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OFFICE OF THE COMPTROLLER
CITY OF ST. LOUIS



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Comptroller

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November 27, 2006

James W. Suelmann, Director of Streets
Street Department, Traffic Division
1900 Hampton Avenue
St. Louis, MO 63139-2988

RE: Process Review of Traffic and Lighting Division
(Project #2006-27)

Dear Mr. Suelmann:

Enclosed is a report of our process review of the Traffic and Lighting Division's operations for the period July 1, 2004 through April 30, 2006. Our purpose was to understand and evaluate the processes and related controls, and compliance with applicable laws and regulations; and to conduct limited testing of controls in order to provide audit assurance about the process effectiveness and efficiency and make recommendations to improve process performance as well as controls. The objective of this review was to determine if the Traffic and Lighting Division procedures have adequate controls in place to provide reasonable assurance of:

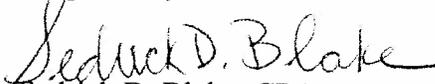
- The accomplishment of established objectives and goals.
- Compliance with applicable laws, regulations, policies and procedures.
- The safeguarding of assets.
- The reliability and integrity of financial information.
- The reliability and integrity of operational information.
- The economic and efficient use of resources.

Our fieldwork was completed on August 8, 2006. Management responses to the observations and recommendations noted in the report were received on October 19, 2006, and have been incorporated in the report.

This review was made under authorization contained in Section 2, Article XV of the Charter, City of St. Louis, as revised, and has been conducted in accordance with the International Standards for the Professional Practice of Internal Auditing.

If you have any questions, please contact me at (314) 589-6132.

Respectfully,


Sedrick D. Blake, CPA
Internal Audit Executive

cc: Stephen J. Runde, Commissioner of Traffic



CITY OF ST. LOUIS

DEPARTMENT OF STREETS

TRAFFIC AND LIGHTING DIVISION

PROCESS REVIEW

JULY 1, 2004 THROUGH APRIL 30, 2006

PROJECT #2006-27

DATE ISSUED: NOVEMBER 27, 2006

*Prepared by:
The Internal Audit Section*



OFFICE OF THE COMPTROLLER

Honorable Darlene Green, Comptroller

CITY OF ST. LOUIS
DEPARTMENT OF STREETS -TRAFFIC AND LIGHTING DIVISION
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EXECUTIVE SUMMARY

Purpose

We have completed a review of the Traffic and Lighting Division. Our purpose was to determine if the Traffic and Lighting Division has adequate controls in place to provide reasonable assurance of:

- The accomplishment of established objectives and goals.
- Compliance with applicable laws, regulations, policies and procedures.
- The reliability and integrity of operational information.
- The economic and efficient use of resources.
- The reliability and integrity of financial information.

Conclusion

In general, the procedures used to carry out the Traffic and Lighting Division's operations appeared to be adequate. The opportunity exists, however, for the Traffic and Lighting Division to make certain improvements in controls over activities. The following are observations resulting from our review:

1. Opportunity to Develop Written Policies and Procedures
2. Opportunity to Develop Written Performance Standards
3. Opportunities to Improve Supervisory Review Documentation
4. Opportunity to Improve Recordkeeping Efficiency by Automation
5. Opportunity to Improve Timeliness of Property Damage Notification
6. Opportunity to Improve Property Damage Billing Efficiency by Automation
7. Opportunity to Improve Controls over Cash Receipts
8. Opportunity to Enhance Documentation of Training and Education
9. Opportunity to Restore Regular Traffic Studies and Volume Counts

Each of these observations is discussed in more detail in the *Detailed Observations, Recommendations and Management's Responses* section of this report.

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Sedrick D. Blake
Sedrick D. Blake, CPA
Internal Audit Executive

12/5/06
Date

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INTRODUCTION

Background

The Traffic and Lighting Division was established as the Division of Traffic and Transportation within the Department of Streets by Section 17.04.010 of the St. Louis City Revised Code. The Traffic and Lighting Division is responsible for designing, and regulating the control of traffic on City streets and thoroughfares, and for maintaining the system of public lighting within the City.

Purpose

The purpose of this review was to determine if the Traffic and Lighting Division operational and fiscal procedures have adequate controls in place to provide reasonable assurance of:

- The accomplishment of established objectives and goals.
- Compliance with applicable laws, regulations, policies and procedures.
- The reliability and integrity of operational information.
- The economic and efficient use of resources.
- The reliability and integrity of financial information.

Scope and Methodology

We confined the review to evaluating controls over operational and fiscal procedures. Our procedures included inquiries of management and staff, observation of relevant processes, and reviews for compliance with policies and procedures, as well as applicable laws and regulations. We performed limited tests of controls, followed up on prior audit observations and other procedures considered necessary. Our fieldwork was completed on August 8, 2006.

Exit Conference

We conducted an exit conference at the Traffic and Lighting Division on September 21, 2006. The Traffic and Lighting Division was represented by Traffic Commissioner Stephen Runde, Deputy Traffic Commissioner Kenneth Cox, and Street Lighting Superintendent Richard Hulse. The Internal Audit Section was represented by Audit Manager Mohammad Adil, Audit Supervisor Ishmael Ikpeama, and Auditor-in-Charge Don Curby.

Management's Responses

We received management responses to the observations and recommendations identified in this report from the Traffic and Lighting Division on October 19, 2006. Those responses have been incorporated into this report.

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OBSERVATIONS

Status of Prior Observations

We noted no unresolved prior observations in our review of the Internal Audit Section's prior reports on the Traffic and Lighting Division.

Summary of Current Observations

In general, the procedures used to carry out the Traffic and Lighting Division's operations appeared to be adequate to provide reasonable assurance of:

- The accomplishment of established objectives and goals.
- Compliance with applicable laws, regulations, policies and procedures.
- The reliability and integrity of operational information.
- The economic and efficient use of resources.
- The reliability and integrity of financial information.

The opportunity exists, however, for the Traffic and Lighting Division to make certain improvements in controls over activities. The following are observations resulting from our review:

1. Opportunity to Develop Written Policies and Procedures
2. Opportunity to Develop Written Performance Standards
3. Opportunities to Improve Supervisory Review Documentation
4. Opportunity to Improve Recordkeeping Efficiency by Automation
5. Opportunity to Improve Timeliness of Property Damage Notification
6. Opportunity to Improve Property Damage Billing Efficiency by Automation
7. Opportunity to Improve Controls over Cash Receipts
8. Opportunity to Enhance Documentation of Training and Education
9. Opportunity to Restore Regular Traffic Studies and Volume Counts

Each of these observations is discussed in more detail in the *Detailed Observations, Recommendations and Management's Responses* section of this report.

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**DETAILED OBSERVATIONS, RECOMMENDATIONS
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1. Opportunity to Develop Written Policies and Procedures

The Traffic and Lighting Division did not have any written policies and procedures in place for its operational and fiscal activities. Due to time constraints, management had not yet developed such written policies and procedures. Written policies and procedures assist in ensuring that procedures and job functions are:

- Effectively communicated to and understood by staff
- Approved by management
- Consistently performed
- In accordance with management goals and objectives

Written policies and procedures also provide a basis for training and cross training of new and current employees and provide a basis for the development of performance standards and measures. In addition, the lack of written policies and procedures increase the risk that control procedures will not be effective or may be over-ridden, employees will not be effectively trained and appropriate performance standards and measures may not be developed.

Recommendation

We recommend the Traffic and Lighting Division management develop and/or maintain written policies and procedures for all significant operational and fiscal functions performed by the division's personnel. The policies and procedures should be:

- Approved by the Appointing Authority and dated.
- Formally communicated to the staff, and the communication documented.
- Reviewed and updated periodically.

Management's Response

The Traffic Division agrees and will begin developing written policies and procedures, especially when it comes to the handling of money. I will begin this procedure by having each staff member from the position of Foreman and above put in writing what he or she feel his or her duties are. This will be reviewed by their supervisors and myself (the Traffic Commissioner) and formally approved with changes we deem necessary. I estimate this should be done by May 1, 2007.

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2. Opportunity to Develop Written Performance Standards

Although the Traffic and Lighting Division had identified a number of performance measures for each of the programs listed on its CityView management reports, the division had not established written performance standards for those performance measures. The division's management indicated performance standards had not yet been established due to time constraints imposed by other responsibilities.

In accordance with sound management practices, an organization or department should establish written performance standards, based on achievement of reasonable levels of relevant performance measures (e.g., response times for requested services or number of significant errors found in reviewed work) for all key functions of its operational and fiscal activities.

Establishing activity performance standards better ensures that the subject functions will be adequately performed to attain management goals and objectives or applicable requirements of other authorities (laws, regulations, contracts, etc.) The absence of established standards increases the risk that acceptable levels of performance will not be uniformly understood by all responsible employees and their supervisors, and subsequently not be regularly attained. Performance standards should be approved by appropriate levels of management and effectively communicated to all applicable staff. The relevant performance measures should be regularly monitored and compared to the standards for management analysis.

Recommendation

We recommend the Traffic and Lighting Division management develop and/or maintain written performance standards for all significant operational and fiscal functions performed by the division's personnel. The performance standards should be:

- Approved by the Appointing Authority and dated.
- Formally communicated to the staff, and the communication documented.
- Reviewed and updated periodically.

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Management's Response

This has been partially done for our laboring force but nothing has been done for supervisory positions. Within the next year, I will have each manager come up with standards of performance for their employees. This should be done by November 1, 2007.

3. **Opportunities to Improve Supervisory Review Documentation**

- A. The Traffic and Lighting Division management indicated an informal target of resolving non-emergency problems within three days of receiving the request. Interviewed management indicated Section Superintendents review dispatcher log sheets to identify unresolved requests. The Traffic and Lighting Division did not maintain any documentation (e.g.: logs, reports, etc.) of Section Superintendents' monitoring of actual versus targeted response periods.
- B. The division's management indicated foremen review work reports prepared by assigned employees after job completion; checking for completeness, reasonableness of time and materials used, and appropriateness of methods used; however, there was no documentation kept of (e.g., foremen's initials on the reports or on a listing of completed jobs) of those reviews.
- C. The division's management indicated foremen daily select and visit sites of jobs assigned to their subordinates to verify work is being properly performed; however, there was no regular documentation kept of the foremen's quality control visits and subsequent results.

Sound business practices suggest supervisory control procedures such as those indicated above should be regularly performed and documented by the responsible individuals for periodic monitoring by appropriate levels of management in order to provide reasonable assurance that the controls are in place and are working.

The absence of documented regular supervisory reviews and quality control visits deprives Division management of evidence that Section Superintendents and foremen are performing important control activities intended to improve assurance that reported problems are addressed and appropriately resolved in a timely manner. As noted in Observation #1 of this report, the Traffic and Lighting Division did not have formally

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established procedures in place for the processes to which the above indicated control activities applied.

Recommendation:

We recommend the Traffic and Lighting Division management ensure that:

A. All managers and supervisors who:

- review records of work assigned to and/or performed by their subordinates and
- compare those records to expected outcomes

document their performance of those reviews and the results obtained.

B. All foremen document their quality control visits and the results.

Written procedures for performing and documenting these reviews should be included in a policy and procedures manual.

Management's Response

I am confident that all our managers review the work of their subordinates; however, as you pointed out, there is very little documentation to that effect. In the future, I will have our managers document on the work orders they check that the work was done, the quality of the work and whether it was done in a timely manner. The managers should be doing this by December 1, 2006.

4. **Opportunity to Improve Recordkeeping Efficiency by Automation**

Recordkeeping for the results of a department's operating activities can be performed more efficiently and be utilized more easily for management's information, if records are computerized and appropriately accessible, rather than if only manual (or single user computer-generated) records are employed. We noted the following opportunities for operational improvements through automation of current activities.

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- A. When requests for corrections of traffic or street lighting problems are received from direct call sources such as police, aldermen, or citizens; as opposed to those that are routed through the Citizen's Service Bureau (CSB); they are recorded on manual log sheets by the division's dispatchers. After a job is completed, the assigned in-charge employee manually prepares, and submits for foreman review, a Maintenance Work Report summarizing what was done and the time and materials used.

There is no automated database or summary system regularly maintained for the complaints received from non-CSB sources. Periodically, the relevant information from the manual log sheets is summarized and combined with the corresponding information from the applicable CSB Complaint System Management Reports and input into the required Excel spreadsheet format for CityView presentation to the Mayor's Office.

- B. For street lighting repairs, after the applicable foreman has reviewed the completed report turned in by the assigned worker, the foreman enters the results into a Microsoft Access database program on the hard drive of a stand-alone microcomputer. Periodically (generally monthly), each foreman prints an activity report and submits it to the Street Lighting Superintendent. The information in the report, however, does not include the date the job was assigned, which would simplify calculation of resolution efficiency data. Also, by having to input job identification data, such as location, the foremen are duplicating the effort made by the dispatchers in the initial log entries.

The Traffic and Lighting Division's recordkeeping for operating activities was more labor intensive than necessary, and therefore not efficient. Also, management did not have ready access to current statistical information about the status of operations to facilitate timely detection and correction of problems. Traffic and Lighting Division management indicated they have not been able to obtain budget approval to purchase additional computers and software required to automate their recordkeeping.

Recommendation

We recommend the Traffic and Lighting Division inquire of the Information Technology Service Agency if there is any means currently available to have their operating information (such as dispatcher logs and the status of resulting work assignments) either

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entered into a new or existing networked database system or a networked spreadsheet program (such as Excel), with appropriate access controls.

Management's Response

We wholeheartedly agree that more automation would improve our recordkeeping and we are working with Information Technology Services to move forward with this. Timeframe for this depends on funding.

5. **Opportunity to Improve Timeliness of Property Damage Notification**

In order to expedite billing and potential collections from parties responsible for damages to City property, it is important that those parties be identified as soon as possible. Traffic and Lighting Division property damage that is not due to the property being struck by vehicles (e.g., a contractor cutting a power cable while digging) will generally not have a police report.

Contractors who cause damage to Traffic and Lighting Division property frequently do not notify the Division. Instead, the employee who determines the problem cause checks with the Dir. of Streets Office to identify what contractor was issued an Excavation Permit at the problem location. Identification of the responsible party, and often determining the actual cause of a reported problem, is delayed. Subsequently, the billing process is delayed. There are currently no legal penalties in place for contractors who fail to report damage they cause to City traffic or lighting property while doing excavation work.

Recommendation

We recommend the Traffic and Lighting Division management seek to have legal penalties established for contractors who knowingly fail to report damage they cause to City traffic or lighting property.

Management's Response

Again, we agree with this recommendation and I am currently working with the attorney for the Board of Alderman to come up with an ordinance to this effect. He is currently searching nationwide to determine whether other cities have already developed such ordinances. This should be done by April 1, 2007.

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6. Opportunity to Improve Property Damage Billing Efficiency by Automation

Billing, tracking, and collection of accounts receivable are business activities that are most efficiently performed using automated systems. The Traffic and Lighting Division property damage billing process is primarily manually performed. We noted the following:

- a. When invoices are typed from an M/S Word template, the next available invoice number must be entered manually. The invoice numbering system is not as reliable for control purposes as it could be the numbers were automatically assigned by the computer.
- b. After reviewing the typed invoices, the Accountant II manually enters the same invoice information into the Traffic Billing spreadsheet. This is a duplication of effort that could be eliminated by using a more automated billing and accounts receivable system.
- c. The billing spreadsheet is not set up to produce an invoice-aging schedule. As a result, the department staff and management did not have ready access to current information about the status of delinquent accounts to facilitate timely follow-up collection efforts.

Recommendation

We recommend the Traffic and Lighting Division inquire of the Information Technology Service Agency if there is any means currently available to have enhance the automation and efficiency of their billing and accounts receivable information system.

Management's Response

I will contact Information Technology Services to see if there are any means currently available to enhance our billing and accounts receivable information. Timeframe would depend on what's available and funding.

7. Opportunity to Improve Controls over Cash Receipts

Accounting principles recommend segregation of duties if a single person performs two or more incompatible functions (for example: billing, receiving payments, and recording cash receipts). If circumstances such as limited personnel prevent proper segregation,

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compensating controls should be emphasized. A Street Department accountant performed the following functions which were incompatible in the process of billing and collecting from parties responsible for damaging Traffic and Lighting Division property (electronic traffic signals, traffic signs, or street lights):

1. Recorded and mailed the billing invoices, and was responsible for following up on delinquent payments.
2. Received invoice payment checks and posted them to the billing Spreadsheet Register and individual account receivable records
3. Posted the payments to the Property Damage Account in the Traffic and Lighting Division's detailed General Ledger.
4. Prepared the daily cash receipts deposit to the Treasurer's Office.
5. Reconciled the division's Property Damage Account in the monthly City General Ledger Report to the Traffic and Lighting Division's General Ledger.

Recommendation

We recommend the Traffic and Lighting Division management develop a cash receipt log (preferably on a computer) for payments received through the mail, and have the person who opens the mail immediately record all payments received. At a minimum, the following should be recorded to the log:

- Amount received.
- Check/money order date.
- Payer.
- Check number.
- Initials of employee.

The payments on the log should be regularly reconciled, by someone independent of the billing and cash receipt functions, to the cash receipts included in the daily deposit to the Treasurer's Office.

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We further recommend the reconciliation of Traffic and Lighting Division revenue accounts in the monthly City General Ledger reports to the Traffic and Lighting Division General ledger be performed by someone who does not receive and record invoice payments.

Management's Response

We are already in the process of instituting your recommendations. This should be completed by December 1, 2006.

8. **Opportunity to Enhance Documentation of Training and Education**

Documentation of relevant staff training, education and experience was not readily accessible from the files of the Traffic and Lighting Division. Traffic and Lighting Division management, in conjunction with the Personnel Department, determined the adequate extent of knowledge and skills needed to perform the duties of the engineers, electrical technicians, and electrical foremen who are responsible for operation and maintenance of the traffic signal and street lighting systems. Job experience, and/or

education and training classes that would likely provide the requisite levels of knowledge and skills for each position were included in the Minimum Qualifications listed on the Personnel Requisitions submitted to the Personnel Department by the Traffic and Lighting Division.

Sound business practices suggest that documentation of relevant staff training and experience and, if possible, a database summarizing that information should be readily maintained in a readily accessible location and format to facilitate:

1. Management decisions on matching qualifications of available staff to the requirements of certain specific work assignments.
2. Confirming, if necessary, that the qualifications of the technicians and supervisory staff meet standards established by recognized code-setting and/or training authorities.

Due to the absence of an accessible records system, retrieval of information on staff training, education and experience may be too cumbersome and time consuming to meet some potential management needs.

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Recommendation

We recommend the Traffic and Lighting Division establish and maintain a file on relevant staff training and experience and, as soon as possible, a database summarizing that information, in a readily accessible format.

Management's Response

We agree that it is important to have this information, especially for our signal electricians and supervisors who are involved in court cases. I will have our Signal Engineer develop such a file. This should be done by March 1, 2007.

9. **Opportunity to Restore Regular Traffic Studies and Volume Counts**

Due to budget constraints that have occurred in recent years, there are currently no data collection employees in the division's Traffic Studies Section. (The Deputy Traffic Commissioner manages that function in addition to his other duties.) As a result, the Traffic and Lighting Division has not regularly performed traffic studies or traffic volume counts for at least two years. The Deputy Commissioner performs on-demand traffic studies of problem locations only (e.g., intersections with high accident rates).

Regular performance of traffic studies and traffic volume counts are necessary to determine if changes such as installation or electronic signals or adjustments of their cycle times, installation of stop signs, or establishment of turning lanes and/or signals should be made to improve safety or efficiency of traffic movement through an intersection. In the absence of those activities, the Traffic and Lighting Division's ability to proactively determine the changes necessary to improve the safety and efficiency of traffic movement through various intersections before problems occur has been seriously diminished.

Recommendation

We recommend the Traffic and Lighting Division management seek to identify viable alternative sources of sufficient funding to at least employ part-time or contracted data collection personnel to perform the necessary traffic studies and volume counts and identify needed changes in traffic controls. In view of the anticipated effects on City traffic of the impending reconstruction work on Highway 40/ I-64; entities such as:

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- the Missouri Department of Transportation
- the U. S. Department of, Transportation
- the East-West Gateway Coordinating Council

in addition to area business organizations such as Downtown St. Louis Partnership, Inc. and Civic Progress may be possible sources of such funding, or provide assistance in identifying other sources.

Management's Response

I will have my Deputy Commissioner contact the agencies and organizations which you mentioned to see if there is funding available and search for other organizations that might have funding. Timeframe will depend on the availability of funds.