



SAN JOAQUIN REGIONAL TRANSIT DISTRICT

JUNE 30, 2022

TRANSPORTATION DEVELOPMENT ACT
COMPLIANCE REPORT

Focused
on YOU



SAN JOAQUIN REGIONAL TRANSIT DISTRICT

TRANSPORTATION DEVELOPMENT ACT
COMPLIANCE REPORT

JUNE 30, 2022

TABLE OF CONTENTS

Independent Accountants' Report	1
Compliance Analysis	3
Calculation of Fare Revenue and Local Support Ratios	9



INDEPENDENT AUDITORS' REPORT ON COMPLIANCE

To the Board of Directors
San Joaquin Council of Governments
Stockton, California

Report on Compliance

Opinion

We have examined management of the San Joaquin Regional Transit District's (the District) assertion that the District complied with the applicable compliance requirements of the Transportation Development Act (TDA), including Public Utilities Code Section 99245 and the California Code of Regulations Section 6664 (the Guide), for the year ended June 30, 2022. The District's management is responsible for its assertion. Our responsibility is to express an opinion on management's assertion based on our examination.

In our opinion, management's assertion that the District complied with the aforementioned requirements for the year ended June 30, 2022, is fairly stated, in all material respects.

Basis for Opinion

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether management's assertion over compliance with the specified requirements is in accordance with the criteria, in all material respects. An examination involves performing procedures to obtain audit evidence about management's assertion over compliance with the specified requirements. The nature, timing, and extent of the procedures selected depend on our judgement, including an assessment of the risks of material misstatement of management's assertion, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

Responsibilities of Management for Compliance

Management is responsible for compliance with the requirements referred to above and for the design, implementation, and maintenance of effective internal control over compliance with the requirements of laws, statutes, regulations, rules, and provisions of contracts or agreements applicable to the District's use of TDA funding.

Auditor's Responsibilities for the Audit of Compliance

Our responsibility is to express an opinion on management's assertion of compliance with the requirements described in the Guide based on our examination. We conducted our examination of compliance in accordance with attestation standards established by the American Institute of Certified Public Accountants, and the Guide. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether management's assertion about compliance with the specified requirements is fairly stated, in all material respects.



To the Board of Directors
San Joaquin Council of Governments
Stockton, California

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, and any significant deficiencies and material weaknesses in internal control over compliance that we identified during the audit.

Purpose of this Report

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the Transportation Development Act (TDA), including Public Utilities Code Section 99245 and the California Code of Regulations Section 6664. Accordingly, this report is not suitable for any other purpose.

Lance, Soll & Lughard, LLP

Sacramento, California
March 31, 2022

SAN JOAQUIN REGIONAL TRANSIT DISTRICT

**TRANSPORTATION DEVELOPMENT ACT
COMPLIANCE ANALYSIS
JUNE 30, 2022**

a. Compliance Requirement

Determine whether the San Joaquin Regional Transit District (District) was eligible to receive Transportation Development Act (TDA) and Local Transportation Fund (LTF) revenues under Public Utilities Code (PUC) Article 4, Section 99260 and Article 8, Section 99400(c), and meets the definitions of Article 1 of the TDA.

Findings

The District operates a public transportation system with a number of routes within San Joaquin County (the County) and surrounding areas and contracts with one independent contractor for the City of Escalon for public transportation services. The District meets the definitions of Article 1 of the TDA in that the District was established in 1963 under the PUC of the State of California and is responsible for financing, construction, and operations of public transportation services within the service area of the District.

Conclusion

The District was eligible to receive the LTF funds allocated to it during the year 2022.

b. Compliance Requirement

Determine whether the District is maintaining its accounts and records on an enterprise fund basis and is otherwise in compliance with the Uniform System of Accounts (USOA) and records adopted by the State Controller pursuant to PUC Section 99243. This requirement includes the submission of an Annual Report of Financial Transactions of Transit Operators to the San Joaquin Council of Governments (SJCOG) and State Controller's Office within seven months of the fiscal year-end.

Findings

The District's annual audited financial statements and Annual Report of Financial Transactions of Transit Operators are properly presented on an enterprise fund basis, which is in compliance with the USOA and records adopted by the State Controller. The Annual Report of Financial Transactions of Transit Operators was filed electronically within the required time period.

Conclusion

The District met the accounting and financial reporting requirements under PUC Section 99243.

c. Compliance Requirement

Determine whether the LTF revenues received by the District pursuant to the TDA were expended in conformance with those sections of the TDA specifying the qualifying purposes, including PUC Sections 99262 and 99263 for funds received under Article 4 and PUC Section 99400(c) of Article 8 for service provided under contract. Furthermore, determine whether State Transit Assistance (STA) Fund revenues received by the District pursuant to the TDA were expended in conformance with the sections of the California Code of Regulations (CCR) specifying the qualifying purposes including Section 6730(a) for operating costs and capital requirements, and Section 6731(b) for contracted transit services.

SAN JOAQUIN REGIONAL TRANSIT DISTRICT

**TRANSPORTATION DEVELOPMENT ACT
COMPLIANCE ANALYSIS (CONTINUED)
JUNE 30, 2022**

Findings

The District received \$29,687,761 in LTF revenues and \$0 in STA revenues for the year ended June 30, 2022. The District had \$1,274,617 of LTF deferred revenue and \$11,051,508 of STA deferred revenue at June 30, 2022. The June 30, 2022, STA deferred revenue is programmed for future capital projects. STA funds were claimed for capital and operating purposes in the amounts of \$1,413,038 and \$0, respectively. A review of the expenses of the District revealed that they were all ordinary and necessary to the operation of a public transit system.

Conclusion

Funds received by the District, pursuant to the TDA, were expended in conformance with those sections of the TDA and CCR specifying the qualifying purposes.

d. Compliance Requirement

Determine whether the funds received by the District, pursuant to the TDA, were expended in conformance with the applicable rules, regulations, and procedures of the SJCOG and were in compliance with the allocation instructions and resolutions.

Findings

The District's fiscal year 2021-22 TDA claim was properly prepared by the District in accordance with SJCOG claim guidelines. Based upon our scanning of District prepared supporting schedules and financial statements that were audited by Brown Armstrong Accountancy Corporation, it appears that the District's expenses were ordinary and necessary to the operation of a public transit system and that the District met the requirements of the SJCOG guidelines.

Conclusion

Funds received by the District pursuant to the TDA were expended in conformance with the applicable rules, regulations, and procedures of the SJCOG and were in compliance with allocation instructions and resolutions.

e. Compliance Requirement

Determine whether interest earned on funds received by the District pursuant to the TDA were expended only for those purposes for which the funds were allocated, in accordance with PUC Section 99301.

Findings

The District maintains cash and investment accounts that bear interest, including amounts held in the County cash and investment pool, which is credited to the cash accounts to ensure it is expended for transit services.

Conclusion

Interest earned by the District was properly expended only for those purposes for which the funds were allocated.

SAN JOAQUIN REGIONAL TRANSIT DISTRICT

**TRANSPORTATION DEVELOPMENT ACT
COMPLIANCE ANALYSIS (CONTINUED)
JUNE 30, 2022**

f-h. Compliance Requirement

Verify the amount of the District’s operating costs as defined by CCR Section 6611.1, the amount of fare revenues required to meet the ratios specified in CCR Sections 6633.2 and 6633.5, and the amount of the sum of fare revenues and local support required to meet the ratios specified in Section 6633.2 for the fiscal year. Verify the amount of the District’s actual fare revenues as defined by CCR Section 6611.2 and PUC Section 99205.7 for the fiscal year. Verify the amount of the District’s actual local support as defined by CCR Section 6611.3 for the fiscal year.

Findings

The District is required to maintain certain ratios by SJCOG equal to the ratios in effect during fiscal year 1978-79 according to PUC Section 99268.2, and CCR Sections 6633.2 and 6633.5. Refer to the calculation of fare revenue and local support ratios on page 8. The required and audited ratios are as follows:

	<u>Required Ratio</u>	<u>Audited Ratio</u>
Regular Services		
Fare Revenue Ratio	20.30%	20.30%
Fare Revenue and Local Support Ratio	32.00%	32.00%
Elderly and Disabled Service Revenue Ratio	10.00%	10.00%

Conclusion

The District is in compliance with the fare revenue to operating expense ratio requirements of the TDA as of June 30, 2022.

i. Compliance Requirement

Verify the maximum amount the District was eligible to receive under the TDA during the fiscal year in accordance with CCR Sections 6634 and 6649.

Findings

The maximum amount the District was eligible to receive in the fiscal year ended June 30, 2022, is calculated as follows:

Total operating costs:	<u>\$ 34,378,894</u>
Less:	
Fare revenues	(1,443,654)
Special Fares	(101,680)
Local Support	(5,705,481)
Federal Operating Assistance	<u>(5,897,779)</u>
Maximum amount eligible to be received	<u>21,230,300</u>
Total LTF and STA Revenues Received in 2021-22	<u><u>\$ 20,587,758</u></u>

SAN JOAQUIN REGIONAL TRANSIT DISTRICT

**TRANSPORTATION DEVELOPMENT ACT
COMPLIANCE ANALYSIS (CONTINUED)
JUNE 30, 2022**

Conclusion

The amount of TDA monies claimed by the District did not exceed the amount it was eligible to receive in accordance with CCR Sections 6634 and 6649.

j. Compliance Requirement

Verify the amount of the operator's expenditure limitation in accordance with CCR Section 6633.1.

Findings

The maximum amount of funds the District was eligible to receive under Article 4 of the TDA is calculated as follows:

	<u>Operating</u>	<u>Capital</u>	<u>Total</u>
2021-22 operating costs per fare revenue ratio calculation	<u>\$ 34,378,894</u>	<u>\$ 5,305,990</u>	<u>\$ 39,684,884</u>
Less:			
Federal grants	5,897,779	2,399,345	8,297,124
State transit assistance	-	1,413,038	1,413,038
	<u>\$ 5,897,779</u>	<u>\$ 3,812,383</u>	<u>9,710,162</u>
Excess of operating and capital requirements over federal grants and state transit assistance			<u>29,974,722</u>
50% limitation			<u>14,987,361</u>
Article 4 LTF operating funds received in 2021-22			<u>20,587,758</u>
Article 4 LTF funds subject to 50% limitation			<u>20,587,758</u>
Excess/(Below Limitation) Article 4 LTF funds claimed in 2021-22			<u>\$ 5,600,397</u>

Conclusion

The amount of LTF revenues claimed by the District under Article 4 exceeded the amount it was eligible to receive under CCR Section 6633.1. However, the District may be allocated additional funds if it maintains for the fiscal year, the ratio of fare revenues to operating costs. The District is in compliance with Section 99268.2 as stated in procedures f-h above.

k. Compliance Requirement

Determine whether the District's employee retirement system is in conformance with the provisions of PUC Sections 99271, 99272, and 99273.

SAN JOAQUIN REGIONAL TRANSIT DISTRICT

**TRANSPORTATION DEVELOPMENT ACT
COMPLIANCE ANALYSIS (CONTINUED)
JUNE 30, 2022**

Findings

The District's private retirement plan is expected to be fully funded over the next 30 years, including ancillary benefits, which is within the 40-year limit required by PUC Section 99271. In accordance with PUC Section 99272, the District hired an actuary to determine the annual cost of future retirement benefits of its employee retirement plan and sets aside and invests funds sufficient to provide for the payment of future retirement benefits annually. The audited financial statements of the District include the total pension liability, plan fiduciary net position, net pension liability, and funding policy adopted to eliminate the net pension liability in the retirement plan in accordance with PUC Section 99273.

Conclusion

The District's retirement plan is in conformance with PUC Sections 99271, 99272, and 99273.

I. Compliance Requirement

Determine whether the District has had a certification by the Department of the California Highway Patrol verifying that the District is in compliance with Section 1808.1 of the Vehicle Code, as required in PUC Section 99251.

Findings

The certification from the Department of the California Highway Patrol indicating that the District is in compliance with Section 1808.1 was completed within thirteen months of the claim.

Conclusion

The District appropriately received its certification from the Department of the California Highway Patrol in accordance with PUC Section 99251.

m. Compliance Requirement

In the case of an operator, verify, if applicable, its STA eligibility pursuant to PUC Section 99314.6 or 99314.7.

Findings

The Excess Operating Cost Per "Revenue Vehicle" Hour is calculated as follows:

	<u>2022</u>	<u>2021</u>
Revenue Vehicle Hours	\$ 167,116	\$ 154,680
Total Operating Expenses	34,378,894	40,275,178
Operating cost per revenue vehicle hour	206	260
CPI Change	6.37%	3.06%
Prior Year Operating cost per "revenue vehicle" hour * current year CPI % Change (A)	17	
Prior Year Operating cost per "revenue vehicle" hour + (A)	277	
Excess Operating cost per "revenue vehicle" hour	(71)	

SAN JOAQUIN REGIONAL TRANSIT DISTRICT

**TRANSPORTATION DEVELOPMENT ACT
COMPLIANCE ANALYSIS (CONTINUED)
JUNE 30, 2022**

Conclusion

The District is in compliance with PUC Section 99314.6 or 99314.7.

n. Compliance Requirement

Determine whether the District is in compliance with PUC Sections 99155 and 99155.5 related to the use of reduced fares for elderly and disabled passengers.

Findings

The District has a Discount Fare Card for qualifying personnel regardless of age or condition, elderly, persons with disabilities, and Medicare cardholders. A medical card, Department of Motor Vehicles disabled placard, special disabled license plate and driver's license, current disabled identification issued by another transit service provider, or the authorization of a licensed doctor serve as proof of disability for the reduced fare. The District provides the same service to all complying persons without regard to where they live or whether there is a car in the household.

Conclusion

The District is in compliance with PUC Sections 99155 and 99155.5.

SAN JOAQUIN REGIONAL TRANSIT DISTRICT

TRANSPORTATION DEVELOPMENT ACT
 COMPLIANCE REPORT
 CALCULATION OF FARE REVENUE AND LOCAL SUPPORT RATIOS
 JUNE 30, 2022

	Regular Services		Elderly and Disabled Services
	Fare Revenue Ratio	Fare Revenue and Local Funds Ratio	Fare Revenue and Local Funds Ratio
FARES			
Passenger fares	\$ 1,189,948	\$ 1,189,948	\$ 253,706
Special fares	101,680	101,680	-
TOTAL FARES	1,291,628	1,291,628	253,706
LOCAL FUNDS			
Measure K	5,172,264	5,705,481	-
Advertising	-	99,234	-
Non Transportation Revenue	-	416,270	-
Local property tax	-	1,279,993	-
Local for TDA-LTF	-	1,396,781	-
TOTAL LOCAL FUNDS	5,172,264	8,897,759	-
OTHER LOCAL SUPPORT			
Miscellaneous (TDA-LTF Revenues)	-	19,190,978	-
TOTAL LOCAL FUNDS AND OTHER SUPPORT	5,172,264	28,088,737	-
TOTAL FARES AND LOCAL SUPPORT	\$ 6,463,892	\$ 29,380,365	\$ 253,706
OPERATING COSTS			
Labor	\$ 12,655,199	\$ 12,655,199	\$ 278,246
Fringe benefits	9,774,544	9,774,544	194,331
Maintenance/services	3,421,774	3,421,774	212,114
Materials and supplies	2,542,393	2,542,393	82,904
Utilities	967,903	967,903	28,568
Insurance	1,009,195	1,009,195	-
Taxes	243,933	243,933	-
Purchased transportation	253,165	253,165	1,695,377
Miscellaneous	680,140	680,140	20,404
Interest	202,871	202,871	19,224
Lease payments	58,245	58,245	3,747
Other expenses	32,472	32,472	2,145
TOTAL OPERATING COSTS	\$ 31,841,834	\$ 31,841,834	\$ 2,537,060
Computed fare revenue ratio	20.30%		
Computed fare revenue and local support ratio		32.00%	10.00%
Required fare revenue ratio	20.30%	32.00%	10.00%