



Performance Report

November 29, 2022

Transit Performance Review

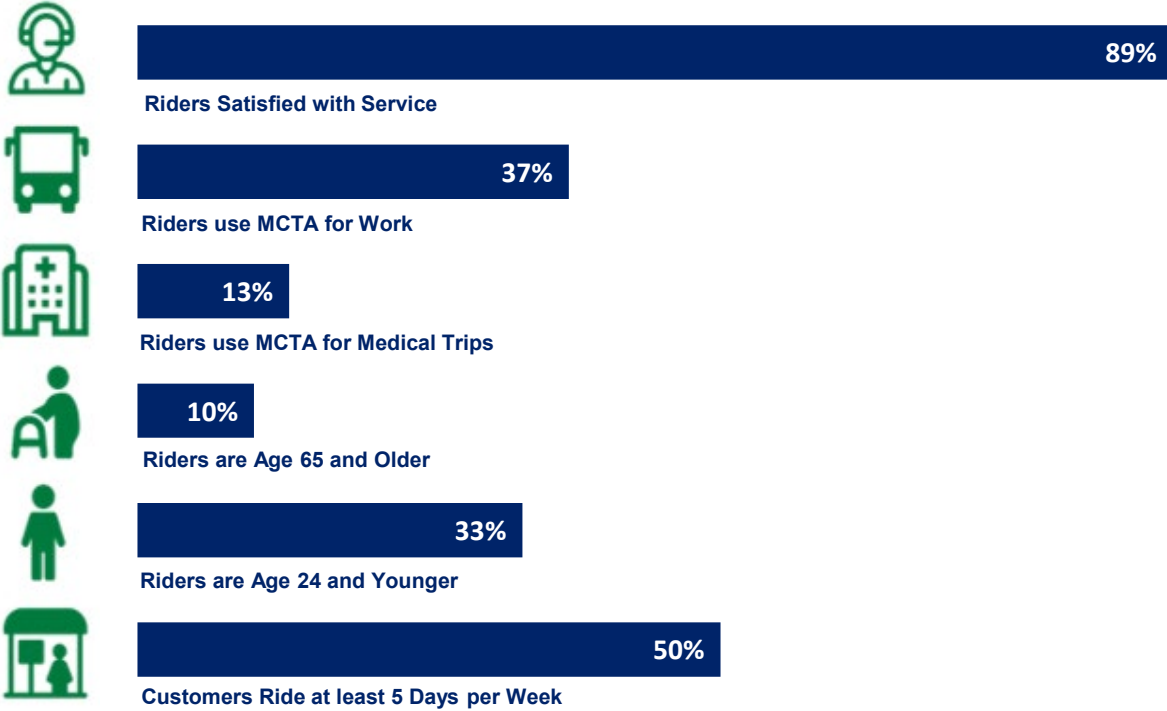
**Monroe County Transit Authority
(d.b.a., MCTA)**

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MONROE COUNTY TRANSIT AUTHORITY (MCTA) PERFORMANCE REVIEW EXECUTIVE SUMMARY



FIXED-ROUTE RIDER PROFILE



Source: 2016 Customer Satisfaction Survey

COMMUNITY IMPACTS

SOCIAL



50,274 Paratransit Trips (FYE 2021)



Source: 2017 Customer Satisfaction Survey and FYE 2016 & 2021 dotGrants Reporting

COMMUNITY IMPACTS

ECONOMIC







\$1.3M Spent doing Business With Pennsylvania Vendors (FYE 2021)



\$1.2M Operator Salaries & Wages (FYE 2021)
\$24.56 Average Fixed-Route Hourly Driver Wage (FYE 2021)

Sources: FYE 2021 dotGrants and Agency Reporting

ACT 44 PERFORMANCE METRICS

	TARGET (2020)	ACTUAL (2020)	CURRENT (2022)	FUTURE (2027)
 <p>INCREASE Passengers / RVH</p>	8.45	9.40	10.51	10.77
 <p>CONTAIN Operating Cost / RVH</p>	\$101.81	\$125.40	\$149.52	\$173.33
 <p>INCREASE Operating Revenue / RVH</p>	\$10.90	\$11.58	\$18.84	\$21.84
 <p>INCREASE Operating Cost / Passenger</p>	\$12.06	\$13.34	\$14.23	\$16.10

Note: MCTA began to experience the impacts of COVID-19 on ridership, revenue, and operating costs in March 2020.

BEST PRACTICES

- Developed rider profiles to define target segments for increasing ridership
- Secured route guarantees to offset the cost of new seasons service
- Maintains a robust maintenance program that ensures the fleet operates safely with minimal breakdowns

OPPORTUNITIES FOR IMPROVEMENT

- Update service standards
- Analyze farebox recovery at the route level
- Establish cost parameters to gauge the sustainability of alternative service types
- Develop a safety strategy to reduce personal property and liability claims
- Develop a succession plan for critical positions

MCTA PERFORMANCE REVIEW EXECUTIVE SUMMARY



Other Fixed-Route Performance Statistics	FYE 2016	FYE 2021
Operating Revenue / Operating Cost	10.4%	7.1%
Operating Cost / Total Vehicle-Hours	\$85.56	\$128.45
Operating Cost / Total Vehicle-Miles	\$4.92	\$7.20
Total Passengers / Total Vehicle-Hours	7.41	6.24
Operating Cost / RVM	\$5.53	\$7.80
RVM / Total Vehicle-Miles	88.9%	92.3%
RVH / Total Vehicle-Hours	87.9%	94.8%
Operating Subsidy / Passenger Trips	\$9.83	\$19.13
Farebox Recovery	9.9%	6.6%

Note: Does not include ADA Paratransit Operating Statistics

Fixed-Route Annual Operating Statistics	FYE 2016	FYE 2021
Vehicles in Maximum Service (VOMS)	10	7
Operating Cost	\$2,907,819	\$2,940,006
Operating Revenues	\$303,565	\$208,438
Operating Subsidies	\$2,476,358	\$2,731,568
Total (Actual) Vehicle-Miles	591,593	408,317
Revenue Vehicle-Miles (RVM)	525,988	376,784
Total Vehicle-Hours	33,987	22,889
Revenue Vehicle-Hours (RVH)	29,869	21,700
Total Passenger Trips	251,796	142,797
Senior Passenger Trips	26,390	19,296

Note: Does not include ADA Paratransit Operating Statistics



MCTA Fixed-Route Bus with Bike Rack

AGENCY TRENDS



Serious Injuries

0.0

Crashes per Million Vehicle Miles Traveled (VMT)



Total Fleet

50

VOMS



Heavy-Duty Bus

31,000

Estimated Annual Miles Per Bus



Van

9,000

Estimated Annual Miles Per Van



Light-Duty Small Bus

30,200

Estimated Annual Miles Per Bus



Spare Vehicle Ratio

44%

Fixed-Route Bus

54%

Shared-Ride Small Bus/Van

Source: Capital Planning Tool and FYE 2021 dotGrants Reporting

HIGH-LEVEL FINANCIAL INDICATORS

FYE 2016

25.4%

FYE 2021

74.1%



Cash Equivalent Balance / Total Operating Expenses

FYE 2016

\$1.14

FYE 2021

\$1.37



Effective Fare (Total Fare Revenue / Passenger Boardings)

Source: dotGrants Reporting

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Preface

Pennsylvania law requires transit agency performance reviews and five-year performance targets to improve the efficiency and effectiveness of service

COVID-19: Transit-dependent populations are bearing a heavy burden

Transit agencies are navigating new demands, lower ridership, and higher costs

PennDOT will reevaluate performance targets when long-term impacts of the pandemic are known

Act 44 of 2007 and Act 89 of 2013 increased funding for public transportation in Pennsylvania. The laws also required transit agencies to improve the efficiency and effectiveness of service delivery through increased ridership, revenue, and cost containment. PennDOT evaluates every fixed-route transit agency in the Commonwealth through a performance review at least once every five years to determine how well the agency satisfies these requirements. Act 44 also requires PennDOT to develop five-year performance targets for each agency as part of the performance review process.

Beginning in February 2020, COVID-19 caused significant social and economic disruptions as workplaces closed and people limited travel and gatherings to reduce the spread of the disease. The adverse impacts throughout the Commonwealth of Pennsylvania were profound. The health and unemployment effects of COVID-19 disproportionately impacted senior, disabled, and low-income populations. These individuals rely heavily on public transportation to meet their essential travel needs.

The impacts of COVID-19 on the public transportation industry were also severe. Ridership decreased by more than 90 percent at some agencies during April 2020. Revenues dropped as agencies opted to waive fares to limit bus driver interactions and possible disease transmission from handling tickets and currency. Agencies increased the frequency and extent of bus cleaning, which increased operating costs. Some agencies furloughed drivers as they reduced service in response to plummeting passenger demand.

By late Summer 2020, transit agencies had begun to stabilize from the initial impacts of COVID-19, only to have statewide infection rates soar in the fall and winter. As of July 2022, the pandemic is ongoing, and its long-term effects on transit remain unknown. Social distancing guidelines could cause transit agencies to limit the number of passengers on buses and rail for years. Many of the ridership, revenue, and operating cost trends used to develop this transit performance review report, including five-year performance targets, rely on information that predates the pandemic. PennDOT will continue to monitor the impacts of COVID-19 and reassess the transit agency's five-year performance targets when the long-term effects of the pandemic are known. If the performance targets are revised, they will be published as an addendum to this report.

Introduction

Purpose

Act 44 requires local transportation organizations that receive state operating assistance to participate in periodic reviews to assess agency performance. PennDOT established a framework for conducting performance reviews with local transportation organizations to:

- Assess efficiency and effectiveness of service, financial stability, and general management/business practices;
- Agree to five-year targets for Act 44-mandated performance criteria;
- Assist agencies in developing an action plan which addresses opportunities for improvement and strategies to achieve performance targets;
- Provide technical assistance to implement the plan at the request of the transportation organization; and
- Reassess each organization on a five-year cycle.

The reassessment at the end of each five-year cycle evaluates:

- Whether the organization met the agreed-upon performance targets; and
- The sufficiency and effectiveness of actions taken by the organization to improve performance and management practices in its efforts to meet performance targets.

This report summarizes the review of the Monroe County Transit Authority (MCTA, d.b.a. Pocono Pony) conducted in the winter of 2021-2022.

Performance Review Process Steps

The performance review process is a collaborative effort between the transit agency and PennDOT.

As shown in **Exhibit 1**, the performance review process assesses MCTA's unique challenges, changes since the previous performance review, the accuracy and reliability of reported data, implemented practices, additional opportunities for improvement, and realistic targets to attain before the next review.

Exhibit 1. Performance Review Process Steps

1.	Notify agency of performance review schedule and request supporting documents.
2.	Review available data and request additional information.
3.	Agree upon a set of peer agencies for comparison.
4.	Review the most recent customer satisfaction survey.
5.	Assess Act 44 variables, including current performance, targets from the previous review, and Action Plan implementation.
6.	Conduct Act 44 performance criteria analysis.
7.	Interview agency management, staff, and governing body.
8.	Perform supplementary data collection and reconciliation.
9.	Evaluate performance, financial management, and operations.
10.	Report results and determine agency compliance with performance requirements.
11.	Develop the performance report.
12.	Develop, implement, and monitor a five-year Action Plan.
13.	Provide technical assistance, if required, to help meet five-year performance targets.

Key to Responsibilities: **PennDOT** **PennDOT + Transit Agency** **Transit Agency**

Agency Overview

Established in 1979, MCTA is governed by a Board of Directors appointed by the Monroe County Board of County Commissioners. Known locally as the “Pocono Pony,” MCTA provides fixed-route bus and demand-response transportation in Monroe County, PA. The area, designated by FTA as urbanized¹, is served by fixed-route buses (Exhibit 2) and is concentrated along Route 611 between the Delaware Water Gap and Tobyhanna, PA. MCTA offers countywide paratransit for seniors, qualifying persons with disabilities, and non-emergency medical trips funded by the Medical Assistance Transportation Program (MATP). In 2019, MCTA introduced Flex service, replacing low-ridership fixed routes operating in rural portions of Monroe County with scheduled trips at designated stops on shared-ride vehicles. On August 1, 2022, MCTA launched the PonyPlus, a micro-transit service with same-day reservations booked through a mobile phone application for first/last mile connections. The service is not available in the entire county, but it is available in two approximately 25-square mile areas known as the Tri-Boro Connector (Stroudsburg, East Stroudsburg, and Delaware Water Gap) and the Pocono Summit Connector (Pocono Summit and Mt. Pocono).

Exhibit 2. MCTA Fixed-Route Bus



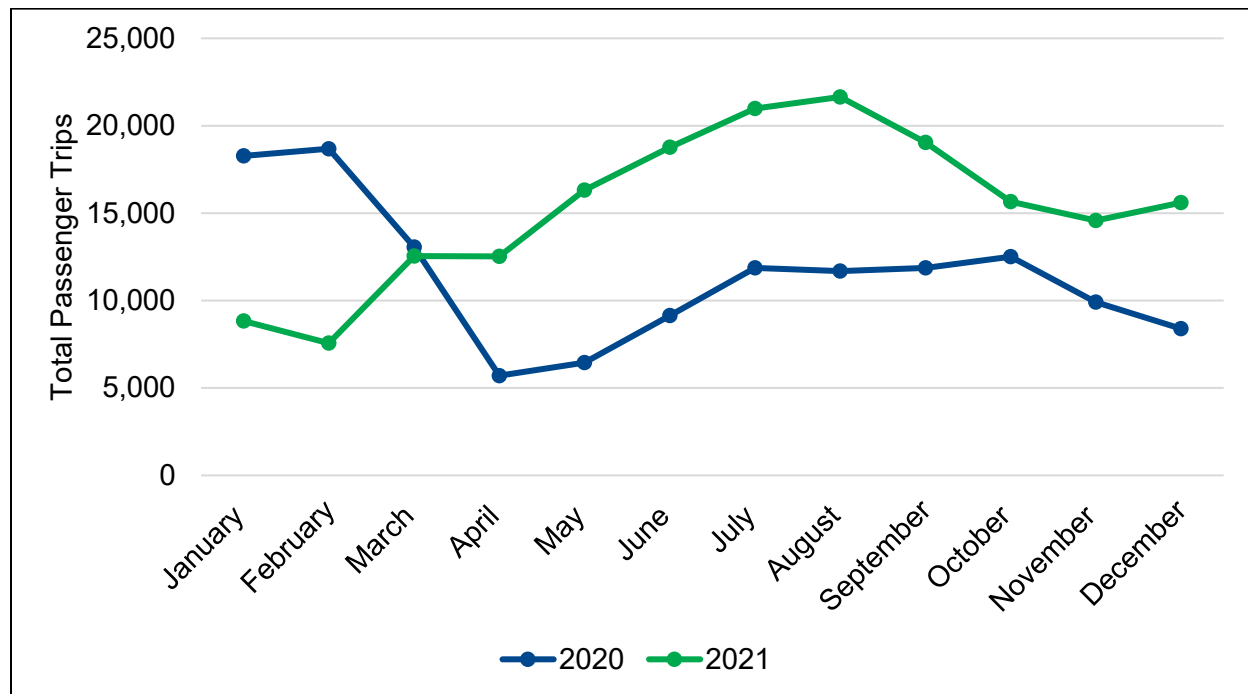
In Fiscal Year (FY) 2020-21, MCTA had seven fixed-route vehicles operated in maximum service (VOMS) and provided 142,797 total fixed-route passenger trips. MCTA operated 20 VOMS for demand-response service and delivered 2,556 complementary ADA and 47,691 shared-ride trips. Of the 47,691 shared-ride trips, 12,012, or 25 percent, were paid by the Medical Assistance Transportation Program (MATP). MCTA also provides non-public

¹ The Federal Transit Administration (FTA) defines a small urbanized area as an incorporated area with a population of 50,000 or more but less than 200,000.

transportation trips not offered under the shared-ride fare structure. These trips are typically for non-emergency medical transportation, consisting of non-public MATP trips.

Like most transit systems nationally and across Pennsylvania, the COVID-19 pandemic impacted MCTA’s ridership beginning in March 2020. Monthly fixed-route ridership improved, beginning in March of 2021 ([Exhibit 3](#)).

Exhibit 3. Monthly Fixed-Route Ridership, January 2020 through December 2021



Community Impacts

Public transportation is a vital service to the community providing mobility options and access to jobs, medical facilities, food stores, schools, and other economic destinations.

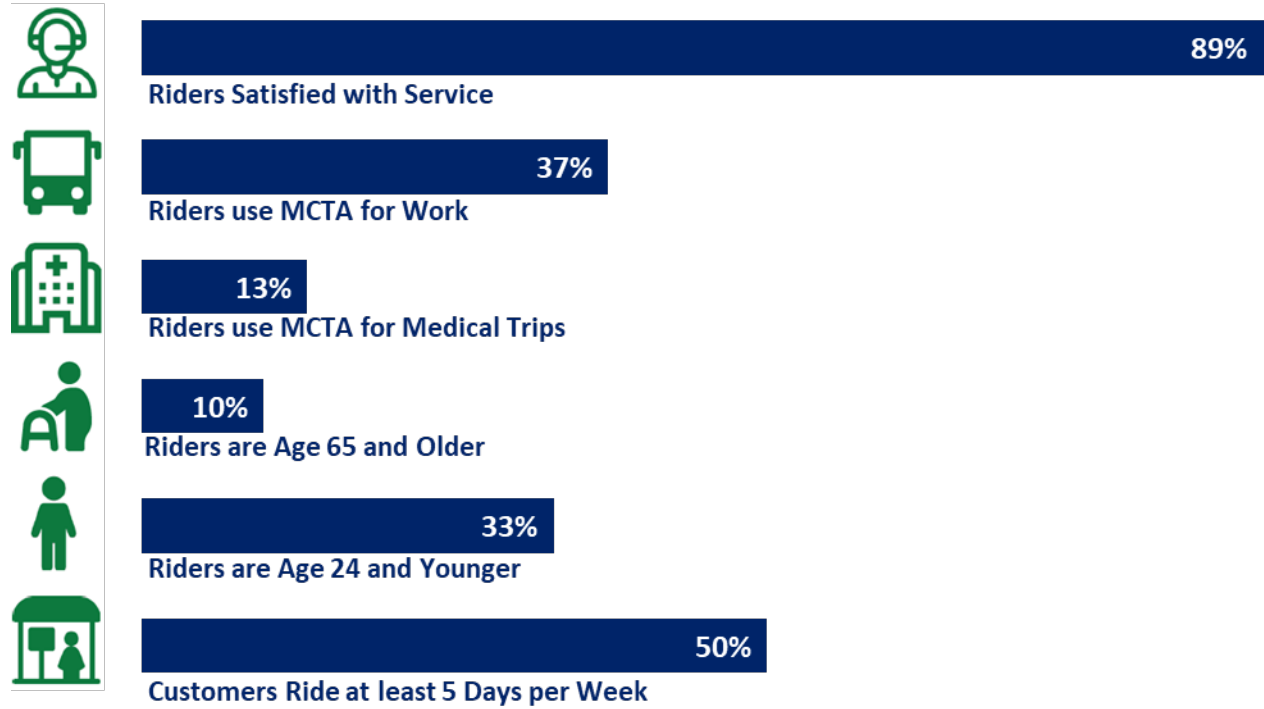
The COVID-19 pandemic highlighted the critical nature of public transportation to individuals and their communities. Essential workers and those most reliant on public transportation services continued to ride throughout the pandemic.

Customer Satisfaction Survey

MCTA last conducted a customer service satisfaction survey (CSS) in 2016 (September 9-16). The survey results were aggregated to determine average satisfaction scores. Top-ranked measures included: safe and confident drivers, driver courtesy and friendliness, and availability of seats on the bus. Lowest-ranked measures included: weekend service frequency, comfort at bus stops, and on-time arrivals and departures.

The CSS also provided insight into rider characteristics and preferences. As shown in [Exhibit 4](#), MCTA had 89 percent rider satisfaction, with 37 percent of riders using fixed-route service for transportation to work and 13 percent riding for medical trips. Seniors represented 10 percent of fixed-route riders, and 50 percent of customers used MCTA at least five days per week.

Exhibit 4. Fixed-Route Rider Profile



Source: 2016 MCTA Customer Satisfaction Survey Report; Data Centric Services.

Economic and Social Impacts

MCTA benefits the local economy and the communities it serves through the expenditure of public funds that directly support jobs in transit operations and by purchasing goods and services. MCTA plays a vital role in the community by providing public transportation services, measured by annual fixed-route and demand-response trips (**Exhibit 5**).

MCTA paid \$1.3 million to Pennsylvania-based businesses for various services and purchased goods to support operating activities in FY 2020-21. The agency spent \$2.4 million on staff wages: \$1.1 million for operations, \$727,912 for maintenance, and \$844,531 for administration. As of June 2022, MCTA employed 52 individuals, including 14 full-time and two part-time fixed-route drivers. MCTA also had eight full-time shared-ride operators. Excluding overtime pay, MCTA's \$24.56 average hourly fixed-route driver wage roughly equals an annual income of \$51,000.

**Fixed-route customers rode
MCTA for 1,062,409 passenger-
miles in FYE 2021.**

Based on an estimated 755 pre-pandemic unique riders and a total of 1,964,426 passenger miles, each fixed-route passenger took an average of 333 trips and rode MCTA for 762 total miles during FYE 2019. MCTA reported 1,062,409 fixed-route passenger miles in FYE 2021 and had 79 percent on-time² bus departures.³

In FY 2020-21, MCTA provided 50,247 paratransit trips⁴, with 49 percent of total trips taken by seniors funded by the lottery shared-ride program. The remaining 51 percent of paratransit trips consisted of 2,556 ADA trips, 10,847 Persons with Disabilities (PwD) trips, and 12,012 other trips (mostly MATP). In 2021, 81 percent of paratransit pick-ups were on time.

² On-time performance is a service reliability measure based on when a vehicle arrives within a certain range of its scheduled arrival.

³ MCTA defines "on-time" as zero to ten minutes within scheduled arrival time.

⁴ MCTA's paratransit trips classified as "non-public transportation" are reported separately from publicly funded demand-response programs.

Exhibit 5. Economic and Social Measures



ECONOMIC



\$1.3M Spent doing Business
With Pennsylvania Vendors (FYE 2021)



\$1.2M Operator Wages & Other Paid Absences (FYE 2021)



\$24.56 Average Fixed-Route Hourly Driver Wage (FYE 2021)

SOCIAL



251,527 Fixed-Route Trips (FYE 2019)



333
Annual Trips per
Rider (FYE 2019)



762
Annual Miles per
Rider (FYE 2019)



50,274 Paratransit Trips (FYE 2021)



On-Time Performance
(FYE 2021)

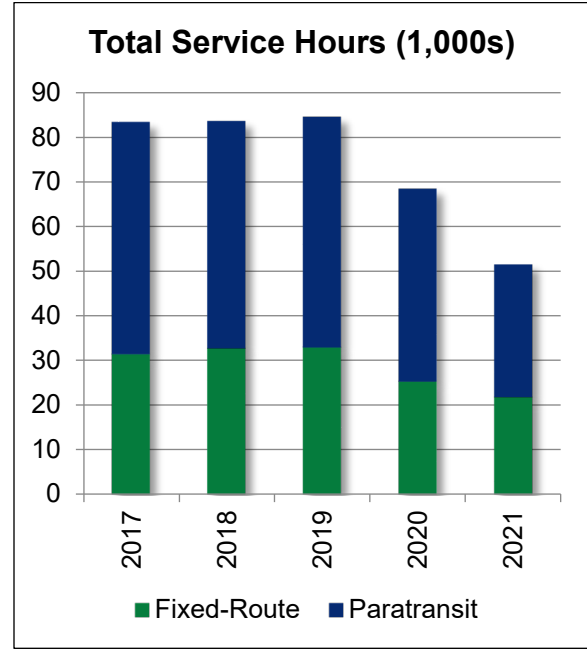
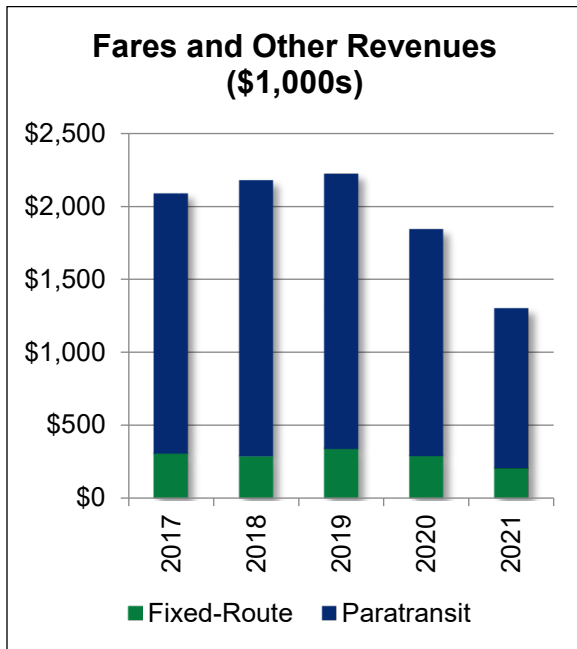
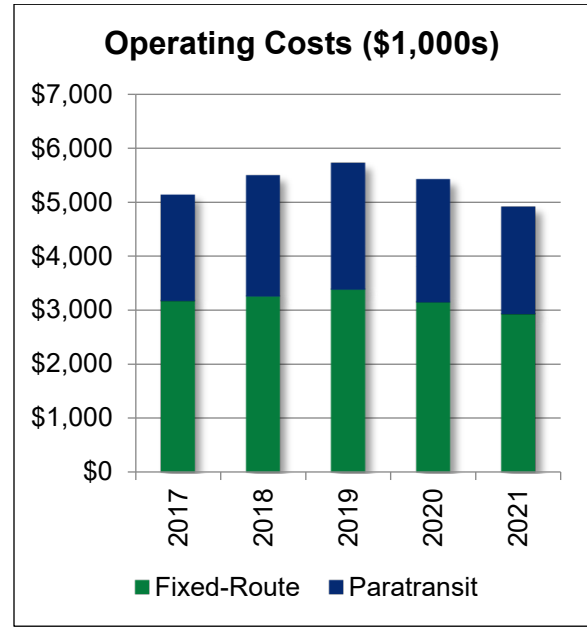
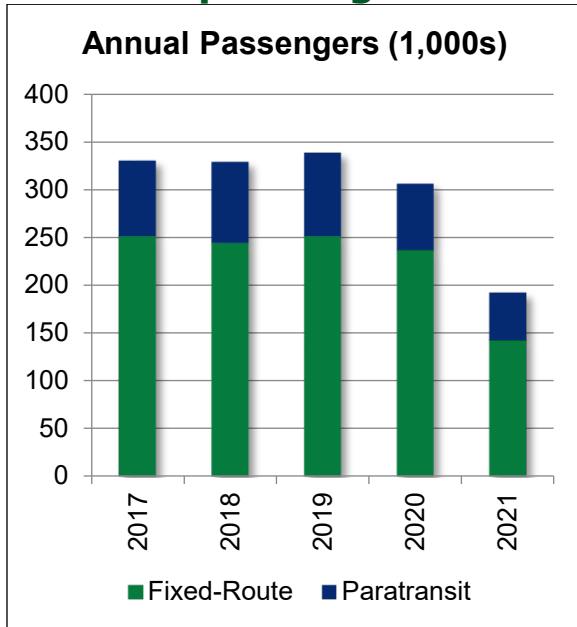
86%
Fixed-Route
On-Time Performance

91%
Paratransit
On-Time Trip Pick-Ups

Source: FYE 2021 dotGrants and agency reported values.

Agency Trends

Annual Operating Statistics



Note: **Appendix A: Data Reconciliation** on page 23 provides dotGrants and National Transit Database (NTD) reconciled values.

Financial Health

Transit agencies in good financial health typically have diverse revenue streams, maintain sufficient operating reserves, and prioritize long-term fiscal sustainability.

MCTA operated with a balanced budget during FYE 2021 (**Exhibit 6**). Total transportation services cost approximately \$5.1 million to operate. MCTA earned \$1.5 million in revenues and required \$3.6 million in subsidies to offset operating deficits.

Exhibit 6. FYE 2021 Operating Budget Summary

Fiscal Year 2020-21	Fixed-Route	ADA	Shared-Ride	Non-Public Other Transportation	Total
Total Operating Expenses	\$2,940,006	\$41,365	\$1,933,011	\$166,135	\$5,080,517
Total Revenue	\$208,438	\$6,151	\$1,088,956	\$166,135	\$1,469,680
Total Federal Subsidies	\$2,502,242	\$35,214	\$844,055	\$0	\$3,381,511
Total State Subsidies*	\$0	\$0	\$0	\$0	\$0
Total Local Subsidies	\$229,326	\$0	\$0	\$0	\$229,326

*Note: Additional federal funding, including pandemic relief packages received in FYE 2021, enabled MCTA to save its \$2.2 million annual state 1513 operating subsidy as carryover for future years.

As shown in **Exhibit 7**, as of FYE 2021, MCTA had carryover subsidies (cash reserves) equal to 68.3 percent of its total annual operating costs, exceeding the 25% goal for liquidity. Federal COVID relief funds for operating expenses enabled MCTA to reserve its state operating funds as carryover into the next fiscal year. In FYE 2019, cash reserves equaled 13.7 percent of total annual operating costs.

MCTA maintains a \$650,000 line of credit for short-term cash flow purposes. As of FYE 2021, MCTA had no outstanding balance on its line of credit, no long-term debt, and no accounts payable or receivable over 90 days past due.

Before the pandemic, MCTA had a fixed-route farebox recovery ratio of 9.5 percent. For the fiscal year ending June 30, 2021, operating revenues recovered 5.9 percent of annual fixed-route operating costs. This loss in passenger revenues required an increase in operating subsidies to offset the loss of farebox recovery. MCTA's operating subsidy per fixed-route passenger trip increased from \$12.12 in FYE 2019 to \$19.13 in FYE 2021. MCTA had rebounded to 76 percent of its pre-COVID-19 ridership as of November 2021.

MCTA's effective average fixed-route fare increased between FYE 2019 and FYE 2021 from \$1.08 to \$1.37. Passenger fares declined 39 percent from approximately \$323,000 to \$195,210, and passenger trips decreased 43 percent from 251,000 trips to 143,000 trips.

Exhibit 7. High-Level Financial Indicators

Indicator	Value		Assessment Criteria / Rationale	Source
	FYE 2019	FYE 2021		
Total Carryover Subsidies / Annual Operating Cost	FYE 2019	FYE 2021	A combined target of 25%+ provides liquidity to cover unexpected cost increases or service changes without incurring interest fees from loans.	FYE 2021 Audit
	13.7%	68.3%		
Credit Available/ Annual Payroll	23.9%		Only necessary if combined carryover subsidies are less than 25% of annual operating costs. This ensures that the agency maintains sufficient cash flow and liquidity to pay all current bills.	FYE 2021 Audit and PennDOT dotGrants
Accounts Payable (AP) 90+ days	0.0%		Target should be 0% over 90 days. Larger values indicate cash flow concerns.	August 2021 AGENCY-reported value
Accounts Receivable (AR) 90+ days	0.0%		Target should be 0% over 90 days. Larger values can cause cash flow problems.	August 2021 AGENCY-reported value
Debt / Annual Operating Cost	0.0%		Target should be 0%. Low debt amounts reduce interest expenses.	FYE 2021 Audit
Farebox Recovery	FYE 2019	FYE 2021	The drop in ridership associated with the COVID-19 pandemic significantly reduced farebox recovery.	FYE 2021 Audit and PennDOT dotGrants
	9.5%	6.6%		
Effective Average Fare	FYE 2019	FYE 2021	Total fare revenue / total passengers. Effective fare calculates the actual value of fares per passenger trip and indicates when fares might need adjustment to offset increases in operating costs.	FYE 2021 Audit and PennDOT dotGrants
	\$1.08	\$1.37		
Fixed-Route Operating Subsidy per Passenger Trip	FYE 2019	FYE 2021	Indicates the subsidy requirement to offset operating losses per passenger trip.	FYE 2021 Audit and PennDOT dotGrants
	\$12.12	\$19.13		

Safety

Federal transportation legislation requires a holistic, performance-based approach to Safety Management Systems (SMS). MCTA adopted its Public Transportation Agency Safety Plan (PTASP) in August 2020, as required by 49 CFR Part 673 for agencies that receive Section 5307 funding. The PTASP includes safety performance targets based on the federal measures established in the National Public Transportation Safety Plan and additional safety metrics self-reported by the agency. Agencies develop safety targets based on three-year historical averages.

As shown in **Exhibit 8**, MCTA met most annual safety targets. MCTA had no fatalities, but two serious injuries occurred on fixed-route buses and two on shared-ride vehicles. MCTA maintained its system reliability for shared-ride. Although MCTA was below its system reliability target in FYE 2021 for fixed-route, MCTA decreased the distance between major mechanical breakdowns to 10,075 miles compared to a four-year historical average of 8,487 miles.

Exhibit 8. PTASP Annual Safety Performance Targets and FYE 2021 Results

Safety Targets	Fixed-Route		Shared-Ride	
	Target	Results	Target	Results
Fatalities	0	0	0	0
Serious Injuries	2	2	0	0
Safety Events ⁵	2	2	2	2
System Reliability ⁶	12,000	10,075	17,000	29,680

Capital Asset Management

PennDOT verifies asset conditions by reviewing Capital Planning Tool (CPT) records and interviewing transit agency management, operations, and maintenance staff. Transit Asset Management (TAM) is a systematic process that allows agencies to track assets, forecast asset conditions, and plan for asset maintenance or replacement. This FTA-required process accounts for the entire life cycle of a capital asset (e.g., facilities, equipment, rolling stock, infrastructure, etc.) used for public transportation, from procurement through operations and maintenance to disposal. A critical element of the TAM process is the inventorying and assessment of asset conditions.

Detailed inventories of the fleet and other capital assets indicate when management should plan to replace these items. This process is critical for efficient coordination with local funding contributors. PennDOT recognizes a revenue vehicle asset as eligible for replacement when it reaches its useful life in years and miles. The estimated service life (ESL) for a vehicle depends on its size, fuel type, and seating capacity:

⁵ NTD defines safety events as a collision, derailment, fire, hazardous material spill, an act of nature (Act of God), evacuation, or other safety occurrences not otherwise classified (OSONOC) occurring on a transit right-of-way, in a transit revenue facility, in a transit maintenance facility, or involving a transit revenue vehicle and meeting established NTD thresholds.

⁶ System reliability is expressed in miles and is the average distance between major mechanical failures that prevent a vehicle from completing a revenue trip.

- Large, heavy-duty bus ESL is 500,000 miles and 12 years;
- Medium-duty bus ESL is 350,000 miles and ten years;
- Light-duty bus ESL is 150,000 miles and five years; and
- Van ESL is 100,000 miles and four years.

As of May 2022, MCTA had a fleet of 54 total vehicles. The fleet consists of heavy-duty buses, light-duty buses, and vans. As shown in **Exhibit 9**:

- Heavy-duty buses accumulated, on average, 31,100 annual miles;
- Light-duty buses accrued an average of 30,200 annual miles; and,
- Vans had an average of 10,300 annual miles.

Exhibit 9. 2022 Fleet Utilization

Vehicle Type	Fleet	ESL Requirements		Annual Miles	
		Years	Miles	Average	ESL
Heavy-Duty Bus	15	12	500,000	31,100	42,000
Light-Duty Bus	35	5	150,000	30,200	30,000
Van	4	4	100,000	9,000	25,000

Based on current odometer readings and estimated yearly mileage, MCTA’s light-duty buses are within an acceptable range for replacement within five years. MCTA’s heavy-duty buses and vans accumulated less than 42,000 and 25,000 annual miles, meaning they will remain in service beyond twelve and four years.

If current utilization levels continue, MCTA should:

1. Ensure preventative maintenance occurs on time to operate vehicles safely past their estimated useful life in years.
2. Consider assessing the minimum fleet size and potential vehicle type (e.g., heavy-duty bus, light-duty bus, and vans) to optimize for ESL based on utilization and passenger demand.

Act 44 Performance Review Findings

Prior Performance Reviews

MCTA took action to increase fixed-route ridership and revenues and contain growth in operating costs. As recommended in previous action plans, MCTA took the following steps to improve its performance:

- Monitor the efficiency of marketing activities and adjust resources accordingly.
- Coordinate with Monroe County to address limitations on system access.
- Routinely evaluate existing services for opportunities for improvement.
- Pursue development of route guarantees with local colleges and major employment centers.
- Expand draft IT plan to identify new opportunities, current deficiencies, and the cost of potential investments.
- Develop actions for implementation and measures of effectiveness for the Strategic Plan update.
- Analyzed an official succession plan for essential management functions.
- Develop strategies to address the challenges of transitioning from rural to urban status.
- Develop an actionable development plan for the parcel adjacent to MCTA's headquarters.

Current Performance Assessment and Findings

The current performance assessment reviews the agency's progress in achieving its five-year performance goals and identifies additional steps to improve performance. The 2017 performance report established performance targets for the fiscal year ending on June 30, 2020, based on the following annual goals (**Exhibit 10**):

- Increase passengers per revenue vehicle hour by 3.0 percent per year;
- Increase operating revenue per revenue vehicle hour by 3.0 percent per year;
- Contain growth in operating costs per revenue vehicle hour to 3.0 percent per year; and
- Maintain 0.0 percent growth in operating cost per passenger annually.

Exhibit 10. FYE 2020 Performance Assessment

Act 44 Performance Metrics	Annual Performance Goals	Performance Assessment	
		FYE 2020 Target	FYE 2020 Actual
Passengers/RVH	3.00%	8.45	9.40
Operating Revenue/RVH	3.00%	\$10.90	\$11.58
Operating Cost/RVH	3.00%	\$101.81	\$125.40
Operating Cost/Passenger	0.00%	\$12.06	\$13.31

In addition to completing the 2017 Action Plan, steps MCTA took to improve agency performance included:

- Created a Government Support Administrator (GSA) to assist with grants and stakeholder reporting, including Act 44 quarterly updates;
- Hired a part-time accountant with advanced skills to support the Chief Financial Officer (CFO);
- Secured services of a certified public account (CPA) through a memorandum of understanding (MOU) to upgrade and streamline financial processes;
- Received FTA approval to permit data collection of unlinked passenger trips using automatic passenger counters (APC);
- Developed a working committee to conduct data analyses on the farebox boardings compared to APC boardings and on-time performance;
- Negotiated a route guarantee with Kalahari Resorts, LLC, to offset the cost of additional service; and,
- Introduced Flex/designated stop shared-ride service to provide transportation in areas where MCTA eliminated unproductive fixed-route service.

The COVID-19 pandemic and resulting changes in travel behavior adversely impacted MCTA's ability to achieve all 2020 performance targets. Although ridership and revenue decreased significantly from March 2020 through June 30, 2020, MCTA met its five-year performance targets for passengers per revenue vehicle-hour and operating revenue per revenue vehicle-hour. However, costs increased due to COVID mitigation measures (e.g., additional cleaning of vehicles, facilities, equipment, etc.). They impacted MCTA's ability to meet its operating cost per revenue vehicle-hour and operating cost per passenger targets.

MCTA cut three unproductive bus routes, but replaced it with flex service as an option to maintain a transportation presence in 2020. This action reduced total revenue vehicle-hours by 23 percent from approximately 33,000 hours in FYE 2019 to 25,000 hours in FYE 2020. Ridership, however, only declined six percent from 252,000 total passenger trips in FYE 2019 compared to 237,000 in FYE 2020. As a result, MCTA's passengers per revenue vehicle-hour increased from 7.7 in FYE 2019 to 9.4 in FYE 2020. Organization-paid fares, like MCTA's revenue agreement with Kalahari Resorts, LLC, represented 30 percent of total fixed-route revenue in FYE 2020.

Future Performance Goals

Background

Act 44 requires that PennDOT and transit agencies establish five-year performance targets for each of the four Act 44 metrics for fixed-route service:

- Passengers per Revenue Vehicle Hour
- Operating Cost per Revenue Vehicle Hour
- Operating Revenue per Revenue Vehicle Hour
- Operating Cost per Passenger

Setting performance targets for these metrics and regularly reevaluating performance is a process intended to improve service delivery effectiveness and efficiency. Act 89 of 2013 requires agencies receiving public transportation assistance to have a policy statement outlining

the basic principles for adjusting fares to meet the inflation rate. Fare adjustment policies should factor in the growth rate in operating costs to ensure long-term financial sustainability. Targets for revenue growth per revenue vehicle hour are linked to cost containment per revenue vehicle hour. The nexus encourages agencies to monitor farebox recovery and ensure that the annual increases in operating expenses do not outpace available income and subsidies.

PennDOT uses the most recent audited and agency-verified values for passenger boardings, operating costs, and operating revenues as the baseline to develop the targets. Five-year targets are then set based on realistic and achievable expectations of improvement.

MCTA Goals for FYE 2027

PennDOT based MCTA’s future-year performance targets on the most recently available financial year (i.e., FYE 2022). These values are unaudited at the time of this performance report; however, management believes FYE 2022 represents a more accurate baseline for establishing performance targets with stabilized revenue vehicle hours compared to the reduced service following the COVID-19 pandemic.

Over the next five years, MCTA must work to achieve the targets shown in **Exhibit 11** to ensure continued eligibility for full Section 1513 funding.

Exhibit 11. FYE 2027 Performance Goals

Performance Criteria	FYE 2022 Unaudited	FYE 2027 Goal	Target Annual Increase
Passengers/RVH	10.51	10.77	0.5%
Operating Revenue/RVH	\$18.84	\$21.84	3.0%
Operating Cost/RVH	\$149.52	\$173.33	3.0%
Operating Cost/Passenger	\$14.23	\$16.10	2.5%

PennDOT will continue to monitor the impacts of COVID-19 and reassess the transit agency’s five-year performance targets when the long-term effects of the pandemic become known. If the performance targets are revised, PennDOT will publish an addendum to this report.

Functional Review

Identifying Opportunities for Improvement and Best Practices

Functional reviews catalog best practices to share with other transit agencies and identify opportunities for improvement to address in the Action Plan.

The performance review process includes a functional review of agency operations, management, and governance. Supporting documents detailing agency policies, programs, and practices, alongside a peer comparison of the Act 44 variables with similar-sized systems, are reviewed to identify areas of interest. The document review and peer comparison findings inform the performance discussions with agency leadership and staff. The outcome of the functional review is a collection of best practices applicable to other Pennsylvania transit agencies and a list of opportunities for retaining and promoting ridership, ensuring long-term financial sustainability, and other opportunities for improvement.

The recommended Action Plan is in **Appendix B: Action Plan Template**, beginning on page 25. The determinations and findings of the Act 44 peer review are in **Appendix C: Act 44 Peer Comparison Analysis**, starting on page 27.

Retain and Promote Ridership

Service must be responsive to community needs to achieve optimum service levels. Before the impact of the COVID-19 pandemic on ridership, transit systems nationwide faced lower ridership as gas prices fell and ridesharing companies competed with fixed-route systems. The rise in work-from-home practices, which increased due to the COVID-19 pandemic, significantly impacted commuter bus and passenger rail markets. As transit agencies work to restore ridership to pre-pandemic levels, actions focusing on raising service awareness, improving the customer experience, and identifying implementable operational efficiencies help retain and promote ridership.

Best Practices

1. **MCTA developed transit rider profiles to define target segments for increasing ridership.** Each profile includes demographic information such as age, gender, home and employment locations, familiarity with MCTA's services, how customers acquire information, transit use challenges, mobile application use, and local-area knowledge. MCTA then launched a campaign targeting specific rider profiles.

Opportunities for Improvement

1. **Update service standards to reflect recent system changes.** Since the 2017 performance report, MCTA has made significant service changes, including new seasonal services and flex zones. On August 1, 2022, MCTA launched the PonyPlus, a micro-transit service that supplements its existing fixed-route service. MCTA should ensure its service standards and productivity metrics reflect the new services offered, including seasonal routes, on-demand flex, and micro-transit.

2. **Consider a Transit Development Plan (TDP) to meet the changing demographics and service needs since the COVID-19 pandemic.** MCTA has adjusted its service to meet the transportation needs of Monroe County. Since the 2016 performance review, MCTA increased ridership by expanding its Silver Line to Kalahari Resorts, LLC. In 2020, MCTA cut unproductive bus service during the COVID-19 pandemic but established flex zones with shared-ride vehicles to maintain a transportation presence. In August of 2022, MCTA launched the PonyPlus, a microtransit service. A TDP would help MCTA guide future service planning efforts in areas where demand warrants potential fixed-route bus service, scheduled flex trips, or on-demand microtransit.
3. **Conduct a customer satisfaction survey (CSS).** MCTA last conducted a PennDOT-sponsored CSS in 2016. As ridership levels stabilize in 2022 and form a new baseline, MCTA should survey its customers to understand recent changes in service use and ridership demographics to identify areas where MCTA can improve the customer experience.

Ensure Long-Term Financial Sustainability

Sound financial management is critical to ensuring the viability of transit services. Agencies often undertake multiple major expenditures on limited budgets. This includes financing major capital projects, purchasing new vehicles, and funding recurring costs, including operations and maintenance, annual fringe benefits, fuel, utilities, and cleaning. Ensuring long-term financial sustainability includes improving farebox recovery, diversifying revenue streams, and identifying and implementing cost control measures.

Best Practices

1. **MCTA secured route guarantees to offset the cost of new seasonal service.** In 2019, MCTA expanded its Silver Line to serve Kalahari Resorts, LLC, in Mount Pocono. MCTA received \$72,000 for expanded service to the resort.
2. **MCTA developed a cost analysis to determine potential savings of converting fixed-route to on-demand flex service.** MCTA converted three unproductive fixed routes to flex service zones after deciding it could operate this new service at a lower cost while continuing to meet rural transportation demand.
3. **MCTA maintains a robust maintenance program that ensures the fleet operates safely with minimal breakdowns.** MCTA's maintenance practices and procedures ensure timely preventative maintenance reducing the "major" mechanical breakdown rate. The Operations Manager regularly briefs the management team on maintenance issues and fleet conditions, which enables MCTA to budget for maintenance appropriately.

Opportunities for Improvement

1. **Analyze farebox recovery at the route level.** MCTA's AVAIL system can track farebox recovery by route—an indicator of financial performance. MCTA could use this information to assess the route-level subsidy by calculating the net operating costs. Tracking route-level farebox recovery would inform MCTA about those that expend more operating subsidies and help management plan for potential service changes and budgets. Farebox recovery should be considered among other variables when assessing

route performance. For example, senior passengers in Pennsylvania do not pay fixed-route fares but can be a significant component of route-level ridership.

2. **Establish cost parameters to gauge the sustainability of alternative service types.** MCTA measured the costs of fixed-route compared to flex service in 2020 which resulted in replacing three underperforming bus routes with three flex zones operated by the existing shared-ride fleet. MCTA should develop cost parameters to determine which service type is most sustainable when assessing potential service models to meet passenger demand. For example, the static cost of a fixed-route bus is mainly a function of total service hours, driver wages, and fuel consumption regardless of the number of passengers. Alternative demand-response models, however, have lower seating capacity (i.e., shared-ride vehicles in use for flex service and microtransit vans) and potentially would require a larger fleet and more drivers to provide adequate coverage and accommodate growing demand. Establishing cost parameters will assist MCTA in optimizing its services for long-term financial sustainability.
3. **Continue pursuing revenue guarantees with local colleges, universities and businesses.** MCTA should continue to pursue service agreements with local colleges as an additional revenue source with built-in cost recovery. Management should engage administrative officials at East Stroudsburg University to understand how to develop a competitive offer for service.
4. **Develop a safety strategy to reduce personal property and liability (PPL) claims.** MCTA has high insurance costs per fixed-route revenue vehicle hour compared to larger neighboring transit systems. In FYE 2019, MCTA incurred \$8.77 per revenue vehicle hour in casualty and liabilities costs, higher than larger adjacent systems such as LANta (\$3.10), LCTA (\$5.26), and COLTS (\$2.55). As of FYE 2022, MCTA's insurance costs increased to \$14.44 per revenue vehicle hour. Management should examine its safety practices and take the appropriate steps to reduce PPL claims.
5. **Identify opportunities to reduce administrative costs.** MCTA has high administrative costs per fixed-route revenue vehicle hour for an agency of its size. "Other Salaries and Wages" totaled \$14.93 per revenue vehicle hour in FYE 2019, higher than neighboring systems that provide more fixed-route service, such as LANta (\$8.10), LCTA (\$6.40), and COLTS (\$11.20). In FYE 2022, MCTA administrative expenses were approximately \$14.00 per revenue vehicle hour, which is high for a system with six VOMS (as of 2022). MCTA should reassess its administrative staffing needs. For example, management could conduct a staff skills audit to identify gaps and opportunities to consolidate staffing resources.

Identify Other Opportunities to Improve Performance

Actions that target organizational improvement help build a more efficient and transparent agency. Other opportunities to improve agency performance, such as strategic planning, workforce development, and advocacy, help drive agency goals and foster support from the community, elected officials, and funding partners. These actions inform decision-making and investment decisions when budgeting for significant capital investments and new information technologies.

Best Practices

1. **MCTA adopted a code of ethics and standards for its Board and senior management.** It contains a statement of values that MCTA is expected to uphold and provides guidance for Board members and staff on conduct during public meetings, interactions while representing MCTA, and conflicts of interest.
2. **MCTA routinely seeks out industry best practices from Pennsylvania peer agencies.** The Executive Director actively engages with peer agencies to identify best practices to address common issues such as data reporting, technology, safety, and implementing new types of service delivery (e.g., same-day, on-demand flex service, and micro-transit). This level of engagement helps MCTA learn from the experiences of other agencies in problem-solving and piloting new initiatives.

Opportunities for Improvement

1. **Develop a succession plan for critical positions.** MCTA has identified several key staff and managers essential to maintaining agency operations. To satisfy basic succession planning principles, MCTA should document plans that accommodate short-term absences and a recruitment process for the Executive Director and other upper management. Once established, MCTA should expand its succession plan to include the roles, responsibilities, and essential duties of other key staff.

Appendix A: Data Reconciliation

The performance review process reconciles NTD data to audited, agency-reported dotGrants legacy budgets to ensure the data presented in this report are consistent, accurate, and correct. Certified audits, financial statements, and other agency-generated reports help identify discrepancies in reported financial data and operating statistics. PennDOT documents data discrepancies and works with agency management to reconcile inconsistencies before determining Act 44 performance metrics and corresponding performance goals.

In FYE 2014, MCTA became an urban system requiring more detailed reporting to NTD. From FYE 2014 through FYE 2019, MCTA only included passenger fares on its F-10 form and reported “other” revenues like organization-paid fares, advertising, route guarantees, etc., as “auxiliary” revenue. PennDOT worked with MCTA management to adjust the NTD revenue report to match dotGrants reports and include “other” sources of fixed-route income in total reported revenue. Other data discrepancies are minor.

Ridership	FYE 2014	FYE 2015	FYE 2016	FYE 2017	FYE 2018	FYE 2019
NTD	244,259	243,101	251,795	251,708	244,545	251,527
dotGrants	244,259	241,555	251,796	251,708	244,545	251,527
Variance	-	(1,546)	1	-	-	-
Adjusted Value	244,259	241,555	251,796	251,708	244,545	251,527
Operating Costs	FYE 2014	FYE 2015	FYE 2016	FYE 2017	FYE 2018	FYE 2019
NTD	\$3,016,429	\$2,945,695	\$2,933,509	\$3,262,407	\$3,348,329	\$3,484,907
dotGrants	\$3,016,429	\$2,911,983	\$2,907,819	\$3,186,126	\$3,265,339	\$3,388,744
Variance	-	(\$33,712)	(\$25,690)	(\$76,281)	(\$82,990)	(\$96,163)
Adjusted Value	\$3,016,429	\$2,911,983	\$2,907,819	\$3,186,126	\$3,265,339	\$3,388,744
Operating Revenue	FYE 2014	FYE 2015	FYE 2016	FYE 2017	FYE 2018	FYE 2019
NTD	\$214,122	\$242,171	\$244,213	\$235,528	\$223,924	\$321,881
dotGrants	\$279,493	\$307,240	\$303,565	\$309,924	\$289,544	\$340,771
Variance	\$65,371	\$65,069	\$59,352	\$74,396	\$65,620	\$18,890
Adjusted Value	\$279,493	\$307,240	\$303,565	\$309,924	\$289,544	\$340,771
Revenue Vehicle-Hours	FYE 2014	FYE 2015	FYE 2016	FYE 2017	FYE 2018	FYE 2019
NTD	30,298	33,157	30,505	31,485	32,570	32,849
dotGrants	30,298	33,157	29,869	31,297	32,570	32,849
Variance	-	-	(636)	(188)	-	-
Adjusted Value	30,298	33,157	29,869	31,297	32,570	32,849

The following Act 44 performance metrics were calculated for MCTA.

Act 44 Adjusted Metrics	FYE 2016	FYE 2017	FYE 2018	FYE 2019	FYE 2020	FYE 2021
Passengers/Revenue Vehicle-Hour	8.43	8.04	7.51	7.66	9.40	6.58
Operating Revenue/Revenue Vehicle-Hour	\$10.16	\$9.90	\$8.89	\$10.37	\$11.58	\$9.61
Operating Costs/Revenue Vehicle-Hour	\$97.35	\$101.80	\$100.26	\$103.16	\$125.40	\$135.48
Operating Cost/Passenger	\$11.55	\$12.66	\$13.35	\$13.47	\$13.34	\$20.59

Appendix B: Action Plan Template

Part 1 – Actions to Retain and Promote Ridership

Recommendations From Narrative starting on page 19.	MCTA Action	Estimated Initiation Date	Estimated Completion Date
1. Update service standards to reflect recent system changes.			
2. Consider a Transit Development Plan (TDP) to meet the changing demographics and service needs since the COVID-19 pandemic.			
3. Conduct a customer satisfaction survey.			

Part 2 – Actions to Ensure Long-Term Financial Sustainability

Recommendations From Narrative starting on page 20.	MCTA Action	Estimated Initiation Date	Estimated Completion Date
1. Analyze farebox recovery to the route level.			
2. Establish cost parameters to gauge the sustainability of alternative service types.			
3. Continue pursuing revenue guarantees with local colleges and universities and businesses.			
4. Develop a safety strategy to reduce personal property and liability (PPL) claims.			
5. Identify opportunities to reduce administrative costs.			

Part 3 – Other Opportunities for Improvement

Recommendations From Narrative starting on page 21.	MCTA Action	Estimated Initiation Date	Estimated Completion Date
1. Develop a succession plan for critical positions.			

Appendix C: Act 44 Peer Comparison Analysis

Peer agencies were identified through a collaborative process between PennDOT and MCTA management using criteria defined in Act 44 and NTD data from the most recently available year, FYE 2019. The systems identified for peer comparisons include:

1. Martin County Public Transit, Stuart, FL
2. City of Nashua, Nashua, NH
3. Michiana Area Council of Governments, South Bend, IN
4. Fayette Area Coordinated Transportation, Lemont Furnace, PA
5. Town of Cary, Cary, NC
6. City of Wichita Falls, Wichita Falls, TX
7. City of Jackson Transportation Authority, Jackson, MI
8. Lake County Board of County Commissioners, Tavares, FL
9. City of Tyler, Tyler, TX
10. City of Ocala, Ocala, FL
11. Lebanon Transit, Lebanon, PA
12. Freedom Transit, Washington, PA
13. Crawford Area Transportation Authority, Meadville, PA
14. Schuylkill Transportation System, St. Clair, PA

Passengers per Revenue Vehicle-Hour: Motor Bus (MB)

System	FYE 2019 Single-Year		Five-Year Change Since FYE 2014		
	Value	Rank of 15	2014 Value	Annual Rate	Rank of 15
Martin County Public Transit	4.32	15	2.89	8.33%	1
City of Nashua	12.56	2	15.65	-4.30%	12
Michiana Area Council of Governments	12.24	3	14.10	-2.79%	9
Fayette Area Coordinated Transportation	4.56	14	5.32	-3.01%	10
Town of Cary	5.62	12	9.22	-9.43%	15
City of Wichita Falls	11.50	5	12.89	-2.26%	7
City of Jackson Transportation Authority	18.68	1	17.70	1.08%	3
Lake County Board of County Commissioners	10.34	8	13.73	-5.50%	14
City of Tyler	6.29	11	8.10	-4.92%	13
City of Ocala	11.79	4	14.04	-3.42%	11
Lebanon Transit	10.45	7	10.06	0.76%	4
Freedom Transit	5.04	13	3.93	5.11%	2
Crawford Area Transportation Authority	9.96	9	11.25	-2.42%	8
Schuylkill Transportation System	10.57	6	11.77	-2.12%	6
Monroe County Transportation Authority	7.66	10	8.06	-1.03%	5
Average	9.44		10.58	-1.73%	
Standard Deviation	3.90		4.34	4.31%	
Average – 1 Standard Deviation	5.54		6.24	-6.03%	
Average + 1 Standard Deviation	13.34		14.92	2.58%	
Act 44 Compliance Determination	In Compliance		In Compliance		
Compared to the Peer Group Average	Weaker		Stronger		

Operating Revenue per Revenue Vehicle-Hour: MB

System	FYE 2019 Single-Year		Five-Year Change Since FYE 2014		
	Value	Rank of 15	2014 Value	Annual Rate	Rank of 15
Martin County Public Transit	\$4.37	13	\$3.09	7.18%	3
City of Nashua	\$24.97	2	\$21.55	2.99%	5
Michiana Area Council of Governments	\$8.40	10	\$8.96	-1.29%	8
Fayette Area Coordinated Transportation	\$6.44	11	\$7.92	-4.08%	11
Town of Cary	\$4.08	15	\$27.37	-31.67%	15
City of Wichita Falls	\$11.18	5	\$7.84	7.35%	2
City of Jackson Transportation Authority	\$25.91	1	\$19.21	6.16%	4
Lake County Board of County Commissioners	\$4.81	12	\$9.63	-12.97%	14
City of Tyler	\$4.17	14	\$5.58	-5.66%	13
City of Ocala	\$9.43	9	\$12.51	-5.50%	12
Lebanon Transit	\$14.46	4	\$17.76	-4.03%	10
Freedom Transit	\$10.49	6	\$10.85	-0.67%	7
Crawford Area Transportation Authority	\$15.01	3	\$8.71	11.51%	1
Schuylkill Transportation System	\$10.33	8	\$12.03	-2.99%	9
Monroe County Transportation Authority	\$10.37	7	\$9.22	2.38%	6
Average	\$10.96		\$12.15	-2.09%	
Standard Deviation	\$6.83		\$6.56	10.36%	
Average – 1 Standard Deviation	\$4.13		\$5.59	-12.45%	
Average + 1 Standard Deviation	\$17.79		\$18.71	8.27%	
Act 44 Compliance Determination	In Compliance		In Compliance		
Compared to the Peer Group Average	Weaker		Stronger		

Operating Cost per Revenue Vehicle-Hour: MB

System	FYE 2019 Single-Year		Five-Year Change Since FYE 2014		
	Value	Rank of 15	2014 Value	Annual Rate	Rank of 15
Martin County Public Transit	\$65.28	5	\$63.84	0.45%	4
City of Nashua	\$62.65	3	\$58.30	1.45%	8
Michiana Area Council of Governments	\$61.93	1	\$54.57	2.56%	11
Fayette Area Coordinated Transportation	\$65.73	6	\$65.93	-0.06%	3
Town of Cary	\$76.25	9	\$47.17	10.08%	15
City of Wichita Falls	\$62.33	2	\$51.52	3.88%	14
City of Jackson Transportation Authority	\$104.58	14	\$86.96	3.76%	13
Lake County Board of County Commissioners	\$98.20	11	\$91.17	1.49%	9
City of Tyler	\$67.50	7	\$59.91	2.42%	10
City of Ocala	\$73.18	8	\$77.88	-1.24%	1
Lebanon Transit	\$98.36	12	\$85.71	2.79%	12
Freedom Transit	\$77.29	10	\$78.64	-0.34%	2
Crawford Area Transportation Authority	\$64.41	4	\$60.88	1.13%	6
Schuylkill Transportation System	\$115.71	15	\$107.70	1.44%	7
Monroe County Transportation Authority	\$103.16	13	\$99.56	0.71%	5
Average	\$79.77		\$72.65	2.04%	
Standard Deviation	\$18.73		\$18.49	2.66%	
Average – 1 Standard Deviation	\$61.04		\$54.16	-0.62%	
Average + 1 Standard Deviation	\$98.50		\$91.14	4.69%	
Act 44 Compliance Determination	At Risk		In Compliance		
Compared to the Peer Group Average	Weaker		Stronger		

Operating Cost per Passenger: MB

System	FYE 2019 Single-Year		Five-Year Change Since FYE 2014		
	Value	Rank of 15	2014 Value	Annual Rate	Rank of 15
Martin County Public Transit	\$15.11	14	\$22.05	-7.28%	1
City of Nashua	\$4.99	1	\$3.72	6.01%	11
Michiana Area Council of Governments	\$5.06	2	\$3.87	5.51%	10
Fayette Area Coordinated Transportation	\$14.40	13	\$12.40	3.05%	7
Town of Cary	\$13.57	12	\$5.11	21.55%	15
City of Wichita Falls	\$5.42	3	\$4.00	6.28%	12
City of Jackson Transportation Authority	\$5.60	4	\$4.91	2.65%	6
Lake County Board of County Commissioners	\$9.49	8	\$6.64	7.40%	13
City of Tyler	\$10.72	9	\$7.40	7.71%	14
City of Ocala	\$6.20	5	\$5.55	2.26%	5
Lebanon Transit	\$9.42	7	\$8.52	2.01%	4
Freedom Transit	\$15.33	15	\$20.02	-5.19%	2
Crawford Area Transportation Authority	\$6.47	6	\$5.41	3.64%	8
Schuylkill Transportation System	\$10.95	10	\$9.15	3.65%	9
Monroe County Transportation Authority	\$13.47	11	\$12.35	1.76%	3
Average	\$9.75		\$8.74	4.07%	
Standard Deviation	\$3.93		\$5.72	6.39%	
Average – 1 Standard Deviation	\$5.81		\$3.02	-2.32%	
Average + 1 Standard Deviation	\$13.68		\$14.46	10.46%	
Act 44 Compliance Determination	In Compliance		In Compliance		
Compared to the Peer Group Average	Weaker		Stronger		

