**CDOT Monitoring Report of Subrecipients**

**As Revised - November 30, 2023**

**Region # / Division Name:** Click here to enter text.

**Subrecipient Name:** Click here to enter text.

**Project Name:** Click here to enter text.

**Project Number (Subaccount):** Click here to enter text.

**Total Federal Award Amount:** Click here to enter text.

**Performance Period Start / End Dates:** Click here to enter text.

**Risk Level:** Click here to enter text.

**CDOT Contact for Monitoring:** Click here to enter text.

**CDOT Contact Title:** Click here to enter text.

**Final Report Date:** Click here to enter text.

**For Compliance with 2 CFR 200: §200.327, §200.328, §200.329, §200.331, and §200.332**

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1. **Document Control**

This section contains the details that enable appropriate version control for this document, as well as to provide evidence of approval and distribution to appropriate parties within CDOT. The Division of Project Support, with assistance from the Division of Accounting and Finance (DAF) and the Division of Audit, owns and maintains this document and associated work products.

* 1. **Table 1.1 - Revision History**

| Revision Date | Version | Author | Comments |
| --- | --- | --- | --- |
| April 27, 2016 | 0.1 | Michelle Kahler | Initial Draft |
| May 25, 2016 | 0.2 | Michelle Kahler | Updated Draft |
| June 3, 2016 | 1.0 | Michelle Kahler | Final version 1.0 (printed for Legislative Audit session) |
| June 17, 2016 | 1.4 | Michelle Kahler | Updated version |
| August 23, 2016 | 2.0 | Michelle Kahler | Updated version |
| April 7, 2022 | 3.0 | Cathy Cole | Updated version for other federal agencies |
| November 30, 2023 | 4.0 | Amanda Silk  Ryan Sorensen | Updated content to reflect amendments necessary in response to FY 2022 State Audit Findings. |

* 1. **CDOT Reviews / Approvals**

| Name | Title | Role | Date |
| --- | --- | --- | --- |
| Mike Krochalis | Deputy Finance Officer | Project Sponsor | June 3, 2016  August 23, 2016 |
| Steve Markovetz | Local Agency Area Engineer | Subject Matter Expert | June 3, 2016  August 23, 2016 |
| Cathy Cole | Assistant Area Engineer – Local Agency Program | Subject Matter Expert | June 16, 2016  August 23, 2016 |
| Amanda Silk - CDOT | Director, Center for Accounting | Sponsor | November 30, 2023 |

* 1. **Distribution**

| Group | Date |
| --- | --- |
| DAF | TBD |
| Regions – RTDs, Business Managers, Local Agency Contacts, Project Managers | TBD |
| Chief Engineer | TBD |
| Regions, Chief Engineer, Division of Audit, FHWA | November 30, 2023 |

1. **Purpose and Scope**

In order to be compliant with Section 200 in the Code of Federal Regulations (“2CFR”), CDOT has developed a “Subrecipient Monitoring and Risk Assessment Program” to document processes and procedures to support these federal requirements. This program includes CDOT, as a “pass-through entity” (§200.332), assessing risk of Subrecipients receiving federal funds, with the scope of this funding focused initially on the Federal Highway Administration (FHWA)). In 2022, the program adapted this report to include funding provided by the US Treasury under the American Rescue Plan Act/State & Local Fiscal Recovery Funds as directed by Colorado Senate Bill 2021-260. The program also includes different types of monitoring activities as described in this report that will be performed for a sampling of Subrecipients during each monitoring cycle. Once selected, monitoring activities will take place over the life of the project and their frequency are based on the level of risk assessed for the Subrecipient. This initial Subrecipient Risk Assessment is completed prior to the execution of their subaward (§200.92) (Intergovernmental Agreement (IGA)) but may change over the life of the project based on results of monitoring activities.

The **CDOT Monitoring Report of Subrecipients** was updated in November 2023 along with the Subrecipient Monitoring and Risk Assessment Manual as a result of audit findings in 2022 by the Office of the State Auditor. The CDOT Monitoring of Subrecipients is a companion document to the Subrecipient Monitoring and Risk Assessment Manual.

The purpose of the CDOT Monitoring Report of Subrecipients is to track and document the results of monitoring activities completed during the monitoring cycle(s) for selected Subrecipient projects. The report also includes guidance on methodology, a list of activities to complete with instructions, a placeholder for results of monitoring activities and a section for authorization of any specific conditions needed to be imposed on the Subrecipient to enforce compliance.

Monitoring activities documented in this report occur for each Subrecipient project selected through the life of that project. If multiple projects are selected for a Subrecipient to be monitored, the CDOT Division / Region contact may work with the Subrecipient to coordinate performing monitoring activities efficiently across the multiple projects. *(e.g., agenda for a discussion covers two projects).*

The scope of the CDOT Monitoring Report of Subrecipients for a project selected for monitoring, is in alignment with the risk level identified in the Subrecipient Risk Assessment. Only one report needs to be completed per project even if the project spans over multiple monitoring cycles. During monitoring, the report is updated to log monitoring results, dates of activities, causes and any specific conditions needing to be communicated to the Subrecipient.

The CDOT Monitoring Report of Subrecipients should be updated by the CDOT Division / Region contact and uploaded to ProjectWise for reference, at the following frequency from the time the monitoring begins. This tracking in a central and searchable location is necessary to show CDOT’s compliance with ongoing tracking of all Subrecipient monitoring activities. This upload of the report at various points shows progress to federal agencies of CDOT’s monitoring activities and does not correspond to the timing of Subrecipients submitting their Subrecipient Project Update Report (Formerly the Performance Report(s) to CDOT).

Upload timing to ProjectWise is as follows:

* Immediately upon notification of project selection for monitoring (update title page)
* At the end of the calendar year (if project still active)
* At the end of the fiscal year (if project still active)

Note, DTD does not currently use ProjectWise to store project documentation so an alternative method of storing this report and supporting documentation is being developed.

Refer to the “Subrecipient Monitoring and Risk Assessment Manual” for:

* More information on the overall program
* How to perform appropriate monitoring activities (Section 2)
* File naming and saving conventions for this report (Section 2)

By completing this report, the following information documents compliance by CDOT for the designated Subrecipient federal award, with 2 CFR § 200.331 Subrecipient and Contractor Determinations, and 2 CFR § 200.332 Requirements for pass-through entities. This report confirms that the evaluation of this Subrecipient’s risk of compliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate Subrecipient monitoring, was based upon completion of CDOT’s Subrecipient Risk Assessment and CDOT’s Subrecipient Monitoring and Risk Assessment Manual.

1. **Methodology**

The following monitoring activities will be utilized based on the level of risk identified for the Subrecipient. Different levels of risk (Low, Medium, High) are shown below with a corresponding minimum frequency required to perform the monitoring activity. More explanation on these monitoring activities and a place to track results is included in the list provided in section 5.1.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  |  |  | RISK LEVEL  (Minimum Frequency) | | |
| # | Monitoring Activities | Description of Activity | Low | Medium | High |
| 1 | Invoice Review | Verify that all requested costs have supporting documentation and have been paid for by the Subrecipient. If issues are detected in the randomly selected invoice that are significant, then a site visit may be scheduled to resolve the matter in person. If issues are not adequately resolved, expand invoice review sample to next risk level frequency.  Note, subject to the Region Management team’s discretion and may be performed on a more frequent basis. | (Annually) | (Quarterly) | (Monthly) |
| 2 | Audit Review | *Single Audit:* Review Subrecipient's single audits (as applicable) in areas such as compliance, financial stability, disclosures of related party transactions, etc.  *Period of Performance Date Monitoring:* In addition, CDOT may focus on the area of “End Date Monitoring” to help improve project spending by target FHWA (or other federal awarding agency) end dates.  Note, subject to the Region Management team’s discretion and may be performed on a more frequent basis. | (Annually)  (Weekly) | (Annually)  (Weekly) | (Annually)  (Weekly) |
| 3 | Review of Programmatic, Performance and Financial Reports\* | Review reports submitted by the Subrecipient for programmatic, performance and financial progress and compliance. This will be accounted for in the Subrecipient’s “Subrecipient Project Update Report” (Formerly the Performance Report to CDOT).  *The Subrecipient Project Update Report template is available in the CDOT Local Agency Manual, Additional Resources* [*Website*](https://www.codot.gov/business/localagency/manual/resources)*. CDOT contacts – reference the Subrecipient Monitoring and Risk Assessment Manual for more information.* | (Annually) | (Twice Annually) | (Quarterly) |
| 4 | Technical / Training Assistance Requirement | On question #3 of the “Subrecipient Project Update Report” (Formerly the Performance Report to CDOT), the Subrecipient may indicate if ‘CDOT assistance is required’, allowing the Subrecipient to request additional training from CDOT, as needed. At the discretion of the CDOT Division / Region contact and based on prior results, training may also be needed for activities like: how to properly submit an invoice, following proper procurement procedures, providing required documentation, delivering proof of payment or understanding eligibility instructions. | As Needed | As Needed | As Needed |
| 5 | Other Remedies | At the discretion of the CDOT Division / Region contact, additional monitoring activities may be performed to ensure compliance. (e.g., in-person interviews, site visits) | As Needed | As Needed | As Needed |

\*Note that Invoice Reviews and Project Update Reviews collectively are considered Review of Programmatic, Performance and Financial Reports.

1. **Report Instructions**

This report includes standard language explaining the scope, methodology and instructions for reporting related to Subrecipient monitoring activities. Other sections of the report will need to be updated by the CDOT Division / Region contact, Division of Audit and RTDs/Chief Engineer to complete final reporting and determine action needed.

Report sections should be updated as follows:

* Title Page: CDOT Division / Region contact
* Sections 5.1 – 5.4: CDOT Division / Region contact
* Section 5.5: RTD
* Section 5.6: Division of Audit
* Section 5.7: Chief Engineer
* Appendix – Subrecipient Condition Notification: RTD and CDOT Division / Region contact

This report will be maintained during the life of the project and completed in concurrence with submission of Form 950 for project closure.

Document Management:

* This report will be accessed and saved according to the Document Management guidelines in the “Subrecipient Monitoring and Risk Assessment Manual”.
* Supplemental documentation that is reviewed and supports the monitoring activities needs to be stored in the “2.0 2 CFR 200 Documents”, “Risk\_Management”, or “Signed Agreements” folder in ProjectWise, according to the Document Management guidelines in the “Subrecipient Monitoring and Risk Assessment Manual”.
* Note, for CDOT staff not currently using ProjectWise, an alternative location to store this documentation is being developed.

1. **Subrecipient Monitoring Results**
   1. **Current Practice**

The CDOT Division / Region contact will use the monitoring list below to perform monitoring activities for the selected Subrecipient project. All monitoring activities need to be performed but will be at different frequencies based on the Subrecipient’s risk level (see Section 3). For each activity, update the table below as follows:

* ***Frequency***: Identify the frequency needed for monitoring, based on the risk level for this project and the table referenced in Section 3. Add that in the “Frequency” column.
* ***Yes/No***: Identify if the Subrecipient did what was expected (“Yes”) or not (“No)” and update the “YES/NO” column.
* ***Comments/Dates***: In the “Comments” field, include dates of reviews/interviews/discussions, who from CDOT and the Subrecipient was involved and high-level comments of the activity. Provide more detail on causes, resolution and recommendations in the “Summary” section of the report.

Note, once a project is selected, these are the minimum standard monitoring activities to take place during the project’s lifecycle. For activities needing to be escalated, reference the “Subrecipient Conditions Notification” template in the Appendix, as well as section 5.4.3.

See the “Subrecipient Monitoring and Risk Assessment Manual” for more information on the monitoring activities listed below.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **#** | **INVOICE REVIEW** | **Freq-uency** | **YES / NO** | **COMMENTS / DATES** |
| **1** | Invoice review results during the current monitoring cycle for the Subrecipient are obtained from the appropriate HQ / Region Business Office Manager performing the review. |  |  |  |
| **2** | Invoice results needing corrective action are confirmed to have been provided to the Subrecipient. |  |  |  |
| **#** | **AUDIT REVIEW** | **Freq-uency** | **YES / NO** | **COMMENTS / DATES** |
| **3** | *Period of Performance Date Monitoring:* The weekly “Project End Date Tracking Report” from OFMB is reviewed to see if the project’s FHWA (or other federal awarding agency) “End Date” is listed as expired or approaching expiration.  If the project is listed, confirm the Project Manager and the appropriate HQ / Region Business Office Manager is aware and taking action to make sure either:   1. An “End Date” extension is requested with appropriate rationale. 2. A reimbursement request is submitted to CDOT. | Weekly |  |  |
| **4** | *Period of Performance Date Monitoring:*  For contracts executed after July 1, 2016, there is a project end date on the IGA that matches an end date in SAP (CDOT system) and FMIS (FHWA system). This is currently only for agreements using the “Federal Dollars Local Does the Work” IGA template.  For agreements using the “Fed ARPA $ LA Wk” template, there is a project end date on the IGA that matches an end date in SAP (CDOT system). | Annual |  |  |
| **5** | *Single Audit:* If the Subrecipient is subject to the Single Audit (previously A-133) requirements, results are reviewed by CDOT Division of Audit staff and any findings included in this report. | Annual |  |  |
| **6** | Per the Local Agency Manual and for projects adhering to this manual, it is confirmed that routine and random project reviews have been conducted to make sure the project is being administered in accordance with the terms of the Contract and the approved project specific agreement between CDOT and the Local Agency.  Add to the “Comments / Dates” section if FHWA *(or other federal agency)* participated in one or more of these project reviews or conducted their own separate review(s). |  |  |  |
| **#** | **Review of Programmatic, Performance and Financial Reports** | **Freq-uency** | **YES / NO** | **COMMENTS / DATES** |
| **7** | A “Project Update Report” based on the template located toward the bottom of the following website: https://www.codot.gov/business/localagency/manual/resources, is submitted with each header field and section completed and at the frequency required by the risk level. (see Section 3.1).  Per 2 CFR 200.329(c)(1): *Annual reports must be due 90 calendar days after the reporting period; quarterly or semiannual reports must be due 30 calendar days after the reporting period. The final performance report will be due 90 calendar days after the period of performance end date.* |  |  |  |
| **8** | Per 2 CFR 200.329(c)(2), each Performance Report to CDOT is completed with a level of quality to understand the following:   1. A comparison of actual accomplishments to the objectives of the Federal award established for the period. Where the accomplishments of the Federal award can be quantified, a computation of the cost (for example, related to units of accomplishment) may be required if that information will be useful. Where performance trend data and analysis would be informative to the Federal awarding agency program, the Federal awarding agency should include this as a performance reporting requirement. 2. The reasons why established goals were not met (if appropriate). 3. Additional pertinent information including, when appropriate, analysis and explanation of cost overruns or high unit costs.   *(Per OSC guidance)* Corrective action that is planned or taken based on performance (if appropriate). Note, include relative results from prior reporting. |  |  |  |
| **9** | Per 2 CFR 200.328(e), documentation is available that CDOT was notified of events occurring outside of Performance Report to CDOT deadlines that significantly impacted the project, including:   1. Problems, delays, or adverse conditions which will materially impair the ability to meet the objective of the Federal award. Include a statement of the action taken, or contemplated, and any assistance needed to resolve the situation. 2. Favorable developments which enable meeting time schedules and objectives sooner or at less cost than anticipated or producing more or different beneficial results than originally planned. |  |  |  |
| **10** | Per 2 CFR 200.329(d), for construction projects only, onsite technical inspections and verifiable, estimated percentage of completion data have been reviewed. |  |  |  |
| **#** | **Technical / Training Assistance Requirement** | **Freq-uency** | **YES / NO** | **COMMENTS / DATES** |
| **11** | If either the Subrecipient requested, or CDOT notified the Subrecipient that training / technical assistance is needed, it has been scheduled and delivered at a frequency that is appropriate and aligns with the Subrecipient’s risk level. |  |  |  |
| **12** | Document in the “Comments / Dates” any training / technical sessions provided to the Subrecipient supporting their compliance with 2 CFR requirements:   1. Training Type / Activity: 2. # of Attendees: |  |  |  |
| **#** | **Other Remedies**  *CDOT Division / Region contact to add as appropriate. This may include additional reviews, in-person interviews, onsite visits, etc.*  *Mention here if/when the Subrecipient Risk Assessment was updated in accordance with the Subrecipient Monitoring and Risk Assessment Manual.* | **Freq-uency** | **YES / NO** | **COMMENTS / DATES** |
|  |  |  |  |  |
|  |  |  |  |  |

* 1. **Findings**

*Review the comments in the above list. Summarize in this section, high level findings that focus on any exceptions and departures from expected results that were observed during monitoring. Enter the key bullets of your summary below.*

* 1. **Summary Metrics**

*Identify data points associated with what was reviewed that will provide context to comments and findings above. (e.g., 2 out of 8 invoices had the wrong invoice number; 1 Subrecipient Project Update Report (formerly Performance Report to CDOT) was provided when 4 should have been submitted) Include also the timing of the monitoring efforts during the cycle, the individuals involved, number of interviews, documentation reviewed, etc. Make sure to store any supporting documentation for this monitoring in the project’s file as described in Section 6 of the Subrecipient Monitoring and Risk Assessment folder in ProjectWise.*

* 1. **Summary**
     1. **Causes of Findings**

*Based on your reviews and findings, include your interpretation of why you feel these monitoring results occurred that were not what was expected. Include summaries of submitted Subrecipient Project Update Report (formerly Performance Report to CDOT), as needed.*

* + 1. **Resolution of Findings**

*Based on your results, explain what corrective actions were taken (and when) by the Subrecipient during the life of the project to resolve findings and deficiencies. Identify what is left to complete, if anything.*

* + 1. **Recommended Specific Conditions**

*Include below either: a) a summary statement for the report if no further action is needed, OR b) a summary of the specific condition(s) that have been imposed over the course of the project and/or at the end of the project via this final report. These specific conditions will be referenced in future projects with the Subrecipient (possibly years in the future) to see if corrective actions have been taken or if risk is still impacted.*

*Minor fixes and corrective actions should be occurring throughout the life of the project as a result of ongoing monitoring. However, specific conditions represent severe escalated activities imposed on the Subrecipient in order to comply with federal regulation. At the time of identification and per CDOT executive approval, these conditions are communicated to the Subrecipient per the template “Subrecipient Condition Notice”, located in the Appendix.*

1. Summary if no further action is needed:
2. Specific Conditions:
   1. **RTD Acknowledgement**

*The Regional Transportation Director (RTD) will initially review this report and recommendations provided by the CDOT Division / Region contact to confirm the report results and determine if any specific conditions should be applied to improve performance and compliance with federal regulations.*

**CDOT RTD Name:** Click here to enter text.

**Date:** Click here to enter text.

|  |  |  |
| --- | --- | --- |
| I agree with Recommendations | ☐ | Comments: |
| I agree with Recommendations and additional Action(s) | ☐ | Action(s): |

* 1. **Division of Audit Review**

*After the RTD review, the Division of Audit will review the monitoring activities performed to make sure they are following the requirements of the regulation and the processes described in the Subrecipient Monitoring and Risk Assessment manual. Any additional feedback from other audit findings and recommendations are included in this section.*

**Auditor Full Name:** Click here to enter text.

**Auditor Title:** Click here to enter text.

**Date:** Click here to enter text.

|  |  |  |
| --- | --- | --- |
| I agree with Recommendations | ☐ | Comments: |
| I agree with Recommendations and additional Action(s) | ☐ | Action(s): |

* 1. **Chief Engineer Acknowledgement**

*Once the RTD and Division of Audit reviews are complete, the RTD will discuss the report with the Chief Engineer and confirm report results and any specific conditions they agree to apply to the Subrecipient.*

**CDOT Chief Engineer Name:** Click here to enter text.

**Date:** Click here to enter text.

|  |  |  |
| --- | --- | --- |
| I agree with Recommendations | ☐ | Comments: |
| I agree with Recommendations and additional Action(s) | ☐ | Action(s): |

1. **Appendix**
   1. **Subrecipient Condition Notification #1**

The below letter template is used when a Subrecipient needs to be notified that one or more specific conditions or requirements have been imposed on them, based on monitoring results. Update sections indicated in yellow highlighting and check the appropriate boxes in the “Specific Conditions” section. For each Subrecipient Condition Notification issued, include a soft copy of each in this report in this Appendix section. Work with your RTD in advance of sending this notice to reach agreement and confirm the appropriate language needed. This template is to comply with notification of specific conditions to the Subrecipient per 2 CFR federal regulation (200.208(d)(1)–(5)). Copy this text onto official CDOT letterhead before sending.

**TO: [SUBRECIPIENT CONTACT NAME]**

**[SUBRECIPIENT ENTITY NAME]**

**FROM: [RTD NAME]**

**[CDOT DIVISION / REGION CONTACT]**

**DATE:** **[DATE NOTIFICATION IS SENT]**

**SUBJECT: CDOT Subrecipient Monitoring and Risk Assessment Program – Condition Notification**



**Purpose and Action**

The purpose of this letter is to inform [Subrecipient Entity Name] for project “[Project Name]” and Project Number [Subaccount#] that CDOT, as a pass-through entity, is imposing **specific conditions** related to use of the federal award supporting funding of this effort. These specific conditions are identified below and this memo supports CDOT’s requirement to notify you of them, per 2 CFR federal regulation (§200.208(d)(1)–(5)). Based on future monitoring results and your actions, these conditions may be promptly removed and less monitoring frequency needed. CDOT is documenting this letter in your CDOT Monitoring Report of Subrecipients that is tracked through the life of this project to help ensure compliance with Section 200 in the Code of Federal Regulations (“2 CFR”). If the project has completed, corrective actions to these conditions will be noted in a future Subrecipient Risk Assessment and CDOT Monitoring Report of Subrecipients.

**Specific Conditions**

The table and one or more checked boxes below, indicate the nature of the specific conditions being imposed by CDOT to comply with 2 CFR.

|  |  |
| --- | --- |
| ☐ | Require additional response to CDOT requests that have not been addressed. |
| ☐ | Require increased oversight and/or fiscal reviews. |
| ☐ | Require additional training. |
| ☐ | Remove designated project personnel. Names include: |
| ☐ | Withhold authority to proceed to the next phase until receipt of evidence of acceptable performance within a given period of performance. |
| ☐ | Require update of agreement / contract (e.g., IGA). |
| ☐ | Require termination of agreement / contract (e.g., IGA). |
| ☐ | Require additional, more detailed financial or accounting information. |
| ☐ | Require additional project monitoring. |
| ☐ | Require Subrecipient to obtain technical or management assistance. |
| ☐ | Establish additional prior approvals for specific aspects of the project and administration. *(refer to §200.208 for more context)* |
| ☐ | Other (write in): |

**Why the Condition(s) are Being Imposed**

[Include a brief narrative explaining why these specific requirements and conditions are being selected.]

**Nature of the Action the Subrecipient Needs to Take to Remove the Condition(s) (if applicable)**

[Include a brief narrative explaining how the Subrecipient might address this condition, or note that there needs to be more discussion if it’s possible, or that they will not be able to and why.]

**Time Allowed for Subrecipient to Complete their Action**

[If applicable, include how long the Subrecipient has to complete this action for the condition to be removed.]

**How the Subrecipient May Request Reconsideration of the Imposed Condition(s)**

[Include the process for a Subrecipient to respond to and/or negotiate CDOT imposing the condition(s). Identify a time period they need to respond back by before it is final that conditions are imposed.]

**CDOT High Level Actions to Impose Condition(s)**

Upon finalizing the condition(s), CDOT will perform the following high level actions to make sure these conditions are imposed for the Subrecipient:

[Include a handful of bulleted items showing what steps will be taken to make sure the condition(s) are completed. For example, notify and work with procurement to execute a contract change. Mention that both (if appropriate) the Single Audit from the Office of the State Auditor (OSA), as well as activities in the next monitoring cycle, will reference these conditions as a check to determine if they are complete.