



OHIO AUDITOR OF STATE  
**KEITH FABER**







65 East State Street  
Columbus, Ohio 43215  
[ContactUs@ohioauditor.gov](mailto:ContactUs@ohioauditor.gov)  
800-282-0370

## INDEPENDENT ACCOUNTANT'S REPORT ON APPLYING AGREED-UPON PROCEDURES

Greater Cleveland Regional Transit Authority  
Cuyahoga County  
1240 West 6<sup>th</sup> Street  
Cleveland, Ohio 44113

To the Board of Trustees:

We have performed the procedures enumerated below, solely to assist the Authority in complying with the reporting requirements of the National Transit Database (NTD), 49 CFR Part 630, and as presented in the *2024 NTD Policy Manual*, for the year ended December 31, 2024. Management of the Authority is responsible for compliance with these requirements.

The Board of Trustees and the management of the Greater Cleveland Regional Transit Authority (the Authority) and the Federal Transit Administration (FTA) have agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of providing assistance in complying with the reporting requirements of the National Transit Database (NTD), 49 CFR Part 630, and as presented in the *2024 NTD Policy Manual*, for the year ended December 31, 2024. No other party acknowledged the appropriateness of the procedures. 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 the report and may not meet the needs of all users of the report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes. The sufficiency of the procedures is solely the responsibility of the parties specified in the report. Consequently, we make no representation regarding the sufficiency of the procedures described below and in the attached appendix, either for the purpose for which this report has been requested or for any other purpose.

FTA has established the following standards with regard to the data reported to it in the Federal Funding Allocation Statistics Form (FFA-10) of the Authority's annual National Transit Database (NTD) report:

- A system is in place and maintained for recording data in accordance with NTD definitions. The correct data are being measured and no systematic errors exist.
- A system is in place to record data on a continuing basis, and the data gathering is an ongoing effort.
- Source documents are available to support the reported data and are maintained for FTA review and audit for a minimum of three years following FTA's receipt of the NTD report. The data are fully documented and securely stored.
- A system of internal controls is in place to ensure the data collection process is accurate and that the recording system and reported comments are not altered. Documents are reviewed and signed by a supervisor, as required.
- The data collection methods are those suggested by FTA or otherwise meet FTA requirements.
- The deadhead miles, computed as the difference between the reported total actual vehicle miles data and the reported total actual Vehicle Revenue Miles (VRM) data, appear to be accurate.
- Data are consistent with prior reporting periods and other facts known about Authority operations.

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We have applied the procedures to the data contained in the accompanying FFA-10 form for the fiscal year ended December 31, 2024. Such procedures, which were agreed to and specified by FTA in the Declarations section of the 2024 NTD Policy Manual and were agreed to by the Authority, were applied to assist you in evaluating whether the Authority complied with the standards described in the first paragraph of this part and that the information included in the NTD report Federal Funding Allocation Statistics form for the year ended December 31, 2024 is presented in conformity with the requirements of 49 CFR Part 630 and as presented in the 2024 NTD Policy Manual.

The procedures were applied separately to each of the information systems used to develop the reported actual VRM, Fixed Guideway, Directional Route Miles, Passenger Miles Traveled, and Operating Expenses of the Greater Cleveland Regional Transit Authority for the year ended December 31, 2024 for each of the following modes:

- Motor Bus- Directly Operated (MD-DO);
- Rail Bus- Directly Operated (RB-DO);
- Heavy Rail- Directly Operated (HR-DO);
- Light Rail- Directly Operated (LR-DO);
- Demand Response- Directly Operated (DR-DO); and,
- Demand Response- Purchased Transportation.

We were engaged by the Authority to perform this agreed-upon procedures engagement and conducted our engagement in accordance with the standards established by the AICPA and the *Comptroller General of the United States' Government Auditing Standards*. 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, the Authority's conformance with the requirements described above, for the year ended December 31, 2024. 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 Authority and to meet our ethical responsibilities, in accordance with the ethical requirements established by the Comptroller General of the United States' Government Auditing Standards related to our agreed upon procedures engagement.



Keith Faber  
Auditor of State  
Columbus, Ohio  
June 20, 2025

## APPENDIX

The procedures below were applied to each applicable mode and type of service (TOS) (Directly Operated (DO) and Purchased Transportation (PT) as listed below. The procedures and the associated findings are as follows:

1. We obtained and read a copy of written system procedures for reporting and maintaining data in accordance with NTD requirements and definitions set forth in 49 CFR Part 630 and as presented in the 2024 NTD Policy Manual. Written procedures are available for reporting and maintaining required data. We found no exceptions.
2. We inquired with the personnel assigned responsibility for supervising the preparation and maintenance of NTD data to determine the following:
  - The extent to which the Authority followed the procedures on a continuous basis. The Budget Analyst responded that the procedures were followed on the continuous basis. We found no exceptions.
  - That procedures identified above resulted in the accumulation and reporting of data consistent with NTD definitions and requirements set forth in 49 CFR Part 630 and as presented in the 2024 NTD Policy Manual. We observed the required reporting data was accumulated and available. We found no exceptions.
3. We obtained the retention policy that the Authority follows and agreed that source documents supporting NTD data reported on the Federal Funding Allocation Statistics form were included. NTD data is included in the Authority's retention policy. We found no exceptions.
4. Based on a description of the Authority's procedures from items (1) and (2) above, we identified all the source documents that the Authority must retain for a minimum of three years. For each type of source document, we selected three months (March, April, and June 2024) out of the year and inspected whether the document exists for each of these periods. We found no exceptions.
5. We inquired whether separate individuals (independent of the individuals preparing source documents and posting data summaries) inspected the source documents and data summaries for completeness, accuracy, and reasonableness and how often the individuals perform such reviews. Individuals independent of the preparing and posting data summaries compared the source documents to the data summaries on a monthly basis. We found no exceptions.
6. We selected one source document and inspected whether supervisors' signatures are present as required by the system of internal controls. Supervisors' signatures are not required; however, approval of source documentation is obtained through the NTD CEO's Certification Report (D-10).
7. We obtained the worksheets used to prepare the final data that the Authority transcribes onto the Federal Funding Allocation Statistics form. We agreed the periodic data included on the worksheets to the periodic summaries prepared by the Authority. We recalculated the arithmetical accuracy of the summaries. We found no exceptions.
8. We inquired of the procedure for accumulating and recording passenger miles traveled (PMT) data in accordance with NTD requirements with Authority staff. We inspected the procedure and agreed it is one of the methods specifically approved in the 2024 NTD Policy Manual. We found no exceptions.

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9. We inquired of the Authority staff regarding the Authority's eligibility to conduct statistical sampling for PMT data every third year. We determined whether the Agency meets the NTD criteria that allow transit agencies to conduct statistical samples for accumulating PMT data every third year rather than annually. We determined the Authority did not meet the NTD criteria that allows transit agencies to conduct statistical samples every third year.
10. We obtained a description of the sampling procedure for estimation of PMT data used by the Authority. We obtained a copy of the Authority's working papers or methodology used to select the actual sample of runs for recording PMT data. These documents were used to determine the following:
  - a. If the Authority used average trip length, we determined that the universe of runs was the sampling frame and determined that the methodology used to select specific runs from the universe resulted in a random selection of runs. The Authority used average trip length. We found no exceptions.
  - b. The Authority followed the stated sampling procedure. We found no exceptions.
11. We selected ten source documents for accumulating PMT data and inspected the data for completeness (all required data was recorded) and recalculated the computations. We found no exceptions. We selected ten accumulation periods and recalculated the accumulations for each of the selected periods. We selected the accumulation periods listed below and recalculated the arithmetical accuracy of the summary. The following accumulation periods were selected:
  - a. January 7, 2024
  - b. March 13, 2024
  - c. April 12, 2024
  - d. May 8, 2024
  - e. June 30, 2024
  - f. July 30, 2024
  - g. August 28, 2024
  - h. October 19, 2024
  - i. December 9, 2024
  - j. December 26, 2024
12. For actual VRM data, we inquired and documented of the collection and recording methodology and determined that deadhead miles are systematically excluded from the computation. This is accomplished as follows:
  - We documented the procedures used to subtract missed trips from schedules. We selected ten days that service was operated and recalculated the daily total of missed trips and missed VRMs. We also recalculated the arithmetical accuracy of the summary. We found no exceptions.
  - We documented the procedures used to calculate and subtract deadhead mileage. Actual VRMs are not calculated from hubodometers.
  - Actual VRMs are not calculated from vehicle logs.
13. We inspected the recording and accumulation sheets for ten actual VRMs and agreed that locomotive miles are not included in the computation. We found no exceptions.

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14. For Fixed Guideway (FG) Directional Route Miles (DRM) reported, we inquired of the person responsible for maintaining and reporting NTD data and agreed that the operations met the FTA definition of FG in that the service is:

- Rail or Trolleybus (TB), or
- Bus (Motorbus (MB), Commuter Bus (CB), or Bus Rapid Transit (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 (LOS) D or worse on a parallel adjacent highway;
  - Restricted access is enforced for freeways; priority lanes used by other high occupancy vehicles (HOV) (i.e., Vanpools, carpools) must demonstrate safe operation; and

We found no exceptions.

15. We inquired of the person reporting NTD data as to the measurement of FG DRM and inspected that he or she computed mileage in accordance with FTA definitions of FG and DRM. We inquired of any service changes during the year that resulted in an increase or decrease in DRMs. There were no service changes during the year that resulted in an increase or decrease in DRMs. We found no exceptions.

16. We inquired of the Director of Service Management if any temporary interruptions in transit service occurred during the report year. No service interruptions in transit service occurred during 2024.

17. We recalculated measurements FG by retracing route. We found no exceptions.

18. We inquired of the Director of Service Management whether other public transit agencies operate service over the same FG as the Authority. We determined through inquiry of the Director of Service Management the Authority coordinated with the other agencies such that the DRMs for the segment of FG are reported only once to the NTD on the Federal Funding Allocation form. We found no exceptions.

19. We inspected the FG segments form and there were no segments added in 2024.

20. We compared operating expenses with audited financial data after reconciling items are removed. We found no exceptions.

21. For purchased transportation services, we compared the PT fare revenues to the amount reported on the Contractual Relationship form. We found no exceptions.

22. We obtained a copy of the PT contracts and inspected for the following:

- The contracts specify:
  - the public transportation services to be provided;
  - the monetary consideration obligated by the Authority or governmental unit contracting for the service; and
  - the period covered by the contract (and that this period overlaps the entire, or a portion of, the period covered by the Authority's NTD report).
- The contract is signed by representatives of both parties to the contract.

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We inquired of Manager of Operations and observed that copies of the contracts are retained for three years. We found no exceptions

23. We inquired of the Manager of Operations if the Authority service to more than one UZA or between an UZA and a non-UZA. The Authority did not provide these services during 2024.
24. We compared the data reported on the Federal Funding Allocation Statistics Form to data from 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 percent, or FG DRM data that have increased or decreased, we inquired of Authority management regarding the specifics of operations that led to the increases or decreases in the data relative to the prior reporting period. We found no exceptions.

# OHIO AUDITOR OF STATE KEITH FABER



## GREATER CLEVELAND REGIONAL TRANSIT AUTHORITY NATIONAL TRANSPORTATION DATABASE (NTD) FINANCIAL DATA AGREED-UPON PROCEDURES CUYAHOGA COUNTY

### AUDITOR OF STATE OF OHIO CERTIFICATION

This is a true and correct copy of the report, which is required to be filed pursuant to Section 117.26, Revised Code, and which is filed in the Office of the Ohio Auditor of State in Columbus, Ohio.



Certified for Release 7/1/2025

65 East State Street, Columbus, Ohio 43215  
Phone: 614-466-4514 or 800-282-0370

This report is a matter of public record and is available online at  
[www.ohioauditor.gov](http://www.ohioauditor.gov)