

**Blocks 1 thru 9 to be completed by Auditors**

1. Audit Title: Finding 1: Identity and Access Controls for NRV Drivers Are Inadequate	2. Audit Title/Project Code: 2025-02	3. Issue Code: F-NRV-25-01
4. Auditor Name: Heather Wright, Audit Deputy Director		5. Issued Date: October 16, 2025
6. Finding Description: Agency Policy 607 and the NRV Fleet Plan expect that only authorized employees operate non-revenue vehicles. However, the current process for issuing Driver ID Tags doesn't verify identity—meaning anyone can pick up a tag without showing a badge or photo ID. While the fleet plan mentions that Geotab tracks usage and safety metrics, it doesn't address preventing tag sharing or managing tags through their lifecycle. In practice, tags and keys can be stored together, especially for vehicles assigned to departments, making it easy for someone else to grab them. This gap exists because there are no clear procedures or system controls for identity validation or tag management. This means the agency could lose accountability of who is driving the vehicles, and there's a real possibility that unauthorized or unsafe drivers could operate an NRV. 6a. Recommendation: To address this, the agency should require ID verification when issuing Driver ID tags, link each tag to an employee record, and enforce non-transferability. The new fleet management system/software should also be able to activate and deactivate tags so they can't be shared or remain active after an employee leaves or loses eligibility. In addition, current related process documentation should be updated to reflect ID requirements.		
7. Assigned Responsible Dept/Division: Service Delivery		8. Response Due Date: November 7, 2025

Management Response

9. Does management agree with the finding? Yes: ☒ (comments are optional) No: ☐ If "No", provide comments below: Comments: Comments: The GSC does enforce showing badges before handing out new driver ID tag. We are also unable to deactivate old tag numbers. Being that the tag itself doesn't store trip or driver data; it just tells the system "this driver is operating this vehicle." Once a tag is no longer used, it doesn't affect data or reports — it just becomes inactive by default because no one's scanning it. Even if you were to "deactivate" a tag, Geotab would still retain historical data showing that tag's trips or events. Deactivation doesn't change that — so Geotab focuses more on accurate driver-to-tag assignment rather than managing old tags.	
10. Does management agree to implement the recommendation? Yes: ☒ No: ☐ Action Plan, if different from recommendation: Estimated Date of Completion: June 30, 2026	
11. Manager Response Form Completed By: (Name, Title, Department) Rasheem Alston Supervisor NRV Fleet Operations Asset Management- Rolling Stock	12. Today's Date: October 17, 2025



13. Responsible Executive: (Name, Title, Department) George McGinn Executive Operations Director-Light Rail SDD-Rolling Stock	
14. Responsible Person - Person who will be directly working on the Action Plan (Name, Title, Department) Rasheem Alston Supervisor NRV Fleet Operations Asset Management- Rolling Stock and Bre Diaz Sr. Project Control Coordinator – NRV Asset Management – Rolling Stock	

**Blocks 1 thru 9 to be completed by Auditors**

1. Audit Title: Finding 2: Driver Eligibility Monitoring Relies on Manual Processes	2. Audit Title/Project Code: 2025-02	3. Issue Code: F-NRV-25-02
4. Auditor Name: Heather Wright, Audit Deputy Director		5. Issued Date: October 16, 2025
6. Finding Description: Agency Policy 607 and the NRV Fleet Plan require drivers to maintain a valid MVR to retain NRV privileges. MVR checks are conducted through an external vendor, typically at onboarding or annually, and authorization is mandatory. However, there is no automated process to suspend access when MVRs or insurance coverage lapses. Communication between Fleet, People & Culture (P&C), and Risk Management relies on manual steps, with unclear follow-up procedures. Drivers operating NRVs under KCM procedures are overseen externally, and it is unclear whether eligibility monitoring is consistently enforced or integrated with ST systems. This creates a gap in visibility and control over driver compliance for a significant portion of the NRV fleet. 6a. Recommendation: To address this, the agency should implement automated alerts and a shared dashboard showing real-time MVR and insurance status. NRV fleet access should be suspended immediately when clearance lapses, and documented procedures should guide how Fleet, P&C, Risk, and external partners manage these situations.		
7. Assigned Responsible Dept/Division: Service Delivery		8. Response Due Date: November 7, 2025

Management Response

9. Does management agree with the finding? Yes: ☒ (comments are optional) No: ☐ If "No", provide comments below: Comments:	
10. Does management agree to implement the recommendation? Yes: ☒ No: ☐ Action Plan, if different from recommendation: Estimated Date of Completion: June 30, 2026	
11. Manager Response Form Completed By: (Name, Title, Department) Rasheem Alston Supervisor NRV Fleet Operations Asset Management- Rolling Stock	12. Today's Date: October 17, 2025
13. Responsible Executive: (Name, Title, Department) George McGinn Executive Operations Director-Light Rail SDD-Rolling Stock	



14. Responsible Person - Person who will be directly working on the Action Plan (Name, Title, Department) Rasheem Alston Supervisor NRV Fleet Operations Asset Management- Rolling Stock and Bre Diaz Sr. Project Control Coordinator – NRV Asset Management – Rolling Stock	
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**Blocks 1 thru 9 to be completed by Auditors**

1. Audit Title: Finding 3: Lack of Defined Process for NRV Exceptions and Approvals	2. Audit Title/Project Code: 2025-02	3. Issue Code: F-NRV-25-03
4. Auditor Name: Heather Wright, Audit Deputy Director		5. Issued Date: October 16, 2025
6. Finding Description: Agency Policy 607 and the NRV Fleet Plan both allow for exceptions and approvals—such as urgent personal use, take-home privileges, contractor access, and parking passes. While the Fleet Plan includes templates for some requests, neither document explains how employees should submit these requests or how the agency should retain the related records. There is no centralized process or system requirement for tracking approvals, and retention standards are not defined. As a result, approvals may be documented in different places—or not at all—making it difficult to confirm compliance later. This gap exists because the policy and fleet plan focus on authority and criteria but do not link these to operational workflows or recordkeeping requirements. There is no mandate to store approvals in the fleet management system or specify retention timelines. The risk is that exceptions could be granted informally, leading to unauthorized vehicle use and reduced accountability. 6a. Recommendation: To address this, the agency should align Policy 607 with the NRV Fleet Plan by explicitly referencing approval and exception workflows. All approvals and exceptions should be documented and stored in the agency's fleet management system with clear retention periods and ownership to ensure consistency, auditability, and transparency.		
7. Assigned Responsible Dept/Division: TBD		8. Response Due Date: November 7, 2025

Management Response

9. Does management agree with the finding? Yes: ☒ (comments are optional) No: ☐ If "No", provide comments below: Comments:	
10. Does management agree to implement the recommendation? Yes: ☒ No: ☐ Action Plan, if different from recommendation: Estimated Date of Completion: June 30, 2026	
11. Manager Response Form Completed By: (Name, Title, Department) Rasheem Alston Supervisor NRV Fleet Operations Asset Management- Rolling Stock	12. Today's Date: October 17, 2025



13. Responsible Executive: (Name, Title, Department) George McGinn Executive Operations Director-Light Rail SDD-Rolling Stock	
14. Responsible Person - Person who will be directly working on the Action Plan (Name, Title, Department) Rasheem Alston Supervisor NRV Fleet Operations Asset Management- Rolling Stock and Bre Diaz Sr. Project Control Coordinator – NRV Asset Management – Rolling Stock	

**Blocks 1 thru 9 to be completed by Auditors**

1. Audit Title: Finding 4: Fuel Card and Maintenance Controls Lack Integration	2. Audit Title/Project Code: 2025-02	3. Issue Code: F-NRV-25-04
4. Auditor Name: Heather Wright, Audit Deputy Director		5. Issued Date: October 16, 2025
6. Finding Description: Agency Policy 607 and the NRV Fleet Plan expect fuel cards to be used responsibly and vehicles to be maintained in a timely manner. The FTA's TAM Rule also requires agencies to keep non-revenue vehicles in a state of good repair. Maintenance tracking, however, relies on manual reminders and user follow-through. Although service intervals are defined, there's no automated validation against vehicle usage data, and no system-level reconciliation between mileage, fuel use, and maintenance needs. These gaps can lead to delayed service and missed issues, which may compromise vehicle safety and limit the agency's ability to meet TAM requirements. Fuel card purchases are also managed through manual processes. They are not linked to GPS or driver identity, and there are no automated alerts or transaction limits. Oversight depends on monthly statement reviews, which limits visibility and increases the risk of fraud, waste, and abuse—especially if cards are used for personal or non-fleet-related purchases. 6a. Recommendation: To reduce risk and improve oversight, the agency should integrate fuel card data with vehicle usage logs, implement automated exception reporting, and define transaction limits and merchant controls. Maintenance tracking should also be strengthened through automated alerts and better system integration to ensure vehicles are serviced on time and remain safe to operate.		
7. Assigned Responsible Dept/Division: TBD		8. Response Due Date: November 7, 2025

Management Response

9. Does management agree with the finding?

Yes: ☒ (comments are optional)No: ☐ If "No", provide comments below:

Comments: This is actually in the works, as we are working with our Geotab team to help get this going.

10. Does management agree to implement the recommendation?

Yes: ☒No: ☐

Action Plan, if different from recommendation:

Estimated Date of Completion: June 30, 2026



11. Manager Response Form Completed By: (Name, Title, Department) Rasheem Alston Supervisor NRV Fleets Ops – Asset Management – Rolling Stock	12. Today's Date: October 17, 2025
13. Responsible Executive: (Name, Title, Department) George McGinn, Executive Operations Director-Light Rail SDD-Rolling Stock	
14. Responsible Person - Person who will be directly working on the Action Plan (Name, Title, Department) Rasheem Alston Supervisor NRV Fleet Operations Asset Management- Rolling Stock and Bre Diaz Sr. Project Control Coordinator – NRV Asset Management – Rolling Stock	