



**San Diego Association of  
Governments (SANDAG)  
TDA Triennial Performance  
Audit  
FY2022-2024**

1

## Agenda



- ▶ Transportation Development Act Overview
- ▶ TDA Triennial Performance Audit Procedures
- ▶ SANDAG & FACT Results & Recommendations
- ▶ San Diego Metropolitan Transit System (MTS) Results & Recommendations
- ▶ North County Transit District (NCTD) Results & Recommendations

2

# Transportation Development Act



## Purpose

Funding for public transportation through state sales tax revenues



## Funding Sources

- Local Transportation Fund
- State Transportation Fund



## Enabling Legislation

Enacted 1971 via California Public Utilities Code (PUC) §§ 99200–99400



## Key Goals

- Enhance transportation planning and coordination
- Promote efficiency and effectiveness in transit service

3

# TDA Triennial Performance Audit



Under **California PUC § 99246**, a triennial performance audit must be conducted every three years to assess TDA recipients' compliance and the efficiency, effectiveness, and economy of transit operations.

## OBJECTIVES

- ▶ Evaluate Regional Transit Planning Agency (RTPA) and operator **compliance**
- ▶ Assess progress in **implementing prior audit recommendations**
- ▶ Assess **efficiency, effectiveness, and economy** of transit operations
- ▶ Provide **recommendations for improvement**

4



5

SANDAG & FACT: Summary of Results	
Audit Task	Summary of Results
Compliance with TDA Requirements	<p><b>SANDAG</b></p> <ul style="list-style-type: none"> <li>• <b>One</b> non-compliance finding out of 14 requirements assessed</li> <li>• <b>One</b> observation</li> </ul> <p><b>Facilitating Access to Coordinated Transportation (FACT)</b></p> <ul style="list-style-type: none"> <li>• <b>Two</b> non-compliance findings out of 20 requirements assessed</li> </ul>
Prior Audit Recommendation Implementation	<ul style="list-style-type: none"> <li>• <b>Two</b> of three <b>fully implemented</b></li> <li>• <b>One</b> of three <b>partially implemented</b></li> </ul>
Functional Review	<ul style="list-style-type: none"> <li>• <b>Four</b> observations related to operational effectiveness</li> </ul>

6

# SANDAG: Compliance with TDA Requirements



## DETAILED RESULTS

### Finding – 01:

Prior Triennial Performance Audit submitted late without approved extension.

### Observation – 01:

Lack of outcome-based performance metrics in FACT's quarterly reporting.



## RECOMMENDATIONS

### Finding – 01:

Develop and implement formal procedures to ensure timely submission of future triennial performance audits.

### Observation – 01:

Require FACT to incorporate outcome-based performance indicators, such as call responsiveness and trip fulfillment rates.

7

# FACT: Compliance with TDA Requirements



## DETAILED RESULTS

### Finding – 02:

Untimely submission of annual operations report.

### Finding – 03:

Late submission of the FY24 fiscal audit without approved extension.



## RECOMMENDATIONS

### Finding – 02:

Use a compliance calendar, assign monitoring roles, and formalize extension request procedures.

### Finding – 03:

Assign tracking responsibility and integrate into compliance calendar.

8

# SANDAG: Prior Audit Recommendation Implementation



Prior Recommendation	Status	Evidence of Implementation
<b>01. Annual Review of Policy No. 27 &amp; TDA Manual</b>	<b>Partially Implemented</b>	<ul style="list-style-type: none"> <li>Updates made, but formal review process still needed</li> </ul>

9

# SANDAG: Functional Review



DETAILED RESULTS	RECOMMENDATIONS
<p><b>Observation – 02:</b>  <b>RTPA Administration &amp; Management</b>                      No centralized system to track employee training activities</p>	<p><b>Observation – 02:</b>  <b>RTPA Administration &amp; Management</b>                      Implement a centralized training management system</p>
<p><b>Observation – 03:</b>  <b>Transportation Planning &amp; Regional Coordination</b>                      No performance monitoring framework specific to the RTP component of 2021 Regional Plan</p>	<p><b>Observation – 03:</b>  <b>Transportation Planning &amp; Regional Coordination</b>                      Establish a performance monitoring framework</p>
<p><b>Observation – 04:</b>  <b>Marketing &amp; Transportation Alternatives</b>                      No centralized tool or dashboard to document and track active marketing campaigns</p>	<p><b>Observation – 04:</b>  <b>Marketing &amp; Transportation Alternatives</b>                      Use a centralized dashboard for tracking</p>
<p><b>Observation – 05:</b>  <b>Grant Applications &amp; Management</b>                      Uses basic Excel tracking for complex grants</p>	<p><b>Observation – 05:</b>  <b>Grant Applications &amp; Management</b>                      Implement grant management tracking system</p>

10



11

<div style="display: flex; justify-content: space-between; align-items: center;"> <span style="font-size: 24px; font-weight: bold;">MTS: Summary of Results</span> </div>	
Audit Task	Summary of Results
<b>Compliance with TDA Requirements</b>	• <b>Three</b> non-compliance findings out of 9 requirements assessed
<b>Prior Audit Recommendation Implementation</b>	• <b>One</b> of one <b>fully implemented</b>
<b>Functional Review</b>	• <b>One</b> finding identified
<b>Verification and Use of Perf. Indicators</b>	• No findings or observations identified

12

# MTS: Compliance with TDA Requirements



## DETAILED RESULTS

- Finding – 01:**  
Lack of required compliance certification in annual audit reports.
- Finding – 02:**  
Lack of required TDA claims statement related to service and transfer coordination.
- Finding – 03:**  
Lack of submission and approval of retirement plan to SANDAG.



## RECOMMENDATIONS

- Finding – 01:**  
Include in the scope of work for future audit procurements a requirement for the auditor to assess TDA compliance.
- Finding – 02:**  
Ensure all future TDA claim submissions include the required statement.
- Finding – 03:**  
Submit retirement system funding plan to SANDAG for formal review and approval

# MTS: Functional Review



## DETAILED RESULTS

- Finding – 04:**  
Does not use standard TDA definition of FTE when reporting data to SANDAG



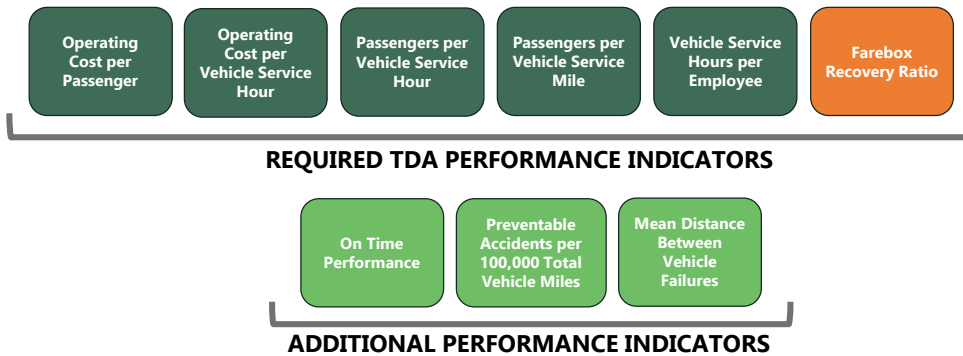
## RECOMMENDATIONS

- Finding – 04:**  
Ensure FTE data reported to SANDAG is calculated using the TDA standard definition of 2,000 hours per FTE

# MTS: Performance Indicator



MTS is stabilizing post-pandemic with meaningful ridership recovery and operational efficiencies, but sustained cost inflation, farebox pressures, and workforce challenges remain strategic priorities.



15



16

# NCTD: Summary of Results



Audit Task	Summary of Results
<b>Compliance with TDA Requirements</b>	<ul style="list-style-type: none"> <li>• <b>Two</b> non-compliance findings out of 9 requirements assessed</li> <li>• <b>One</b> observation</li> </ul>
<b>Prior Audit Recommendation Implementation</b>	<ul style="list-style-type: none"> <li>• <b>One</b> of one <b>partially implemented</b></li> </ul>
<b>Functional Review</b>	<ul style="list-style-type: none"> <li>• No findings or observations identified</li> </ul>
<b>Verification and Use of Perf. Indicators</b>	<ul style="list-style-type: none"> <li>• No findings or observations identified</li> </ul>

17

# NCTD: Compliance with TDA Requirements



DETAILED RESULTS	RECOMMENDATIONS
<p><b>Finding – 01:</b> Lack of executed contracts of operators in TDA claims.</p> <p><b>Finding – 02:</b> Lack of submission and approval of retirement plan to SANDAG</p> <p><b>Observation – 01:</b> Lack of clarity regarding required compliance certification in annual audit reports.</p>	<p>➤ <b>Finding – 01:</b> Ensure all future TDA claim submissions include the required executed contracts.</p> <p>➤ <b>Finding - 02 :</b> Submit retirement system funding plan to SANDAG for formal review and approval</p> <p>➤ <b>Observation – 01:</b> Ensure external auditor clearly identifies relevant TDA regulations within the body of future reports</p>

18

# NCTD: Prior Audit Recommendation Implementation



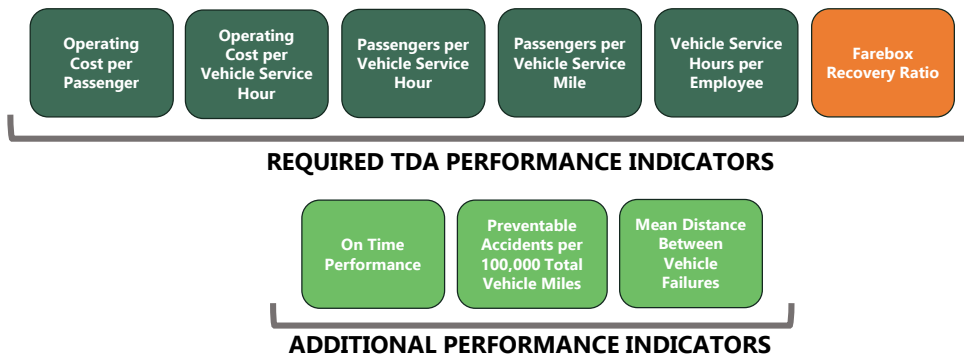
Prior Recommendation	Status	Key Action Taken
<b>01. Annual Review of Policy No. 27 &amp; TDA Manual</b>	<b>Partially Implemented</b>	Has made progress by including farebox recovery ratios in its FY2022 Annual Comprehensive Financial Report, but has not fully addressed the broader recommendation related to regional alignment

19

## NCTD: Performance



NCTD is regaining riders and improving efficiency, but rising costs, uneven service reliability, and elevated safety incidents highlight the need for sustained investment in fleet renewal, workforce stability, and revenue recovery.



20



## Brandon Tanous

Partner, Governance, Risk,  
and Compliance  
brandon.tanous@weaver.com  
832-320-3275

## Holly Hart

Director, Governance, Risk, and  
Compliance  
holly.hart@weaver.com  
972-448-9800

21



## Appendix A: Detailed Performance Audit Procedures Performed

22

# Audit Procedures Performed



## Compliance Review

MTS, NCTD, SANDAG, and FACT

- **Reviewed** and **evaluated** compliance documentation and data
- **Interviewed** operation staff to gather additional information related to maintaining and documenting compliance
- **Documented** areas of compliance and non-compliance along with validation of results

## Prior Performance Audit Follow-Up

MTS, NCTD, and SANDAG

- **Obtained** and **reviewed**:
  - Two prior TDA performance audits
  - Advice/reports issued by RTPE productivity committee
  - Fiscal audit management letter recommendations
- **Interviewed** operator and RTPE staff to gather additional information related to performance of follow-up actions
- **Documented** implementation status of recommendations and evidence of recommendation implementation and of those that remain in-progress

## Operator Functions Review

MTS and NCTD

- **Analyzed** operator functions such as mode of service, type of service, and number of peak vehicles operated
- **Reviewed** documents such as annual report, transit plans, etc.
- **Focused** on resource commitment and level of management direction and control within a function, observations of efficiency and effectiveness, and whether function is performed by operator or contractor

23

# Audit Procedures Performed



## Verification and Use of Performance Indicators

MTS & NCTD

- **Assessed** internal controls around data collection and validation
- **Tested** data collection methods
- **Calculated** performance indicators to source data and data submitted to NTD
- **Evaluated** and assessed performance indicator results for current period against previous triennial period

## Review of RTPA Functions

SANDAG

- **Reviewed** supporting documentation and **interviewed staff** related to RTPE administration & management, transportation planning & regional coordination, claimant relationship and oversight, marketing and transportation alternatives, and grant applications & management
- **Documented** results of processes identified and **assessed** for sufficiency in meeting strategic plans and objectives

24

## Appendix B: Detailed Results of MTS and NCTD Performance Indicator Evaluation Procedures

25

## MTS: Required Performance Indicators

Verified TDA Statistic	Prior Audit Period			Current Audit Period			Percent Change FY 2022-2024	CAGR FY 2019-2024
	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024		
<b>Verified TDA Statistic</b>								
Operating Cost	\$ 267,034,436	\$ 281,737,681	\$ 300,828,674	\$ 307,114,579	\$ 344,746,980	\$ 369,057,313	20.2%	5.5%
Total Passengers	85,367,919	71,245,493	39,214,848	57,616,329	68,511,362	75,682,800	31.4%	-2.0%
Vehicle Service Hours	2,300,891	2,195,244	2,166,366	2,226,776	2,111,925	2,261,278	1.5%	-0.3%
Vehicle Service Miles	34,225,746	32,937,391	32,665,180	34,726,875	34,095,978	35,936,428	3.5%	0.8%
Number of Employees (FTEs)		2,522	2,389	2,317	2,356	2,493	7.6%	-0.2%
<b>Verified TDA Key Performance Indicator</b>								
Operating Cost per Passenger Trip	\$ 3.13	\$ 3.95	\$ 7.67	\$ 5.33	\$ 5.03	\$ 4.88	-8.5%	7.7%
Operating Cost per Vehicle Service Hour	\$ 116.06	\$ 128.34	\$ 138.86	\$ 137.92	\$ 163.24	\$ 163.21	18.3%	5.8%
Passengers per Vehicle Service Hour	37.1	32.5	18.1	25.9	32.4	33.5	29.4%	-1.7%
Passengers per Vehicle Service Mile	2.5	2.2	1.2	1.7	2.0	2.1	26.9%	-2.8%
Vehicle Service Hours per Employee		870	907	961	896	907	-5.6%	0.8%
<b>Contextual Economic Measures</b>								
Consumer Price Index (U.S. BLS; San Diego-Carlsbad, CA; all urban)	2.35%	1.50%	5.21%	7.71%	5.11%	3.12%	15.9%	-3.7%
Producer Price Index (U.S. BLS; national; all transportation industries)	2.79%	-3.32%	8.61%	17.27%	-1.98%	-4.00%	11.3%	3.2%

Principal Sources: SANDAG, "Form C\_NCTD\_MTS\_Q4 2024.xlsx"; MTS, agency provided Excel files for FTE documentation

- A** - Operating cost per passenger trip **decreased** 8.5% in the current period
- B** - Operating cost per vehicle service hour **increased** 18.3% in the current period
- C** - Passengers per vehicle service hour **increased** 29.4%, nearing pre-pandemic levels
- D** - Passengers per mile **increased** 26.9%, nearing pre-pandemic levels
- E** - Vehicle service hours per employee **decreased** 5.6%, but remained stable

26

# MTS: Required Performance Indicators – Farebox Recovery Ratio



	Prior Audit Period			Current Audit Period			Percent Change FY 2022-2024	CAGR FY 2019-2024
	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024		
<b>Verified Statistic</b>								
Operating Cost	\$ 267,034,436	\$ 281,737,681	\$ 300,828,674	\$ 307,114,579	\$ 344,746,980	\$ 369,057,313	20.2%	5.5%
NTD Definition, Farebox Revenues (passenger+organization paid fares)	\$ 92,013,612	\$ 79,461,491	\$ 47,913,392	\$ 56,146,855	\$ 67,481,023	\$ 72,228,006	28.6%	-4.0%
NTD Definition, Net Operating Cost (operating cost - NTD farebox revenues)	\$ 175,020,824	\$ 202,276,190	\$ 252,915,282	\$ 250,967,725	\$ 277,265,957	\$ 296,829,307	18.3%	9.2%
Total Passengers	85,367,919	71,245,493	39,214,848	57,616,329	68,511,362	75,682,800	31.4%	-2.0%
<b>Fare Performance Indicator</b>								
NTD Definition, Farebox Recovery Ratio	34.5%	28.2%	15.9%	18.3%	19.6%	19.6%	7.1%	-9.0%
NTD Definition, Net Cost per Passenger Trip	\$ 2.05	\$ 2.84	\$ 6.45	\$ 4.36	\$ 4.05	\$ 3.92	-10.0%	-2.0%
Mean Fare per Passenger Trip	\$ 1.08	\$ 1.12	\$ 1.22	\$ 0.97	\$ 0.98	\$ 0.95	-2.1%	-2.0%
<b>Contextual Economic Measures</b>								
Consumer Price Index (U.S. BLS; San Diego-Carlsbad, CA; all urban)	2.35%	1.50%	5.21%	7.71%	5.11%	3.12%	15.9%	3.7%
Producer Price Index (U.S. BLS; national; all transportation industries)	2.79%	-3.32%	8.61%	17.27%	-1.98%	-4.00%	11.3%	3.2%

**A** - Fare Recovery Ratio **increased** to 18.3% in FY2022, then stabilized through FY2024, reflecting a 7.1% improvement over the audit period.

**B** - However, Fare Recovery Ratio CAGR **decreased** overall by 9%

- Legislation was enacted to temporarily exempt transit agencies from meeting farebox recovery requirements, in recognition of the ridership impacts caused by the COVID-19 pandemic.

27

# MTS: Required Performance Indicators Analysis



## Efficiency gains and ridership recovery offset rising costs and farebox pressures

- ▶ **Operating Cost per Passenger Trip**  
**Decreased** despite rising operating costs. Driven by:
  - Wage and insurance cost increases offset by efficiency gains
  - Service monitoring and resource management improvements
- ▶ **Operating Cost per Vehicle Service Hour**  
**Increased** due to inflationary pressures. Driven by:
  - Wage adjustments, insurance, and maintenance costs
  - Higher costs for contracted services and energy
- ▶ **Passengers per Vehicle Service Hour**  
**Increased** as ridership rebounded. Driven by:
  - Service expansions including the Mid-Trolley extension
  - Ridership promotions and marketing campaigns
- ▶ **Passengers per Vehicle Service Mile**  
**Increased** nearing pre-pandemic levels. Driven by:
  - Expanded service coverage and improved reliability
  - Return-to-work and school travel demand growth
- ▶ **Vehicle Service Hours per Employee**  
**Decreased** slightly but remained stable overall. Driven by:
  - Workforce recruitment challenges offset by wage incentives
  - Retention and training programs supporting productivity
- ▶ **Farebox Recovery Ratio**  
**Increased** but remains below pre-pandemic levels. Driven by:
  - Pandemic ridership losses and fare subsidy programs
  - Alternate revenue initiatives and joint development projects

28

# MTS: Additional Performance Indicators Analysis



## ► On-Time Performance

- **Declined** moderately due to post-pandemic congestion but remained **above** pre-COVID levels as of January 2024. Driven by:
  - Increased traffic in urban corridors
  - Service adjustments and ridership growth
  - Bus driver strikes (May–June 2023) impacting service hours and reliability

## ► Mean Distance Between Vehicle Failures

- **Increased** systemwide over six years, especially for MTS Rail. Driven by:
  - Enhanced maintenance strategy
  - Asset lifecycle planning (acquisition, rehab, replacement)
  - Focus on reliability and cost efficiency

## ► Preventable Crashes per 100,000 Total Vehicle Miles

- Slight **increase** in preventable crashes during the audit period, most notably in MTS Access. Driven by:
  - Higher service miles and evolving traffic patterns
  - Updated safety plans (Bus in 2022, Rail in 2023)
  - Post-pandemic rebound in safety metrics nearing pre-COVID levels

# NCTD: Required Performance Indicators



	Prior Audit Period			Current Audit Period			Percent Change FY 2022-2024	CAGR FY 2019-
	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024		
<b>Verified TDA Statistics</b>								
Operating Cost	\$ 96,871,863	\$ 101,850,971	\$ 103,403,117	\$ 119,218,575	\$ 136,743,167	\$ 149,032,128	25.0%	7.4%
Total Passengers	10,382,243	8,274,282	4,457,762	5,933,932	6,688,858	7,742,033	30.5%	-4.8%
Vehicle Service Hours	555,989	534,404	503,335	496,256	481,860	518,489	4.5%	-1.2%
Vehicle Service Miles	7,936,655	7,348,261	6,986,616	7,114,217	6,946,671	7,040,765	-1.0%	-2.0%
Number of Employees (FTEs)	760	725	714	690	672	646	-6.4%	-2.7%
<b>Verified TDA Key Performance Indicators</b>								
Operating Cost per Passenger Trip	\$ 9.33	\$ 12.31	\$ 23.20	\$ 20.09	\$ 20.44	\$ 19.25	-4.2%	12.8%
Operating Cost per Vehicle Service Hour	\$ 174.23	\$ 190.59	\$ 205.44	\$ 240.24	\$ 283.78	\$ 287.44	19.6%	8.7%
Passengers per Vehicle Service Hour	18.7	15.5	8.9	12.0	13.9	14.9	24.9%	-3.7%
Passengers per Vehicle Service Mile	1.3	1.1	0.6	0.8	1.0	1.1	31.8%	-2.9%
Vehicle Service Hours per Employee	732	737	705	719	717	803	11.6%	-4.6%
<b>Contextual Economic Measures</b>								
Consumer Price Index (U.S. BLS; San Diego-Carlsbad, CA; all urban)	2.35%	1.50%	5.21%	7.71%	5.11%	3.12%	15.9%	4.0%
Producer Price Index (U.S. BLS; national; all transportation industries)	2.79%	-3.32%	8.61%	17.27%	-1.98%	-4.00%	11.3%	-

Principal Sources: SANDAG, "Form C\_NCTD\_MTS\_Q4 2024.xlsx"; Federal Transit Administration, National Transit Database, 2024 Policy Manual; North County Transit District Transit Operations Performance Report

- A** - Operating cost per passenger trip **decreased** 4.2% in the current period
- B** - Operating cost per vehicle service hour **increased** 19.6% in the current period
- C** - Passengers per vehicle service hour **increased** 24.9%, nearing pre-pandemic levels
- D** - Passengers per mile **increased** 31.8%, nearing pre-pandemic levels
- E** - Vehicle service hours per employee **increased** 11.6%, but remained stable

# NCTD: Required Performance Indicators – Farebox Recovery Ratio



Verified Statistic	Prior Audit Period			Current Audit Period			Percent Change FY 2022-2024	CAGR FY 2019-2024
	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024		
Operating Cost	\$ 96,871,863	\$ 101,850,971	\$ 103,403,117	\$ 119,218,575	\$ 136,743,167	\$ 149,032,128	25.0%	7.4%
NTD Definition, Farebox Revenues (passenger-organization paid fares)	\$ 15,529,375	\$ 12,815,386	\$ 5,463,220	\$ 8,742,131	\$ 11,282,372	\$ 11,972,416	37.0%	-4.2%
NTD Definition, Net Operating Cost (operating cost - NTD farebox revenues)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	-	-
Total Passengers	10,382,243	8,274,282	4,457,762	5,933,932	6,688,858	7,742,033	30.5%	-4.8%
<b>Fare Performance Indicator</b>								
NTD Definition, Farebox Recovery Ratio	16.0%	12.6%	5.3%	7.3%	8.3%	8.0%	9.6%	-10.9%
NTD Definition, Net Cost per Passenger Trip	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	-	-
Mean Fare per Passenger Trip	\$ 9.33	\$ 12.31	\$ 23.20	\$ 20.09	\$ 20.44	\$ 19.25	-4.2%	12.8%
<b>Contextual Economic Measures</b>								
Consumer Price Index (U.S. BLS, San Diego-Carlsbad, CA, all urban)	2.35%	1.50%	5.21%	7.71%	5.11%	3.12%	15.9%	4.8%
Producer Price Index (U.S. BLS, national, all transportation industries)	2.79%	-3.32%	8.61%	17.27%	-1.98%	-4.00%	11.3%	-

**A** - Fare Recovery Ratio **increased** to 7.3% in FY2022, then stabilized through FY2024, reflecting a 9.6% improvement over the audit period.

**B** - However, Fare Recovery Ratio CAGR **decreased** overall by 10.9%

- Legislation was enacted to temporarily exempt transit agencies from meeting farebox recovery requirements, in recognition of the ridership impacts caused by the COVID-19 pandemic.

31

# NCTD: Required Performance Indicators Analysis



## Efficiency gains and ridership recovery offset rising costs and farebox pressures

- ▶ **Operating Cost per Passenger Trip**  
**Decreased** slightly but remains above pre-pandemic levels. Driven by:
  - Rising labor, insurance, and maintenance costs
  - Early gains from insourcing and efficiency measures
- ▶ **Operating Cost per Vehicle Service Hour**  
**Increased**, outpacing inflation indices. Driven by:
  - Higher maintenance expenses for aging equipment
  - Labor and operational cost pressures
- ▶ **Passengers per Vehicle Service Hour**  
**Increased** as ridership rebounded. Driven by:
  - COASTER and LIFT service enhancements
  - PRONTO and Youth Opportunity Pass
- ▶ **Passengers per Vehicle Service Mile**  
**Increased** nearing pre-pandemic levels. Driven by:
  - Expanded service coverage and improved reliability
  - Return of leisure and youth rides
- ▶ **Vehicle Service Hours per Employee**  
**Decreased** slightly but remained stable overall. Driven by:
  - Wage increases and hiring incentives
  - Workforce recruitment and retention efforts
- ▶ **Farebox Recovery Ratio**  
**Increased** but remains below pre-pandemic levels. Driven by:
  - Ridership recovery offset by subsidy programs
  - Slow rebound in fare revenue post-pandemic

32

# NCTD: Additional Performance Indicators



## On-Time Performance

- ▶ **Mixed** results: COASTER, LIFT, and FLEX improved; BREEZE and SPRINTER declined. FLEX rose +1.2% this period but –14.2% since 2019. Performance driven by:
  - Post-pandemic congestion and 2022 operator shortages
  - Missed OTP targets under MV Transportation
  - Insourcing of bus/rail operations for better control

## Mean Distance Between Vehicle Failures

- ▶ **Increased** overall, especially for LIFT (+73%) and COASTER (+163%), with Bus stable (+8%) and SPRINTER **declining** (–19%, –79% since 2019). Performance driven by:
  - Strong preventative maintenance and coordination
  - Early bus retirements from CNG tank expiration
  - Aging SPRINTER fleet, long part lead times

## Preventable Crashes per 100,000 Total Vehicle Miles

- ▶ **Increased** +76% since 2019, especially buses; SPRINTER and LIFT declined overall but LIFT rose in FY 2023. Driven by:
  - "Bus vs. Object" accidents from poor observation
  - Contractual accident limits exceeded