City of Wasco

Triennial Performance Audit FY 15/16 - 17/18
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Chapter 1

Executive Summary

In 2018, the Kern Council of Governments (Kern COG) selected Moore & Associates, Inc., to prepare Triennial Performance Audits of itself as the RTPA and the twelve transit operators to which it allocates TDA funding. Moore & Associates is a consulting firm specializing in public transportation. Selection of the consultant followed a competitive procurement process.

The California Public Utilities Code requires all recipients of Transit Development Act (TDA) Article 4 funding to complete an independent audit on a three-year cycle in order to maintain TDA funding eligibility. Audits of Article 8 recipients are encouraged.

The Triennial Performance Audit is designed to be an independent and objective evaluation of the City of Wasco as a public transit operator, providing operator management with information on the economy, efficiency, and effectiveness of its programs across the prior three fiscal years. In addition to assuring legislative and governing bodies (as well as the public) that resources are being economically and efficiently utilized, the Triennial Performance Audit fulfills the requirement of PUC Section 99246(a) that the RTPA designate an entity other than itself to conduct a performance audit of the activities of each operator to whom it allocates TDA funds.

This chapter summarizes key findings and recommendations developed during the Triennial Performance Audit (TPA) of the City of Wasco’s public transit program for the period Fiscal Year 2015/16 through Fiscal Year 2017/18.

The City of Wasco operates the Wasco Dial-A-Ride, a curb-to-curb, demand-response service open to the general public. The service operates within Wasco city limits, with additional service provided to the nearby state prison. Service is limited to paved and maintained roads only. Service hours are Monday through Saturday from 8:00 a.m. to 3:30 p.m. There is no service on Sundays or designated holidays. All vehicles are ADA-compliant.

This performance audit was conducted in accordance with generally accepted government auditing standards. Those standards require the audit team plans and performs the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for its findings and conclusions based on the audit objectives. Moore & Associates believes the evidence obtained provides a reasonable basis for our findings and conclusions.

This audit was also conducted in accordance with the processes established by the California Department of Transportation (Caltrans), as outlined in the Performance Audit Guidebook for Transit Operators and Regional Transportation Planning Entities.
The Triennial Performance Audit includes five elements:

- Compliance requirements,
- Follow-up of prior report recommendations,
- Analysis of program data reporting,
- Performance Audit, and
- Functional review.

Test of Compliance
With two exceptions, the City of Wasco met the test of compliance with respect to all Transportation Development Act (TDA) regulations:

1. The City does not use the TDA definition in calculating FTE on its State Controller Reports.
2. The City did not achieve a farebox recovery ratio of 10 percent in FY 2017/18.

Status of Prior Recommendations

1. The City should ensure it submits its State Controller Transit Operator Financial Transaction Reports within the established timeframe.
   
   **Status:** Implemented.

2. The City should begin reporting FTE using the TDA definition on all State Controller Reports.
   
   **Status:** Partially implemented.

3. Increase or revise staffing to ensure full service coverage.
   
   **Status:** Not implemented.

   
   **Status:** Not implemented.

Findings and Recommendations
Based on discussions with the City, analysis of program performance, and a review of program compliance and function, Moore & Associates submits two compliance findings for the City of Wasco:

1. The City does not use the TDA definition in calculating FTE on its State Controller Reports.
2. The City did not achieve a farebox recovery ratio of 10 percent in FY 2017/18.

Moore & Associates has identified two functional finding. While these findings do not affect TDA compliance, we believe they warrant inclusion within this audit:

1. The City does not maintain sufficient staffing to ensure full coverage and capacity every service day.

<table>
<thead>
<tr>
<th>TDA Compliance Recommendations</th>
<th>Importance</th>
<th>Timeline</th>
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<tr>
<td>1 Use the TDA definition in calculating FTE for reporting to the State Controller.</td>
<td>High</td>
<td>FY 2018/19</td>
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<tr>
<td>2 Identify strategies to bring the farebox recovery ratio above 10 percent.</td>
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<td>FY 2018/19</td>
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<table>
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<tr>
<th>Functional Recommendations</th>
<th>Importance</th>
<th>Timeline</th>
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<tr>
<td>1 Increase or revise staffing to ensure full coverage.</td>
<td>Medium</td>
<td>FY 2019/20</td>
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Chapter 2
Review Scope and Methodology

The Triennial Performance Audit (TPA) of the City of Wasco’s public transit program covers the three-year period ending June 30, 2018. The California Public Utilities Code requires all recipients of Transit Development Act (TDA) funding to complete an independent review on a three-year cycle in order to maintain TDA funding eligibility.

In 2018, the Kern Council of Governments selected Moore & Associates, Inc., to prepare Triennial Performance Audits of itself as the RTPA and the twelve transit operators to which it allocates TDA funding. Moore & Associates is a consulting firm specializing in public transportation. Selection of the consultant followed a competitive procurement process.

The Triennial Performance Audit is designed to be an independent and objective evaluation of the City of Wasco as a public transit operator. Direct benefits of a Triennial Performance Audit include providing operator management with information on the economy, efficiency, and effectiveness of its programs across the prior three years; helpful insight for use in future planning; and assuring legislative and governing bodies (as well as the public) that resources are being economically and efficiently utilized. Finally, the Triennial Performance Audit fulfills the requirement of PUC Section 99246(a) that the RTPA designate an entity other than itself to conduct a performance audit of the activities of each transit operator to which it allocates TDA funds.

This performance audit was conducted in accordance with generally accepted government auditing standards. Those standards require the audit team plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for its findings and conclusions based on the audit objectives. Moore & Associates believes the evidence obtained provides a reasonable basis for our findings and conclusions.

The audit was also conducted in accordance with the processes established by the California Department of Transportation (Caltrans), as outlined in the Performance Audit Guidebook for Transit Operators and Regional Transportation Planning Entities, as well as Government Audit Standards published by the U.S. Comptroller General.

Objectives
A Triennial Performance Audit has five primary objectives:

1. Assess compliance with TDA regulations;
2. Review improvements subsequently implemented as well as progress toward adopted goals;
3. Review the accuracy of data reporting;
4. Evaluate the efficiency and effectiveness of the transit operator; and
5. Provide sound, constructive recommendations for improving the efficiency and functionality of the transit operator.
Scope
The TPA is a systematic review of performance evaluating the efficiency, economy, and effectiveness of the transit operator. The audit of the City of Wasco included five tasks:

1. A review of compliance with TDA requirements and regulations.
2. An assessment of the implementation of recommendations contained in prior performance audits.
3. A verification of the methodology for calculating performance indicators including the following activities:
   - Assessment of internal controls,
   - Test of data collection methods,
   - Calculation of performance indicators, and
   - Evaluation of performance.
4. Examination of the following functions:
   - General management and organization;
   - Service planning;
   - Scheduling, dispatching, and operations;
   - Personnel management and training;
   - Administration;
   - Marketing and public information; and
   - Fleet maintenance.
5. Conclusions and recommendations to address opportunities for improvement based upon analysis of the information collected and the audit of the transit operator’s major functions.

Methodology
The methodology for the Triennial Performance Audit of the City of Wasco included thorough review of documents relevant to the scope of the audit, as well as information contained on the City’s website. The documents reviewed included the following (spanning the full three-year period):

- Triennial Performance Audit report for the prior audit period;
- Monthly performance reports;
- State Controller Reports;
- NTD reports;
- Annual budgets;
- TDA fiscal audits;
- Transit marketing collateral;
- Fleet inventory;
- Preventive maintenance schedules and forms;
- Accident/road call logs;
- Customer complaint logs;
- Short Range Transit Plan; and
- Organizational chart.
The methodology for this review included a site visit to Wasco city hall (746 Eighth Avenue, Wasco) on October 15, 2018. The site visit included interviews with Jeremy Bowman (Acting Public Works Director), Lamar Rodriguez (City Treasurer), Diego Viramontes (Accounting Manager), Esperanza Peneda (Accounts Payable), and Monica Flores (driver); as well as additional staff from Accounting, Payroll, and Maintenance.

This report is comprised of eight chapters divided into three sections:

1. Executive Summary: A summary of the key findings and recommendations developed during the Triennial Performance Audit process.
2. TPA Scope and Methodology: Methodology of the review and pertinent background information.
3. TPA Results: In-depth discussion of findings surrounding each of the subsequent elements of the audit:
   - Compliance with statutory and regulatory requirements,
   - Progress in implementing prior recommendations,
   - Data analysis,
   - Performance measures and trends,
   - Functional audit, and
   - Findings and recommendations.
This section examines the City of Wasco’s compliance with the Transportation Development Act as well as relevant sections of the California Code of Regulations. An annual certified fiscal audit confirms TDA funds were apportioned in conformance with applicable laws, rules, and regulations. The Kern Council of Governments considers full use of funds under California Code of Regulations (CCR) 6754(a) as referring to operating funds but not capital funds. The TPA findings and related comments are delineated in Exhibit 3.1.

Compliance was determined through discussions with City of Wasco staff as well as a physical inspection of relevant documents including the fiscal audits for each year of the triennium, TDA claim forms, State Controller annual filings, California Highway Patrol terminal inspections, year-end performance reports, and other compliance-related documentation.

With two exceptions, the City of Wasco met the test of compliance with respect to all Transportation Development Act (TDA) regulations:

1. The City does not use the TDA definition in calculating FTE on its State Controller Reports.
2. The City did not achieve a farebox recovery ratio of 10 percent in FY 2017/18.

Recent Changes Regarding Compliance

Two changes specific to the TDA and TDA funding went into effect beginning July 1, 2016. The first change was an amendment to the Public Utilities Code specific to the definition of operating cost and what costs can be excluded. It should be noted that many of the exclusions pertain only to changes in certain costs, either over the prior year or beyond the change in the Consumer Price Index. They do not apply to all costs related to specified exclusion categories.

Senate Bill 508, dated October 9, 2015, amended Section 99268.17 to read as follows:

99268.17 (a) Notwithstanding subdivision (a) of Section 99247, the following costs shall be excluded from the definition of “operating cost” for the purposes of calculating any required ratios of fare revenues to operating cost specified in this article:

(1) The additional operating costs required to provide comparable complementary paratransit service as required by Section 37.121 of Title 49 of the Code of Federal Regulations, pursuant to the federal Americans with Disabilities Act of 1990 (42 U.S.C. Sec. 120101 et seq.), as identified in the operator’s paratransit plan pursuant to Section 37.139 of Title 49 of the Code of Federal Regulations that exceed the operator’s costs required to provide comparable paratransit service in the prior year as adjusted by the Consumer Price Index.

(2) Cost increases beyond the change in the Consumer Price Index for all of the following:
(A) Fuel.
(B) Alternative fuel programs.
(C) Power, including electricity.
(D) Insurance premiums and payments in settlement of claims arising out of the operator’s liability.
(E) State and federal mandates.

(3) Startup costs for new services for a period of not more than two years.

(b) The exclusion of costs from the definition of operating costs in subdivision (a) applies solely for the purpose of this article and does not authorize an operator to report an operating cost other than as defined in subdivision (a) of Section 99247 or a ratio of fare revenue to operating cost other than as that ratio is described elsewhere in this article, to any of the following entities:

(1) The Controller pursuant to Section 99243.
(2) The entity conducting the fiscal audit pursuant to Section 99245.
(3) The entity conducting the performance audit pursuant to Section 99246.

The second change, also contained within Senate Bill 508, related to the type of funds that can be used to supplement farebox revenue. Prior to this bill, “local funds” was defined as “revenues derived from taxes imposed by the operator or by a county transportation commission.” Senate Bill 508 amended Section 99268.19 to read:

99268.19 If fare revenues are insufficient to meet the applicable ratio of fare revenues to operating cost required by this article, an operator may satisfy that requirement by supplementing its fare revenues with local funds. As used in this section, “local funds” means any non-federal or non-state grant funds or other revenues generated by, earned by, or distributed to an operator.

This expanded definition opens up new revenue sources that can be used to offset farebox shortfalls. Applicable revenues include funds received through advertising, interest income, sale of surplus vehicles, and other such sources. While these funds are no longer limited to those generated by local taxes, they cannot be state or federal funds.

Another change affected the submittal deadline for the State Controller’s Transit Operators Financial Transaction Report. Beginning with Fiscal Year 2016/17, the submittal deadline was changed from 110 days following the end of the fiscal year (typically October 18-20) to seven months following the end of the fiscal year (January 31). The original submittal deadline was in force during reporting for FY 2015/16, while the new deadline was utilized for FY 2016/17 forward.
## Exhibit 3.1 Transit Development Act Compliance Requirements

<table>
<thead>
<tr>
<th>Compliance Element</th>
<th>Reference</th>
<th>Compliance</th>
<th>Comments</th>
</tr>
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</table>
| State Controller Reports submitted on time. | PUC 99243     | In compliance       | FY 2015/16: October 14, 2016  
FY 2016/17: October 16, 2017  
FY 2017/18: January 31, 2019 |
| Fiscal and compliance audits submitted within 180 days following the end of the fiscal year (or with up to 90-day extension). | PUC 99245     | Not in compliance*   | FY 2015/16: June 8, 2017  
FY 2016/17: June 27, 2018  
FY 2017/18: Not provided |
| Operator’s terminal rated as satisfactory by CHP within the 13 months prior to each TDA claim. | PUC 99251 B    | In compliance       | March 12, 2015  
March 23, 2016  
April 19, 2017  
April 11, 2018 |
| Operator’s claim for TDA funds submitted in compliance with rules and regulations adopted by the RTPA. | PUC 99261     | In compliance       |
| If operator serves urbanized and non-urbanized areas, it has maintained a ratio of fare revenues to operating costs at least equal to the ratio determined by the rules and regulations adopted by the RTPA. | PUC 99270.1    | Not applicable      |
| An operator receiving allocations under Article 8(c) may be subject to regional, countywide, or subarea performance criteria, local match requirements, or fare recovery ratios adopted by resolution of the RTPA. | PUC 99405     | Not applicable      |
| The operator’s operating budget has not increased by more than 15% over the preceding year, nor is there a substantial increase or decrease in the scope of operations or capital budget provisions for major new fixed facilities unless the operator has reasonably supported and substantiated the change(s). | PUC 99266     | In compliance       | FY 2015/16: +12.55%  
FY 2016/17: +25.65%  
FY 2017/18: +9.52%  
Source: FY 2015 – FY 2017 State Controller Reports. |
| The operator’s definitions of performance measures are consistent with the Public Utilities Code Section 99247. | PUC 99247     | Finding             | The City does not use the TDA definition in calculating Full-Time Equivalent (FTE) Employee. |

*While the City was not in compliance with this requirement, it is not identified as a finding given the contract for TDA fiscal audits is through Kern COG and the City has little, if any, control over the project schedule.*
If the operator serves an urbanized area, it has maintained a ratio of fare revenues to operating cost at least equal to one-fifth (20 percent).

Reference: PUC 99268.2, 99268.4, 99268.1

Comments: Not applicable

Finding FY 2015/16: 12.42%
FY 2016/17: 14.80%
FY 2017/18: 9.65%


If the operator serves a rural area, it has maintained a ratio of fare revenues to operating cost at least equal to one-tenth (10 percent).

Reference: PUC 99268.2, 99268.4, 99268.5

Comments: Not applicable

For a claimant that provides only services to elderly and handicapped persons, the ratio of fare revenues to operating cost shall be at least 10 percent.

Reference: PUC 99268.5, CCR 6633.5

Comments: Not applicable

The current cost of the operator’s retirement system is fully funded with respect to the officers and employees of its public transportation system, or the operator is implementing a plan approved by the RTPA, which will fully fund the retirement system for 40 years.

Reference: PUC 99271

Comments: In compliance

City employees are eligible for CalPERS retirement benefits.

If the operator receives State Transit Assistance funds, the operator makes full use of funds available to it under the Urban Mass Transportation Act of 1964 before TDA claims are granted.

Reference: CCR 6754 (a) (3)

Comments: In compliance

As a recipient of State Transit Assistance Funds, the City is making full use of federal funds available under the Urban Mass Transportation Act of 1964 as amended.

FY 2016: $84,805 (Operating)
FY 2017: $80,792 (Operating)
FY 2018: $79,900 (Operating)

Source: National Transit Database.

In order to use State Transit Assistance funds for operating assistance, the operator’s total operating cost per revenue hour does not exceed the sum of the preceding year’s total plus an amount equal to the product of the percentage change in the CPI for the same period multiplied by the preceding year’s total operating cost per revenue hour. An operator may qualify based on the preceding year’s operating cost per revenue hour or the average of the three prior years. If an operator does not meet these qualifying tests, the operator may only use STA funds for capital purposes.

Reference: PUC 99314.6

Comments: In compliance
<table>
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<tr>
<th>Compliance Element</th>
<th>Reference</th>
<th>Compliance</th>
<th>Comments</th>
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<tbody>
<tr>
<td>A transit claimant is precluded from receiving monies from the Local Transportation Fund and the State Transit Assistance Fund in an amount which exceeds the claimant’s capital and operating costs less the actual amount of fares received, the amount of local support required to meet the fare ratio, the amount of federal operating assistance, and the amount received during the year from a city or county to which the operator has provided services beyond its boundaries.</td>
<td>CCR 6634</td>
<td>In compliance</td>
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Prior Recommendations

This section reviews and evaluates the implementation of prior Triennial Performance Audit recommendations. This objective assessment provides assurance the City of Wasco has made quantifiable progress toward improving both the efficiency and effectiveness of its public transit program.

The prior audit – completed in March 2016 by Moore & Associates, Inc. for the three fiscal years ending June 30, 2015 – included four recommendations:

1. The City should ensure it submits its State Controller Transit Operator Financial Transaction Reports within the established timeframe.

   **Discussion:** Public Utilities Code Section 99243 requires transit operators in receipt of TDA Article 4 funds to submit annual reports to the State Controller within 90 days following the end of the fiscal year (110 days if filing electronically).

   The City submitted its State Controller Report for FY 2013/14 nearly a full year late. Other State Controller Reports prepared during the audit period were submitted on time. The prior auditor noted that given that subsequent reports were submitted on time, it was likely that this issue had already been resolved.

   **Progress:** All State Controller Reports submitted during the current audit period were submitted on time.

   **Status:** Implemented.

2. The City should begin reporting FTE using the TDA definition on all State Controller Reports.

   **Discussion:** The Transit Operators Financial Transaction Report Instructions published by the State Controller state the following with respect to the reporting of Total Employees – Public and Contract:

   *Report the number of employee equivalents. Public Utilities Code section 99247(j) defines "Vehicle service hours per employee" as the vehicle service hours divided by the number of employees employed in connection with the public transportation system. Use the assumption that 2,000 person-hours of work in one year constitutes one employee. The number of employees shall also include those individuals employed by the operator which provide services to the agency of the operator responsible for the*
operation of the public transportation system even though not employed in that agency.\(^1\)

The City of Wasco did not report Full-Time Equivalent (FTE) employees on its State Controller Report for any year of the prior audit period. During the site visit, staff noted that they believed actual person-count is used to calculate FTE.

The prior audit team recommended payroll records be used to document the total amount of time spent on transit, and use that figure (divided by 2,000) to calculate FTE for reporting to the State Controller.

**Progress:** While the City is now reporting FTE on its State Controller Reports, it was noted during the site visit that it is still being miscalculated.

**Status:** Partially implemented.

3. Increase or revise staffing to ensure full service coverage.

**Discussion:** Scheduling, Dispatch, and Operations is one functional area reviewed as part of the Triennial Performance Audit. The lack of cover drivers (or additional staff capable of filling in for an absent driver) has a negative impact on the effective functioning of the transit program. Currently, a driver absence (whether due to illness or vacation) results in service capacity being reduced by half (going from two vehicles to one vehicle). This affects trip availability on those days when only one driver is unavailable.

The prior auditor recommended the City identify strategies to supply an additional driver (such as a part-time driver) that can be called upon to substitute for one of the regular drivers and provide additional capacity if warranted.

**Progress:** The City continues to employ only two full-time drivers, reducing service capacity by half when one driver is not available.

**Status:** Not implemented.


**Discussion:** Given that the City’s transit operations were conducted with fewer staff positions than when the DAR manual was created in 2008, the prior auditors recommended the City update its resource manual for DAR employees. The update should include updated roles, responsibilities, and protocols reflective of current staffing levels. It should also

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reflect current organizational structure and staffing, as well as any changes to the service delivery policies and procedures.

**Progress:** The City has not updated its DAR manual and continues to use the 2008 version.

**Status:** Not implemented.
Chapter 5
Data Reporting Analysis

An important aspect of the Triennial Performance Audit process is assessing how effectively and consistently the transit operator reports performance statistics to local, state, and federal agencies. Often as a condition of receipt of funding, an operator must collect, manage, and report data to different entities. Ensuring such data are consistent can be challenging given the differing definitions employed by different agencies as well as the varying reporting timeframes. This chapter examines the consistency of performance data reported by the City of Wasco to the State Controller and Federal Transit Administration specific to the audit period. Submissions to these entities were included within the State Controller’s Transit Operators Financial Transactions Report (TOR) and the National Transit Database (NTD) report, respectively.

Exhibit 5.1 provides a comparison between performance data reported within the TOR and NTD reports for the current audit period (ending FY 2015/16 through FY 2017/18) and the data reported via monthly performance reports and TDA fiscal audits.

- **Operating Cost**: Operating cost does not appear to be consistently reported. In FY 2015/16, data reported to on the TDA fiscal audit and TOR are similar, though in FY 2016/17 they have a variance of approximately 22 percent. NTD data for both years was significantly higher, which may have been due to the inclusion of depreciation amounts in the NTD data (depreciation is excluded from the TOR and fiscal audit reports).
- **Fare Revenue**: Fare revenue was consistent among all three reports in FY 2015/16, but in FY 2016/17 was significantly lower in the NTD report than the other two reports. The reason for the discrepancy is unclear.
- **Vehicle Service Miles**: Vehicle service miles was not reported on the FY 2015/16 TOR. Otherwise this data was consistently reported.
- **Full-time Equivalent Employees**: The City did not provide sufficient information for the audit team to determine how it was calculating FTE, but appears to be using a person-count.
## Exhibit 5.1 Data Reporting Consistency

<table>
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<th>System-Wide FY 2016/17</th>
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<td>Per TDA methodology</td>
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Chapter 6

Performance Analysis

Performance indicators are typically employed to quantify and assess the efficiency of a transit operator’s activities. Such indicators provide insight into current operations as well as trend analysis of operator performance. Through a review of indicators, relative performance as well as possible inter-relationships between major functions is revealed.

The Transportation Development Act (TDA) requires recipients of TDA funding to track and report five performance indicators:

- Operating Cost/Passenger,
- Operating Cost/Vehicle Service Hour,
- Passengers/Vehicle Service Hour,
- Passengers/Vehicle Service Mile, and
- Vehicle Service Hours/Employee.

To assess the validity and use of performance indicators, the audit team performed the following activities:

- Assessed internal controls in place for the collection of performance-related information,
- Validated collection methods of key data,
- Calculated performance indicators, and
- Evaluated performance indicators.

The procedures used to calculate TDA-required performance measures for the current triennium were verified and compared with indicators included in similar reports to external entities (i.e., State Controller and Federal Transit Administration).

Operating Cost

The Transportation Development Act requires an operator to track and report transit-related costs reflective of the Uniform System of Accounts and Records developed by the State Controller and the California Department of Transportation. The most common method for ensuring this occurs is through a compliance audit report prepared by an independent auditor in accordance with California Code of Regulations Section 6667. The annual independent financial audit should confirm the use of the Uniform System of Accounts and Records. Operating cost – as defined by PUC Section 99247(a) – excludes the following:

---

2 CCR Section 6667 outlines the minimum tasks which must be performed by an independent auditor in conducting the annual fiscal and compliance audit of the transit operator.
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- Cost in the depreciation and amortization expense object class adopted by the State Controller pursuant to PUC Section 99243,
- Subsidies for commuter rail services operated under the jurisdiction of the Interstate Commerce Commission,
- Direct costs of providing charter service, and
- Vehicle lease costs.

Vehicle Service Hours and Miles

*Vehicle Service Hours* (VSH) and *Miles* (VSM) are defined as the time/distance during which a revenue vehicle is available to carry fare-paying passengers, and which includes only those times/miles between the time or scheduled time of the first passenger pickup and the time or scheduled time of the last passenger drop-off during a period of the vehicle's continuous availability.\(^3\) For example, demand-response service hours include those hours when a vehicle has dropped off a passenger and is traveling to pick up another passenger, but not those hours when the vehicle is unavailable for service due to driver breaks or lunch. For both demand-response and fixed-route services, service hours will exclude hours of "deadhead" travel to the first scheduled pick-up, and will also exclude hours of "deadhead" travel from the last scheduled drop-off back to the terminal. For fixed-route service, a vehicle is in service from first scheduled stop to last scheduled stop, whether or not passengers board or exit at those points (i.e., subtracting driver lunch and breaks but including scheduled layovers).

Passenger Counts

According to the Transportation Development Act, *total passengers* is equal to the total number of unlinked trips (i.e., those trips that are made by a passenger that involve a single boarding and departure), whether revenue-producing or not.

Employees

*Employee hours* is defined as the total number of hours (regular or overtime) which all employees have worked, and for which they have been paid a wage or salary. The hours must include transportation system-related hours worked by persons employed in connection with the system (whether or not the person is employed directly by the operator). Full-Time Equivalent (FTE) is calculated by dividing the number of person-hours by 2,000.

Fare Revenue

*Fare revenue* is defined by California Code of Regulations Section 6611.2 as revenue collected from the farebox plus sales of fare media. (Fare revenue does not include additional local revenues that can be used to supplement the farebox recovery ratio.)

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\(^3\) A vehicle is considered to be in revenue service despite a no-show or late cancellation if the vehicle remains available for passenger use.
TDA Required Indicators
To calculate the TDA indicators for the City of Wasco, the following sources were employed:

- Operating Cost was not independently calculated as part of this audit. Operating Cost data were obtained via TDA fiscal audits for each fiscal year covered by this audit. Operating Cost from the reports was compared against that reported to the State Controller and NTD and was determined to be consistent with TDA guidelines. In accordance with PUC Section 99247(a), the reported costs excluded depreciation and other allowable expenses.
- Fare Revenue was not independently calculated as part of this audit. Fare Revenue data were obtained via TDA fiscal audits for each fiscal year covered by this audit. Fare revenue from the reports is consistent with TDA guidelines.
- Vehicle Service Hours (VSH) data were obtained via State Controller Reports for each fiscal year covered by this audit. Data from these reports were then compared with information included within the City’s monthly performance data summary reports. The City’s calculation methodology is consistent with PUC guidelines.
- Vehicle Service Miles (VSM) data were obtained via State Controller Reports for each fiscal year covered by this audit. Data from these reports were then compared with information included within the City’s monthly performance data summary reports. This methodology is consistent with PUC guidelines.
- Unlinked trip data were obtained via State Controller reports for each fiscal year covered by this audit. Data from these reports were then compared with information included within the City’s monthly performance data summary reports. The City’s calculation methodology is consistent with PUC guidelines.
- Full-Time Equivalent (FTE) methodology was provided by the City and does not appear consistent with the TDA definition (hours worked divided by 2,000).

System Performance Trends
Operating costs fluctuated during the audit period, decreasing by 20.4 percent in FY 2015/16 and increasing by 73.5 percent in FY 2017/18. In FY 2015/16, the most significant drop in operating cost (20.4 percent) was accompanied by a 12.7 percent decrease in ridership, 11.4 percent decrease in vehicle service miles, 13.9 percent decrease in fare revenue, and a 14.6 percent increase in vehicle service hours. All performance measures increased significantly in FY 2016/17 except for operating cost, which rose only 4.9 percent. This resulted in notable improvements in nearly all performance indicators.
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Operating Cost (Actual $)</td>
<td>$216,644</td>
<td>$229,867</td>
<td>$210,235</td>
<td>$167,309</td>
<td>$175,509</td>
<td>$304,534</td>
</tr>
<tr>
<td>Annual Change</td>
<td>6.1%</td>
<td>-8.5%</td>
<td>-20.4%</td>
<td>4.9%</td>
<td>73.5%</td>
<td></td>
</tr>
<tr>
<td>Fare Revenue (Actual $)</td>
<td>$24,391</td>
<td>$26,333</td>
<td>$24,584</td>
<td>$21,169</td>
<td>$31,732</td>
<td>$29,374</td>
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<tr>
<td>Annual Change</td>
<td>8.0%</td>
<td>-6.6%</td>
<td>-13.9%</td>
<td>49.9%</td>
<td>-7.4%</td>
<td></td>
</tr>
<tr>
<td>Vehicle Service Hours (VSH)</td>
<td>2,016</td>
<td>2,160</td>
<td>2,000</td>
<td>2,292</td>
<td>3,579</td>
<td>3,445</td>
</tr>
<tr>
<td>Annual Change</td>
<td>7.1%</td>
<td>-7.4%</td>
<td>14.6%</td>
<td>56.2%</td>
<td>-3.7%</td>
<td></td>
</tr>
<tr>
<td>Vehicle Service Miles (VSM)</td>
<td>33,008</td>
<td>32,444</td>
<td>31,661</td>
<td>28,040</td>
<td>34,704</td>
<td>34,571</td>
</tr>
<tr>
<td>Annual Change</td>
<td>-2.0%</td>
<td>-2.1%</td>
<td>-11.4%</td>
<td>23.8%</td>
<td>-0.4%</td>
<td></td>
</tr>
<tr>
<td>Passengers</td>
<td>20,368</td>
<td>20,308</td>
<td>20,047</td>
<td>17,507</td>
<td>25,239</td>
<td>25,597</td>
</tr>
<tr>
<td>Annual Change</td>
<td>-0.3%</td>
<td>-1.3%</td>
<td>-12.7%</td>
<td>44.2%</td>
<td>1.4%</td>
<td></td>
</tr>
<tr>
<td>Employees</td>
<td>Not reported</td>
<td>Not reported</td>
<td>Not reported</td>
<td>2</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Annual Change</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Performance Indicators</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Operating Cost/VSH (Actual $)</td>
<td>$107.46</td>
<td>$106.42</td>
<td>$105.12</td>
<td>$73.00</td>
<td>$49.04</td>
<td>$88.40</td>
</tr>
<tr>
<td>Annual Change</td>
<td>-1.0%</td>
<td>-1.2%</td>
<td>-30.6%</td>
<td>-32.8%</td>
<td>80.3%</td>
<td></td>
</tr>
<tr>
<td>Operating Cost/Passenger (Actual)</td>
<td>$10.64</td>
<td>$11.32</td>
<td>$10.49</td>
<td>$9.56</td>
<td>$6.95</td>
<td>$11.90</td>
</tr>
<tr>
<td>Annual Change</td>
<td>6.4%</td>
<td>-7.3%</td>
<td>-8.9%</td>
<td>-27.2%</td>
<td>71.1%</td>
<td></td>
</tr>
<tr>
<td>Passengers/VSH</td>
<td>10.10</td>
<td>9.40</td>
<td>10.02</td>
<td>7.64</td>
<td>7.05</td>
<td>7.43</td>
</tr>
<tr>
<td>Annual Change</td>
<td>-6.9%</td>
<td>6.6%</td>
<td>-23.8%</td>
<td>-7.7%</td>
<td>5.4%</td>
<td></td>
</tr>
<tr>
<td>Passengers/VSM</td>
<td>0.62</td>
<td>0.63</td>
<td>0.63</td>
<td>0.62</td>
<td>0.73</td>
<td>0.74</td>
</tr>
<tr>
<td>Annual Change</td>
<td>1.8%</td>
<td>0.8%</td>
<td>-1.4%</td>
<td>16.5%</td>
<td>1.8%</td>
<td></td>
</tr>
<tr>
<td>Farebox Recovery</td>
<td>11.3%</td>
<td>11.5%</td>
<td>11.7%</td>
<td>12.7%</td>
<td>18.1%</td>
<td>9.6%</td>
</tr>
<tr>
<td>Annual Change</td>
<td>1.8%</td>
<td>2.1%</td>
<td>8.2%</td>
<td>42.9%</td>
<td>-46.7%</td>
<td></td>
</tr>
<tr>
<td>Hours/Employee</td>
<td>1,146.0</td>
<td>1,789.5</td>
<td>1722.5</td>
<td>1722.5</td>
<td>1722.5</td>
<td>1722.5</td>
</tr>
<tr>
<td>Annual Change</td>
<td>56.2%</td>
<td>-3.7%</td>
<td>-3.7%</td>
<td>-3.7%</td>
<td>-3.7%</td>
<td></td>
</tr>
<tr>
<td>TDA Non-Required Indicators</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Operating Cost/VSM</td>
<td>$6.56</td>
<td>$7.11</td>
<td>$6.64</td>
<td>$5.97</td>
<td>$5.06</td>
<td>$8.81</td>
</tr>
<tr>
<td>Annual Change</td>
<td>8.3%</td>
<td>-6.6%</td>
<td>-10.1%</td>
<td>-15.2%</td>
<td>74.2%</td>
<td></td>
</tr>
<tr>
<td>Annual Change</td>
<td>-8.5%</td>
<td>5.7%</td>
<td>-22.7%</td>
<td>-20.7%</td>
<td>3.5%</td>
<td></td>
</tr>
<tr>
<td>Fare/Passenger</td>
<td>$1.20</td>
<td>$1.30</td>
<td>$1.23</td>
<td>$1.21</td>
<td>$1.26</td>
<td>$1.15</td>
</tr>
<tr>
<td>Annual Change</td>
<td>8.3%</td>
<td>-5.4%</td>
<td>-1.4%</td>
<td>4.0%</td>
<td>-8.7%</td>
<td></td>
</tr>
</tbody>
</table>

Exhibit 6.2  System Ridership

Exhibit 6.3  System Operating Cost/VSH

Exhibit 6.4  System Operating Cost/VSM

Exhibit 6.5  System VSM/VSH
Exhibit 6.6  System Operating Cost/Passenger

Exhibit 6.7  System Passengers/VSH

Exhibit 6.8  System Passengers/VSM

Exhibit 6.9  System VSH/FTE
Exhibit 6.10  System Farebox Recovery

Exhibit 6.11  System Fare/Passenger


System Farebox Recovery:
- 2012/13: 11.3%
- 2013/14: 11.5%
- 2014/15: 11.7%
- 2015/16: 12.7%
- 2016/17: 18.1%
- 2017/18: 9.6%

System Fare/Passenger:
- 2012/13: $1.20
- 2013/14: $1.23
- 2014/15: $1.21
- 2015/16: $1.26
- 2016/17: $1.15
- 2017/18: $1.15
Chapter 7

Functional Review

A functional review of the City of Wasco’s public transit program is intended to assess the effectiveness and efficiency of the operator. Following a general summary of the City’s transit services, this chapter addresses seven functional areas. The list, taken from Section III of the Performance Audit Guidebook published by Caltrans, reflects those transit services provided by the City of Wasco through its transit program:

- General management and organization;
- Service planning;
- Scheduling, dispatch, and operations;
- Personnel management and training;
- Administration;
- Marketing and public information; and
- Fleet maintenance.

Service Overview

The City of Wasco operates the Wasco Dial-A-Ride, a curb-to-curb, demand-response service open to the general public. The service operates within Wasco city limits, with additional service provided to the nearby state prison. Service is limited to paved and maintained roads only. Service hours are Monday through Saturday from 8:00 a.m. to 3:30 p.m. There is no service on Sundays or designated holidays. All vehicles are ADA-compliant.

Trips are not prioritized based on trip purpose or trip type. Passes are available in lieu of cash fares and must be purchased at the City Hall Annex or by mail.

Exhibit 7.1  Fare Structure

<table>
<thead>
<tr>
<th>Passenger</th>
<th>One-Way Fare</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adult (within Wasco)</td>
<td>$1.75</td>
</tr>
<tr>
<td>Adult (to state prison)</td>
<td>$2.00</td>
</tr>
<tr>
<td>Seniors (62+)/Disabled</td>
<td>$1.00</td>
</tr>
<tr>
<td>Youth (5-10)</td>
<td>$1.00</td>
</tr>
<tr>
<td>Children (0-4)</td>
<td>$0.25</td>
</tr>
</tbody>
</table>

Exhibit 7.2  Pass Pricing Structure

<table>
<thead>
<tr>
<th>Passenger</th>
<th>Number of Rides</th>
<th>Pass Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Senior (62+) and Disabled Discount</td>
<td>11</td>
<td>$10.00</td>
</tr>
<tr>
<td>Adults (11-61)</td>
<td>13</td>
<td>$15.00</td>
</tr>
</tbody>
</table>
General Management and Organization
The City’s transit program is overseen by the Finance Director, who reports to the City Manager. The Finance Director is the point of contact for the RTPA and attends Kern COG’s TTAC meetings. The City’s Finance Director position is currently vacant, so the Accounting Manager has assumed oversight of the program.

The Wasco City Council is the governing body for the City’s transit service. Council meetings are held at City Hall (746 8th Street) on the first and third Tuesdays of each month at 6:00 pm. Voters elect the five-member City Council to four-year overlapping terms. The City Council selects one of its members to serve as Mayor, and appoints a City Manager to conduct the day-to-day business of the City. The City does not have a citizens’ advisory committee specific to transportation. The City Council has not expressed concern about any particular aspects of the transit program, though Wasco residents have expressed a desire for Saturday service.

Service Planning
The Kern Council of Governments (RTPA) is responsible for transit planning for the City of Wasco through the periodic development of a Short Range Transit Plan (SRTP) or Transit Development Plan (TDP). The most recent TDP was completed in May 2016. Recommendations have not yet been implemented and the majority appear to remain relevant to the City’s service.

There have been no service or fare changes within the three-year period covered by this audit. A rider survey was conducted as part of the development of the 2016 TDP.

Scheduling, Dispatch, and Operations
The City’s transit service is typically provided using two vehicles, with one vehicle reserved as a spare. If only one driver is available (due to illness or time off), the service is closed during the driver’s one-hour lunch that day. No advance reservations are accepted, only on-demand calls for same-day service. Dispatching is done manually, and drivers self-dispatch.

Fares are deposited into manual onboard fareboxes. Drivers remove the vaults and count the fares at the end of their shifts. The City does not have a secure cash room. Fare counting takes place at an open desk in city hall. A second staffer in the Accounting department verifies the count. The money is taken to Finance where it is stored in a safe. City deposits are picked up by armored car on a daily basis. Daily cash revenues are typically less than $100 per day.
In the past, the Finance Director was responsible for preparing monthly reports to the city council. The Accounting Manager has taken over that responsibility. Finance staff handles monthly fare revenue reconciliation using daily driver logs.

**Personnel Management and Training**
The City employs two full-time drivers. Both are full-time employees of the City and qualify for the City’s benefit package. There is currently no active recruitment for more drivers, though the City sees there may be a need for a part-time driver in the future. All City employees are subject to the same disciplinary policies.

Drivers are represented by the Service Employees International Union (SEIU) Local 521. Both drivers have a Class B license with passenger endorsement and GPPV. Driver training is provided by the Kern County Superintendent of Schools. Two hours of continuing training per year is also provided to drivers through the Kern County Superintendent of Schools or the Wasco school district. Safety meetings take place twice annually through the school district.

**Administration**
Budgeting is typically handled by the Finance Director. The City uses Munis Enterprise Resource Planning (ERP) software for budgeting. The City has a full-time grants writer located within the Finance department. The Accounting Manager oversees grant compliance.

Responsibility for risk management is shared by the Human Resources and Finance departments. The City is self-insured and has a process in place for accident/injury claims. The City is a member of the Central San Joaquin Valley Risk Management Authority (RMA)

An electronic time reporting system is used for payroll. Timecards are reviewed and approved (signed) three times – by the employee, supervisor, and department head. All hours are reviewed, and the employee has the opportunity to correct any errors. Payroll is processed in-house using the Munis system. Checks are signed by the Mayor, City Clerk, and City Treasurer (which is an elected position with a four-year term). Direct deposit is available to all employees, and the majority participate.

Accounts payable is separate from purchasing. There is a system in place to verify purchases. Any purchases greater than $10,000 go out to bid and must be approved by the City Council. Bus procurement is handled by the Public Works Director and Finance department.

The City does not have an internal audit function. Brown Armstrong conducts the City’s annual TDA fiscal audits.

**Marketing and Public Relations**
The City’s primary marketing tools are a bilingual brochure (English and Spanish) and a website with Dial-A-Ride information. A Spanish translation of the City’s website is available through a Google Transit widget, which translates the page text but not the content of linked files. The City does not advertise on its vehicles. The City conducts very little outreach and rarely participates in City events. Vehicles are used only for transit service, not for any special events. All complaints come to city hall; the City has a complaint resolution process in place.
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Maintenance
The City provides most vehicle maintenance in-house. Maintenance has two full-time City staff who conduct preventive maintenance employing a time-based PM plan (30- and 45-day). The only work that is sent out is major components and paint and body work. The City’s facility has a portable lift and a sufficient number of bays for the work that is conducted there. The maintenance facility serves all City vehicles and does not have a dedicated transit bay. Work is documented using paper forms, and the maintenance facility has office space for records storage. No parts are stocked. The City does not contract out any maintenance services.

Transit vehicles are gas- and CNG-fueled. Vehicles are equipped with wheelchair lifts, fire extinguishers, and first aid kits, but do not include bike racks. A fleet replacement plan is included in the City’s most recent TDP.

Maintenance advises the drivers regarding fleet status and upcoming preventive maintenance work. Radios provide communications between drivers and maintenance staff.

Exhibit 7.4 Fleet Inventory

<table>
<thead>
<tr>
<th>Vehicle #</th>
<th>Year</th>
<th>Make</th>
<th>Model</th>
<th>PAX</th>
<th>WC</th>
<th>Fuel</th>
<th>Mileage</th>
</tr>
</thead>
<tbody>
<tr>
<td>60</td>
<td>2016</td>
<td>Ford</td>
<td>E-450</td>
<td>16</td>
<td>2</td>
<td>Gas</td>
<td>43,993</td>
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<tr>
<td>62</td>
<td>2007</td>
<td>Chevy</td>
<td>5500</td>
<td>20</td>
<td>2</td>
<td>CNG</td>
<td>77,435</td>
</tr>
<tr>
<td>63</td>
<td>2016</td>
<td>Ford</td>
<td>E-450</td>
<td>16</td>
<td>2</td>
<td>CNG</td>
<td>36,744</td>
</tr>
<tr>
<td>69</td>
<td>2012</td>
<td>Ford</td>
<td>E150XL</td>
<td>8</td>
<td>0</td>
<td>Gas</td>
<td>41,056</td>
</tr>
</tbody>
</table>
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Wasco Dial-A-Ride cutaway vehicle.

Wasco Dial-A-Ride cutaway vehicle.

Wasco Dial-A-Ride van.

Interior of cutaway vehicle.
Wheelchair lift on cutaway vehicle.

Farebox on cutaway vehicle.

Infant car seat for young rider safety.

Toddler car seat for young rider safety.
Chapter 8

Findings and Recommendations

Conclusions
With one exception, Moore & Associates finds the City of Wasco to be in compliance with the requirements of the Transportation Development Act. In addition, the entity generally functions in an efficient, effective, and economical manner.

Findings and Recommendations
Based on discussions with City staff, analysis of program performance, and an audit of program compliance and function, the audit team presents one compliance finding:

1. The City does not use the TDA definition in calculating FTE on its State Controller Reports.

Moore & Associates has identified two functional finding. While these findings do not affect TDA compliance, we believe they warrant inclusion within this audit:

1. The City does not maintain sufficient staffing to ensure full coverage and capacity every service day.

Program Recommendations
In completing this Triennial Performance Audit, Moore & Associates submits the following recommendations for the City of Wasco. They are divided into two categories: TDA Program Compliance Recommendations and Functional Recommendations. TDA Program Compliance Recommendations are intended to assist in bringing the operator into compliance with the requirements and standards of the TDA, while Functional Recommendations address issues identified during the audit that are not specific to TDA compliance.

Compliance Finding 1: The City does not use the TDA definition in calculating FTE on its State Controller Reports.

Criteria: The Transit Operators Financial Transaction Report Instructions published by the State Controller state the following with respect to the reporting of Total Employees – Public and Contract:

Report the number of employee equivalents. Public Utilities Code section 99247(j) defines "Vehicle service hours per employee" as the vehicle service hours divided by the number of employees employed in connection with the public transportation system. Use the assumption that 2,000 person-hours of work in one year constitutes one employee. The number of employees shall also include those individuals employed by the operator
which provide services to the agency of the operator responsible for the operation of the public transportation system even though not employed in that agency.⁴

**Condition:** The prior audit noted during the site visit that not only was the City calculating FTE incorrectly, but it also failed to report that data on the State Controller Report. Beginning in FY 2015/16, the City did report this data to the State Controller, but it was noted during the site visit that it was still being miscalculated. It appears a person-count is being used to calculate FTE, which does not take into account any time worked by non-driver staff (such as Finance or Maintenance).

**Cause:** There may be a disconnect between the individual responsible for preparation of the State Controller Report and those who review the Triennial Performance Audit findings, or a lack of understanding of how the FTE metric is defined by the State Controller. In addition, recent staffing changes may have reduced any historic/institutional knowledge regarding this issue.

**Effect:** Use of a definition other than the TDA definition puts the City out of compliance with the TDA.

**Recommendation:** Use the TDA definition in calculating FTE for reporting to the State Controller.

**Recommended Action(s):** This recommendation is carried forward from the prior two triennial performance audits. Use payroll records to document the total amount of time spent on transit by all employees, and use that figure (divided by 2,000) to calculate FTE for reporting to the State Controller. This should include drivers and dispatchers as well as those who provide customer service, maintenance, reporting, grant preparation, administration, etc. If payroll data is not available, then the number of hours can be estimated based on the percentage of a position that is dedicated to transit.

**Timeline:** FY 2018/19.

**Anticipated Cost:** Negligible.

---

**Compliance Finding 1:** In FY 2017/18, the City did not meet the 10 percent TDA farebox recovery ratio requirement.

**Criteria:** PUC 99258.4 requires rural transit operators to maintain a farebox recovery ratio of at least 10 percent.

**Condition:** In FY 2017/18, the State Controller Report determined the City’s farebox recovery ratio to be 9.65 percent. (The FY 2017/18 TDA fiscal audit was not provided for review.) This is likely due to a significant increase in operating cost in FY 2017/18.

**Cause:** In prior years during this audit period, the City applied local supplementation to the farebox recovery ratio, resulting in compliance with the TDA.

---

Effect: Failure to provide the FY 2017/18 TDA fiscal audit in a timely manner (which may include local supplementation) demonstrates a farebox recovery ratio lower than 10 percent, which is out of compliance with the TDA.

Recommendation: Identify strategies to bring the farebox recovery ratio above 10 percent.

Recommended Action(s): The City should identify strategies to raise the farebox recovery ratio, either by reducing operating cost, increasing fare revenue, or identifying sources of local supplementation.

Timeline: FY 2018/19.

Anticipated Cost: Negligible.

Functional Finding 1: The City does not maintain sufficient staffing to ensure full coverage and capacity every service day.

Criteria: Scheduling, Dispatch, and Operations is one functional area reviewed as part of the Triennial Performance Audit. The lack of cover drivers (or additional staff capable of filling in for an absent driver) has a negative impact on the effective functioning of the transit program.

Condition: Currently, a driver absence (whether due to illness or vacation) results in service capacity being reduced by half (going from two vehicles to one vehicle). This affects trip availability on days when one driver is unavailable.

Cause: The limited number of drivers means the level of service is determined by driver availability.

Effect: Without staff to fill in for absent drivers, the level of service can be inconsistent from day to day.

Recommendation: Increase or revise staffing to ensure full service coverage.

Recommended Action(s): This recommendation is carried forward from the prior audit. The City should identify strategies to supply an additional driver that can be called upon to substitute for one of the regular drivers and provide additional capacity if warranted. One option is to hire a part-time driver. Another option is to train and license an existing employee who would have the flexibility to drive when one of the regular drivers is absent. The transit fund would only have to cover that employee’s hours on an as-needed basis, but the individual’s regular staff position would need to be flexible enough to provide coverage as needed.


Anticipated Cost: Varies depending on strategy and number of hours required.

Criteria: This recommendation is carried forward from the prior two audits.

Condition: Given that the City’s transit operations are conducted with fewer staff positions than when the DAR manual was created in 2008, the auditors in 2013 and 2016 recommended the City update its resource manual for DAR employees. The update should include updated roles, responsibilities, and protocols reflective of current staffing levels. The City continues to utilize the 2008 manual.

Cause: Often the updating of policy documents has low priority, since their preparation frequently does not impact typical day-to-day operation of the transit program.

Effect: Out-of-date policy documents are not effective in offering guidance for the transit program, especially when there have been significant staffing changes.


Recommended Action(s): The City should update its Dial-A-Ride Service Policy and Procedures Manual to reflect current organizational structure and staffing, as well as any changes to the service delivery policies and procedures.


Anticipated Cost: Modest.