



# Ventura County Transportation Commission (RTPA)

TDA Triennial Performance Audit for  
FY2022/23, 2023/24, and 2024/25







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## Chapter 1 | Executive Summary

The Triennial Performance Audit of the Ventura County Transportation Commission (VCTC) covers a three-year period ending June 30, 2023<sup>35</sup>. The California Public Utilities Code requires all Regional Transportation Planning Agencies conduct an independent Triennial Performance Audit in order to be eligible for Transportation Development Act (TDA) funding.

In 2025, the VCTC selected Moore & Associates, Inc., to prepare Triennial Performance Audits of itself as the RTPA and the 10 transit operators to which it allocates TDA funding. Moore & Associates is a consulting firm specializing in public transportation. Selection of the consultant followed a competitive procurement process.

This chapter summarizes key findings and recommendations developed during the Triennial Performance Audit (TPA) of ~~the VCTC's public transit program~~ VCTC as the RTPA for the period:

- Fiscal Year 2022/23,
- Fiscal Year 2023/24, and
- Fiscal Year 2024/25.

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

The review was also conducted in accordance with the processes established by the California Department of Transportation, as outlined in the *Performance Audit Guidebook for Transit Operators and Regional Transportation Planning Entities*.

The Triennial Performance Audit includes five elements:

1. Compliance requirements,
2. Follow-up of prior recommendations,
3. Analysis of internal goal setting and strategic planning efforts,
4. Review of the RTPA's functions and activities, and
5. Findings and recommendations.

### Test of Compliance

Based on discussions with VCTC staff, analysis of program performance, and an audit of program compliance and function, the audit team presents no findings related to compliance with the TDA. **However, if it is determined that any of the outstanding operator TDA fiscal audits for FY 2024/25 were not completed by March 31, 2026, this will become a finding for VCTC as well as the individual operators as part of the final report.**



### Status of Prior Recommendations

The prior Triennial Performance Audit – completed in [April 2020<sup>3</sup>](#) by Moore & Associates, Inc. for the three fiscal years ending June 30, 2022 – included the following recommendation:

1. Implement a process for operators to assess the implementation status of performance audit recommendations to VCTC’s Transit Operations and Planning department on an annual basis.

**Status:** Implemented.

### Goal Setting and Strategic Planning

VCTC adopted a new Strategic Plan in 2023, which included a series of adopted goals and supporting strategies. Four new goals and more than 50 strategies were the product of intensive input from Commissioners, executive staff, and VCTC employees during FY 2022/23. Following the principle of, “VCTC can’t do everything, but we can do some things very well by setting priorities,” top priorities were established for the first two years of implementation (FY 2023/24 and FY 2024/25).

While VCTC is the Regional Transportation Planning Agency for Ventura County, it is not responsible for preparing the Regional Transportation Plan. As a member of the Southern California Association of Governments (SCAG), which serves as the Metropolitan Planning Organization for the region, Ventura County is included within SCAG’s Connect SoCal Plan, which serves as the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) for the six-county area. The current RTP/SCS was adopted on April 4, 2024, by SCAG’s Regional Council and spans the 25-year period between 2025 and 2050.

To supplement the RTP/SCS and provide for more focused regional planning, VCTC prepares the Ventura County Comprehensive Transportation Plan (CTP). The most recent CTP was adopted by the Commission September 5, 2025. The draft CTP also served as Ventura County’s input into the Connect SoCal 2024 Plan.

Since the beginning of the audit period, VCTC has developed goals and objectives specific to different modes and projects through regional planning efforts. These have included the Coordinated Public Transit-Human Services Transportation Plan, Transit Asset Management Group Plan, Transit Integration and Efficiency Study (TIES), County-wide Short Range Transit Plan, and Ventura County Bus Stop Assessment.

### Findings and Recommendations

Based on discussions with [City-VCTC](#) staff, analysis of program performance, and an audit of program compliance and function, the audit team presents no findings related to compliance with the TDA.

Recommendations are intended to assist in bringing the RTPA into compliance with the requirements and standards of the TDA as well as address non-compliance-related issues, challenges, or opportunities observed during the site visit and functional review. The following recommendation is presented for the Ventura County Transportation Commission.



Exhibit 1.1 Summary of Audit Recommendations

	Recommendations	Importance	Timeline
1	Submit a formal letter to Caltrans accompanying the RTPA audit and certifying completion of the operator audits, and ensure that letter is maintained for the next Triennial Performance Audit.	High	FY 2025/26



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## Chapter 2 | Audit Scope and Methodology

The Triennial Performance Audit (TPA) of Ventura County Transportation Commission covers the three-year period ending June 30, 2025. The California Public Utilities Code requires all Regional Transportation Planning Agencies conduct an independent Triennial Performance Audit in order to be eligible for Transportation Development Act (TDA) funding.

In 2025, the VCTC selected Moore & Associates, Inc., to prepare Triennial Performance Audits of itself as the RTPA and the 10 transit operators to which it allocates funding. Moore & Associates, Inc. is a consulting firm specializing in public transportation. Selection of Moore & Associates, Inc. followed a competitive procurement process.

The Triennial Performance Audit is designed to be an independent and objective evaluation of VCTC as the designated RTPA for Ventura County. Direct benefits of a triennial performance audit include providing RTPA management with information on the economy, efficiency, and effectiveness of their programs across the prior three years; helpful insight for use in future planning; and assuring legislative and governing bodies (as well as the public) that resources are being economically and efficiently utilized. Finally, the Triennial Performance Audit fulfills the requirement of PUC 99246(a) that the RTPA designate an independent entity other than itself to conduct a performance audit of its activities as well as those of each operator to whom it allocates TDA funding.

This performance audit was conducted in accordance with generally accepted government auditing standards. Those standards require that the audit team plans and performs the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for its findings and conclusions based on the audit objectives. The auditors believe the evidence obtained provides a reasonable basis for our findings and conclusions.

The audit was also conducted in accordance with the processes established by the California Department of Transportation (Caltrans), as outlined in the *Performance Audit Guidebook for Transit Operators and Regional Transportation Planning Entities*, as well as *Government Auditing Standards* published by the U.S. Comptroller General.

### Objectives

A Triennial Performance Audit has four primary objectives:

1. Assess compliance with TDA regulations,
2. Review actions taken by the RTPA to implement prior recommendations,
3. Evaluate the efficiency and effectiveness of the RTPA through a review of its functions, and
4. Provide sound, constructive recommendations for improving the efficiency and functionality of the RTPA.



## Scope

The TPA is a systematic review of performance evaluating the efficiency, economy, and effectiveness of the regional transportation planning agency. The audit of VCTC included five tasks:

1. Review of compliance with TDA requirements and regulations.
2. Assessment of the implementation status of recommendations included in the prior Triennial Performance Audit.
3. Analysis of VCTC's internal goal setting and strategic planning functions.
4. Examination of the following functions:
  - Administration and Management,
  - Transportation Planning and Regional Coordination,
  - Claimant Relationships and Oversight,
  - Marketing and Transportation Alternatives, and
  - Grant Applications and Management.
5. Recommendations to address opportunities for improvement based on analysis of the information collected and the review of the RTPA's core functions.

## Methodology

The methodology for the Triennial Performance Audit of the VCTC as the RTPA included thorough review of documents relevant to the scope of the review, as well as information contained on VCTC's website. The documents reviewed included the following (spanning the full three-year period):

- Triennial Performance Audit reports for the prior review period;
- Annual budgets;
- Audited financial statements;
- State Controller Reports;
- Agency organizational chart;
- Board meeting minutes and agendas;
- Policies and procedures manuals;
- Regional planning documents;
- Overall work plans;
- Article 8 Unmet Transit Needs documentation;
- TDA claims manual; and
- TDA and transit funding allocations to operators.

The methodology for this audit included a virtual site visit with VCTC representatives on February 17, 2026. The audit team met with Claire Grasty (Public Transit Director), Dolores Lopez (Transit Planner), Lupe Acero (Finance Director), and Vanessa Schoenewald (Programming Director), and reviewed materials germane to the triennial audit process.

The report is comprised of seven chapters divided into three sections:

1. Executive Summary: A summary of the key findings and recommendations developed during the Triennial Performance Audit process.



2. TPA Scope and Methodology: Methodology of the audit and pertinent background information.
3. TPA Results: In-depth discussion of findings surrounding each of the subsequent elements of the audit:
  - Compliance with statutory and regulatory requirements,
  - Progress in implementing prior recommendations,
  - Goal setting and strategic planning,
  - Functional review, and
  - Findings and recommendations.



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## Chapter 3 | Overview of VCTC

The Ventura County Transportation Commission is a regional transportation planning agency governed by a Commission composed of one council member from each city, all five county supervisors, two public members, and one ex-officio member appointed by the Governor of California (typically Caltrans' District 7 Director). VCTC was created in 1989 by Senate Bill 1880 as the successor agency to the Ventura County Association of Governments (VCAG). In 2004, the Commission was reorganized under Assembly Bill 2784 into its current configuration.

### Mission, Vision, and Values

VCTC's overarching purpose is to improve mobility within the County and increase funding to meet transportation needs.

- **Vision:** To keep Ventura County moving.
- **Mission:** To create a more connected, resilient, equitable and user-friendly transportation system for Ventura County.
- **Values:**
  - **Equity:** We are inclusive in our plans, practice fairness, and recognize that needs vary by region and people served.
  - **Integrity:** We serve our community, do our work with honesty, are accountable for our actions, and take responsibility for results.
  - **Service:** We serve our partners and stakeholders with excellence and teamwork, and seek innovative and reliable solutions to meet transportation and mobility needs.
  - **Sustainability:** We are mindful of the impacts of our work on the environment, the economy, and equity, for our community and the VCTC organization.

VCTC establishes transportation policies and priorities to ensure equitable allocation of federal, state, and local funds for a variety of transportation projects, including highway, transit, rail, aviation, bicycle, and pedestrian projects. VCTC's role is to build consensus, make strategic plans, obtain and allocate resources, and provide public information pertinent to Ventura County's transportation services and infrastructure. VCTC also administers a public transit program branded as VCTC Intercity.

The Ventura County Transportation Commission meets monthly on the first Friday of the month at 9:00 a.m. at Camarillo City Hall (600 Carmen Drive). The Board does not meet in August, and in months where there is a conflict with a holiday, it meets on the second Friday. This location is served by transit, including Camarillo Area Transit and VCTC Intercity Route 50 (Highway 101).

### Roles

VCTC serves many functions within the region, including:

- **Airport Land-Use Commission (ALUC).** ALUCs implement state law (Public Utilities Code) regarding airports and surrounding land-use compatibility.



- **Congestion Management Agency (CMA).** VCTC, as the designated Congestion Management Authority (CMA) for Ventura County, is responsible for coordinating land-use, transportation planning, and air quality to mitigate traffic congestion. VCTC is responsible for developing and implementing a Congestion Management System, which identifies likely areas of vehicular congestion and proffers strategies and recommendations for alleviating this congestion.
- **Consolidated Transportation Service Authority (CTSA).** VCTC is the agency responsible for coordinating programs serving the transportation needs of seniors, persons with disabilities, and other historically transit-dependent populations.
- **County Transportation Authority (CTA).** VCTC is responsible for determining the method for distributing sales tax revenue for transportation improvements, when applicable.
- **Local Transportation Authority (LTA).** As the local transportation authority, as designated by the County Board of Supervisors, VCTC may impose a transactions and use tax for transportation purposes subject to voter approval,
- **Regional Transportation Planning Authority (RTPA).** As the RTPA, VCTC is legally responsible for allocating Transportation Development Act (TDA) funds. The TDA provides two major sources of funding: Local Transportation Funds (LTF), which are derived from a one-quarter cent state sales tax, and State Transit Assistance (STA), which is derived from the statewide sales tax on diesel fuel. VCTC is required by state statutes to conduct multi-modal transportation planning, programming, and funding allocation.
- **Ventura County Service Authority for Freeway Emergencies (SAFE).** VCTC is responsible for operation and administration of roadside call boxes and freeway service patrol programs. This service is funded through a one dollar surcharge on vehicle registrations.

#### Advisory committees

- **Citizens Transportation Advisory Committee/Social Services Transportation Advisory Council (CTAC/SSTAC).** The CTAC/SSTAC advises on planning regarding Unmet Transit Needs. The committee includes two non-elected members from each city and Ventura County, two at-large members, and one representative each from Camarillo Health Care District, Commission on Human Concerns, Developmental Disability, St. John's Medical Center, Public Social Services Agency, and VCTC (as the CTSA). The CTAC/SSTAC meets quarterly (January, April, June, and September) on the second Tuesday of the month at 1:30 p.m. at the County Government Center.
- **Heritage Valley Policy Advisory Committee (HVPAC).** The HVPAC, which is one of two advisory committees for the Valley Express transit service administered by VCTC, consists of the VCTC Executive Director, VCTC Commissioners from Fillmore and Santa Paula, and the County Supervisor whose district represents Fillmore and Santa Paula. The HVPAC reviews the Valley Express budget, reviews the contract for operation of the service, and determines if service levels need adjustment. The HVPAC meets on an as-needed basis.
- **Santa Paula Branch Line Advisory Committee (SPBLAC).** The SPBLAC advises VCTC regarding usage and maintenance of the Santa Paula Branch rail line. Members include representatives of the



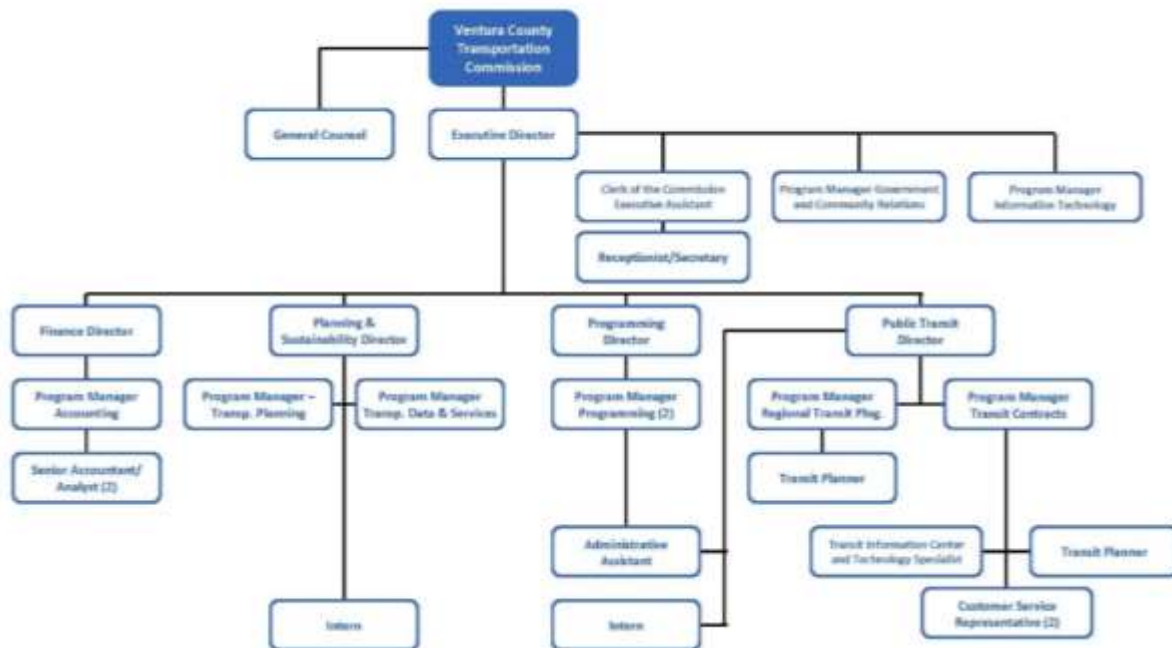
cities of Ventura, Santa Paula, and Fillmore, as well as two County Supervisors who represent areas along the SPBL. The committee meets on an as-needed basis.

- **Transit Operators Advisory Committee (Transcom).** Transcom advises VCTC on all transit-related matters including commuter rail. The committee includes one representative from each transit operator in Ventura County and one ex officio member of the Transportation Technical Advisory Committee (TTAC). Transcom typically meets the second Wednesday of the month at 1:30 p.m. at the VCTC office.
- **Transportation Technical Advisory Committee (TTAC).** TTAC advises VCTC on all technical transportation matters in the county and cities. The Committee includes one representative and one alternate from the following: Ventura County Public Works Department, each city, Oxnard Harbor District, Ventura County Air Pollution Control District, Gold Coast Transit, Southern California Association of Governments (SCAG), and Caltrans District 7. TTAC meets on the third Wednesday of the month at 1:30 p.m. at the VCTC office.

### Organization

The VCTC organizational chart (see Exhibit 3.1) includes 22 full-time positions. VCTC’s Executive Director reports to the Commission and manages four departments—Finance, Planning and Sustainability, Programming, and Transit.

Exhibit 3.1 Organizational Chart (FY 2025/26)



Source: VCTC.



During the audit period, the following individuals served as voting members of the Ventura County Transportation Commission:

- Dani Anderson, Citizen Rep, Cities (2025)
- Claudia Bill-de la Peña, City of Thousand Oaks (2022)
- Carrie Broggie, City of Fillmore (2023-2025)
- Daniel Chavez, Citizen Rep, Cities (2022-2024)
- Jenny Crosswhite, City of Santa Paula (2023-2025)
- Lynn Edmonds, City of Fillmore (2022)
- Chris Enegren, City of Moorpark (2022-2025)
- Bob Engler, City of Thousand Oaks (2023-2025)
- Suza Francina, City of Ojai (2023-2024)
- Jeff Gorell, County Supervisor (2023-2025)
- Doug Halter, City of San Buenaventura (2025)
- Robert Huber, County Supervisor (2022)
- Mike Johnson, City of San Buenaventura (2022-2024)
- Mike Judge, City of Simi Valley (2022-2025; Chair 2025)
- Rachel Lang, City of Ojai (2025)
- Matt LaVere, County Supervisor (2022-2025; Chair 2024)
- Kelly Long, County Supervisor (2022-2025)
- Vianey Lopez, County Supervisor (2023-2025)
- Bryan MacDonald, City of Oxnard (2022-2024; Chair 2023)
- Luis McArthur, City of Oxnard (2025)
- Martha McQueen-Legohn, City of Port Hueneme (2023-2025)
- Linda Parks, County Supervisor (2022)
- Janice Parvin, County Supervisor (2023-2025)
- Carmen Ramirez, County Supervisor (2022)
- Richard Rollins, City of Port Hueneme (2022)
- Andy Sobel, City of Santa Paula (2022)
- Tony Trembley, City of Camarillo (2022-2025; Chair 2022)
- William Weirick, City of Ojai (2022)
- Jim White, Citizen Rep, County (2022-2025)

A representative of Caltrans District 7 also serves on the Commission as an ex-officio (non-voting) member.

The Commission utilizes a Finance/Administration committee, as well as other ad hoc committees as needed. Commissioners are also assigned to regional committees such as Los Angeles – San Diego – San Luis Obispo Rail Corridor (LOSSAN Corridor); Unmet Transit Needs; and Coastal Express Policy Advisory Committee (in partnership with Santa Barbara County Association of Governments).



### Goal setting and strategic planning

VCTC adopted a new Strategic Plan in 2023, which included a series of adopted goals and supporting strategies. Four new goals and more than 50 strategies were the product of intensive input from Commissioners, executive staff, and VCTC employees during FY 2022/23. Following the principle of, “VCTC can’t do everything, but we can do some things very well by setting priorities,” top priorities were established for the first two years of implementation (FY 2023/24 and FY 2024/25). Those priorities are as follows:

- **Goal A: Complete transportation-related plans and studied and allocate funding and resources aimed at improving mobility within Ventura County through various types of multimodal transportation programs and services.**
  - **Strategy A1:** Integrate the Comprehensive Transportation Plan (CTP) as VCTC’s primary guiding document.
  - **Strategy A6:** Initiate the process to become a leader in the development of Mobility as a Service (MaaS) strategy, including pursuit of a pilot mobility program, to assist the State in meeting its air quality goals, promoting public transit ridership recovery and increasing mobility choices.
- **Goal B: Provide for an accessible, reliable innovative, multimodal transportation system to meet the needs of Ventura County residents and visitors, which is compatible with regional plans based on industry best practices and standards.**
  - **Strategy B1:** Encourage city and county partners to plan and prioritize building new bike lanes and continue seeking funds for this purpose.
  - **Strategy B6:** Coordinate with Caltrans, Ventura County, and cities to prioritize the projects and submit grant application(s) for goods movement projects based on the recommendations of the Ventura County Freight Corridors Study.
  - **Strategy B23:** Evaluate and consider continuation of the free transit pass programs (college ride, youth pass) to maximize ridership and ensure efficient use of resources.
- **Goal C: Collaborate with agencies across the region to provide sustainable and improved transportation services within Ventura County.**
  - **Strategy C5:** Engage federal and state legislators to secure more transportation funding, protect existing revenues, and support legislation that may benefit VCTC and its operators (or oppose legislation that may adversely affect VCTC and its operations).

One of the primary planning documents for an RTPA is typically the Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). The RTP is a long-range (25-year) transportation plan providing a vision for regional transportation investments. The Sustainable Communities Strategy (SCS) element, required under SB 375, demonstrates the integration of land use, transportation strategies, and transportation investments that will help meet regional greenhouse gas reduction targets.

While VCTC is the Regional Transportation Planning Agency for Ventura County, it is not responsible for preparing the Regional Transportation Plan. As a member of the Southern California Association of Governments (SCAG), which serves as the Metropolitan Planning Organization for the region, Ventura County is included within SCAG’s Connect SoCal Plan, which serves as the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) for the six-county area. The current RTP/SCS was adopted on April 4, 2024, by SCAG’s Regional Council and spans the 25-year period between 2025 and



2050. Planning has already begun on the 2028 update. The Regional Council includes four representatives from Ventura County as well as a representative from VCTC.

The Connect SoCal plan primarily looks at the region as a whole, rather than planning for each county individually. While some key projects are identified by county, the majority of the plan takes a more holistic view. The RTP/SCS does set forth a series of goals and guiding principles that are applicable across the region.

Exhibit 3.2 Connect SoCal Goals

Category	Goals	Subgoals
Mobility	Build and maintain an integrated multimodal transportation network	Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions.
		Ensure that reliable, accessible, affordable and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities
		Support planning for people of all ages, abilities and backgrounds
Communities	Develop, connect and sustain livable and thriving communities	Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances
		Produce and preserve housing types in an effort to improve affordability, accessibility and opportunities for all households
Environment	Create a healthy region for people of today and tomorrow	Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change
		Integrate the region’s development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water
		Conserve the region’s resources
Economy	Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region	Improve access to jobs and educational resources
		Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities

To supplement the RTP/SCS and provide for more focused regional planning, VCTC prepares the Ventura County Comprehensive Transportation Plan (CTP). The first CTP was developed in 2013, which had a goal of ensuring mobility and enhancing the quality of life for all Ventura County residents. The most recent CTP was adopted by the Commission September 5, 2025. The draft CTP also served as Ventura County’s input into the Connect SoCal 2024 Plan. Given Ventura County does not have a current local transportation funding mechanism in place, the CTP also provides a prioritized slate of projects that can be implemented as funding becomes available.

The 2023 CTP included three future scenarios built on anticipated transportation needs and challenges across a more than 20-year horizon as well as community input. The three scenarios are:

- Scenario A: Baseline future conditions; no additional sources of funding.
- Scenario B: Requires funding beyond that which is expected from traditional sources.
- Scenario C: Unconstrained transportation network.



The CTP has its own set of goals and objectives, all of which are consistent with those presented in the RTP/SCS and other local, state, and regional plans. VCTC's CTP goals and objectives are:

1. Balance transportation and land use
  - Foster a diversity of land uses that improve ease of access to housing, employment, recreation, and other needs
  - Integrate transportation and land use planning to encourage walking, cycling and transit
  - Enhance transit services to encourage growth to locate within high-quality transit areas
  - Improve active transportation facilities and infrastructure between residential and commercial zones
2. Reduce emissions and improve sustainability
  - Ensure availability of electric vehicle supportive infrastructure
  - Reduce per capita VMT
  - Encourage travel using low or zero emissions modes for more trips
3. Foster economic prosperity
  - Provide residents with affordable access to opportunities for employment, education, and social services
  - Improve the efficiency of freight movements while mitigating potential adverse impacts on local communities
4. Improve multimodal mobility choices and access to destinations
  - Provide integrated and seamless travel connections between modes
  - Reduce transit travel times, making them more competitive with private auto travel
  - Supports a range of multimodal trip options to access key destinations
5. Enhance transportation safety to eliminate deaths and serious injuries
  - Reduce the number of serious injury collisions year on year
  - Improve design and operations to ensure people feel safe using the transportation system
  - Improve safety outcomes for vulnerable users of the transportation system

In addition, VCTC has established three guiding principles:

1. Transportation projects enhance the **quality of life** for Ventura County residents and visitors.
2. Transportation investments are **aligned with conservation priorities** to reduce impacts on the natural environment and **preserve agricultural and open space areas**.
3. Transportation investments are **equitably** planned and implemented to eliminate burdens of low-income communities, disadvantaged groups, and people of color.

Since the beginning of the audit period, VCTC has developed goals and objectives specific to different modes and projects through regional planning efforts. These have included:

- Coordinated Public Transit-Human Services Transportation Plan (2022)
- Transit Asset Management Group Plan (2022)
- Transit Integration and Efficiency Study (TIES) (2023)
- Ventura County Vehicle Miles Traveled Adaptive Mitigation Program (2023)
- County-wide Short Range Transit Plan (2026)
- Santa Paula Branch Line Trail Master Plan Update (ongoing; 2026)
- Ventura County Bus Stop Assessment (ongoing; 2026)



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## Chapter 4 | Program Compliance

This section examines the VCTC's compliance with the State of California's Transportation Development Act as well as relevant sections of California's Public Utilities Commission code. An annual certified fiscal audit confirms TDA funds were apportioned in conformance with applicable laws, rules, and regulations. Although compliance verification is not a Triennial Performance Audit function, several specific requirements concern issues relevant to the performance audit. The RTPA considers full use of funds under CCR Section 6754(a) to refer to operating funds but not capital funds. The Triennial Performance Audit findings and related comments are delineated in Exhibit 3.1.

Compliance was determined through discussions with VCTC staff as well as an inspection of relevant documents, including the fiscal audits for each year of the triennium. Also reviewed were planning documents, Board actions, and other related documentation.

No compliance issues have been identified for VCTC as the RTPA.

### Developments Occurring During the Audit Period

For many transit operators in California, recent years have reflected both the acute impacts of and recovery from the COVID-19 pandemic. By the end of FY 2024/25 – even earlier in some cases – most operators had exhausted federal relief funds, even though penalties for non-compliance with farebox recovery ratios continued to be waived. However, the receipt of federal relief funds complicated matters, as they impacted the amount of TDA funding operators were eligible to receive and, in some cases, resulted in over-payments that had to be resolved after the funds were spent. Many operators, even more than five years after the onset of the pandemic, still struggle with ridership that has yet to return to pre-pandemic levels.

California Assembly Bill 90, signed into law on June 29, 2020, provided temporary regulatory relief for transit operators required to conform with Transportation Development Act (TDA) farebox recovery ratio thresholds in FY 2019/20 and FY 2020/21. California Assembly Bill 149, signed into law on July 16, 2021, provided additional regulatory relief by extending the provisions of AB 90 through FY 2022/23 and adjusting definitions of eligible revenues and operating costs. Most recently, California Senate Bill 125, signed into law on July 10, 2023, extended protections provided via earlier legislation through FY 2025/26. While this means the audit period covered by this audit is fully exempt from penalties for non-compliance with the farebox recovery ratio, for example, it also means that transit operators may need to be in compliance by the second year of the next audit period.

While the ability to maintain state mandates and performance measures is important, these measures enabled transit operators to adjust to the impacts of the COVID-19 pandemic while continuing to receive their full allocations of funding under the TDA.

Together, these three pieces of legislation include the following additional provisions specific to transit operator TDA funding under Article 4:



- Prohibits the imposition of the TDA revenue penalty on an operator that did not maintain the required ratio of fare revenues to operating cost from FY 2019/20 through FY 2025/26.
- Expands the definition of “local funds” to enable the use of federal funding to supplement fare revenues and allows operators to calculate free and reduced fares at their actual value.
- Adjusts the definition of operating cost to exclude the cost of ADA paratransit services, demand-response and microtransit services designed to extend access to service, ticketing/payment systems, security, some pension costs, and some planning costs.
- Allows operators to use STA funds as needed to keep transit service levels from being reduced or eliminated through FY 2025/26.

SB 125 also called for the establishment of the Transit Transformation Task Force to develop policy recommendations aimed at increasing transit ridership and improving the customer experience statewide. In the more than 50 years since the adoption of the Transportation Development Act (TDA), California’s public transportation landscape has evolved significantly. Many transit operators have struggled to meet the farebox recovery ratio requirement, raising questions about whether it remains an appropriate or effective measure of TDA compliance.

In 2018, the chairs of California’s legislative transportation committees asked the California Transit Association to convene a policy task force to examine the TDA. That effort produced a draft framework for reform in early 2020, just prior to the COVID-19 pandemic. The Transit Transformation Task Force released its report in December 2025. While the report includes several recommendations to modernize the TDA - including identifying the farebox recovery ratio and operating cost per hour requirements as outdated and recommending that farebox recovery and cost-inflation penalties be replaced - these proposals represent an initial step rather than immediate policy changes. Achieving the necessary funding and statutory reforms will require sustained advocacy over the coming years.



Exhibit 4.1 Transit Development Act Compliance Requirements

Compliance Element	Reference	Compliance	Comments
All transportation operators and city or county governments which have responsibility for serving a given area, in total, claim no more than those Local Transportation Fund monies apportioned to that area.	PUC 99231	In compliance	
The RTPA has adopted rules and regulations delineating procedures for the submission of claims for facilities provided for the exclusive use of pedestrians and bicycles (Article 3).	PUC 99233, 99234	In compliance	
The RTPA has established a social services transportation advisory council. The RTPA must ensure that there is a citizen participation process that includes at least an annual public hearing.	PUC 99238, 99238.5	In compliance	The CTAC/SSTAC meets on the 2 <sup>nd</sup> Tuesday of the month in January, April, June, and September. A public hearing to review unmet transit needs occurs annually.  Public Unmet Transit Needs hearings held on: February 4, 2022 (Camarillo City Hall) February 3, 2023 (Camarillo City Hall) February 2, 2024 (Camarillo Public Library) February 7, 2025 (Camarillo Public Library)
The RTPA has annually identified, analyzed, and recommended potential productivity improvements which could lower operating cost of those operators, which operate at least 50 percent of their vehicle service miles within the RTPA’s jurisdiction. Recommendations include, but are not being limited to, those made in the performance audit. <ul style="list-style-type: none"> <li>• A committee for the purpose of providing advice on productivity improvements may be formed.</li> <li>• The operator has made a reasonable effort to implement improvements recommended by the RTPA as determined by the RTPA, or else the operator has not received an allocation that exceeds its prior year allocation.</li> </ul>	PUC 99244	In compliance	VCTC’s Transcom Committee (made up of all Ventura County transit operators) meets monthly. While it is not a productivity committee, it does provide operators with opportunities to discuss productivity, performance, and improvements.
The RTPA has ensured that all claimants to whom it allocated TDA funds submit to it and to the state controller an annual certified fiscal and compliance audit within 180 days after the end of the fiscal year.	PUC 99245	In compliance	See Exhibit 4.2.
The RTPA has submitted to the state controller an annual certified fiscal audit within 12 months of the end of the fiscal year.	CCR 6662	In compliance	FY 2022/23: November 14, 2023 FY 2023/24: November 12, 2024 FY 2024/25: December 19, 2025



Compliance Element	Reference	Compliance	Comments
The RTPA has submitted within 90 days after the end of the fiscal year an annual financial transactions report to the state controller.**	CCR 6660	In compliance	FY 2022/23: December 20, 2023 FY 2023/24: December 23, 2024 FY 2024/25: January 29, 2026
The RTPA has designated an independent entity to conduct a performance audit of operators and itself (for the current and previous triennia). For operators, the audit was made and calculated the required performance indicators, and the audit report was transmitted to the entity that allocates the operator’s TDA money, and to the RTPA within 12 months after the end of the triennium. If an operator’s audit was not transmitted by the start of the second fiscal year following the last fiscal year of the triennium, TDA funds were not allocated to that operator for that or subsequent fiscal years until the audit was transmitted.	PUC 99246, 99248	In compliance	Moore & Associates conducted the prior audit and was selected to prepare the current audit. The prior audit was completed in April 2023. Therefore, no operator allocations were affected by a failure to complete the audit.  The current Triennial Performance Audits are scheduled to be completed prior to June 30, 2026.
The RTPA has submitted a copy of its performance audit to the Director of the California Department of Transportation. In addition, the RTPA has certified in writing to the Director that the performance audits of operators located in the area under its jurisdiction have been completed.	PUC 99246(c)	In compliance	While the RTPA could not provide proof of the certification, Caltrans did confirm receipt of the RTPA’s prior Triennial Performance Audit
For Article 8(c) claimants, the RTPA may adopt performance criteria, local match requirements, or fare recovery ratios. In such cases, the rules and regulations of the RTPA will apply.	PUC 99405	Not applicable	VCTC has not adopted alternative compliance requirements for any of its TDA 8(c) recipients.
The performance audit of the operator providing public transportation services shall include a verification of the operator’s cost per passenger, operating cost per vehicle service hour, passenger per vehicle service mile, and vehicle service hours per employee, as defined in Section 99247. The performance audit shall include consideration of the needs and types of passengers being served and the employment of part-time drivers and the contracting with common carriers of persons operating under a franchise or license to provide services during peak hours, as defined in subdivision (a) of section 99260.2.	PUC 99246(d)	In compliance	
The RTPA has established rules and regulations regarding revenue ratios for transportation operators providing services in urbanized and newly urbanized areas.	PUC 99270.1, 99270.2	Not applicable	
The RTPA has adopted criteria, rules, and regulations for the evaluation of claims filed under Article 4.5 of the TDA and the determination of the cost effectiveness of the proposed community transit services.	PUC 99275.5	Not applicable	VCTC has no eligible Article 4.5 claimants other than itself.



Compliance Element	Reference	Compliance	Comments
State transit assistance funds received by the RTPA are allocated only for transportation planning and mass transportation purposes.	PUC 99310.5, 99313.3, Proposition 116	In compliance	
Transit operators must meet one of two efficiency standards in order to use their full allocation of state transit assistance funds for operating purposes. If an operator does not meet either efficiency standard, the portion of the allocation that the operator may use for operations shall be the total allocation to the operator reduced by the lowest percentage by which the operator's total operating cost per revenue vehicle hour exceeded the target amount necessary to meet the applicable efficiency standard. The remaining portion of the operator's allocation shall be used only for capital purposes.	PUC 99314.6	In compliance	This requirement was waived during the audit period under AB 149 and SB 125.
The amount received pursuant to the Public Utilities Code, Section 99314.3, by each RTPA for state transit assistance is allocated to the operators in the area of its jurisdiction as allocated by the State Controller's Office.	PUC 99314.3	In compliance	
<p>If TDA funds are allocated to purposes not directly related to public or specialized transportation services, or facilities for exclusive use of pedestrians and bicycles, the transit planning agency has annually:</p> <ul style="list-style-type: none"> <li>• Consulted with the Social Services Transportation Advisory Council (SSTAC) established pursuant to PUC Section 99238;</li> <li>• Identified transit needs, including: <ul style="list-style-type: none"> <li>▪ Groups that are transit-dependent or transit-disadvantaged;</li> <li>▪ Adequacy of existing transit services to meet the needs of groups identified; and</li> <li>▪ Analysis of potential alternatives to provide transportation alternatives;</li> </ul> </li> <li>• Adopted or reaffirmed definitions of "unmet transit needs" and "reasonable to meet";</li> <li>• Identified the unmet transit needs and those needs that are reasonable to meet; and</li> <li>• Adopted a finding that there are no unmet transit needs, that there are no unmet transit needs that are reasonable to meet, or that there are unmet transit needs including needs that are reasonable to meet.</li> </ul> <p>If a finding is adopted that there are unmet transit needs, these needs must have been funded before an allocation was made for streets and roads.</p>	PUC 99401.5	In compliance	<p>The annual Unmet Transit Needs process undertaken by VCTC includes the following elements:</p> <ul style="list-style-type: none"> <li>• Review of population densities and transit operators</li> <li>• Public comment period</li> <li>• Unmet Transit Needs survey</li> <li>• Meetings held throughout the county</li> <li>• Public hearing</li> <li>• Adoption/reaffirmation of definitions of "unmet transit need" and "reasonable to meet"</li> <li>• Identification of any unmet transit needs that are reasonable to meet</li> <li>• Consultation with the Social Services Transportation Advisory Council (SSTAC)</li> </ul>



Exhibit 4.2 Transit Operator Fiscal Audit Completion Dates

Name of Operator	FY 2022/23	FY 2023/24	FY 2024/25
City of Camarillo	December 27, 2023	November 26, 2024	November 17, 2025
City of Moorpark	December 11, 2023	December 20, 2024	December 9, 2025
City of Ojai	March 21, 2024	February 5, 2025	March 31, 2026
City of Simi Valley	March 14, 2024	February 18, 2025	February 3, 2026
City of Thousand Oaks	December 18, 2023	December 5, 2024	December 1, 2025
County of Ventura	December 31, 2023	February 13, 2025	March 30, 2026
ECTA	December 12, 2023	December 3, 2024	November 17, 2025
Gold Coast Transit District	December 31, 2023	December 18, 2024	December 17, 2025
Valley Express	November 27, 2023	November 25, 2024	December 19, 2025
VCTC Intercity	December 14, 2023	December 10, 2024	December 17, 2025



## Chapter 5 | Prior Recommendations

This section reviews and evaluates the implementation of prior Triennial Performance Audit recommendations. This objective assessment provides assurance the VCTC has made quantifiable progress toward improving both the efficiency and effectiveness of its programs.

The prior audit – completed in April 2023 by Moore & Associates, Inc. for the three fiscal years ending June 30, 2022 – included one recommendation:

1. [Implement a process for operators to submit the implementation status of performance audit recommendations to VCTC’s Transit Operations and Planning department on an annual basis.](#)

**Discussion:** This recommendation was carried forward from the previous audit. At that time, Finance staff expressed a desire to keep this process separate from the TDA claims process. However, in discussions during the prior audit period, staff indicated keeping the productivity reporting process concurrent with the TDA claims process might be preferred. The prior auditor recommend VCTC determine a timeline for productivity reporting, either as an accompaniment to the TDA claim (though not part of the claim forms) or following the end of each fiscal year.

The prior auditor noted that in many cases the responses would be anecdotal. In others, there would be no progress to report, or there might be an explanation of why the recommendation was no longer relevant. Given recommendations may require planning/budgeting or be contingent on other actions/conditions, not every recommendation can be implemented right away. The purpose of the process would be to ensure there is progress toward the implementation of recommendations, not necessarily to force the implementation of recommendations. It would ensure productivity is monitored without affecting the TDA claims process.

**Progress:** Since prior last audit, VCTC completed its Short Range Transit Plan (SRTP), which was a major effort focused on evaluating service productivity, identifying systemwide performance issues, and developing data-driven recommendations to improve efficiency and effectiveness across the county. The SRTP included a comprehensive review of ridership trends, cost and farebox recovery data, service performance metrics, and other productivity measures across operators. The SRTP was intentionally allowed to conclude prior to implementing more formal changes to existing coordination processes so that recommendations would be grounded in a comprehensive, countywide analysis rather than incremental adjustments.

Building on the SRTP, VCTC has taken the item to TRANSCOM to formalize a more structured approach to tracking service changes and productivity-related actions across operators. As part of this effort, VCTC is developing and distributing a transit matrix to consistently document service changes, productivity considerations, and follow-up actions, with the goal of improving transparency, coordination, and accountability moving forward.



In addition, VCTC continues to support productivity improvements through operational initiatives such as the implementation of RideCo technology for ADA paratransit services. RideCo is intended to improve scheduling efficiency, trip productivity, and data availability, strengthening VCTC's ability to monitor performance metrics.

Finally, VCTC's new Finance Director is open to potentially including this process as part of the annual TDA claims process.

**Status:** Implemented.



## Chapter 6 | Functional Review

A functional review of the VCTC determines the extent and efficiency of the following functional activities:

- Administration and Management;
- Transportation Planning and Regional Coordination;
- Claimant Relationships and Oversight;
- Marketing and Transportation Alternatives; and
- Grant Applications and Management; and

### Administration and Management

VCTC sets transportation priorities, selects projects, and distributes state and federal monies to its members to maintain, repair and support operations of local roadways, public transportation and other transportation systems. The agency works with Caltrans to plan, select and construct major highway projects. VCTC is also responsible for administering Transportation Development Act (TDA) funds, including both State Transit Assistance (STA) funds and Local Transportation Funds (LTF). VCTC allocates transit funding to the City of Camarillo, City of Fillmore, City of Moorpark, City of Ojai, City of Santa Paula, City of Simi Valley, City of Thousand Oaks, County of Ventura, Gold Coast Transit District, and Metrolink. VCTC also operates VCTC Intercity Bus and serves as the administrator for Valley Express. All major policy efforts go through a committee process to ensure collaboration.

RTPA management provides effective oversight of both ongoing programs and special projects. The Programming department monitors the progress of all programs, while Finance provides monthly reports comparing budget-to-actual. Weekly director-level meetings and monthly staff meetings also provide an opportunity to inform management regarding the progress and financial status of VCTC programs.

VCTC's Finance Director efficiently leads the processing of TDA claims for the RTPA. Local operators appear to be satisfied with VCTC's effectiveness. In recent years VCTC has led some procurements and initiatives on a county-wide level that might not be achievable by individual operators. This has included technology projects, the implementation of the VCbuspass program, College and Youth Ride Free programs, and the upcoming introduction of open-loop payment systems.

Goal-setting for VCTC's internal functions is accomplished through the development of budget documents and internal checklists and processes that are updated annually. Goals for applying for and securing grants are included within the VCTC Strategic Plan, which is updated every five years. Progress is reported to the Commission during monthly meetings.

Regional goal-setting is discussed in greater detail in Chapter 3. Goals for transit operator performance are set forth in the Comprehensive Transportation Plan (CTP), which provides goals and solutions to improve the transit network in Ventura County. Progress is tracked through Transcom and the Transportation Technical Advisory Committee (TTAC). Transit operators that receive federal funds also provide quarterly reports in compliance with federal program requirements.



Goals for transportation alternatives are included in planning documents such as the Short Range Transit Plan (SRTP), Transit Integration and Efficiency Study (TIES), CTP, and VCTC Strategic Plan. Travel training and mobility education is also monitored.

The Ventura County Transportation Commission is the governing body for the RTPA. Its composition and function is discussed in greater detail in Chapter 3. Meetings are held in person and there has not been any issue with achieving a quorum. Particular interests of members of the Commission are folded into the Strategic Plan, including Mobility as a Service (MaaS), bus stop infrastructure, desire for rail quiet zones, and the Santa Paula Branch Line.

Within its annual budget, VCTC identifies objectives for each of its programs, as well as recent accomplishments, key performance metrics (where appropriate), major work elements, work product, funding sources, and projected expenses. The annual budget includes all programs and funds for VCTC as the RTPA as well as for the transit programs it operates and administers. The budget is sufficient and appropriate to accomplish established goals and objectives.

VCTC is fully staffed with 22 employees. During the audit period, VCTC saw three retirements – two Director-level positions and one administrative assistant. Both Director-level transitions were very smooth. There was only a short gap between the former Finance Director’s retirement and the hiring of the new Finance Director, and staff were able to keep things moving during that time without any real issues. The retiring Programming Director trained his staff well, so there were minimal interruptions to workflow before the new Programming Director came on board. Both of the new Directors have enhanced the collaborative nature of the work as well as praised the knowledge and skill level of staff. A greater level of information-sharing and fewer silos have benefitted the entire organization. VCTC is also looking to migrate to a cloud-based Enterprise Resource Planning (ERP) platform to replace its 30-year-old legacy system, which would also enhance efficiency.

Staff receive annual performance evaluations and participate in goal-setting. New hires receive a six-month review and an annual review thereafter. Pay increases are generally provided via merit raises accompanying annual performance evaluations for employees who are not at the top of their range. VCTC staff are eligible for health insurance (including dental and vision), CalPERS retirement benefits, paid vacation and sick time, educational reimbursement program, Employee Assistance Program, life insurance, accidental death and dismemberment insurance, long term disability insurance, and state disability insurance.

VCTC staff are encouraged to participate in training. Eight hours per month is a general guideline, and attendance at one conference per year is encouraged. VCTC budgets for training, and all staff have training opportunities. There are ample virtual/remote training opportunities in many areas of interest to VCTC staff. All department directors actively share information from trainings they attend.

#### Transportation Planning and Regional Coordination

VCTC completed an update of its Comprehensive Transportation Plan, which was adopted in late 2025 (detailed further in Chapter 3). Staff believe it does a good job of encompassing transportation projects region-wide.



A County-wide Short Range Transit Plan (SRTP) was completed in late 2025 and was in the process of being adopted at the time of this report. The SRTP focuses on localized improvements to individual transit operators that enhance the regional transit network. Route- and system-level recommendations were included for nearly all operators. (The chief exception was Gold Coast Transit District, which recently completed its own Short Range Transit Plan. The recommendations from that plan were carried forward and referenced in the Countywide SRTP.) Reception from the operators was largely positive, though there was concern expressed about some of the recommendations. VCTC staff acknowledged that some of the recommendations would need to rely on greater trust between the operators and could take some time to implement.

### Claimant Relationships and Oversight

Over the past three years, VCTC has undertaken several regional technology projects. By doing a joint procurement, some of the operators are able to implement payment and performance monitoring platforms they would be unable to do individually. This includes implementation of automatic vehicle locators (AVL), Umo readers (VCbuspass program), and the new open-loop payment system. VCTC has also led some joint grant applications and provided letters of support for operator grants.

VCTC also conducts regional marketing activities that amplify what the operators are doing and provides all marketing for regional projects (such as VCbuspass and the College and Youth Ride Free programs). VCTC assists operators by preparing a group Transit Asset Management Plan and marketing local transit services as part of its countywide outreach. Operators are aware of the assistance available through VCTC and make use of it as needed. VCTC is seen as a particularly valuable resource by operator staff new to their positions.

Transcom has served as a de facto productivity committee for the transit operators, reviewing performance audit recommendations and other study findings. Operators were also evaluated through the preparation of the SRTP. VCTC intends to continue to gather performance information from the operators using a comprehensive matrix that will reflect service changes and help facilitate better coordination.

As the designated RTPA and a trusted source of transportation-related knowledge (as well as the conduit through which funding passes), VCTC staff interact frequently with its claimants. Staff provide guidance on forms, claims, questions, and financial issues as needed. Communication regarding the TDA is primarily handled by the Finance Director, who monitors operator compliance with reporting requirements. TDA-related information is also communicated through the monthly Transcom meetings.

### Marketing and Transportation Alternatives

VCTC conducts a regional marketing program for public transportation. While individual operators typically handle their own marketing and outreach, VCTC includes operator materials as part of outreach activities it conducts throughout the county.

VCTC's Rideshare Program offers commuter services through the Southern California RideMatch regional rideshare database. The RideMatch program offers trip planning, carpool and vanpool ridematching, bike commute matching, green commute logging, commute challenges, ridesharing incentives, and a commute cost calendar. It also includes a map of alternate fuel vehicle charging stations. RideMatch also offers a



Guaranteed Ride Home program that provides a free taxi ride or one-day car rental on a day an alternative commute mode is used up to six times a year for qualifying conditions.

VCTC also offers online and printed bike maps for those who ride, whether for commuting purposes or recreation. The VCTC Strategic Plan includes goals and strategies specific to active transportation, including encouraging city and county partners to expand bike lanes, encouraging the integration of e-bikes, and enhance access to bikes for youth and low-income residents in Ventura County.

#### Grant Applications and Management

One of the most significant grants awarded during the audit period was the Regional Early Action Planning (REAP) 2.0 grant through the Southern California Association of Governments (SCAG), which is funding an assessment of bus stops throughout Ventura County as well as the implementation of improvements identified through the assessment and by individual operators. The grant is also funding the implementation of the open-loop payment system throughout the county. The open-loop system has already been deployed by VCTC Intercity Bus, Valley Express, and the City of Camarillo, and it is expected to be operational on the remaining operators by the end of the fiscal year. VCTC has also spearheaded a number of regional projects using SB 125 funds, including farebox replacement, youth and college ride free programs, free fare days, and to provide better support for regional paratransit service.

FTA and CMAQ applications are submitted through VCTC for itself and its subrecipients. The Gold Coast Transit District and the City of Simi Valley apply for funding directly. VCTC is the designated recipient for Section 5310 funding. If operators apply for grants on their own, VCTC may provide letters of recommendation, yet typically does not provide technical assistance or review/coordinate grant applications. For regional programs or projects, VCTC typically takes the lead, with operators as subrecipients. In these cases VCTC takes on responsibility for the grant reporting, and often provides opportunities to the smaller operators that they may not qualify for on their own. VCTC monitors grants for itself and its sub-recipients.

VCTC is proud of the regional projects it has been able to implement during the audit period. The technology projects have been very successful, and the smaller agencies are much more willing to do the implementation if VCTC takes the lead. Continuing the free fare programs has been especially critical in improving ridership since the COVID-19 pandemic, and has really contributed to ridership recovery. Continuing the programs is challenging without dedicated funding, but the programs have been too popular to cancel.



## Chapter 7 | Findings and Recommendations

### Conclusions

The Ventura County Transportation Commission (as the RTPA) is found to be in compliance with the Transportation Development Act (TDA). One recommendation intended to improve the effectiveness and efficiency of the RTPA is detailed below.

### Findings

Based on discussions with VCTC staff, analysis of program performance, and an audit of program compliance and function, the audit team presents no findings related to compliance with the TDA.

### Program Recommendations

Recommendations are intended to assist in bringing the operator into compliance with the requirements and standards of the TDA as well as address non-compliance-related issues, challenges, or opportunities observed during the site visit and functional review. The following recommendation is presented for the Ventura County Transportation Commission as the RTPA.

**Recommendation 1: Submit a formal letter to Caltrans accompanying the RTPA audit and certifying completion of the operator audits, and ensure that letter is maintained for the next Triennial Performance Audit.**

**Discussion:** PUC 99246(c) directs the RTPA to submit its Triennial Performance Audit to Caltrans, as well as certify in writing that the performance audits of the transit operators have been completed. This is frequently done more informally via email, though it may include a formal letter transmitted by email. VCTC was unable to provide this communication following the prior Triennial Performance Audit, but did provide confirmation from Caltrans that the RTPA audit had been received. As such, this was not considered a compliance finding, but does warrant action to ensure compliance moving forward.

**Contributing Factor(s):** When the certification of the operator audits is submitted solely via email, it is not always saved in a manner that can be retrieved by someone other than the sender. This can make it difficult to demonstrate that the communication was indeed submitted.

**Recommended Action:** VCTC should prepare a letter addressed to Caltrans that references the completed RTPA audit and certifies the completion of the operator audits. That letter should be sent as an attachment to Caltrans via email, with the RTPA audit as a second attachment. The letter should be dated the day it is emailed and the letter stored electronically in a location where it can be retrieved at the time of the next Triennial Performance Audit.

**Timeline:** FY 2025/26.

**Anticipated Cost:** None.



Exhibit 7.1 Audit Recommendations

	Recommendations	Importance	Timeline
1	Submit a formal letter to Caltrans accompanying the RTPA audit and certifying completion of the operator audits, and ensure that letter is maintained for the next Triennial Performance Audit.	High	FY 2025/26