

NOTE:

All exhibits in this report are presented at the end of the associated discussion in each section.

EXECUTIVE SUMMARY

This executive summary highlights the findings from the performance audit of the Eastern Contra Costa Transit Authority (ECCTA, or Tri Delta Transit). In California, a performance audit must be conducted every three years of any transit operator receiving Transportation Development Act (TDA) Article 4 funds, to determine whether the operator is in compliance with certain statutory and regulatory requirements, and to assess the efficiency and effectiveness of the operator's services. The two service modes operated by Tri Delta Transit, bus and paratransit, are the prime focus of this performance audit. The audit period is Fiscal Years 2018 through 2020 (from July 1, 2017 through June 30, 2020). NOTE: Due to the COVID-19 emergency it is recognized that performance in the latter part of FY2020 is anomalous with the earlier part of the audit period. As such, trend analyses in this report do not place much emphasis on performance beyond FY2019 for the purposes of drawing conclusions and formulating recommendations.

Performance Audit and Report Organization

The performance audit was conducted for MTC in accordance with its established procedures for performance audits. The final audit report consists of these sections:

- An assessment of data collection and reporting procedures;
- A review of performance trends in TDA-mandated indicators and component costs;
- A review of compliance with selected PUC requirements;
- An evaluation of Tri Delta Transit's actions to implement the recommendations from the last performance audit;

- An evaluation of functional performance indicator trends; and
- Findings, conclusions, and recommendations to further improve Tri Delta Transit's performance based on the results of the previous sections.

Comments received from Tri Delta Transit and MTC staff regarding the draft report will be incorporated into the final report. Highlights from the key activities are presented in this executive summary.

Results and Conclusions

Review of TDA Data Collection and Reporting Methods - The purpose of this review is to determine if Tri Delta Transit is in compliance with the TDA requirements for data collection and reporting. The review is limited to the five data items needed to calculate the TDA-mandated performance indicators. This review has determined that Tri Delta Transit is in compliance with the data collection and reporting requirements for all five TDA statistics. In addition, the statistics collected over the period appear to be consistent with the TDA definitions and indicate general consistency in terms of the direction and magnitude of the year-to-year changes across the statistics.

<u>Performance Indicators and Trends</u> – Tri Delta Transit's performance trends for the five TDA-mandated indicators were analyzed by mode. A six-year analysis period was used for all the indicators. In addition, component operating costs were analyzed.

- <u>Bus Service</u> The following is a brief summary of the TDA performance trend highlights over the six-year period of FY2015 through FY2020:
 - There was an average annual increase in the operating cost per hour of
 3.5 percent, which amounted to a 0.7 percent increase in inflation adjusted dollars.

- The cost per passenger increased on average by 19.5 percent per year, resulting in an average annual increase of 16.3 percent in constant FY2015 dollars. Only about half of the increase occurred between FY2015 and FY2019.
- Passenger productivity decreased, with passengers per vehicle service hour decreasing by 13.4 percent per year overall, and passengers per vehicle service mile decreasing by 11.8 percent annually. However, approximately one third of the decrease for each of the two indicators was due to the effects of COVID restrictions on ridership.
- Employee productivity decreased an average 1.4 percent per year.

The following is a brief summary of the component operating costs trend highlights for the bus service between FY2015 through FY2020:

- Purchased transportation costs increased an average 4.9 percent per year, remaining the largest component cost area at over 51 percent of total costs in each year. Purchased transportation costs increased during four years of the review period, with the largest increase of 9.4 percent in FY2017.
- In-house labor and fringe benefit costs increased by 4.6 percent and 1.8 percent, respectively, and both of these categories combined comprise about 21 percent of operating costs during the review period. Service costs increased by 2.1 percent on average per year and comprised about 4 percent of operating costs during the review period.
- Average annual costs increased over the review period for both the fuels/lubricants (0.3 percent) and casualty/liability (8.3 percent) categories. The share of fuels/lubricants costs decreased from about 10.7 percent to 9.1 percent of total operating costs over the review period.
- There was a 6.2 percent decrease in other expenses, which comprised about 4.0 percent of total costs for the review period. Materials/supplies costs increased an average of about 5.5 percent per year, and comprised about 5.5 percent of total operating costs during the review period.

- <u>Paratransit</u> The following is a brief summary of the TDA performance trend highlights over the six-year period of FY2015 through FY2020:
 - Cost effectiveness showed an increase, with an average annual decrease in the operating cost per passenger of 2.0 percent. This amounted to an average annual decrease of 4.7 percent in inflation adjusted dollars. Costs were down by 32.0 percent from FY2015 through FY2019.
 - Cost efficiency showed a small decrease, with operating cost per hour increasing an average of 3.3 percent per year, or a 0.4 percent annual increase when expressed as normalized FY2015 dollars. From FY2015 through FY2019 costs per hour decreased by 1.0 percent per year.
 - Passenger productivity showed increases. Passengers per hour increased 5.4 percent per year on average, with passengers per service mile increasing 0.6 percent annually.
 - Employee productivity was stable, and saw an annual decrease of 0.5 percent.

The following is a brief summary of the component operating costs trend highlights for paratransit between FY2015 through FY2020:

- Purchased transportation costs represented the largest portion of total paratransit operating costs, at about 70 percent throughout the review period, and increased by 0.8 percent per year on average.
- Annual average increases were seen in the labor (7.1 percent), fringe benefits (4.6 percent), and services (7.2 percent) categories, however, these three categories combined account for only about 15 percent of the total paratransit costs.
- Average annual cost decreases occurred in the fuel/lubricants (1.4 percent) and materials/supplies (0.9 percent) categories during the review period. These two categories comprised about 12.5 percent of paratransit component costs within the review period.

 A decrease was shown in the casualty/liability (3.4 percent) category and an increase was seen in other expenses (4.5 percent), yet both areas combined comprise less than three percent of total expenses.

<u>Compliance with Statutory Requirements</u> – Tri Delta Transit is in compliance with each of the seven sections of the state PUC that were reviewed as part of this performance audit. These sections included requirements concerning CHP terminal safety inspections, labor contracts, reduced fares, Welfare-to-Work, revenue sharing, and evaluating passenger needs.

<u>Status of Prior Audit Recommendations</u> – There were no recommendations suggested in Tri Delta Transit's prior performance audit.

<u>Functional Performance Indicator Trends</u> - To further assess Tri Delta Transit's performance over the past three years, a detailed set of systemwide and modal functional area performance indicators was defined and reviewed.

- <u>Systemwide (All Modes)</u> The following is a brief summary of the systemwide functional trend highlights between FY2018 and FY2020:
 - Administrative costs as a percentage of total operating costs decreased slightly, but administrative cost per vehicle service hour remained unchanged.
 - Marketing costs as a percentage of administrative costs were unchanged between FY2018 and FY2019 before a decrease in FY2020. Marketing costs per unlinked passenger trip increased slightly from FY2018 to FY2020.
 - The systemwide farebox recovery ratio decreased nearly 20 percent between FY2018 and FY2019.

- <u>Bus Service</u> The following is a brief summary of the bus service functional trend highlights between FY2018 and FY2020:
 - Service Planning results showed operating costs per passenger mile increasing by 171 percent overall, with increases of over 63 percent occurring in both FY2019 and FY2020. Vehicle miles in service and vehicle hours in service stayed roughly the same at about 86 percent for vehicle service miles and 88 for vehicle service hours as a percentage of total miles and hours. Passengers per vehicle service mile declined by 32.2 percent while passengers per vehicle service declined by 36.2 percent, with slightly larger decreases in FY2020 compared to FY2019.
 - In Operations, overall vehicle operations costs increased slightly as a percentage of total operating costs, by 2.1 percent overall. Cost per service hour increased by 16.3 percent during the period, with similar increases in FY2019 and FY2020.
 - Farebox recovery decreased in FY2019 and FY2020, with the larger decrease of 30.4 percent seen in FY2019. TDA recovery ratio also declined by 10.3 percent in FY2019 and 26.7 percent in FY2020.
 - Percentage of on time trips increased by 4.9 percent over the three year period. Percentage of missed trips declined by 13 percent over three years. The number of complaints declined by 6.0 percent overall during the audit period.
 - Maintenance costs increased moderately overall relative to total operating costs and also increased on a service mile basis. The vehicle spare ratio remained at 16.1 in all three years of the audit period. Mean distance between both major mechanical failures and all mechanical failures declined by 53 percent and 66 percent respectively during the three year period.
 - Safety results demonstrated fluctuations in the rate of preventable accidents per 100,000 vehicle miles, but remaining low overall, ranging from between 0.7 to 1.3 during the audit period.

- <u>Paratransit</u> The following is a brief summary of the paratransit functional trend highlights between FY2018 and FY2020:
 - The cost per passenger mile decreased in FY2019 before increasing in FY2020, when ridership decreased during the COVID-19 pandemic. The percent of vehicle miles and vehicle hours in service remained high at more than 85 percent for both in each year of the audit period. Passengers per vehicle service mile and vehicle service hour were both unchanged.
 - Operations results included an increase of 4.5 percent in vehicle operations costs as a portion of total operating costs and a 6.7 percent increase in vehicle operations cost per service hour. Farebox recovery increased by about 50 percent from FY2018 to FY2019 before a slight decrease in FY2020. TDA recovery ratio decreased by 24.2 percent overall during the three year period.
 - Percentage of on-time trips increased by 32 percent during the audit period, complaints decreased by 68 percent during the audit period, and missed trips were below 0.0025 as a percent of total trips over the three-year period.
 - There were zero ADA trip denials during the audit period, trip cancelations increased slightly from 19.0 percent in FY2018 to 21.8 percent in FY2020, and no-show and late cancelations as a percentage of ADA trips increased from 4.2 percent in FY2018 to 8.7 percent in FY2020.
 - Maintenance results showed vehicle maintenance costs decreasing as a
 percentage of total operating costs, while vehicle maintenance costs per
 service mile increased only in FY2020, due to decreased service miles,
 yet decreased overall. The spare ratio decreased by 28 percent during
 the audit period.
 - The rate of mechanical failures for major failures and all failures both stood at 270,406 in FY2018, while there were no mechanical failures in FY2019 or FY2020.

 Safety results saw a small increase in the number of preventable accidents per 100,000 miles over the audit period, from 0.5 in FY2018 to 0.7 in FY2020.

Recommendations

No recommendations are suggested for Tri Delta Transit based on the results of this triennial performance audit.

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I. INTRODUCTION

Public Utilities Code (PUC) Section 99246 requires that a performance audit be conducted every three years of each public transit operator in California. The audit requirement pertains to recipients of Transportation Development Act (TDA) funds, and is intended to assure that the funds are being used efficiently. The substance and process of the performance audit is defined by the Regional Transportation Planning Agency (RTPA).

In the San Francisco Bay Area, the Metropolitan Transportation Commission (MTC) has been designated the RTPA and has this responsibility. By statute, the audit must be conducted in accordance with the U.S. Comptroller General's "Standards for Audit of Governmental Organizations, Programs, Activities, and Functions" (the "yellow book"). The performance audit is a systematic review to determine the extent to which a transit operator has complied with pertinent laws and regulations, and conducted operations in an efficient and economical manner. Relative to system compliance testing, all findings are reported regardless of materiality.

This report has been prepared as part of the performance audit of the Eastern Contra Costa Transit Authority (ECCTA), also known as Tri Delta Transit. The two modes operated by Tri Delta Transit, bus and paratransit, are the focus of this performance audit. The audit period is Fiscal Years 2018 through 2020 (from July 1, 2017) through June 30, 2020). NOTE: Due to the COVID-19 emergency it is recognized that performance in the latter part of FY2020 is anomalous with the earlier part of the audit period. As such, trend analyses in this report do not place much emphasis on performance beyond FY2019 for the purposes of drawing conclusions and formulating recommendations.

An overview of Tri Delta Transit is provided in Exhibit 1. This is followed by a recent organization chart in Exhibit 2, which reflects the basic organizational structure during the audit period and beyond.

Performance Audit and Report Organization

This performance audit of Tri Delta Transit was conducted for MTC in accordance with its established procedures for performance audits. The audit consisted of two discrete steps:

- 1. <u>Compliance Audit</u> Activities in this phase include:
 - An overview of data collection and reporting procedures for the five TDA performance indicators;
 - Analysis of the TDA indicators; and
 - A review of compliance with selected state Public Utilities Code (PUC) requirements.
- 2. <u>Functional Review</u> Activities in this phase include:
 - A review of actions to implement the recommendations from the prior performance audit;
 - Calculation and evaluation of functional performance indicator trends; and
 - Findings, conclusions, and the formulation of recommendations.

This report presents the findings from both phases.

Exhibit 1: System Overview

Locations

Headquarters: 801 Wilbur Avenue, Antioch, CA 94509

Establishment

The Eastern Contra Costa Transit Authority (ECCTA), commonly known as Tri Delta Transit, was formed in 1977 as a joint powers agency for the purpose of providing local bus service within eastern Contra Costa County and feeder service to BART Express bus routes, and later, directly to BART rail stations. Fixed-route bus service began in June 1977, operating under an agreement with AC Transit. Paratransit service was begun in January 1979 under contract with Community Transit Services (CTS). In 1984, Tri Delta Transit consolidated its fixed-route and paratransit services under a single contract with CTS. The current contractor, First Transit, Inc., (formerly Laidlaw Transit, Inc.) has operated Tri Delta Transit since July 1986. The maintenance function is performed in-house by ECCTA employees in ECCTA facilities.

Board

Tri Delta Transit is governed by an 11-member Board of Directors, consisting of two representatives from each of the four incorporated cities (Antioch, Brentwood, Pittsburg and Oakley), two representatives from the County, and one at-large member appointed by the other members of the Board. Day-to-day operations are the responsibility of the Chief Executive Officer.

Facilities

Maintenance, operations and administration functions are all centrally located at the Wilbur Avenue facility in Antioch. It houses both agency staff and the PT contractor's employee.

Service Data

Tri Delta Transit provides fixed-route and paratransit service within a 225 square mile area in eastern Contra Costa County. The fixed-route system consists of 20 routes: 15 weekday routes and five weekend routes. Fifteen routes serve the Antioch BART station, eleven routes serve the Pittsburg/Bay Point BART station, five routes serve the Pittsburg Center station, and one route serves the Concord BART station. Two of the routes are commuter routes and two are express routes. Service operates between approximately 3:00 a.m. and 1:00 a.m. on weekdays. Weekend service runs approximately from 6:00 a.m. to 1:00 a.m. Saturdays and 7:00 a.m. to 1:00 a.m. Sundays.

Current local cash fares are \$2.00 for passengers ages 6 through 64, and \$0.85 for passengers with disabilities and seniors ages 65 or over. Children ages 5 and under ride free with a paying customer. BART transfers, as well as various discounted day passes, multi-day passes, and multi-ride punch-passes are also available. Some are valid on connecting services for regional

trips. Express one-way fares are \$2.50; \$1.25 for passengers with disabilities and seniors.

Paratransit service is provided by Tri Delta Transit's Dial-a-Ride, a door-to-door service for both ADA eligible and non-ADA eligible seniors. ADA Dial-a-Ride service operates during the same hours as the regular fixed-route service. Non-ADA Dial-a-Ride service operates Monday through Friday from 6:30 a.m. to 5:30 p.m. and Saturday from 10:00 a.m. to 5:30 p.m. There is no non-ADA service available on Sundays. Dial-a-Ride fares are \$2.75 anywhere in the regular service area for ADA service and start at \$5.50 for non-ADA/regional trips. Personal care attendants ride free.

The current fixed-route operating fleet consists of a total of 62 buses including 58 Gillig 40' buses manufactured between 2009 and 2018, two BYD battery electric buses, and two Proterra battery electric buses. All fixed-route buses are equipped with wheelchair ramps and bike racks. The paratransit fleet consists of 28 Ford cut-away vans and six specialized medvans. In addition, four retired paratransit vehicles are being used for the recently launched microtransit program.

Recent Changes

Tri Delta Transit released an updated Short Range Transit Plan (SRTP) dated August 26, 2020. The plan includes a ten-year capital plan including a schedule for replacement of vehicles and gradual transition to a 100% zero-emission bus (ZEB) fleet.

In 2018, Route 386, which served an unincorporated area of Discovery Bay, was eliminated due to lack of ridership. ECCTA is planning to replace the former Route 386 with a new route that will operate between the Brentwood Park and Ride and the new Los Medanos College campus in Brentwood scheduled to open in FY 2021. An additional route re-design is planned to coincide with the opening of a new Oakley Park and Ride, also planned for FY 2021, which is expected to increase peak frequency of Tri Delta Transit Express Route 300.

A mobile ticketing option was implemented in June of 2018, which allows Tri Delta Transit customers the ability to purchase and store the transit agency's fare passes on a mobile device application.

In June 2019, Tri Delta Transit launched the Tri MyRide on-demand microtransit service. Tri MyRide offers additional transportation options to commuters in two underserved communities in Antioch and Pittsburg, providing them with access to BART stations adjacent to the communities. A \$2.00 cash fare per one-way passenger trip applies to the Tri MyRide microtransit service

To proactively address potential issues related to a growing population of baby boomers and overburdened paratransit system, ECCTA recently implemented a service called Mobility on Demand. The service incorporates the use of Transportation Network Companies (TNC) including Lyft and a local taxi company and provides a flexible on-demand option and discounted rides to paratransit users. The Mobility on Demand project has also boosted the productivity of ECCTA's regular paratransit service

Response to COVID-19

Tri Delta Transit paused fare collection on March 20, 2020, in response to COVID-19 health concerns. Subsequent to March 2020, personnel have worked toward implementation of safety measures to ensure the health and safety of customers and staff. Buses were upgraded to include driver barriers, hand sanitizer dispensers, and signs reminding passengers that masks and social distancing are required. In anticipation of a return to fare collection and front-door boarding, Tri Delta Transit has been giving away contactless Clipper fare payment cards free of charge. Fare collection and front-door boarding resumed on January 1, 2021.

In addition, Tri Delta Transit has provided input to the MTC's initiative -- Riding Together: Bay Area Healthy Transit Plan – the purpose of which is to identify consistent health and safety standards for public transportation customers to do and public transportation providers to implement as the Bay Area eases out of the COVID-19 stay-at-home order.

Planned Changes

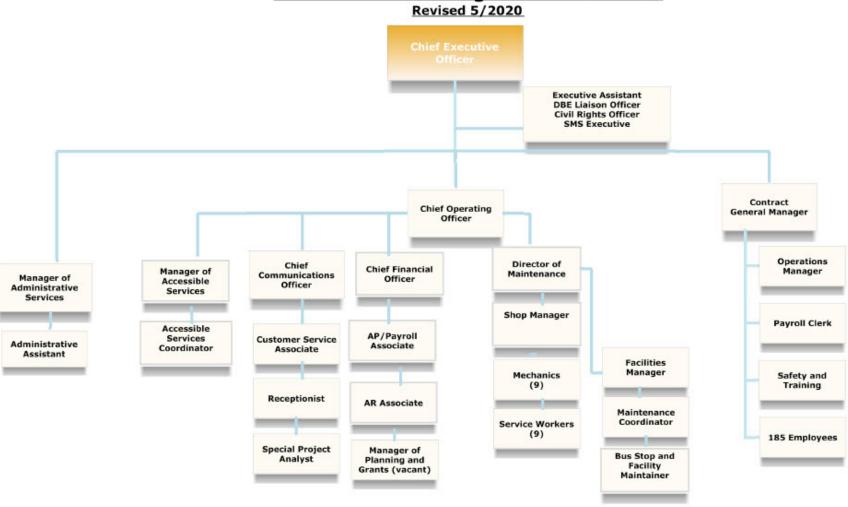
Construction on the Oakley Park and Ride will begin in FY21. This intermodal facility will be served by four routes including express route 300. A system re-design is underway and will coincide with the opening of the Oakley Park and Ride. Another inter-modal facility in Brentwood to be served by Tri Delta Transit and BART is in the planning stages and is several years away. Once the inter-modal facility is completed Tri Delta Transit anticipates another system re-design to coincide with the opening. There are no additional facilities scheduled for replacement during the tenyear period from FY 2020 through FY 2029 covered by the SRTP published in 2020.

Staff

ECCTA directly employs 37 personnel in areas including administrative, maintenance, finance, marketing, customer service, contract management and transit planning. ECCTA also contracts with First Transit, a private forprofit company, for the services of 180 bus operators, supervisors and operations management personnel to provide DR and MB service for Tri Delta Transit.

Exhibit 2: Organization Chart

Tri Delta Transit Organizational Chart



II. REVIEW OF TDA DATA COLLECTION AND REPORTING METHODS

This section focuses on the five performance indicators required by TDA law. These indicators have been defined by the state PUC to evaluate the transit operator's efficiency, effectiveness and economy. The purpose of this review is to determine if Tri Delta Transit is in compliance with the data collection and reporting requirements necessary to calculate the TDA performance indicators. The review is limited to the data items needed to calculate the indicators:

- Operating costs
- Vehicle service hours
- Vehicle service miles
- Unlinked passengers
- Employees (full-time equivalents)

The TDA indicator analysis is based on these operating and financial statistics in the National Transit Database (NTD) reports submitted annually to the Federal Transit Administration (FTA). The information reported by Tri Delta Transit covering the audit period has been reviewed. Tri Delta Transit's NTD reports include its bus and paratransit services. However, consistent with FTA reporting requirements, Tri Delta Transit does not submit employee hour information for purchased transportation service to the NTD.

Compliance with Requirements

To support this review, Tri Delta Transit staff confirmed that the data collection and reporting procedures remain unchanged from those described in the prior performance audit. Based on the information provided, as shown in Exhibit 3.1, Tri Delta

Transit is in compliance with the data collection and reporting requirements for all five TDA statistics.

Consistency of the Reported Statistics

The resulting TDA statistics for Tri Delta Transit's bus and paratransit services are shown in Exhibits 3.2 and 3.3, respectively. Included are statistics covering each fiscal year of the three-year audit period, plus the immediately preceding three fiscal years, resulting in a six-year trend. The statistics collected over the period appear to be consistent with the TDA definitions. Further, they indicate general consistency in terms of the direction and magnitude of the year-to-year changes across the statistics. For example, increases or decreases in annual operating costs are relatively proportional to increases or decreases in annual vehicle service hours and miles.

Exhibit 3.1: Compliance with TDA Data Collection and Reporting Requirements

TDA Statistic	TDA Definition	Compliance Finding	Verification Information
Operating Cost	"Operating cost" means all costs in the operating expense object classes exclusive of the costs in the depreciation and amortization expense object class of the uniform system of accounts and records adopted by the Controller pursuant to Section 99243. Also excluded are all subsidies for commuter rail services operated on railroad lines under the jurisdiction of the Federal Railroad Administration, all direct costs for providing charter services, all vehicle lease costs, and principal and interest payments on capital projects funded with certificates of participation.	In Compliance	 Operating costs are fully allocated costs of the entity. They are reported monthly via the monthly accounting close process. Costs are directly allocated to the service modes when they can be and allocated via an FTA approved split formula that takes into account a bevy of service factors. The "splits" are determined monthly in advance based on the prior month's activity
Vehicle Service Hours	"Vehicle service hours" means the total number of hours that each transit vehicle is in revenue service, including layover time.	In Compliance	 These come from the monthly operations report provided by the operator. The reports are monitored/edited and finalized by finance department and (the Special Projects Analyst and the CFO). Bill hours are based on NTD service hours which are defined as "gate to gate". This includes all service, deadhead and layover time. Vehicles Service Hours equal the scheduled hours per route per day, multiplied by the number of days in operation during the month combined with scheduled deadhead hours. For reporting purposes, the scheduled FR revenue hours are adjusted for missed trips based on AVL measurements to arrive at actual service hours

TDA Statistic	TDA Definition	Compliance Finding	Verification Information
Vehicle Service Miles	"Vehicle service miles" means the total number of miles that each transit vehicle is in revenue service.	In Compliance	 These come from the monthly operations report provided by the operator. The reports are monitored/edited and finalized by finance department and (the Special Projects Analyst and the CFO). Vehicle Service Miles equal the scheduled miles per route per day, multiplied by the number of days in operation during the month combined with scheduled deadhead miles. For reporting purposes, the scheduled FR revenue miles are adjusted for missed trips based on AVL measurements to arrive at actual service miles.
Unlinked Passengers	"Unlinked passengers" means the number of boarding passengers, whether revenue producing or not, carried by the public transportation system.	In Compliance	 All passenger boardings are considered unlinked passenger trips because the system cannot differentiate between linked and unlinked trips. Unlinked passenger trips on MB service are counted with automatic passenger counters that have been installed as part of the ITS system. The counts have been independently verified to NTD standards. They are accumulated into daily ridership by passenger by day reports. At month end, Tri Delta transit administrative staff adds up the daily riders by type and route. These totals become the basis of all ridership reports DR passengers, passenger trips, passenger miles, and all hours are determined from an ITS system that tracks these elements in conjunction with scheduling software and operator input on Mobile Data Terminals in each vehicle.

TDA Statistic	TDA Definition	Compliance Finding	Verification Information
Employee Full- Time Equivalents	2,000 person-hours of work in one year constitute one employee.	In Compliance	FTEs are included in the monthly operations report. The CFO inserts the administrative and maintenance data based on actual number of employees in that month. The contractor reports its administrative employees based on actual head count, and operating FTEs are determined by dividing the billing hours for each mode by 2,000 FTE hours per year.
			FTEs are allocated between modes the same way that operating costs are: directly to the mode where possible (operations); allocating using the FTA approved formula for those areas that are not (administration and maintenance).

Exhibit 3.2: TDA Statistics – Bus Service

TDA Statistic	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020
Operating Cost (Actual \$)	\$15,535,463	\$ 15,415,833	\$16,350,370	\$16,876,269	\$17,896,874	\$18,598,255
Annual Change		-0.8%	6.1%	3.2%	6.0%	3.9%
Vehicle Service Hours	146,063	144,692	145,397	151,949	151,788	147,004
Annual Change		-0.9%	0.5%	4.5%	-0.1%	-3.2%
Vehicle Service Miles	2,038,867	2,045,318	2,036,876	2,061,111	1,937,713	1,876,938
Annual Change		0.3%	-0.4%	1.2%	-6.0%	-3.1%
Unlinked Passengers	2,806,028	2,574,864	2,344,985	2,232,469	1,825,574	1,377,886
Annual Change		-8.2%	-8.9%	-4.8%	-18.2%	-24.5%
Employee Full-Time Equivalents	130.4	130.9	132.0	133.6	140.9	140.7
Annual Change		0.4%	0.8%	1.2%	5.5%	-0.1%

Sources: FY2015 through FY2017 - Prior Performance Audit Report

FY2018 through FY2020 - NTD Reports; FY2018 Revision 3, FY2019 Revision 4, FY2020 Revision 2, except FTEs - ECCTA Monthly Operating Statistics, Year-End Total

Exhibit 3.3: TDA Statistics – Paratransit

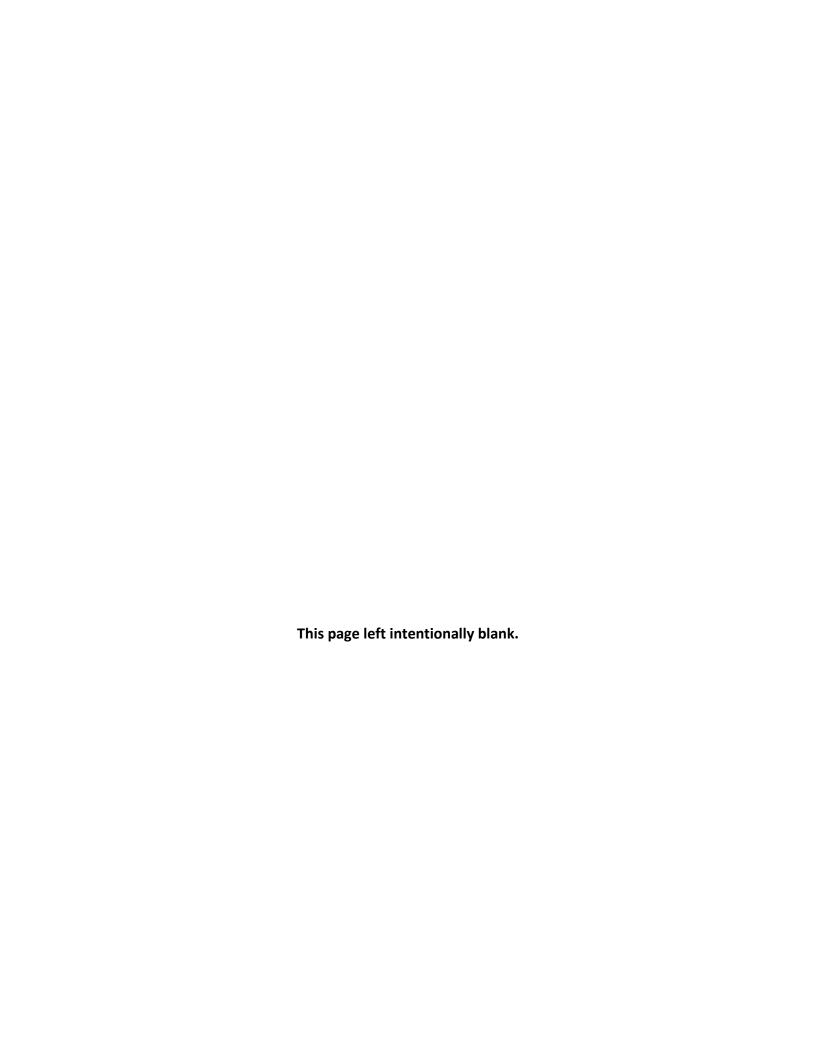
TDA Statistic	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020	
Operating Cost (Actual \$)	\$4,571,604	\$ 4,539,707	\$3,885,139	\$3,726,633	\$3,711,760	\$4,856,309	
Annual Change		-0.7%	-14.4%	-4.1%	-0.4%	30.8%	
Vehicle Service Hours	65,485	62,820	52,570	46,390	53,872	59,255	
Annual Change		-4.1%	-16.3%	-11.8%	16.1%	10.0%	
Vehicle Service Miles	796,820	775,428	751,328	692,759	927,412	907,130	
Annual Change		-2.7%	-3.1%	-7.8%	33.9%	-2.2%	
Unlinked Passengers	133,769	131,917	133,406	125,558	160,346	157,293	
Annual Change		-1.4%	1.1%	-5.9%	27.7%	-1.9%	
Employee Full-Time Equivalents	46.3	45.6	42.8	38.8	33.6	43.0	
Annual Change		-1.5%	-6.1%	-9.3%	-13.4%	28.0%	

Sources: FY2015 through FY2017 - Prior Performance Audit Report

FY2018 through FY2020 - NTD Reports; FY2018 Revision 3, FY2019 Revision 4, FY2020 Revision 2, except FTEs - ECCTA Monthly Operating Statistics, Year-End Total

FY2018 includes ADA and non-ADA Paratransit Services data from NTD Reports

FY2019 and FY2020 include ADA and non-ADA Paratransit Services, Tri MyRide, and Mobility on Demand data from NTD Reports



III. TDA PERFORMANCE INDICATORS AND TRENDS

The performance trends for Tri Delta Transit's bus and paratransit service modes are presented in this section. Performance is discussed for each of the five TDA-mandated performance indicators:

- operating cost per vehicle service hour
- passengers per vehicle service hour
- passengers per vehicle service mile
- operating cost per passenger
- vehicle service hours per full-time equivalent employee (FTE)

The performance results in these indicators were primarily developed from the information in the NTD reports filed with the FTA for the three years of the audit period. Tri Delta Transit's NTD reports were the source of all operating and financial statistics except for contractor FTEs. Contractor employee FTE data was provided by Tri Delta Transit staff from the contractor's monthly operating statistics.

In addition to presenting performance for the three years of the audit period (FY2018 through FY2020), this analysis features two enhancements:

- <u>Six-Year Time Period</u> While the performance audit focuses on the three fiscal years of the audit period, six-year trend lines have been constructed for Tri Delta Transit's service to provide a longer perspective on performance and to clearly present the direction and magnitude of the performance trends. In this analysis, the FY2018 to FY2020 trend lines have been combined with those from the prior audit period (FY2015 through FY2017) to define a six-year period of performance.
- Normalized Cost Indicators for Inflation Two financial performance indicators (cost per hour and cost per passenger) are presented in both

constant and current dollars to illustrate the impact of inflation in the Bay Area. The inflation adjustment relies on the All Urban Consumer Price Index for Urban Wage Earners and Clerical Workers (CPI-W) for the San Francisco Metropolitan Area. The average CPI-W percent change for each fiscal year has been calculated based on the bi-monthly results reported on the U.S. Department of Labor – Bureau of Labor Statistics website. The CPI-W is used since labor is the largest component of operating cost in transit. Since labor costs are typically controlled through labor contracts, changes in normalized costs largely reflect those factors that are within the day-to-day control of the transit system.

The following discussion is organized to present an overview of Tri Delta Transit's performance trends in each of the five TDA performance indicators. The discussion is organized by service mode -- bus service is discussed first, followed by paratransit. The analysis is also expanded to include a breakdown of the various component costs that contributed to the total and hourly operating costs during the last six years.

Bus Service Performance Trends

This section provides an overview of the performance of Tri Delta Transit's bus service over the past six years. The trends in the TDA indicators and input statistics are presented in Exhibit 4. The six-year trends are illustrated in Exhibits 4.1 through 4.4.

Operating Cost Per Vehicle Service Hour (Exhibit 4.1)

- A key indicator of cost efficiency, the cost per hour of bus service increased an average of 3.5 percent annually during the six-year review period.
- From FY2015 through FY2019 the cost per hour ranged from a low of \$106.36 in FY2015 to a high of \$117.91 in FY2019. There were increases in every year except FY2018. Increases included 6.2 percent in FY2019 and 7.3 percent in FY2020. The latter increase in FY2020 resulted from

- a reduction in service levels due to Tri Delta Transit's response to the COVID pandemic.
- In FY2015 constant dollars, there was an average annual increase of 0.7 percent in this indicator.

Passengers per Vehicle Service Hour (Exhibit 4.2)

- A key indicator of passenger productivity, passengers per hour decreased by an average of 13.4 percent annually during the six-year period.
- The decrease reflects an overall decrease in unlinked passengers over the six-year period (13.3 percent annually). Passengers per hour decreased during every year of the review period.
- Passengers per hour decreased overall from 19.2 in FY2015 to 12.0 in FY2019. Due to COVID restrictions productivity dropped to 9.4 in FY2020.

Passengers per Vehicle Service Mile (Exhibit 4.2)

- Similar to passengers per hour, passengers per mile also decreased overall, but by a slightly lower 11.8 percent annually on average.
- Performance in passengers per mile was similar to that of passengers per hour, with decreases during every year of the review period.
- Passengers per mile decreased overall from 1.38 passengers per mile in FY2015 to 0.94 passengers per mile in FY2019. COVID restrictions led to a decrease in FY2020, to 0.73 passengers per mile.

Operating Cost per Passenger (Exhibit 4.3)

- A key measure of cost effectiveness, the cost per passenger increased from \$5.54 in FY2015 to \$13.50 in FY2020.
- The cost per passenger increased in every year of the review period, largely due to operating cost increasing from FY2017 through FY2020 and ridership decreasing in every year of the review period.

 Overall, cost per passenger increased an average of 19.5 percent annually. With the impact of inflation removed from the cost side (normalization), cost per passenger exhibited an average annual increase of 16.3 percent per year.

Vehicle Service Hours per Employee (FTE) (Exhibit 4.4)

- A measure of employee productivity, this indicator decreased by an average 1.4 percent per year over the six years.
- Hours per FTE decreased overall from 1,120 in FY2015 to 1,045 in FY2020.
- Annual FTEs increased at a higher rate (1.5 percent annually) than vehicle service hours (0.1 percent annually) overall during the period.

Tri Delta Transit attributed the decrease in revenue hours and revenue miles in FY2019 to the implementation of a system redesign at the end of FY2018 (May 2018) that coincided with the opening of Antioch eBART. This redesign included a substantial change to Tri Delta's express route 300 in which it was cut in half so that it ended at Antioch eBART rather than continue on to Pittsburg Bay Point BART. The portion of the trip that was eliminated was entirely freeway miles. Overall, service hours were kept the same but the decrease in mileage can be attributed to this.

* * * * * *

The following is a brief summary of the bus service TDA performance trend highlights over the six-year period of FY2015 through FY2020:

- There was an average annual increase in the operating cost per hour of 3.5 percent, which amounted to a 0.7 percent increase in inflation adjusted dollars.
- The cost per passenger increased on average by 19.5 percent per year, resulting in an average annual increase of 16.3 percent in constant FY2015 dollars. Only about half of the increase occurred between FY2015 and FY2019.

- Passenger productivity decreased, with passengers per vehicle service hour decreasing by 13.4 percent per year overall, and passengers per vehicle service mile decreasing by 11.8 percent annually. However, approximately one third of the decrease for each of the two indicators was due to the effects of COVID restrictions on ridership.
- Employee productivity decreased an average 1.4 percent per year.

Exhibit 4: TDA Indicator Performance - Bus Service

	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020	Av. Ann. Chg.
Performance Indicators							
Op. Cost per Vehicle Svc. Hour (Actual \$)	\$106.36	\$106.54	\$112.45	\$111.07	\$117.91	\$126.52	
Annual Change		0.2%	5.5%	-1.2%	6.2%	7.3%	3.5%
Op. Cost per Vehicle Svc. Hour (Constant \$)	\$106.36	\$103.94	\$106.29	\$100.97	\$104.07	\$110.20	
Annual Change		-2.3%	2.3%	-5.0%	3.1%	5.9%	0.7%
Passengers per Vehicle Service Hour	19.2	17.8	16.1	14.7	12.0	9.4	
Annual Change		-7.4%	-9.4%	-8.9%	-18.1%	-22.1%	-13.4%
Passengers per Vehicle Service Mile	1.38	1.26	1.15	1.08	0.94	0.73	
Annual Change		-8.5%	-8.6%	-5.9%	-13.0%	-22.1%	-11.8%
Op. Cost per Passenger (Actual \$)	\$5.54	\$5.99	\$6.97	\$7.56	\$9.80	\$13.50	
Annual Change		8.1%	16.5%	8.4%	29.7%	37.7%	19.5%
Op. Cost per Passenger (Constant \$)	\$5.54	\$5.84	\$6.59	\$6.87	\$8.65	\$11.76	
Annual Change		5.5%	12.8%	4.3%	25.9%	35.9%	16.3%
Vehicle Service Hours per FTE	1,120	1,105	1,101	1,137	1,077	1,045	
Annual Change		-1.3%	-0.4%	3.3%	-5.3%	-3.0%	-1.4%
Input Data							
Operating Cost (Actual \$)	\$15,535,463	\$15,415,833	\$16,350,370	\$16,876,269	\$17,896,874	\$18,598,255	
Annual Change		-0.8%	6.1%	3.2%	6.0%	3.9%	3.7%
Operating Cost (Constant \$)	\$15,535,463	\$15,039,837	\$15,454,036	\$15,342,063	\$15,796,005	\$16,200,571	
Annual Change		-3.2%	2.8%	-0.7%	3.0%	2.6%	0.8%
Vehicle Service Hours	146,063	144,692	145,397	151,949	151,788	147,004	
Annual Change		-0.9%	0.5%	4.5%	-0.1%	-3.2%	0.1%
Vehicle Service Miles	2,038,867	2,045,318	2,036,876	2,061,111	1,937,713	1,876,938	
Annual Change		0.3%	-0.4%	1.2%	-6.0%	-3.1%	-1.6%
Unlinked Passengers	2,806,028	2,574,864	2,344,985	2,232,469	1,825,574	1,377,886	
Annual Change		-8.2%	-8.9%	-4.8%	-18.2%	-24.5%	-13.3%
Employee Full-Time Equivalents	130.4	130.9	132.0	133.6	140.9	140.7	
Annual Change		0.4%	0.8%	1.2%	5.5%	-0.1%	1.5%
Bay Area CPI - Annual Change		2.5%	3.3%	4.0%	3.0%	1.3%	
- Cumulative Change		2.5%	5.8%	10.0%	13.3%	14.8%	2.8%

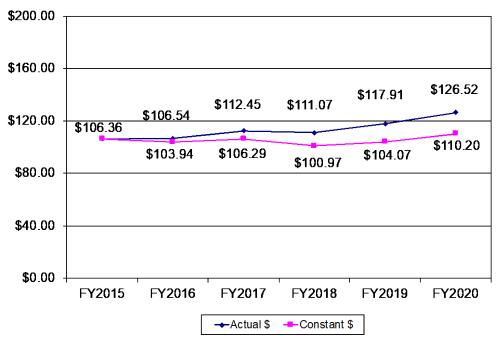
Sources: FY2015 through FY2017 - Prior Performance Audit Report

FY2018 through FY2020 - NTD Reports; FY2018 Revision 3, FY2019 Revision 4, FY2020 Revision 2,

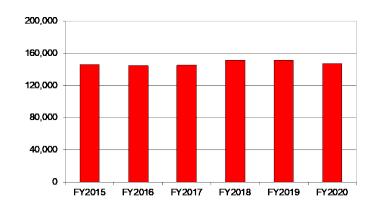
except FTEs - ECCTA Monthly Operating Statistics, Year-End Total

CPI Data - U.S. Department of Labor, Bureau of Labor Statistics

Exhibit 4.1: Operating Cost per Vehicle Service Hour - Bus Service



Vehicle Service Hours



Operating Cost

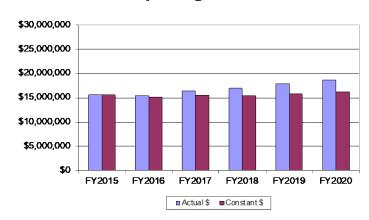
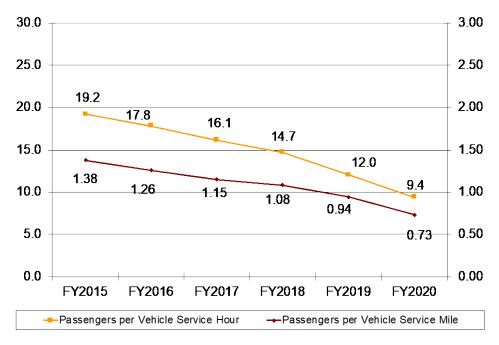


Exhibit 4.2: Passengers per Hour and per Mile – Bus Service



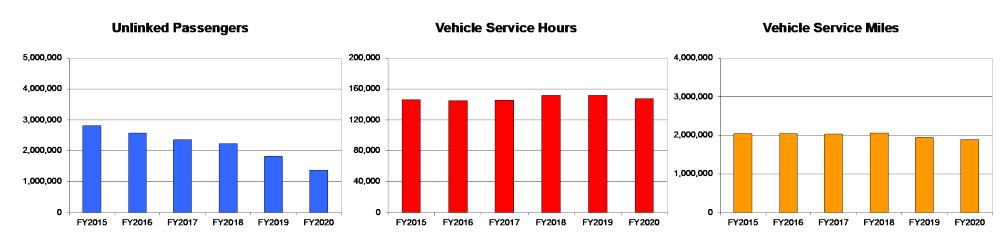
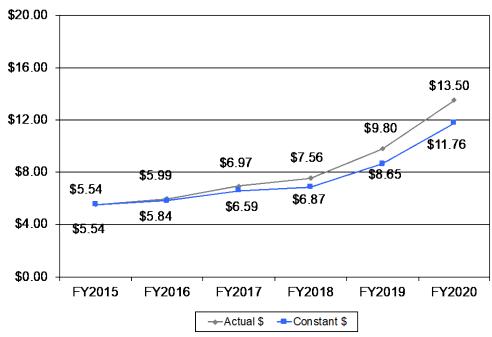


Exhibit 4.3: Operating Cost per Passenger – Bus Service



Operating Cost

\$30,000,000 \$25,000,000 \$15,000,000 \$10,000,000 \$5,000,000 \$0 FY2015 FY2016 FY2017 FY2018 FY2019 FY2020

Unlinked Passengers

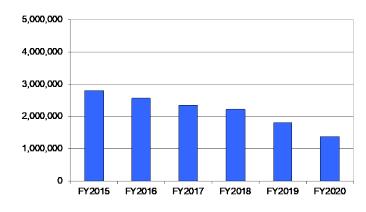
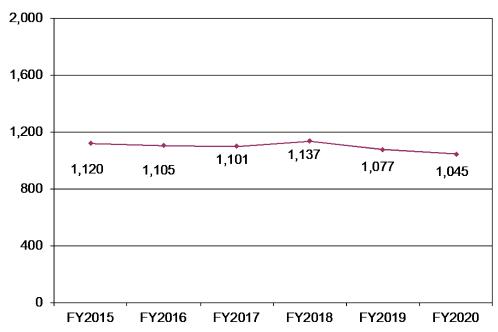
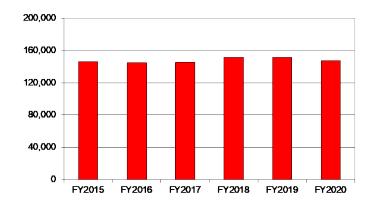


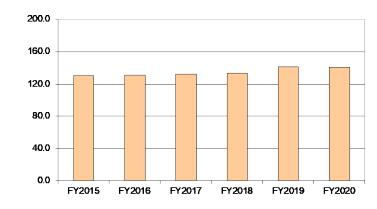
Exhibit 4.4: Vehicle Service Hours per FTE – Bus Service



Vehicle Service Hours



Full-time Equivalents



Bus Service Component Costs

Year-to-year changes in selected operating cost categories over the past six years are presented in Exhibit 4.5. Examining components of operating costs (e.g., labor, fringes, fuel, and casualty/liability) may determine what particular components had the most significant impacts on the operating costs. Exhibit 4.5 also shows the concurrent changes in vehicle service hours, and Exhibit 4.6 illustrates the portion of the cost per bus service hour that can be attributed to each included cost component.

- In-house labor costs increased by an annual average of 4.6 percent over the six-year period. This is largely attributed to an increase of 15.5 percent in FY2019.
- Fringe benefits costs increased an annual average of 1.8 percent over the review period. As was the case with in-house labor, FY2019 saw the largest increase in fringe benefits, a 13.3 percent annual change.
- Services costs increased by 2.1 percent on average per year. Annual changes in service costs varied throughout the review period with a 14.6 percent increase in FY2018 and a 15 percent decrease in FY2019.
- Purchased transportation costs increased by an annual average of 4.9 percent per year. Purchased transportation costs increased in every year of the review period, with the largest increase, 9.4 percent in FY2017.
- Costs for fuels/lubricants increased by 0.3 percent during the review period and casualty/liability increased by 8.3 percent. Annual changes in the cost of fuels/lubricants ranged from a decrease of 28.5 percent in FY2016 to an increase of 22.1 percent in FY2018.
- Materials/supplies costs increased by 5.5 percent per year from FY2015 to FY2020. The largest annual decrease was 18.2 percent in FY2018, and the largest annual increases were 15.4 percent in FY2017 and 23.4 percent in FY2020. The other expenses cost category decreased an average of 6.2 percent annually, with an increase of 14.2 percent in FY2017 and decreases of 20.6 percent and 24.7 percent in FY2018 and FY2020, respectively.

Tri Delta Transit noted that FY2020 saw an increase in Materials/Supplies costs due to the COVID-19 pandemic. Materials included PPE supplies: gloves, sanitizers, cleaning equipment, and plexiglass barriers for drivers.

Another significant increase in the Services category for FY2020 can be attributed to an increase in IT services costs. Tri Delta noted that there were substantial set up expenses for their new reporting software, Transtrack. There were also additional costs for the Amply service related to bus charging, an increase in legal and consulting services, and for the language line service which was used to a greater extent in FY2020.

* * * * * *

The following is a brief summary of the bus service component operating costs trend highlights between FY2015 and FY2020:

- Purchased transportation costs increased an average 4.9 percent per year, remaining the largest component cost area at over 51 percent of total costs in each year. Purchased transportation costs increased during four years of the review period, with the largest increase of 9.4 percent in FY2017.
- In-house labor and fringe benefit costs increased by 4.6 percent and 1.8 percent, respectively, and both of these categories combined comprise about 21 percent of operating costs during the review period. Service costs increased by 2.1 percent on average per year and comprised about 4 percent of operating costs during the review period.
- Average annual costs increased over the review period for both the fuels/lubricants (0.3 percent) and casualty/liability (8.3 percent) categories. The share of fuels/lubricants costs decreased from about 10.7 percent to 9.1 percent of total operating costs over the review period.
- There was a 6.2 percent decrease in other expenses, which comprised about 4 percent of total costs for the review period. Materials/supplies costs increased an average of about 5.5 percent per year, and comprised about 5.5 percent of total operating costs during the review period.

Exhibit 4.5: Component Cost Trends – Bus Service

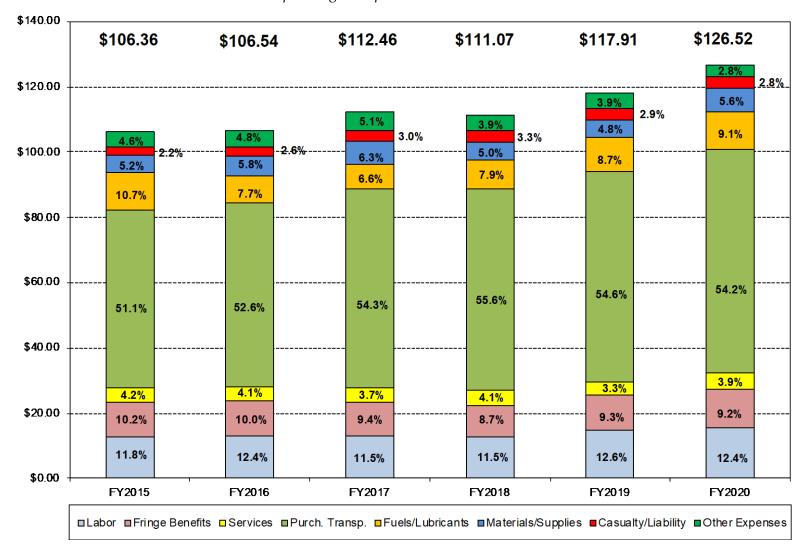
	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020	Av. Ann. Chg.
			COST CATEGORIES	,	I		
Labor - (Salaries, Wages) (a)	\$1,835,378	\$1,910,518	\$1,875,775	\$1,947,061	\$2,249,137	\$2,299,281	
Annual Change		4.1%	-1.8%	3.8%	15.5%	2.2%	4.6%
Fringe Benefits	\$1,577,225	\$1,543,212	\$1,538,355	\$1,462,029	\$1,656,932	\$1,720,176	
Annual Change		-2.2%	-0.3%	-5.0%	13.3%	3.8%	1.8%
Services	\$656,522	\$ 629,670	\$ 606,573	\$695,053	\$590,676	\$729,616	
Annual Change		-4.1%	-3.7%	14.6%	-15.0%	23.5%	2.1%
Purchased Transportation	\$7,934,593	\$8,114,508	\$8,879,342	\$9,376,671	\$9,769,492	\$10,071,189	
Annual Change		2.3%	9.4%	5.6%	4.2%	3.1%	4.9%
Fuels/Lubricants	\$1,660,729	\$1,187,484	\$1,086,511	\$1,326,350	\$1,563,040	\$1,689,352	
Annual Change		-28.5%	-8.5%	22.1%	17.8%	8.1%	0.3%
Materials/Supplies	\$803,792	\$898,538	\$1,037,136	\$848,056	\$851,091	\$1,050,213	
Annual Change		11.8%	15.4%	-18.2%	0.4%	23.4%	5.5%
Casualty/Liability	\$346,231	\$396,962	\$487,630	\$554,842	\$ 521,710	\$515,110	
Annual Change		14.7%	22.8%	13.8%	-6.0%	-1.3%	8.3%
Other Expenses (b)	\$720,993	\$ 734,941	\$839,048	\$666,207	\$ 694,796	\$ 523,318	
Annual Change		1.9%	14.2%	-20.6%	4.3%	-24.7%	-6.2%
Total	\$15,535,463	\$ 15,415,833	\$16,350,370	\$16,876,269	\$ 17,896,874	\$18,598,255	
Annual Change		-0.8%	6.1%	3.2%	6.0%	3.9%	3.7%
			PERATING STATISTI	cs	<u>.</u>		
Vehicle Service Hours Annual Change	146,063	144,692 -0.9%	145,387 0.5%	151,949 <i>4</i> .5%	151,788 -0.1%	147,004 -3.2%	 0.1%

Sources: FY2015 through FY2017 - Prior Performance Audit Report FY2018 through FY2020 - NTD Reports; FY2018 Revision 3, FY2019 Revision 4, FY2020 Revision 2,

except FTEs - ECCTA Monthly Operating Statistics, Year-End Total

Exhibit 4.6: Distribution of Component Costs – Bus Service

Operating Cost per Vehicle Service Hour



<u>Paratransit Performance Trends</u>

This section provides an overview of the performance of Tri Delta Transit's paratransit service over the six year analysis period. The trends in the TDA indicators and input data are presented in Exhibit 5. The six-year trends are illustrated in Exhibits 5.1 through 5.4.

Operating Cost per Vehicle Service Hour (Exhibit 5.1)

- Tri Delta Transit's paratransit cost per hour decreased by about 1.0 percent from FY2015 through FY2019, from \$69.81 to \$68.90 per hour. Including FY2020 which saw costs rise due to the impacts of the pandemic, the average annual increase was only 3.3 percent annually.
- Introduction of the Mobility on Demand program in FY2019, a collaboration with several TNCs, helped to bring down costs that had been rising from FY2015 through FY2018.
- With the effects of inflation removed, cost per hour exhibited an average annual increase of 0.4 percent.

Passengers per Vehicle Service Hour (Exhibit 5.2)

- Passengers per vehicle service hour increased from 2.0 per hour in FY2015 to 3.0 per hour in FY2019 and remained near the peak at 2.7 per hour in FY2020.
- The trend amounted to an average annual increase of 5.4 percent as annual increases occurred each year from FY2015 through FY2019.

Passengers per Vehicle Service Mile (Exhibit 5.2)

 Performance in passengers per vehicle service mile was mostly unchanged, with an average increase of 0.6 percent over the six-year period. Tri Delta Transit's paratransit service carried either 0.17 or 0.18 passengers per mile in every year of the review period.

Operating Cost per Passenger (Exhibit 5.3)

- The cost per passenger decreased by 2.0 percent per year on average during the review period, from \$34.18 in FY2015 to \$30.87 in FY2020.
- Through FY2019, overall operating costs were down by 32.0 percent from FY2015, due in part to efficiencies of the Mobility on Demand program.
- With the impact of inflation removed, there was an average annual decrease in the cost per passenger of 4.7 percent.

Vehicle Service Hours per FTE (Exhibit 5.4)

- Employee productivity was flat during the review period, at 1,414 hours per FTE in FY2015 and 1,378 hours in FY2020, a 0.5 percent annual decrease.
- Productivity increased by 12.0 percent overall from FY2015 through FY2019 before an increase in FTEs from 33.6 to 43.0 in FY2020 affected productivity in the final year of the review.

In FY2019, Tri Delta Transit initiated the Mobility on Demand service. This Demand Response (now DR-TN) service is provided by transportation network companies (TNC) Lyft, Uber, and United Taxi. The service is cheaper to provide than Tri Delta Transit's regular paratransit service. Tri Delta pays up to a maximum of \$16.00 per trip, which has allowed the agency to increase ridership while keeping operating costs low. The service is eligible as long as the trip starts or ends within the Tri-Delta service area. There are cases where trips go substantially outside of the service area which may account for a greater increase in miles as opposed to hours.

Tri Delta noted that for FY2020 operating costs, although there was a service decrease as a result of the COVID-19 pandemic, operating costs remained high because the agency implemented a Guarantee Pay for operators. In order to avoid operator layoffs or furloughs Tri Delta guaranteed operators 38 hours per week of pay so that there was no operator shortage upon resumption of regular service.

* * * * *

The following is a brief summary of the paratransit TDA performance trend highlights over the six-year period of FY2015 through FY2020:

- Cost effectiveness showed an increase, with an average annual decrease in the operating cost per passenger of 2.0 percent. This amounted to an average annual decrease of 4.7 percent in inflation adjusted dollars. Costs were down by 32.0 percent from FY2015 through FY2019.
- Cost efficiency showed a small decrease, with operating cost per hour increasing an average of 3.3 percent per year, or a 0.4 percent annual increase when expressed as normalized FY2015 dollars. From FY2015 through FY2019 costs per hour decreased by 1.0 percent per year.
- Passenger productivity showed increases. Passengers per hour increased 5.4 percent per year on average, with passengers per service mile increasing 0.6 percent annually.
- Employee productivity was stable, and saw an annual decrease of 0.5 percent.

Exhibit 5: TDA Indicator Performance – Paratransit

	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020	Av. Ann. Chg.
Performance Indicators							
Op. Cost per Vehicle Svc. Hour (Actual \$)	\$69.81	\$72.27	\$73.90	\$80.33	\$68.90	\$81.96	
Annual Change		3.5%	2.3%	8.7%	-14.2%	19.0%	3.3%
Op. Cost per Vehicle Svc. Hour (Constant \$)	\$69.81	\$70.50	\$69.85	\$73.03	\$60.81	\$71.39	
Annual Change		1.0%	-0. 9 %	4.5%	-16.7%	17.4%	0.4%
Passengers per Vehicle Service Hour	2.0	2.1	2.5	2.7	3.0	2.7	
Annual Change		2.8%	20.8%	6.7%	10.0%	-10.8%	5.4%
Passengers per Vehicle Service Mile	0.17	0.17	0.18	0.18	0.17	0.17	
Annual Change		1.3%	4.4%	2.1%	-4.6%	0.3%	0.6%
Op. Cost per Passenger (Actual \$)	\$34.18	\$34.41	\$29.12	\$29.68	\$23.15	\$30.87	
Annual Change		0.7%	-15.4%	1.9%	-22.0%	33.4%	-2.0%
Op. Cost per Passenger (Constant \$)	\$34.18	\$33.57	\$27.53	\$26.98	\$20.43	\$26.89	
Annual Change		-1.8%	-18.0%	-2.0%	-24.3%	31.6%	-4.7%
Vehicle Service Hours per FTE	1,414	1,378	1,228	1,196	1,603	1,378	
Annual Change		-2.6%	-10.8%	-2.7%	34.1%	-14.1%	-0.5%
Input Data							
Operating Cost (Actual \$)	\$4,571,604	\$4,539,707	\$3,885,139	\$3,726,633	\$3,711,760	\$4,856,309	
Annual Change		-0.7%	-14.4%	-4.1%	-0.4%	30.8%	1.2%
Operating Cost (Constant \$)	\$4,571,604	\$4,428,982	\$3,672,154	\$3,387,848	\$3,276,046	\$4,230,234	
Annual Change		-3.1%	-17.1%	-7.7%	-3.3%	29.1%	-1.5%
Vehicle Service Hours	65,485	62,820	52,570	46,390	53,872	59,255	
Annual Change		-4.1%	-16.3%	-11.8%	16.1%	10.0%	-2.0%
Vehicle Service Miles	796,820	775,428	751,328	692,759	927,412	907,130	
Annual Change		-2.7%	-3.1%	-7.8%	33.9%	-2.2%	2.6%
Unlinked Passengers	133,769	131,917	133,406	125,558	160,346	157,293	
Annual Change		-1.4%	1.1%	- 5.9%	27.7%	-1.9%	3.3%
Employee Full-Time Equivalents	46.3	45.6	42.8	38.8	33.6	43.0	
Annual Change		-1.5%	-6.1%	-9.3%	-13.4%	28.0%	-1.5%
Bay Area CPI - Annual Change		2.5%	3.3%	4.0%	3.0%	1.3%	
- Cumulative Change		2.5%	5.8%	10.0%	13.3%	14.8%	2.8%

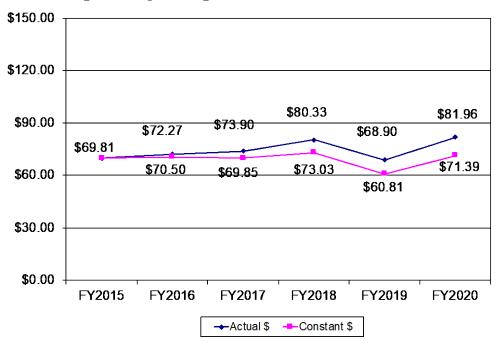
Sources: FY2015 through FY2017 - Prior Performance Audit Report

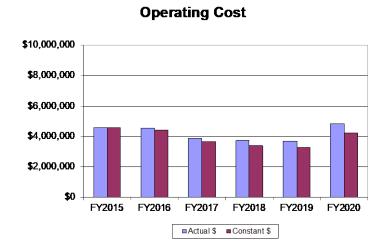
FY2018 through FY2020 - NTD Reports; FY2018 Revision 3, FY2019 Revision 4, FY2020 Revision 2, except FTEs; ECCTA Monthly Opera FY2018 includes ADA and non-ADA Paratransit Services data from NTD Reports

FY2019 and FY2020 includes ADA and non-ADA Paratransit Services, Tri MyRide, and Mobility on Demand (TNC) data rom NTD Reports CPI Data - U.S. Department of Labor, Bureau of Labor Statistics

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Exhibit 5.1: Operating Cost per Vehicle Service Hour – Paratransit





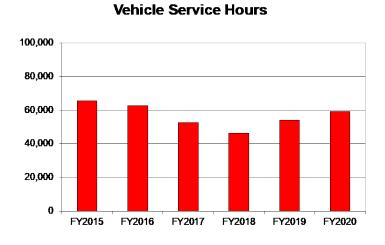
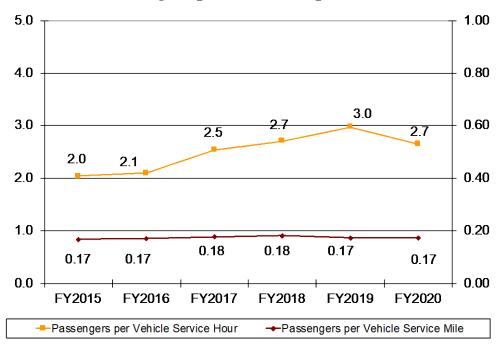


Exhibit 5.2: Passengers per Hour and per Mile – Paratransit



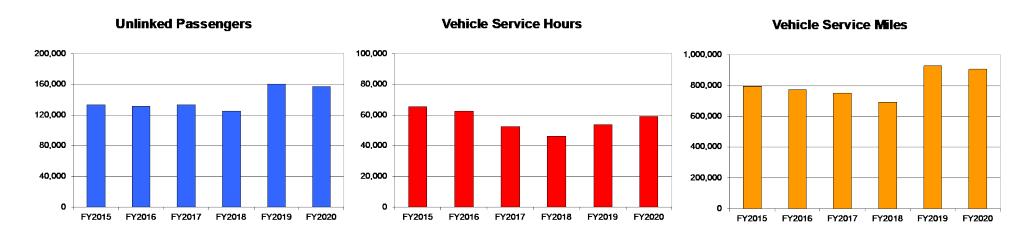
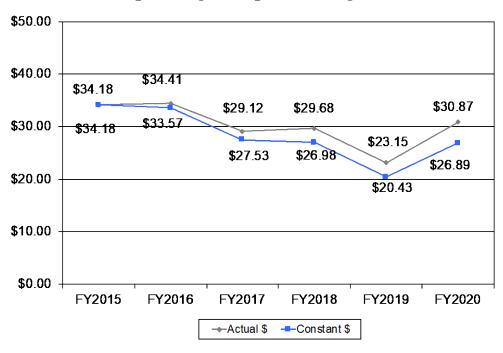
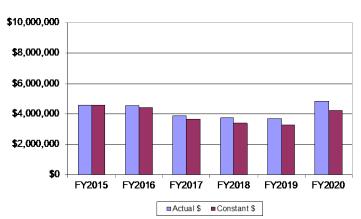


Exhibit 5.3: Operating Cost per Passenger – Paratransit







Unlinked Passengers

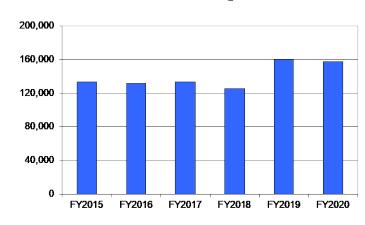
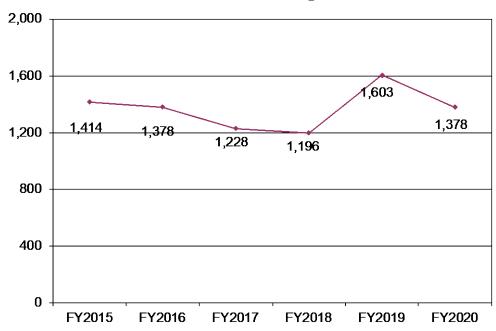
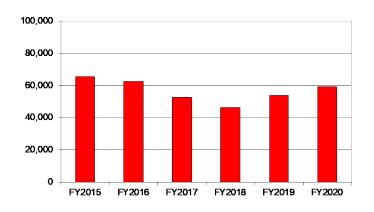


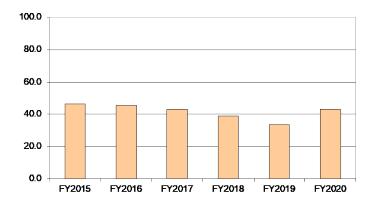
Exhibit 5.4: Vehicle Service Hours per FTE – Paratransit



Vehicle Service Hours



Full-time Equivalents



Paratransit Component Costs

The year-to-year changes in selected operating cost categories are presented in Exhibit 5.5, along with the concurrent changes in vehicle service hours. The portions of the cost per vehicle service hour that can be attributed to each included cost component are shown in Exhibit 5.6.

- In-house labor costs increased an annual average of 7.1 percent over the sixyear period. FY2019 saw a decrease of 43.5 percent while FY2020 saw an increase of 55.2 percent. Corresponding FTEs decreased 28.0 percent from FY2015 through FY2019 before a 28.0 percent increase in FY2020. Labor comprises about 6.0 percent of total operating costs for paratransit.
- Fringe benefits costs increased an annual average of 4.6 percent. This category also saw a 43.1 percent decrease in FY2019 prior to a 56.1 percent increase in FY2020. Overall, fringe benefits comprise about 4.5 percent of total operating costs.
- Purchased transportation costs decreased by 0.8 percent per year on average. Purchased transportation costs, which comprise over 70.0 percent of total operating costs, fluctuated over the review period, with a decrease of 23.9 percent in FY2017 and a 27.7 percent increase in FY2020.
- Average annual costs for both fuels/lubricants and materials/supplies decreased by 1.4 percent and 0.9 percent, respectively. Fuels/lubricants comprise about 9.0 percent of total operating costs while materials/supplies comprise about 3.0 percent of costs. Services saw an average annual change of 7.2 percent, with increases of 38.4 percent in FY2017 and 66.4 percent in FY2020. The services category makes up about 3.5 percent of paratransit costs.
- There was a decrease in the casualty/liability costs of 3.4 percent per year on average due to a 50.9 percent decrease in FY2017. In the other expenses category the average annual change was 4.5 percent. These two cost categories combine to comprise about 3.0 percent of total operating costs.

Tri Delta Transit noted that FY2020 saw an increase in Materials/Supplies costs due to the COVID-19 pandemic for Paratransit services as well. Materials included PPE supplies: gloves, sanitizers, cleaning equipment, and plexiglass barriers for drivers.

* * * * *

The following is a brief summary of the paratransit component operating costs trend highlights between FY2015 and FY2020:

- Purchased transportation costs represented the largest portion of total paratransit operating costs, at about 70 percent throughout the review period, and increased by 0.8 percent per year on average.
- Annual average increases were seen in the labor (7.1 percent), fringe benefits (4.6 percent), and services (7.2 percent) categories, however, these three categories combined account for only about 15 percent of the total paratransit costs.
- Average annual cost decreases occurred in the fuel/lubricants (1.4 percent) and materials/supplies (0.9 percent) categories during the review period. These two categories comprised about 12.5 percent of paratransit component costs within the review period.
- A decrease was shown in the casualty/liability (3.4 percent) category and an increase was seen in other expenses (4.5 percent), yet both areas combined comprise less than three percent of total expenses.

Exhibit 5.5: Component Costs Trends – Paratransit

	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020	Av. Ann. Chg.
		C	OST CATEGORIES				
Labor - (Salaries, Wages) (a)	\$203,544	\$206,147	\$271,153	\$326,723	\$184,628	\$286,558	
Annual Change		1.3%	31.5%	20.5%	-43.5%	55.2%	7.1%
Fringe Benefits	\$168,438	\$162,133	\$218,964	\$237,218	\$134,902	\$210,536	
Annual Change	, ,	. ,	, ,	, ,		, ,	
Annual Change		-3.7%	35.1%	8.3%	-43.1%	56.1%	4.6%
Services	\$139,709	\$130,082	\$179,971	\$155,934	\$118,623	\$197,404	
Annual Change		-6.9%	38.4%	-13.4%	-23.9%	66.4%	7.2%
Purchased Transportation	\$3,376,289	\$3,440,888	\$2,616,909	\$2,411,083	\$2,747,015	\$3,508,777	
•	ψ0,070,200	1.9%	-23.9%		13.9%	27.7%	0.8%
Annual Change		1.9%	-23.9%	-7.9%	13.9%	21.1%	0.6%
Fuels/Lubricants	\$428,435	\$351,799	\$338,475	\$369,952	\$358,730	\$399,176	
Annual Change		-17.9%	-3.8%	9.3%	-3.0%	11.3%	-1.4%
Materials/Supplies	\$128,104	\$114,362	\$153,604	\$129,622	\$63,119	\$122,524	
Annual Change		-10.7%	34.3%	-15.6%	-51.3%	94.1%	-0.9%
Casualty/Liability	\$66,215	\$71,381	\$35,020	\$39,240	\$46,510	\$55,648	
Annual Change	φ00,213	7.8%	-50.9%	12.1%	18.5%	19.6%	-3.4%
7 iinidal Chango		7.6%	-50.9%	12.1%	16.5%	19.0%	-3.4%
Other Expenses (b)	\$60,870	\$62,915	\$71,043	\$56,861	\$58,233	\$75,686	
Annual Change		3.4%	12.9%	-20.0%	2.4%	30.0%	4.5%
Total	\$4,571,604	\$4,539,707	\$3,885,139	\$3,726,633	\$3,711,760	\$4,856,309	
Annual Change		-0.7%	-14.4%	-4.1%	-0.4%	30.8%	1.2%
		OPE	RATING STATISTIC	CS .			
Vehicle Service Hours	65,485	62,820	52,570	46,390	53,872	59,255	
Annual Change		-4.1%	-16.3%	-11.8%	16.1%	10.0%	-2.0%

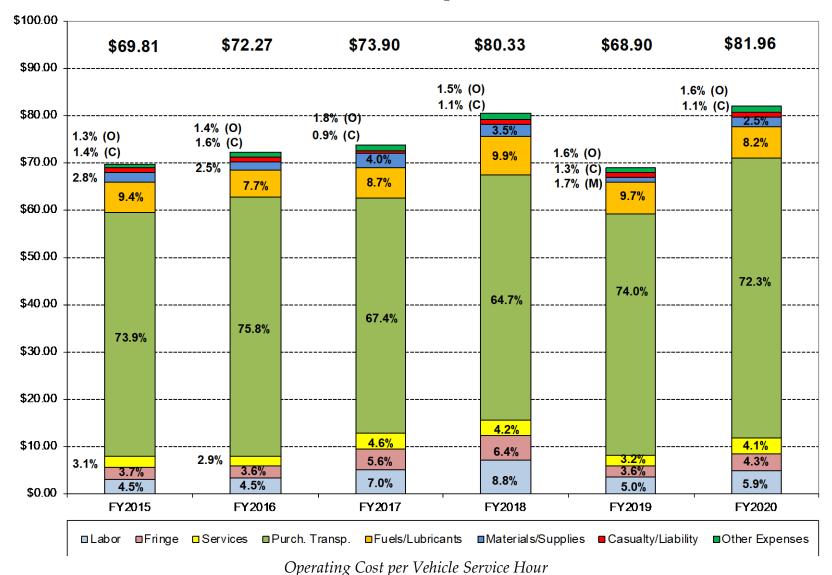
Sources: FY2015 through FY2017 - Prior Performance Audit Report; FY2018 through FY2020 - NTD Reports; FY2018 Revision 3, FY2019 Revision 4, FY2020 Revision 2 FY2018 includes ADA and non-ADA paratransit services data from NTD reports

FY2019 and FY2020 includes ADA and non-ADA paratransit services, Tri MyRide, and Mobility on Demand (TNC) data from NTD Reports

⁽a) includes other salaries and wages and other paid absences

⁽b) Includes tires/tubes, utilities, taxes, and miscellaneous expenses

Exhibit 5.6: Distribution of Component Costs – Paratransit



IV. COMPLIANCE WITH PUC REQUIREMENTS

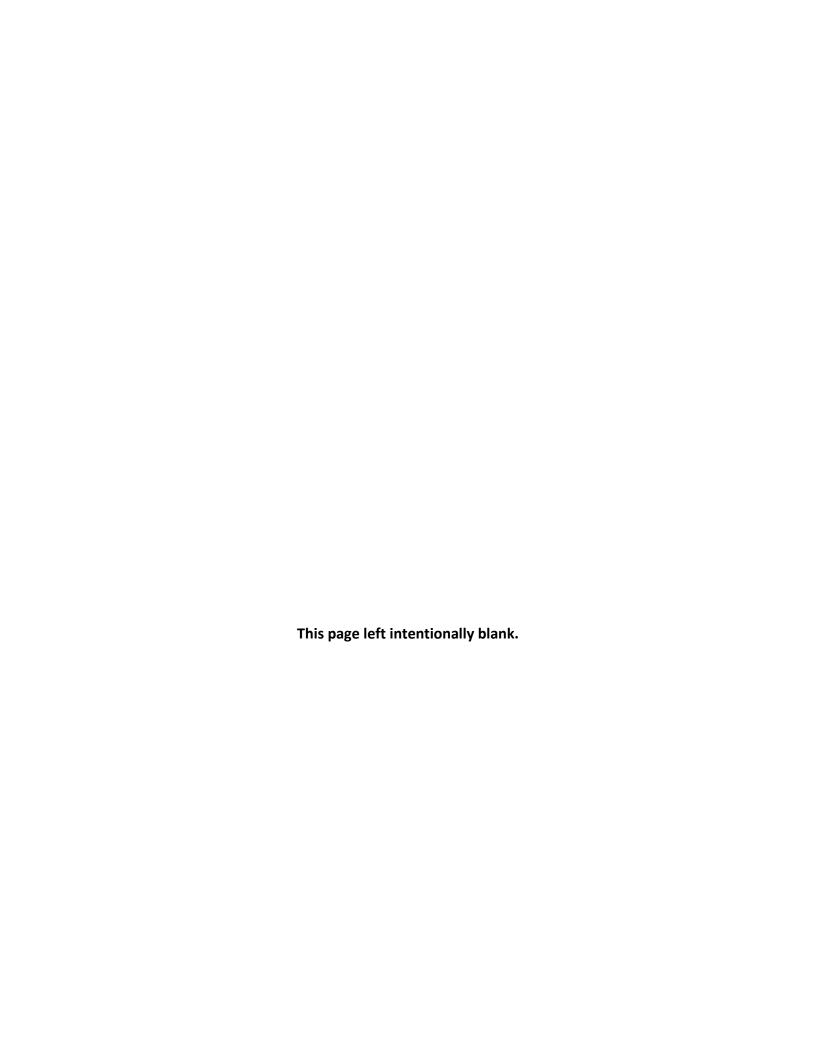
An assessment of Tri Delta Transit's compliance with selected sections of the state Public Utilities Code (PUC) has been performed. The compliance areas included in this review are those that MTC has identified for inclusion in the triennial performance audit. Other statutory and regulatory compliance requirements are reviewed by MTC in conjunction with its annual review of Tri Delta Transit's TDA-STA claim application.

The results from this review are detailed by individual requirement in Exhibit 6. Tri Delta Transit is in compliance with each of the seven sections of the state PUC that were reviewed as part of this performance audit. These sections included requirements concerning CHP terminal safety inspections, labor contracts, reduced fares, Welfare-to-Work, revenue sharing, and evaluating passenger needs.

Exhibit 6: Compliance with State PUC Requirements

Code Reference	Operator Compliance Requirements	Compliance Finding	Verification Information
PUC99251	CHP Certification - The CHP has, within the 13 months prior to each TDA claim submitted by an operator, certified the operator's compliance with Vehicle Code Section 1808 following a CHP inspection of the operator's terminal	In Compliance	Satisfactory Inspections: • 2018: 12/21/18 • 2019: 12/13/19 • 2020: 12/23/20
PUC99264	Operator-to-Vehicle Staffing - The operator does not routinely staff with two or more persons public transportation vehicles designed to be operated by one person	In Compliance	No provision for excess vehicle staffing in Transit Services Agreement between ECCTA and First Transit, Inc. (July 1, 2016 – June 30, 2020).
PUC99314.5 (e)(1)(2)	Part Time Drivers and Contracting - Operators receiving STA funds are not precluded by contract from employing part-time drivers or from contracting with common carriers	In Compliance	 Part Time Drivers – No prohibition of part-time drivers in Transit Services Agreement between ECCTA and First Transit, Inc. (July 1, 2016 – June 30, 2020). Contracting - ECCTA contracts with First Transit, Inc. to provide its fixed-route and paratransit services.
PUC99155	Reduced Fare Eligibility - For any operator who received TDA Article 4 funds, if the operator offers reduced fares to senior citizens and disabled persons, applicant will honor the federal Medicare identification card, the California Department of Motor Vehicles disability ID card, the Regional Transit Connection Discount Card, or any other current identification card issued by another transit operator that is valid for the type of transportation service or discount requested; and if the operator offers reduced fares to senior citizens, it also offers the same reduced fare to disabled patrons	In Compliance	Fare information in public information materials: Tri Delta Bus Book ECCTA website - http://trideltatransit.com/fares.aspx

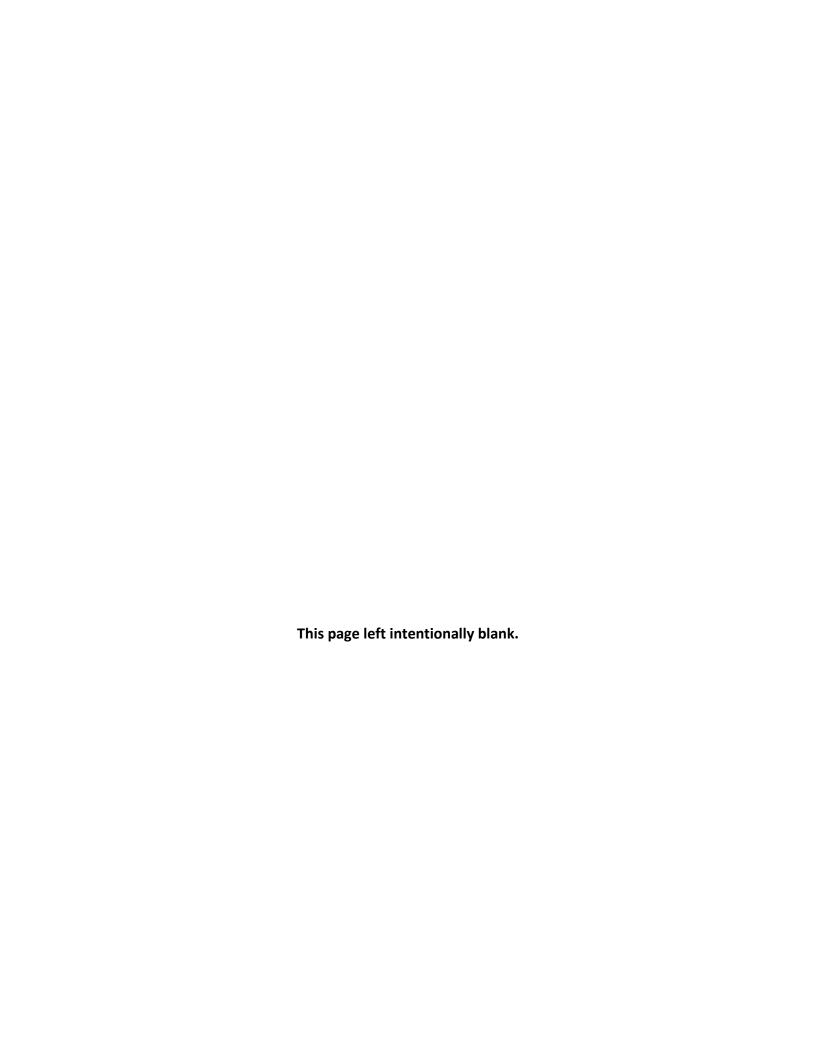
Code Reference	Operator Compliance Requirements	Compliance Finding	Verification Information
PUC99155.1 (a)(1)(2)	Welfare to Work Coordination - Operators must coordinates with county welfare departments in order to ensure that transportation moneys available for purposes of assisting recipients of aid are expended efficiently for the benefit of that population; if a recipient of CalWORKs program funds by the county, the operator shall give priority to the enhancement of public transportation services for welfare-to-work purposes and to the enhancement of transportation alternatives, such as, but not limited to, subsidies or vouchers, van pools, and contract paratransit operations, in order to promote welfare-to-work purposes	In Compliance	 Member, Contra Costa Transportation Authority Paratransit Coordinating Council (PCC) PCC participates in the regional MTC Coordinated Human Service Transportation plan. Services provided by ECCTA are included in the plan's inventory.
PUC99314.7, Govt Code 66516, MTC Res. Nos. 3837, 4073	Joint Revenue Sharing Agreement - The operator has current joint fare revenue sharing agreements in place with transit operators in the MTC region with which its service connects, and submitted copies of agreements to MTC	In Compliance	 Amended and Restated Clipper MOU, 08/21/15 and 2/19/16, effective 4/17/17. Valid revenue sharing agreement with Capital Corridor JPA
PUC99246(d)	Process for Evaluation of Passenger Needs - The operator has an established process in place for evaluating the needs and types of passengers being served	In Compliance	 2021-23 Title VI Program Submitted. On-Board Surveys: passenger surveys provide ridership data and feedback on customer perceptions of the effectiveness of services provided. Survey conducted in 2019 (included in Title VI Program). Public Outreach and Forums: travel training for seniors, staffing information booths at public events –
			customer feedback often received and fed into internal channels for customer service and planning purposes.



V. STATUS OF PRIOR AUDIT RECOMMENDATIONS

Tri Delta Transit's prior performance audit was completed in May 2018. Generally, MTC has used the audit recommendations as the basis for developing the Productivity Improvement Program (PIP) projects the operator is required to complete. MTC tracks PIP project implementation as part of its annual review of the operator's TDA-STA claim application. This section provides an assessment of actions taken by TDA-STA recipients toward implementing the recommendations advanced in the prior audit. This assessment provides continuity between the current and prior audits, which allows MTC to fulfill its obligations where the recommendations were advanced as PIP projects.

There were no recommendations made in the prior audit of Tri Delta Transit.



VI. FUNCTIONAL PERFORMANCE INDICATOR TRENDS

To further assess Tri Delta Transit's performance over the past three years, a detailed set of functional area performance indicators was defined. This assessment consists of a three-year trend analysis of the functions in each of the following areas:

- Management, Administration and Marketing
- Service Planning
- Operations
- Maintenance
- Safety

The indicators selected for this analysis were primarily those that were tracked regularly by Tri Delta Transit, or for which input data were maintained by Tri Delta Transit on an on-going basis, such as performance reports, contractor reports, and NTD reports. As such, there may be some overlap with the TDA indicators examined earlier in the audit process, but most indicators will be different. Some indicators were selected from the California Department of Transportation's Performance Audit Guidebook for Transit Operators and Regional Transportation Planning Entities as being appropriate for this evaluation. The input statistics for the indicators, along with their sources, are contained in Appendix A at the end of this report.

The trends in performance are presented over the three-year audit period to give an indication of which direction performance is moving for these indicators. The remainder of this section presents the findings from this review. The discussion presents the highlights of performance by mode (Systemwide, Bus Service and Paratransit), each followed by an exhibit illustrating the indicators by function as applicable.

Systemwide (All Modes)

For the purposes of this review, Tri Delta Transit's functional indicators relating to Management, Administration and Marketing have been included on a systemwide basis. Systemwide audit period performance is discussed below and presented in Exhibit 8.

- Administrative costs as a percentage of total operating costs decreased from 27.8 percent to 25.3 percent over the audit period.
- Administrative cost per vehicle service hour remained largely unchanged at approximately \$28 per hour over the three-year period.
- Marketing costs as a percentage of administrative costs stood at 1.8 percent in both FY2018 and FY2019 before decreasing to 0.8 percent in FY2020. Marketing costs per unlinked passenger trip increased from \$0.03 in FY2018 to \$0.05 in FY2020.
- The systemwide farebox recovery ratio declined from 12.9 percent in FY2018 to 10.4 percent in FY2019. Although there was a 22.2 percent reduction in FY2020, Tri Delta had suspended fare collection during the latter half of the fiscal year due to the COVID-19 emergency.

* * * * *

The following is a summary of the systemwide functional trend highlights between FY2018 and FY2020:

- Administrative costs as a percentage of total operating costs decreased slightly, but administrative cost per vehicle service hour remained unchanged.
- Marketing costs as a percentage of administrative costs were unchanged between FY2018 and FY2019 before a decrease in FY2020. Marketing costs per unlinked passenger trip increased slightly from FY2018 to FY2020.
- The systemwide farebox recovery ratio decreased nearly 20 percent between FY2018 and FY2019.

Exhibit 7: Functional Performance Trends – Systemwide (All Modes)

	Actual Performance		nce
FUNCTION/Indicator	FY2018	FY2019	FY2020
MANAGEMENT, ADMINISTRATION & MARKETING			
Administrative Cost/Total Operating Cost	27.8%	26.5%	25.3%
Annual Percent Change		-4.3%	-4.8%
Three Year Percent Change			-8.9%
Adminstrative Cost/Vehicle Service Hour	\$28.83	\$27.90	\$28.75
Annual Percent Change		-3.2%	3.1%
Three Year Percent Change			-0.3%
Marketing Cost/Total Administrative Cost	1.8%	1.8%	0.8%
Annual Percent Change		-3.0%	-55.3%
Three Year Percent Change			-56.7%
Marketing Cost/Unlinked Passenger Trip	\$0.04	\$0.05	\$0.03
Annual Percent Change		15.5%	-40.3%
Three Year Percent Change			-31.0%
Farebox Revenue/Operating Cost	12.9%	10.4%	8.1%
Annual Percent Change		-19.1%	-22.2%
Three Year Percent Change			-37.0%

Bus Service

Tri Delta Transit's bus service functional area trends represent areas of cost efficiency, safety, productivity, and service reliability. Audit period performance is discussed below and presented in Exhibit 9.

Service Planning

- Operating costs per passenger mile increased from \$1.06 in FY2018 to \$1.74 in FY2019 (63.3 percent), before increasing to \$2.89 in FY2020 due in part to the COVID-19 emergency.
- Approximately 86.0 percent of all vehicle miles and 88.0 percent of all vehicle hours traveled were in service in all three years of the audit period.
- Passengers per vehicle service mile declined by 32.2 percent and passengers per vehicle service hour declined by 36.2 percent during the audit period, with the majority of the decline in each area occurring in FY2020.

• Operations

- Vehicle operations costs remained mostly unchanged, increasing from 52.6 percent in FY2018 to 53.7 percent in FY2020.
- Vehicle operations costs per service hour increased overall, from \$58.47
 in FY2018 to \$62.69 in FY2019, and \$67.98 in FY2020.
- The bus service farebox recovery ratio declined from 13.5 percent in FY2018 to 9.4 percent in FY2019, then declined to 6.7 percent in FY2020.
- The TDA recovery ratio declined from 18.2 percent in FY2018 to 16.4 percent in FY2019 before a further decline to 12.0 percent due in large part to Tri Delta's response to the COVID-19 pandemic in FY2020.

- The percentage of trips that were on time increased from 83.0 percent in FY2018 to 86.0 percent in FY2020.
- The number of complaints per 100,000 vehicle service miles passenger trips decreased from 27.6 in FY2018 to 25.9 in FY2020.
- Missed trips as a percentage of total trips declined during the audit period from 3.06 percent in FY2018 to 2.68 percent in FY2020.

Maintenance

- Total maintenance costs (vehicle plus non-vehicle) increased slightly from 15.3 percent of total operating costs in FY2018 to 17.2 percent in FY2019 and 17.4 percent by FY2020.
- Vehicle maintenance costs per service mile increased from \$1.14 in FY2018 to \$1.47 in FY2019, before rising to \$1.61 in FY2020.
- The vehicle spare ratio was 16.1 percent during all three years of the audit period.
- Mean distance between major failures increased from 19,316 miles in FY2018 to 29,521 miles in FY2020 and mean distance between all failures increased from 16,868 miles in FY2018 to 28,007 miles in FY2020.

Safety

 The rate of preventable accidents per 100,000 vehicle miles increased from 0.7 in FY2018 to 1.3 in FY2019 before seeing a slight decline to 1.2 in FY2020.

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The following is a brief summary of the bus service functional trend highlights between FY2018 and FY2020:

- Service Planning results showed operating costs per passenger mile increasing by 171 percent overall, with increases of over 63 percent occurring in both FY2019 and FY2020. Vehicle miles in service and vehicle hours in service stayed roughly the same at about 86 percent for vehicle service miles and 88 for vehicle service hours as a percentage of total miles and hours. Passengers per vehicle service mile declined by 32.2 percent while passengers per vehicle service declined by 36.2 percent, with slightly larger decreases in FY2020 compared to FY2019.
- In Operations, overall vehicle operations costs increased slightly as a percentage of total operating costs, by 2.1 percent overall. Cost per service hour increased by 16.3 percent during the period, with similar increases in FY2019 and FY2020.
- Farebox recovery decreased in FY2019 and FY2020, with the larger decrease of 30.4 percent seen in FY2019. TDA recovery ratio also declined by 10.3 percent in FY2019 and 26.7 percent in FY2020.
- Percentage of on time trips increased by 4.9 percent over the three year period. Percentage of missed trips declined by 13 percent over three years. The number of complaints declined by 6.0 percent overall during the audit period.
- Maintenance costs increased moderately overall relative to total operating costs and also increased on a service mile basis. The vehicle spare ratio remained at 16.1 in all three years of the audit period. Mean distance between both major mechanical failures and all mechanical failures declined by 53 percent and 66 percent respectively during the three year period.
- Safety results demonstrated fluctuations in the rate of preventable accidents per 100,000 vehicle miles, but remaining low overall, ranging from between 0.7 to 1.3 during the audit period.

Exhibit 8: Functional Performance Trends – Bus Service

	Actual Performance		
FUNCTION/Indicator	FY2018	FY2019	FY2020
SERVICE PLANNING			
Total Operating Cost/Passenger Mile	\$1.06	\$1.74	\$2.89
Annual Percent Change		63.3%	65.9%
Three Year Percent Change			171.0%
Vehicle Service Miles/Total Miles	86.1%	86.2%	85.9%
Annual Percent Change		0.1%	-0.3%
Three Year Percent Change			-0.2%
Vehicle Service Hours/Total Hours	90.1%	87.7%	87.6%
Annual Percent Change		-2.6%	-0.2%
Three Year Percent Change			-2.8%
Passengers/Vehicle Service Mile	1.08	0.94	0.73
Annual Percent Change		-13.0%	-22.1%
Three Year Percent Change			-32.2%
Passengers/Vehicle Service Hour	14.69	12.03	9.37
Annual Percent Change		-18.1%	-22.1%
Three Year Percent Change			-36.2%
OPERATIONS			
Vehicle Operations Cost/Total Operating Cost	52.6%	53.2%	53.7%
Annual Percent Change		1.0%	1.1%
Three Year Percent Change			2.1%
Vehicle Operations Cost/Vehicle Service Hour	\$58.47	\$62.69	\$67.98
Annual Percent Change		7.2%	8.4%
Three Year Percent Change			16.3%
Farebox Revenue/Operating Cost	13.5%	9.4%	6.7%
Annual Percent Change		-30.4%	-28.7%
Three Year Percent Change			-50.3%
TDA Recovery Ratio (a)	18.2%	16.4%	12.0%
Annual Percent Change		-10.3%	-26.7%
Three Year Percent Change			-34.3%
Percentage of Trips On-Time	83.0%	82.0%	86.0%
Annual Percent Change		-1.2%	4.9%
Three Year Percent Change			3.6%
Complaints/100,000 Vehicle Service Miles	27.6	33.2	25.9
Annual Percent Change		20.6%	-22.1%
Three Year Percent Change			-6.0%
Missed Trips/Total Trips	3.06%	3.08%	2.68%
Annual Percent Change		0.7%	-12.9%
Three Year Percent Change			-12.3%

	Actı	ıal Performar	nce
FUNCTION/Indicator	FY2018	FY2019	FY2020
MAINTENANCE			
Vehicle + Non-Veh. Maint. Cost/Total Operating Cost	15.3%	17.2%	17.4%
Annual Percent Change		12.4%	1.6%
Three Year Percent Change			14.1%
Vehicle Maintenance Cost/Vehicle Service Mile	\$1.14	\$1.47	\$1.61
Annual Percent Change		29.4%	9.5%
Three Year Percent Change			41.6%
Spare Vehicles/Total Vehicles	16.1%	16.1%	16.1%
Annual Percent Change		0.0%	0.0%
Three Year Percent Change			0.0%
Mean Distance between Major Failures (Miles)	19,316	33,075	29,521
Annual Percent Change		71.2%	-10.7%
Three Year Percent Change			52.8%
Mean Distance between All Failures (Miles)	16,868	30,393	28,007
Annual Percent Change		80.2%	-7.9%
Three Year Percent Change			66.0%
SAFETY			
Preventable Accidents/100,000 Vehicle Miles	0.7	1.3	1.2
Annual Percent Change		81.7%	-4.1%
Three Year Percent Change			74.1%
Casualty & Liability Cost/Vehicle Service Hour	\$3.65	\$3.44	\$3.50
Annual Percent Change		-5.9%	1.9%
Three Year Percent Change			-4.0%
Casualty & Liability Cost/Vehicle Service Mile	\$0.27	\$0.27	\$0.27
Annual Percent Change		0.0%	1.9%
Three Year Percent Change			1.9%

⁽a) Farebox Revenue plus Local Support/Operating Cost less TDA Allowable Exclusions

<u>Paratransit</u>

Tri Delta Transit's paratransit functional area trends represent mostly similar areas to the bus service. Audit period performance is discussed below and presented in Exhibit 9.

Service Planning

- Operating costs per passenger mile decreased from \$5.03 in FY2018 year to \$3.77 (25 percent decrease) in FY2019, and then increased to \$5.76 in FY2020 (52.6 percent increase).
- Between 85.4 and 89.9 percent of all vehicle miles and 85 and 89.1
 percent of all vehicle hours were traveled in service in all three years.
- Passengers per vehicle service mile ranged from 0.17 to 0.18 during the three year audit period while passengers per vehicle service hour ranged from 2.65 to 2.98 during the same period.

Operations

- Vehicle operations cost as a percentage of total operating costs rose slightly from 73.3% in FY2018 to 76.6% in FY2020.
- Vehicle operations costs per service hour decreased from \$58.89 in FY2018 to \$54.14 in FY2019 before increasing to \$62.81 in FY2020.
- The paratransit farebox recovery ratio increased from 10.5% in FY2018 to 13.7% in FY2020. The TDA recovery ratio reflecting farebox revenue plus local support less operating cost exclusions decreased from 49.4 percent in FY2018 to 37.4 percent in FY2020.
- Percentage of on time trips increased from 66.0 percent in FY2018 to 87.0 percent in FY2020.
- Complaints per 10,000 passenger trips declined from 48.6 in FY2018 to
 42.6 in FY2019 before declining by nearly 64% to 15.4 in FY2020.

- Missed trips as a percentage of total trips were less than 0.0035 in each year of the review period, ADA trip denials as a percentage of ADA trips were zero in each year of the three year period.
- Trip cancelations as a percentage of ADA trips ranged from 19.0 percent to 21.8 percent during the review period.
- No shows and late cancelations as a percentage of ADA trips increased from 4.2 percent in FY2018 to 8.7 percent in FY2020.

• <u>Maintenance</u>

- Total maintenance costs (vehicle plus non-vehicle) decreased from 18.5 percent in FY2018 to 11.7 percent in FY2020.
- Vehicle maintenance costs per service mile decreased by 45 percent from \$0.92 in FY2018 to \$0.50 in FY2020.
- The vehicle spare ratio decreased from 18.8 percent in FY2018 to 13.5 percent in FY2020.
- Mean distance between all failures and mean distance between major failures both stood at 270,406 miles in FY2018. Total failures and major failures were zero in FY2019 and FY2020.

• <u>Safety</u>

 Preventable accidents per 100,000 vehicle miles ranged from 0.2 to 0.7 during the three year audit period.

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The following is a brief summary of the paratransit functional trend highlights between FY2018 and FY2020:

- The cost per passenger mile decreased in FY2019 before increasing in FY2020, when ridership decreased during the COVID-19 pandemic. The percent of vehicle miles and vehicle hours in service remained high at more than 85 percent for both in each year of the audit period. Passengers per vehicle service mile and vehicle service hour were both unchanged.
- Operations results included an increase of 4.5 percent in vehicle operations costs as a portion of total operating costs and a 6.7 percent increase in vehicle operations cost per service hour. Farebox recovery increased by about 50 percent from FY2018 to FY2019 before a slight decrease in FY2020. TDA recovery ratio decreased by 24.2 percent overall during the three year period.
- Percentage of on-time trips increased by 32 percent during the audit period, complaints decreased by 68 percent during the audit period, and missed trips were below 0.0025 as a percent of total trips over the three-year period.
- There were zero ADA trip denials during the audit period, trip cancelations increased slightly from 19.0 percent in FY2018 to 21.8 percent in FY2020, and and no-show and late cancelations as a percentage of ADA trips increased from 4.2 percent in FY2018 to 8.7 percent in FY2020.
- Maintenance results showed vehicle maintenance costs decreasing as a
 percentage of total operating costs, while vehicle maintenance costs per
 service mile increased only in FY2020, due to decreased service miles, yet
 decreased overall. The spare ratio decreased by 28 percent during the audit
 period.
- The rate of mechanical failures for major failures and all failures both stood at 270,406 in FY2018, while there were no mechanical failures in FY2019 or FY2020.
- Safety results saw a small increase in the number of preventable accidents per 100,000 miles over the audit period, from 0.5 in FY2018 to 0.7 in FY2020.

Exhibit 9: Functional Performance Trends – Paratransit

	Acti	ual Performar	nce
FUNCTION/Indicator	FY2018	FY2019	FY2020
SERVICE PLANNING			
Total Operating Cost/Passenger Mile	\$5.03	\$3.77	\$5.76
Annual Percent Change		-25.0%	52.6%
Three Year Percent Change			14.5%
Vehicle Service Miles/Total Miles	85.4%	89.9%	87.1%
Annual Percent Change		5.3%	-3.1%
Three Year Percent Change			2.0%
Vehicle Service Hours/Total Hours	85.7%	89.1%	85.0%
Annual Percent Change		4.0%	-4.6%
Three Year Percent Change			-0.8%
Passengers/Vehicle Service Mile	0.18	0.17	0.17
Annual Percent Change		-4.6%	0.3%
Three Year Percent Change			-4.3%
Passengers/Vehicle Service Hour	2.71	2.98	2.65
Annual Percent Change		10.0%	-10.8%
Three Year Percent Change			-1.9%
OPERATIONS			
Vehicle Operations Cost/Total Operating Cost	73.3%	78.6%	76.6%
Annual Percent Change		7.2%	-2.5%
Three Year Percent Change			4.5%
Vehicle Operations Cost/Vehicle Service Hour	\$58.89	\$54.14	\$62.81
Annual Percent Change		-8.1%	16.0%
Three Year Percent Change			6.7%
Farebox Revenue/Operating Cost	10.5%	15.7%	13.7%
Annual Percent Change		49.6%	-12.6%
Three Year Percent Change			30.7%
TDA Recovery Ratio (a)	49.4%	44.1%	37.4%
Annual Percent Change		-10.6%	-15.3%
Three Year Percent Change			-24.2%
Percentage of Trips On-Time	66.0%	63.0%	87.0%
Annual Percent Change		-4.5%	38.1%
Three Year Percent Change			31.8%
Complaints/10,000 Passenger Trips	48.6	42.6	15.4
Annual Percent Change		-12.3%	-63.7%
Three Year Percent Change			-68.2%
Missed Trips/Total Trips	0.0025	0.0035	0.0005
Annual Percent Change			
Three Year Percent Change			

	Act	Actual Performance			
FUNCTION/Indicator	FY2018	FY2019	FY2020		
OPERATIONS (Continued)					
ADA Trip Denials/Total ADA Trips	0.0%	0.0%	0.0%		
Annual Percent Change					
Three Year Percent Change					
Trip Cancellations/Total ADA Trips	19.0%	19.4%	21.8%		
Annual Percent Change		2.4%	12.2%		
Three Year Percent Change			14.9%		
No-Shows & Late Cancellations/Total ADA Trips	4.2%	5.1%	8.7%		
Annual Percent Change		23.2%	69.2%		
Three Year Percent Change			108.5%		
MAINTENANCE					
Vehicle + Non-Veh. Maint. Cost/Total Operating Cost	18.5%	9.9%	11.7%		
Annual Percent Change		-46.5%	17.9%		
Three Year Percent Change			-37.0%		
Vehicle Maintenance Cost/Vehicle Service Mile	\$0.92	\$0.30	\$0.50		
Annual Percent Change		-67.8%	68.9%		
Three Year Percent Change			-45.6%		
Spare Vehicles/Total Vehicles	18.8%	15.2%	13.5%		
Annual Percent Change		-18.8%	-11.5%		
Three Year Percent Change			-28.2%		
Mean Distance between Major Failures (Miles)	270,406	NA	NA		
Annual Percent Change					
Three Year Percent Change					
Mean Distance between All Failures (Miles)	270,406	NA	NA		
Annual Percent Change					
Three Year Percent Change					
SAFETY					
Preventable Accidents/100,000 Vehicle Miles	0.5	0.2	0.7		
Annual Percent Change		-60.7%	246.8%		
Three Year Percent Change			36.4%		

⁽a) Farebox Revenue plus Local Support/Operating Cost less TDA Allowable Exclusions

VII. CONCLUSIONS AND RECOMMENDATIONS

This report has presented the findings of the compliance audit portion of the performance audit of Tri Delta Transit's transit service. The primary focus was the three-year audit period of FY2018 through FY2020 (July 1, 2017 through June 30, 2020). It has focused on TDA compliance issues including trends in TDA-mandated performance indicators and compliance with selected sections of the state Public Utilities Code (PUC). It also provides the findings from an overview of Tri Delta Transit's data collection activities to support the TDA indicators. Performance results from the previous three years have also been included as applicable to provide a longer perspective on performance.

The key findings and conclusions from the individual sections of this performance audit are summarized below:

 <u>Data Collection</u> –Based on the information provided, Tri Delta Transit is in compliance with the data collection and reporting requirements for all five TDA statistics. In addition, the statistics collected over the six-year review period appear to be consistent with the TDA definitions, and indicate general consistency in terms of the direction and magnitude of the year-toyear changes across the statistics.

• TDA Performance Trends

Tri Delta Transit's performance trends for the five TDA-mandated indicators were analyzed by mode. A six-year analysis period was used for all the indicators. In addition, component operating costs were analyzed.

<u>Bus Service</u> – The following is a brief summary of the TDA performance trend highlights over the six-year period of FY2015 through FY2020:

- There was an average annual increase in the operating cost per hour of
 3.5 percent, which amounted to a 0.7 percent increase in inflation adjusted dollars.
- The cost per passenger increased on average by 19.5 percent per year, resulting in an average annual increase of 16.3 percent in constant FY2015 dollars. Only about half of the increase occurred between FY2015 and FY2019.
- Passenger productivity decreased, with passengers per vehicle service hour decreasing by 13.4 percent per year overall, and passengers per vehicle service mile decreasing by 11.8 percent annually. However, approximately one third of the decrease for each of the two indicators was due to the effects of COVID restrictions on ridership.
- Employee productivity decreased an average 1.4 percent per year.

The following is a brief summary of the component operating costs trend highlights for the bus service between FY2015 and FY2020:

- Purchased transportation costs increased an average 4.9 percent per year, remaining the largest component cost area at over 51 percent of total costs in each year. Purchased transportation costs increased during four years of the review period, with the largest increase of 9.4 percent in FY2017.
- In-house labor and fringe benefit costs increased by 4.6 percent and 1.8 percent, respectively, and both of these categories combined comprise about 21 percent of operating costs during the review period. Service costs increased by 2.1 percent on average per year and comprised about 4 percent of operating costs during the review period.
- Average annual costs increased over the review period for both the fuels/lubricants (0.3 percent) and casualty/liability (8.3 percent) categories. The share of fuels/lubricants costs decreased from about 10.7 percent to 9.1 percent of total operating costs over the review period.
- There was a 6.2 percent decrease in other expenses, which comprised about 4 percent of total costs for the review period. Materials/supplies

costs increased an average of about 5.5 percent per year, and comprised about 5.5 percent of total operating costs during the review period.

<u>Paratransit</u> – The following is a brief summary of the TDA performance trend highlights over the six-year period of FY2015 through FY2020:

- Cost effectiveness showed an increase, with an average annual decrease in the operating cost per passenger of 2.0 percent. This amounted to an average annual decrease of 4.7 percent in inflation adjusted dollars. Costs were down by 32.0 percent from FY2015 through FY2019.
- Cost efficiency showed a small decrease, with operating cost per hour increasing an average of 3.3 percent per year, or a 0.4 percent annual increase when expressed as normalized FY2015 dollars. From FY2015 through FY2019 costs per hour decreased by 1.0 percent per year.
- Passenger productivity showed increases. Passengers per hour increased 5.4 percent per year on average, with passengers per service mile increasing 0.6 percent annually.
- Employee productivity was stable, and saw an annual decrease of 0.5 percent.

The following is a brief summary of the component operating costs trend highlights for paratransit between FY2015 and FY2020:

- Purchased transportation costs represented the largest portion of total paratransit operating costs, at about 70 percent throughout the review period, and increased by 0.8 percent per year on average.
- Annual average increases were seen in the labor (7.1 percent), fringe benefits (4.6 percent), and services (7.2 percent) categories, however, these three categories combined account for only about 15 percent of the total paratransit costs.
- Average annual cost decreases occurred in the fuel/lubricants (1.4 percent) and materials/supplies (0.9 percent) categories during the review period. These two categories comprised about 12.5 percent of paratransit component costs within the review period.

- A decrease was shown in the casualty/liability (3.4 percent) category and an increase was seen in other expenses (4.5 percent), yet both areas combined comprise less than three percent of total expenses.
- <u>PUC Compliance</u> Tri Delta Transit is in compliance with each of the seven sections of the state PUC that were reviewed as part of this performance audit. These sections included requirements concerning CHP terminal safety inspections, labor contracts, reduced fares, Welfare-to-Work, revenue sharing, and evaluating passenger needs.
- <u>Status of Prior Audit Recommendations</u> There were no recommendations made in Tri Delta Transit's prior performance audit in 2018.

• <u>Functional Performance Indicator Trends</u>

To further assess Tri Delta Transit's performance over the past three years, a detailed set of systemwide and modal functional area performance indicators was defined and reviewed.

<u>Systemwide</u> – The following is a brief summary of the systemwide functional trend highlights between FY2018 and FY2020:

- Administrative costs as a percentage of total operating costs decreased slightly, but administrative cost per vehicle service hour remained unchanged.
- Marketing costs as a percentage of administrative costs were unchanged between FY2018 and FY2019 before a decrease in FY2020.
 Marketing costs per unlinked passenger trip increased slightly from FY2018 to FY2020.
- The systemwide farebox recovery ratio decreased nearly 20 percent between FY2018 and FY2019.

<u>Bus Service</u> – The following is a brief summary of the bus service functional trend highlights between FY2018 and FY2020:

 Service Planning results showed operating costs per passenger mile increasing by 171 percent overall, with increases of over 63 percent occurring in both FY2019 and FY2020. Vehicle miles in service and vehicle hours in service stayed roughly the same at about 86 percent for vehicle service miles and 88 for vehicle service hours as a percentage of total miles and hours. Passengers per vehicle service mile declined by 32.2 percent while passengers per vehicle service declined by 36.2 percent, with slightly larger decreases in FY2020 compared to FY2019.

- In Operations, overall vehicle operations costs increased slightly as a
 percentage of total operating costs, by 2.1 percent overall. Cost per
 service hour increased by 16.3 percent during the period, with similar
 increases in FY2019 and FY2020.
- Farebox recovery decreased in FY2019 and FY2020, with the larger decrease of 30.4 percent seen in FY2019. TDA recovery ratio also declined by 10.3 percent in FY2019 and 26.7 percent in FY2020.
- Percentage of on time trips increased by 4.9 percent over the three year period. Percentage of missed trips declined by 13 percent over three years. The number of complaints declined by 6.0 percent overall during the audit period.
- Maintenance costs increased moderately overall relative to total operating costs and also increased on a service mile basis. The vehicle spare ratio remained at 16.1 in all three years of the audit period. Mean distance between both major mechanical failures and all mechanical failures declined by 53 percent and 66 percent respectively during the three year period.
- Safety results demonstrated fluctuations in the rate of preventable accidents per 100,000 vehicle miles, but remaining low overall, ranging from between 0.7 to 1.3 during the audit period.

<u>Paratransit</u> – The following is a brief summary of the paratransit functional trend highlights between FY2018 and FY2020:

The cost per passenger mile decreased in FY2019 before increasing in FY2020, when ridership decreased during the COVID-19 pandemic. The percent of vehicle miles and vehicle hours in service remained high at more than 85 percent for both in each year of the audit period. Passengers per vehicle service mile and vehicle service hour were both unchanged.

- Operations results included an increase of 4.5 percent in vehicle operations costs as a portion of total operating costs and a 6.7 percent increase in vehicle operations cost per service hour. Farebox recovery increased by about 50 percent from FY2018 to FY2019 before a slight decrease in FY2020. TDA recovery ratio decreased by 24.2 percent overall during the three year period.
- Percentage of on-time trips increased by 32 percent during the audit period, complaints decreased by 68 percent during the audit period, and missed trips were below 0.0025 as a percent of total trips over the three-year period.
- There were zero ADA trip denials during the audit period, trip cancelations increased slightly from 19.0 percent in FY2018 to 21.8 percent in FY2020, and and no-show and late cancelations as a percentage of ADA trips increased from 4.2 percent in FY2018 to 8.7 percent in FY2020.
- Maintenance results showed vehicle maintenance costs decreasing as a percentage of total operating costs, while vehicle maintenance costs per service mile increased only in FY2020, due to decreased service miles, yet decreased overall. The spare ratio decreased by 28 percent during the audit period.
- The rate of mechanical failures for major failures and all failures both stood at 270,406 in FY2018, while there were no mechanical failures in FY2019 or FY2020.
- Safety results saw a small increase in the number of preventable accidents per 100,000 miles over the audit period, from 0.5 in FY2018 to 0.7 in FY2020.

Recommendations

No recommendations are suggested for Tri Delta Transit based on the results of this triennial performance audit.

APPENDIX A: INPUT STATISTICS FOR FUNCTIONAL PERFORMANCE MEASURES

Functional Performance Inputs - Systemwide (All Modes)

Data Item	FY2018	FY2019	FY2020	Source
Total Operating Costs	\$20,602,902	\$21,608,634	\$23,454,564	NTD F-40
Administrative Costs	\$5,718,269	\$5,736,972	\$5,930,498	NTD F-40
Vehicle Service Hours	198,339	205,660	206,259	NTD S-10 MB+DR
Marketing Costs	\$105,718	\$102,875	\$47,503	ECCTA Transtrack
Unlinked Passenger Trips	2,358,027	1,985,920	1,535,179	NTD S-10 MB+DR
Farebox Revenue (All Modes)	\$2,660,550	\$2,257,972	\$1,907,322	NTD F-10

Functional Performance Inputs – Bus Service

Data Item	FY2018	FY2019	FY2020	Source
Vehicle Service Miles	2,061,111	1,937,713	1,876,938	NTD S-10 MB
Total Vehicle Miles	2,395,221	2,249,102	2,184,518	NTD S-10 MB
Vehicle Service Hours	151,949	151,788	147,004	NTD S-10 MB
Total Vehicle Hours	168,673	173,050	167,894	NTD S-10 MB
Unlinked PassengerTrips	2,232,469	1,825,574	1,377,886	NTD S-10 MB
Farebox Revenue	\$2,270,168	\$ 1,676,283	\$ 1,242,315	NTD F-10
Total Operating Costs	\$16,876,269	\$17,896,874	\$18 ,59 8 ,255	NTD F-30 MB
Passenger Miles	15,847,376	10,291,818	6,444,844	NTD S-10 MB
Vehicle Operations Costs	\$8,884,514	\$9,516,214	\$9,994,060	NTD F-30 MB
Local Support (a)	\$808,300	\$1,251,218	\$988,021	ECCTA Transtrack
TDA Oper. Cost Exclusions - PUC 99247 (b)	\$0	\$0	\$0	ECCTA Transtrack
TDA Oper. Cost Exclusions - PUC 99268.17 (c)	\$0	\$0	\$0	ECCTA Transtrack
Trips On-Time	83.0%	82.0%	86.0%	ECCTA Transtrack
Total Trips	110,569	127,067	122,365	ECCTA Transtrack
Complaints	568	644	486	Year-End Quarterly Performance Reports
Missed Trips	3,383	3,914	3,284	ECCTA Transtrack
Vehicle Maintenance Costs	\$2,341,332	\$ 2,847,276	\$3,020,121	NTD F-30 MB
Non-Vehicle/Facility Maintenance Costs	\$236,522	\$224,225	\$221,321	NTD F-30 MB
Spare Vehicles (Total less Maximum Service)	10	10	10	NTD S-10 MB
Total Vehicles	62	62	62	NTD S-10 MB
Revenue Vehicle Mechanical System Failures - Total	142	74	78	NTD R-20
Revenue Vehicle Mechanical System Failures - Major	124	68	74	ECCTA Transtrack
Preventable Accidents (NTD Guidelines)	17	29	27	Year-End Quarterly Performance Reports
Casualty/Liability Costs	\$ 554,842	\$ 521,710	\$ 515,110	NTD F-30 MB

- (a) Local Support includes the following (USOA revenue class in parentheses):
 - · Auxiliary transportation revenue (406)
 - Taxes directly levied (408)
 - · Local cash grants and reimbursements (409)
 - · Local special fare assistance (410)
 - · Subsidy from other sectors of operation (440)
 - Other non-federal/non-state grant funds or other revenues
- (b) Operating expense object classes exclusive of the following pursuant to PUC Section 99247:
 - depreciation and amortization expenses
 - · subsidies for commuter rail services operated on railroad lines under the jurisdiction of the Federal Pailroad Administration
 - · costs for providing charter services
 - vehicle lease costs
 - principal and interest payments on capital projects funded with certificates of participation
- (c) Operating expense object class exclusions pursuant to PUC Section 99268.17:
 - additional operating costs for federally required ADA paratransit service that exceed prior year costs (CPI adjusted)
 - cost increases beyond the CPI change for: fuel; alternative fuel programs; power (including electricity);
 - insurance premiums/liability claims payouts; state and federal mandates
 - · start-up costs for new services (not more than two years)

Functional Performance Inputs – Paratransit

Data Item	FY2018	FY2019	FY2020	Source
Vehicle Service Miles	692,759	927,412	907,130	NTD S-10 DR
Total Vehicle Miles	811,217	1,031,470	1,040,911	NTD S-10 DR
Vehicle Service Hours	46,390	53,872	59,255	NTD S-10 DR
Total Vehicle Hours	54,145	60,449	69,693	NTD S-10 DR
Unlinked Passenger Trips	125,558	160,346	157,293	NTD S-10 DR
Farebox Revenue	\$390,382	\$581,689	\$ 665,007	NTD F-10
Total Operating Costs	\$3,726,633	\$ 3,711,760	\$4,856,309	NTD F-30 DR
Passenger Miles	740,527	983,346	842,892	NTD S-10 DR
Vehicle Operations Costs	\$2,732,014	\$2,916,452	\$ 3,721,846	NTD F-30 DR
Local Support (a)	\$1,449,354	\$1,056,916	\$ 1,151,337	ECCTA Transtrack
TDA Oper. Cost Exclusions - PUC 99247 (b)	\$0	\$0	\$0	ECCTA Transtrack
TDA Oper. Cost Exclusions - PUC 99268.17 (c)	\$0	\$ 0	\$0	ECCTA Transtrack
Trips On-Time	66%	63%	87%	ECCTA Transtrack
Total Trips (Booked)	125,558	120,111	116,957	ECCTA Transtrack
Complaints	610	683	243	Year-End Quarterly Performance Reports
Missed Trips	315	417	58	ECCTA Transtrack
Total ADA Trips (Completed)	100,446	96,176	92,062	ECCTA Transtrack
ADA Trip Denials	0	0	0	ECCTA Transtrack
Trip Cancellations	19,035	18,667	20,045	ECCTA Transtrack
No Shows/Late Trip Cancellations	4,194	4,949	8,016	ECCTA Transtrack
Vehicle Maintenance Costs	\$ 638,587	\$275,381	\$ 454,847	NTD F-30 DR
Non-Vehicle/Facility Maintenance Costs	\$ 51,664	\$92,114	\$ 111,871	NTD F-30 DR
Spare Vehicles (Total less Maximum Service)	6	7	7	NTD S-10 DR
Total Vehicles	32	46	52	NTD S-10 DR
Revenue Vehicle Mechanical System Failures - Total	3	0	0	Year-End Quarterly Performance Reports
Revenue Vehicle Mechanical System Failures - Major	3	0	0	NTD R-20
Preventable Accidents	4	2	7	Year-End Quarterly Performance Reports

- (a) Local Support includes the following (USOA revenue class in parentheses):
 - Auxiliary transportation revenue (406)
 - Taxes directly levied (408)
 - · Local cash grants and reimbursements (409)
 - · Local special fare assistance (410)
 - · Subsidy from other sectors of operation (440)
 - Other non-federal/non-state grant funds or other revenues
- (b) Operating expense object classes exclusive of the following pursuant to PUC Section 99247:
 - · depreciation and amortization expenses
 - subsidies for commuter rail services operated on railroad lines under the jurisdiction of the Federal Railroad Administration
 - · costs for providing charter services
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 - principal and interest payments on capital projects funded with certificates of participation
- (c) Operating expense object class exclusions pursuant to PUC Section 99268.17:
 - additional operating costs for federally required ADA paratransit service that exceed prior year costs (CPI adjusted)
 - cost increases beyond the CPI change for. fuel, alternative fuel programs, power (including electricity), insurance premiums/liability claims payouts; state and federal mandates
 - · start-up costs for new services (not more than two years)