



INTERNAL AUDIT

Audit of Bus Operations

R-21-04

May 16, 2023

This record contains information that is classified as Protected under Utah Code 63G-2-305(10)(a); 63G-2-305(10)(b); 63G-2-305(12); 63G-2-305(16).
This record may not be released without appropriate authorization from a UTA records officer. This information is redacted.

Table of Contents

Executive Summary	3
Attachment A: Status of Preliminary Assessment Recommendations	6

Rating Matrix

Descriptor	Guide
High	Matters considered being fundamental to the maintenance of internal control or good corporate governance. These matters should be subject to agreed remedial action within three months.
Medium	Matters considered being important to the maintenance of internal control or good corporate governance. These matters should be subject to agreed remedial action within six months.
Low	Matters considered being of minor importance to the maintenance of internal control or good corporate governance or that represents an opportunity for improving the efficiency of existing processes. These matters should be subject to agreed remedial action and further evaluation within twelve months.

Distribution List

Title	For Action ¹	For Information	Reviewed prior to release
Executive Director		*	*
Chief Operating Officer		*	
Chief Financial Officer		*	
Director of Maintenance Support	*		*
Director of Talent Development		*	
Records Manager			*

¹For Action indicates that a person is responsible, either directly or indirectly depending on their role in the process, for addressing an audit finding.

Executive Summary

Introduction

The Audit Committee directed Internal Audit (“IA”) to perform an audit to determine if controls over Bus Operations are designed adequately and operating effectively to ensure compliance with federal regulations, state laws, and internal policies and procedures as well as to support the achievement of management objectives. The Audit Plan was approved by the Audit Committee on January 31, 2022.

The preliminary assessment phase was concluded on June 29, 2021 and was reported to the Audit Committee on August 23, 2021. The audit phase was completed March 20, 2023 and was conducted in accordance with the International Standards for the Professional Practice of Internal Audit, published by the Institute of Internal Auditors.

Background and Functional Overview

UTA bus services are organized into three geographical business units: Salt Lake (Andres Colman, Regional General Manager), Mt Ogden (Camille Glenn, Regional General Manager), and Timpanogos (Mary DeLaMare-Schaefer, Regional General Manager). Regional General Managers (“RGM”) are responsible for overseeing all aspects of bus operations at their locations, including the training and managing of bus operators, maintaining the fleet of buses, and ensuring reliable route service.

In 2021 UTA operated 19,278,266 vehicle miles of fixed route and demand response bus services. The current active bus fleet includes 506 service buses and 22 contingency buses which are serviced by four maintenance facilities. One of these facilities is in Ogden, three in the Salt Lake area (Central, Riverside, and Meadowbrook), and one in Orem (Timpanogos). The Riverside facility is a demand response system serving people with disabilities, which operates 114 service buses and 8 contingency buses. (UTA Bus Fleet Management Plan, 2022)

Objectives and Scope

The period of the audit phase focused on activity between August 1, 2021 to October 31, 2022.

The primary areas of focus for the audit were:

- Governance
- Vehicle Maintenance
- Operator Training and Oversight
- American with Disabilities Act (“ADA”) Compliance
- Safety

The audit phase focused on: 1) determining if any major processes have changed since the preliminary assessment 2) testing key controls identified in the preliminary assessment 3) determining the status of issues reported in the preliminary assessment.

Summary

Although we note opportunities for improvement emphasized in this report, we also observed numerous strengths, best practices, and accomplishments within UTA's Bus Operations.

Particularly praiseworthy is management's approach to preparing operators and maintenance personnel within Bus Operations for diversification of UTA's fleet. By 2040, management has a goal for 50% of the fleet to run on alternative fuels, such as compressed natural gas ("CNG") and electricity. To support this goal, management has drafted The Zero-Emission Bus Transition Plan – 2022 ("ZETP") along with the Bus Fleet Management Plan -2022 ("BFMP"). These are living documents that allow stakeholders to ensure that considerations are given to general services, maintenance practices, fleet procurement and replacement, facility assessment, and workforce development.

Facilities

The BFMP describes the resources, infrastructure, and equipment needed to support the vehicles and the associated changes to existing facilities. The BFMP also includes facility assessments and future expansions.

The Ogden Bus Rapid Transit ("BRT") is currently utilizing chargers for new electric buses as of Fall of 2022. The full BRT line from Ogden Transit Center to McKay-Dee Hospital in Ogden is expected to be completed in August 2023.

As of November 2022, four maintenance bays have been added to the Mt Ogden Business Unit maintenance building to service CNG vehicles. Additional electric charging infrastructure is available in Mt Ogden's vehicle yard.

In line with UTA's transit development plan, a new Depot District Clean Fuels Technology Center ("DDCFTC") maintenance facility was recently opened south of UTA headquarters ("FLHQ"). The facility has the capacity to store, operate, maintain and service its current fleet and the addition of more CNG and electric buses.

The DDCFTC will replace the existing nearly 50-year-old Central bus garage which managements stated in the BFMP is at the end of its useful life. The new facility will provide support in administration, operations, maintenance, and parking for 150 buses (alternative and standard fuel buses to meet short-term and 2040 needs) and expandable to 250. It will support the future alternative fuel fleet with chargers for electrical buses. Management states that "it will speed the transition of UTA's bus fleet to alternative fuel technologies that utilize locally produced CNG" (BFMP, 2022).

Vehicles

UTA's goal is to replace buses on a 12 to 14-year cycle on transit buses, and 18 years on commuter buses. The actual replacement schedule is driven by the availability of funding while ensuring continued safe and reliable service. The type of technology and/or propulsion type is evaluated on a year-to-year basis and will be dependent on grant funding availability.

The vehicle replacement plan as of May 2022 is available in the ZETP. This plan includes service expansions which are currently in progress. The plan reflects UTA's intention to move toward utilizing alternative fuel vehicles.

Workforce

UTA's Managers of Vehicle Performance and Maintenance are aware of UTA's electrification and how their maintenance Technicians can be supported in successfully adapting to working on alternative fuel vehicles. Trainers have already been selected to undergo training offered by Weber State University early in 2023. Their education will be invaluable to designing future technician training. UTA's Maintenance Managers recognize that UTA's electrification success will be dependent on their deliverables.

IA noted opportunities to implement stronger controls for emergency management practices. Accessibility on UTA fixed routes is continually being improved with targeted changes to standard operating procedures ("SOP"), training, and communication.

In addition to the review of the status of the Preliminary Assessment Recommendations, IA determined the following through audit testing:

- Inspections are completed on Bus Operations vehicles.
- Up-to-date Utah Highway Patrol Vehicle Safety stickers are displayed in vehicle windows.
- Operators' shifts are tracked and scheduled to have a minimum of 8 hours in between shifts.
- Management's tracking of customer concerns and feedback is lower than previous years (excluding 2020).

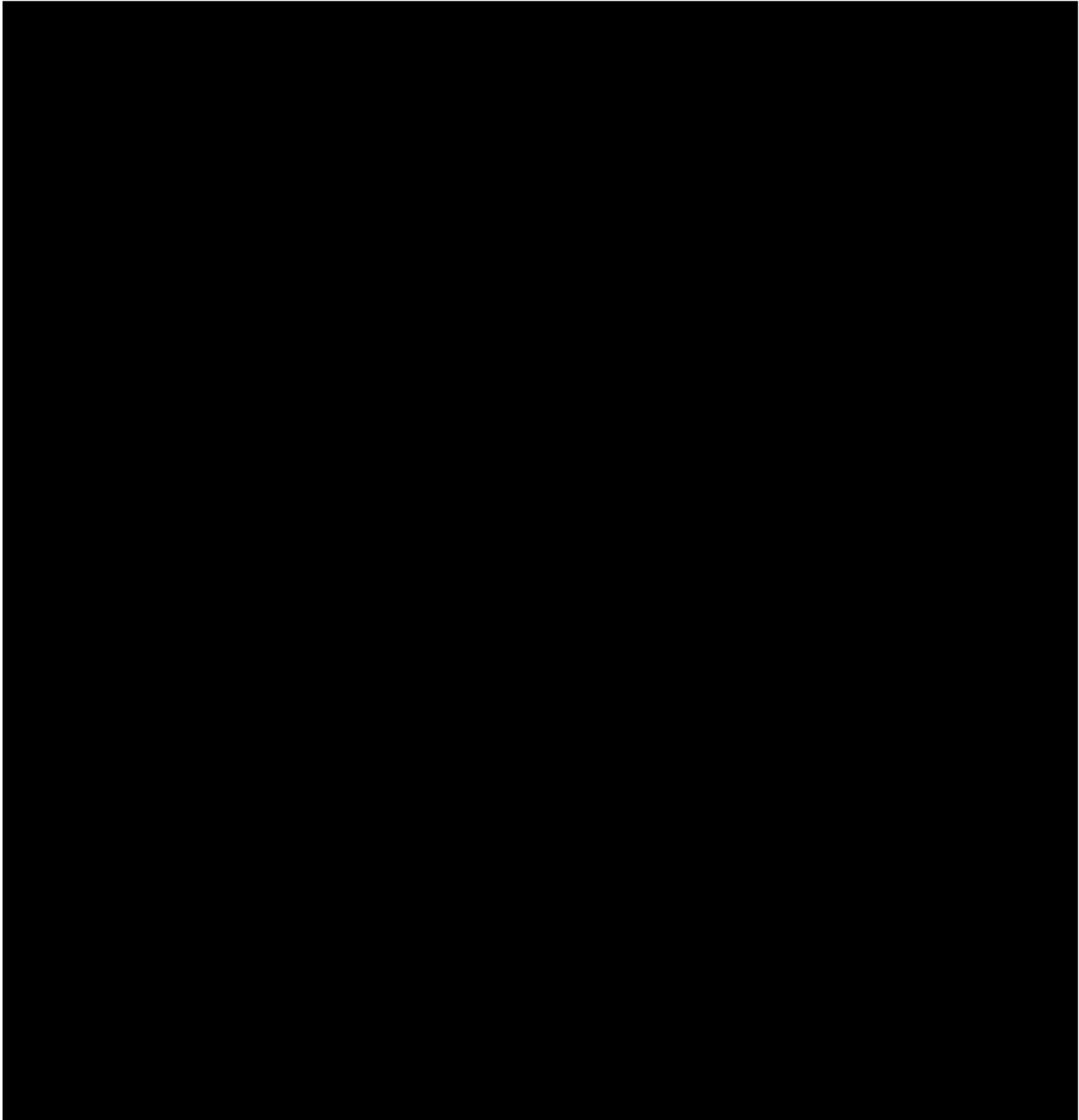
IA appreciates the assistance offered by Bus Operations management and staff in completing this audit.

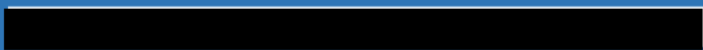
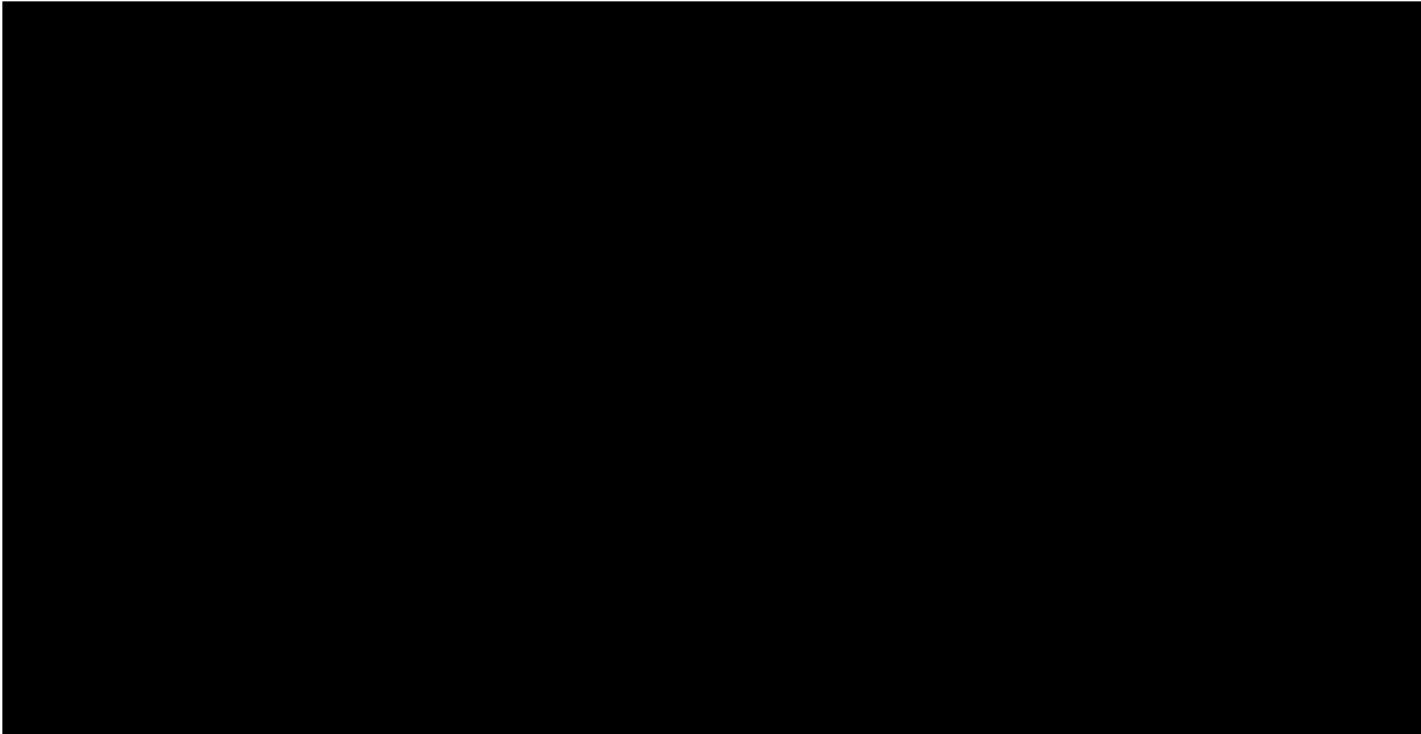
Attachment A: Status of Preliminary Assessment Recommendations

[Redacted]

Risk Level: Medium

Audit Status



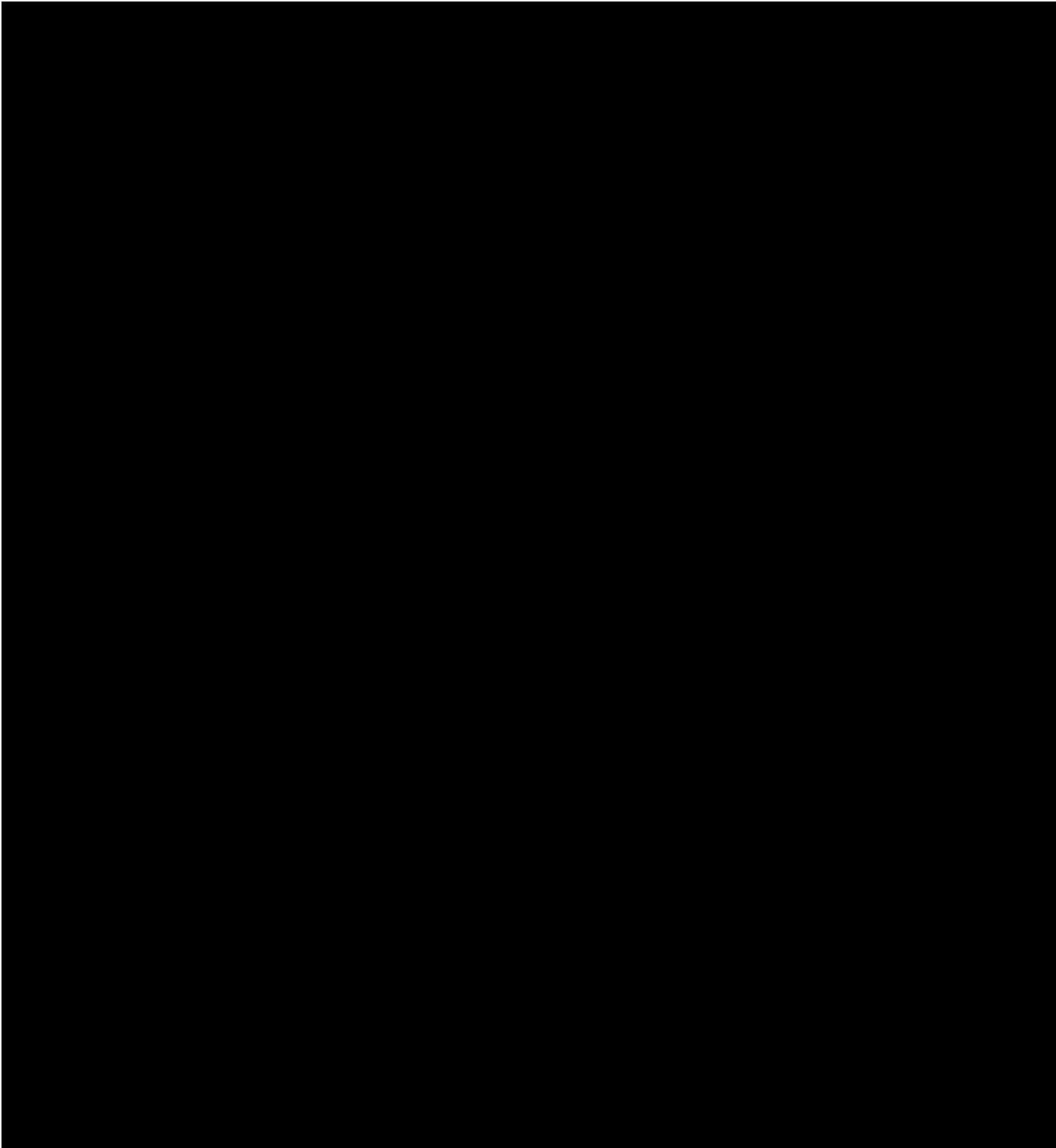


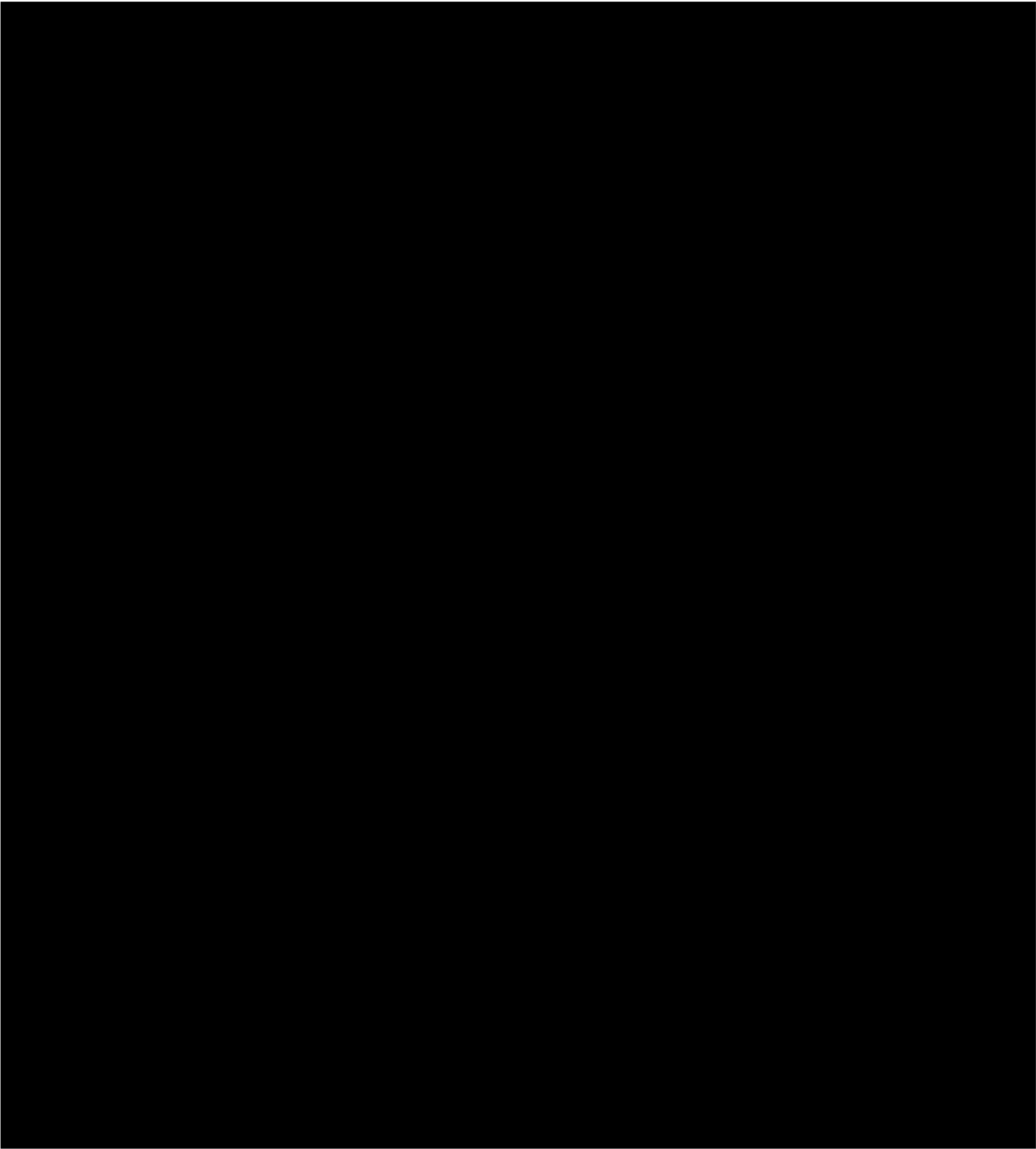
Risk Level: Low

Audit Status



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Audit Status**Details:**

UTA bus operators are responsible for physically securing customer's mobility devices. New operators are trained on how to correctly secure mobility devices.

Inquiry with UTA's ADA Compliance Officer suggested that securement training could be strengthened with the requirement that refresher training be offered bi-annually in conjunction with already required sensitivity training.

To support the validity of this idea, customer complaints from 1/1/2020 – 6/15/2021 were reviewed for instances of customer complaints related to securement issues or operator insensitivity. 188 instances were noted. These instances point to an opportunity to improve securement and sensitivity training, though it must be noted that complaints are, by nature, subject to a person's viewpoint, and without further evidence no more should be made of the complaints.

Further discussion with Management indicated refresher training specific to securement was not necessary due to the repetitive nature of the task.

Criteria:

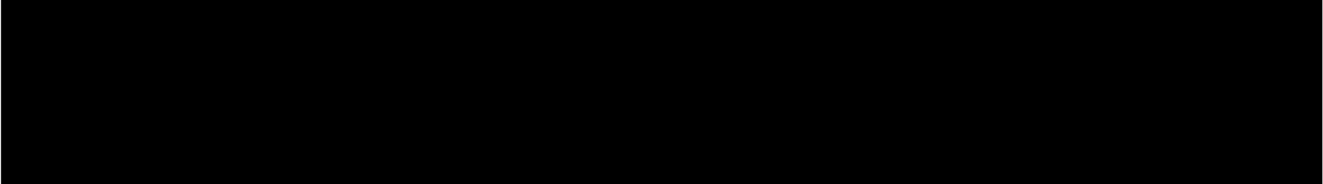
The Americans with Disabilities Act, section 37.165 states,

"The entity's personnel have an obligation to ensure that a passenger with a disability is able to take advantage of the accessibility and safety features on vehicles. Consequently, the driver or other personnel must provide assistance with the use of lifts, ramps, and securement devices. For example, the driver must deploy the lift properly and safely. If the passenger cannot do so independently, the driver must assist the passenger with using

the securement device. On a vehicle which uses a ramp for entry, the driver may have to assist in pushing a manual wheelchair up the ramp (particularly where the ramp slope is relatively steep). All these actions may involve a driver leaving his seat. Even in entities whose drivers traditionally do not leave their seats (e.g., because of labor-management agreements or company rules), this assistance must be provided. This rule overrides any requirements to the contrary."

Underlying Cause:

- Some passengers resist being secured resulting in complaints.



Recommendations:

Require refresher training on the requirement to secure passengers. The refresher training can be incorporated as part of annual sensitivity training. Retrain specific operators following securement complaints or accidents as appropriate to the nature of the complaint or accident.

Management Response and Action Plan

██████████ will work with the ADA Compliance Manager to develop and implement computer-based training for mobility device securement. Operators are currently provided training as part of the normal beginning orientation/training. However, on a complaint basis, Operators may be retrained in securing passengers.

Target Completion Date: June 30, 2022

Current Status: Closed

Communications with ██████████ Training personnel confirmed that the development of the computer-based training is to begin on March 30, 2023. This issue will be considered partially remediated. Once the training is developed and available to Operators for any retraining purposes this finding will be considered closed.

Preliminary Assessment Finding R-21-05 Standard Operating Procedure Updates Risk Level: Low

Audit Status

Details:

Standard operating procedure (SOP) BO 1.09 "Serving Customers with Disabilities" (BO 1.09) was adopted by management to instruct operators on accessibility procedures. Internal Audit noted several opportunities for the SOP to updated or strengthened:

- The definition of service animals is not aligned with UTA policy 6.1.1. The later restricts the

definition of service animals to only include animals trained to provide a specific task, while BO 1.09 has an expansive definition that includes emotional support animals. UTA policy 6.1.1 is aligned with the ADA definition of service animals.

- UTA recently updated the policy for personal care attendants (PCA) paying fare, making BO 1.09 out of date on this topic. Previously, a PCA could ride for free while attending to a person with disabilities. That policy was modified in October 2020 to state that customers with a disability had to be preapproved for a PCA through the reduced fare card program. The customer would have a card indicating a PCA was approved and with this card no fare would be collected for the PCA.
- UTA new employee orientation includes sensitivity training for appropriate language to use when talking to and about people with disabilities. BO 1.09 could be strengthened by including these core principles and referencing available training materials.
- BO 1.09 instructs operators to contact Transit Communications Center (TCC) if a customer with a disability needs to be denied because of a lack of securement stations. Practices would be strengthened by expanding this to include service denials due to a lack of priority seating. TCC should report any service denials to the ADA Compliance Officer.
- SOP ownership should be collaborative with the ADA Compliance Officer.

Criteria:

UTA Corporate Policy No. 1.1.2, “Creation, Revision, Retention, and Distribution of Policies and Procedures” Section III.D states,

"All Corporate Policies, Business Unit Policies, and SOPs will be:

- a. Consistent with federal and state laws and regulations;*
- b. Consistent with UTA Board Ordinances, Policies and Resolutions; and*
- c. Consistent with other Corporate Policies."*

Underlying Cause:

B 1.09 was last updated in October 2019. Changes to policy have occurred since that update.

Potential Risks:

- Operators may be unaware of procedures and best practices for serving customers with disabilities.
- Operators may be faced with conflicting guidance.
- UTA may fail to provide accessible services according to legal requirements.

Recommendations:

BO 1.09, "Serving Customers with Disabilities" should be updated with the following changes:

1. Align definition of service animals with UTA policy 6.1.1.
2. Align Personal Care Attendant language with recent fare policy changes.
3. Include a section discussing appropriate language when talking to/about people with disabilities.
4. Expand the description of situations where service might be denied to include instances where customers are denied priority seating. These instances should be reported to TCC.

5. The SOP should require that TCC provide monthly reports to the ADA Compliance Officer of call-ins related to service denials.
6. SOP ownership should be collaborative with the ADA Compliance Officer.

Management Response and Action Plan

Ogden Business Unit is preparing a revision of this SOP and we expect a revised copy to be reviewed by all business units by Oct. 31st, 2021, and then forwarded to the RGMs for review and implementation.

Target Completion Date: December 31, 2021

Current Status: Closed

Bus Operations management has confirmed that the SOP: BO 1.9 Serving Customers with Disabilities is currently under review for its final version. The Civil Rights Compliance Officer (ADA) has confirmed that the new SOP will cover the material listed in Internal Audit’s Preliminary Assessment Recommendations. This issue will be considered closed once SOP BO 1.9 Serving Customers with Disabilities is completed and adopted.

Preliminary Assessment Finding R-21-06 UTA GoRide Application

Risk Level: Low

Audit Status

Details:

UTA has a mobile device application (“app”) where customers can purchase and manage tickets. The auditor reviewed this app to determine what information was available to readily serve customers with disabilities. The app leads to accessibility information, but it takes several clicks out of the main menu. Service would be improved if accessibility information was linked directly on the menu.

Criteria:

The Americans with Disabilities Act, section 37.167(f) states,

“The entity shall make available to individuals with disabilities adequate information concerning transportation services. This obligation includes making adequate communications capacity available, through accessible formats and technology, to enable users to obtain information and schedule service.”

Underlying Cause:

Not applicable

Potential Risks:

- Customers with disabilities may be unable to quickly find information needed to use UTA fixed routes with ease.

Recommendations:

Accessibility information should be featured on the main menu of the GoRide application.

Management Response and Action Plan

Ryan Taylor, Special Services Business Unit RGM, will work with the Application Development team to ensure that this is incorporated in the update of this application. UTA recently hired Clevor Consulting Group to complete a 7-month study of the organization’s existing fare collection systems, including GoRide, UTA’s current mobile ticketing solution. For several reasons detailed in their final report, this consulting firm has recommended that UTA procure a new mobile wallet application as soon as possible, to replace the current mobile ticketing solution. In June, [REDACTED] briefed the Executive Team and the Board on this recommendation. Assuming that ET and the Board will decide to follow this recommendation, then we will not invest additional time/money to have Passport make any enhancements to the GoRide solution. As we move forward on the procurement of a new mobile wallet application, we will take this audit finding into consideration and include any relevant requirements in the RFP to make it as easy as possible for customers with disabilities to quickly find information needed to use UTA fixed routes with ease.

Target Completion Date: December 31, 2025

Current Status: Closed

The Special Project Manager – Fares confirmed that a new application was launched in January 2023. GoRide users have been invited to download and use the Transit app for future mobile ticketing needs. The Project Manager and Civil Rights Compliance Officer (ADA) are confident that the Transit app provides a superior customer experience. This finding will be considered closed.

Preliminary Assessment Finding R-21-07 Fuel Delivery Verification Risk Level: High

Audit Status

Details:

Discussion with Maintenance Personnel disclosed that they use [REDACTED] to monitor fuel supply, [REDACTED]

Criteria:

There is no written procedure or criteria describing fuel delivery for Bus Operations.


Underlying Cause:

There is no written procedure or criteria describing fuel delivery for Bus Operations.

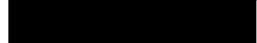
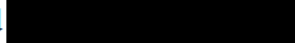
Potential Risks:

UTA may pay for fuel not delivered.

Recommendations:



Management Response and Action Plan

 Maintenance Manager, and  Maintenance Manager, are preparing a procedure for the other business units to review regarding fuel delivery. This should be completed by October 31st, 2021, and adopted by all the business units by December 31st, 2021.

Target Completion Date: December 31, 2021

Current Status: Closed

This finding was addressed in the analysis conducted in Internal Audit's 21-06 Fuel Cost. This issue will be closed.