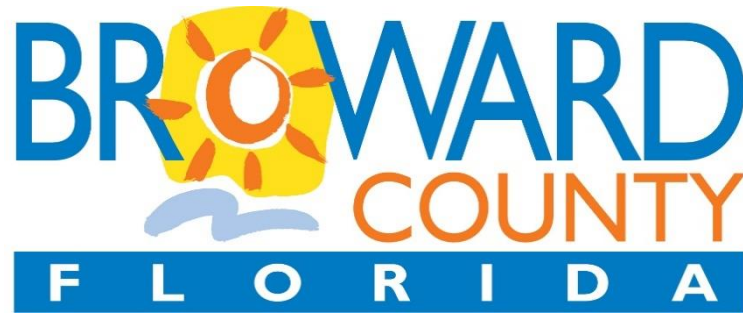




Audit of Transportation Department's Community Shuttle Program

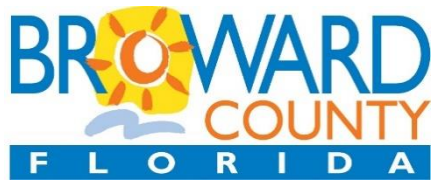
Office of the County Auditor Audit Report

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Report No. 22-14
August 24, 2022



OFFICE OF THE COUNTY AUDITOR

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August 24, 2022

Honorable Mayor and Board of County Commissioners:

We conducted an audit of the Transportation Department's Community Shuttle Program, supported by Transportation Surtax Funding.

The objectives of our audit were to determine whether participating municipalities are in compliance with the interlocal agreements; to determine the adequacy of fiscal controls and oversight and whether resources are appropriately used; and to determine whether funding sources are appropriately applied and reported.

We conclude that participating municipalities are in compliance with the Interlocal Agreements, fiscal controls and oversight are adequate, resources are used appropriately, and funding sources are appropriately applied and reported. Opportunities for Improvement are included in the report.

We conducted this audit in accordance with Generally Accepted Government Auditing Standards. Those standards require that we plan and perform the audit to obtain sufficient and appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

We appreciate the cooperation and assistance provided by Broward County Transportation Department throughout our audit process.

Respectfully submitted,

A handwritten signature in blue ink that reads "Bob Melton".

Bob Melton
County Auditor

cc: Monica Cepero, County Administrator
Andrew Meyers, County Attorney
Kevin Kelleher, Assistant County Administrator
Tim Garling, Deputy General Manager, Transportation Department

Broward County Board of County Commissioners

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INTRODUCTION

The Office of the County Auditor conducts audits of Broward County's entities, programs, activities, and contractors to provide the Board of County Commissioners, Broward County's residents, County management, and other stakeholders unbiased, timely, and relevant information for use in promoting government accountability and stewardship and improving government operations.

We conducted an audit of the Transportation Department's Community Shuttle Program. The objectives of our audit were to determine whether:

1. Participating municipalities are in compliance with the Interlocal Agreements (ILAs).
2. Fiscal controls and oversight are adequate, and resources are used appropriately.
3. Funding sources are appropriately applied and reported.
4. Any Opportunities for Improvement exist.

To determine whether participating municipalities are in compliance with the ILAs, we reviewed the terms of ILAs and records pertaining to passenger service requirements, vehicle utilization, performance measures, transit routes, subcontract provisions, timeliness of shuttles, driver safety, and vehicle maintenance.

To determine whether fiscal oversight and controls are adequate, and resources are used appropriately, we reviewed hourly rates paid to municipalities and the quarterly invoices.

To determine whether funding sources are appropriately applied and reported, we reviewed the funding sources recorded in the County's financial accounting system.

We conducted this audit in accordance with Generally Accepted Government Auditing Standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Our audit included such tests of records and other auditing procedures deemed necessary. The audit period was October 1, 2018, to March 31, 2021, with additional procedures performed

through December 31, 2021; however, transactions, processes, and situations audited were not limited by the audit period.

Overall Conclusion

We conclude that participating municipalities are operating in compliance with the Interlocal Agreements, fiscal controls and oversight are adequate, resources are used appropriately, and funding sources are appropriately applied and reported. Opportunities for Improvement are included in the report.

Background

Established in 1991, the Broward County Transportation Department's Community Shuttle Program (CSP) is a collaborative transit service that currently operates in partnership with 17 County municipalities. These community shuttle service partnerships allow buses to serve as a regional bus network, operating cross-county on major thoroughfares, while the municipalities' community shuttles circulate in the neighborhoods and connect/intersect with BCT's fixed-route buses.

The partnerships are defined by individual Interlocal Agreements (ILAs) between the County and each of the participating municipalities. The current ILAs initiated October 1, 2019, for a two-year term plus two one-year renewal options.

Operations

Shuttle routes are designed to complement the County's Fixed Route system and to provide increased mobility and connectivity options in areas within the local community that larger buses are unable to serve. The municipalities are responsible for the overall planning of the service, including shuttle stop locations. Assisted by BCT staff, municipalities determine the major origins and destinations to be served by each route.



Modifications to routes are allowed; however, implementation of changes must coincide with the schedule established by the County for Fixed Route service. BCT staff calculate travel times used for the development of shuttle schedules. BCT also provides shuttle operator training, printed shuttle schedules, and shuttle stop signs to the municipalities. **Figure 1** shows the

municipalities currently participating in the CSP through the ILAs and the number of routes operated by each municipality.

**Figure 1 – Community Shuttle Program
Participating Municipalities**

Municipality	Routes
City of Coconut Creek	2
City of Coral Springs	2
City of Dania Beach	2
Town of Davie	3
City of Deerfield Beach	2
City of Fort Lauderdale	5
City of Hallandale Beach	4
Town of Hillsboro Beach	1
City of Lauderdale Lakes	2
Town of Lauderdale-by-the-Sea	1
City of Lauderhill	7
City of Lighthouse Point	1
City of Margate	4
City of Miramar	4
City of Pembroke Pines	5
City of Pompano Beach	4
City of Tamarac	2
Total Routes	51

Source: Prepared by Office of the County Auditor using data obtained from BCT and ILAs

As a performance standard, participating municipalities are required to maintain a minimum average of 7.1 Passengers Per Revenue Service Hour (time when the shuttle is operating and available to passengers) per route during any rolling twelve (12) month period. Municipalities must provide monthly passenger boarding, or “ridership reports”, to BCT.

In total, for all participating municipalities, passenger boardings were 1,380,587 in fiscal year 2020 and 951,844 in fiscal year 2021.

Funding

The ILAs provide for operational and maintenance funding, which is paid by the County to each participating municipality. Payments are based on hourly rates established within each ILA and the number of hours that the community shuttles operate. **Figure 2** shows total annual funding

amounts paid by the County to the municipalities for the community shuttle service for the past two completed fiscal years.

Figure 2: Payments* to Municipalities for Fiscal Years 2020 and 2021

Municipality	2020	2021
City of Fort Lauderdale**	\$ 849,311	\$ 500,127
City of Hallandale Beach	771,194	808,485
City of Pembroke Pines**	767,143	450,532
City of Miramar	709,597	431,416
City of Lauderhill	689,102	856,215
City of Coconut Creek	649,733	770,048
Town of Davie	575,474	564,625
City of Coral Springs	329,820	329,320
City of Pompano Beach	332,755	430,718
City of Margate	310,495	342,407
City of Dania Beach	220,266	232,015
City of Deerfield Beach	214,949	259,921
City of Lauderdale Lakes	196,415	226,440
City of Tamarac	156,824	228,302
Town of Lauderdale by the Sea	109,155	100,742
Town of Hillsboro Beach	72,874	71,602
City of Lighthouse Point	41,782	47,995
City of West Park	35,178	-
Total	\$ 7,032,067	\$ 6,650,910

Source: Prepared by Office of County Auditor using data obtained from PeopleSoft

* Payments include year-end accruals (estimates) to reflect amounts due to the municipalities at year-end but not yet disbursed.

**Transportation Department records do not reflect 4th quarter payments or accruals for City of Ft. Lauderdale and City of Pembroke Pines for fiscal year 2021.

Prior to fiscal year 2020 and commencement of the current ILAs, the County used General Transportation Department funding to pay a portion of each participating municipality's CSP operational and maintenance costs, paying each participating municipality \$15 per hour of operation of each community shuttle. Each municipality was responsible for funding the balance. Beginning in fiscal year 2020, with the support of County Transportation Surtax Revenue, County payments were intended to cover 100% of each participating municipality's operational and maintenance costs pertaining to the CSP. City Transportation Surtax Revenues fund any further service expansions.

In addition to payments for operations and maintenance, BCT provides propane-fueled vehicles equipped with devices to secure wheelchairs and bicycle racks to the municipalities. Should any

of the municipalities choose to utilize and purchase non-propane-fueled vehicles, the County will reimburse the municipalities on a per-vehicle basis, up to the County's current purchase price of a propane-fueled vehicle (less the propane conversion) or similar type vehicle from the Florida state contract.

OPPORTUNITIES FOR IMPROVEMENT

Our audit disclosed certain policies, procedures and practices that could be improved. Our audit was neither designed nor intended to be a detailed study of every relevant system, procedure, or transaction. Accordingly, the Opportunities for Improvement presented in this report may not be all-inclusive of areas where improvement may be needed.

1. A Disparate Cost of Operations and Performance Among the Municipalities Indicates a Need for Further Review of the Program Business Model and Practices.

We analyzed various ILAs that established hourly rates paid by the County to the municipalities as well as the calculated cost per passenger. As shown in **Figure 3**, there is a significant disparity in the hourly rate paid by the County to each of the municipalities as well as the calculated cost per passenger. We choose the six-month period of October 1, 2019, through March 31, 2020, for the analysis in order to mitigate any ridership outlier effects of the COVID pandemic.

Figure 3 – Hourly Rates and Cost Per Passenger by Municipality
October 1, 2019 through March 31, 2020

Municipality	Provider	Hourly Rate	Cost Per Passenger
Coconut Creek	In-House	52.48	8.58
Miramar	In-House	65.41	7.33
Coral Springs	Outsourced	49.95	6.28
Deerfield Beach	In-House	58.20	6.18
Hillsboro Beach	Outsourced	53.00	6.06
Dania Beach	Outsourced	42.00	5.89
Tamarac	In-House	57.87	5.28
Lauderdale by the Sea	Outsourced	44.00	5.21
Fort Lauderdale	Outsourced	49.97	5.18
Lighthouse Point	In-House	30.14	4.96
Pembroke Pines	In-House	36.87	4.10
Pompano Beach	Outsourced	41.10	4.10
Hallandale Beach	Outsourced	46.94	3.73
Davie	Outsourced	42.00	3.58
Margate	Outsourced	42.00	3.24
Lauderdale Lakes	Outsourced	44.00	2.14
Lauderhill	Outsourced	35.20	1.52
Average		\$46.54	\$4.90

Source: Office of the County Auditor analysis of Interlocal Agreement Rates and municipality reported passenger counts and billings.

Note: The weighted average cost per passenger, calculated by dividing total billings for all municipalities by total passengers for all municipalities, is \$3.95.

The hourly rates paid to municipality vary substantially, not only across those that perform the services 'in-house' vs. outsourced providers, but even among municipalities that contract with the same provider. Every municipality that outsources their CSP program uses the same provider, Limousines of South Florida. The cost per passenger is calculated by the total amount paid to municipalities divided by the number of passengers. The total paid to municipalities is the hourly rate paid by the County to the municipalities times the number of hours that community shuttles operate. It is noted that the municipality with the highest cost per passenger is over four times the cost of the municipality with the lowest cost per passenger.

It should be noted that this analysis is not intended to compare the CSP to the County's Fixed Route system or suggest that CSP routes should operate at the same ridership and cost efficiency of the County's Fixed Route system. The CSP is a needed program with routes that are designed to complement the County's Fixed Route system and to provide increased mobility and

connectivity options in areas within the local community that larger buses are unable to serve. However, the data is an important metric that can identify areas of potential inefficiency and program alternatives.

The County establishes individual hourly rates for cost reimbursement with each municipality prior to execution of the ILAs. For municipalities that provide services using 'in-house' (using municipality employed drivers and other municipality performed services such as maintenance), the rate is based on actual cost information provided by the municipality. For municipalities that subcontract the services, the rate is based on the actual rate that the municipality pays to their subcontractor. Theoretically, the cost per hour of operating a community shuttle should be relatively constant notwithstanding certain factors such as 'deadhead' (the time and distance from the community shuttle must travel before beginning its route) and maintenance (varies based on the age and make/model of the community shuttle among each municipality).

County performance measures do not require reporting of key information such as cost per passenger for the Community Shuttle Program (CSP). There are only two performance measures for the CSP reported by the Broward County Office of Management and Budget: Number of Community Shuttle Passenger Trips (ridership) and ridership per community shuttle revenue hour. In addition to being limited, these metrics are not compared among providers. Performance Measurements are key elements for managing an organization and should include key information such as cost per passenger. Because municipalities are reimbursed at their full operating cost, there should be appropriate efficiency measures to show the relationship between the work performed and the resources required to perform the work.

According to Transportation Department (Transportation) staff, costs per hour vary for several reasons. For example, there may be differences in each program's deadhead time (the time and distance the community shuttle must travel empty/not in service before and after its route). Transportation staff specifically cited the Town of Hillsboro, which has a high amount of deadhead time because the vendor's bus depot is located a long distance from the town. Therefore, the rate paid between the town and the vendor, which is also the rate paid between the County and the town, reflects this additional cost. In addition, all municipalities except City of Coral Springs and City of Pompano, use vehicles provided by the County. These two municipalities use their vendors' vehicles, and that cost is also reflected in the hourly rates paid. Transportation staff also noted that the City of Lauderhill, which is paid the lowest rate, is subsidizing part of the total costs. Specifically, the County pays Lauderhill the hourly rate of \$35.20 but Lauderhill pays their subcontractor an hourly rate of \$40.00.

Other factors may also impact the disparate hourly rates paid to municipalities. This includes variances caused by the decentralized nature of each municipality individually bidding and

negotiating their subcontractor hourly rates as well as discrepancies in establishing hourly rates for the municipalities that operate in-house as discussed further in Opportunity for Improvement No. 2. A significant factor impacting cost per passengers may also be the efficiency and level of attention in route design. Route designs directly impact the number of hours and number of passengers, both of which drive the cost per passenger.

In totality, disparate costs among municipalities may be indicative of needed improvements in the CSP business model and practices. If costs are not adequately monitored and addressed, opportunities for improvement may be missed. Additionally, the current model of full cost reimbursement disincentivizes municipalities from identifying needed improvements as they are not at risk for the cost of inefficient operations.

We recommend management:

- A. Establish, compare, monitor, and require reporting of meaningful metrics. These should, at a minimum, include analysis of applicable cost and ridership data such as hourly rates paid to municipalities, total costs paid to municipalities, number of hours operated, and cost per passenger. The metrics should be monitored and reported to the appropriate level of governance such as the Surtax Board.
- B. Evaluate overall CSP business models and practices including:
 - County facilitation, standardization, and/or centralization of components such as competitive bidding practices for subcontracted shuttle services.
 - Analysis of budgeted and actual costs of municipalities that operate in-house.
 - Continued monitoring of passenger per revenue hour (PPRH) requirements and corrective actions as applicable.

2. Improvements are Needed in Establishing Hourly Rates of Reimbursement to Ensure Municipalities are Appropriately Reimbursed for Actual Cost of Service.

We identified the following concerns over the establishment of hourly rates:

- A. Municipalities' hourly billing rates are based on outdated three-year old cost data. Specifically, the ILAs began in fiscal year 2020; however, the billing rates were established based upon fiscal year 2017 cost information reported by the municipalities divided by the projected annual hours of operation during the term of the ILA. This methodology does not result in an accurate reflection of costs since employee wages and other cost drivers change annually.

As a result, Transportation is not accurately reimbursing the total costs for operations and maintenance for municipalities that operate in-house. To evaluate differences between the 2017 actual costs, which were used to calculate the ILA hourly reimbursement rate commencing in 2020, and the 2020 actual costs, we compared cost data reported by the municipalities. As shown in **Figure 4**, there were significant differences between 2017 and 2020 costs for four of the six municipalities that operate in-house.

Figure 4 –Municipality Reported Costs

Municipality	Reported Costs		
	2017	2020	Difference
Lighthouse Point	\$44,245	\$43,476	(\$769)
Pembroke Pines	648,925	645,476	(3,449)
Coconut Creek	700,679	902,492	201,813
Tamarac	223,423	281,225	57,802
Deerfield Beach	594,630	254,668	(339,962)
Miramar	921,244	826,254	(94,990)

Source: Office of County Auditor analysis of reported cost data.

Hourly billing rates should be established based on relevant cost data. A more accurate and standard methodology for establishing billing rates would have been an annual process, whereby budgeted or forecasted costs divided by the projected hours of operation. This allows for more timely calculations as it alleviates the need to wait for historical actual cost data to be compiled and finalized. To ensure reasonableness and accuracy, the budgeted or forecasted costs can be compared to historical cost data. Year-end "true-ups" to actual cost data, once finalized, should also be performed.

Adequate procedures are not in place for establishing hourly rates. The ILA also does not address how hourly rates are to be calculated. ILA Section 6.1 states that "the County

agrees to pay City's costs for operations and maintenance ("O&M") of Community Shuttle Service that is actually performed by City at the established O&M rate for Total Vehicle Hours". Although this provision addresses actual service (hours), it does not adequately address actual costs.

- B. Hourly rates established in ILAs for two municipalities providing in-house CSP services were not adequately supported by Transportation records. Staff did not provide requested schedules or other calculation records showing how the hourly rates were established. According to Transportation staff, these were prepared by former staff and not retained. Staff did provide source documentation of municipality cost and operating hour inputs; however, Transportation staff could not provide documentation showing how each rate was calculated. We attempted to recalculate the hourly rates based on explanations and supporting documentation provided by Transportation, but the hourly rate paid to two of the six municipalities that operate in house could not be reasonably recalculated based on the information that Transportation provided. For Pembroke Pines, we recalculated hourly rates ranging from \$32.19 to \$33.82, which are 13% and 8%, respectively, below the ILA rate of \$36.87. For Miramar, we calculated hourly rates ranging from \$72.12 and \$80.87, which are 10% and 24%, respectively, above the ILA rate of \$65.41. As a result, Transportation may not be accurately reimbursing the total costs for operations and maintenance for the two municipalities for fiscal year 2020.

Transportation should maintain documentation showing how contractual hourly rates are determined. ILA Section 6.2.4 states that "City shall provide sufficient detail regarding the factors included in its reported hourly rates and County reserves the right to audit this rate". Without a clear methodology, discrepancies in setting hourly rates may occur.

We recommend management:

- A. Instead of using three-year old cost data, use the municipality's proposed cost budget for the next fiscal year to calculate hourly reimbursement rate for next year and perform a subsequent "true-up" to match the municipalities' actual cost in providing the shuttle services.
- B. Maintain records of calculations for established hourly rates.

3. Future Efforts are Needed to Ensure Routes are Adequately Utilized.

Passenger per Revenue Hour (PPRH) requirements of 7.1 were not met for all routes and Transportation has not initiated contractually available options for enforcement/termination of services. PPRH is an important performance metric because it indicates the efficiency of routes and identifies those routes in need of attention. For the 12-months ended March 31, 2020, 10 out of 51 routes (19.6%) did not meet the average monthly minimum requirement of 7.1 passenger per revenue hour (PPRH) service requirement as shown in **Figure 5**.

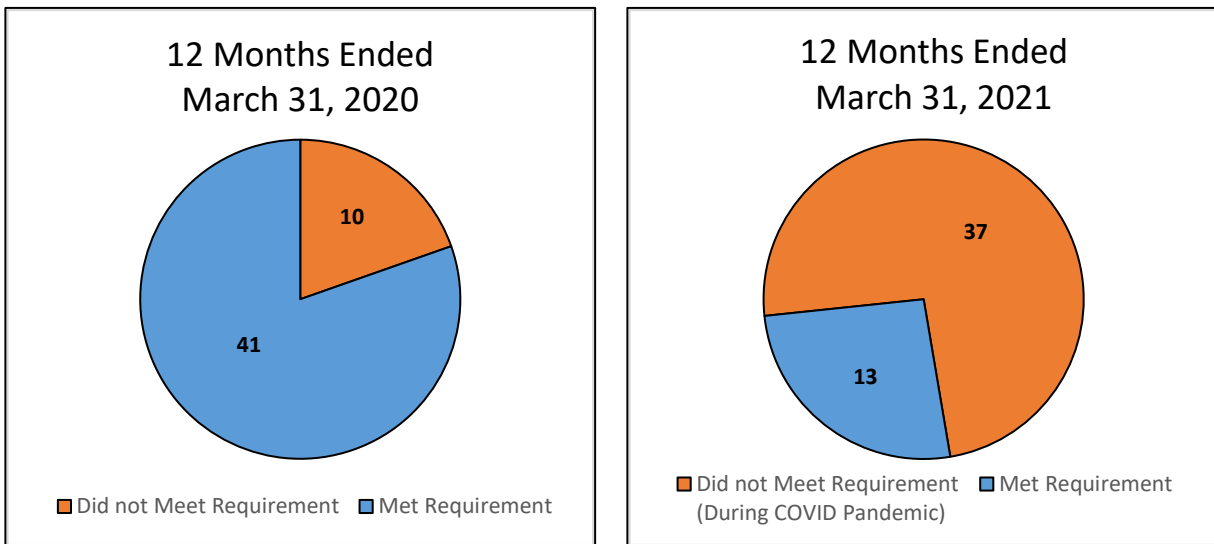
**Figure 5 - Routes Below 7.1 PPRH
12 Months Ended March 31, 2020**

Route Name	PPRH
West Park	4.6
Coconut Creek North	5.0
Dania Beach Green	5.9
Davie Green	5.9
Margate A - Saturday	6.3
Miramar Yellow	6.4
Hillsboro Beach	6.8
Pembroke Pines Green	6.9
Pompano Beach Orange	6.9
Coconut Creek South	7.0

Source: Office of County Auditor analysis of
data provided by the Transportation
Division

For the 12-months ended March 31, 2021, 37 out of 50 routes (74.0%) did not meet the average monthly minimum requirement of 7.1 PPRH requirement due to the COVID pandemic. Because of the large number of impacted routes, instead of presenting a listing of routes, **Figure 6** shows a comparison of the number of total routes meeting the 7.1 PPRH requirement for the 12 months ended March 31, 2020, and 2021.

Figure 6 – Routes Meeting the 7.1 PPRH Requirement



Source: Office of County Auditor analysis from data provided by the Transportation Division

According to Transportation management, the PPRH requirements were tracked and monitored prior to (under the previous ILAs) and since inception of the ILAs but Transportation's enforcement efforts were minimized first in consideration of the recent implementation of the new ILAs and then due to the COVID pandemic. Specifically, the current ILAs were effective October 1, 2019. Although it was noted PPRH requirements were not being met, enforcement actions were not initiated by Transportation to allow municipalities time to normalize operations under the new ILA, and to foster goodwill among the participants. Then, within six months into the new agreement, the COVID pandemic began, which had significant impacts upon community shuttle operations, often facing drastic reductions in service levels and passenger counts due to necessary health precautions and other factors. As a result of these considerations, Transportation reports that they have continued to delay enactment of available enforcement actions per the terms of the ILA.

Section 2.8 of the ILA states that each "City shall maintain a minimum average of 7.1 Passengers per Revenue Service Hour (PPRH) per route during any rolling twelve (12) month period operated by City. City shall monitor trends relating to any reductions in PPRH and shall promptly notify County of possible conditions or remedies that are needed to address the reductions in passengers. It is understood and agreed between County and City that City's failure to maintain a minimum average of 7.1 PPRH per Route during any rolling twelve (12) month period shall constitute a breach of this Agreement, entitling County to terminate this Agreement and shall entitle County to pursue any and all other remedies provided under this Agreement and any remedies available to County at law or in equity."

While the business decision to not take enforcement actions during this period is recognized, it is also noted that prolonged and future operation of underperforming routes and lack of enforcement will result in continued inefficient use of resources and missed opportunities to identify the best service offerings (i.e., most efficient routes) to serve to the largest numbers of residents in need.

We recommend management:

- A. Formalize an internal policy identifying maximum timeframes to notify municipalities of non-compliance.
- B. Evaluate whether interim actions are appropriate such as temporary route changes or reductions for significantly underperforming routes.

4. Improvements are Needed for Maintenance of Driver Records and Background Checks.

We identified the following concerns over maintenance of driver records and requirements for background checks:

- A. To ensure the safety of the public, ILAs require municipalities to submit to Transportation verification of criminal background screenings. We requested Transportation provide information on 13 CSP drivers from seven municipalities and found that:
 - Criminal background checks for three out of 13 selected drivers were generated after the date of our request and years after the employees' hire dates. We did not receive requested documentation of evidence that an earlier background check was performed.
 - Transportation reviews criminal background checks annually rather than at the time of hire.

ILA Section 2.15.3 states "City shall provide current copies of the following records of all employees that operate the Vehicle(s) to County's Safety Manager or the Contract Administrator. The records shall be provided at the time of hire and upon any change in status relating to any information set forth in the below listed record(s)... [which include] Background Verification Record; [and] Criminal Background information."

According to Transportation Management, an annual inspection process is conducted whereby Transportation staff review criminal background information on-site for any new

hires at each participating municipality. Transportation Management, therefore, represented that all records would have been reviewed despite not being currently available.

Failure to obtain and retain required criminal background information at the time of hire could result in unqualified individuals employed as shuttle drivers, compromised safety of passenger and public, and improper handling of equipment.

- B. Due to lack of specificity in the ILA, sources and completeness of driver background checks varied substantially across municipalities. Based on a sample of 13 drivers, the sources for the required background checks ranged from private companies and government agencies. Screening processes were found to be inconsistent and in seven instances we were unable to confirm if sexual offender status was checked.

The ILA lacks specificity as to the required sources and coverage of criminal background checks. ILA Section 2.15.1 states "City shall obtain driving records from the Florida Department of Highway Safety and Motor Vehicles and shall obtain criminal background checks from the Florida Department of Law Enforcement for all Vehicle operators. Such records may also be obtained from other sources approved by the Contract Administrator". None of the sources were from the Florida Department of Law Enforcement. According to the Contract Administrator, other sources were deemed allowable but no internal documentation such as an internal policy and procedure or email to the municipalities was provided supporting this determination.

Clear and specific requirements for background checks is necessary to ensure the qualifications of drivers and ensure the safety of the passengers, public, and equipment. These requirements should specify items such as:

- allowable sources such as Florida Department of Law Enforcement and under what circumstances, if any, that deviations are permitted
- required level criminal background checks including extent of requirements for sexual offender checks and whether background checks need to be statewide or nationwide
- frequency of screenings, such as how often during the course of employment that the background check should be reperformed.

We reviewed other County agreements and identified the following requirements as examples:

- License And Concession Agreement Between Broward County and Florida Renaissance Festival, Inc. for Florida Renaissance Festival at Quiet Waters Park
 - "...shall not permit any person who is listed as a sexual predator or sexual offender on the Florida Department of Law Enforcement, Sexual Offenders and Predators Website or the United States Department of Justice, National Sex Offender Public Website, to provide any services..."
 - "[employees] subject to the criminal background screening under this Agreement shall be rescreened annually based on the date of initial screening..."
- Agreement Between Broward County and Super Nice STS, Inc. d/b/a Transportation America for Paratransit Transportation Services
 - "Criminal background screenings shall include, but not shall not be limited to, employment history checks and statewide criminal correspondence checks through the Department of Law Enforcement, and a check of the Dru Sjodin National Sex Offender Public Website and may include local criminal records checks through local law enforcement agencies."
 - "TRANSPORTATION AMERICA shall conduct these background screenings at least once every six (6) months."

We recommend management:

- A. Develop and maintain a tracking system to ensure all necessary criminal background checks have been reviewed at the time of hire as well as monitored for any expiration dates and resubmission of updated information, as applicable.
- B. Strengthen ILA provisions to specify required elements to be included in background checks.

5. Vehicle Maintenance Reporting and Monitoring Need Improvement.

Transportation does not have an efficient and effective process for proactive reporting and monitoring vehicle maintenance by municipalities who are operating County- owned equipment in their programs. Under the ILA, the County provides vehicles to participating municipalities who are responsible for performing all scheduled maintenance and repair services. Although maintenance records are maintained and can be accessed within a tracking system, Asset Works,

it does not provide a clear indication or reporting of whether vehicle maintenance requirements have been met. For example, when viewing records for a specific vehicle, the system does not readily show when oil changes and other services are performed relative to recommended maintenance schedules. The system appears to only be a repository for maintenance records but does not provide adequate reporting of compliance with maintenance requirements. **Figure 7** shows a screenshot of maintenance records from the Asset Works system that shows a listing of workorders performed for maintenance and repairs:

Figure 7 – Screenshot of Maintenance Records from the Asset Works System

VEHICLE	VIN	BUS STATUS	WORK ORDER LOCATION	CURRENT MAIN LOCATION	WORK ORDER	JOB TYPE	METER	WORK ORDER DATE
0M1364	1GB6G5BL1C1202634	Sold	VEHICLE SERVICE LSF		CB0050-2019-462	REPAIR	202,416	03/03/2019
0M1364	1GB6G5BL1C1202634	Sold	VEHICLE SERVICE LSF		CB0050-2019-462	REPAIR	202,416	03/03/2019
0M1364	1GB6G5BL1C1202634	Sold	VEHICLE SERVICE LSF		CB0050-2019-461	REPAIR	202,416	03/04/2019
0M1364	1GB6G5BL1C1202634	Sold	VEHICLE SERVICE LSF		CB0050-2019-461	REPAIR	202,416	03/04/2019

Source: Transportation Asset Works System

To determine whether maintenance requirements were met, supporting workorder and invoice documentation for each line item would need to be pulled and analyzed. Transportation staff were unable to provide any further reporting of whether vehicle maintenance requirements were met. There was no indication whether BCT personnel are monitoring and reviewing these invoices and work order inputs to ensure municipality compliance with maintenance requirements or if the system provides notification of required maintenance. Transportation Management acknowledged the issue and stated that the system provides effective monitoring notification for Transportation vehicles, but it has more limited functionality for the CSP vehicles because municipalities use different systems that do not readily interface with Asset Works. Transportation Management is exploring other methods of monitoring CSP vehicle maintenance requirements.

Vehicles should be properly maintained to ensure longevity and safe operation. Such requirements are evidenced by policies enacted by the Broward County Fleet Services Division. Broward County Administrative Code, Section 15.8. states "the Fleet Services Division shall:

- Develop and implement a comprehensive mobile equipment and fleet maintenance and management program.

- Evaluate mobile equipment and fleet activities to ensure effective and efficient operations.”

The CSP ILA Section 2.13.8.b. states that “City shall Comply with all Community Shuttle Service operations, and equipment and maintenance requirements established by BCT.”

Proper monitoring of maintenance requirements by County Transportation is particularly important for the CSP. Although the municipalities are responsible for maintaining the community shuttles, the County is financially responsible for funding and purchasing most of the community shuttle fleet. Therefore, the liability and financial consequence of inadequately maintained vehicles is borne by the County. As a result, the County should take particular interest in ensuring that the municipalities meet vehicle maintenance requirements.

Without effective monitoring and review of vehicle maintenance records, County assets may not be adequately maintained in compliance with the ILAs.

We recommend management:

- A. Review current supporting documentation to determine whether vehicle maintenance requirements are being met.
- B. Develop and monitor maintenance reports that clearly show whether vehicle maintenance requirements are met. Such reports should be generated and reviewed by Transportation management on a periodic basis to ensure municipalities follow vehicle maintenance schedules and maintain compliance with the ILA's.

6. Appropriate Measures Should be Taken to Ensure Accurate Reporting of Passenger Counts.

For two out of three routes observed, we identified discrepancies between the number of passengers we counted as entering the shuttle and the number of passengers recorded by the driver on the passenger logs. For the Coral Springs Green Route observed on May 6, 2021, from 11:15 am to 12:30 pm, we noted two instances where a passenger entered the vehicle, but was not recorded on the passenger log, as shown in **Figure 8**.

Figure 8 – Passenger Boardings

Route: Coral Springs Green Route			
Observation Date: May 6, 2021			
Start and End Time: 11:15 am - 12:30 pm			
Log Stop #	Recorded	Observed	Difference
18	0	1	1
19	1	1	0
25	0	1	1
36	1	1	0
37	1	1	0
41	1	1	0
44	1	1	0
1	1	1	0
5	1	1	0
18	1	1	0
Total	8	10	2

Source: Office of the County Auditor summary comparison of staff observations to driver's logs.

For the Coral Springs Blue Route observed on April 29, 2021, at 11:20 am and 12:00 pm to 1:15 pm, we noted one instance where no passenger entered the vehicle, but two entries were recorded on the passenger log as shown in **Figure 9**.

Figure 9 – Passenger Boardings

Route: Coral Springs Blue Route			
Observation Date: April 29, 2021			
Observation Time: 11:20 am*, 12:20 pm to 1:15pm**			
Log Stop #	Recorded	Observed	Difference
13*	2	0	2
13**	1	1	0
16**	3	3	0
30**	1	1	0
2**	1	1	0
5**	1	1	0
Total	9	7	2

Source: Office of the County Auditor summary comparison of staff observations to driver's logs.

We performed a total of three trips – two on Coral Springs routes and one Pembroke Pines route. The purpose of the trips was to perform observations and develop an understanding of CSP. The

trips were not intended to test or extrapolate the results of the observations. Therefore, a larger and random sample may yield different or additional conclusions.

Opportunities may exist for refresher training and / or periodic monitoring and observations to ensure accurate recording of passengers. According to Transportation staff, the manual system in place for recording passenger activity is prone to human error and an automated passenger count system is being explored.

Passenger activity should be accurately recorded and reported to the County and federal government. The information is used by Transportation to monitor compliance with passengers per revenue hour requirements and is reported to the National Transit Database (NTD). Inaccurate passenger recording results in erroneous tallies and miscalculations of data which limits management's ability to properly monitor ridership and performance. This could result in decisions to add or remove routes and other resource allocation decisions based on inaccurate information.

We recommend management:

- A. Ensure accurate recording of data through driver training and periodic unannounced observation of passenger activity.
- B. Evaluate feasibility of other cost-effective methods to record accurate ridership activity.

7. Continued Monitoring and Enhancements Should Occur to Improve Signage, Safety, and Customer Experience.

During our observations of community shuttles in operation, we identified opportunities for improvement for operational effectiveness and customer experience. We performed observations on three routes – two Coral Springs routes and one Pembroke Pines route. The purpose of the observations was to develop an understanding of the CSP from a ridership perspective. The trips were not intended to test or extrapolate the results of the observations. Therefore, a larger and random sample may yield different or additional conclusions. Our observations are as follows:

- A. Some community shuttle stops in the City of Coral Springs do not have signs or markings to clearly demonstrate that the location is a 'stop' associated with the community shuttle service, or the respective stop number on the community shuttle service map. The following pictures show three examples of inadequate signage.

In **Figure 10**, the community shuttle stop number five also services two County fixed bus routes. The sign has markings for the two County fixed bus routes, but there is no indication that this location is also stop 5 for the community shuttle Blue Route.

Figure 10 – Coral Springs, Blue Route Stop 5



Source: Office of the County Auditor observation.

In **Figure 11**, the signage indicates this location is a community shuttle stop but does not inform potential riders that this is the Green Route or the stop number 5.

Figure 11: Coral Springs, Green Route Stop 5



Source: Office of the County Auditor observation.

In **Figure 12**, there is no signage to indicate that this location is Stop 1, the transfer stop, for both the Green and Blue Routes.

Figure 12: Stop 1 for Coral Springs Blue and Green Routes (facing South)



Source: Office of the County Auditor observation.

Although the ILAs do not require municipalities to provide shuttle stop signage, shuttle stops should be clearly marked to indicate the applicable routes serviced, so that potential passengers await the shuttle in the correct locations. In addition, the stop numbers should also be indicated on the physical shuttle stop signage.

A lack of, or inadequate markings, may cause confusion to riders and limit passengers' ability to navigate the transportation system efficiently and effectively. For example, an intersection may have County fixed route bus stops at each corner but only one of the four stops also serves as a community shuttle route. The community shuttle schedule would indicate the intersection where the stop is located but does not specify which of the four corners services the community shuttle route. A first-time passenger on-site with schedule in hand would not be able to clearly and readily identify which corner to board the community shuttle.

- B. The connection point for the Blue and Green Coral Springs routes is located on the soft shoulder of Broken Woods Drive (Stop #1) where there is no designated shuttle stop signage or infrastructure. The Stop does not appear compliant with the Americans with Disabilities Act (ADA). Pictures of this stop are shown in **Figure 12** above and **Figure 13** below.

Figure 13 – Stop 1 for Coral Springs Blue and Green Routes (facing North)



Source: Office of the County Auditor observation.

Figure 14 shows a map of the Coral Springs Blue and Green route and the connection designated as Stop 1.

Figure 14 – Coral Springs Blue and Green Route Connection Stop



Source: Coral Springs route schedule/map brochure.

Red annotations added by Office of the County Auditor.

This stop is indicative of a need for improved planning and oversight of routes. Coral Springs ILA, Section 2.7.1.(1) states the County will review shuttle stops prior to start of service for ADA compliance. If County determines a shuttle stop to be ADA non-compliant, it will be removed and not used until municipality makes stop ADA compliant.

The utilization of this unmarked location as a stop for multiple shuttle routes limits passengers' ability to navigate the transportation system safely as well as efficiently and effectively and may result in passengers being inconvenienced and or injured when awaiting or transferring shuttles, particularly in inclement weather.

- C. During one of our three observations, the driver on the Coral Springs Blue Route picked up a passenger at a non-designated stop area. It is unclear if the driver lacked adequate training or choose to not follow the shuttle safety requirements. ILA, Section 2.7.1. (2) states "Flag Stops, non-designated shuttle stop locations at which a Vehicle stops on signal to allow passengers to board or alight a vehicle, are not acceptable and will not be

used to support Community Shuttle Service.” Passengers may be injured entering or exiting the shuttle at an inappropriate shuttle stop.

- D. Personal items such as groceries and shopping bags are subject to damage or loss. Passengers were observed placing their personal items on the floor at the front of the vehicle where the items are prone to movement causing damage to items, safety hazards, theft and/or general inconvenience. On the Pembroke Pines route observation, many passengers boarded the shuttle with bags of merchandise. The bags were left unsecured on the floor by the driver so that the passengers can make their way to their seating. Accommodations should be made so that personal items are safely retained within appropriate proximity and control of the passenger.

We recommend management:

- A. Implement measures to ensure adequate community shuttle signage on the shuttle stops, including necessary provisions to future ILAs and / or ILA amendments.
- B. Review Coral Springs Blue and Green routes to identify an appropriate connection point between the routes.
- C. Ensure proper driver training and monitoring is provided to ensure passengers pick-ups are compliant with the ILA.
- D. Identify accommodations so that personal items can be safely retained within appropriate proximity and control of the passenger.
- E. Implement continuous monitoring for signage, safety, and customer experience improvements.

MANAGEMENT'S RESPONSE



KEVIN B. KELLEHER, Assistant County Administrator
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MEMORANDUM

TO: Robert Melton, County Auditor

FROM: Kevin Kelleher, Assistant County Administrator 

DATE: August 4, 2022

SUBJECT: **Management Response to County Auditor's Report on Community Shuttle Program at the Broward County Transportation Department Service and Strategic Planning Division**

The Transportation Department (Transportation or BCT) has reviewed the Office of the County Auditor's Report on the Audit of Transit Community Shuttle Program and submits the following as Management's response.

In summary, Management concurs with the Auditor's overall conclusion that participating municipalities are in compliance with the Interlocal Agreements (ILA), controls and fiscal oversight are adequate, resources are used appropriately, and funding sources are appropriately applied and reported. Further, Management acknowledges the Auditor's recommend opportunities for improvement and as provided herein, BCT has already implemented many new procedural enhancements and is working on others.

Below are detailed responses to each of the Auditor's opportunities for improvements and recommendations.

Opportunity for Improvement 1: A Disparate Cost of Operations and Performance Among the Municipalities Indicates a Need for Further Review of the Program Business Model and Practices.

Recommendation A: Establish, compare, monitor, and require reporting of meaningful metrics. These should, at a minimum, include analysis of applicable cost and ridership data such as hourly rate paid to municipalities, total costs paid to municipalities, number of hours operated, and cost per passenger. The metrics should be monitored and reported to the appropriate level of governance such as the Surtax Board.

Broward County Board of County Commissioners
Torey Alston • Mark D. Bogen • Lamar P. Fisher • Beam Furr • Steve Geller • Jared E. Moskowitz • Nan H. Rich • Tim Ryan • Michael Udine
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Response: Management concurs. Currently, BCT collects and reports operational data from the Community Shuttle Program (CSP) on a daily, monthly, quarterly, semi-annual, and annual basis. This includes data such as ridership, hourly rates, vehicle mileage, total costs, missed service, and number of service hours. BCT will further refine these operational metrics and develop a series of fiscal metrics for the CSP. These metrics will then become part of our management reporting for overall program efficiency. The management reports with the new metrics will be implemented by September 30, 2022.

Recommendation B: Evaluate overall CSP business models and practices including:

1. County facilitation, standardization, and/or centralization of components such as competitive bidding practices for subcontracted shuttle services.

Response: Management partially concurs. BCT is reviewing various options to standardize and/or centralize CSP components such as competitive bidding practices for both subcontracted and directly provided services. BCT anticipates that this review will be completed by December 31, 2022.

In addition, it should be noted that BCT already directly purchases buses for the program from the Florida State Contract -Transit Research Inspection Procurement Services (TRIPS) to standardize not only vehicle specifications, but also vehicle costs for the CSP.

Standardizing or centralizing the competitive bidding practices for subcontracted service ultimately impacts the existing arrangements with the municipalities. Currently, 12 of the 18 municipalities subcontract services through competitive bid processes in which BCT reviews the RFPs before they are advertised to ensure there are no conflicts with the Broward County Procurement Code, FDOT Regulations, and FTA Regulations. In addition, some municipalities have requested that BCT staff sit on their Selection Committees (SC) in an advisory capacity, which we have and will continue to do so.

2. Analysis of budgeted and actual costs of municipalities that operate in-house.

Response: Management concurs and has created a new process. Starting with the Fiscal Year 2023 budget cycle, municipalities that directly operate Community Shuttle services will have their CSP budget based on the annual budget adopted by the Board or Commission of each municipality. BCT reserves the right to disapprove annual budgets that are excessive and not in the best interest of the County. BCT will require each municipality to submit a monthly invoice detailing actual eligible expenses. After an expense eligibility review by BCT staff, actual expenses will be reimbursed monthly. This will eliminate the need to "true-up" billing rates and actual costs.

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3. Continued monitoring of passenger per revenue hour (PPRH) requirements and corrective actions as applicable.

Response: *Management concurs and will continue monitoring.* There is ongoing and continuous monitoring of the PPRH requirement for CSP based on the Inter-Local Agreement (ILA) between the County and the municipalities. During the COVID-19 pandemic, the 7.1 PPRH requirement was suspended due to the public health emergency. When the impacts of the COVID-19 pandemic ease, BCT will resume the implementation of corrective actions for municipalities not achieving the 7.1 PPRH requirement.

Opportunity for Improvement 2: Improvements are Needed in Establishing Hourly Rates of Reimbursement to Ensure Municipalities are Appropriately Reimbursed for Actual Cost of Service

Recommendation A: Instead of using three-year old cost data, use the municipality's proposed cost budget for the next fiscal year to calculate hourly reimbursement rate for next year.

Response: *Management concurs and has created a new process.* As discussed above, starting with the Fiscal Year 2023 budget cycle, BCT will change the current process and require all municipalities in the CSP to provide the annual budgets adopted by their respective Board or Commission. BCT will then require each municipality to submit invoices based on actual expenses on a monthly basis. After a review of the submitted information, BCT will then reimburse the municipalities monthly, based on actual expenses.

Recommendation B: Maintain records of calculations for established hourly rates.

Response: *Management concurs and has implemented a new process.* BCT implemented a new process in December 2020 in which all CSP budgets and actual expenses are reviewed by the Transportation Department's Administration Division prior to the finalization of budgets and reimbursements to the municipalities. The need for these calculations and the review process will be eliminated with the Fiscal Year 2023 budget cycle as all municipalities will be required to submit adopted budgets on an annual basis.

Opportunity for Improvement 3: Future Efforts are Needed to Ensure Routes are Adequately Utilized.

Recommendation A: Formalize an internal policy identifying maximum timeframes to notify municipalities of non-compliance.

Response: *Management partially concurs.* As discussed above, per the existing Community Shuttle ILAs, the 7.1 Passenger Per Revenue Hour (PPRH) requirement is

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based on a rolling 12-months. This requirement has been temporarily suspended since the onset of the COVID-19 pandemic due to the public health emergency. BCT continues to monitor the COVID-19 pandemic's effect on ridership and will enforce the rolling 12-month PPRH requirement when conditions improve. It is critical that basic levels of mobility be maintained for the public during this public health emergency. It should be noted that there are 52 routes in the CSP and 92% of them operate at frequencies of 60 minutes or greater. BCT will formally document the status of any temporary suspensions or reductions of the PPRH requirement due to the COVID-19 pandemic.

Recommendation B: Evaluate whether interim actions are appropriate such as temporary route changes or reductions for significantly underperforming routes.

Response: Management partially concurs. As discussed above, the existing Community Shuttle ILA provides a requirement of 7.1 Passengers Per Revenue Hour (PPRH) based on a rolling 12-months. BCT has an existing process in place to work with the municipalities to address the underperformance of routes. This process has been suspended during the COVID-19 pandemic and will be reinstated when the impacts of the pandemic ease.

Opportunity for Improvement 4: Improvements are Needed for Maintenance of Driver Records and Background Checks.

Recommendation A: Obtain and retain copies of required driver records including driving records, criminal background information, and INS Employment Eligibility Form I-9 at the time of hire.

Recommendation B: Develop and maintain a tracking system to ensure all necessary records have been obtained, including monitoring of any expiration dates, and resubmission of updated information, as applicable.

Recommendation C: Strengthen ILA provisions to specify required elements to be included in background checks.

Response: Management concurs and has partially implemented. Effective June 1, 2022, BCT began consistently tracking and updating driver records in a spreadsheet format. This information includes the Motor Vehicle Records; Driver's License status, numbers, and expiration dates; medical certificate status and expiration dates; training dates; criminal background information; and the INS Employment Eligibility Form I-9. An initial email was sent to the municipalities on June 8, 2022, requesting that these documents must be submitted for all new hire and returning drivers. BCT then followed-up with the municipalities on July 12, 2022, requesting that this information be provided for all operators to ensure consistency across the CSP. Municipalities were given until October 1, 2022, to comply and provide proof to BCT that these new driver information requirements have been met. In addition, the municipalities were notified on May 27,

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2022, that a Chauffeurs' License would be required for all current and future bus operators. The requirement for a Chauffeur's License will allow for consistency in-terms of background checks and sexual offender checks. Finally, the Transportation Department's Service and Strategic Planning Division will develop an application by December 31, 2022, that will automate tracking and notifications to the cities of any issues or outstanding items relating to driver records.

Opportunity for Improvement 5: Vehicle Maintenance Reporting and Monitoring Needs Improvement.

Recommendation A: Review current supporting documentation to determine whether vehicle maintenance requirements are being met.

Recommendation B: Develop and monitor maintenance reports that clearly show whether vehicle maintenance requirements are met. Such reports should be generated and reviewed by Transit management on a periodic basis to ensure municipalities' follow vehicle maintenance schedules and maintain compliance with the ILA's.

Response: Management concurs. Per the ILA, all vehicle maintenance, and Preventive Maintenance (PM) records are uploaded into BCT's AssetWorks System. Due to the different maintenance tracking programs used by each municipality, BCT has not been able to take advantage of some of the features in AssetWorks, namely the automatic alerts and reporting when maintenance requirements are not being met. Management concurs that this review of maintenance requirements should be done on a monthly basis for overall program compliance. The Transportation Department's Service and Strategic Planning Division staff will coordinate with the Transit IT Section to develop a process to automatically produce monthly reports that will show mileage and PM status for each vehicle used to support the CSP. The municipalities will be required to enter monthly mileages in AssetWorks, which will allow Transit IT to run reports. BCT staff will also send reminders to the municipalities. This process will be developed and implemented by October 1, 2022. Municipalities that are found to have vehicles that have exceeded the mileage for PM's will receive formal written notice of the deficiency and given 72 hours to perform the required maintenance, provide documented proof to the Contract Administrator, and upload this documentation into AssetWorks.

Opportunity for Improvement 6: Appropriate Measures Should be Taken to Ensure Accurate Reporting of Passenger Counts.

Recommendation A: Ensure accurate recording of data through driver training and periodic unannounced observation of passenger activity.

Response: Management concurs. BCT staff will implement a process that will require a statistically valid sampling of all community shuttle trips to verify reported ridership. This will be done through BCT's General Planning Consultant (GPC). This new process is

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anticipated to be implemented beginning October 1, 2022. In addition, effective August 2, 2022, BCT staff will begin conducting random monthly ride-checks to assist in the validation of reported ridership.

Recommendation B: Evaluate feasibility of other cost-effective methods to record accurate ridership activity.

Response: Management concurs. BCT has a fully funded Automatic Passenger Counter (APC) project that will enter the procurement process within the next 60 days. Once APCs are implemented, ridership will be consistently tracked on a stop level basis with a statistical accuracy of 90+%. BCT plans to have APC's installed on all vehicles and operational in CSP by December 31, 2023.

Opportunity for Improvement 7: Continued Monitoring and Enhancements Should Occur to Improve Signage, Safety, and Customer Experience.

Recommendation A: Implement measures to ensure adequate community shuttle signage on the shuttle stops, including necessary provisions to future ILAs and / or ILA amendments.

Response: Management concurs and has created a new review process. BCT supplies signage to the municipalities per the existing ILA with the understanding that the municipalities install and maintain the shuttle stops. BCT has a Work Authorization in place with the external GPC that will comprehensively review the CSP routes, routing, signage and stops to include assessments for ADA Compliance, location, and placement. Terms and conditions of the ILA require that the municipalities only service stops that are ADA compliant and to ensure that non-compliant ADA stops not be used until they can be made compliant. BCT staff is coordinating with the municipalities to ensure all stops are identified in this review. BCT will coordinate the municipalities to have all signage issues identified and corrected by December 31, 2022. In addition, starting with Fiscal Year 2023, BCT will perform an annual review on each stop in the CSP.

BCT staff will also develop a city-specific GIS stop profile within 60 days, and effective October 1, 2022, BCT will require the municipalities to perform stop audits annually to confirm their stops are in a state of "good repair." This confirmation will then be entered/recorded electronically by the municipality in their respective GIS stop profile and audited by BCT staff. The future ILA's will be amended to reflect this requirement.

Recommendation B: Review Coral Springs Blue and Green routes to identify an appropriate connection point between the routes.

Response: Management concurs. The City of Coral Springs was contacted on June 3, 2022, concerning the route transfer issue, and a review is currently underway. The City and BCT will coordinate and correct this shuttle stop issue by August 31, 2022.

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Recommendation C: Ensure proper driver training and monitoring is provided to ensure passengers pick-ups are compliant with the ILA.

Response: Management concurs and addressed. The City of Coral Springs was notified on June 3, 2022, concerning the route transfer and driver training issue. The City advised that they have addressed this training issue with their subcontractor. BCT staff will perform periodic spot checks to monitor.

Recommendation D: Evaluate the feasibility of providing appropriate areas within the vehicle to store items that passengers cannot safely hold while in transit.

Response: Management does not concur. BCT does not concur with this recommendation, and it is not an industry best practice; particularly on the vehicles used for Community Shuttle service. Loose items tend to cause additional concerns specific to safety as they can become projectiles when not secured and are jostled or shift when the bus is in motion. In addition, it is also a security best practice for passengers remain in control of their belongings.

Recommendation E: Implement continuous monitoring for signage, safety, and customer experience improvements.

Response: Management concurs. As discussed above, BCT will comprehensively review the CSP routes, routing, signage and stops to include assessments for ADA Compliance, location, and placement. BCT anticipates that all signage issues will be identified and corrected by December 31, 2022. In addition, starting in Fiscal Year 2023, BCT will perform an annual review on each stop in the CSP.

BCT staff will also develop a city-specific GIS stop profile within 60 days, and effective October 1, 2022, BCT will require the municipalities to perform stop audits annually to confirm their stops are in a state of "good repair." This confirmation will then be entered/recorded electronically by the municipality in their respective GIS stop profile and audited by BCT staff.

Thank you for the opportunity to respond and provide Management's comments to the Audit. If there are any additions, deletions/omissions, or other changes or modifications to Management's response, please provide us the opportunity to review prior to issuance. Should you have any questions, please do not hesitate to contact me or Deputy General Manager Tim Garling.

Cc: Monica Cepero, County Administrator
Kimm Campbell, Assistant County Administrator
Tim Garling, Deputy General Manager, Transportation Department
Andrew Meyers, County Attorney