

**Oregon Department of Transportation
Summary of Internal and Federal Audits and Reviews
July 1, 2012 – June 30, 2014**

Internal audits and reviews completed by ODOT Audit Services

Report Title	Date	Source	Summary	ODOT Response
OWIN Follow-up Audit	July 2012	ODOT Audit Services	<p>This audit reviewed the State Radio Project's (Oregon Wireless Interoperability Network [OWIN]) progress addressing issues identified in audit report #10-05. Our follow-up showed that project management has made substantial progress in implementing recommendations from the previous audit.</p> <p>We also identified some areas where additional controls would further improve project accountability. Controls are needed to:</p> <ol style="list-style-type: none"> 1) verify project milestones; 2) improve procedures for issuing and approving Notices to Proceed and equipment installation; 3) appropriately record in-kind transactions in financial systems; and 4) amend agreements to accurately reflect current site occupancy. 	<p>State Radio Project management concurred with the findings and has taken the following steps to address the follow-up recommendations:</p> <ul style="list-style-type: none"> • Revised the Schedule Update Procedure to include verification of project milestones • Implemented a Construction Handoff Package to verify documentation and approvals before beginning construction or equipment installation • Coordinated with Financial Services on the appropriate documentation for in-kind goods and services • Instituted tracking log to work through agreements that do not reflect current site occupancy
FSB - Internal Controls over Financial Reporting (follow-up to Oregon Audits Division (OAD) finding)	Aug 2012	ODOT Audit Services	<p>This was a review of actions Financial Services Branch (FSB) management took in response to a finding in the Secretary of State Audits Division's 2010 Oregon Comprehensive Annual Financial Report. The finding (<i>Internal Controls over Financial Reporting</i>) noted that ODOT needed to improve the accuracy and completeness of data that supports the financial statements.</p> <p>The audit recommended that Financial Services establish recordkeeping procedures to maintain cross-training documentation in an accessible and consistent format.</p>	<p>Management concurred with the findings and recommendation.</p> <p>Financial Services carried out several corrective action steps that included management review and approval procedures, cross-training staff, and protecting spreadsheets from unauthorized or accidental data changes.</p>
Grants Pass Transit Shelters	Dec 2012	ODOT Audit Services	<p>This was a management review of ODOT's processes and procedures involved in the local government project to build bus transit shelters for the City of Grants Pass. We found that ODOT followed established oversight procedures. Costs adhered to federal funding requirements and received the necessary approvals by local, state and federal oversight officials. We did not find that ODOT or other parties involved acted inappropriately.</p>	<p>Management agreed with the report. No additional work was required.</p>
Construction Quality Assurance Follow-up	Jan 2013	ODOT Audit Services	<p>A follow-up to audit report #10-03, which found that ODOT had structured the Construction Quality Assurance Program to provide a reasonable system of checks and balances, but also identified some areas for improving construction oversight. We found all of the recommendations from the 2010 audit had either been implemented or were in the process of being implemented.</p>	<p>Management agreed with the report. No additional work was required.</p>

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Compliance with DAS Delegation	April 2013	ODOT Audit Services	DAS Delegation Agreement 639-11 authorizes ODOT's Procurement Office to procure and administer contracts up to \$5 million. It also requires Audit Services to conduct a compliance review. We found ODOT to be in substantial compliance with the delegation agreement. We did identify some administrative areas for improvement, including updating internal sub-delegations and filing required reports.	Management agreed with recommendations and had taken steps to implement them by the time the management letter was released.
A&E Contract Administration Bridge Engineering Section	April 2013	ODOT Audit Services	This review was part of an agency wide audit of Architectural, Engineering and Related Services (A&E) contract administration at most sections of ODOT. We found some statement of work writing processes appear strong but improvements were needed in closeout, invoice review, and training.	Management concurred with the findings and recommendation. Bridge Section has fully implemented the recommendations of the audit.
Sellwood Bridge Project Controls	May 2013	ODOT Audit Services	This was a review of the project to determine if controls are in place for financial and payment processes; for contract and procurement practices; and if foreseeable risks have been mitigated to an acceptable level to ensure stewardship of Federal funds. Based on our review, adequate controls appear to be in place for the Sellwood Bridge project.	Management agreed with the report. No additional work was required.
A&E Contract Administration Region 1	June 2013	ODOT Audit Services	This review was part of an agency wide audit of A&E contract administration at most sections of ODOT. We found statement of work writing processes appear strong but payment processing practices could be improved. We were not able to test Region 1's contract closeout processes because all contracts in our sample were closed or in the process of being closed by ODOT's Procurement Office (OPO).	Management concurred with the findings and recommendations and has already taken steps to implement recommendations, including refresher training and Procurement Office review of labor rates.
A&E Contract Administration Region 2	June 2013	ODOT Audit Services	This review was part of an agency wide audit of A&E contract administration at most sections of ODOT. We found the processes for statement of work writing in Region 2 appear strong but payment processing could be improved. Because OPO had closed or was in the process of closing each of the contracts in our sample, we were not able to review Region 2's contract closeout procedures.	Management concurred with the findings and recommendation. Implementation is ongoing.
A&E Contract Administration Major Projects Branch	June 2013	ODOT Audit Services	This review was part of an agency wide audit of A&E contract administration at most sections of ODOT. We found that processes for contract closeout and statement of work writing appear reasonable. Payment processing practices have improved over time.	Management agreed with the report. No additional work was required.
A&E Contract Administration Region 3	July 2013	ODOT Audit Services	This review was part of an agency wide audit of A&E contract administration at most sections of ODOT. We found statement of work writing processes appear strong, but payment processing practices could be improved.	Management concurred with the findings and recommendations, and has provided refresher training for all Region 3 staff that is involved in these types of activities/invoices.

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Compliance with DAS Delegation – Additional Observation	July 2013	ODOT Audit Services	OPO lacks a system to track contract actions related to delegated authority. This means that it is unable to determine the extent to which ODOT is using delegations, or to readily generate a report in response to State Procurement Office's request.	Management concurred with the findings and recommendations. System updates were made to enable OPO to track the procurement authority and delegations granted to ODOT.
A&E Contract Administration Human Resources Division & Region 2	Aug 2013	ODOT Audit Services	This review was part of an agency wide audit of A&E contract administration at most sections of ODOT. We found statement of work writing appears strong for both HR and Region 2. However, payment processing for Region 2 could be improved and neither HR nor Region 2 completed documentation and evaluations to close out the contract. The ODOT section responsible for contract closeout and other related contract administration duties was not clearly defined.	Management concurred with findings and recommendations, and has implemented the recommendations.
A&E Contract Administration Region 4	Aug 2013	ODOT Audit Services	This review was part of an agency wide audit of A&E contract administration at most sections of ODOT. We found statement of work writing processes appear strong. We were not able to test Region 4's invoicing or contract closeout processes because all contracts in our sample were administered by OPO.	Region 4 management reviewed the management letter and did not have any comments or concerns. No additional work was required.
A&E Contract Administration Facilities	Sept 2013	ODOT Audit Services	This review was part of an agency wide audit of A&E contract administration at most sections of ODOT. We found areas for improvement in Facilities include statement of work writing, payment processing, and contract closeout.	Management concurred with the findings and recommendations, and has implemented the recommendations.
A&E Contract Administration Rail Division	Sept 2013	ODOT Audit Services	This review was part of an agency wide audit of A&E contract administration at most sections of ODOT. We found statement of work writing appears strong, but payment processing could be improved. In addition, Rail's contract closeout processes did not include all necessary documentation and evaluations.	Management concurred with findings and recommendations, and has improved the effectiveness of payment processing and the documentation of contract closeout.
A&E Contract Administration Transportation Development Division	Sept 2013	ODOT Audit Services	This review was part of an agency wide audit of A&E contract administration at most sections of ODOT. We found statement of work writing appears strong. However, payment processing could be more effective and contract closeout processes did not include all necessary documentation and evaluations.	Management concurred with the findings and recommendations. Implementation in progress.
A&E Contract Administration Technical Services Branch	Oct 2013	ODOT Audit Services	This review was part of an agency wide audit of A&E contract administration at most sections of ODOT. We found statement of work writing appears strong, but payment processing could be improved. In addition, Technical Services' contract closeout processes did not include all necessary documentation and evaluations.	Management concurred with the findings and recommendations. Some recommendations have been implemented and others are in the process of being implemented.

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A&E Contract Administration Region 5	Oct 2013	ODOT Audit Services	This review was part of an agency wide audit of A&E contract administration at most sections of ODOT. We found statement of work writing appears strong, but payment processing could be improved. In addition, Region 5's contract closeout processes did not include all necessary documentation and evaluations.	Management concurred with the findings and recommendations. Some recommendations have been implemented and others are in the process of being implemented.
Contract Change Order Follow-up to 2008 audit	Nov 2013	ODOT Audit Services	A follow-up to an audit from 2008, <i>System to Track and Analyze Change Orders Needs Oversight</i> . We found that the findings from the earlier audit have been addressed. Management has increased the reliability of change order data by revamping the reason code system for change orders. Also, an effective feedback mechanism is in place for the distribution of change order analyses to those responsible for project planning and project management.	Management agreed with the report. No additional work was required.
A&E Contract Administration Office of Maintenance – Maintenance Services	Nov 2013	ODOT Audit Services	This review was part of an agency wide audit of A&E contract administration at most sections of ODOT. We found statement of work writing processes and payment processing practices appear strong. Maintenance's contract closeout processes did not include all necessary documentation and evaluations.	Management concurred with the findings and recommendations. In the process of being implemented.
SPOTS Card Program FY2012	Nov 2013	ODOT Audit Services	This audit was a follow-up to two previous engagements: the fiscal year 2011 SPOTS audit and a management review of SPOTS purchases at District 2B. We found that the findings from these prior reviews have been adequately addressed. We did recommend that the SPOTS coordinator improve documentation of corrective actions taken when the review of declined transactions reveals a cardholder's attempted violation of SPOTS policy.	Management agreed with the recommendation and will implement it into their tracking documentation.
Financial Management of Sno-Park Program	Feb 2014	ODOT Audit Services	This audit reviewed the adequacy of controls around the Winter Recreation Snow Fund, which funds the Sno-Park Program. We concluded that controls are adequate to ensure accuracy of costs allocated to the program and appropriate segregation from the Highway Fund. We noted some costs are not allocated to the program, such as equipment depreciation and equipment purchases, but this is the case any time Highway Maintenance does work for another program or entity. ODOT's plan to explore charging depreciation to its fleet in 2015 means that the Sno-Park Program, and others, would pay for equipment depreciation.	Management concurred with the report. Recommendations are partially completed – ODOT is continuing work with a consultant to evaluate fleet equipment rates.

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Bike & Pedestrian 1% Methodology	May 2014	ODOT Audit Services	<p>This work was carried out in response to a request by ODOT Highway Division Administrator to review the methodology used to calculate the 1% requirement for bicycle and pedestrian facilities and determine if the methodology (1) should include federal funds in the calculation, and (2) be expanded to include additional shoulder work on highway projects.</p> <p>We found the 1% requirement should not include federal funds in the calculation based on existing guidance from the DOJ. Yet, the methodology could be expanded to count shoulder work on highway projects providing bike lanes.</p>	Management concurred with the report. No actions required.
A&E Contract Administration Across ODOT	Feb 2014	ODOT Audit Services	<p>This report is the culmination of our review of A&E contract administration across ODOT. The audit found strong statement of work writing for A&E contracts. However, we also found a lack of clarity in roles and responsibilities for contract administration, issues in payment processing, and inconsistent contract closeouts. We made recommendations to address these issues by improving oversight guidance from OPO and training requirements for contract administrators. We provided individual management letters for each ODOT region and section carrying out A&E contract administration.</p>	Management agreed with the report, and is currently working on implementation.

Reviews completed by the Federal Highway Administration (FHWA)

Report Title	Date	Source	Summary	ODOT Response
Financial Integrity Review and Evaluation (FIRE) Indirect Cost Allocation Plan (ICAP) Motor Carrier Transportation Division ODOT	Oct 2012	FHWA	<p>FHWA reviewed Motor Carrier Transportation Division's proposed indirect cost rates under FHWA's Financial Integrity Review and Evaluation (FIRE) program.</p> <p>Review found that MCTD's FY 2012 and FY 2013 ICAPs and resulting indirect cost rates, as negotiated, are acceptable for allocating indirect costs to Federal awards.</p>	Management concurs with report. No actions required.

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Financial Integrity Review and Evaluation (FIRE) Indirect Cost Allocation Plan (ICAP) Highway Division ODOT	Oct 2012	FHWA	<p>FHWA reviewed Highway Division's proposed indirect cost rates under FHWA's Financial Integrity Review and Evaluation (FIRE) program. Review found that the Highway Division's FY 2013 ICAP and resulting indirect cost rate, as negotiated, are acceptable for allocating indirect costs to Federal awards.</p> <p>For FY 12 and FY 13, the resulting approved rate is 9.5%, and is applicable for the period of July 1, 2012 through June 30, 2014.</p>	Management concurs with report. No actions required.
ODOT Transit Division's (ODOT) Indirect Cost Allocation Plan (ICAP) proposals for fixed final indirect cost rates for Fiscal Year 2013	Nov 2012	FHWA	<p>FHWA reviewed proposals in accordance with the provisions of 2 CFR 225 (formerly OMB Circular 87), "Cost Principles for State, Local, and Indian Tribal Governments." A guiding principle of the circular is that costs billed to Federal awards must be allowable, allocable and reasonable.</p> <p>For FY '13 the resulting approved rate is 4.17% and is applicable for the period of July 1, 2012 through June 30, 2013.</p>	Management concurs with report. No actions required.
ODOT Transit Division's (ODOT) Indirect Cost Allocation Plan (ICAP) proposals for fixed final indirect cost rates for Fiscal Year 2014	Feb 2013	FHWA	<p>FHWA reviewed proposals in accordance with the provisions of 2 CFR 225 (formerly OMB Circular 87), "Cost Principles for State, Local, and Indian Tribal Governments." A guiding principle of the circular is that costs billed to Federal awards must be allowable, allocable and reasonable.</p> <p>For FY ' 14 the resulting approved rate is 7.09% and is applicable for the period of July 1, 2013 through June 30, 2014.</p>	Management concurs with report. No actions required.
Financial Integrity Review and Evaluation (FIRE) Emergency Relief Billing Review Fiscal Year 2012 ODOT	Apr 2013	FHWA	<p>FHWA conducted a billing review of the emergency relief (ER) program in Oregon as part of this year's FHWA Financial Integrity Review and Evaluation (FIRE) Program. This review examined the practices used by the ODOT in documenting and billing ER projects, and focused on the eligibility of expenditures billed to ER projects.</p> <ul style="list-style-type: none"> • ODOT's management of the ER program substantially meets the requirements for funding of Federal ER projects. The work performed and billed is generally allocable and allowable for the projects reviewed. • Some errors found in contract billing and vendor payments, payroll items, and equipment items. 	<p>Management concurs with the report and recommendations. ODOT took the following corrective actions:</p> <ol style="list-style-type: none"> 1) Financial Services sent an advisory to outline the results of the audit and remind all ODOT employees of their responsibilities for proper financial processing and reporting. 2)The Transportation Development Division, Highway Division Budget Office, Financial Services Branch and the Office of Maintenance and Operations working together to conduct an audit of a sampling of Emergency Relief sites/projects in future Emergency Relief eligible events to validate the accuracy of the financial transactions associated with each project.

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Fleet Equipment Rates for Fiscal Year 2013	Apr 2013	FHWA	<p>FHWA reviewed proposals in accordance with the provisions of 2 CFR 225 (formerly OMB Circular 87), "Cost Principles for State, Local, and Indian Tribal Governments." A guiding principle of the circular is that costs billed to Federal awards must be allowable, allocable and reasonable.</p> <p>For FY 2013, the resulting approved rates are applicable for the period of July 1, 2012 through June 30, 2013.</p>	Management concurs with report. No actions required.
ODOT Motor Carrier Transportation Division's Indirect Cost Allocation Plan (ICAP) proposals for fixed final indirect cost rates for Fiscal Year 2014	Apr 2013	FHWA	<p>FHWA reviewed proposals in accordance with the provisions of 2 CFR 225 (formerly OMB Circular 87), "Cost Principles for State, Local, and Indian Tribal Governments." A guiding principle of the circular is that costs billed to Federal awards must be allowable, allocable and reasonable.</p> <p>For FY 14 the resulting approved rates are 33.35% for Audit, 18.66% for Complaint and Econ Regulation, 34.05% for Field Motor Carrier, 14.86% for the Safety Program and 26.73% for Salem Motor Carrier, and are applicable for the period of July 1, 2013 through June 30, 2014.</p>	Management concurs with report. No actions required.
Financial Integrity Review and Evaluation (FIRE) Project Authorization of State Administered Projects-ODOT	May 2013	FHWA	<p>FHWA looked at authorization documents to evaluate the procedures and accuracy of ODOT project authorization and project modification practices. 17 of the 40 projects reviewed to have one or more issues.</p> <p>Also in a 2012 review, FHWA requested ODOT develop written policies and procedures to identify and document all regular duties and responsibilities of the ODOT Program and Funding Services Unit. At the time of this review, these actions had not been completed.</p>	<p>Management concurs with report and has taken the following actions:</p> <ul style="list-style-type: none"> • Created new position descriptions; • Implemented a new directive to identify individual responsibilities for project authorization in FMIS; and • Developed a Project Authorization Checklist to ensure required information has been identified and included in the FMIS authorization.

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Financial Integrity Review and Evaluation (FIRE) Billing Review ODOT	May 2013	FHWA	FHWA conducted a billing review on the eligibility of expenditures billed to Federal-aid projects by ODOT. Review consisted of two quarterly reviews and 2013 Emergency Relief (ER) Billing Review. Some errors were found. Beyond correcting specific errors detected, recommend ODOT perform review of payroll and equipment billing and develop a corrective action plan by September 30, 2013.	Management concurs with the report and recommendations. ODOT took the following corrective actions: 1) Financial Services sent an advisory to outline the results of the audit and remind all ODOT employees of their responsibilities for proper financial processing and reporting. 2) The Transportation Development Division, Highway Division Budget Office, Financial Services Branch, and the Maintenance and Operations Branch are conducting an audit of a sampling of Emergency Relief sites and projects in future ER eligible events to validate the accuracy of financial transactions associated with each project.
Financial Integrity Review and Evaluation (FIRE) Standard Labor Rates for Fiscal Year 2013 ODOT	May 2013	FHWA	FHWA reviewed ODOT's proposed 2013 Standard Labor rates. Review found that ODOT's FY 2013 Standard Labor Rates Agreement and resulting standard labor rates, as negotiated, are acceptable for allocating labor costs to Federal awards. For FY '13, the resulting approved rates are included in the enclosed review report and are applicable for the period of July 1, 2012 through June 30, 2013.	Management concurs with report. No actions required.
2013 National Bridge Inspection Program Review	Feb 2014	FHWA	The FHWA report documents the work performed to determine ODOT's degree of compliance with the National Bridge Inspection Standards (NBIS). ODOT's bridge inspection program is reviewed and assessed for degree of compliance with the NBIS. Overall, Oregon's bridge inspection program is considered to be comprehensive and responsive to the NBIS.	Management concurs with report. No actions required.
Review of ODOT Fleet Equipment Rates Fiscal Year 2014	Feb 2014	FHWA	FHWA reviewed proposals in accordance with the provisions of 2 CFR 225 (formerly OMB Circular 87), "Cost Principles for State, Local, and Indian Tribal Governments." A guiding principle of the circular is that costs billed to Federal awards must be allowable, allocable and reasonable. For FY 14 the resulting rates approved are applicable for the period of July 1, 2013 through June 30, 2014.	Management concurs with report. No actions required.

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Financial Integrity Review and Evaluation (FIRE) Consultant Procurement of Engineering and Design Services	Apr 2014	FHWA	<p>FHWA conducted a 2014 review of ODOT Consultant Procurement of Engineering and Design Services. The review showed ODOT's two-tiered quality based system for procurement of A&E design and service contracts generally complies with 23 U.S.C 112(b)(2) and 23 CFR 172 and applicable FHWA guidance. It was noted that ODOT has implemented seven out of eight of recommendations from the 2009 FHWA FIRE review.</p> <p>FHWA concurred with the recommendations provided in the February 2014 ODOT Audit Services internal audit of A&E contract administration. Recommended ODOT revise its billing rate policy to include specific deadlines by which a consultant must submit its annual audit. If consultants fail to meet required deadlines, recommend ODOT impose specific consequences.</p>	<p>Management concurs with the report and recommendations and has taken the following actions:</p> <ul style="list-style-type: none"> • Drafted revisions to the ODOT Billing Rate Policy to impose consequences for not providing required information. • Set the rate reduction at 10% in its policy and will track the data whenever a consultant's rates have been reduced to gain compliance. • Developed and is delivering training to agency staff responsible for consultant contract payments.
Review of ODOT Fleet Equipment Rates Fiscal Year 2015	July 2014	FHWA	<p>FHWA reviewed proposals in accordance with the provisions of 2 CFR 225 (formerly OMB Circular 87), "Cost Principles for State, Local, and Indian Tribal Governments". A guiding principle of the circular is that costs billed to Federal awards must be allowable, allocable and reasonable.</p> <p>For FY 14 the resulting rates approved are applicable for the period of July 23, 2014 through June 30, 2015.</p>	Management concurs with report.

Audits and reviews completed by the International Registration Plan (IRP) Peer Review Program

Report Title	Date	Source	Summary	ODOT Response
Internal Registration Plan Peer Review Report for Oregon	Sept 2012	IRP	No areas of non-compliance were found.	Management concurs with report. No actions required.

Audits and reviews completed by the Social Security Administration (SSA)

Report Title	Date	Source	Summary	ODOT Response
Social Security Administration Compliance Review Report	June 2014	SSA	SSA conducted a remote review of the technical, procedural, and administrative controls implemented by the Motor Vehicle Administration to comply with the system security requirements included in the Information Exchange Agreement (IEA) between our agencies. to verify that appropriate security safeguards remain in place to protect the confidentiality of information supplied by SSA.	There were no deficiencies, recommendations, or action items resulting from their review.

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Audits and reviews completed by the U.S. Department of Transportation Federal Motor Carrier Safety Administration

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Motor Carrier Safety Assistance Program (MCSAP) Review for the State of Oregon	Dec 2010	FMCSA	<p>This report was released in December 2010, but not finalized until 2013.</p> <p>This Oregon MCSAP Review Report consolidated the findings, recommendations, and noteworthy practices identified during the course of the Regulatory, Financial, and Safety and Program Performance Reviews.</p>	<p>Management concurs with report findings and recommendations.</p> <p>The majority of the audit findings and recommendations have been addressed. The few remaining recommendations require legislative action to correct.</p> <p>However, since ODOT will not be applying for the FFY 2015 federal MCSAP grant, submission of the legislative concept will be deferred until 2016.</p>
FMCSA's Automated Compliance Review System 2014 Annual Program Review (APR)	June 2014	FMCSA	<p>FMCSA created the Automated Compliance Review System web-based system to track state implementation of Commercial Drivers License (CDL) regulations as part of state compliance reviews performed by FMCSA. In the 2014 annual review, FMCSA found that:</p> <ul style="list-style-type: none"> • Oregon does not have the specific law in effect to impose disqualifications per 49 CFR 383.51(c)(9) for prohibiting texting while driving. • Oregon does not comply with requirements for driver medical certification of 'excepted intrastate,' which requires that the CDL applicant choose an 'applicable' medical certification from four possible certifications. 	<p>Management concurs with finding related to imposing disqualifications for prohibiting texting while driving. In response, Oregon included the required offenses to the list of serious traffic violations with law changes made in HB2262, which was passed by the 2013 Oregon Legislative Session.</p> <p>Management contended that the second finding is incorrect. Oregon laws and rules do not provide for a driver certification of 'excepted intrastate,' so it is not an applicable certification in Oregon.</p>