

**ORANGE COUNTY TRANSPORTATION AUTHORITY**

Agreed-Upon Procedures Performed  
With Respect to the National Transit Database Report

For the Period  
July 1, 2016 through June 30, 2017



**INDEPENDENT ACCOUNTANTS' REPORT ON  
APPLYING AGREED-UPON PROCEDURES**

Board of Directors  
Orange County Transportation Authority  
Orange, California

The Federal Transit Administration (FTA) has established the following standards with regard to the data reported to it in the Federal Funding Allocation Statistics Form FFA-10 (FFA-10) for the Orange County Transportation Authority (OCTA) annual National Transit Database (NTD) report:

1. A system is in place and maintained for recording data in accordance with NTD definitions. The correct data are being measured and no systematic errors exist.
2. A system is in place to record data on a continuing basis and the data gathering is an ongoing effort.
3. Source documents are available to support the reported data and are maintained for FTA review and audit for a minimum of three years following FTA's receipt of the NTD report. The data are fully documented and securely stored.
4. A system of internal controls is in place to ensure the data collection process is accurate and that the recording system and reported comments are not altered. Documents are reviewed and signed by a supervisor, as required.
5. The data collection methods are those suggested by FTA or meet FTA requirements.
6. The deadhead miles, computed as the difference between the reported total actual vehicle miles data and the reported total actual vehicle revenue miles data, appear to be accurate.
7. Data are consistent with prior reporting periods and other facts known about OCTA's operations.

We have performed the procedures described in Attachment 1 of this report, which were agreed to by OCTA and the FTA and specified in the declarations section of the *2017 Policy Manual*, solely to assist you in evaluating whether OCTA complied with the standards described above and that the information included in the NTD report FFA-10 form for the year ended June 30, 2017, is presented in conformity with the requirements of the *Uniform System of Accounts and Records and Reporting System; Final Rule*, as specified in 49 CFR part 630, *Federal Register*, January 15, 1993 and as presented in the *2017 Policy Manual*. OCTA's management is responsible for OCTA's compliance with those standards and the accuracy of the FFA-10 form. The sufficiency of these procedures is solely the responsibility of OCTA and FTA. Consequently, we make no representation regarding the sufficiency of the procedures described in Attachment 1 either for the purpose for which this report has been requested or for any other purpose.

The procedures and findings described in Attachment 1 of this report, which are referenced in order to correspond to the *2017 Policy Manual* procedures, were applied separately to each of the information systems used to develop the reported vehicle revenue miles (VRM), passenger miles (PM), fixed guideway directional route miles (FG DRM), High Intensity Bus Lanes directional route miles (HIB DRM), and operating expenses of OCTA for the year ended June 30, 2017, and for each of the following modes: (1) Motor Bus - directly operated (MBDO), (2) Commuter Bus – directly operated (CBDO), (3) Motor Bus - purchased transportation (MBPT), (4) Commuter Bus – purchased transportation (CBPT), (5) Demand Response - purchased transportation (DRPT), (6) Demand Response – Taxi – purchased transportation (DTPT) and (7) Vanpool Service - purchased transportation (VPPT).

This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on compliance with the procedures noted in Exhibit 68 of the NTD *2017 Policy Manual* or on the FFA-10. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of OCTA management, OCTA Board of Directors and the FTA and is not intended to be and should not be used by anyone other than these specified parties.



Laguna Hills, California

October 31, 2017

Excerpt from the FTA 2017 Policy Manual Exhibit 68 - Federal Funding Allocation Data Review Suggested Procedures:

FTA has specified and agreed to a set of procedures for the independent auditor to perform to satisfy the requirements of the Federal Funding Allocation data review. Several of the procedures below require the auditor to select a random sample of documents or data. The procedures do not specify the selected number (i.e., the percentage of the total documents/data). The auditor should use professional judgment to determine the percentage that will enable the auditor to make the required assurances.

The source documents and other records (such as data summaries) may be in the form of digital data files. The auditor should ensure that these files are securely stored and that a contingency plan is in place to ensure that the transit agency retains source documents for a minimum of three years.

- a. The procedures to be applied to each applicable mode and type of service (TOS) (directly- operated (DO) and purchased transportation (PT)) are: Obtain and read a copy of written system procedures for reporting and maintaining data in accordance with NTD requirements and definitions set forth in 49 CFR Part 630, Federal Register, dated January 15, 1993, and as presented in the *2017 Policy Manual*. If there are no procedures available, discuss the procedures with the personnel assigned responsibility for supervising the NTD data preparation and maintenance.

*Results - We obtained and read a copy of OCTA's Passenger Counting and Reporting (PCR) procedures. Based on our inquiry, we noted that OCTA maintains procedures in accordance with NTD requirements and definitions set forth in 49 CFR Part 630, Federal Register, January 15, 1993 and as presented in the 2017 Policy Manual.*

- b. Discuss the procedures (written or informal) with the personnel assigned responsibility for supervising the preparation and maintenance of NTD data to determine:
  - The extent to which the transit agency followed the procedures on a continuous basis, and
  - Whether these transit personnel believe such procedures result in accumulation and reporting of data consistent with NTD definitions and requirements set forth in 49 CFR Part 630, Federal Register, dated January 15, 1993, and as presented in the 2017 Policy Manual.

*Results - We inquired regarding OCTA's procedures for the MBDO, MBPT, VPPT, DRPT, DTPT, CBDO and CBPT services noting that the asserted procedures were consistently applied. In addition, based on our inquiry with the Administrative Specialist – Transit Division and the Section Manager – Vanpool Program, management asserted that the procedures resulted in the accumulation and reporting of data consistent with the NTD definitions and requirements set forth in 49 CFR Part 630, Federal Register, January 15, 1993 and as presented in the 2017 Policy Manual.*

- c. Ask these same personnel about the retention policy that the transit agency follows as to source documents supporting NTD data reported on the Federal Funding Allocation Statistics form.

*Results - We inquired with the Business Unit Analyst – Transit Division and the Section Manager – Vanpool Program, regarding OCTA's retention policy for source documents supporting NTD data reported on the Federal Funding Allocation Statistics form. Per inquiry, the current practice is to retain electronic data for seven years.*

- d. Based on a description of the transit agency's procedures from items (A) and (B) above, identify all the source documents that the transit agency must retain for a minimum of three years. For each type of source document, select three months out of the year and determine whether the document exists for each of these periods.

*Results - We inspected the following source documents for each type of service, selected three months out of the year and determined that the documents existed for each of these periods without exception:*

<i>Type of Service</i>	<i>Source Document</i>	<i>Months Tested</i>
<i>MBDO</i>	<ul style="list-style-type: none"> <li>• <i>MBDO Statistics Reports (queried from Data Warehouse)</i></li> <li>• <i>Random Sampling Database</i></li> <li>• <i>Trip Sheets</i></li> <li>• <i>NTD Data Worksheets</i></li> <li>• <i>HASTUS Summaries by Route</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>September 2016, January 2017, and March 2017.</i></li> <li>• <i>Three years of data were noted to be archived on OCTA's network.</i></li> </ul>
<i>CBDO</i>	<ul style="list-style-type: none"> <li>• <i>CBDO Statistics Reports (queried from Data Warehouse)</i></li> <li>• <i>Random Sampling Database</i></li> <li>• <i>Trip Sheets</i></li> <li>• <i>NTD Data Worksheets</i></li> <li>• <i>HASTUS Summaries by Route</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>September 2016, January 2017, and March 2017.</i></li> <li>• <i>Three years of data were noted to be archived on OCTA's network.</i></li> </ul>
<i>MBPT</i>	<ul style="list-style-type: none"> <li>• <i>MBPT Statistics Reports (queried from Data Warehouse)</i></li> <li>• <i>Random Sampling Database</i></li> <li>• <i>Trip Sheets</i></li> <li>• <i>NTD Data Worksheets</i></li> <li>• <i>HASTUS Summaries by Route</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>September 2016, January 2017, and March 2017.</i></li> <li>• <i>Three years of data were noted to be archived on OCTA's network.</i></li> </ul>
<i>CBPT</i>	<ul style="list-style-type: none"> <li>• <i>CBPT Statistics Reports (queried from Data Warehouse)</i></li> <li>• <i>Random Sampling Database</i></li> <li>• <i>Trip Sheets</i></li> <li>• <i>NTD Data Worksheets</i></li> <li>• <i>HASTUS Summaries by Route</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>September 2016, January 2017, and March 2017.</i></li> <li>• <i>Three years of data were noted to be archived on OCTA's network.</i></li> </ul>
<i>DRPT</i>	<ul style="list-style-type: none"> <li>• <i>Contractor Provided NTD Program Data reports</i></li> <li>• <i>Driver Manifests</i></li> <li>• <i>Passenger and Mileage Summaries from Trapeze database</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>September 2016, January 2017, and March 2017.</i></li> <li>• <i>Three years of data were noted to be archived on OCTA's</i></li> </ul>

		<i>network.</i>
<i>DTPT</i>	<ul style="list-style-type: none"> <li>• <i>Contractor Provided NTD Program Data reports</i></li> <li>• <i>Passenger and Mileage Summaries from Trapeze database</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>September 2016, January 2017, and March 2017.</i></li> <li>• <i>Three years of data were noted to be archived on OCTA's network.</i></li> </ul>
<i>VPPT</i>	<ul style="list-style-type: none"> <li>• <i>Detail and Summary Reports from Data Warehouse</i></li> <li>• <i>Rider Log-in Website</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>September 2016, January 2017, and March 2017.</i></li> <li>• <i>Three years of data were noted to be archived on OCTA's network.</i></li> </ul>

- e. Discuss the system of internal controls. Inquire whether separate individuals (independent of the individuals preparing source documents and posting data summaries) review the source documents and data summaries for completeness, accuracy, and reasonableness and how often these individuals perform such reviews.

*Results - We inquired regarding the system of internal controls noting that each respective mode/type of service is being reviewed by personnel independent of the preparation process. The review is performed monthly for all modes with a second review performed quarterly for the MBDO, MBPT, CBDO, CBPT, DRPT and DTPT modes.*

- f. Select a random sample of the source documents and determine whether supervisors' signatures are present as required by the system of internal controls. If supervisors' signatures are not required, inquire how personnel document supervisors' reviews.

*Results - We selected a random sample of 40 Random Check Trip Sheets for the MBDO and MBPT services, 10 Random Check Trip Sheets for the CBDO and CBPT services, and 40 random sample Drivers Manifests for the DRPT service and noted supervisory signatures documenting reviews of the data presented without exception. For DTPT and VPPT, we noted supervisory signatures on the source documents which were in electronic format without exception.*

- g. Obtain the worksheets used to prepare the final data that the transit agency transcribes onto the Federal Funding Allocation Statistics form. Compare the periodic data included on the worksheets to the periodic summaries prepared by the transit agency. Test the arithmetical accuracy of the summaries.

*Results - We obtained the worksheets utilized by OCTA to transcribe statistics to the Federal Funding Allocation Statistics form and compared the data to summaries without exception. We tested the arithmetical accuracy of the summaries without exception.*

- h. Discuss the procedure for accumulating and recording passenger miles traveled (PMT) data in accordance with NTD requirements with transit agency staff. Inquire whether the procedure is one of the methods specifically approved in the 2017 Policy Manual.

*Results - Sampling was conducted for the MBDO, MBPT, CBDO and CBPT modes. We inspected the sampling methodologies and noted that the sampling methodology used met the requirements of the 2017 Policy Manual.*

*The remaining 3 modes of services do not involve sampling. These modes use a 100% count of actual PM and compilations of actual Revenue Miles which is accordance with the 2017 Policy Manual.*

- i. Discuss with transit agency staff (the auditor may wish to list the titles of the persons interviewed) the transit agency's eligibility to conduct statistical sampling for PMT data every third year. Determine whether the transit agency meets NTD criteria that allow transit agencies to conduct statistical samples for accumulating PMT data every third year rather than annually. Specifically:
- According to the 2010 Census, the public transit agency serves an UZA with a population less than 500,000.
  - The public transit agency directly operates fewer than 100 revenue vehicles in all modes in annual maximum revenue service (VOMS) (in any size UZA).
  - Service purchased from a seller is included in the transit agency's NTD report.
  - For transit agencies that meet one of the above criteria, review the NTD documentation for the most recent mandatory sampling year (2017) and determine that statistical sampling was conducted and meets the 95 percent confidence and  $\pm 10$  percent precision requirements.
  - Determine how the transit agency estimated annual PMT for the current report year.

*Results – OCTA did not meet the criteria above. Therefore the procedure identified above is not applicable.*

- j. Obtain a description of the sampling procedure for estimation of PMT data used by the transit agency. Obtain a copy of the transit agency's working papers or methodology used to select the actual sample of runs for recording PMT data. If the transit agency used average trip length, determine that the universe of runs was the sampling frame. Determine that the methodology used to select specific runs from the universe resulted in a random selection of runs. If the transit agency missed a selected sample run, determine that a replacement sample run was random. Determine that the transit agency followed the stated sampling procedure.

*Results – For the MBDO, MBPT, CBDO and CBPT modes we obtained a copy of OCTA's methodology used in the statistical sampling to estimate Passenger Miles Travelled (PMT) and determined that the methodology used by OCTA resulted in a random selection of runs and that the stated sampling procedure was followed in accordance with the National Transit Database Sampling Manual.*

- k. Select a random sample of the source documents for accumulating PMT data and determine that the data are complete (all required data are recorded) and that the computations are accurate. Select a random sample of the accumulation periods and re-compute the accumulations for each of the selected periods. List the accumulations periods that were tested. Test the arithmetical accuracy of the summary.

*Results - For MBDO we randomly selected 40 surveyed routes throughout the year. We verified the mathematical accuracy of the survey count sheets and that the data was properly input to the accumulation worksheet designed to perform the PMT calculation. No exceptions were found as a result of this procedure.*

*For MBPT we randomly selected 40 surveyed routes throughout the year. We verified the mathematical accuracy of the survey count sheets and that the data was properly input to the accumulation worksheet designed to perform the PMT calculation. No exceptions were found as a result of this procedure.*

*For CBDO we randomly selected 10 surveyed routes throughout the year. We verified the mathematical accuracy of the survey count sheets and that the data was properly input to the accumulation worksheet designed to perform the PMT calculation. No exceptions were found as a result of this procedure.*

*For CBPT we randomly selected 10 surveyed routes throughout the year. We verified the mathematical accuracy of the survey count sheets and that the data was properly input to the accumulation worksheet designed to perform the PMT calculation. No exceptions were found as a result of this procedure.*

*For DRPT and DTPT modes, we selected 40 routes performed during September 2016, January 2017 and March 2017 and compared the PMT reported against the signed driver manifests without exception.*

*For VPPT, we compared ridership being entered on the Vanpool internet database for September 2016, January 2017 and March 2017 against amounts uploaded to the Data Warehouse without exception. We also tested the revenue miles reported for 40 Vanpool trips and verified the accuracy of calculations used to determine PMT without exception.*

- l. Discuss the procedures for systematic exclusion of charter, school bus, and other ineligible vehicle miles from the calculation of actual vehicle revenue miles with transit agency staff and determine that they follow the stated procedures. Select a random sample of the source documents used to record charter and school bus mileage and test the arithmetical accuracy of the computations.

*Results - The procedure identified above is not applicable. Per inquiry with OCTA's management, OCTA did not provide charter or school bus services.*

- m. For actual vehicle revenue mile (VRM) data, document the collection and recording methodology and determine that deadhead miles are systematically excluded from the computation. This is accomplished as follows:
  - If actual VRMs are calculated from schedules, document the procedures used to subtract missed trips. Select a random sample of the days that service is operated, and re-compute the daily total of missed trips and missed VRMs. Test the arithmetical accuracy of the summary.

*Results – For the MBDO, CBDO, MBPT and CBPT modes, OCTA calculated missed hours of service rather than missed trips. This resulted in a Total Actual Revenue Vehicle Hours (RVH) by mode as a percentage of Monthly Total Scheduled VRM calculation, which was computed by dividing the number of service hours actually operated by the number of service hours scheduled. This percentage was applied to schedule VRMs to determine the number of VRMs actually operated and the number of missed VRMs. We selected a sample of four routes, recalculated the VRMs and compared them to amounts used in the total VRM without exception. We recalculated the percentage of actual revenue hours over the scheduled revenue hours used to determine the missed VRM, without exception.*

- If actual VRMs are calculated from hubodometers, document the procedures used to calculate and subtract deadhead mileage. Select a random sample of the hubodometer readings and determine that the stated procedures for hubodometer deadhead mileage adjustments are applied as prescribed. Test the arithmetical accuracy of the summary of intermediate accumulations.

*Results - This procedure is not applicable.*

- If actual VRMs are calculated from vehicle logs, select random samples of the vehicle logs and determine that the deadhead mileage has been correctly computed in accordance with FTA definitions.

*Results - For the DRPT mode, Revenue Miles are calculated based on the odometer readings from the first pickup to the last drop off. Deadhead miles are excluded from the Revenue Miles calculations. We randomly selected 30 trips to test and noted without exception that the deadhead miles are not included in the Revenue Miles calculations.*



*For the DTPT mode, the Revenue Miles are calculated by the contractors based on pick up and drop off data entered into the scheduling software. The Revenue Miles data is uploaded to the OCTA database and compared to the scheduling data for quality assurance. There are no deadhead miles since these are non-dedicated taxi trips and accordingly Revenue Miles for each trip are recorded.*

*For the VPPT mode deadhead miles are automatically excluded because only commute miles are entered into the calculation of Revenue Miles and the results are reviewed by the Section Manager – Vanpool Program.*

- n. For rail modes, review the recording and accumulation sheets for actual VRMs and determine that locomotive miles are not included in the computation.

*Results - The procedure identified above is not applicable as OCTA does not provide rail service.*

- o. If fixed guideway or High Intensity Busway directional route miles (FG or HIB DRM) are reported, interview the person responsible for maintaining and reporting NTD data whether the operations meet FTA definition of fixed guideway (FG) or High Intensity Busway (HIB) in that the service is:
- Rail, trolleybus (TB), ferryboat (FB), or aerial tramway (TR); or
  - Bus (MB, CB, or RB) service operating over exclusive or controlled access rights-of-way (ROW); and
    - i. Access is restricted;
    - ii. Legitimate need for restricted access is demonstrated by peak period level of service D or worse on a parallel adjacent highway;
    - iii. Restricted access is enforced for freeways; priority lanes used by other high occupancy vehicles (HOV) (i.e., vanpools (VP), carpools) must demonstrate safe operation; and
      - i. High Occupancy/Toll (HO/T) lanes meet FHWA requirements for traffic flow and use of toll revenues. The transit agency has provided the NTD a copy of the State's certification to the U.S. Secretary of Transportation stating that it has established a program for monitoring, assessing, and reporting on the operation of the HOV facility with HO/T lanes.

*Results – We interviewed the Administrative Specialist – Transit Division and determined that OCTA's Motor Bus services operate over HIB lanes that appear consistent with the FTA's definition of High Intensity Bus lanes.*

- p. Discuss the measurement of FG and HIB DRM with the person reporting NTD data and determine that he or she computed mileage in accordance with FTA definitions of FG/HIB and DRM. Inquire of any service changes during the year that resulted in an increase or decrease in DRMs. If a service change resulted in a change in overall DRMs, re-compute the average monthly DRMs, and reconcile the total to the FG/HIB DRM reported on the Federal Funding Allocation Statistics form.

*Results – We determined that the mileage was computed in accordance with the FTA definitions of FG/HIB DRM. Per inquiry we determined that there were no increases or decreases in DRMs during the year.*

- q. Inquire if any temporary interruptions in transit service occurred during the report year. If these interruptions were due to maintenance or rehabilitation improvements to a FG segment(s), the following apply:
- Report DRMs for the segment(s) for the entire report year if the interruption is less than 12 months in duration. Report the months of operation on the FG/HIB segments form as 12. The transit agency should document the interruption.
  - If the improvements cause a service interruption on the FG/HIB DRMs lasting more than 12 months, the transit agency should contact its NTD validation analyst to discuss. FTA will make a determination on how to report the DRMs.

*Results – Per inquiry with the Administrative Specialist – Transit Division there were no temporary interruptions in transit service during the report year.*

- r. Measure FG/HIB DRM from maps or by retracing route.

*Results - We recalculated the length of all High Intensity Bus directional routes for MBDO, CBDO and CBPT modes of service using publicly available maps without exception. The MBPT mode does not operate over HIB lanes.*

- s. Discuss whether other public transit agencies operate service over the same FG/HIB as the transit agency. If yes, determine that the transit agency coordinated with the other transit agency (or agencies) such that the DRMs for the segment of FG/HIB are reported only once to the NTD on the Federal Funding Allocation form. Each transit agency should report the actual VRM, PMT, and OE for the service operated over the same FG/HIB.

*Results - We interviewed the Administrative Specialist – Transit Division and noted that OCTA does share some High Intensity Lanes. However, the shared High Intensity Lanes were noted as claimed by the proper agency per the NTD annual reporting manual, and not by OCTA.*

- t. Review the FG/HIB segments form. Discuss the Agency Revenue Service Start Date for any segments added in the 2017 report year with the persons reporting NTD data. This is the commencement date of revenue service for each FG/HIB segment. Determine that the date reported is the date that the agency began revenue service. This may be later than the Original Date of Revenue Service if the transit agency is not the original operator. If a segment was added for the 2017 report year, the Agency Revenue Service Date must occur within the transit agency's 2017 fiscal year. Segments are grouped by like characteristics. Note that for apportionment purposes, under the State of Good Repair (§5337) and Bus and Bus Facilities (§5339) programs, the 7-year age requirement for fixed guideway/High Intensity Busway segments is based on the report year when the segment is first reported by any NTD transit agency. This pertains to segments reported for the first time in the current report year. Even if a transit agency can document an Agency Revenue Service Start Date prior to the current NTD report year, FTA will only consider segments continuously reported to the NTD.

*Results - We obtained the HIB segments form noting the High Intensity segments and dates. It was noted that OCTA added no new segments during the year.*

- u. Compare operating expenses with audited financial data after reconciling items are removed

*Results - Operating expenses were compared to the trial balances subject to audit without exception.*

- v. If the transit agency purchases transportation services, interview the personnel reporting the NTD data on the amount of PT-generated fare revenues. The PT fare revenues should equal the amount reported on the Contractual Relationship form.

*Results - We identified the PT fare revenues reported on the Contractual Relationship form and reconciled the amounts to the general ledger without exception.*

- w. If the transit agency's report contains data for PT services and assurances of the data for those services are not included, obtain a copy of the IAS-FFA regarding data for the PT service. Attach a copy of the statement to the report. Note as an exception if the transit agency does not have an Independent Auditor Statement for the PT data.

*Results – The data for purchased transportation are included in the reporting by OCTA and therefore no IAS for the purchased transportation services is included.*

- x. If the transit agency purchases transportation services, obtain a copy of the PT contract and determine that the contract specifies the public transportation services to be provided; the monetary consideration obligated by the transit agency or governmental unit contracting for the service; the period covered by the contract (and that this period overlaps the entire, or a portion of, the period covered by the transit agency's NTD report); and is signed by representatives of both parties to the contract. Interview the person responsible for retention of the executed contract, and determine that copies of the contracts are retained for three years.

*Results - We inspected the MBPT, CBPT, DRPT, DTPT and VPPT service contracts and determined that they contained the items noted above without exception. We inquired with the Administrative Specialist – Transit Division and the Section Manager – Vanpool Program, regarding OCTA's retention policy for executed contracts for purchased transportation programs. Per inquiry, the current practice is to retain contracts for seven years.*

- y. If the transit agency provides service in more than one UZA, or between an UZA and a non-UZA, inquire of the procedures for allocation of statistics between UZAs and non-UZAs. Obtain and review the FG segment worksheets, route maps, and urbanized area boundaries used for allocating the statistics, and determine that the stated procedure is followed and that the computations are correct.

*Results - OCTA provides services in more than one UZA but does not provide services to non urbanized areas. Allocations to urbanized areas are based on trip pattern analysis. The number of yearly trips per pattern is multiplied by the number of miles determined for each UZA. Eight allocations were tested for the MBDO, MBPT, CBDO and CBPT services without exception.*

- z. Compare the data reported on the Federal Funding Allocation Statistics Form to data from the prior report year and calculate the percentage change from the prior year to the current year. For actual VRM, PMT or OE data that have increased or decreased by more than 10 percent, or FG DRM data that have increased or decreased. Interview transit agency management regarding the specifics of operations that led to the increases or decreases in the data relative to the prior reporting period.

*Results – The following fluctuations were noted on the FFA-10 Form:*

- A 16.7% decrease in Passenger Miles for MBDO
- A 22.6% decrease in Passenger Miles for CBPT
- A 18.1% decrease in Operating Expenses for CBPT
- A 25.5% increase in Revenue Miles for DTPT
- A 25.8% increase in Passenger Miles for DTPT

- A 21.6% increase in Operating Expenses for DTPT
- A 10.1% decrease in Operating Expenses for VPPT

*A 16.7% decrease in the Passenger Miles for MBDO was noted. Per inquiry with the Administrative Specialist – Transit Division, this is the result of the governing board’s decision to transition bus services to contractors.*

*A 22.6% decrease in Passenger Miles and a 18.1% decrease in Operating Expenses for CBPT was noted. Per inquiry with the Administrative Specialist – Transit Division, these are the result of the elimination of two inter-county routes during the fiscal year.*

*A 25.5% increase in Revenue Miles, a 25.8% increase in Passenger Miles and a 21.6% increase in Operating Expenses for DTPT were noted. Per inquiry with the Administrative Specialist – Transit Division, major bus service changes occurred during the report year (specifically October 2016) and service areas were eliminated, impacting about 2 percent of eligible ACCESS customers who could no longer get rides to and from their areas. As an alternative, the OCTA non-ADA Same Day Taxi program, which is what is reported as the DTPT, allows clients to use the taxi service from the out- of-service area to connect with the OC ACCESS program. The major bus service changes impacting the ACCESS service area has contributed to the growth of the Same Day Taxi program.*

*A 10.1% decrease in Operating Expenses for VPPT was noted. Per inquiry with the Section Manager – Vanpool, this was due to the merger of the two contractors used by the Vanpool service. The merger resulted in lower operating costs during the fiscal year.*

- aa. The auditor should document the specific procedures followed, documents reviewed, and tests performed in the work papers. The work papers should be available for FTA review for a minimum of three years following the NTD report year. The auditor may perform additional procedures, which are agreed to by the auditor and the transit agency, if desired. The auditor should clearly identify the additional procedures performed in a separate attachment to the statement as procedures that were agreed to by the transit agency and the auditor but not by FTA.

*Results – We have documented the procedures followed based on the FTA 2017 Policy Manual Exhibit 68 - Federal Funding Allocation Data Review - Suggested Procedures, and noted the documents inspected and tests performed in our workpapers. Additional procedures were not performed.*