

CAMINO REAL REGIONAL MOBILITY AUTHORITY BOARD RESOLUTION

WHEREAS, the Camino Real Regional Mobility Authority (CRRMA) previously adopted a grant policy titled Policies and Procedures Related to Seeking and Administering Grants, which was subsequently amended (the Policy); and

WHEREAS, the Policy governs the CRRMA's application for and administration of grants and requires certain revisions; and

WHEREAS, the Finance Committee of the CRRMA has recently reviewed and made a recommendation to revise the Policy to incorporate various updates and the CRRMA Board agrees that such recommended revisions are appropriate and should be implemented.

NOW, THEREFORE, BE IT RESOLVED BY THE CAMINO REAL REGIONAL MOBILITY AUTHORITY:

THAT the CRRMA hereby adopts the Grant Policy dated August 2025, in accordance with the recommendation of the CRRMA Finance Committee.

PASSED AND APPROVED THIS 13TH DAY OF AUGUST 2025.

**CAMINO REAL REGIONAL
MOBILITY AUTHORITY**

ATTEST:

Joyce A. Wilson, Chair

Lina Ortega
Board Secretary

APPROVED AS TO CONTENT:

Raymond L. Telles
Executive Director

CAMINO REAL REGIONAL MOBILITY AUTHORITY



GRANT POLICY

CAMINO REAL REGIONAL MOBILITY AUTHORITY

POLICIES & PROCEDURES RELATED TO SEEKING AND ADMINISTERING GRANTS

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I. AGENCY BACKGROUND & POLICY PURPOSE

CRRMA BACKGROUND

The Camino Real Regional Mobility Authority (CRRMA) is a regional mobility authority created and operating pursuant to Chapter 370 of the Texas Transportation Code and 43 Tex. Admin. Code §§26.1 et. seq. and is a body politic and corporate and political subdivision of the State of Texas. Created by act of El Paso City Council in 2007, the CRRMA is governed by a seven-member Board of Directors. The Chairperson is appointed by the Governor of Texas, while the remaining six members are appointed by El Paso City Council. The City of El Paso (“City”), as the CRRMA’s sponsoring agency, has also continued to maintain a strong role with the CRRMA through the provision of various support services to the CRRMA. Of particular importance, the City continues to serve as the Fiscal Agent to the CRRMA.

The CRRMA is authorized by statute to study, evaluate, design, finance, acquire, construct, maintain, repair and operate a “transportation project” – a term which is broadly defined by Chapter 370 of the Texas Transportation Code to include but not be limited to, turnpikes and other roadways, rail facilities, bridges, airports, pedestrian and bike facilities, border crossings and parking facilities. In developing transportation projects, the CRRMA is also permitted to pursue loans, gifts, grants and other contributions from various entities, include local, State and Federal agencies. The CRRMA’s fiscal year begins on September 1.

GRANT POLICY PURPOSE

The CRRMA has implemented various policy documents to govern its operations in an efficient and consistent manner. As a grant recipient of federal funds, the CRRMA is also required to have written policies and procedures related to the administration of federally funded programs awarded after December 26, 2014. This document includes the CRRMA policies and procedures that are applicable to all federal and state grants received and administered by the CRRMA. All CRRMA employees, consultants and contractors that work with federal or state granted funds are required to familiarize themselves with this policy document.

II. GRANT APPLICATION PROCESS

CRRMA staff, consultants and contractors are responsible for identifying funding opportunities available to the agency, including federal and state grants. The Executive Director, in consultation with CRRMA staff and consultants, shall review any such grant opportunities for feasibility as a potential CRRMA funding source. Such review may include financial and legal implications, such as matching funds and reporting requirements.

Upon determination of feasibility, the Executive Director shall present such opportunity to the CRRMA Board of Directors for consideration; provided, however, that in instances that require time sensitive submittals, the Executive Director may submit an application for grant funds without prior Board approval. However, any such application may not commit the CRRMA to such grant

requirements and notice of such application shall be brought to the next Board meeting for consideration and ratification or withdrawal.

The decision to accept a grant and enter into any associated grant agreements shall rest solely with the CRRMA Board of Directors and will require formal action of the Board.

III. FINANCIAL MANAGEMENT OF GRANT AWARDS

As noted previously, the City serves as the Fiscal Agent to the CRRMA. Accordingly, most CRRMA funds are managed by the City on behalf of the CRRMA, including various federal and state grant funds. The CRRMA relies upon the City's accounting procedures, accounting system and the Office of the Comptroller and Office of Management and Budget for the management of its various funds. Personnel from the City serve as signatory on CRRMA bank accounts. Accordingly, the CRRMA complies with City requirements for submittal of requests for payment to CRRMA vendors. The City is a recipient of federal and state funds as well, and maintains a robust Grants Administration Division that is intimately familiar with the applicable requirements of such grantees.

General Ledger Transactions are recorded in PeopleSoft and contain the following elements:

- Date of the general ledger transaction – the date the transactions should be within the posting month and within the posting fiscal year
- Account codes
- Transaction ID – automated, system generated general ledger entries shall be easily distinguishable from manual general ledger entries.
- Credit and Debit amounts – debits should equal credits
- Reason for the general ledger transaction
- Supporting documentation

INTERNAL CONTROLS

As specified in 2CFR 200.303, the CRRMA must:

- Establish and maintain effective internal controls over the Federal award in compliance with Federal statutes, regulations, and terms and conditions of the Federal award
- Comply with Federal statutes, regulations, and terms and conditions of the Federal awards
- Evaluate and monitor compliance with statutes, regulations, and terms and conditions of Federal awards
- Take prompt action when instances of noncompliance are identified including compliance identified in audit findings
- Take reasonable measures to safeguard protected personally identifiable information and other information the Federal awarding agency or pass-through entity designates as sensitive or the CRRMA considers sensitive consistent with applicable Federal, state, local laws regarding privacy and obligations of confidentiality

Period of Performance – In accordance with 2 CFR 200.309, the CRRMA may charge to the Federal award only allowable costs incurred during the period of performance (grant period) and any costs incurred before the Federal awarding agency or pass-through entity made the Federal award that were authorized by the Federal awarding agency or pass-through entity. As such, the Executive Director, as part of the approval of expenditures for allowability shall review the expenditure and ensure that the cost incurred is within the allowed period of performance. All allowable grant expenditures shall be incurred during the grant period. Any expenditures incurred outside the period of performance shall be reclassified to the CRRMA's operating fund or other such funding source available to the CRRMA.

The Executive Director and/or Director of Finance shall monitor expenditures during the grant period to ensure that grant funds are spent in a timely manner to accomplish grant purposes and activities. Unless the Federal awarding agency or pass-through entity authorizes an extension, the CRRMA must liquidate all obligations incurred under the Federal award no later than 120 days after then end date of the period of performance as specified in the terms and conditions of the Federal award.

Cost Principles – All grant expenditures must be allowable under the Federal Cost Principles (2 CFR 200 Subpart E) the grant's terms and conditions, the granting agency's policies, and the CRRMA policies and procedures. The general principles are as follows:

- Be reasonable and necessary
 - A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.
 - Necessary is defined as costs needed to carry out the grant award
- Be allocable to federal awards
 - Is incurred specifically for the federal award
 - Benefits both the federal award and other work of the CRRMA and can be distributed in proportions that may be approximated using reasonable methods
 - Is necessary to the overall operation of the CRRMA's mission
 - All activities which benefit from the CRRMA's indirect cost, including unallowable activities and donated services by the CRRMA or third party, shall receive an appropriate allocation of indirect costs
- Be authorized or not prohibited under State or local laws or regulations
- Conform to any limitation or exclusions set forth in these principles, federal laws, terms and conditions of the federal award, or other governing regulations as to types or amounts of cost items
- Be consistent with policies, regulations, and procedures that apply uniformly to both federal awards and other activities of the governmental unit
- Be accorded consistent treatment. A cost may not be assigned to a federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the federal award as an indirect costs
- Not included as a cost or used to meet cost sharing or matching requirements of any other federal award in either the current or a prior period, except as specifically provided by federal law or regulation

- Be the net of all applicable credits.
- Be adequately documented.

GRANT PAYMENT PROCEDURES – The CRRMA’s General Engineering Consultants (“GEC”) review invoices for compliance and accuracy. A draft invoice is submitted to the El Paso District of the Texas Department of Transportation (TxDOT). TxDOT reviews the invoices and refers any issues to the CRRMA’s Executive Director, who then alerts the GEC of such issue. The GEC makes any necessary adjustments, reviews the invoice for accuracy and appropriateness, and submits the invoice to the CRRMA’s Executive Director. If a GEC is not involved in a project, then the CRRMA will review invoices internally. The Executive Director reviews the invoice and notifies the Director of Finance to issue payment to the vendor. The Director of Finance submits a request to the City for payment to the vendor. The City then follows their standard procedures for processing payments including approvals from the Office of the Comptroller and Office of Management and Budget as necessary. The Executive Director then submits to TxDOT for reimbursement. The Executive Director and Director of Finance monitor the Texas Comptroller’s website for notices of payment from the state. Within one to two days after receiving a notice of payment, the Director of Finance submits a notice to the City (as the CRRMA’s fiscal agent) that a payment has been received in the CRRMA’s City controlled bank account. The Director of Finance advises the City of the funding string where the revenue should be recorded.

Cost Sharing or Matching –As specified in 2 CFR 200.306, the following are basic criteria for funds that are acceptable to serve as a local match:

- Are verifiable from the CRRMA’s records
- Are not included as a contribution for any other Federal award
- Are necessary and reasonable for accomplishment of project or program objectives
- Are allowed under 2 CFR Part 200 part E (Cost Principles)
- Are not paid by the Federal Government under another award, except where the Federal statute authorizing a program specifically provides that Federal funds made available for such program can be applied to matching or cost sharing requirements of other Federal programs

The Director of Finance is responsible for ensuring that any funds used for match follow the criteria listed above and any other requirements of the related grant.

Equipment Management – The CRRMA shall safeguard all property (assets and inventory) purchased with federal grant funds under the same guideline as property purchased with other sources of funds. Additional insurance for property purchased with federal grant funds shall be acquired if specifically required by a federal grant award. The only property owned by the CRRMA, that were purchased by federal grant funds, are bicycles, bike share stations, and bike equipment. These are monitored by the third-party operator that oversees the CRRMA’s bike share program using software provided by the equipment manufacturer. Twice a year the third-party operator completes an inventory of all equipment including kiosks, docks, and bicycles. Each bicycle is also outfitted with a location tracking device that aids the operator in recovery if a bicycle is not properly docked.

Special Tests and Provisions – The CRRMA, through its GEC, reviews and retains payroll for contractors and subcontractors as required on federally funded projects. The reviews entail monthly checks. The CRRMA, operates a Quality Assurance program for projects that includes sampling of materials and conformance to design by qualified personnel. The program has received concurrence from TxDOT. Each construction contract includes requirement that vendors pay prevailing wages.

Buy America – The CRRMA requires contractors to comply with the latest provisions of Buy America as listed at 23 CFR 635.410. Compliance is achieved by requiring a notarized original of TxDOT FORM D-9-USA-1 (Department Form 1818) or equivalent which is included in every CRRMA construction contract as part of a Special Provision to Item 006 “Control of Materials”.

Liquidated Damages (Contractor Recoveries) – The CRRMA, when recovering funds from contractors, will work with TxDOT to ensure that the state receives its proportionate share of such recoveries, if any.

Fraud – The CRRMA shall disclose to the granting agency if any federal grant funds have been subject to fraud by CRRMA staff and/or contractors. Corrective actions, as appropriate, shall be implemented to remedy the loss of grant funds due to fraud.

Remedy for Non-Compliance – The CRRMA may be subject to consequences due to non-compliance with federal regulations. The CRRMA shall strive to maintain compliance, but shall respond appropriately to all notifications of non-compliance from the federal granting agency or pass-through agency.

GRANT CLOSEOUT PROCEDURES – The CRRMA shall submit all grant closeout documents to the granting agency or pass-through agency, as appropriate. Grant closeout procedures shall include but not be limited to the following:

- Ensure that no obligations are made after the grant period end date
- Submit the final grant expenditure report
- Match reimbursements received from the granting agency to expenditures in the City’s general ledger and process a final reimbursement, if necessary, to ensure all costs have been reimbursed by granting agency
- Certify that the final request for reimbursement of federal grant funds are accurate
- Refund any excess grant funds, interest, or other payables to the granting agency or pass through agency
- Account for any real and/or personal property on hand at the end of the grant period

Records Management - CRRMA policy indicates that records related to federal, state, and private grants will be retained for a period of 3 years, unless a longer retention policy is required by the grantor agency. If, however, the CRRMA is a sub grantee in the case of an indirect federal grant, the records must be retained for at least two years after the expiration of the retention period provided. See CRRMA Records Retention Policy for more details, which may be found on the CRRMA’s website (www.crrma.org)

As a political subdivision of the State of Texas, the CRRMA is statutorily required to adopt an Investment Policy. The CRRMA annually adopts the City's most recent Investment Policy, while making minor revisions that are unique to certain CRRMA funds. Therefore, the management of such awards will comply with the CRRMA's and the City's Investment Policy and the City's applicable accounting policies and procedures. While, in most instances, the CRRMA will place federal and state grant funds in the care of the City, there are various CRRMA funds that are not managed by the City but instead are managed by outside trustees (e.g. bond proceeds). Further, in instances in which the granting agency would prefer placement of grant funds outside of the City's control, the CRRMA may do so, in accordance with and pursuant to agreement with such funding agency. In such event, said grant funds will be managed in compliance with the CRRMA's Investment Policy, subject to any additional requirements of the granting party. The most recently adopted CRRMA Investment Policy can be found on the CRRMA's website (www.crrma.org).

The CRRMA was intentionally created as a streamlined organization that would rely on the structure of partner agencies to achieve significant strides in mobility while maintaining a small presence. To this end, the CRRMA's Executive Director and Director of Finance are employees of the City that are tasked with managing and overseeing CRRMA activities. The Executive Director is responsible for managing all day to day operations of the CRRMA, including the financial activities of any grant awards, while utilizing the City as Fiscal Agent. The CRRMA is also required to retain an outside audit firm to complete an annual independent audit that includes a review of its financial activities.

IV. PROCUREMENT OF GOODS AND SERVICES

The CRRMA maintains a policy for its purchasing activities titled "Policies and Procedures Governing the Procurement of Goods and Services". This document, which may be found on the CRRMA's website (www.crrma.org), governs its procurements, but notes that "for projects for which federal or state funding is utilized, the [CRRMA] will comply with all applicable federal regulations." Topics identified within the policy include, but are not limited to, Disadvantaged Business participation, construction/building contracts, professional services and emergency procurements. In addition to the requirements identified within the policy, the CRRMA shall continue to include the TxDOT in procurements which intend to utilize any federal or state funding. While the policy shall serve as the baseline guidance document for the agency, the CRRMA may, from time to time, adopt additional guidance for staff related to procurements. An example of such additional guidance may include the granting of additional authority for the staff to approve change orders up to a specified amount without further Board authority. However, as noted in the policy, any such additional guidance shall also adhere to and comply with any and all applicable state or federal regulations.

PROCUREMENT – The CRRMA receives board approval prior to making any expenditures with federal or state grant awards. The CRRMA, through its GEC, confirms that all vendors/contractors are not debarred. Once a vendor/contractor requests the bid package and plans from the GEC, the GEC verifies that the prime contractor is TxDOT pre-certified. If the requesting vendor/contractor is pre-certified, then the GEC will provide the bid package and plans to the contractor.

APPROVAL OF GRANT EXPENDITURES – The Executive Director and/or Director of Finance review all expenditures in coordination with the GEC to ensure that the intent and purpose of the grant is met. The Executive Director and/or Director of Finance determine that the expenditure is allowable in accordance with the grant agreement and that the expenditure has been properly budgeted and coded in accordance with the City’s accounting structure.

1. GEC/CRRMA receives invoice
2. GEC/CRRMA reviews invoice for prices, unit counts, dates, and contract compliance
3. GEC sends invoice to Executive Director and Director of Finance
4. Executive Director and/or Director of Finance send Request for Payment to appropriate entity (City, Trustee, TxDOT, etc)
5. City staff confirm funding string and dollar amount on payment matches Executive Director and/or Director of Finance’s request before approving for payment

V. RELATED POLICIES AND PROCEDURES

There are various CRRMA policies and procedures that shall be utilized in conjunction with this document, for the efficient and effective operation of the agency, including but not limited to the following instruments:

- Investment Policy
- Procurement of Goods and Services
- Travel and Business Reimbursement Policy
- Record Retention Policy
- Disadvantaged Business Enterprise Program
- Conflict of Interest Policies
 - For Consultants
 - Financial Team Members

Many of these policies or procedures may be found on the CRRMA website (www.crrma.org) or are available upon request of the CRRMA.

[END OF POLICY AND PROCEDURES]