



# **City of El Paso, Texas**

## **Independent Accountant's Report on Applying Agreed-Upon Procedures – National Transit Database Federal Funding Allocation Data**

August 31, 2024



**City of El Paso, Texas**  
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**Year Ended August 31, 2024**

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## Independent Accountant's Report on Applying Agreed-Upon Procedures

The Honorable Mayor and Members of the City Council  
City of El Paso, Texas

We have performed the procedures enumerated in the attachment on the City of El Paso's inputs into the National Transit Database (NTD) and its compliance with the standards established by the Federal Transit Administration (FTA) in regard to the FFA-10 Form as of and for the year ended August 31, 2024. The City of El Paso, Texas (City) is responsible for its compliance with the standards established by the FTA in regard to the FFA-10 Form.

The City has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of satisfying the FTA's requirements as to whether Sun Metro (an enterprise fund of the City) complied with the standards established by the FTA for the year ended August 31, 2024. This report may not be suitable for any other purpose. The procedures performed may not address all the items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

We were engaged by the City to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the City and its transit agencies' compliance with the standards established by the FTA in regard to the FFA-10 Form. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the City and to meet our other ethical responsibilities, in accordance with relevant ethical requirements related to our agreed-upon procedures engagement.

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

**Forvis Mazars, LLP**

**Dallas, Texas  
March 3, 2025**

**City of El Paso, Texas  
Engagement Scope and Procedures  
Year Ended August 31, 2024**

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1. Obtain and read a copy of written system procedures for reporting and maintaining data in accordance with the National Transit Database (NTD) requirements and definitions set forth in 49 CFR Part 630, *Federal Register*, dated January 15, 1993, and as presented in the *2024 NTD Reporting Policy Manual*. If procedures are not written, inquire about the procedures with the personnel assigned responsibility for supervising the NTD data preparation and maintenance and report on their responses.

**Response:** Based on inquiries of City personnel, we noted that no written procedures exist related to reporting and maintaining data in accordance with NTD requirements and definitions set forth in 49 CFR Part 630, *Federal Register*, dated January 15, 1993, and as presented in the *2024 NTD Reporting Policy Manual*. However, through inquiry of City personnel responsible for coordinating NTD preparation and maintenance, we noted that those responsible for reporting to NTD represent that they are aware of the requirements set forth in 49 CFR Part 630, *Federal Register*, dated January 15, 1993, and as presented in the *2024 NTD Reporting Policy Manual* and the City follows the procedures set forth within, as they are in possession of a copy of the *2024 NTD Reporting Policy Manual*.

2. Inquire about the procedures (written or informal) with the personnel assigned responsibility for supervising the preparation and maintenance of NTD data to determine and report their response regarding:
  - The extent to which the transit agency followed the procedures on a continuous basis, and
  - Whether they believe such procedures result in accumulation and reporting of data consistent with the NTD definitions and requirements set forth in 49 CFR Part 630, *Federal Register*, January 15, 1993, and as presented in the *2024 NTD Reporting Policy Manual*.

**Response:** We performed inquiries with City personnel assigned responsibility of supervising the preparation and maintenance of NTD data and noted:

- City personnel stated they followed the procedures on a continuous basis, and
- They believe such procedures result in accumulation and reporting of data consistent with the NTD definitions and requirements set forth in 49 CFR Part 630, *Federal Register*, dated January 15, 1993, and as presented in the *2024 NTD Reporting Policy Manual*.

3. Inquire of the same personnel, from item “2” above, concerning the retention policy that is followed by the transit agency with respect to source documents supporting the NTD data reported on the Federal Funding Allocation Statistics form (FFA-10), for Total Modal Operating Expenses data (F-30, line 15, column e), Actual Vehicle Revenue Mile and Passenger Miles Traveled (S-10, lines 12 and 20, column d) and report their response as to the retention policy followed.

**Response:** We inquired of the same personnel from item “2” above concerning the retention policy that is followed by the transit agency with respect to source documents supporting the NTD data reported on the FFA-10, for Total Modal Operating Expenses data, Actual Vehicle Revenue Mile and Passenger Miles Traveled, noting that the source documents are maintained for at least the three-year requirement.

4. Based on a description of the transit agency’s procedures in items “1” and “2” above, identify the source documents which are to be retained by the transit agency for a minimum of three years. For each type of source document, randomly select three months out of the year and determine whether the document exists for each of these periods.

**Response:** Based on a description of the City’s procedures obtained in items “1” and “2” above, we identified all the source documents which are to be retained by the City for a minimum of three years. For each type of source document required, we obtained the City’s records for September 2023, December 2023, and March 2024 for the Motor Bus (MB), Demand Response (DR/DT), and Service Rail (SR) modes and determined that the documents existed.

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5. Inquire with the person responsible for supervising and maintaining the NTD data whether individuals, independent of the individuals preparing source documents and posting data summaries, review the source documents and data summaries for completeness, accuracy, and reasonableness and how often such reviews are performed, and report their response.

**Response:** We performed inquiries with the person responsible for supervising and maintaining the NTD data. Upon inquiry, we noted individuals independent of the individuals preparing source documents and posting data summaries review the source documents and data summaries for completeness, accuracy, and reasonableness on a monthly basis.

6. Select a random sample of three source document packets and report whether supervisors' signatures are present as required by the system of internal controls. If supervisors' signatures are not required, inquire and report how the supervisors' reviews are documented.

**Response:** We selected a random sample of three source document packets for the DR mode for September 2023, December 2023, and March 2024 and determined the transit agency supervisors' signatures are present as required by the system of internal controls. For the MB and SR modes, there is not a direct supervisor from the transit agency to review. Instead, the City's finance department reviews the submitted information prior to preparing the submissions of the NTD reports. We noted evidence of review via an email from the finance department indicating submission to the NTD.

7. Obtain the worksheets used by the transit agency to prepare the final data that are transcribed onto the Federal Funding Allocation Statistics form (FFA-10). Compare the data included on the worksheets to the summaries prepared by the transit agency. Recalculate the arithmetical accuracy of the summarizations.

**Response:** We obtained the worksheets utilized by the City to prepare the final data to be transcribed on the FFA-10. We compared the periodic data included on the worksheets to the periodic summaries prepared by the City. We recalculated the arithmetical accuracy of the summarizations without exception.

8. Inquire of the transit agency's procedure for accumulating and recording passenger miles traveled (PMT) data in accordance with NTD requirements with transit agency staff. Inquire and report whether the procedure used is one of the methods specifically approved in the *2024 NTD Reporting Policy Manual*.

**Response:** We performed inquiries with City personnel surrounding the City's procedure for accumulating and recording PMT.

We noted that the following methods are used for the various modes of transportation:

- MB – An alternative sampling method is used, which meets the FTA requirements of 95% confidence and + / - 10% precision. This was supported by written evidence from a qualified statistician. This method is therefore one of the acceptable methods listed in the *2024 NTD Reporting Policy Manual*.
- DR/DT – A 100% count of actual PMT is the method used, which is one of the acceptable methods listed in the *2024 NTD Reporting Policy Manual*.
- SR - A 100% count of actual PMT is the method used, which is one of the acceptable methods listed in the *2024 NTD Reporting Policy Manual*.

9. Inquire of transit agency staff the transit agency's eligibility to conduct statistical sampling for PMT data every third year. Determine whether the transit agency meets one of the three criteria that allow transit

agencies to conduct statistical samples for accumulating PMT data every third year rather than annually. Specifically:

- According to the 2020 Census, the public transit agency serves an urbanized area (UZA) of less than 500,000 of population.
- The public transit agency directly operates fewer than 100 revenue vehicles in all modes in annual maximum revenue service (VOMS) (in any size UZA).
- The service is purchased from a seller operating fewer than 100 revenue vehicles in VOMS and is included in the transit agency's NTD report.

For transit agencies that meet one of the above criteria, obtain the NTD documentation for the most recent mandatory sampling year (2024) and note if statistical sampling was conducted and if the required 95% confidence and +10% precision was used. Inquire of transit agency personnel and report about how the transit agency estimated annual PMT for the current report year.

**Response:** We inquired of City personnel and note that the City conducts statistical sampling every year for the MB, SR, and DR modes; therefore, this step is not applicable for these modes.

10. Inquire of transit agency personnel about the sampling procedure for estimation of PMT data used by the transit agency. Obtain a copy of the transit agency's working papers or methodology used to select the actual sample of runs for recording PMT data. If the average trip length was used, inquire of transit agency personnel and report whether the universe of runs was used as the sampling frame and that the methodology to select specific runs from the universe resulted in a random selection of runs. If a selected sample run was missed, determine that a replacement sample run was randomly selected. Note if the transit agency followed the stated sampling procedure.

**Response:** We inquired and obtained a description of the sampling procedure for estimation of PMT data used by the City. We obtained a copy of the City's working papers used to select the actual sample of runs for recording PMT data. The City utilizes Actual Passenger Counts (APC) rather than average trip length to estimate PMT data for the MB, SR, and DR modes. The City followed the stated sampling procedure for these modes.

11. Select a random sample of three source documents for accumulating PMT data and note if the data are complete (all required data are recorded) and the computations are accurate. Select a random sample of three of the accumulation periods and re-calculate the accumulations for each of the selected periods. List the accumulations periods that were recalculated. Recalculate the arithmetical accuracy of the summary data provided to NTD.

**Response:** For MB, DR, and SR modes, we randomly selected three source documents for accumulating PMT data for the months of September 2023, December 2023, and March 2024 and noted the source documents were complete, and computations were accurate.

12. Inquire of transit agency personnel about the procedures for systematic exclusion of charter, school bus, and other ineligible vehicle miles from the calculation of actual vehicle revenue miles and note the personnel's response. Randomly select three source documents used to record charter and school bus mileage and recalculate the arithmetical accuracy of the computations.

**Response:** Based on inquiry with City personnel, the City does not have charter, school bus, or other ineligible vehicle miles. Therefore, a method for excluding such activity is not applicable.

13. For actual vehicle revenue mile (VRM) data, document the collection and recording methodology and determine that deadhead miles are systematically excluded from the computation. This is accomplished as follows:

- If actual VRMs are calculated from schedules, inquire of transit agency personnel about the procedures used to subtract missed trips. Randomly select three of the days that service is operated and re-calculate the daily total of missed trips and missed VRMs.
- If actual VRMs are calculated from hubodometers, inquire of transit agency personnel about the procedures used to calculate and subtract deadhead mileage and note their response. Randomly select three hubodometer readings and compare the transit agency's method of computing deadhead mileage to the methods allowed by FTA's definitions. Recalculate the arithmetical accuracy of the summarizations of intermediate accumulations.
- If actual VRMs are calculated from vehicle logs, randomly select three of the vehicle logs and compare the transit agency's method of computing deadhead mileage to the methods allowed by FTA's definitions.

**Response:** For VRM data, we documented the collection and recording methodology and determined that deadhead miles are systematically excluded from the computation based on the following:

- VRM for the MB, DR and SR modes of transportation is based on schedules. We inquired with City personnel and noted that all missed trips are included in the City's data and subtracted in calculating VRM. We randomly selected three service days from the months of September 2023, December 2023, and March 2024 (9/1/23, 12/1/23, and 3/6/24) and re-calculated the total of missed trips and missed VRMs, noting no exceptions.

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

**Response:** For rail modes, we obtained the recording and accumulation sheets for actual VRM's and noted that the City does not have locomotives. Therefore, an elimination method for locomotive miles is not applicable.

15. If fixed guideway or High Intensity Bus directional route miles (FG or HIB DRM) are reported, inquire of the person responsible for maintaining and reporting the NTD data and report the personnel's response about whether the operations meet FTA's definition of fixed guideway (FG) or High Intensity Bus (HIB) in that the service is:

- Rail, trolleybus (TB), ferryboat (FB), or aerial tramway (TR) or
- Bus (MB, CB, or RB) service operating over exclusive or controlled access rights-of-way (ROW), and
  - Access is restricted,
  - Legitimate need for restricted access is demonstrated by peak period level of service D or worse on parallel adjacent highway, and
  - Restricted access is enforced for freeways; priority lanes used by other high occupancy vehicles (HOV) (i.e., vanpools (VP), carpools) must demonstrate safe operation (see Fixed Guideway Segments form (S-20))

**Response:** We inquired of the transit personnel responsible for maintaining and reporting FG directional route miles included within the NTD data and noted that the City's operations meet FTA's definition of FG and noted that FG segment as reported includes only the streetcar.

16. Inquire with the person reporting the NTD data about the measurement of fixed guideway and HIB DRM and note whether the mileage is computed in accordance with FTA's definitions of FG/HIB and DRM. Inquire whether there were service changes during the year that resulted in an increase or decrease in DRMs. If a service change resulted in a change in overall DRMs, recalculate the average monthly DRMs, and compare the total to the FG/HIB DRM reported on the FFA-10 form.

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**Response:** We inquired of City personnel and noted that the mileage is computed in accordance with FTA definitions of fixed guideway and DRM. The mileage is based on an approved FTA segment of a fixed 4.8 miles. We inquired whether there were service changes during the year that resulted in an increase or decrease in DRM. During the current year, there were no service changes resulting in a change in overall DRMs. The City does not deploy HIB.

17. Inquire if any temporary interruptions in transit service occurred during the report year. If these interruptions were due to maintenance or rehabilitation improvements to an FG segment(s), report if the following apply:

- DRMs for the segment(s) should be reported for the entire report year if the interruption is less than 12 months in duration. The months of operation on the S-20 form should be reported as 12. The transit agency should have completed a Form Note describing the interruption.
- If the improvements cause a service interruption on the FG/HIB DRMs lasting more than 12 months, the transit agency should contact their validation analyst to discuss. FTA will make a determination on how the DRMs should be reported.

**Response:** We inquired of City personnel and noted there were no interruptions lasting more than 12 months. There were no temporary interruptions due to maintenance or rehabilitation improvements.

18. Measure FG/HIB from maps or by retracing route.

**Response:** We measured FG by tracing route distances using the City's official Streetcar maps. The City does not deploy HIB.

19. Inquire with the person reporting the NTD data and report about whether other public transit agencies operate service over the same FG/HIB as the transit agency. If yes, note that the transit agency coordinated with the other transit agency (or agencies) such that the DRMs for the segment of FG/HIB are reported only once to the NTD on the FFA-10 form. Each transit agency should report the actual VRM, PMT and operating expense (OE) for the service operated over the same FG/HIB.

**Response:** We performed inquiries with City personnel reporting the NTD data whether other public transit agencies operate service over the same FG as the City noting no other public transit agencies operate service over the same FG. The City does not deploy HIB.

20. Inquire with the persons reporting the NTD data and report about the Agency Revenue Service Start Date for any segments added in the 2024 Report Year. This is the commencement date of revenue service for each FG/HIB segment. Compare the date reported to the date when the agency began revenue service. This may be later than the Original Date of Revenue Service if the transit agency is not the original operator. If a segment was added for the 2024 report year, the Agency Revenue Service Date must occur within the transit agency's 2024 fiscal year. Segments are summarized by like characteristics. Note that for apportionment purposes under the State of Good Repair (5337) and Bus and Bus Facilities (5339) programs, the 7-year age requirement for fixed guideway/High Intensity Bus segments is based on the report year when the segment is first reported by any NTD transit agency. This pertains to segments reported for the first time in the current report year. Even if a transit agency can document an Agency Revenue Service Start Date prior to the current NTD report year, FTA will only consider segments continuously reported to NTD.

**Response:** We performed inquiries with City personnel reporting the NTD data and we noted no additions in the current year.

21. Compare operating expenses listed in the FFA-10 with audited financial data, after reconciling items are removed.

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**Response:** We compared operating expenses listed in the FFA-10 with audited financial data, after reconciling items were removed, without exception.

22. If the transit agency purchases transportation services, inquire with the personnel reporting the NTD data and report about the amount of purchased transportation (PT) generated fare revenues. The PT fare revenues should equal the amount reported on the Contractual Relationship form (B-30).

**Response:** We inquired of transit personnel reporting the NTD data regarding the amount of PT generated fare revenues. The purchased transportation fare revenues equaled the amount reported on the B-30.

23. If the transit agency's report contains data for PT services and the procedures in this schedule were not applied to the PT services, obtain a copy of the Independent Auditor Statement for Federal Funding Allocation (IAS-FFA) data of the PT service. Attach a copy of the statement to the report. Note as an exception if the PT services were not included in these procedures, and the transit agency does not have an Independent Auditor Statement (IAS) for the PT data.

**Response:** The City maintains control of the scheduling process which provides the data for PT and is included in the FFA-10. As such, the Independent Auditor Statement for IAS-FFA data of the PT service is not applicable.

24. If the transit agency purchases transportation services, obtain a copy of the PT contract and note if the contract: (1) specifies the specific public transportation services to be provided; (2) specifies the monetary consideration obligated by the transit agency or governmental unit contracting for the service; (3) specifies the period covered by the contract and that this period overlaps the entire or a portion of, the period covered by the transit agency's NTD report; and (4) is signed by representatives of both parties to the contract. Inquire of the person responsible for maintaining the NTD data and report regarding the retention of the executed contract and note if copies of the contracts are retained for three years.

**Response:** We obtained a copy of the PT contract and noted that the contract: (1) specifies the specific public transportation services to be provided; (2) specifies the monetary consideration obligated by the transit agency or governmental unit contracting for the service; (3) specifies the period covered by the contract and that this period overlaps the entire, or a portion of, the period covered by the transit agency's NTD report; and (4) is signed by representatives of both parties to the contract.

We inquired of the person responsible for maintaining the NTD data regarding the retention of the executed contracts, and obtained copies of the contracts and applicable amendments, noting that contracts and modifications are retained for at least three years.

25. If the transit agency provides service in more than one UZA, or between a UZA and a non-UZA, inquire of the person responsible for maintaining the NTD data and report regarding the procedures for allocation of statistics between UZAs and non-UZAs. Obtain the FG segment worksheets, route maps and urbanized area boundaries used for allocating the statistics and compare the transit agency's allocation methods to the methods allowed by FTA's definitions.

**Response:** The City does not provide service in more than one UZA. Therefore, this procedure is not applicable.

26. Compare the data reported on the FFA-10 form to comparable data for the prior report year and calculate the percentage change from the prior year to the current year. For actual VRM, PMT or OE data that have increased or decreased by more than 10%, or FG DRM data that have increased or decreased, inquire of transit agency management, and note management's response regarding the specifics of operations that led to the increases or decreases in the data relative to the prior reporting period.

**Response:** We compared the data reported on the FFA-10, Total Model Operating Expenses (OE) data, Actual Vehicle Revenue Miles (VRM), and Passenger Miles Traveled (PMT) to comparable data for the prior report year and calculated the percentage change from the prior year to the current year. For actual VRM, PMT, or OE data that have increased or decreased by more than 10%, or FG DRM data that have increased or decreased, we inquired of City personnel, and noted the following:

For DR reporting, VMR increased more than 10% in FY2024 compared to the prior report year due to unlinked passenger trips increasing by approximately 25,000.

For SR reporting, VRM and PMT increased more than 10% in FY2024 compared to the prior report year due to service modifications to increase hours of operation to include morning service Monday - Saturday. OE increased due to increases in employee pay and overall market prices.