

GREATER CLEVELAND
REGIONAL TRANSIT
AUTHORITY

INTERNAL AUDIT
QUARTERLY REPORT
Second Quarter - 2025

August, 2025

**GREATER CLEVELAND REGIONAL TRANSIT AUTHORITY
INTERNAL AUDIT DEPARTMENT QUARTERLY REPORT
APRIL 1, 2025 THROUGH JUNE 30, 2025**

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INTRODUCTION

Presented herein and in accordance with Board Policy is the report on the Internal Audit Department activities for the Second Quarter 2025. The report outlines work performed, recommendations and management's responses, including specific steps for the implementation of all agreed-upon recommendations and other pertinent data.

The purpose of the Greater Cleveland Regional Transit Authority's Internal Audit Department is to provide independent, objective assurance and advisory services designed to add value and improve GCRTA's operations. The mission of internal audit is to enhance and protect organizational value by providing risk-based and objective assurance, advice, and insight. The Internal Audit Department helps GCRTA accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of governance, risk management, and control processes.

We will respond to requests for assurance and advisory services in a timely manner. Please contact me on (216) 356-3106 to service your requests.

The Internal Audit Department functions as the inspector general for the GCRTA. The mission of the inspector general is to detect and deter waste, fraud, abuse, and misconduct in GCRTA programs and personnel, and to promote economy and efficiency in those programs. These responsibilities include initiating and conducting inspections and investigations of GCRTA operations and activities. Also, forward to the appropriate authorities any evidence of criminal wrongdoing that is discovered because of any inspection or investigation.

The Greater Cleveland Regional Transit Authority does not tolerate fraud, waste, abuse, theft, or ethical violations. If you are aware of any such activity occurring against or within the GCRTA, please contact the GCRTA Fraud/Waste/Abuse/Ethics Hotline at (216) 350-5130 or <http://www.riderta.com/fraudhotline>

"The GCRTA Internal Audit Department conforms with the International Standards for the Professional Practice of Internal Auditing."

 8/12/2025

Anthony A. Garofoli
Executive Director of Internal Audit

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2025 INTERNAL AUDIT PLAN

Project

	Budgeted Hours	Audit Theme
<u>Advisory Projects</u>		
Change Order Committee	40	Financial Health
Customer Information	80	Customer Experience
Data Analytics	40	Financial Health
Fraud Risk Assessment	80	Financial Health
FTA Pre-Triennial	100	Financial Health
Global Internal Audit Standards Implementation	80	Employee Investment
Insurance Application Support	40	Financial Health
Real Property Identification	40	Financial Health
<u>Internal Audits</u>		
Accident Review Committee Rating and Prioritization	80	Employee Investment
Accounts Payable	150	Financial Health
ADA Certification Process	160	Customer Experience
ADA Stop Announcements	150	Customer Experience
Bus Field Supervision Follow-up	40	Employee Investment
Capital Planning Funding Process Development	100	Financial Health
CSU U-Pass Closeout	40	Financial Health
Customer Communication - Service Interruptions Follow-Up	80	Customer Experience
Customer Complaints	150	Customer Experience
Electronic Funds Transfer Follow-up	40	Financial Health
Exit Interview Process	150	Employee Investment
Fare Capping	200	Customer Experience
Fare Collection	250	Financial Health
Federal Grant Funding Compliance Review	40	Financial Health
Fuel Expense - CNG and Propulsion	60	Financial Health
GCRTA Board Stipends and General Manager Salary	40	Financial Health
Healthcare Claims Expense	40	Financial Health
In-Service Vehicle Failures	100	Customer Experience
Miscellaneous Receipts Process	200	Financial Health
Nepotism Self-Disclosure File Audit	20	Employee Investment
On-Time Performance	150	Customer Experience
Operator Training Program	200	Employee Investment
Physical Inventory	200	Configuration Management
Power & Way - Asset & Configuration Management	250	Configuration Management
Predictive Maintenance Program	250	Configuration Management
PTASP - AP 016 Safety Review Policy and Procedures	80	Configuration Management
Purchasing Card Process	150	Financial Health
Student Operator Overtime	100	Employee Investment
Succession Planning	200	Employee Investment
Third-Party Risk Assessment	100	Financial Health
Transit Ambassadors	40	Customer Experience
Travel Reimbursement	150	Financial Health
Work Order Management	200	Configuration Management
Workers' Compensation and Claims Process	40	Financial Health

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2025 INTERNAL AUDIT PLAN

Project

	Budgeted Hours	Audit Theme
<u>Railcar Replacement</u>		
Brookpark Maintenance Shop & Yard Construction	100	Community Impact
Buy America - Locomotive Replacement	60	Community Impact
Buy America - Owner Furnished Equipment	40	Community Impact
Buy America - Railcar Option	40	Community Impact
Railcar Infrastructure Modifications	80	Community Impact
Railcar Port Connection Construction	80	Community Impact
Railcar Replacement Contract – Siemens	150	Community Impact
<u>Information Technology Audits</u>		
Accrued Leave	200	IT Governance
Applicant Tracking System Implementation	100	Employee Investment
Artificial Intelligence Policy	40	IT Governance
Change and Patch Management	200	IT Governance
CISA External Dependencies Management Assessment	40	IT Governance
Consolidated Train Dispatch System Replacement	100	Community Impact
Cybersecurity	40	IT Governance
Disaster Recovery	120	IT Governance
Hastus Operator Performance Module	80	Employee Investment
IT Equipment Inventory	80	IT Governance
IT Governance	80	IT Governance
Maintenance Management System Upgrade	100	Configuration Management
Pass Upgrade/Mobility App	120	Community Impact
Role-Based Access Control	200	IT Governance
Salary Non-Exempt Compensatory Time	20	Financial Health
Third-Party System and Organization Controls (SOC)	80	IT Governance
Windows 11 Upgrade	40	IT Governance
<u>Continuous Audit</u>		
Continuous Audit Dashboard Development	250	Financial Health
Dependent Benefit Eligibility Script Development	100	Financial Health
Fuel Expense Script Development	130	Financial Health
Mobile Ticketing Script Development	500	Financial Health
Nepotism Script	50	Employee Investment
Paratransit Script	20	Financial Health
Payroll Script	50	Financial Health
Purchasing Script	50	Financial Health
Revenue Script	50	Financial Health
<u>External Audits</u>		
Financial Audit Support	40	Financial Health
FTA Project Management Oversight	40	Community Impact
System Security Plan	40	Financial Health

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2025 INTERNAL AUDIT PLAN

Project	Budgeted Hours	Audit Theme
<u>Contract Audits</u>		
12D Trunk Line Signal System Construction	100	Community Impact
52N East Portal Construction	100	Community Impact
60E E.120th Substation Construction	100	Community Impact
Buy America - Articulated Coach Replacement	40	Community Impact
Buy America - CNG Coach Replacement	80	Community Impact
Buy America - Paratransit Vehicle Replacement	40	Community Impact
Common Area Maintenance Expense Review	150	Financial Health
Landscaping Contracts	100	Community Impact
Special Requests & Emerging Issues	2000	

Success Outcomes and Audit Themes:

GCRTA management developed four success outcomes with performance metrics to achieve the long term strategic vision and action plan to guide everyday decision-making.

- I. ***Customer Experience***
- II. ***Community Impact***
- III. ***Financial Health***
- IV. ***Employee Investment***

In addition to these four success outcomes, the Internal Audit Department identified two additional agency priorities and high-risk areas to guide our audit plan development.

- V. ***IT Governance***
- VI. ***Configuration Management***

These six topics represent the six audit themes we prioritized for our 2025 annual audit plan. Our plan is designed to support management to achieve the business objectives through risk-based assurance audits and advisory engagements.

“The chief audit executive must create an internal audit plan that supports the achievement of the organization’s objectives” – Global Internal Audit Standards – Section 9.4 Internal Audit Plan

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COMPLETED PROJECTS

GCRTA Travel Expense & Reimbursements

Purpose:

Per Chapter 656.03 of the Codified Rules and Regulations of the GCRTA - Travel Policies and Procedures: "Travel expenses will be subject to a final compliance review by the Internal Audit Department."

Scope:

Internal Audit reviewed all the Board of Trustee and employee Travel Reports and Reimbursement Requests for the period April 1, 2025 through June 30, 2025 prior to cash disbursement. The review included tests for allowability, reasonableness, and timeliness.

Audit Theme: Employee Investment

Results:

Internal Audit reviewed all the Travel Reports and Reimbursement Requests during the period. Any exceptions to the Codified Rules and Regulations and Administrative Procedure 024 - Travel Policy were returned to management for correction prior to final approval and cash disbursement.

Issues for Board Consideration: None

On-Time Performance

Purpose:

To evaluate the processes for defining, measuring, and improving on-time performance.

Scope:

Bus and Rail On-Time Performance in 2024 and 2025.

Audit Theme: Customer Experience

Results: Marginally Unsatisfactory with recommendations for management.

Management Successful Practices:

- Continuous monitoring and adjusting of timetables, based on Operator and customer feedback.

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COMPLETED PROJECTS

- Utilization of new Operations Analysis team to enhance On-Time Performance analytical techniques.

Recommendations:

- Adjustments to parameters for measuring “early” vehicles due to technological improvements to measurement margin of error.
- Improvements to increase the accurate recording and reporting of real-time information for customers on rail and bus.
- Enhancements to internal and external reporting of detailed On-Time Performance metrics, including enhanced reporting for board governance.
- Implement strategies to identify and address poor performing route segments to improve customer perception of on-time performance.

Issues for Board Consideration: None

Fuel Expense – CNG and Propulsion

Purpose:

Evaluation of contract compliance and to obtain background information, including expenditure trends, documentation of the workflow processes, invoice payments, and access controls.

Scope:

Compressed natural gas and propulsion power overseen by the Energy Manager.

Audit Theme: Financial Health

Results:

Satisfactory with recommendations for management.

Management Successful Practices:

- Robust control environment for ensuring GCRTA is correctly invoiced for natural gas and electricity usage for fuel.

Recommendations:

- Implement independent verification that Trillium performs maintenance on CNG stations required by the contract schedule prior to invoice payment.

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COMPLETED PROJECTS

Issues for Board Consideration: None

Vehicle Replacement Audits

As a condition of receiving Federal Transit Administration (FTA) funding for the procurement of rolling stock (such as buses or rail vehicles), grant recipients are required to ensure compliance with the Buy America provisions set forth in 49 U.S.C. § 5323(j) and 49 CFR Part 661 and 663.

Pre-Award Audit:

A Pre-Award Buy America Audit must occur before a contract is executed with the selected vehicle manufacturer. The primary objective of the Pre-Award Buy America Audit is to verify the proposed vehicle complies with federal domestic content and final assembly requirements. Specifically, for contracts signed after October 1, 2019, the rolling stock must have a minimum of 70% domestic content, and the final assembly of the vehicle must take place in the United States.

Post-Delivery Audit:

A Post-Delivery audit must be completed prior to final acceptance and payment and is an essential compliance checkpoint to ensure the vehicles delivered meet all federal Buy America requirements.

The purpose of the Post-Delivery Audit is to verify the manufacturer fulfilled its contractual and legal obligations related to domestic content and final assembly.

Manufacturer	Vehicle Type	Location	Type	Audit Status
Geismar	(1) Line Car	Beaufort, SC	Pre-Award	Complete
Geismar	(1) Locomotive	Beaufort, SC	Post-Delivery	In-progress
Gillig	(40) CNG Coaches	Livermore, CA	Pre-Award	Complete
New Flyer	(6) Articulated BRT	St Cloud, MN	Pre-Award	Complete
Siemens	(18) High-floor LRV	Sacramento, CA	Pre-Award	Complete
Endera	(17) Paratransit Coaches	Lima, OH	Pre-Award	Complete
Siemens	(12) High-floor LRV	Sacramento, CA	Pre-Award	To be scheduled

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CONTINUOUS AUDIT PROJECTS

Continuous auditing is an automatic method used to perform auditing activities, such as control and risk assessments, on a more frequent basis. Technology plays a key role in continuous audit activities by helping to automate the identification of exceptions or anomalies, analyze patterns within the digits of key numeric fields, review trends, and test controls, among other activities.

Customer Fare Collections

Purpose:

To evaluate and provide assurance customer fares, collected from fare collections systems are reconciled, posted to accounting records, and deposited in the bank.

Scope:

Internal Audit Staff developed a continuous audit test, utilizing audit software, to query the fare collections systems data to reconcile with cash counts, GCRTA accounting records and third-party bank deposits. The audit script is executed daily. Any exceptions are noted for investigation with appropriate management.

Results:

We executed the audit script monthly during the Second Quarter 2025. The on-board revenue collections system is working effectively. The system captured the transactions, cash was collected, reconciled, and deposited, and revenue receipts were posted to the general ledger.

The “Proof of Payment” system fare collection receipts represent approximately 11% of the total revenue receipts. Fares paid with credit cards were collected, reconciled, and deposited without exception. Cash collections included some immaterial differences between machine totals and amounts deposited, due to known system errors.

Issues for Board Consideration: None

Procurement Card (P-Cards)

Purpose:

The GCRTA launched a P-Card Program many years ago. P-Cards provide a means for streamlining the procure-to-pay process, allowing cardholders to procure goods and services in a timely manner, reduce transaction costs, track expenses, take advantage of supplier discounts, reduce, or redirect staff in the purchasing and/or accounts payable departments, reduce or eliminate petty cash, and more.

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CONTINUOUS AUDIT PROJECTS

Scope:

Internal Audit developed a continuous auditing script to evaluate P-Card transactions for compliance with the GCRTA Procurement Card Policy. We also evaluate transactions for potential fraud, waste, and abuse.

Results:

Internal Audit executed the script monthly during the Second Quarter 2025. All results were shared with management.

We will continue to provide the PCard administrator with monthly audit reports designed to target risk areas and anomalies. This will enable the administrator to evaluate compliance with the PCard Policies and Procedures. We will provide additional audit or investigative services as needed.

Issues for Board Consideration: None

Payroll

Purpose:

Payroll (Labor) is typically the highest line-item expense on the operating financial statement. Internal Audit will execute a computerized audit script, combining human resources and payroll transaction data, to detect scenarios that may indicate fraud, waste, and abuse.

Scope:

Internal Audit developed a continuous auditing script to evaluate each of the bi-weekly payrolls (bargaining and non-bargaining payroll runs). The script is designed to identify terminated employees, excessive overtime, unusual changes in salary/rates, excessive work hours, unusual deductions, lump sum payouts, and other anomalies.

Results:

Internal Audit executed the script monthly during the Second Quarter 2025. All results were shared with management.

We will continue to provide management with monthly audit reports designed to target risk areas and anomalies. This will enable management to evaluate payroll expenses. We will provide additional audit or investigative services as needed.

Issues for Board Consideration: None

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CONTINUOUS AUDIT PROJECTS

Nepotism

Purpose:

The GCRTA Code of Ethics provides a policy to ensure the hiring and supervision, by and within the Authority, is conducted in compliance with the Ohio laws, and in a manner that enhances public confidence in the Authority, prevents situations that give the appearance of partiality, preferential treatment, improper influence, and conflict of interest.

Scope:

Internal Audit evaluated the relationships and employment placement for all the active employees. GCRTA Personnel Policy 300.03 Employment of Relatives provides:

“...For purposes of this policy, “immediate family” shall mean spouse, children, parents, grandparents, brothers, sisters, grandchildren, or any person related by blood or marriage, or relative residing in the same household...”

Results:

Internal Audit executed the script monthly during the Second Quarter 2025. All results were shared with management.

Issues for Board Consideration: None

Paratransit Certification System Database

Purpose

GCRTA management certifies eligible applicants who schedule and ride Paratransit services. Management utilizes a computerized system to store inactive and active customer information.

Scope:

Internal Audit developed a continuous auditing script to evaluate both inactive and active customer information with the death records posted to the State of Ohio – Department of Health - Vital Statistics Database. We will provide management with data matches to update the Certification System database and search for fraud, waste, and abuse.

Results:

Internal Audit executed the script during the First Quarter 2025. All results were shared with management. This script is executed on an annual basis.

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CONTINUOUS AUDIT PROJECTS

The script identified data matches between the Paratransit System customer database and death records posted to the State of Ohio – Department Health – vital statistics database. Management will deactivate these customer accounts.

Issues for Board Consideration: None

Audit Scripts in Development:

Title	Objective	Status
Compensatory Time – Salaried Non-Exempt	Reconcile employee compensatory hours and earnings across timekeeping and payroll systems	2025 Rerun
Mobile Ticketing Reconciliation	Reconcile mobile fares collected to mobile fare contract	In Development - Monthly
Fuel Expense	Reconcile Diesel and Gasoline deliveries and expenses	Script Finalization
Dependent Eligibility	Validation of all dependents covered by a GCRTA health benefits plan	2025 Development
Dashboards	Development of dashboard for continuous audits for ease of sharing results	In Development

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RAILCAR REPLACEMENT PROGRAM

Railcar Replacement Contract

Purpose:

In April 2023, the Board of Trustees authorized Contract No. 2021-125 with Siemens Mobility, Inc. for the design, manufacture, and delivery of up to twenty-four **(24)** high floor light rail vehicles, spare parts, tooling, and training in an amount not to exceed \$163,920,115.00.

The base contract Notice to Proceed was issued on June 26, 2023. The contract includes options to purchase 36 additional railcars.

In November 2023, the Board of Trustees authorized the exercise of an option under Contract No. 2021-125 with Siemens Mobility, Inc. for the purchase and delivery of up to six **(6)** High Floor Light Rail Vehicles at a unit price of \$5,166,336.00, for an amount not to exceed \$30,998,016.00.

In November 2024, the Board of Trustees authorized the exercise of an option under Contract No. 2021-125 with Siemens Mobility, Inc. for the purchase and delivery of up to eighteen **(18)** High Floor Light Rail Vehicles at the contractual base price of \$5,166,336.00 plus an inflationary price increase calculated at the time of final assembly based on the producer price index for transportation equipment and a labor index published monthly by the United States Department of Labor Bureau of Labor Statistics

Internal Audit will provide ongoing contract compliance assurance on program management and procurement activities and will complete the required Buy America audits.

Scope:

Internal Audit will evaluate contract compliance and management controls.

Per request from the GCRTA Audit Committee, Internal Audit will provide an update on change orders to the contract on a quarterly basis.

Second Quarter 2025 Update:

First painted car shell is complete. Assembly underway. Management is preparing final option for up to 12 additional railcars. The Buy America Audit will follow.

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RAILCAR REPLACEMENT PROGRAM



Change Orders:

No change orders during the Second Quarter 2025.

(See Change Order Chart on Next Page)

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RAILCAR REPLACEMENT PROGRAM

CHANGE ORDER No. 5 LOG

CONTRACT NO. 2021-125

**TECHNICAL SPECIFICATION, PROGRA MANAGEMENT AND ENGINEERING SERVICES FOR
RED LINE HRV REPLACEMENT**

Contract #2021-125

Contractor: Siemens Mobility Inc.

Original Contract Amount \$163,920,115.00

Total G.M./C.E.O. Authority Remaining \$ 5,828,281.79

Total Change Order Amount To Date \$144,469,735.00

ITEM NO.	NOTE No.	APPROVAL DATE	CHANGE ORDER AMOUNT	APPROVAL AUTHORITY	NEW CONTRACT AMOUNT
1	1	11-28-23	\$30,998,016	BOT	\$194,918,131.00
2	2	12-5-23	\$510,888	\$5,989,112.00	\$195,429,019.00
3	3	12-6-23	\$0.00	\$5,989,112.00	\$195,429,019.00
4	4	3-29-24	\$108,916.54	\$5,880,195.46	\$195,537,935.54
5	5	8-6-24	\$51,913.67	\$5,828,281.89	\$195,589,849.21
6	6	12-16-24	\$112,800,000.79	BOT	\$308,389,850.00

NOTES/CHANGE ORDER DESCRIPTION:

CO No. 1 – Exercise 6 Vehicle Options
CO No. 2 – 4 Additional Couplers
CO No. 3 – Modification of SP-20B
CO No. 4 – Smoke Detectors
CO No. 5 – Additional Wheel Profiles
CO No. 6 – 18 Option Vehicle, Spare Parts and Tools

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RAILCAR REPLACEMENT PROGRAM

GCRTA Financial Management System

RTA Set of Books:

Purchase Order – Railcar Replacement

- Purchase Order Line Items – totaling **\$308,389,849.21**. (per board approval)
- **\$115,921,197.95** paid (as of 8/1/2025)
- **37% of contract amount plus change orders is paid.**

OTHER RAILCAR REPLACEMENT PROGRAM CONTRACTS:

Contract	Contract Amt	Expenditures	Change Orders
Hatch Engineering Consulting	\$5,936,923.21	\$3,401,432.86	2
K&J Safety and Security Consulting	\$517,024.02	\$254,947.32	2
Port Connection (Design)	\$78,130.00	\$77,739.78	0
Port Connection (Construction)	\$890,714.37	\$855,376.65	1
Brookpark Yard and Track (Design)	\$80,250.00	\$45,088.36	1
Brookpark Yard and Track (Construction)	\$2,933,715.63	\$845,227.02	1
Brookpark Interior Mods (Design)	\$283,739.00	\$214,865.00	0
Brookpark Interior Mods (Construction)	\$2,995,038.000	\$706,844.40	3
Central Rail Maintenance Mods (Design)	\$590,762.24	\$425,087.67	2
Central Rail Maintenance Mods (Construction)	Pending Design	N/A	N/A

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RAILCAR REPLACEMENT PROGRAM

Electronics Lab	\$27,921.89	\$27,921.89	1
Red Line Platform Mods (Design)	\$861,676.92	\$658,450.00	0
Red Line Platform Mods (Construction)	Pending Design	N/A	N/A
Light Rail Platform Mods (Design)	RFP Advertised	N/A	N/A
Light Rail Platform Mods (Construction)	Pending Design	N/A	N/A

Internal Audit will provide ongoing contract compliance assurance on program management and procurement activities and will complete the required Buy America audits.

Completed Project:

Railcar Infrastructure Modification Designs

Purpose:

GCRTA is procuring new railcars from Siemens to replace its existing fleet. GCRTA must complete a series of modifications to its existing infrastructure to support the delivery, commissioning, and operation of the new railcars. These infrastructure modifications include:

- 66B Port of Cleveland Connector Track
- 66C Brookpark Shop and Yard Tracks
- 66C2 Brookpark Rail Shop Modifications
- 66D CRMF New Railcar Modifications
- 66D2 CRMF Electronics Lab Remodeling
- 66E1 Red Line Station Platform Modifications
- 66E2 Light Rail Station Platform and Mini-High Modifications

Scope:

To evaluate project and contract management controls for railcar infrastructure modification designs.

Audit Theme: Community Impact

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RAILCAR REPLACEMENT PROGRAM

Results:

Satisfactory with recommendations for management.

Management Successful Practices:

- The Railcar Project Team's master infrastructure schedule is well-developed, accurate, and updated proactively. Engineering staff communicate details of projects transparently to internal stakeholders.

Recommendations:

- To implement a similarly formatted or organized master project schedule for the entire GCRTA capital program.

Issues for Board Consideration: None

Projects in Progress:

Port of Cleveland Track Connector

Purpose:

The Board of Trustees authorized Contract No. 2024-002 with Kennedy Railroad Services, LLC for Project No. 66B - Port of Cleveland Connector Track in an amount not to exceed \$883,443.00.

Scope:

Internal Audit will evaluate the project management controls for the track connector project, and contract compliance.

Brookpark Rail Shop Modifications

Purpose:

The Board of Trustees authorized Contract No. 2024-205 with Standard Contracting & Engineering, Inc. for Brookpark Rail Shop modifications in an amount not to exceed \$2,893,100.00

Scope:

Internal Audit will evaluate the project management controls for the Brookpark Rail Shop modifications project, and contract compliance.

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RAILCAR REPLACEMENT PROGRAM

Brookpark Yard Tracks Improvements

The Board of Trustees authorized Contract No. 2024-195 with Railworks Track Services, LLC for Brookpark Yard Tracks improvements in an amount not to exceed \$2,589,826.00.

Scope:

Internal Audit will evaluate the project management controls for the Brookpark Yard Tracks improvement project, and contract compliance.

Federal Transit Administration – Project Management Oversight – Buy America (Content Monitoring)

Purpose:

U.S. DOT Federal Transit Administration Project Management Oversight monitors the management of FTA-supported major capital projects to determine whether the projects:

- are on time,
- within budget,
- in conformance with design and quality criteria,
- in compliance with all applicable Federal requirements, and
- constructed to approved plans and specifications, delivering the identified benefits, and safely, efficiently, and effectively.

The FTA engaged a third-party contractor (LS Gallegos Inc. and Steve Policar, LLC) to conduct a Buy America Review of the GCRTA Internal Audit activities. The contractor utilized Oversight Procedure 36 - Buy America Compliance Review. The instructions in this OP are subordinate to the regulations in 49 CFR 661 - Buy America Requirements and 49 CFR 663 - Pre-Award and Post-Delivery Audits of Rolling Stock Purchases.

Scope:

- Internal Audit will conduct a Pre-Award Buy America Review prior to the NTP for each contract option.
- Internal Audit will conduct an intermediate Buy America Review, when applicable. This is based on manufacturer supplied reporting.
- Internal Audit will conduct a Post-Delivery Buy America Review prior to accepting title to railcars or placing the railcars into revenue service.
- Internal Audit will conduct Post-Delivery Domestic Content Monitoring throughout the duration of the contract.
- Internal Audit will review and evaluate Resident Inspector Reports in accordance with 49 CFR §663.37.(a).

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RAILCAR REPLACEMENT PROGRAM

Federal Transit Administration – Project Management Oversight – Project Management Review

Purpose:

U.S. DOT Federal Transit Administration Project Management Oversight monitors the management of FTA-supported major capital projects to determine whether the projects are:

- on time,
- within budget,
- in conformance with design and quality criteria,
- in compliance with all applicable Federal requirements, and
- constructed to approved plans and specifications, delivering the identified benefits, and safely, efficiently, and effectively.

Scope:

The FTA engaged a third-party contractor (LS Gallegos, Inc.) to conduct a Project Management Review, including:

- Monthly Check-in Meetings
- FTA Project Management Oversight Procedures

The contractor will utilize U.S. DOT Federal Transit Administration TPM-20 Office of Capital Project Management Project Management Oversight Procedure 20 - Project Management Plan Review.

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PROJECTS IN PROGRESS

Projects in Progress – Planning/Risk Assessment

Audit Title	Objective
Applicant Tracking System (ATS) Implementation	To provide assurance on the implementation of the new ATS. Scope to include evaluation of candidate experience and integration of software into existing workflows. <i>*Project delayed from implementation*</i>
Configuration Management Follow-up	Post-audit implementation assurance to support project success. <i>*Management is still working to implement Internal Audit Recommendations.*</i>
CSU U-Pass Program	To evaluate agreement compliance for Cleveland State University Student “Universal Pass” program. <i>*Audit delayed: Plan to reengage in Q3*</i>
Customer Communication - Service Interruptions Follow-Up	To evaluate GCRTA processes for communicating planned and unplanned service interruptions to customers.
IT Equipment Inventory	To evaluate the governance of IT inventory throughout the lifecycle of end user equipment managed by the GCRTA Information Technology Department.
Pass Upgrade/ Mobility App	To evaluate the upgrade of the Trapeze PASS application and the future implementation of the Trapeze Pass mobile application.
Physical Inventory	Evaluation of GCRTA controls to ensure an accurate count of inventory. <i>*Project delayed due to system implementation*</i>
PTASP - AP 016 Safety Review Policy and Procedures	To assess GCRTA compliance with Administrative Procedure 016 – Safety Review Policy and review Safety Department processes for completing and documenting safety reviews.
Purchasing Card Program	To provide assurance on the purchasing card program, including compliance with policies and procedures, controls for detecting and preventing fraud and misuse, and identifying opportunities for process improvement.

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PROJECTS IN PROGRESS

Work Order Management

Evaluate how work orders are scheduled, completed, approved, closed, and quality assured.

 Green = New this quarter


Projects in Progress - Fieldwork

Audit Title	Objective
Accounts Payable	To provide assurance over GCRTA's accounts payable controls, including segregation of duties, payment supporting documentation, timely payments, three-way match, and payment reconciliation.
Change and Patch Management	Perform a review of the IT change management process to provide assurance that the process is controlled, monitored, and is compliant with industry best practices.
Fare Collection	To provide assurance over the fare collection process, including front-line staff training, customer-facing information, equipment and processes for purchasing and validating fares, and controls to mitigate fare evasion.
Fraud Risk Assessment	An entity-wide risk assessment of fraud vulnerabilities and the controls in place to detect, prevent, and mitigate fraud.
Hastus Operator Performance Module	To ensure the proper configuration and implementation of absence tracking and follow-up in the Employee Performance Management module in Hastus.
In-Service Vehicle Failures	To provide assurance over the process to respond to in-service mechanical failures, including passenger communications, Service Quality response, mobile mechanic response, and towing contract response.

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PROJECTS IN PROGRESS

IT Governance	Internal Audit support for IT Council and implementation of IT Governance.
Paratransit Certification	To provide assurance on the certification process including compliance with regulations and evaluation of GCRTA process efficacy.
Railcar Replacement Contract (Siemens)	To provide ongoing contract compliance assurance on program management and procurement activities and to complete necessary Buy America reviews.
Real Property Identification	Analytical support for reconciling property records between GCRTA and Cuyahoga County record.
Windows 11 Upgrade	To provide assurance over the Windows 11 upgrade, ensuring that all eligible systems receive an upgrade, and that all platforms requiring legacy operating system support are identified with mitigating controls in place to reduce security risk.

 Green = New this quarter

Projects in Progress - Reporting

Audit Title	Objective
Accrued Leave	To provide assurance over the controls in place to calculate, track, and roll-forward accrued leave balances.
Board Stipends and General Manager Salary	To provide assurance that compensation and benefits are paid in compliance with applicable laws, policies, and employment agreements.
Customer Complaints	To provide assurance over the customer complaints process, including sources of complaints, assigning responsible parties, complaint resolution, tracking/reporting, and follow-up.
Maintenance/Mgt System Upgrade	To provide assurance over the Maintenance/Management System upgrade, evaluating IT Project Management system implementation.

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PROJECTS IN PROGRESS

Projects in Progress – Construction

Project Name	Audit Phase	Construction Budget w/ CO	Construction Target Completion Date
59 Fiber Optic Line Replacement	Reporting	\$6,224,623.00	June 2025
66B Port Connector Track	Fieldwork	\$890,714.37	August 2025
52N East Portal	Risk Assessment	\$18,038,105.47	October 2026
12D Trunk Line Signal	Risk Assessment	\$5,593,857.76	January 2027

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SPECIAL REQUESTS AND EMERGING ISSUES

Diverted Vendor Payment

Purpose:

The GCRTA was subject to a spear phishing cybercrime where a vendor payment was diverted to a cybercriminal.

Scope:

GCRTA continues to support law enforcement agencies and GCRTA Risk Management to investigate the crime and file insurance claims.

Update:

Field work is complete. Internal Audit will release the final report after sharing the results with management for management response.

Student Operator Overtime

Purpose:

Internal Audit received a tip concerning the processing of overtime compensation for student operators.

Scope:

Internal Audit will review the workflow, records, and earnings paid to student operators.

Update:

Field work is complete. Internal Audit will release the final report after sharing the results with management for management response.

West 117th Rapid Station Change Directive

Purpose:

Internal Audit received a request from a Procurement Contract Program Manager to audit the contractor's home office expenses related to contract change directive.

Scope:

Internal Audit will include the costs and supporting documentation for the change directive invoices.

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SPECIAL REQUESTS AND EMERGING ISSUES

Update:

Field work is complete. Internal Audit will release the final report after sharing the results with management for management response.

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EXTERNAL AUDIT COORDINATION

IIA Global Audit Standards

Standard 9.5 Coordination and Reliance – The chief audit executive must coordinate with internal and external providers of assurance services and consider reliance on their work.

The following Federal and State Agencies performed audits and reviews of the Authority's policies and records during the Second Quarter 2025:

State of Ohio – Office of the Auditor .

- The State Auditor conducted the Financial and Single Audit of the period ending December 31, 2024. Internal Audit provided dedicated support to the State Auditor. The State Auditor released the final audit report on July 9, 2025.

State of Ohio – Ohio Department of Transportation (ODOT)

- Federal legislation requires each state to have and implement a State Safety and Security Oversight program for its rail transit systems. The ODOT Rail Transit Safety and Security Oversight Program fulfills this requirement.
- ODOT selected a consultant, Vital Assurance Inc., to act as the Program Manager for Rail Safety and Security Audits.
- Internal Audit will work with GCRTA Safety to perform the audits as required by ODOT.
- The Consultant meets with GCRTA Management on a quarterly basis to review and follow-up on outstanding corrective action.

Federal Transit Administration - Project Management Oversight – Railcar Replacement Program:

- The FTA contracted with LS Gallegos to provide project management oversight for the railcar replacement program.
- The consultant utilizes FTA developed oversight procedures to monitor and evaluate the compliance with grant requirements.
- Internal Audit will work with contractors to perform the audits as required.
- The consultant meets with GCRTA Management monthly to review a prescribed agenda and follow-up on outstanding corrective actions.

Internal Audit will coordinate the final audit and review findings within our audit management system. We track recommendations and corrective actions through implementation. Audit staff will review supporting evidence to close outstanding issues.

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STATUS OF OUTSTANDING FOLLOW-UP
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IIA Global Audit Standards

Standard 15.2 Confirming the Implementation of Recommendations or Action Plans – Internal auditors must confirm that management has implemented internal auditors' recommendations or management's action plans.

All outstanding issues and recommendations from internal and external audits and reviews are tracked within the Internal Audit Management System *Issue Tracking Module*.

Internal Audit and management agree on audit findings, issues, recommendations, corrective actions, and implementation dates.

Audit staff are directed to follow-up with management to evaluate corrective actions are effectively implemented. Upon verification, issues are closed.

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OTHER PROJECTS

Fraud Hotline

The GCRTA Fraud Hotline (216) 350-5130 is established to reduce and recover the loss of public funds from any acts of fraud, waste and/or abuse. GCRTA contracts include contact information and require contractors to call whenever they suspect an illegal act or an ethics violation. The Hotline is available to our employees and the public. Audit Staff will work closely with Management, Transit Police as well as law enforcement agencies, prosecutors, professional associations, and the public to ensure GCRTA assets are safeguarded.

Change Order Review Committee

The General Manager/CEO created this committee to review potential contract change orders greater than (50) thousand dollars to validate the appropriateness of the request and to ensure appropriate Procurement and Project Management processes are adhered to. Internal Audit serves as a resource to the committee.

Second Quarter 2025 Change Orders:

Internal Audit is a member of the Change Order Committee, established to review potential change orders, greater than \$50,000, for compliance with Federal and State laws and regulations.

- Contract 2024-065 Design Services for CRMF Modifications for New Railcars
- Contract 2022-122 Trunk Line Signal System - design changes
- Contract 2023-100 with Schindler Elevator Corporation for Elevator & Escalator Maintenance & Repair
- Contract 2024-124 Project 19.58 Central Rail Maintenance Facility Repave
- Contract 2023-155 Project 52N Tower City East Portals Rehabilitation

Railcar Replacement Steering Committee

The Deputy General Manager of Operations chairs this committee. The purpose of this committee is to provide advice; ensure delivery of the project outputs, and the achievement of project outcomes.

Executive Records Management Commission

The Deputy General Manager of Finance chairs this commission. The purpose of the commission is to define and establish GCRTA business records for retention, review applications for one-time disposal of obsolete records, review records retention schedules, and schedules for the disposal of records. Internal Audit is a standing member of this council.

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OTHER PROJECTS

Information Technology Council

The Deputy General Managers of Finance and Operations chair this council. The purpose of this council is to develop and enforce GCRTA's IT priorities. They identify which IT projects and initiatives are the most important for the GCRTA's success and provide support to ensure the IT teams achieve their business objectives. Internal Audit is a standing member of this council.

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STAFF TRAINING

Internal Audit Department staff received the following training during the Second Quarter 2025:

- Looking ahead: Unlocking the power of risk-based audits with multi-year planning – Wolters Kluwer
- Business fraud prevention: Five proven actions for auditors & managers – Wolters Kluwer
- Labor Relations Training – GCRTA
- Ohio Ethics Training – State of Ohio

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STAFF PROFILES

Anthony A. Garofoli Executive Director of Internal Audit	Anthony joined the GCRTA on September 23, 1996. He earned his BA in Accounting from Cleveland State University. Prior to joining the GCRTA, he worked 16 years in progressively responsible positions for the Office of the Auditor of the State of Ohio. His experience includes financial audits of State and Local Governmental Units; fraud investigations; contract compliance, operational and internal audits. He has earned several certifications.
Steven Zimmerman Manager of Internal Audit	Steven joined the GCRTA on June 1, 2015. He earned a BS in Biology from Cleveland State University and his Master's Degree in City and Regional Planning from Rutgers University. He is a graduate of the GCRTA Management Development Program. Steven is a Certified Internal Auditor and a Certified Fraud Examiner.
Andrew Scott Information Technology Auditor	Andrew joined the GCRTA on June 5, 2016 and filled multiple roles within the information technology division. He joined IA on September 6, 2020. He earned his BS in Computer Science from the University of Akron. He is a graduate of the GCRTA Management Development Program. Andrew is a Certified Information Systems Auditor.
Molly O'Donnell Lead Auditor	Molly joined the GCRTA on February 23, 2020. She earned a BA in Public Administration, Urban Planning, Sustainability from Miami University, Oxford Ohio. Molly is a Certified Internal Auditor.
Laura Crawshaw Staff Auditor II	Laura joined the GCRTA on September 20, 2021. She earned a BS in Public Policy Analysis from The Ohio State University. Laura participated in the GCRTA Public Transit Development Program. Laura is a Certified Internal Auditor.
Randall Bowles Information Technology Specialist Auditor	Randall joined the GCRTA on February 24, 2020 as the Hayden District Business Analyst. He joined IA on January 24, 2022. He earned his BSBA in Information Systems from the Ohio State University and his MBA from Case Western Reserve University.
Darren Garlock Staff Auditor	Darren joined the GCRTA on February 14, 2014 as an electronic equipment maintainer. He earned his BA in Business Administration from Hiram College and was promoted to a computer system specialist in the Intelligent Transportation Systems unit. He joined IA on April 3, 2022. Darren is a Certified Internal Auditor.
Kylie Cianciolo Staff Auditor	Kylie joined the GCRTA on August 12, 2024. She earned her BA in Philosophy and Sustainability (Focus: Ethics and Policy) from Baldwin Wallace University.