit Human Services Transportation Plans/Enhanced Mobility of Seniors and Individuals with Disabilities Program Management Plan 49 U.S.C. 5310</p> | <p>The IMPO Coordinated Public Transit Human Services Transportation Plan and Program Management Plan meet the requirements of 49 U.S.C. § 5310.</p> | <p>Commendation</p> | <p>The IMPO is commended for their leadership and collaborative efforts with IndyGo and INDOT in the development of the Coordinated Public Transit Human Services Transportation Plan.</p> | |
| <p>Transportation Improvement Program (TIP) and Annual List of Obligated Projects (ALOP) 23 U.S.C. 134(c), (h) & (j) 23 CFR 450.326 23 U.S.C. 134(j)(7) 23 CFR 450.334 23 U.S.C. or 49 U.S. C. Chapter 53</p> | <p>The IMPO TIP and ALOP substantially meet the requirements of 23 U.S.C. 134(c), (h) & (j), 23 CFR 450.326, and 23 CFR 450.334.</p> | <p>Recommendation</p> <p>Recommendation</p> <p>Recommendation</p> | <p>The FRT Team recommends the IMPO revise public meetings for the TIP to ensure that those public meetings are held at convenient and accessible locations and times as required in 23 CFR 450.316 (1) (v).</p> <p>The IMPO should ensure the public participation plan outlines a method for making the TIP accessible to audiences that may not have web access, and/or may have other circumstances or disabilities that prohibit or limit their access to the online format.</p> <p>INDOT, IMPO, and the respective transit operators should coordinate to ensure the minimum project descriptive information for DOT initiated projects and transit projects is available and published in the TIP and ALOP as defined in the regulations referenced above.</p> | |



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|--|---|-------------------|---|--|
| Public Participation 23 U.S.C. 134(i)(6) 23 CFR 450.316 & 450.326(b) | The IMPO Participation Plan meets the regulatory requirements found in 23 CFR 450.316. | Recommendation | The FRT recommends IMPO consider allowing a virtual option for public meetings, including policy committee meetings. | |
| Environmental Mitigation/Planning Environmental Linkage 23 U.S.C. 134(i)(2)(D) 23 CFR 450.324(f)(10) 23 U.S.C. 168 Appx. A 23 CFR Part 450 | The FHWA/FTA Review Team finds that the MPO environmental mitigation does not meet the requirements of 23 U.S.C. 134(i)(2)(D)23 and CFR 450.324(f)(10). | Corrective Action | The review team finds the MPO has not demonstrated consultation with environmental resource agencies in the transportation planning process and does not meet the requirements outlined in 23 CFR 450.324(f)(10). | |
| Congestion Management Process / Management and Operations 23 U.S.C. 134(k)(3) 23 CFR 450.322 | The IMPO meets the requirements related to management and operations, and ITS. | Recommendation | It is suggested IMPO review the security of the information technology systems (ITS) and consider discussing vehicle connectivity and automation into the region's ITS Architecture Plan. | |

Details of the certification findings for each of the above items are contained in this report.



2.0 INTRODUCTION

2.1 Background

Pursuant to 23 U.S.C. 134(k) and 49 U.S.C. 5303(k), the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) must jointly certify the metropolitan transportation planning process in Transportation Management Areas (TMAs) at least every four years. A TMA is an urbanized area, as defined by the U.S. Census Bureau, with a population of over 200,000. In general, the reviews consist of three primary activities: a site visit, a review of planning products (in advance of and during the site visit), and preparation of a Certification Review Report that summarizes the review and offers findings. The reviews focus on compliance with Federal regulations, challenges, successes, and experiences of the cooperative relationship between the MPO(s), the State DOT(s), and public transportation operator(s) in the conduct of the metropolitan transportation planning process.

The Certification Review process is only one of several methods used to assess the quality of a regional metropolitan transportation planning process, compliance with applicable statutes and regulations, and the level and type of technical assistance needed to enhance the effectiveness of the planning process. Other stewardship and oversight activities provide opportunities for this type of review and comment, including Unified Planning Work Program (UPWP) approval, the Metropolitan Transportation Plan (MTP), metropolitan and statewide Transportation Improvement Program (TIP) findings, air-quality (AQ) conformity determinations (in nonattainment and maintenance areas), as well as a range of other formal and less formal interactions provide both FHWA/FTA an opportunity to comment on the planning process. The results of these other processes are considered in the Certification Review process.

While the Certification Review report itself may not fully document those many intermediate and ongoing checkpoints, the “findings” of Certification Review are, in fact, based upon the cumulative findings of the entire review effort.

The review process is individually tailored to focus on topics of significance in each metropolitan planning area. Federal reviewers prepare Certification Reports to document the results of the review process. The reports and final actions are the joint responsibility of the appropriate FHWA and FTA field offices, and their content will vary to reflect the planning process reviewed, whether or not they relate explicitly to formal “findings” of the review. To encourage public understanding and input, FHWA/FTA will continue to improve the clarity of the Certification Review reports.

2.2 Purpose and Objective

Since the enactment of the Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991, the FHWA and FTA, are required to jointly review and evaluate the transportation planning process in all urbanized areas over 200,000 population to determine if the process meets the Federal planning requirements in 23 U.S.C. 134, 40 U.S.C. 5303, and 23 CFR 450. The Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), extended the minimum allowable frequency of certification reviews to at least every four years.



The IMPO is the designated MPO for the Indianapolis urbanized area. The INDOT is the responsible State agency and IndyGo and CIRTAs are the responsible public transportation operators. Current membership of the IMPO consists of elected officials and citizens from the political jurisdictions in 34 cities, towns and counties. The study area includes the entire City of Indianapolis as the largest population center.

Certification of the planning process is a prerequisite to the approval of Federal funding for transportation projects in such areas. The certification review is also an opportunity to provide assistance on new programs and to enhance the ability of the metropolitan transportation planning process to provide decision makers with the knowledge they need to make well-informed capital and operating investment decisions.

3.0 SCOPE AND METHODOLOGY

3.1 Review Process

This report details the IMPO FY 2022 review, which consisted of a desk review, a formal (virtual) site visit, and a public involvement opportunity, conducted on June 7 and 8, 2022. Participants in the review included representatives of FHWA, FTA, INDOT, IndyGo, and CIRTAs. A full list of participants is included in Appendix A.

A desk audit of current documents and correspondence was completed prior to the site visit by FHWA and FTA which comprise the Federal Review Team (FRT). In addition to the formal review, routine oversight mechanisms provide a major source of information upon which to base the review findings. The certification review covers the transportation planning process conducted cooperatively by the IMPO, State DOT, and public transportation operators. Background information, current status, key findings, and recommendations are summarized in the body of the report for the following subject areas selected by FHWA and FTA staff for the formal (virtual) review:

- MPO Structure and Agreements
- Metropolitan Transportation Plan (MTP)
- Transit Planning
- Transportation Improvement Program (TIP) and Annual Listing of Obligated Projects (ALOP)
- Public Participation
- Civil Rights (Title VI, EJ, LEP, ADA)
- Consultation and Coordination
- Environmental Mitigation/Planning Environmental Linkage
- Air Quality
- Congestion Management Process / Management and Operations

3.2 Documents Reviewed

The following MPO documents were evaluated as part of this planning process review:

- IMPO Website: <https://www.indympo.org/>



- Memorandum of Agreement between IMPO, INDOT, and IndyGo, 2014
- Memorandum of Agreement between IMPO, MCCOG (Anderson Area MPO), and CAMPO (Columbus Area MPO), 2015
- Organizational Bylaws, 2021
- FY 2021 and FY2022 Unified Planning Work Program for the IMPO
- MPO Metropolitan Transportation Plan-2045 and 2050
- MPO FY-2020-2023 and FY2022-2025 TIP and Self-Certifications
- 2020 and 2021 Obligated Projects Listing
- Transit Asset Management Plan
- Coordinated Public Transit-Human Services Plan-2017, 2021
- Congestion Management Process (included in MTP documents)
- Title VI Program and Assurances
- Participation Plan, 2021
- IMPO ITS Architecture, 2014
- Public Comment Form submissions (Appendix C)



4.0 PROGRAM REVIEW

4.1 MPO Structure and Agreements

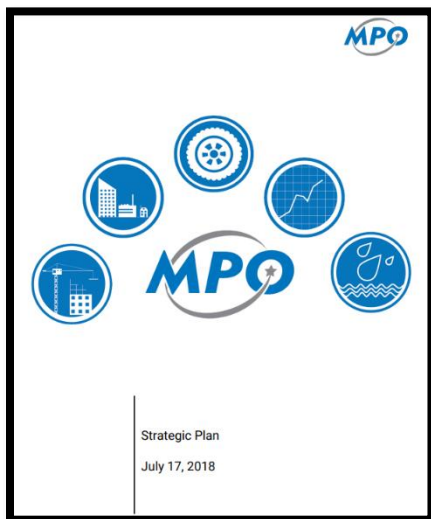
4.1.1 Regulatory Basis

23 U.S.C. 134(d) and 23 CFR 450.314(a) state the MPO, the State, and the public transportation operator(s) shall cooperatively determine their mutual responsibilities in carrying out the metropolitan transportation planning process. These responsibilities shall be clearly identified in written agreements among the MPO, the State, and the public transportation operator serving the MPA. Further, 23 CFR 450.314(h) states that the MPO, the State, and the public transportation operator(s) shall jointly develop specific written provisions for cooperatively developing and sharing information related to transportation performance data, the selection of performance targets, the reporting of performance targets, the reporting of performance to be used in tracking progress toward attainment of critical outcomes for the region of the MPO, and the collection of data for the State asset management plans for the National Highway System.

4.1.2 Current Status

The IMPO planning area consists of the federally designated urbanized area of Indianapolis, and covers eight (8) counties, 11 cities, and 22 towns. Transit operators include the Indianapolis Public Transportation Corporation, known as IndyGo, and the Central Indiana Regional Transportation Authority (CIRTA).

With the adoption of the 2018 MPO Strategic Plan, IMPO stakeholders and members agreed to expand the MPO's charge to transportation planning, land use, housing, water, and economic development. In order to expand IMPO's planning responsibilities, the MPO set in motion a process, which was noted in the 2018 certification report, to end its hosting agreement with the City of Indianapolis and become an independent organization. In June 2020, IMPO was redesignated by the Governor as standalone entity. In addition to MPO tasks and deliverables, IMPO will now conduct land use, water, and economic development planning activities and tasks. In June 2020 the MPO updated its bylaws which describes



the new organizational structure, and the bylaws were last revised in December 2021. The IMPO has three standing committees, the Transportation Policy Committee, the Transportation Technical Committee, and the Executive Committee. The Transportation Policy Committee is comprised of elected officials and town managers and is responsible for approving all federally required IMPO transportation actions. The Transportation Technical Committee is comprised of planning stakeholders who provide expertise on proposed transportation policies and plans. The Executive Committee is a small, elected group of Policy members that oversee the operations of the IMPO.

The most recent planning memorandum of agreement (MOA) by and between IMPO, INDOT, and IndyGO is included as an



Appendix to the most recent MPO Unified Planning Work Program (UPWP). The agreement outlines the mutual responsibilities of each agency in carrying out the metropolitan transportation planning process in accordance with 23 CFR 450.314(a), and the specific written provisions for cooperatively developing and sharing information related to transportation performance data, as well as the selection and reporting of performance targets in accordance with 23 CFR 450.314(h). However, the agreement, signed in 2014, is outdated with reference to MAP-21 rather than the FAST Act or the most recent legislation, the Infrastructure Investment and Jobs Act (IIJA). It was noted during the site meeting that several changes have occurred since 2014, and that the MOA needs to be updated to reflect the most recent transportation legislation and associated requirements (Infrastructure Investments and Jobs Act, IIJA), as well as the new MPO designation and structure. The existing MOA addresses performance measures and is supplemented by INDOT's chapter in the *Planning Procedures Manual* that specifies how INDOT, the MPOs and transit operators will develop, share data, select, report and monitor performance targets. A corrective action was issued as part of the Federal Planning Finding for the FY22-26 STIP, and INDOT is working with the MPOs to develop updated MOAs.

In addition to the redesignation agreement, the IMPO executed a federal exchange program agreement with INDOT that will take effect in 2025. The IMPO will be responsible for administering projects with the exchanged funds and has developed a detailed guidebook to walk their local communities through the project delivery process once funds have been awarded by the IMPO.

Regarding the existing PL funds agreement and distribution, as noted in the 2018 report, the current distribution methodology for FHWA PL funds is viewed by the IMPO as penalizing and limiting planning and outreach efforts in the MPO area, including outreach to underserved and other vulnerable populations. According to the existing formula, any MPO receiving over 20% of the total PL funding is no longer eligible to participate in the second tier of funding distribution and instead receives a flat \$50,000. Indianapolis is the only MPO that has ever qualified and been subject to this restriction to date. Though several conversations have ensued, and the IMPO has made efforts to develop and suggest alternative distribution formulas based on examples from other states, the formula and associated restrictions remain unchanged. The data from the 2020 census will be published and made available over the next few months, which may present another opportunity for INDOT and the MPOs to review the PL formula.

4.1.3 Findings: The organizational framework is compliant with the federal planning regulations. During the calendar years 2020, 2021, and 2022 FHWA and FTA conducted several TMA Certification Reviews. In all of the reviews, it was noted that the planning agreements have not been updated since 2014 and 2015, and do not reflect recent regulations and regulatory requirements (including the FAST Act and IIJA), and regulatory requirements (as required in 23 CFR 450.314). A corrective action was issued as part of the Federal Planning Finding for the FY22-26 STIP, and INDOT is working with the MPOs to develop updated MOAs.

Commendation: The FRT commends the IMPO on the development of clear procedures and resources for use by local public agencies in requesting funds and implementing projects for federally exchanged funds issued by IMPO.

Recommendation: The FRT recommends that the MPO coordinate with INDOT to develop strategies and/or methods to streamline future updates to planning agreement(s).



4.2 Metropolitan Transportation Plan and Performance Based Planning and Programming

4.2.1 Regulatory Basis

23 U.S.C. 134(c), (h) & (i) and 23 CFR 450.324 set forth requirements for the development and content of the Metropolitan Transportation Plan (MTP). Among the requirements are that the MTP address at least a 20-year planning horizon and that it includes both long- and short-range strategies that lead to the development of an integrated and multi-modal system to facilitate the safe and efficient movement of people and goods in addressing current and future transportation demand.

The MTP is required to provide a continuing, cooperative, and comprehensive multimodal transportation planning process. The plan needs to consider all applicable issues related to the transportation systems development, land use, employment, economic development, natural environment, and housing and community development.

23 CFR 450.324(c) requires the MPO to review and update the MTP at least every four years in air quality nonattainment and maintenance areas and at least every 5 years in attainment areas to reflect current and forecasted transportation, population, land use, employment, congestion, and economic conditions and trends.

Under 23 CFR 450.324(f), the MTP is required, at a minimum, to consider the following:

- Projected transportation demand
- Existing and proposed transportation facilities
- Operational and management strategies
- Congestion management process
- Capital investment and strategies to preserve transportation infrastructure and provide for multimodal capacity
- Design concept and design scope descriptions of proposed transportation facilities
- Potential environmental mitigation activities
- Pedestrian walkway and bicycle transportation facilities
- Transportation and transit enhancements
- A financial plan

23 U.S.C. 150(b) identifies the following national goals for the focus of the Federal-aid highway program: Safety, Infrastructure Condition, Congestion Reduction, System Reliability, Freight Movement and Economic Vitality, Environmental Sustainability, and Reduced Project Delivery Delays. Under 23 U.S.C. 134(h)(2), the metropolitan planning process shall provide for the establishment and use of a performance-based approach to transportation decision-making to support the national goals, including the establishment of performance targets.

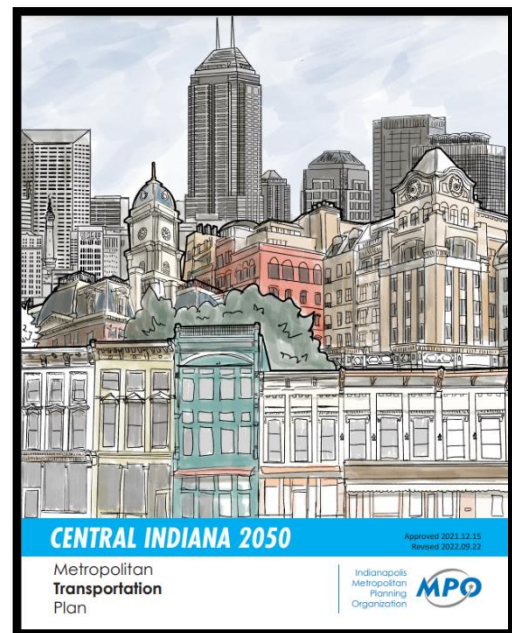
23 CFR 450.306(d) states that each MPO shall establish performance targets to support the national goals and track progress towards the attainment of critical outcomes. Each MPO shall coordinate with



the relevant State to ensure consistency, to the maximum extent practicable, and establish performance targets not later than 180 days after the State or provider of public transportation establishes its performance targets. The selection of performance targets that address performance measures described in 49 U.S.C. 5326(c) and 49 U.S.C. 5329(d) shall be coordinated to the maximum extent practicable, with public transportation providers to ensure consistency with the performance targets that public transportation providers establish under 49 U.S.C. 5326(c) and 49 U.S.C. 5329(d). Additionally, each MPO shall integrate the goals, objectives, performance measures, and targets from other performance-based plans and programs into the metropolitan transportation planning process.

4.2.2 Current Status

Since the last review, IMPO developed an updated Metropolitan Transportation Plan: Central Indiana 2050. It was approved by the IMPO Policy Board on December 15, 2021, and found to conform for air quality to the 1997 Ozone Standard on January 24, 2022. The Metropolitan Transportation Plan (Central Indiana 2050) for the Indianapolis, IN urbanized area documents the cooperative transportation planning process of the IMPO. Informed by input from public officials, agency staff and citizens of the region, Central Indiana 2050 is a guide for the implementation of multimodal transportation improvements, policies, and programs in the Metropolitan Planning Area. The plan includes four themes, each with goals, objectives, and performance measures: MOVE, PROSPER, MAKE SAFE, and SUSTAIN. The MOVE theme focuses on roadway, bikeway, and sidewalk connectivity, support for transit initiatives, and addressing system performance and congestion. The PROSPER theme focuses on accessibility to transportation options (such as transit) and efficiency of goods and freight movement. The MAKE SAFE theme focuses on facility condition (road/bridge/transit assets), and reduction of serious injuries and fatalities. The SUSTAIN theme recommends support for non-motorized (multi-modal) options to improve air quality.



The IMPO considered and successfully implemented the following in the plan development process:

- Projected transportation demand
- Existing and proposed transportation facilities
- Operational and management strategies
- Congestion management process
- Capital investment and strategies to preserve transportation infrastructure and provide for multimodal capacity
- Design concept and design scope descriptions of proposed transportation facilities
- Pedestrian walkway and bicycle transportation facilities
- Transportation and transit enhancements
- A financial plan



With regard to the financial plan, while revenues and funding sources are clearly identified, there is limited information available to assess and compare estimated costs, including operations and maintenance estimated costs and revenues as required in 23 CFR 450.324 (11)(i). For purposes of transportation system operations and maintenance, the financial plan shall contain system-level estimates of costs and revenue sources that are reasonably expected to be available to adequately operate and maintain the Federal-aid highways (as defined by 23 U.S.C. 101(a)(5)) and public transportation (as defined by title 49 U.S.C. Chapter 53).

There is no discussion related to environmental mitigation efforts and or practices in Central Indiana 2050. More discussion about this topic is included in a separate section of this report.

In the development of Central Indiana 2050, the IMPO employed several outreach and engagement methods to gather input, including a public survey, online mapping and comment tool, advisory committee meetings, and a formal public hearing. The comments received were documented and included in the final version of the MTP, which is available for review and download on the MPO's website.

With regard to the Transportation Performance Measures (TPMs) required by the FAST Act, the IMPO elected to support INDOT's performance measures in the MTP. The IMPO also developed region specific targets, such as percentage of people within the metropolitan area who have access to a connected sidewalk, integrating regional planning priorities and practices with national required measures and targets. Information regarding the statewide targets supported by the IMPO is published on the MPO website: <https://www.indympo.org/maps-resources/data-studies/federal-performance-measures>. There is a truncated system performance report included in the current MTP which documents baseline data and the most recently available data for the federally required performance measures. However, the report does not clearly indicate how the goals and projects included in the MTP contribute to or support INDOT's performance targets for the required measures. INDOT and all the Indiana MPOs have developed a standardized system report format that should be used by the MPOs and included in any updated MTPs or updates to the INDOT Long-Range Statewide Transportation Plan (LRSTP).

4.2.3 Findings: The FHWA/FTA Review Team finds the IMPO MTP meets the requirements of 23 U.S.C. 134(c), (h) & (i), 23 CFR 450.324, and 23 CFR 450.306(d).

Recommendation: The FRT recommends INDOT coordinate with the IMPO in the development of future MTP funding projections, in accordance with 23 CFR 450.324. It is also recommended that these projections include at a minimum, statewide maintained revenues that could reasonably be used to improve the IMPO/INDOT transportation system.

Recommendation: The FRT recommends that the IMPO include a clear breakdown of projected revenues and estimated expenses to demonstrate fiscal constraint.

Recommendation: In the next update to the MTP, the IMPO should include a system performance report detailing the progress achieved in meeting the performance targets in comparison with the baseline data as outlined in 23 CFR 450.324 (f) (3) and (4)).



4.3 Transit Asset Management Plan (TAM)

4.3.1 Regulatory Basis

Section 20019 of MAP-21 amended Federal transit law by adding a new section 5326 to Chapter 53 of title 49 of the United States Code. The provisions of 49 U.S.C. § 5326 require the Secretary of Transportation to establish and implement a National TAM System which (1) defines the term state of good repair, (2) requires that all Chapter 53 recipients and subrecipients develop a TAM plan, (3) establishes annual reporting requirements, and (4) includes technical assistance. 49 U.S.C. § 5326(b).

4.3.2 Current Status

The Indianapolis, IN urbanized area transit services are provided by two transit operators: Indianapolis Public Transportation Corporation (IPTC), more commonly known as IndyGo, and Central Indiana Regional Transportation Authority (CIRTA). IndyGo is the largest public bus transit operator in the Indiana region. IndyGo provides transit service for thousands of Indianapolis passengers that populate more than 368-square mile service area. IndyGo transports about 725,000 riders monthly, along 31 routes. CIRTA is a regional governmental organization that connects Indianapolis transit with suburban and rural communities in Marion, Hamilton, Hancock, Shelby, Johnson, Morgan, Hendricks, Boone, Delaware, and Madison counties. As a recipient of FTA Section 5307 and Section 5311 funds, CIRTA provides three services: Workforce Connect, Commuter Connect, and County Connect.

IndyGo adopted their FY2018-2022 IndyGo Transit Asset Management Plan (TAM) in 2018 and is developing 2022 TAM update to be adopted October 2022. IndyGo established a TAM Committee that meets quarterly to assesses existing asset management programs, identify best practices, and set targets to comply with the FTA TAM Final Rule. For the 2022 TAM update, IndyGo has two goals, implement Tier 1 IndyGo TAM Plan and Group TAM Plan to include their FTA Section 5310 subrecipients. Previously, FTA Section 5310 subrecipients were part of INDOT's Group TAM Plan. CIRTA does not have a TAM Plan.

4.3.3 Findings: The FHWA/FTA Review Team finds that the IMPO TAM meets the requirements of 49 U.S.C. § 5326.

Commendation: The IMPO is commended for providing leadership, support, and technical assistance to their partners while completing their 2018 TAM plan to meet the MAP-21 requirements.

4.4 Coordinated Public Transit Human Services Transportation Plans/Enhanced Mobility of Seniors and Individuals with Disabilities Program Management Plan

4.4.1 Regulatory Basis

49 U.S. Code 5310 requires that projects selected for funding under the Enhanced Mobility for Individuals and Individuals (Section 5310) Program be "included in a locally developed, coordinated public transit-human services transportation plan," and that the plan be "developed and approved



through a process that included participation by seniors, individuals with disabilities, representatives of public, private, and nonprofit transportation and human services providers and other members of the public" utilizing transportation services. These coordinated plans identify the transportation needs of individuals with disabilities, older adults, and people with low incomes, provide strategies for meeting these needs, and prioritize transportation services for funding and implementation.

4.4.2 Current Status

Coordinated Public Transit Human Services Transportation Plan:

In December 2015, the Fixing America's Surface Transportation (FAST) Act applied new program rules to all FTA funds. One of the changes required Coordinated Public Transit Human Services Transportation Plans must be updated to reflect the changes established by the FAST Act Federal legislation. IMPO Coordinated Plan was updated in 2017 to meet this requirement. The Coordinated Plan was developed in cooperation with Indiana Department of Transportation, Office of Transit (INDOT), IndyGo, local agencies that provide transportation for the public, older adults, and individuals with disabilities. Regional stakeholders and local partners saw redundancy in IMPO's 2017 Coordinated Plan and encouraged the MPO to reduce their goals and strategies in the next plan update. IMPO listened and their Transportation Policy Committee adopted the Coordinated Public Human Services Transportation Plan on October 20, 2021.

IMPO Coordinated Public Transit Human Services Transportation Plan (Coordinated Plan) covers Boone, Hamilton, Hancock, Hendricks, Johnson, Marion, Morgan, and Shelby Counties. For the development of the 2021 Coordinated Plan, IMPO and IndyGo discussed their collaborative process. IndyGo, designated by the Governor, is responsible for the administration of FTA Enhanced Mobility of Seniors and Individuals with Disabilities Program (Section 5310) within Indianapolis Urbanized area. INDOT, is the direct recipient and administers FTA Section 5310 Program for Indianapolis Rural area. Both IndyGo and INDOT solicit applications and select eligible Section 5310 projects through a competitive process that is explained in the Indianapolis Urbanized Program Management Plan (PMP).

Program Management Plan (PMP):

The Indianapolis Urbanized 2015 Program Management Plan application process is conducted, developed, and distributed by IndyGo for the Enhanced Mobility of Seniors and Individuals with Disabilities Program (Section 5310). IndyGo announces and conducts an annual Call of Projects in the first quarter of the calendar year. IPTC staff and Marion County Transportation Advisory Committee (MCTAC) evaluates all applications. Once complete, IndyGo announces the awarded projects and submits a written notification of the selection results to all applicants. After approval, selected transit projects are sent to INDOT to be included in their current Statewide Transportation Improvement Plan and IMPO's Transportation Improvement Plan. IndyGo has begun revising the PMP and plans to approve the updated PMP by December 2022.

4.4.3 Findings: The FHWA/FTA Review Team finds that the IMPO Coordinated Public Transit Human Services Transportation Plan and Program Management Plan meet the requirements of 49 U.S.C. § 5310.

Commendation: The IMPO is commended for their leadership and collaborative efforts with INDYGO and INDOT in the development of the Coordinated Public Transit Human Services Transportation Plan.



4.5 Transportation Improvement Program (TIP) and Annual Listing of Obligated Projects (ALOP)

4.5.1 Regulatory Basis

23 U.S.C. 134(c),(h) & (j) set forth requirements for the MPO to cooperatively develop a Transportation Improvement Program (TIP). Under 23 CFR 450.326, the TIP must meet the following requirements:

- Must cover at least a four-year horizon and be updated at least every four years.
- Surface transportation projects funded under Title 23 U.S.C. or Title 49 U.S.C., except as noted in the regulations, are required to be included in the TIP.
- List project description, cost, funding source, and identification of the agency responsible for carrying out each project.
- Projects need to be consistent with the adopted MTP.
- Must be fiscally constrained.
- The MPO must provide all interested parties with a reasonable opportunity to comment on the proposed TIP.

23 U.S.C. 134(j)(7) and 23 CFR 450.334 requires that the State, the MPO, and public transportation operators cooperatively develop a listing of projects for which Federal funds under 23 U.S.C. or 49 U.S.C. Chapter 53 have been obligated in the previous year. The listing must include all federally funded projects authorized or revised to increase obligations in the preceding program year and, at a minimum, the following for each project:

- The amount of funds requested in the TIP
- Federal funding obligated during the preceding year
- Federal funding remaining and available for subsequent years
- Sufficient description to identify the project
- Identification of the agencies responsible for carrying out the project

4.5.2 Current Status

The FY 2022-2025 TIP was incorporated in the approval of the INDOT FY 2022-2026 STIP on June 17, 2022. Interagency consultation was conducted in accordance with the Indiana Interagency Consultation Group (ICG) Conformity State Implementation Plan (SIP) and in accordance with the MPO's Planning Agreement. The last conformity determination was made by FHWA/FTA on July 7, 2022.

The IMPO FY2022-2025 TIP documents how Federal, State, and local funds will be expended on highway and public transportation improvements and contains all federally funded and regionally significant projects. The TIP includes State and local roadway, bridge, bicycle, pedestrian, safety and transit projects. The IMPO coordinated the fiscally constrained, multi-modal TIP through a comprehensive,



continuing and cooperative effort with FHWA, FTA, INDOT, LPAs, public transit operators, the public, and other interested parties. The FHWA/FTA Federal Review Team noted that the TIP project list is entirely online and may not be accessible to some populations and/or stakeholders.

The IMPO used their project selection/scoring criteria to guide the development of the current adopted TIP. IMPO's project selection process evaluates numerous factors including corridor connectivity, existing level of service (related to congestion), and proximity to the identified freight network, which also aligns with the goals and priorities outlined in the most recent MTP update (Central Indiana 2050). A more robust discussion of the project selection process the IMPO uses can be found using the following link: https://d16db69sqbolil.cloudfront.net/mpo-website/downloads/TIP/IMPO-Selection-Criteria-Policy_May2018_v2.pdf. The FHWA/FTA Federal Review Team found that the MTP and the CMP appear to funnel projects into the TIP's development.

In accordance with regulatory requirements for performance measures and management, the IMPO has coordinated with the respective DOTs and transit agencies, and has documented the required performance measures (i.e., safety, bridge and pavement condition, travel time reliability, air quality, and transit asset management) in the FY2022-2025 TIP, as well as the 2050 MTP. In addition, the MPO has specifically outlined the anticipated effect of the projects included in the TIP toward achieving the performance targets identified in the MTP, linking investment priorities to those performance targets.

In accordance with the procedures outlined in the Participation Plan, and in alignment with local directives, IMPO used various tools (including the IMPO's website (<https://www.indympo.org/>), newspaper advertisements, an open public meeting, and public hearings at the Technical Committee, and Policy Board meetings) to solicit and collect feedback from members of the public and stakeholders. Comments received were reviewed and documented by IMPO staff and made available as an Appendix to the FY2022-2025 TIP. However, the public hearing for the TIP was held during a regularly scheduled MPO committee meeting, which typically takes place during the "workday" hours for public stakeholders.

The IMPO's most recent ALOP has been developed in accordance with the requirements outlined above. However, there are some instances, specifically with regard to DOT and transit projects, where the minimum required descriptive information is not provided. During the site meeting it was noted that project description information provided by INDOT is inconsistent and could be improved. The DOT and transit providers should coordinate with the IMPO to ensure that the necessary project description information is reflected in future TIPs and ALOPs.

4.5.3 Findings: The FHWA/FTA Review Team finds that the IMPO TIP and ALOP substantially meet the requirements of 23 U.S.C. 134(c), (h) & (j), 23 CFR 450.326, and 23 CFR 450.334.

Recommendation: The FHWA/FTA Team recommends the IMPO revise public meetings for the TIP to ensure that those public meetings are held at convenient and accessible locations and times as required in 23 CFR 450.316 (1) (v).

Recommendation: The IMPO should ensure the public participation plan outlines a method for making the TIP accessible to audiences that may not have web access, and/or may have other circumstances or disabilities that prohibit or limit their access to the online format.



Recommendation: INDOT, IMPO, and the respective transit operators should coordinate to ensure the minimum project descriptive information for DOT initiated projects and transit projects is available and published in the TIP and ALOP as defined in the regulations referenced above.

4.6 Public Participation

4.6.1 Regulatory Basis

Sections 134(i)(5), 134(j)(1)(B) of Title 23 and Section 5303(i)(5) and 5303(j)(1)(B) of Title 49, require a Metropolitan Planning Organization (MPO) to provide adequate opportunity for the public to participate in and comment on the products and planning processes of the MPO. The requirements for public involvement are detailed in 23 CFR 450.316(a) and (b), which require the MPO to develop and use a documented participation plan that includes explicit procedures and strategies to include the public and other interested parties in the transportation planning process.

Specific requirements include giving adequate and timely notice of opportunities to participate in or comment on transportation issues and processes, employing visualization techniques to describe metropolitan transportation plans and TIPs, making public information readily available in electronically accessible formats and means such as the world wide web, holding public meetings at convenient and accessible locations and times, demonstrating explicit consideration and response to public input, and a periodically reviewing of the effectiveness of the participation plan.

4.6.2 Current Status

Indianapolis MPO promotes and seeks public involvement early and continuous throughout the transportation planning process. The MPO uses social media and web visualization tools to engage the public regarding transportation projects, products, and processes. IMPO employed social media platforms, stakeholder meetings, and public surveys to gather public input.

The MPO has a documented Participation Plan (PP), most recently updated in April 2021, that includes goals and explicit procedures and strategies to include the public and other interested parties in the transportation planning process. Prior to adoption, notices announcing the update and soliciting comment were printed in the local papers, press releases were sent to media, and information was sent to the Policy Board, Technical Committees, INDOT and





federal agencies. In addition, IMPO incorporates Title VI and Environmental Justice within their planning activities and public involvement procedures. IMPO has also developed a Facebook page and other social media tools to encourage public input and awareness on MPO activities.

A recommendation was provided in the 2018 certification review that the IMPO incorporate previously identified strategies to engage environmental justice (EJ) and underserved communities into the IMPO public involvement procedures. Since the 2018 review, IMPO updated their PP, and included discussion regarding outreach endeavors. This includes utilizing demographic and location criteria to promoted posts to ensure that opportunities are promoted to populations who are traditionally underserved, ensuring subscribers of newsletter include organizations representing the interests of: Older Adults, Minority populations, Transportation agency employees, Users of various modes of transportations, Persons with disabilities, Economically disadvantaged persons, Others underserved by the transportation system, and also making printed copies available upon request.

A recommendation was also provided in the 2018 regarding access for limited English proficiency (LEP) populations. It was recommended that the IMPO perform an analysis to determine the appropriate “mix” of LEP services. The most recently adopted PP includes a four-factor analysis conducted at a county level to determine if there are particular areas where providing language assistance is important, even if the LEP population in the entire MPA is limited. There are several activities listed that show how IMPO has accommodated LEP people in the recent past, and also a list of activities to improve access to IMPO programs, projects, and services, for LEP persons. In addition, IMPO developed a Spanish language webpage on the Indianapolis MPO webpage at www.indympo.org that includes critical documents like the Title VI policy and complaint form, the Public Involvement Plan (PIP), a summary of the Long-Range Transportation Plan (LRTP), and the IMPO Frequently Asked Questions (FAQ) book.

There was some discussion during the site meeting regarding best practices for conducting public meetings outside normal business hours. Currently, IMPO’s formal public meetings are held in the morning and often as part of policy committee meetings. There is potential for additional engagement if meetings are conducted in formats or using methods that allow for involvement at varying times of day.

4.6.3 Findings: The FHWA/FTA Review Team finds that the IMPO Participation Plan meets the regulatory requirements found in 23 CFR 450.316.

Recommendation: The FHWA/FTA Team recommends IMPO consider allowing a virtual option for public meetings, including policy committee meetings. This allows additional participation and involvement.

4.7 Environmental Mitigation

4.7.1 Regulatory Basis

23 U.S.C. 134(i)(2)(D)23 CFR 450.324(f)(10) requires environmental mitigation be set forth in connection with the MTP. The MTP is required to include a discussion of types of potential environmental mitigation activities for the transportation improvements and potential areas to carry out these activities, including activities that may have the greatest potential to restore and maintain the environmental functions affected by the plan. The discussion may focus on policies, programs, or strategies or it may address project level impacts. The goal of including an environmental mitigation discussion is to assure the decision-makers have an understanding of the activities with the greatest potential to restore, improve,



and/or maintain the function of the environment. Efforts to meet the environmental mitigation requirements include consultation with appropriate state and local environmental resource agencies and stakeholders.

4.7.2 Current Status

The MTP states that red flag investigations should be completed for LPA projects to better understand the known resources in the project area and how those may impact project timing and costs. This same information and an explanation of how to use the GIS mapping to complete an RFI is presented on the MPO's website. However, the documents do not contain a discussion of potential mitigation activities or areas where those may be carried out. There is also no discussion in the MTP regarding how environmental factors (e.g., farmland, wetlands, stream impacts, endangered species, historic sites, etc.) contribute to the selection and programming of projects in the long-range plan. The MTP does not contain a list of environmental resource agencies and/or how they were consulted during the development of the plan. There is no indication that environmental resources are considered during the transportation planning process. The MTP does not discuss how the federal exchange program, which goes into effect in 2025, will impact the evaluation of transportation project impacts on environmental resources.

During the review, the MPO discussed coordination with the state and federal agencies regarding air quality conformity determinations; however, the MPO was not able to confirm regular engagement with the state and local environmental resource agencies during the transportation planning process. If requested, FHWA and FTA will coordinate with the Resource Center to identify and provide additional resources for the MPO to aid in meeting this requirement.

4.7.3 Findings: The FHWA/FTA Review Team finds that the MPO environmental mitigation does not meet the requirements of 23 U.S.C. 134(i)(2)(D)23 and CFR 450.324(f)(10).

Corrective Action: The review team finds the MPO has not demonstrated consultation with environmental resource agencies in the transportation planning process and does not meet the requirements outlined in 23 CFR 450.324(f)(10).

4.8 Air Quality

4.8.1 Regulatory Basis

The air quality provisions of the Clean Air Act (42 U.S.C. 7401) and the MPO provisions of Titles 23 and 49 require a planning process that integrates air quality and metropolitan transportation planning, such that transportation investments support clean air goals. Under 23 CFR 450.324(m), a conformity determination must be made on any updated or amended transportation plan in accordance with the Clean Air Act and the EPA transportation conformity regulations of 40 CFR Part 93. A conformity determination must also be made on any updated or amended TIP, per 23 CFR 450.326(a).



4.8.2 Current Status

The MPO has the most recent air quality procedures published on their website to inform the public on how consultation occurs in development and maintenance of the TIP and MTP documents. In addition, the MPO publishes conformity reports associated with TIP and MTP amendments.

The IMPO is currently listed as attainment for all the transportation criteria pollutants. With regard to Carbon Monoxide, Marion County became an Attainment area in March 2020. However, all nine counties in the IMPO airshed are still subject to conformity requirements for the 1997 8-hour ozone standards due to the South Coast II judicial ruling. Those areas are referred to as “orphan areas” rather than non-attainment or maintenance areas.

Interagency consultation is conducted in accordance with the Indiana Interagency Consultation Group (ICG) Conformity State Implementation Plan (SIP) and in accordance with the established Interagency Consultation procedures. The IMPO also has an agreement with the Anderson MPO (MCCOG) to ensure there is coordination in the air quality conformity consultation process for projects in Madison County. The INDOT, MPOs, and FHWA are working to update the consultation procedures, and the IMPO has been an integral contributor in the update development process.

Congestion Mitigation and Air Quality (CMAQ) funds are sub-allocated in Indiana and the IMPO follows FHWA’s 2013 Interim Program Guidance for determining project eligibility.

4.8.3 Findings: The FHWA/FTA Review Team finds that the IMPO is in compliance with federal regulations.

4.9 Congestion Management Process / Management and Operations

4.9.1 Regulatory Basis

23 U.S.C. 134(k)(3) and 23 CFR 450.322 set forth requirements for the congestion management process (CMP) in TMAs. The CMP is a systematic approach for managing congestion through a process that provides for the safe and effective integrated management and operation of the multimodal transportation system. TMAs designated as non-attainment for ozone must also provide an analysis of the need for additional capacity for a proposed improvement over travel demand reduction, and operational management strategies.

23 CFR 450.324(f)(5) requires the MTP include Management and Operations (M&O) of the transportation network as an integrated, multimodal approach to optimize the performance of the existing transportation infrastructure. Effective M&O strategies include measurable regional operations goals and objectives and specific performance measures to optimize system performance.

4.9.2 Current Status

CMP: Since the last certification review, IMPO has expanded its CMP and included it in the 2050 MTP in Appendix G. In addition, the MPO has developed several initiatives and policies that will advance the CMP priorities in the MPO area. During the development of the most recent MTP update, the MPO



added several regional performance measures that align with the CMP, including the average travel time between regional activity centers, job accessibility for transit users, percentage of people within the metropolitan area who have access to a connected bikeway, and percentage of people with access to fixed route transit.

ITS: The IMPO has a regional ITS architecture that was adopted in 2014 and serves as a roadmap for transportation systems integration. However, the MPO is planning to coordinate with INDOT and stakeholders to update their ITS Architecture in 2022-23 in accordance with the latest version of the national ITS framework Architecture Reference for Cooperative and Intelligent Transportation (ARC-IT).

4.9.3 Findings: The IMPO meets the requirements related to management and operations, and ITS.

Recommendation: It is suggested IMPO review the security of the information technology systems (ITS) and consider discussing vehicle connectivity and automation into the region's ITS Architecture Plan.



5.0 CONCLUSION AND RECOMMENDATIONS

The FHWA and FTA review found that the metropolitan transportation planning process conducted in the Indianapolis urbanized area meets, with corrective action, the Federal planning requirements as follows.

5.1 Commendations

The following are noteworthy practices that the Indianapolis MPO is doing well in the transportation planning process:

1. The FRT commends the IMPO on the development of clear procedures and resources for use by local public agencies in requesting funds and implementing projects for federally exchanged funds issued by IMPO.
2. The IMPO is commended for providing leadership, support, and technical assistance to their partners while completing their 2018 TAM plan to meet the MAP-21 requirements.
3. The IMPO is commended for their leadership and collaborative efforts with INDYGO and INDOT in the development of the Coordinated Public Transit Human Services Transportation Plan.

5.2 Corrective Actions

The following are corrective actions that the Indianapolis MPO must take to comply with Federal Regulations:

1. The review team finds the IMPO has not demonstrated consultation with environmental resource agencies in the transportation planning process and does not meet the requirements outlined in 23 CFR 450.324(f)(10).

5.3 Recommendations

The following are recommendations that would improve the transportation planning process:

1. The FRT recommends that the MPO coordinate with INDOT to develop strategies and/or methods to streamline future updates to planning agreement(s).
2. The FHWA/FTA Review Team recommends INDOT coordinate with the IMPO in the development of future MTP funding projections, in accordance with 23 CFR 450.324. It is also recommended that these projections include at a minimum, statewide maintained revenues that could reasonably be used to improve the IMPO/INDOT transportation system.
3. The FRT recommends that the IMPO include a clear breakdown of projected revenues and estimated expenses to demonstrate fiscal constraint.



4. In the next update to the MTP, the IMPO should include a system performance report detailing the progress achieved in meeting the performance targets in comparison with the baseline data as outlined in 23 CFR 450.324 (f) (3) and (4)).
5. The FHWA/FTA Team recommends the IMPO revise public meetings for the TIP to ensure that those public meetings are held at convenient and accessible locations and times as required in 23 CFR 450.316 (1) (v).
6. The IMPO should ensure the public participation plan outlines a method for making the TIP accessible to audiences that may not have web access, and/or may have other circumstances or disabilities that prohibit or limit their access to the online format.
7. INDOT, IMPO, and the respective transit operators should coordinate to ensure the minimum project descriptive information for DOT initiated projects and transit projects is available and published in the TIP and ALOP as defined in the regulations referenced above.
8. The FHWA/FTA Team recommends IMPO consider allowing a virtual option for public meetings, including policy committee meetings. This allows additional participation and involvement.
9. It is suggested IMPO review the security of the information technology systems (ITS) and consider discussing vehicle connectivity and automation into the region's ITS Architecture Plan.

5.4 Training/Technical Assistance

The following training and technical assistance is recommended to assist the MPO with improvements to the transportation planning process:

1. FHWA Indiana division is working with the Headquarters Office of Planning to develop and execute a Public Involvement training session focused on improving public involvement efforts and practices, including outreach to underserved populations.



APPENDIX A – PARTICIPANTS AND AGENDA

Federal reviewers prepared this Certification Review report to document the results of the review process. The report and final actions are the responsibility of the FHWA Indiana and the FTA Region V office. The following individuals were involved in the IMPO virtual site review:

The Federal Review Team included:

Michelle Allen, FHWA Indiana Division
Kari Carmany-George, FHWA Indiana Division
Steven Minor, FHWA Indiana Division
Karen Stippich, FHWA Indiana Division (not at on-site review)
Erica Tait, FHWA Indiana Division
Cecilia C. Godfrey, FTA Region V

IMPO Staff:

Steve Cunningham, Principal Planner III
Annie Dixon, Senior Planner I
Jennifer Dunn, Senior Planner I
Anna Gremling, Executive Director
Jen Higginbotham, Principal Planner II
Cole Jackson, Financial Analyst I
Catherine Kostyn, Data Modeler II
Andrew Magee, Senior Planner I
Andrea Miller, Senior Planner I

Sean Northup, Deputy Director
Kristyn Sanchez, Senior Financial Analyst I
Rose Scovel, Principal Planner I
Andrew Swenson, Principal Planner II

Transit Operators:

Jennifer Gebhard, CIRTA
Mohammad Khan, CIRTA
Brooke Thomas, IndyGo
Ryan Wilhite, IndyGo

INDOT:

Brandon Burgoa, INDOT Technical Planning
Jennifer Bennett, INDOT
Jay Mitchell, INDOT Technical Planning
Roy Nunally, INDOT Technical Planning
Alison Shaner, INDOT Technical Planning

FHWA and FTA would like to express our appreciation to the IMPO staff for the advance preparation for the virtual site review and for distributing the public comment form and information about the public meeting portion of the review. Also, the review team appreciates the above individuals for their contributions to the review. We would also like to thank the staff from the INDOT's Central Office for their participation. And finally, we'd like to thank the transit operators for attending and participating.



AGENDA

INDIANAPOLIS METROPOLITAN PLANNING ORGANIZATION

FEDERAL TMA CERTIFICATION REVIEW

JUNE 7TH AND 8TH 2022: AGENDA

Indianapolis Metropolitan Planning Organization – Indianapolis TMA

Tuesday, June 7, 2022 - 9:00 a.m. – 3:00 p.m. (EST)

[Zoom Link](#)

Please join 10 minutes prior to the start of the first discussion (8:50am EST)

| DISCUSSION PART 1 | | | |
|----------------------------|---|--------------------------------------|--|
| 9:00am - 10:30am (EST) | <ul style="list-style-type: none"> • Welcome and Scope of Review • Introductions • MPO Overview <ul style="list-style-type: none"> ○ Organizational Structure ○ Bylaws; Agreements with IMPO/INDOT/Transit Providers ○ Financial Planning/Exchange Agreement ○ Consultation and Coordination ○ Status of recommendations from the previous certification | Erica Tait Michelle Allen IMPO | Zoom Link Telephone Only: 1-669-254-5252 Meeting ID 160 070 9639 Password 583754 |
| DISCUSSION PART 2 | | | |
| 10:45am – 11:45am (EST) | <ul style="list-style-type: none"> • Metropolitan Transportation Plan <ul style="list-style-type: none"> ○ Plan Development and Maintenance ○ Conformity ○ Amendments ○ Project Prioritization; Performance Based Planning/Programming ○ Financial Planning ○ Public Involvement ○ Land Use Committee and Scenario Planning | Steven Minor Erica Tait | Zoom Link Telephone Only: 1-669-254-5252 Meeting ID 160 070 9639 Password 583754 |
| LUNCH BREAK 11:45AM-1:15PM | | | |
| DISCUSSION PART 3 | | | |
| 1:15pm – 2:15pm (EST) | <ul style="list-style-type: none"> • Transportation Improvement Program/Annual Listing of Obligated Projects <ul style="list-style-type: none"> ○ Plan Development and Maintenance ○ Project Prioritization and how it relates to MTP and PBPP | Erica Tait | Zoom Link Telephone Only: 1-669-254-5252 Meeting ID |



INDIANAPOLIS METROPOLITAN PLANNING ORGANIZATION

FEDERAL TMA CERTIFICATION REVIEW

JUNE 7TH AND 8TH 2022: AGENDA

| | | | |
|-----------------------------------|---|----------------------------------|--|
| | <ul style="list-style-type: none"> ○ Conformity ○ Amendments/Modifications ○ Public involvement ○ Financial Planning ○ Annual Listing of Obligated Projects (ALOP) | | 160 070 9639 Password 583754 |
| DISCUSSION PART 4 | | | |
| 2:30pm-3:00pm (EST) | <ul style="list-style-type: none"> ● Indiana PL Distribution Formula | IMPO | Zoom Link Telephone Only: 1-669-254-5252 Meeting ID 160 070 9639 Password 583754 |
| PUBLIC LISTENING SESSION I | | | |
| 6:00pm – 7:00pm (EST) | <ul style="list-style-type: none"> ● Virtual Public Listening Session | Erica Tait Cecilia C. Godfrey | Zoom Link Telephone Only: 1-669-254-5252 Meeting ID 160 762 0963 Password 077186 |



INDIANAPOLIS METROPOLITAN PLANNING ORGANIZATION

FEDERAL TMA CERTIFICATION REVIEW

JUNE 7TH AND 8TH 2022: AGENDA

Indianapolis Metropolitan Planning Organization – Indianapolis TMA

Wednesday, June 8, 2022 - 9:00 a.m. – 12:30 p.m. (EST)

[Zoom Link](#)

Please join 10 minutes prior to the start of the first discussion (8:50am EST)

| DISCUSSION PART 5 | | | |
|-------------------------------|--|---------------------------------|--|
| 9:00am – 10:30am (EST) | <ul style="list-style-type: none"> • Transit Planning/Coordination <ul style="list-style-type: none"> ○ FTA Grant Administration/Coordination ○ Transit Asset Management Plan ○ Coordinated Human Services Transportation Plan ○ FTA Civil Rights ○ Suburban Transit Planning ○ COA/Onboard Survey ○ Purple Line ○ Transit Oriented Development ○ Mobility Management/Personal Mobility Network | Cecilia C. Godfrey | Zoom Link Telephone Only: 1-669-254-5252 Meeting ID 161 788 6279 Password 179794 |
| DISCUSSION PART 6 | | | |
| 10:30am – 11:15am (EST) | <ul style="list-style-type: none"> • Public Participation & Civil Rights <ul style="list-style-type: none"> ○ Participation Process Highlights ○ Social Media, Videos, Townhalls, Listening Sessions, Advertising ○ Dashboards ○ Title VI & Environmental Justice/Limited English Proficiency | Michelle Allen | Zoom Link Telephone Only: 1-669-254-5252 Meeting ID 161 788 6279 Password 179794 |
| DISCUSSION PART 7 | | | |
| 11:30am – 12:30pm (EST) | <ul style="list-style-type: none"> • Environmental Mitigation and Resiliency Planning <ul style="list-style-type: none"> ○ Reg Flag Analysis ○ ACCC/Bloomberg ○ Thrive Plan • Other | Kari Carmany-George IMPO | Zoom Link Telephone Only: 1-669-254-5252 Meeting ID 161 788 6279 |



INDIANAPOLIS METROPOLITAN PLANNING ORGANIZATION
FEDERAL TMA CERTIFICATION REVIEW
JUNE 7TH AND 8TH 2022: AGENDA

| | | | |
|------------------------------------|---------------------------------------|----------------------------------|--|
| | ○ Coordination on the ReThink/Chamber | | Password 179794 |
| PUBLIC LISTENING SESSION II | | | |
| 2:30pm – 3:30pm (EST) | • Virtual Public Listening Session | Erica Tait Cecilia C. Godfrey | Zoom Link Telephone Only: 1-669-254-5252 Meeting ID 160 108 3135 Password 390520 |



APPENDIX B - STATUS OF FINDINGS FROM LAST REVIEW

One of the priorities of each certification review is assessing how well the planning partners in the area have addressed corrective actions and recommendations from the previous certification review. This section identifies recommendations from the previous certification and summarizes discussions of how they have been addressed.

Recommendation 1: The IMPO has expressed deep concerns over how the FHWA Planning (PL) funds are distributed and makes the Indianapolis MPO the sole “donor region”. FHWA and FTA recommends that the INDOT and the IMPO work together to determine how this may be resolved.

Disposition: This recommendation is unresolved.

Recommendation 2: During the site visit, IMPO provided documentation as evidence of their EJ outreach endeavors. However, the strategies used to engage the EJ communities are not specifically documented in the IMPO’s public involvement policies. The Review Team recommends that the IMPO incorporate these strategies into the IMPO public involvement procedures.

Disposition: This recommendation has been resolved.

Recommendation 3: The USDOT guidance entitled, “Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons (LEP)”, outlines four factors recipients should apply to the various kinds of contacts they have with the public to assess language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons. It is recommended that the IMPO perform an analysis to determine the appropriate “mix” of LEP services. The correct mix should be based on what is both necessary and reasonable in light of the four-factor analysis.

Disposition: This recommendation has been resolved.



APPENDIX C – PUBLIC COMMENTS

Public Comment Forms & Public Listening Sessions

In making the certification determination, 23 USC 134 (k)(5)(D) and 49 USC 5303 (k)(5)(D) requires FHWA and FTA to provide for public involvement appropriate to the metropolitan area. As part of the Certification Review, there were two opportunities for the public to provide comments on the IMPO planning process. Announcement of the Certification Review and the Public Meetings were advertised in advance of the meeting on the MPO website, in local print media and through use of social media. The announcement was also emailed to recipients of the IMPO newsletter. The meetings were held on June 7, 2022, from 6:00 pm to 7:00 pm (EST) and on June 8, 2022, from 2:30 pm- 3:30 pm (EST) . The meetings were held virtually via Zoom. The links to the meeting were provided in the meeting announcements and were posted on the IMPO website, Indiana Department of Transportation Crawfordsville and Greenfield District websites, and social media sites, including Facebook. A public presentation with slides was visible for those who accessed the meeting on Zoom. Participants could ask questions via the chat pod or directly using the audio options on Zoom. Poll questions were also used during the presentation in order to encourage interaction and feedback from the attendees. The charts below contain the poll questions and results.

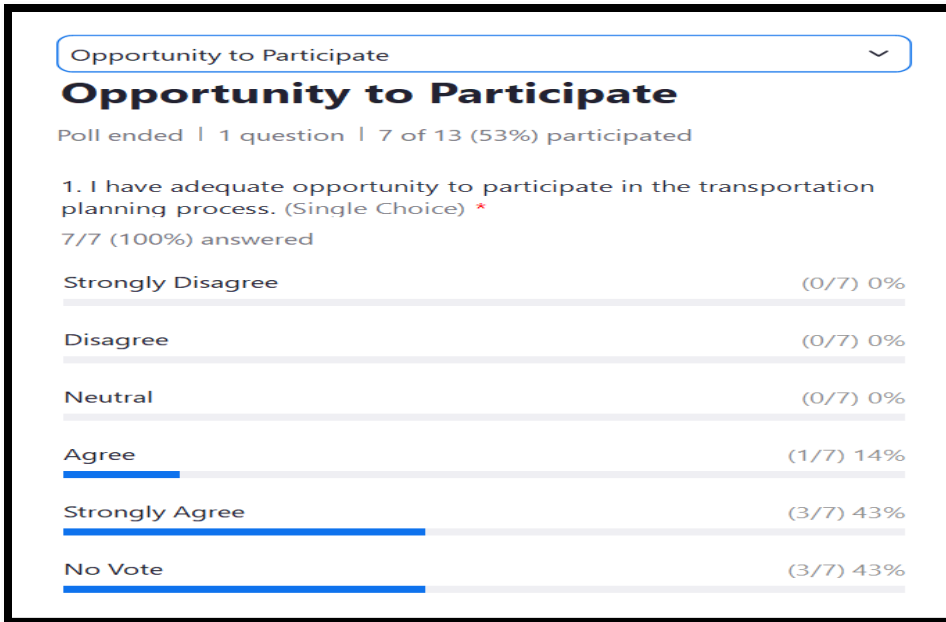
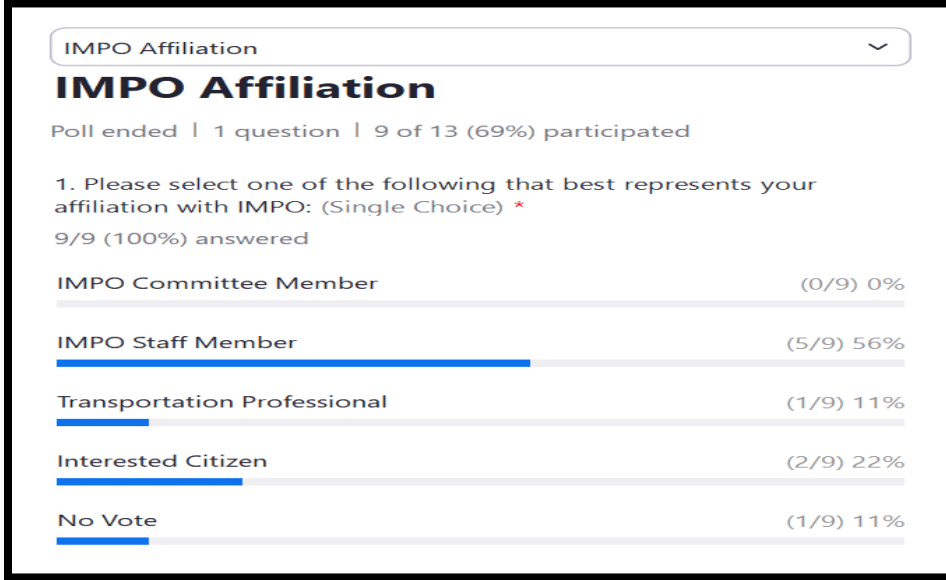
The members of the public that participated in the virtual public comment sessions are listed below. The Federal Review Team did not receive any direct comments. In order to enhance the opportunity for public input, the Federal Review Team, MPO, and INDOT published a comment form made available to the public from May 20th- June 21st, 2022. The following pages summarize the comments provided.

Public Participants:

Nicholas Badman
Todd Barker
Paula Brooks
Brenda Freije
Taylor Firestein
Taylor Hughes
Tim Maloney
Jennifer Milliken
Charlie Richardson
Connie Szabo Schmucker



Poll Questions June 7, 2022





Understanding of IMPO Process

Understanding of IMPO Process

Poll ended | 1 question | 7 of 13 (53%) participated

1. The information presented has increased my understanding of IMPO's planning process and how I can get involved. (Single Choice) *

7/7 (100%) answered





Poll Questions June 8, 2022

MPO Affiliation

0:38 | 1 question | 13 of 16 (81%) participated

1. Please select one of the following that best represents your affiliation with IMPO: (Single Choice) *

13/13 (100%) answered

| | |
|-----------------------------|------------|
| IMPO Committee Member | (2/13) 15% |
| IMPO Staff Member | (4/13) 31% |
| Transportation Professional | (4/13) 31% |
| Interested Citizen | (3/13) 23% |
| No Vote | (0/13) 0% |

Opportunity to Participate

0:36 | 1 question | 13 of 16 (81%) participated

1. I have adequate opportunity to participate in the transportation planning process. (Single Choice) *

13/13 (100%) answered

| | |
|-------------------|------------|
| Strongly Disagree | (0/13) 0% |
| Disagree | (0/13) 0% |
| Neutral | (1/13) 8% |
| Agree | (5/13) 38% |
| Strongly Agree | (4/13) 31% |
| No Vote | (3/13) 23% |

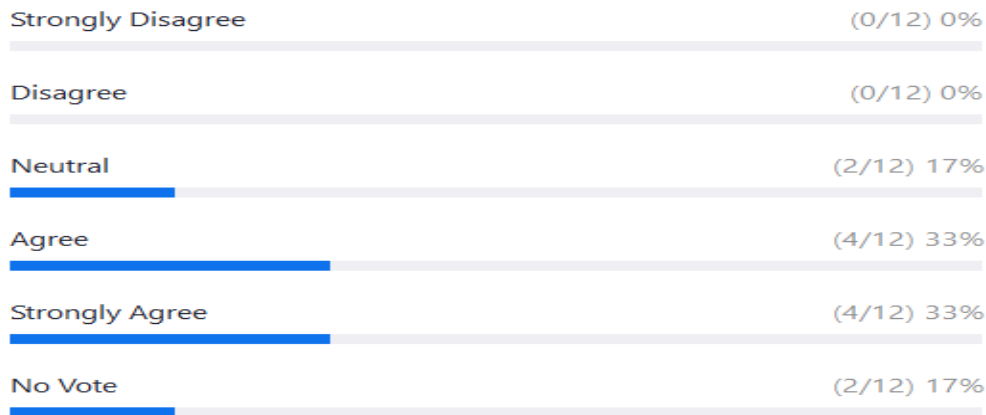


Understanding of Planning Process

0:43 | 1 question | 12 of 16 (75%) participated

1. The information presented has increased my understanding of IMPO's planning process and how I can get involved. (Single Choice) *

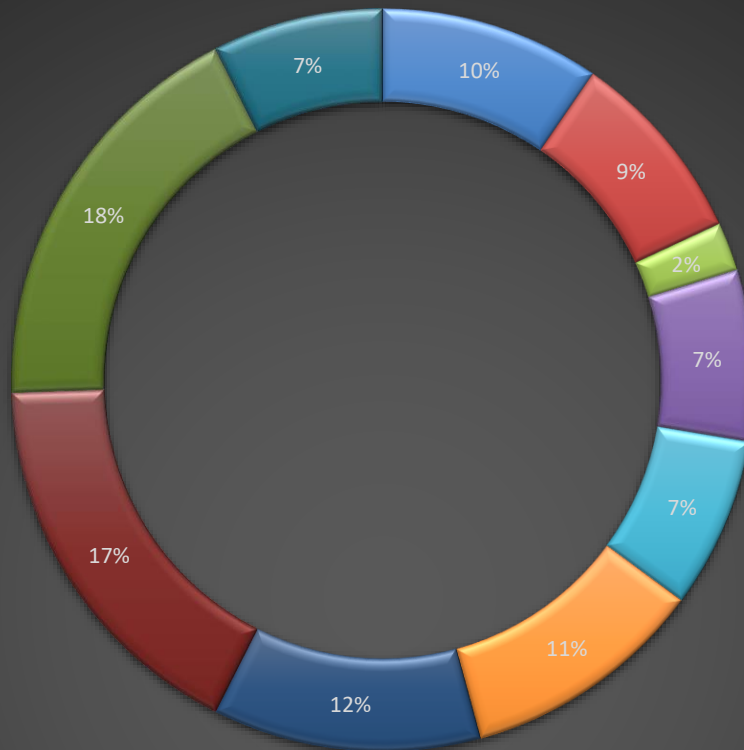
12/12 (100%) answered





Public Comment Form Responses

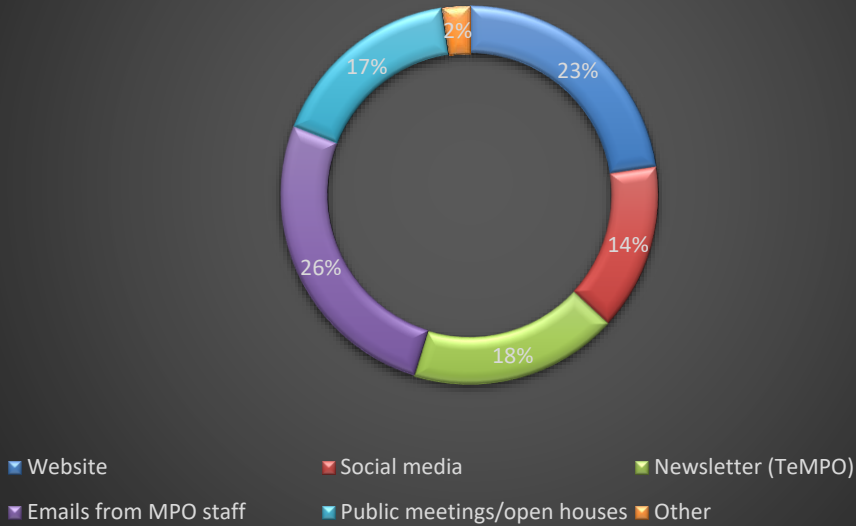
How have you been involved with the IMPO?



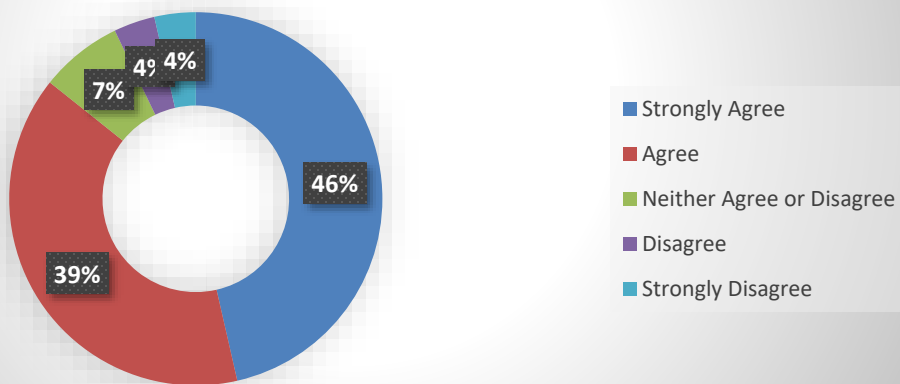
- Member of the Transportation Technical Committee
- Member of the Transportation Policy Committee
- Member of the Executive Committee
- Member of a committee for an IMPO project or plan (i.e. complete streets committee)
- Member of a governmental partner organization
- Member of an advocacy group
- Attended Policy/Technical Committee meeting
- Attended public information meeting
- Interacted with the IMPO online (website, social media, etc.)
- Have not previously interacted with the IMPO
- Other



Where do you find information about the IMPO and its activities?

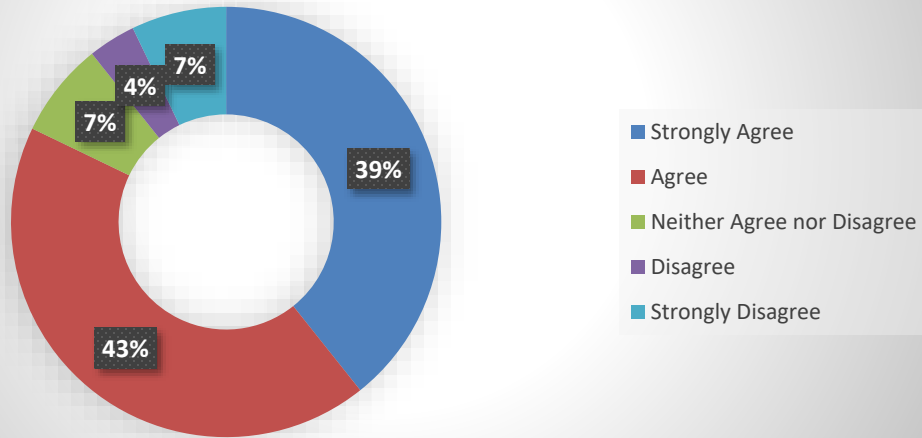


The IMPO provides adequate opportunity to participate in the transportation planning process.

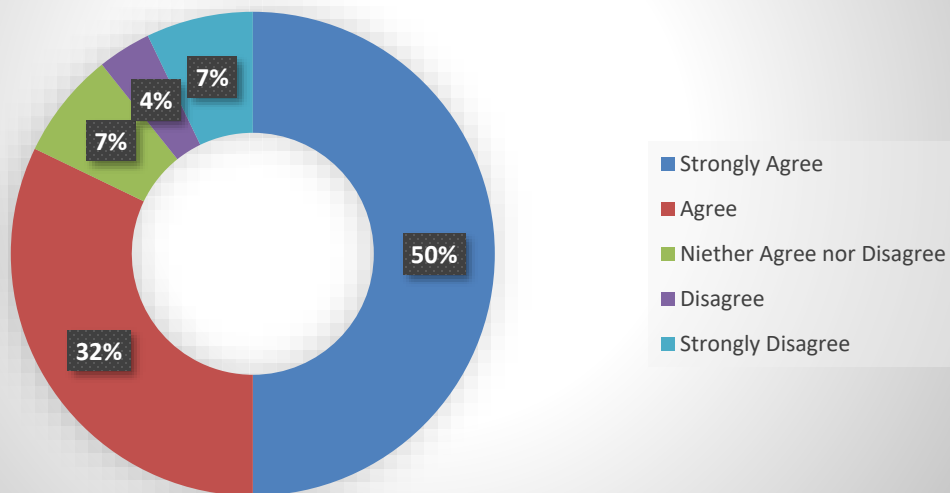




IMPO documents and plans are easily accessible.

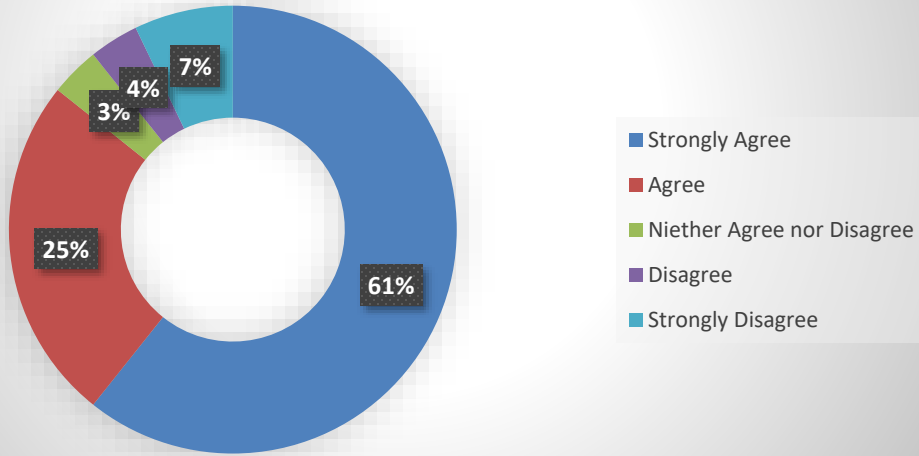


All transportation modes and users are included in the IMPO planning process and plans.

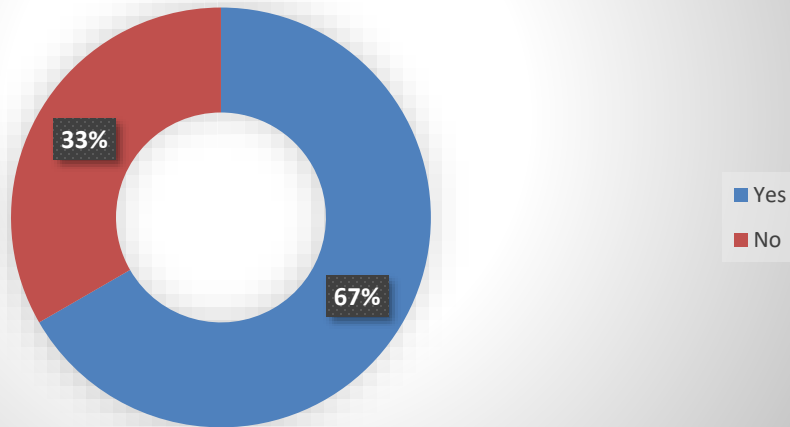




All people have equal opportunity to be involved in the IMPO's transportation planning process.



Did you know you can file a complaint if you have experienced discrimination in the IMPO's transportation planning process?





APPENDIX D - LIST OF ACRONYMS

ADA: Americans with Disabilities Act
AMPO: Association of Metropolitan Planning Organizations
CAA: Clean Air Act
CFR: Code of Federal Regulations
CMP: Congestion Management Process
CO: Carbon Monoxide
DOT: Department of Transportation
EJ: Environmental Justice
FAST: Fixing America's Surface Transportation Act
FHWA: Federal Highway Administration
FTA: Federal Transit Administration
FY: Fiscal Year
HSIP: Highway Safety Improvement Program
IJA: Infrastructure Investment and Jobs Act
ITS: Intelligent Transportation Systems
LEP: Limited-English-Proficiency
M&O: Management and Operations
MAP-21: Moving Ahead for Progress in the 21st Century
MPA: Metropolitan Planning Area
MPO: Metropolitan Planning Organization
MTP: Metropolitan Transportation Plan
NAAQS: National Ambient Air Quality Standards
NO₂: Nitrogen Dioxide
O₃: Ozone
PM₁₀ and PM_{2.5}: Particulate Matter
SHSP: Strategic Highway Safety Plan
STIP: State Transportation Improvement Program
TDM: Travel Demand Management
TIP: Transportation Improvement Program
TMA: Transportation Management Area
U.S.C.: United States Code
UPWP: Unified Planning Work Program
USDOT: United States Department of Transportation

APPENDIX E – BILLING REVIEW

Regulatory Basis

FHWA is required to annually evaluate internal controls for itself and recipients of federal-aid highway funding as part of the Financial Integrity Review & Evaluation (FIRE) program per FHWA Order 45601.C.

Current Status

The billing review was conducted separately from the virtual on-site review. Payroll for the selected job elements was reviewed and found to be accurate. All documentation was found to be accurate and complete.

The focus of the review was a sample of the MPO billing from the first quarter of 2022 (January 1 – March 31, 2022) and a copy of the Unified Planning Work Program (UPWP) that showed how IMPO calculated their direct and indirect rates. Kristyn Sanchez, Senior Financial Analyst, provided the requested documents which supplied details of how their Fringe and Indirect rates were calculated for the year.

The normal methodology followed by the FHWA Finance staff for conducting billing reviews involves randomly selecting line items (in this case, job elements). When selecting line items from which to work, the person(s) conducting the review has the latitude to “judgmentally” select a line item if that person, in his/her professional judgment, feels there is something unique about that item they feel warrants further review. In this case, since there was a large invoice totaling \$441,546.04, the billing was sorted and randomly sampled to include details from three work elements: 200 Data Collection/Analysis, 500 Transit/Active Transportation, and 600 Other Planning Initiatives/Special Studies. The documentation provided correctly supported the claim amounts from the random sample for the three elements identified above. All the Direct Labor charges were reviewed using timesheets and other supporting documentation. The fringe and indirect rates were both calculated correctly.

The review was conducted by the FHWA Indiana Division Finance Specialist, Pamela Davis, and the Senior Community Planner, Erica Tait.

Findings

Overall, the billing review showed no improper payments. The IMPO Billing selected and the direct and indirect rates in the Unified Planning Work Program (UPWP) were found to be complete and accurately calculated resulting in a finding of satisfactory internal controls.



Report prepared by:

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