



Commonwealth of Massachusetts  
Office of the State Auditor  
Suzanne M. Bump

*Making government work better*

Official Audit Report – Issued October 5, 2018

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## Franklin Regional Transit Authority

For the period July 1, 2015 through June 30, 2017





Commonwealth of Massachusetts  
Office of the State Auditor  
Suzanne M. Bump

*Making government work better*

October 5, 2018

Ms. Tina Cote, Administrator  
Franklin Regional Transit Authority  
12 Olive Street, Suite 1  
Greenfield, MA 01301

Dear Ms. Cote:

I am pleased to provide this performance audit of the Franklin Regional Transit Authority. This report details the audit objectives, scope, methodology, findings, and recommendations for the audit period, July 1, 2015 through June 30, 2017. My audit staff discussed the contents of this report with management of the agency, whose comments are reflected in this report.

I would also like to express my appreciation to the Franklin Regional Transit Authority for the cooperation and assistance provided to my staff during the audit.

Sincerely,

A handwritten signature in blue ink, appearing to read "SMBump".

Suzanne M. Bump  
Auditor of the Commonwealth

cc: Stephanie Pollack, Secretary of Transportation and Chief Executive Officer, Massachusetts Department of Transportation  
Sally Atwell, Director of Internal Special Audit, Massachusetts Department of Transportation  
Kevin O'Connor, Chair, Franklin Regional Transit Authority

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## LIST OF ABBREVIATIONS

EOAF	Executive Office for Administration and Finance
FTA	Federal Transit Administration
FRTA	Franklin Regional Transit Authority
MassDOT	Massachusetts Department of Transportation
MBTA	Massachusetts Bay Transportation Authority
RTA	regional transit authority
RTAI	Ron Turley Associates, Inc.
RTD	Rail and Transit Division

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## EXECUTIVE SUMMARY

In accordance with Section 12 of Chapter 11 of the Massachusetts General Laws, the Office of the State Auditor has conducted a performance audit of the Franklin Regional Transit Authority (FRTA) for the period July 1, 2015 through June 30, 2017. In this performance audit, we assessed certain aspects of FRTA's preventive maintenance activities related to its fleet of vehicles, including equipment and vehicles for transporting passengers with disabilities under the requirements of the Americans with Disabilities Act of 1990. We also examined FRTA's use of its non-revenue-producing vehicles, as well as its compliance with the General Laws regarding providing its financial records to the Secretary of Administration and Finance for public disclosure.

Below is a summary of our findings and recommendations, with links to each page listed.

<b>Finding 1</b> <b>Page <a href="#">11</a></b>	FRTA did not submit required financial information to the Commonwealth to be made available to the public on a searchable website.
<b>Recommendations</b> <b>Page <a href="#">12</a></b>	<ol style="list-style-type: none"><li>1. FRTA should develop formal policies and procedures for submitting this required information to the Executive Office for Administration and Finance.</li><li>2. FRTA should establish monitoring controls to ensure that the staff members assigned to this task adhere to these policies and procedures.</li></ol>
<b>Finding 2</b> <b>Page <a href="#">12</a></b>	FRTA did not properly document the use of its non-revenue-producing vehicles by its employees.

**Recommendations**  
**Page 13**

1. FRTA should establish policies and procedures, consistent with those established by the Massachusetts Department of Transportation, that require a log for all its non-revenue-producing vehicles that documents the following:
  - a. the name and driver's license expiration date of the employee who used the vehicle
  - b. the date and time the vehicle was picked up
  - c. the date and time the vehicle was returned
  - d. the vehicle's license plate number
  - e. the vehicle description
  - f. the trip's intended destination and purpose
  - g. the beginning odometer reading
  - h. the condition of the vehicle before and after use
  - i. any damage
  - j. any maintenance issues identified during use
2. FRTA should ensure that these policies and procedures include monitoring controls to ensure that they are adhered to.

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## OVERVIEW OF AUDITED ENTITY

### Regional Transit Authorities

Chapter 161B of the Massachusetts General Laws established regional transit authorities (RTAs) to provide a public transportation system under the control of municipalities. Each RTA supports a number of communities (member communities) and is governed by an advisory board composed of the chief elected officials from those communities. Chapter 161B of the General Laws gives the Commonwealth certain oversight responsibilities, and it defines the process by which RTAs may be formed or expanded within the Commonwealth, as well as the duties, powers, and limitations of these RTAs. This law also outlines the membership of RTA advisory boards and their authority to appoint administrators, approve budgets, and approve significant changes in service fares. Currently, there is a network of 15 RTAs (12 urban and 3 rural) operating in the Commonwealth, in addition to the transit services provided by the Massachusetts Bay Transportation Authority (MBTA). These RTAs serve a total of 262 cities, suburban municipalities, and rural communities outside the greater Boston area and provide transportation via buses and minibuses operated by private transit service companies. RTAs, which are locally controlled, manage their own operations but must hire private operating companies to provide their services in accordance with Chapter 161B of the General Laws.

Section 53 of Chapter 6C of the General Laws makes the Rail and Transit Division (RTD) of the Massachusetts Department of Transportation “responsible for overseeing, coordinating and planning all transit and rail matters throughout the commonwealth,” including intercity buses, the MBTA, and RTAs. RTD carries out its responsibility of providing and managing financial assistance for RTAs through its Community Transit Program Unit, which oversees the federal, state, and local programs that financially support RTAs. State appropriations for the 15 RTAs increased from approximately \$70 million in fiscal year 2014 to approximately \$80 million in fiscal years 2016 through 2018.

### The Franklin Regional Transit Authority

The Franklin Regional Transit Authority (FRTA) was established in 1978 and reports to RTD under Chapter 25 of the Acts of 2009, “An Act Modernizing the Transportation Systems of the Commonwealth.” The mission statement in FRTA’s 2015 Regional Transit Plan is as follows:

*FRTA has established a rural transit system that will improve the quality of life and enhance the economic health of the region and its residents through cost effective, accessible, safe,*

*dependable, and courteous transportation services. The RTA is committed to finding ways to assist those living in low income and low population areas so that they will have access to the same modes of transit needed to nurture independence in their later years and allow less dependency on owning a vehicle. By educating our consumers on the benefits of public transit, FRTA hopes to reduce the carbon footprint in our service area and surrounding communities.*

An administrator is responsible for day-to-day administration of the agency, which had nine full-time staff members during our audit period. FRTA’s operations are overseen by an advisory board made up of one member from each of the 41 communities<sup>1</sup> the agency serves. The advisory board is responsible for hiring an administrator, setting fares, establishing service levels, and authorizing real-estate purchases. For fiscal years 2016 and 2017, FRTA contracted with First Transit, Inc. to provide fixed-route and demand-response<sup>2</sup> transportation services, including maintenance and administrative functions.

During our audit period, FRTA’s capital fund expenditures were \$726,187 for fiscal year 2016 and \$1,251,151 for fiscal year 2017. The table below shows the types of capital fund expenditures made by FRTA.

### FRTA Capital Fund Expenditures

Type of Expenditure	Fiscal Year 2016	Fiscal Year 2017
<b>Vehicles</b>	\$ 406,945	\$ 657,176
<b>Equipment</b>	40,079	68,470
<b>Building Improvements</b>	10,994	525,505
<b>Purchase of Land for Parking Lot</b>	171,370	0
<b>Construction in Progress–Parking Lot</b>	64,556	0
<b>Computer Software</b>	32,243	0
<b>Total</b>	<u>\$ 726,187</u>	<u>\$ 1,251,151</u>

In fiscal years 2016 and 2017, FRTA received revenue from a variety of sources, including fares from riders and assistance from various federal, state, and local sources. The largest source of funding is brokerage service income,<sup>3</sup> followed by Federal Transit Administration (FTA) grants, state contract

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1. The communities are Ashfield, Bernardston, Blandford, Buckland, Charlemont, Chester, Chesterfield, Colrain, Conway, Cummington, Deerfield, Erving, Gill, Goshen, Granville, Greenfield, Hatfield, Hawley, Heath, Huntington, Leyden, Middlefield, Montague, Montgomery, New Salem, Northfield, Orange, Petersham, Phillipston, Plainfield, Rowe, Russell, Shelburne, Shutesbury, Southampton, Southwick, Warwick, Wendell, Westhampton, Whately, and Worthington.
  2. Demand-response transportation services are those that run on a flexible schedule and flexible routes based on the needs of RTA passengers with special needs.
  3. This is revenue from the Human Service Transportation Program, under which FRTA coordinates with human-service agencies to provide their clients with transportation services.



assistance,<sup>4</sup> local assessment<sup>5</sup> payments, demand-response income, and fixed-route income. The table below shows the types of funding FRTA received during the audit period.

### FRTA Operating Funding Sources

Type of Funding	Fiscal Year 2016	Fiscal Year 2017
<b>Brokerage Service Income*</b>	\$ 3,881,023	\$ 3,782,618
<b>Federal Grants</b>	1,226,101	1,293,949
<b>State Contract Assistance</b>	993,791	1,144,272
<b>Local Assessments</b>	434,247	445,100
<b>Demand-Response Income</b>	168,474	154,888
<b>Fixed-Route Income</b>	130,172	103,776
<b>Other Income†</b>	123,491	128,695
<b>Total</b>	<u>\$ 6,957,299</u>	<u>\$ 7,053,298</u>

\* Brokerage service expenses are usually fully reimbursed by the Commonwealth's Human Service Transportation Office.

† Other income includes rental fees and advertising revenue.

During our audit period, FRTA's operating costs were as follows.

### FRTA Operating Expenses

Type of Expense	Fiscal Year 2016	Fiscal Year 2017
<b>Fixed-Route Service</b>	\$ 1,574,211	\$ 1,690,904
<b>Demand-Response Service</b>	827,556	915,963
<b>Brokerage Service</b>	3,700,930	3,528,616
<b>Salaries, Taxes, and Fringe Benefits</b>	529,718	618,893
<b>Other Administrative Expenses</b>	310,446	356,625
<b>Total</b>	<u>\$ 6,942,861</u>	<u>\$ 7,111,001</u>

### Vehicle Fleet and Service Route Area

FRTA operates local fixed-route and demand-response services in the 1,100-square-mile Franklin area, serving a population of more than 103,300. It operates a network of eight local transit routes. The local fixed-route service operates five days a week, excluding holidays; weekday service runs from as early as 4:35 a.m. to 7:30 p.m.

4. Under Section 23 of Chapter 161B of the General Laws, the Commonwealth, through the Executive Office for Administration and Finance, can contract with an RTA to fund 50% of the net cost of the service the RTA provides. Known as state contract assistance, this funding is provided through the Commonwealth Transportation Fund and the Massachusetts Transportation Trust Fund.

5. Under Section 9 of Chapter 161B of the General Laws, annual local assessment payments are adjusted based on the "loss" (operating cost minus revenue) for each specific transit route and the activity and the share of that loss attributable to each town or city.

The table below shows the number of revenue-producing and non-revenue-producing vehicles<sup>6</sup> used at FRTA during the fourth quarter of fiscal year 2017.<sup>7</sup>

### Number of FRTA Vehicles

Vehicle Type	Fourth Quarter of Fiscal Year 2017
Revenue-Producing	43
Non-Revenue-Producing	5
<b>Total</b>	<b><u>48</u></b>

### Vehicle Maintenance

FRTA operates its administrative office and a maintenance facility in an approximately 17,000-square-foot building in Greenfield. At the end of our audit period, FRTA had a total of 48 vehicles in its fleet. The table below shows the types and average ages of the vehicles in FRTA’s fleet during the fourth quarter of fiscal year 2017.

### FRTA Vehicle Fleet Average Age

Make and Model	Vehicle Type	Vehicle Count	Average Age (Years)
Ford E350	Minibus	20	5
Ford E450	Minibus	12	3
International CE Series	Bus	4	7
Gillig Low Floor	Bus	3	0
Gillig Phantom High Floor	Bus	2	12
New Flyer Xcelsior	Bus	1	1
ElDorado Aero Elite	Minibus	1	11
Ford F350	Truck	2	6
Ford Escape	SUV	2	7
Honda Civic	Sedan	1	12
<b>Total</b>		<b><u>48</u></b>	

The table below shows FRTA’s fixed-route service expenses for the audit period.

6. Non-revenue-producing vehicles are light-duty vehicles for temporary use by FRTA employees for agency-related business.  
 7. The vehicle maintenance tables in this report represent the fourth quarter of fiscal year 2017. At the time of our audit, FRTA had software-generated maintenance fleet data that could be readily be reviewed and summarized by the audit team for only the fourth quarter of fiscal year 2017.

### FRTA Fixed-Route Service Maintenance and Operating Expenses

Expenses	Fiscal Year 2016	Fiscal Year 2017
Supervisor, Operator, and Dispatch Salaries	\$ 984,239	\$ 1,081,099
Mechanic Salaries	194,263	181,672
Benefits and Taxes	354,042	387,930
Office Expenses, Training, and Services	83,540	93,924
Vehicle Insurance	144,261	137,993
Fuel, Oil, and Lubricants	108,586	112,071
Parts and Contracted Repairs	71,733	146,849
Maintenance Facility Expenses	86,300	88,113
Demand-Response Operating Company Allocation*	(452,753)	(538,749)
<b>Total</b>	<b>\$ 1,574,211</b>	<b>\$ 1,690,902</b>

\* These funds were originally allocated from the fixed-route budget to the operating company, First Transit, Inc., for demand-response services.

Below are the actual mileage and maintenance costs per vehicle for the fourth quarter of fiscal year 2017.

### FRTA Vehicle Mileage and Maintenance Expenses

Make and Model	Vehicle Count	Total Mileage	Parts Cost	Average Maintenance Parts Cost per Vehicle
Ford E350	20	189,586	\$ 3,265	\$163
Ford E450	12	202,145	7,844	\$654
International CE Series	4	58,179	13,382	\$3,345*
Gillig Low Floor	3	55,873	2,371	\$790
Gillig Phantom High Floor	2	10,974	1,527	\$764
New Flyer Xcelsior	1	27,623	471	\$471
ELDorado Aero Elite	1	0 <sup>†</sup>	128	\$128
Ford F350	2	0 <sup>†</sup>	5	\$3
Ford Escape	2	0 <sup>†</sup>	0	\$0
Honda Civic	1	0 <sup>†</sup>	11	\$11
<b>Total</b>	<b>48</b>	<b>544,380</b>	<b>\$ 29,004</b>	

\* Discrepancy in total is due to rounding.

† Total mileage is not available because minimal maintenance was performed during the fourth quarter of 2017 and mileage is recorded when maintenance is performed.

FTA requires all RTAs to report to it any information related to their transit vehicle inventories or maintenance and repairs that they conduct. This information is included in FTA's National Transit Database. Until the fourth quarter of fiscal year 2017, FRTA used paper to document all of its vehicle asset and expense information and report it to FTA. However, in that quarter, FRTA began using the Ron Turley Associates, Inc. Fleet Management Software to document information and report it to FTA.

## **FRTA Community Programs**

FRTA provides demand-response transportation services to elderly and disabled citizens in the communities it serves. In a separate program, FRTA offers a half-fare fixed-route pass to veterans and active-duty military personnel.

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## AUDIT OBJECTIVES, SCOPE, AND METHODOLOGY

In accordance with Section 12 of Chapter 11 of the Massachusetts General Laws, the Office of the State Auditor has conducted a performance audit of certain activities of the Franklin Regional Transit Authority (FRTA) for the period July 1, 2015 through June 30, 2017.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Below is a list of our audit objectives, indicating each question we intended our audit to answer; the conclusion we reached regarding each objective; and, if applicable, where each objective is discussed in the audit findings.

Objective	Conclusion
1. Did FRTA maintain a cost maintenance log for each vehicle to ensure that preventive maintenance for vehicles and equipment for transporting passengers with disabilities under the requirements of the Americans with Disabilities Act of 1990 was up to date per Federal Transit Administration (FTA) guidelines?	Yes
2. Did FRTA submit all required financial records to the Commonwealth for inclusion on the Commonwealth's searchable website as required by Section 14C of Chapter 7 of the General Laws?	No; see Finding <u>1</u>
3. Did FRTA properly manage the use of its non-revenue-producing vehicles?	No; see Finding <u>2</u>

To achieve our audit objectives, we gained an understanding of FRTA's internal controls that we deemed significant to our audit objectives through inquiries and observations, and we evaluated the design of controls over cost maintenance logs, financial reporting to the Commonwealth, and non-revenue-producing vehicles.

In addition, we performed the following procedures to obtain sufficient, appropriate audit evidence to address the audit objectives.

- We analyzed the data in the Ron Turley Associates, Inc. (RTAI) Fleet Management Software maintained by FRTA, which documents all vehicle fleet maintenance and repairs, to determine

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whether all vehicles used and vehicle maintenance performed during the fourth quarter of 2017, after FRTA began using this software, were recorded in the database.

- We compared records of the mileage traveled per vehicle to records of oil changes performed during the audit period and tested to determine whether FRTA followed specific vehicles' manufacturer guidelines and the required FTA preventive maintenance guidelines. We used a fleet inventory list extracted from RTAI for the fourth quarter of 2017 and original physical maintenance work orders recorded during the rest of the audit period. We randomly selected a nonstatistical sample of 10 out of 48 vehicles. Since we used a nonstatistical sampling approach, we could not project the results of the test to the entire population.
- We extracted from the RTAI software a fleet inventory list and maintenance records for the fourth quarter of 2017. We used original maintenance work orders, as well as copies, as evidence to verify the information in the RTAI software-generated report. We reviewed a nonstatistical random sample of 31 of the 90 vehicle work orders from the fourth quarter of 2017, which we compared to the data in the RTAI software. We verified attributes of the work orders pertaining to the maintenance work performed and maintenance costs. Since we used a nonstatistical sampling approach, we could not project the results of the test to the entire population.
- We asked FRTA management about the use of non-revenue-producing vehicles and the process of lending a non-revenue-producing vehicle from the motor pool.
- We asked FRTA management whether the keys to non-revenue-producing vehicles were in the possession of the general manager of First Transit, Inc. or FRTA personnel or were left in the vehicles.
- We requested and reviewed the sign-in/sign-out log for non-revenue-producing vehicles.
- We examined the state's publicly available, searchable website, as well as FRTA's website, to determine whether they included data for FRTA expenditures, including payroll, to ensure transparency with regard to the agency's spending.

We analyzed the RTAI Fleet Management Software by performing validity and integrity tests, including testing for missing data and scanning for duplicate records. We performed a source documentation review of the original hardcopy work orders to ensure that they matched the information in the RTAI software. We determined that the data from this system were sufficiently reliable for the purposes of our audit.

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## DETAILED AUDIT FINDINGS WITH AUDITEE'S RESPONSE

### **1. The Franklin Regional Transit Authority did not submit required financial information to the Commonwealth to be made available to the public on a searchable website.**

The Franklin Regional Transit Authority (FRTA) did not submit required financial information about its operations (e.g., expenditures) to the Executive Office for Administration and Finance (EOAF) so this information could be made available to the public on a searchable website. Therefore, FRTA did not allow the Commonwealth to give the public a sufficient level of transparency regarding FRTA's operations, including its overall financial health and the nature and extent of its expenses.

#### **Authoritative Guidance**

Section 14C of Chapter 7 of the Massachusetts General Laws requires agencies, including quasi-public independent entities such as FRTA, to report their "appropriations, expenditures, grants, subgrants, loans, purchase orders, infrastructure assistance and other forms of financial assistance" to the Secretary of EOAF for inclusion on the Office of the State Comptroller's searchable website. Section 14C(e) states, "All agencies shall provide to the secretary all data that is required to be included in the searchable website not later than 30 days after the data becomes available to the agency."

#### **Reasons for Noncompliance**

In its response to our draft report, FRTA senior management stated,

*The RTAs as a group proposed a low cost alternative to their participation in this initiative, which involved publication of the financial data on the RTAs' individual websites. Chapter 7, Section 14C under clause (g) contemplates and provides for the redirection of the public from the State's Open Checkbook website to other government websites as long as each of those websites complies with the requirements of this section.*

*FRTA has made a concerted effort over the years to comply with the spirit and transparency goal of the Chapter 7, Section 14C "Open Checkbook (CTHRU)" initiative through the publication of its payroll and financial payment information, audited financial statements, and approved fiscal year budgets on its website in a searchable format. We believe the financial information currently contained on our website provides the public with a sufficient level of transparency regarding FRTA's operations, including its overall financial health and the nature and extent of its expenses. As a matter of routine, we direct public requests for FRTA's financial information to the Open Government section of our website, which in most instances satisfies the public's request for information. In those rare cases a request for information is not contained on our website, we*

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*treat it as a Public Information Request and quickly respond to the individual, generally at no cost.*

## Recommendations

1. FRTA should develop formal policies and procedures for submitting this required information to EOAF.
2. FRTA should establish monitoring controls to ensure that the staff members assigned to this task adhere to these policies and procedures.

## Auditee's Response

*The FRTA maintained the open checkbook on its website and continues to do so. In addition, the FRTA, along with all the other RTAs met with the State Comptroller's Office on Tuesday June 12, 2018 to figure a way to get the data quickly on the EOAF website. This was initially done by placing the FRTA's website URL for the open government data to be available as a link immediately. The next step to be taken is to work out the data submission time lines as even the state offices have differing schedules of submission. FRTA will develop its policy and monitoring controls once the time lines and final delivery criteria have been agreed to with the State Comptroller's Office. The FRTA is committed to open government and transparency.*

## Auditor's Reply

Based on its response, FRTA is taking measures to ensure that it properly reports this information.

## **2. FRTA did not properly document the use of its non-revenue-producing vehicles by its employees.**

FRTA did not properly document the use of its non-revenue-producing vehicles. Specifically, it had vehicle sign-out logs but did not retain all of them, and the logs did not include information such as the name and driver's license expiration date of the employee who used the vehicle, the trip's intended destination and purpose, the date and time the vehicle was picked up, the date and time it was returned, its license plate number, its description, its beginning odometer reading, its condition before and after use, any damage, and any maintenance issues identified during use, for every trip for all of its non-revenue-producing vehicles. According to FRTA management, its five non-revenue-producing vehicles were driven a combined total of 22,255 miles during the audit period. As a result of the lack of monitoring of use, there is a higher-than-acceptable risk that these vehicles may be used for non-business purposes without detection.



## Authoritative Guidance

FRTA's oversight agency, the Massachusetts Department of Transportation (MassDOT), has a Motor Vehicles Policy, No. P-D0032-01, dated October 5, 2016, regarding the use of MassDOT's non-revenue-producing vehicles by its staff. This policy requires MassDOT management to maintain a log that documents the name and driver's license expiration date of the employee who used the vehicle, the trip's intended destination and purpose, the date and time the vehicle was picked up, the date and time it was returned, its license plate number, its description, its beginning odometer reading, its condition before and after use, any damage, and any maintenance issues identified during use. Although FRTA is not required to follow this policy, it represents a best practice in vehicle fleet management that FRTA should follow because it will allow the agency to more effectively manage the maintenance and proper use of these vehicles.

In addition, Section C of the Massachusetts Statewide Records Retention Schedule states that records of "the management, repair, and use of state owned equipment, vehicles, and other property" must be retained for three years.

## Reasons for Noncompliance

FRTA management stated that the agency had a written policy, distributed to all staff members, that required employees to request the use of non-revenue-producing vehicles from the general manager of FRTA's contracted operating company, First Transit, Inc., and state their purpose for doing so. They said they believed the vehicles were adequately safeguarded from potential misuse because the general manager was the only staff member who had the keys when employees asked to sign out the non-revenue-producing vehicles. The general manager stated that in accordance with the advice of FRTA's independent accountant, the agency did not maintain a log for any vehicle whose cost had been fully depreciated in its accounting records. In addition, FRTA had not established monitoring controls to ensure that its policies and procedures for the use of non-revenue-producing vehicles were properly adhered to.

## Recommendations

1. FRTA should establish policies and procedures, consistent with those established by MassDOT, that require a log for all its non-revenue-producing vehicles that documents the following:
  - a. the name and driver's license expiration date of the employee who used the vehicle

- b. the date and time the vehicle was picked up
  - c. the date and time the vehicle was returned
  - d. the vehicle's license plate number
  - e. the vehicle description
  - f. the trip's intended destination and purpose
  - g. the beginning odometer reading
  - h. the condition of the vehicle before and after use
  - i. any damage
  - j. any maintenance issues identified during use
2. FRTA should ensure that these policies and procedures include monitoring controls to ensure that they are adhered to.

### **Auditee's Response**

*The FRTA has a vehicle log in each vehicle already tracking the information required. The FRTA will develop a written policy for its non-revenue producing vehicles that will incorporate best practices from other RTAs and MassDOT. Our written policy (and procedures) will continue to include a log for those non-revenue-producing vehicles, including date of use, name, purpose of trip, beginning and ending mileage. Our policy will include monitoring controls to ensure compliance. The development of this log will be consistent with our current policy. All employees who have the potential to operate a non-revenue vehicle have licenses on file with the FRTA and are listed on our insurance policy in addition to getting checked monthly on the [Massachusetts Office of Inspector General's] exclusion list.*

### **Auditor's Reply**

Based on its response, FRTA is taking measures to address our concerns in this area.