



Specialized Transit for Arlington Residents (STAR)



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EXECUTIVE SUMMARY

Why We Did This Audit

To evaluate STAR's efficiency, effectiveness and compliance with applicable regulations.

As part of the FY 2025 Annual Audit Work Plan, we conducted a performance audit of the Specialized Transit for Arlington Residents (STAR). The objective was to evaluate STAR's efficiency, effectiveness, and compliance with applicable regulations. The audit scope was concentrated in the following areas:

- Accuracy and completeness of billing and operational data
- Adherence to customer service standards and overall program accessibility
- Adequacy of system applications to support program operations
- Oversight by the Transit Bureau of contractors Transdev and WeDriveU
- Operational effectiveness in areas of safety and driver training

Calendar year 2024 program operational data and budget.

In Calendar Year (CY) 2024, STAR completed over 44,200 trips transporting 51,920 passengers. For Fiscal Year (FY) 2025 the program's expense budget is nearly \$3.74 million with projected revenues of \$1.17 million.

STAR program is a paratransit program operating as a component of ART.

STAR is a component of Arlington Transit (ART) and provides shared-ride paratransit services for residents with disabilities. Operated under the Americans with Disabilities Act (ADA) guidelines, STAR offers transportation services comparable to fixed-route transit but is not designed for emergency or medical transport. The program is administered by Arlington's Department of Environmental Services and aligns with the Arlington Transit Strategic Plan FY 2025–2034, which prioritizes equity, accessibility, and high-quality service.

STAR is supported by two contractors: WeDriveU and Transdev.

STAR is supported by two contractors: Transdev, which manages the Transdev Call Center and rider scheduling, and WeDriveU, which became the sole transportation provider in December 2024 following the issuing of a new contract for STAR operations.

What We Found

The audit of the STAR program reveals that while the program succeeds in delivering basic transportation services to eligible residents, serious deficiencies in operations, oversight, and data quality compromise its overall effectiveness.

The STAR program delivers essential services but is undermined by significant issues in operations, oversight, and data quality.

Despite a clear commitment to providing essential transit support, the program is hindered by unreliable data reporting from WeDriveU. Trip data reported by the vendor is incomplete and inconsistent, rendering it unsuitable for verifying invoice accuracy or assessing service performance. Audit testing identified substantial errors in reported trip outcomes and performance metrics. Additionally, the use of multiple, unintegrated software platforms by the Transdev Call Center and transportation providers creates inefficiencies and imposes excessive administrative burdens.

Key audit findings include:

Performance metrics do not provide assurance that STAR is meeting program goals.

1. Inadequate Performance Metrics: Existing metrics fail to demonstrate that STAR is meeting its program goals of providing a safe, equitable, accessible, reliable, and convenient transportation system. [See **Page 15**]

- a) One metric that assesses program safety is not calculated.
- b) Poor data quality compromises the validity of two metrics that assess service reliability.
- c) There is no checklist to assess ADA compliance for vehicles and customer assistance practices
- d) Customer feedback and invoice deductions are not being used to address performance issues.

Billed amounts for paratransit services were not consistent with contract rates.

2. Billing Discrepancies: Charges for paratransit services do not consistently reflect contractually agreed-upon rates. [See **Page 24**]

- a) WeDriveU used a Billed Revenue hour¹ calculation methodology that is not stated in the contract. A three-month analysis noted the following overbilled amounts:
 - 1. September, \$3,967
 - 2. October, \$6,652
 - 3. November, \$3,050
- b) WeDriveU billed the Transit Bureau for an additional 487 trips in the month of December. Amount overbilled was \$32,127.

Daily trip manifests are not properly checked after shifts.

3. Lack of Driver Manifest Review: Trip manifests are not properly reviewed or verified by WeDriveU at the end of service shifts. A review of 25 sampled

¹ Revenue hours are calculated from the time of passenger pick up to drop off.

routes per month in November and December found discrepancies between cash reported, coupons collected, and passenger counts versus the amounts reported on the monthly STAR Service Hours Report when compared to route manifest. [See Page 27]

- a) November error rate 53 percent
- b) December error rate 84 percent

Operational inefficiencies due to underutilized and misconfigured scheduling tools.

4. Operational Inefficiencies: Poor configuration and underutilization of scheduling tools by WeDriveU and Transdev result in avoidable inefficiencies and wasted resources. [See Page 30]

- a) A module within Trapeze called Trip Broker is not used to manage last minute trip change requests.
- b) The STAR on the Web portal allows customers to schedule trips that do not conform to program requirements.

The audit underscores a need for strengthened contractor management, streamlined technology solutions by WeDriveU and Transdev, and a complete overhaul of performance monitoring protocols.

What We Recommend

Based on the audit findings, the following actions are recommended to address the STAR program's deficiencies in performance oversight, billing accuracy, data integrity, and operational efficiency:

Strengthen performance metrics and incorporate customer feedback to better monitor program goals.

1. Strengthen performance metrics to improve goal monitoring. The Transit Bureau should improve or replace the performance metric for assessing program safety. It should direct WeDriveU to regularly validate ride data and improve data quality so that performance metrics for service reliability are an accurate reflection of actual performance. The Transit Bureau should work with WeDriveU and Transdev to develop a vehicle check list for ADA compliance verification and direct Transdev to use the checklist during random vehicle spot checks. The Transit Bureau should leverage customer feedback and applicable invoice deductions to identify and address performance issues.

Conduct a full five-year invoice analysis to recover overbillings and implement compliant billing procedures.

2. Recover Overbillings and Strengthen Billing Integrity. The Transit Bureau should conduct a full five-year reconciliation of WeDriveU invoices to quantify and recover overbilled amounts related to rounding and unapproved billing practices. This includes obtaining and

Strengthen fare collection controls and financial oversight.

Optimize scheduling and enforce program rules by enhancing STARontheweb.com and evaluate a unified platform.

reviewing historical Deadhead Hours² data and verifying December 2024 trip counts against manifests. Moving forward, the Bureau must work with WeDriveU to establish and enforce accurate, contract-compliant billing procedures.

3. Improve Fare Collection Controls and Financial Oversight. WeDriveU and County management must implement stronger internal controls over fare collection to address discrepancies in reported revenue. This includes standardizing fare reconciliation procedures, conducting monthly variance analyses, and introducing routine spot inspections of trip manifests. A comprehensive assessment of the revenue process is also needed to reduce reliance on cash handling, evaluate the feasibility of a unified scheduling system, and enhance overall financial integrity.

4. Optimize Scheduling Systems and Enforce Program Rules. To improve operational efficiency and reduce manual error, County management should ensure full deployment of Trip Broker through staff training and revised procedures that prioritize automated workflows. STARontheweb.com must be reconfigured to prevent invalid bookings and provide real-time user guidance. County management should also assess consolidating all scheduling into a single platform to streamline operations and enforce compliance across providers.

Management Response

We would like to extend our sincere thanks and appreciation to OCA for their thorough review of our STAR (Specialized Transportation for Arlington Residents) paratransit program's efficiency, effectiveness, and compliance with contract terms. This audit process has provided valuable insights into our STAR operations, highlighting areas for improvement. We recognize the time, effort, and expertise OCA has invested in this audit and are grateful for the constructive feedback received. The findings will be instrumental in strengthening our internal controls, enhancing compliance, and guiding our strategic improvements moving forward. We are committed to addressing the recommendations outlined and to maintaining a transparent and accountable paratransit program. In some cases, to address the noted

² Deadhead Hours are defined as time that the vehicle is not transporting a passenger, i.e., from garage departure to first pick up point or between the drop off point for one passenger to pick up point of the next passenger. Arlington County Transit Bureau & WeDriveU. (2014, April 14). *Paratransit Service* (Contract No. 603-13-2, Attachment 1).

areas for improvement, STAR contracts will need to be modified. This will take time and negotiation with both STAR contractors, WeDriveU and Transdev, which may exceed target timeframes since the County will not be in complete control of the timeline of negotiations. Typically, negotiated contract modifications that impose additional requirements or risk on the contractor(s) will have a cost impact to the County which may or may not be acceptable relative to the business risk and benefit. Additional resources for County oversight may also result from any contract modifications and will be similarly considered in a budget context. If the Transit Bureau is not able to reach easily enforceable and affordable negotiated modifications for all identified items with WeDriveU and Transdev, the remaining changes would be reconsidered as part of the scope(s) at the next competitive procurement opportunity(ies).

STAR is the complimentary paratransit component of Arlington Transit's fixed route bus service (ART) and serves Arlington residents who have difficulty using ART due to a temporary or permanent disability. STAR ensures equal access to transportation for people with disabilities, in compliance with the Americans with Disabilities Act (ADA). STAR plays a critical role in creating autonomy and independence for individuals as it removes barriers that may prevent individuals from accessing work, shopping, parks, healthcare, and education. Based on ADA, STAR provides complimentary paratransit service within ART's service area; however, STAR goes beyond ADA requirements by also providing additional complimentary paratransit service to areas served by the Washington Metropolitan Area Transit Authority's (WMATA) Metrobus, Metrorail, and MetroAccess. MetroAccess is the regional paratransit service established by the WMATA under the provisions of the ADA.

The Transit Bureau has already taken several steps towards improving internal controls for STAR and addressing the findings from this audit including:

- Developed a formula and definition for preventable crashes based on paratransit industry best practices.
- Reached agreement with WeDriveU and Transdev to implement Spare, which is a unified trip booking and management tool that allows the County, WeDriveU, and Transdev to look at

data in real-time from the same platform. Spare was initially implemented on June 2, 2025.

- Replaced starontheweb.us with <https://spare-rider-arlingtonstar-production.vercel.app/> which adheres to program requirements.
- Developed a draft ADA checklist for vehicles and customer assistance practices.
- Initiated a detailed review of WeDriveU's invoices over the past five years and identified overcharges resulting from rounding practices and formally requested full reimbursement from WeDriveU.
- Established a comprehensive billing review procedure for WeDriveU including agreed-upon standards for trip verification, billing accuracy, and supporting documentation. Implemented a review protocol to monitor ongoing compliance regarding invoicing and ensure billing transparency and ensures that these protocols are being utilized monthly to verify the accuracy of billed amounts.

STAR plays a critical role in ensuring mobility and accessibility for individuals with disabilities that reside in Arlington. However, STAR does face several challenges including but not limited to:

- **Staffing:** the Transit Bureau has 1.25 FTEs for oversight of a program which duplicates the regional MetroAccess service area. This audit provides multiple measures to strengthen the program's quality and oversight. To effectively implement the measures agreed to as result of the OCA audit, a significant increase in staff would be required, or the STAR service area must be reduced. For example, MetroAccess employs 39 FTEs for an area of 1 500 square miles, in comparison to the Transit Bureau staff of 1.25 FTEs covering the same 1 500 square miles area.
- **Service Coverage:** STAR goes well beyond ADA and other Federal requirements as it covers the same geographical area as MetroAccess. STAR is the only jurisdictional paratransit service in the region that provides this level of service coverage. Future considerations may include

reducing STAR service area to shift resources to program oversight activities that have been identified in this audit while simultaneously improving the quality of service by reducing logistical challenges associated with STAR's geographically large service area.

- **Changes to the Business Model:** The market has moved away from taxicab type service providers and shifted to rideshare providers like Lyft and Uber. This changing market results in a limited number of qualified operators which can meet the service area's coverage. This can impact schedule adherence, lead to increased wait times, and reduce the number of available trips. The Transit Bureau completed a competitively procured specialized transportation solicitation in November 2024, receiving a minimal number of qualified respondents.

STAR services are an essential component of a fully accessible and inclusive public transit system in Arlington. Despite the challenges noted above, we are committed to taking steps to enact corrective actions for improvement based on resource availability and working with our contractual partners. To ensure the long-term sustainability and reliability of STAR and to address some of the improvements within this audit, it may require strategic investments in staffing, technology, service planning, modifications to existing contracts, and/or policy changes to strictly adhere to Federal requirements related to STAR's service area. By addressing these challenges proactively, we can uphold our commitment to equity, independence, and mobility for all residents.

OCA Additional Comment

OCA agrees with the approach outlined regarding the consideration of cost impacts, business risk, and benefits when negotiating contract modifications. We recognize that additional requirements may introduce complexities for both contractors and the County, including the need for increased oversight resources.

Should the Transit Bureau conclude that implementing certain additional requirements is not cost-beneficial relative to the associated risks, we recommend maintaining sufficient documentation to support this determination. This documentation will be important to demonstrate how the decision aligns with the County's risk tolerance, fiscal responsibility, and overall program objectives, particularly if the items are deferred for consideration in a future procurement.

BACKGROUND

The Arlington County paratransit program, Specialized Transit for Arlington Residents (STAR), is a component of Arlington Transit (ART). STAR serves Arlington residents who have difficulty using public fixed route transit because of disability. STAR is a shared ride paratransit service intended to provide a comparable level of transportation as provided by ART, but also provides comparable level of transportation as provided by Metrobus, Metrorail and MetroAccess. The STAR program is administered by the Transit Bureau in the Department of Environmental Services (DES).

STAR program operates under guidance with the Americans with Disability Act (ADA) of 1990. *Under the Americans with Disabilities Act (ADA), paratransit functions as a 'safety net' for persons whose disabilities prevent them from using the regular fixed route system (bus or rail). It is not intended to meet all of the transportation needs of all persons with disabilities, all of the time.*³ STAR is not intended to be a replacement for official medical transportation or used in emergency situations.

The Arlington Transit Strategic Plan for FY 2025-2034 (Strategic Plan) states that its vision is to “provide a safe equitable, accessible, reliable, and convenient transportation system that effectively and efficiently sustains the environment, economy, and quality of life in Arlington.”⁴ Goal 3 of the Strategic Plan is to “deploy infrastructure and services equitably throughout Arlington.” One of the Goal 3 objectives is to “provide high-quality paratransit service and accessible infrastructure that allows everyone access to transportation.” Other objectives in the Strategic Plan include maintaining a clean, reliable fleet; promoting customer satisfaction and a culture of safety; delivering efficient and effective services; and meeting or exceeding transit performance metrics.

STAR operational services are provided by two contracted service providers: First Transit, Inc. (acquired by Transdev in March 2023) and Diamond Transportation (also known as WeDriveU). Transdev operates the Transdev Call Center and is responsible for administering the list of authorized STAR riders and providing trip scheduling services. As the Transdev Call Center operator, Transdev staff manages customer comments and inquiries regarding the STAR program. WeDriveU serves as the transportation carrier, providing the curb-to-curb service for eligible users. WeDriveU began a new contract with the County effective December 1, 2024. Previously two operators (Diamond Transportation which is now known as WeDriveU and Red Top Cab) provided these services. The Red Top contract ended November 30, 2024.

Key Program Statistics⁵

	CY 2020	CY 2021	CY 2022	CY2023	CY2024
Ridership	36,923	39,635	43,747	50,070	51,920
Trips Completed	30,669	32,383	39,139	43,271	44,240

³ Federal Transit Administration, *Americans with Disabilities Act (ADA) Paratransit Service Requirements*, <https://www.transit.dot.gov/why-does-americans-disabilities-act-ada-limit-paratransit-service-areas-where-there-already-bus> (last visited Feb. 18, 2025).

⁴ Virginia Department of Rail and Public Transportation, *Arlington Transit Strategic Plan FY 2025-2034*, October 2023.

⁵ Arlington Transit. (n.d.). ART Service Performance Dashboard. Arlington Transit. Retrieved April 2, 2025, from <https://www.arlingtontransit.com/about/performance-dashboard/>

	CY 2020	CY 2021	CY 2022	CY2023	CY2024
On Time Performance*	n/a	n/a	85.67%	89.17%	91.83%

* Target is 90%

The STAR service area is split between three zones and fares are based on zones. All trips are required to either begin or end in Arlington County.

- Zone 1 (\$4.50): Inside Arlington.
- Zone 2 (\$6.20): Trips to the District of Columbia (DC), the City of Alexandria, the City of Falls Church, or Fairfax County inside the Beltway as well as Inova Fairfax Hospital/Woodburn Mental Health campus at 3300 Gallows Road.
- Zone 3: Trips to Fairfax County outside the Beltway, Loudoun County, Montgomery County, or Prince George's County.

STAR has capacity for a limited number of weekday midday trips (approximately 10:00 AM - 2:30 PM) entirely outside Arlington County within Fare Zone 2 (see STAR Fares). In order to book a Zone 2 trip entirely outside of Arlington, it must be scheduled at the same time as a trip that starts or ends within Arlington.

Arlington's Transit Advisory Committee (TAC) has a subcommittee, Transit Accessibility, that reviews accessibility issues including access to transit vehicles, stops and stations and the specialized transit services provided by Metrorail, Metrobus, ART, Virginia Railway Express (VRE), STAR and MetroAccess. The seven-member Committee meets six times annually.

Program Operating Budget⁶

	FY 2021 (Actuals)	FY 2022 (Actuals)	FY 2023 (Actuals)	FY2024 (Actuals)	FY2025 (Budget)
Revenues	\$1,044,256	\$1,124,114	\$1,099,097	\$1,149,833	\$1,179,150
General Administrative	\$92,235	\$58,530	\$101,243	\$100,572	\$103,275
Transdev	\$451,378	\$722,762	\$727,559	\$756,637	\$774,299
WeDriveU	\$1,046,916	\$990,976	\$1,167,365	\$1,552,544	\$1,908,990
Red Top Cab	\$157,705	\$317,814	\$400,169	\$354,467	\$956,299
Expenses	\$1,748,234	\$2,090,082	\$2,396,336	\$2,764,220	\$3,742,863

⁶ Department of Environmental Services Budget and Finance, 2025. STAR Program Operating Budget Information. Email to Wayne Scott, 7 April 2025.

Revenues includes STAR program revenue and Virginia Department of Rail and Public Transportation (DRPT) operating support. STAR program revenue from customers averages \$158,175 annually from FY21 to FY24 and is budgeted at \$233k in the FY 2025 adopted budget. DRPT operating support is \$946,150 annually. The actual expenditures for STAR have come in under the budgeted amounts for fiscal years 2021 through 2024 according to Transit Bureau management.

Program Process and Performance Standards

Enrolling in STAR. Arlington County residents currently certified as eligible for MetroAccess are automatically certified for STAR. MetroAccess is the regional shared-ride paratransit service established by the Washington Metropolitan Area Transit Authority (WMATA) under provisions of the Americans with Disabilities Act (ADA). STAR is Arlington's alternative to using MetroAccess. STAR rides are provided on a curb-to-curb basis. Enrollment in the STAR program is initiated by completing an application and sending it to WMATA's Metro Access for review. In FY2025, STAR is providing services to 2,757 residents.

Arranging Rides. STAR rides are available between 5:30 a.m. and midnight, seven days a week. STAR has no restrictions on trip purpose. To request a trip, the eligible rider can reserve a ride calling the STAR Transdev Call Center or reserve online using the *STAR on the Web* portal (also referred to in this report as Starontheweb.com). Rides can be reserved one to seven days in advance. Generally, STAR requires riders to allow one hour between scheduled pickups. The Transit Bureau has a Rider Guide which provides program information and further instructions for standing order trips and same day rides.

Passengers are to pay the driver the applicable fare (depending on zone) at the start of the trip, paying with either cash or a STAR coupon. STAR coupons are tickets for use on the Arlington STAR paratransit system and are sold at the Commuter Store or can be purchased online at www.CommuterDirect.com.

Daily Schedule Implementation. At the end of each day, the Transdev Call Center prepares daily trip manifests by route and sends it to WeDriveU to assign trips to drivers. Manifests are prepared using a software application, Trapeze, which schedules trips based on pickup time, origin and destination and any other reasonable accommodation requests made by passengers. WeDriveU uploads manifests into an application called Ecolane for route and driver assignment for the following day.

For the day of the trip, each driver is provided with a trip manifest listing the chronological order for passenger pick and drop off. Depending on the scheduled route and time, several passengers may be assigned to the same vehicle.

Last minute trip changes due to changes requested by the customer or trips requiring a change due to schedule are managed by the Transdev Call Center. The Transdev Call Center will then contact WeDriveU to communicate the change and once accepted trip manifest are updated within Trapeze and Ecolane.

Customer Feedback. The Transdev Call Center is responsible for managing passenger complaints and comments which can be filed online, directly with the Transdev Call Center, or via email. All complaints and comments are logged into the STAR Comment Ticket System for tracking and response. The Transdev contract requires complaints to be resolved no later than 3 days after receipt.

Performance Metrics and Standards. The Transit Bureau is responsible for providing oversight of contractor performance to ensure the STAR program achieves its goals. The contracts identify metrics and other standards by which to measure contractor performance. Performance metrics apply to Transdev Call Center responsiveness, timely ride pick-ups, ride time (duration), and preventable crashes. The contracts also stipulate that deductions (penalties) can be assessed on monthly invoices when performance does not meet the

standard. Deductions apply to inadequate Transdev Call Center responsiveness, untimely ride pick-ups, excessive ride duration, and inadequate vehicle safety or comfort. Deductions may be made on a per trip, per vehicle, or monthly basis.

FINDING 1 – PERFORMANCE METRICS DO NOT PROVIDE ASSURANCE THAT STAR IS MEETING PROGRAM GOALS

OCA examined performance metrics and standards for four key goals of the STAR program: Safety, Reliable Service, ADA Compliance, and Customer Focus.

Safety

ART strives to provide a safe and secure transit system. The safety of STAR passengers and vehicles is an important element of the program.

Criteria

- Metric:
 - Preventable crashes per 100,000 miles.
- Standards:
 - Preventive maintenance on vehicles is to be conducted on a recurring basis.
 - Random vehicle spot checks are to be performed.
 - \$100 is to be deducted from the monthly invoice for each vehicle that fails the state-mandated bi-annual safety inspection.
 - \$25 per day per vehicle is to be deducted from the monthly invoice for each vehicle whose interior is not free of pesticides and noxious smelling chemicals.

Condition

- Transit Bureau officials do not calculate the preventable crashes metric. During November 2024 through January 2025, WeDriveU reported three minor accidents to the Transit Bureau, each involving a STAR vehicle striking a parked vehicle. No injuries were reported.
- Transdev did not perform random vehicle spot checks between October 2024 and March 2025.
- Transit Bureau officials said that invoice deductions for safety-related reasons were not made between January and November 2024.

Cause

- Transit Bureau officials do not calculate the preventable crashes metric because there is no established tolerance level.
- Transdev did not perform vehicle spot checks from October 2024 through March 2025 because of personnel changes.
- The WeDriveU contract does not require the provider to monitor its own performance and calculate deductions prior to invoicing when it fails to meet the reliable service performance standards.

Effect

The Transit Bureau cannot assure the STAR vehicle fleet is being maintained in safe operational condition without routine inspection. The only performance metric that relates to vehicle safety is not effective; vehicle safety oversight is infrequent and ad hoc; and vehicle interiors are not being inspected for hazardous substances. As a result, the process of enforcing vehicle safety through invoice deductions is not working.

Recommendation

- Assess whether the preventable crashes metric is the most appropriate safety performance metric for the STAR program. If it is retained, establish a formula and tolerance level for preventable crashes and resume its calculation.
- Ensure Transdev continues to perform random vehicle spot checks to ensure that vehicle conditions are in compliance with the terms of the WeDriveU contract, especially regarding safety, accessibility compliance, hazardous pesticide application, passenger comfort, and fitness for operations.
- Develop and implement a plan for conducting the semiannual inspections. The plan should address how the Transit Bureau will identify when vehicles fail the biannual safety inspection and how the required deduction will be applied to monthly invoices.
- Direct WeDriveU and Transdev to include incurred safety-related deductions in their monthly invoices prior to submitting them to the Transit Bureau.

Reliable Service

A key goal for the STAR program is the provision of timely, reliable transportation to clients who have difficulty using public fixed route transit because of cognitive or physical disabilities.

Criteria

- Metrics:
 - 90% of passenger pick-ups each month are to occur within ten minutes of the scheduled pick-up time (on-time performance).
 - Ride time⁷ should not exceed 2 hours, except in extreme weather circumstances.
- Standards:
 - \$800 is to be deducted from the invoice if average monthly on-time performance falls below 90%.
 - \$100 is to be deducted from the monthly invoice for each ride that exceeds 2 hours.

Condition

- During July 2022 through February 2025, STAR pick-ups met the timeliness standard about 89% of the time. While monthly on-time performance in 2024 averaged nearly 92%, such performance has averaged about 85% since the new contract was awarded in December 2024.
 - On-time performance for December 2024 through February 2025 was 83%, 84%, and 89%, respectively.
 - At the time of OCA testing in April 2025, the Transit Bureau had not requested deductions for the invoices for these months. The December 2024 and January 2025 invoices were delayed in processing by the Transit Bureau due to invoicing errors caused by WeDriveU.
- OCA testing of passenger ride data from WeDriveU's Ecolane system identified 15 rides in December 2024 through February 2025 that appeared to exceed 2 hours.

⁷ Ride time is calculated from passenger pick up to drop off.

- After bringing these to the Transit Bureau's attention, the Transit Bureau followed up with WeDriveU, which determined that the ride data contained errors. WeDriveU reviewed the paper manifests for the rides in question, which showed that none of the rides exceeded 2 hours.
- The Ecolane onboard tracking system does not always capture accurate ride arrival and departure data.
- OCA testing determined that, during December 2024 through February 2025, 486 of 10,125 scheduled rides (4.8%) resulted in a passenger no-show.⁸
 - Transdev contacts clients after two no-shows to determine the cause and check on their wellbeing.
 - Neither the Transit Bureau nor Transdev have analyzed program level no-show data to identify trends or consider solutions to reduce their frequency.

Cause

- The Transit Bureau and the service providers have been adjusting to a new contract with new requirements and a new revenue model.
- The WeDriveU contract does not require the provider to monitor its own performance and calculate deductions prior to invoicing when it fails to meet the reliable service performance standards.
- Passenger trip data is not verified against paper manifests or reviewed by WeDriveU management to ensure accuracy (*also see Audit Finding 3*).
- The STAR program does not have performance metrics that apply to customer behavior.

Effect

STAR on-time performance has declined since the implementation of the new contract, and the Transit Bureau has been slow to request invoice deductions to emphasize the importance of meeting timeliness standards. However, the more significant challenge lies in data quality: inaccurate and unreliable ride data in Ecolane limits the Bureau's ability to accurately measure and report on service reliability. Additionally, the absence of a proactive strategy to reduce no-shows contributes to daily service disruptions. Collectively, these issues increase the risk that the STAR program may not adequately meet client needs potentially worsening transportation barriers for its users.

Recommendation

- The Transit Bureau should direct either WeDriveU or Transdev to calculate incurred service-related deductions in their monthly invoices prior to submitting them to the Transit Bureau.
- The Transit Bureau should direct WeDriveU to regularly validate ride data by comparing it to paper manifests to ensure that service reliability performance metrics correctly reflect actual performance.
- The Transit Bureau should develop and implement a formal process to monitor aggregate monthly no-show data. The process should include conducting trend analyses and establishing defined thresholds that trigger a root cause analysis. The objective is to identify and address underlying issues in order to reduce no-shows and maintain service reliability.

⁸ A no-show occurs when the WeDriveU vehicle arrives at the designated pick-up location but the passenger is not present to take the requested ride.

ADA Compliance of Vehicles and Customer Assistance Practices

The ADA requires that when a public entity contracts with a private entity to operate an on-demand service, the public entity is responsible for ensuring that the private entity meets ADA requirements that would apply if the public entity provided the service itself. The Transit Bureau is responsible for ensuring the WeDriveU complies with the vehicle and customer assistance standards in the contract that supports STAR's compliance with the ADA.

Criteria

- Standards:
 - WeDriveU is required to provide wheelchair accessible vehicles that are fully compliant with ADA requirements.⁹ Vehicles must be of an appropriate width and length; equipped with wheelchair lifts or ramps that meet ADA standards; and include wheelchair securements for any type of wheelchair.
 - WeDriveU drivers are to be trained in how to assist passengers with limited mobility and, prior to moving their vehicles, ensure that each passenger is seated, occupant seat belts are securely fastened, and wheelchairs and wheelchair passengers are properly secured.¹⁰

Condition

- Based on contractual terms, the Transit Bureau relies on contractor personnel from WeDriveU and Transdev to ensure STAR vehicles and customer assistance practices meet ADA standards without independently verifying compliance.
- The Transit Bureau has not developed formal guidance or procedures for inspecting STAR vehicles and reviewing customer assistance practices to ensure compliance with ADA requirements.

Cause

The Transit Bureau does not have independent expertise on ADA standards and has not established procedures for the independent verification of certain ADA requirements. The Transit Bureau is overly reliant on contracted companies to demonstrate compliance of vehicles and customer assistance practices with ADA.

Effect

This reliance may limit the Transit Bureau's ability to ensure consistent adherence to ADA standards and may increase the risk of noncompliance. Without a checklist or procedures for inspecting applicable vehicles and evaluating customer assistance practices, there is an increased risk that vehicles may not meet certain ADA standards.

Recommendation

The Transit Bureau should work with WeDriveU and Transdev to develop a checklist to ensure STAR vehicles and customer assistance practices comply with ADA standards. Also, the Transit Bureau should benchmark

⁹ Arlington County & Diamond Transportation, 2024, Exhibit A, Section C.

¹⁰ Arlington County & Diamond Transportation, 2024, Exhibit A, Section D.

with other municipalities or WMATA to inquire if they have a checklist which could be leveraged. The Transit Bureau should direct the Transdev Call Center to use this checklist when it does its required spot checks.

Customer Focus

ART endeavors to promote public transportation as an attractive option for Arlington residents. The viability of the STAR program is enhanced when clients can easily and reliably schedule rides and provide feedback about how the program is serving their needs.

Criteria

- Metrics:
 - 100% of ride-scheduling calls are to be answered within 90 seconds.
 - Not more than 2% of ride-scheduling calls shall be abandoned during Transdev Call Center working hours.
- Standards:
 - \$500 is to be deducted from the monthly invoice if call responsiveness falls below 95%.
 - \$500 is to be deducted from the monthly invoice if the abandonment rate exceeds 2 percent.
 - Safety-related customer complaints are to be addressed by the next business day.
 - Non-safety related customer comments are to be addressed within 3 days of receipt of comment.
 - Vehicle interior vehicle temperatures are to meet prescribed standards; penalties can be assessed when vehicles are non-conformant.

Condition

- Transdev data indicates that calls are generally answered in a timely manner, but the monthly call abandonment rate has at times exceeded the 2 percent target.
 - The call abandonment rate exceeded 2 percent in 4 of the 12 months from July 2023 through November 2024 for which the Transit Bureau received call responsiveness data from Transdev.¹¹
 - The Transit Bureau has not requested invoice deductions for the months when the abandonment targets were not met.
- Available Transdev Call Center data and customer comments indicate that customers may have issues connecting with drivers:
 - Of 2,683 calls made to the Transdev Call Center in March 2025, 350 (15%) were from customers checking on the status of their ride. Transdev Call Center staff are unable to view vehicle actual location and requires the Transdev Call Center to contact WeDriveU to obtain the vehicle actual location.
 - Of 141 customer complaints and comments submitted between July 2023 through December 2024, 26 (18%) related to driver responsiveness or timeliness (i.e., no show, late arrival, late pickup).
- Other common customer complaints between July 2023 through December 2024 related to operational safety and vehicle cleanliness or odor. Vehicle interior comfort is not being monitored.

¹¹ Transdev did not provide call responsiveness data to the Transit Bureau from March through July 2024 because it was implementing a new phone system.

- In January 2025, the Transit Bureau issued a policy to require that customer comments be addressed within two weeks of the comment date, which is longer than contract requirements. The Transit Bureau took this action because comments were not being addressed in a timely manner.

Cause

- The Transit Bureau is not leveraging the use of available call data and customer feedback to identify trends based on complaints to seek additional improvements in STAR program quality.
- The Transit Bureau does not require Transdev to track its own performance against call timelines and call abandonment standards or to calculate and apply invoice deductions for noncompliance before submitting monthly invoices.

Effect

Due to inadequate use of call data and customer feedback, and the lack of contractor self-monitoring requirements, the Transit Bureau has limited visibility into STAR program performance and contractor compliance. This impairs timely identification and correction of service quality issues, reduces accountability for poor performance, and increases the risk of ongoing service deficiencies and inefficient use of public funds.

Recommendation

- The Transit Bureau should use available data to monitor program performance on a daily or at least weekly basis and establish key measures and tolerance levels for key indicators to help identify when performance is slipping below program standards.
- The Transit Bureau should improve its monitoring of Transdev Call Center data and customer comments, including the timeliness of contractor responsiveness, and leverage this information to identify and address trends that may affect performance and the achievement of program goals.
- The Transit Bureau should direct Transdev to apply incurred call timeliness and abandonment deductions to their invoice prior to submitting it for payment.

Management Response

Management acknowledges OCA's recommendations and recognizes the importance of safety, reliable service, ADA compliance, and customer focus. These are critical pieces to enhance data monitoring and contractor accountability to ensure consistent program performance and customer satisfaction.

Modification of the STAR contract(s) will be necessary to improve efficiency and oversight. This will take time and negotiation with WeDriveU and Transdev, which may exceed targeted timeframes since the County will not be in complete control of the timeline of negotiations. Typically, negotiated contract modifications that impose additional requirements or risk on the contractor(s) will have a cost impact to the County which may or may not be acceptable relative to the business risk and benefit. Additional resources for County oversight may also result from any contract modifications and will be similarly considered in a budget context. If the Transit Bureau is not able to reach easily enforceable and affordable negotiated modifications for all identified items with WeDriveU and Transdev, the remaining changes would be reconsidered as part of the scope(s) at the next competitive procurement opportunity(ies).

The Transit Bureau has taken and will take the following actions:

Safety

The Transit Bureau agrees that preventable crashes are the most appropriate safety performance metric for the STAR program. Within 160 days, the Transit Bureau will seek contract modifications with WeDriveU and Transdev focusing on a formula to calculate a preventable crash rate and providing a definition for preventable crash(es). The Transit Bureau will also seek a contract modification with WeDriveU by December 2025 and will negotiate a deduction amount if the preventable crash rate exceeds 1 per 100,000 miles each contract year. If the contract modifications are accepted by WeDriveU and Transdev, the Transit Bureau will implement the new formula and definition within the first month of contractual acceptance.

Regarding performing random vehicle safety spot checks, the Transdev Call Center conducted their first spot check in calendar year 2025 on April 1, 2025. The Transit Bureau will continue to work with Transdev to ensure random vehicle safety spot checks are performed, and that the Transdev Call Center documents and submits their findings. The Transit Bureau will ensure that the Transdev Call Center follows their contractual requirement for spot checks which notes at a minimum, conduct one (1) vehicle condition spot check for each 1,000 rides provided each month scheduled through the Transdev Call Center, with those spot checks apportioned over the course of a year with one-third of the checks conducted on dedicated vehicles, to ensure that they are in compliance with the requirements provided under this contract, as well as the County contracts with the dedicated vehicle contractor(s) and the taxi-dispatch contractor(s).

The Transit Bureau will ensure that WeDriveU follows their contractual requirements for safety inspections. Per the existing contract with WeDriveU, WeDriveU is responsible for annual state emission and safety inspections of all vehicles and all costs associated with the inspections and remedying any deficiencies. In addition, WeDriveU must perform bi-annual inspections that include the following: safety, accessibility compliance, hazardous pesticide application, passenger comfort and fitness for operation under this contract. The Transit Bureau will request documentation before December 31 of each year to ensure WeDriveU is adhering to this contractual requirement.

Within 160 days, the Transit Bureau will seek a contract modification with WeDriveU to clarify the current preventive maintenance deduction which notes the County will deduct \$100 from the WeDriveU invoice each time a WeDriveU vehicle fails the bi-annual County-mandated inspection. The Transit Bureau will seek to add an additional clause and deduction for each time a vehicle fails to pass the Commonwealth of Virginia's safety and emission inspection. The Transit Bureau will also seek a contract modification to amend language noting the County will periodically inspect all vehicles used in the performance of services. Due to limited staff resources, the Transit Bureau will seek to shift this requirement to a party selected by the County. Also, as currently stated in the contract with WeDriveU, any hazardous pesticides found inside vehicles will incur a deduction of \$25 per non-complying vehicle per day from the amount due to WeDriveU, the Transit Bureau will move forward in enforcing this provision.

Within 120 days, the Transit Bureau will work with WeDriveU and the Transdev Call Center to create an accident review board which will be made up of County staff as well as staff from WeDriveU and the Transdev Call Center. The accident review board will meet at least once a month if there is a crash within such month and will evaluate accidents, documents, data, and safety items related to such crash(es) to determine the preventability of accidents. The Transit Bureau will document the findings for each crash evaluation and will save such record for 5 years.

Reliable Service

The Transit Bureau agrees with this recommendation and will work with WeDriveU and the Transdev Call Center to implement a policy and Standard Operating Procedure (SOP) within 160 days. The policy and SOP will establish a method to calculate and apply all incurred service-related deductions (e.g., late arrivals, missed trips) in the monthly invoices prior to submission. This approach will reinforce performance accountability and streamline invoice review and processing. The policy will be communicated in writing and integrated into future contract amendments and renewals.

To improve data accuracy, in April 2025, the Transit Bureau reached agreement with WeDriveU and the Transdev Call Center to implement Spare, which is a software/app tool that allows for real-time tracking, easier ride scheduling, and allow STAR users to pay using a credit and/or debit card. Within 160 days, Transit Bureau will seek a contract modification with Transdev to include additional language for trips scheduled via Spare.

Spare, which is a subcontractor to WeDriveU, is a unified platform for trip scheduling and management which the Transdev Call Center, WeDriveU, and the Transit Bureau started utilizing on June 2, 2025. The inclusion of payment by debit and/or credit cards is slated to be implemented via Spare by December 31, 2025. Spare allows for a streamlined data flow and provides stronger contractual and financial oversight of the STAR program as it allows the Transit Bureau, WeDriveU, and the Transdev Call Center the ability to use the same software platform and review data in real time. As part of the monthly reconciliation process as outlined in the response on Finding 3, the Transit Bureau, WeDriveU, and the Transdev Call Center will verify passenger trip data by reviewing reports daily, monthly, and weekly reports generated by Spare to ensure accuracy. This will eliminate the utilization of paper manifests. This procedure will include clear documentation protocols through a SOP for any variances identified.

The Transit Bureau agrees that no-shows contribute to service inefficiencies and prevent optimal scheduling; however, the Transit Bureau has an existing established no-show policy and strategy outlined in the STAR Rider Guide which includes:

STAR customers are currently allowed three (3) no-shows within a thirty-day period; if this is exceeded, a STAR customer will be suspended for 7 days. For the first suspension resulting from excess no-shows, the suspension period is 7 days. If a STAR customer exceeds the no-show policy twice within a calendar year, there is a 14-day suspension. If a STAR customer exceeds the no-show policy three times within one calendar year, there is a 21-day suspension.

- Based on the findings and recommendation, the Transit Bureau will strengthen its program level no-show monitoring strategy and will seek a formal process to monitor aggregate monthly no-show data and monitoring trends to include: Tracking patterns by STAR users.
- Conducting trend analyses and exam the root causes to address underlying issues of STAR users to reduce no-shows and maintain service reliability.
- Stressing outreach and education to STAR users via email newsletters, social media, and posting information on the STAR section of arlingtontransit.com to reduce preventable no-shows.
- Potential longer suspension periods for STAR customers who exceed three (3) no-shows within a thirty-day period.

Strengthening the program level no-show monitoring strategy and analyzing trends will be finalized within 160 days and integrated into the Transit Bureau's ongoing service performance monitoring framework and STAR Rider Guide.

ADA Compliance of Vehicles and Customer Assistance Practices

The Transit Bureau will work with WeDriveU and the Transdev Call Center to establish a checklist for verifying ADA compliance for vehicles and customer assistance practices. STAR currently goes beyond the ADA service requirements which requires STAR to provide service within ART's service area, Arlington County. STAR provides additional coverage like MetroAccess outside of Arlington and serves the City of Alexandria, the City of Falls Church, Fairfax County, Loudoun County all within the Commonwealth of Virginia, the District of Columbia, as well as Montgomery and Prince George's Counties in Maryland. Contractual terms for both WeDriveU and Transdev state that both contractors are solely responsible for compliance with ADA and shall defend and hold the County harmless from any expense or liability arising from the Contractor's non-compliance. The Transit Bureau has established ADA compliance parameters within the STAR program which have been in place for years; however, the Transit Bureau has developed a draft detailed checklist for vehicles and customer assistance practices to help start / guide the conversations with WeDriveU and the Transdev Call Center and is seeking to implement this within 160 days pending contract modifications.

Customer Focus

The Transit Bureau will strengthen its review of available Transdev Call Center data and customer feedback to monitor STAR program performance with Spare. A set of key performance indicators (KPIs) will be monitored, including but not limited to call volume trends, call wait times, call abandonment rates, average response times to customer inquiries and complaints, and trends in customer satisfaction and recurring issues.

These indicators will be monitored bi-weekly, and the Transit Bureau will send notification to the Transdev Call Center when performance falls outside acceptable tolerance levels. This will enable more timely identification and resolution of service issues.

To ensure greater accountability, within 120 days, the Transit Bureau will work with the Transdev Call Center to ensure existing contractual requirements are being followed for reporting its performance against established call timeliness and abandonment rate standards, calculating applicable deductions related to performance, and applying such deductions directly to their invoice before submission.

This expectation will be formally communicated and incorporated into a SOP. The Transit Bureau will also ensure that Transdev Call Center responsiveness to customer concerns is tracked and evaluated as part of ongoing performance reviews. Compliance will be verified by the Transit Bureau during the invoice review process.

The Transit Bureau remains committed to strengthening oversight of practices and ensuring that program standards are consistently met.

FINDING 2 – BILLED AMOUNTS FOR PARATRANSIT SERVICES WERE NOT CONSISTENT WITH CONTRACT RATES

Criteria

The County is required to pay paratransit service providers the rates agreed upon as specified in the contract:

- **WeDriveU contract dated, May 31, 2024¹²:** Hourly rate for dedicated vehicle hours of service, non CDL accessible vehicles. Units: Revenue Hours. Rate per hour: \$35.65
- **WeDriveU contract dated, November 26, 2024¹³:** Billed rate per completed trip \$65.97.

Condition

Effective December 1, 2024, with the new STAR operations contract, WeDriveU's billing methodology changed from an hourly rate to a completed per-trip rate. In response to this change, OCA selected one month from each contract period to verify the accuracy of billed amounts for paratransit services. The following discrepancies were identified:

- **November 2024:** Billed revenue hours exceeded actual revenue hours by 87.4 hours. Also, WeDriveU did not deduct any Deadhead Hours¹⁴ when calculating revenue hours, resulting in overbilling.
- **December 2024:** The Transit Bureau was billed for 398 more trips than actual trips performed. OCA conducted further testing of the detailed data file containing all completed routes for December. A sample of 25 routes (215 trips) were selected to verify that completed trips matched the trips authorized per the daily manifests. The following errors were noted:
 - Fifty-eight (58) billed trips were not completed, as the routes were cancelled for that day.
 - Thirty-one (31) trips were billed but were not listed on a daily route manifest.

Cause

- For November 2024, WeDriveU rounded revenue hours up to the next quarter-hour or applied an eight-hour daily minimum, a practice not stipulated in the contract dated May 31, 2024. The practice of rounding up results in a higher amount billed to the Transit Bureau. When we discussed this with WeDriveU, the current General Manager indicated that this method was part of the invoice preparation training upon assuming the role. Additionally, in an email dated September 26, 2023, the former General Manager confirmed that this has been the standard practice for calculating billed revenue hours. Also, WeDriveU did not report or account for any Deadhead Hours for their vehicles when calculating revenue hours which would have reduced the billed revenue hours.
- In December 2024 due to a contractual change, the Transit Bureau was invoiced based on the number of passengers transported rather than the number of completed trips. Additionally, based on our testing, WeDriveU did not verify invoice accuracy before submitting it to the Transit Bureau.

¹² Original contract signed April 15, 2014, and as amended.

¹³ Arlington County. (2024, November 26). *Contract C25140 STAR Transportation between Arlington County and Diamond Transportation Service, Inc.*

¹⁴ Drop off of a passenger to the starting time of the next trip. Federal Transit Administration. (n.d.). *National Transit Database (NTD) Glossary*. U.S. Department of Transportation. Retrieved April 3, 2025, from <https://www.transit.dot.gov/ntd/national-transit-database-ntd-glossary>.

Effect

The cumulative effective of this overbilling \$35,244 and is calculated as follows:

Month	Billed Hours/Trips	Actual Revenue Hours/Trips	Overstated Amounts	Overbilling Amounts
November	2,444.25 hours	2,358.70 hours	85.55 hours	\$3,050
December	3,626 trips	3,228 trips	398 trips	\$26,256
December Adjustments	-	+58 canceled routes, +31 unlisted trips	Total overage: 89 trips	\$5,871
			Total	\$35,177

Noting these discrepancies, OCA calculated the potential impact of WeDriveU's revenue hour rounding practice. Analyzing two additional months of invoices, we determined that the Transit Bureau was potentially overbilled in September by \$3,967 and \$6,652 in October. OCA is unable to calculate the effect of charging for Deadhead Hours as those hours were not reported by WeDriveU.

During the audit, Transit Bureau staff were reviewing the December 2024 invoice, which had not yet been paid. Upon learning of the billing error that OCA identified, the Transit Bureau contacted WeDriveU and requested a revised invoice. WeDriveU issued a revised invoice that reduced the amount owed by \$26,256.00 (398 trips × \$65.97).

Recommendation

The Transit Bureau should examine WeDriveU invoices for the past five years¹⁵ to determine the total amount overbilled due to rounding practices and seek full reimbursement for those charges. The Transit Bureau should also request the number of Deadhead Hours from WeDriveU for the same period to calculate any overages and seek reimbursement.

The Transit Bureau should collaborate with WeDriveU to verify actual completed trips for December 2024 by comparing each route to the trip manifest and request reimbursement for any additional billed but not performed trips. The Transit Bureau should collaborate with WeDriveU to establish and maintain comprehensive and accurate billing procedures, ensuring the accuracy of future invoices.

Management Response

Management acknowledges OCA's findings concerning potential overbilling by WeDriveU due to rounding practices and unverified trip charges. The Transit Bureau is committed to ensuring fiscal accountability and protecting program resources through accurate billing and strong vendor oversight and the following actions have been taken:

¹⁵ Diamond Transportation Service, Inc. Contract Number 603-13-2. (2014, April 15). *Contract Terms and Conditions*, Section III, Clause 35. Office of the Purchasing Agent.

Historical Invoice Review and Reimbursement Efforts:

In March – April 2025, the Transit Bureau initiated a detailed review of WeDriveU's invoices over the past five years and identified overcharges resulting from rounding practices. This review was conducted in coordination with a DES Management and Budget Specialist and the OCA to ensure accuracy and transparency. Based on the analysis, the Transit Bureau determined that the amount overbilled was \$108,557.92, and on May 29, 2025, the Transit Bureau formally requested full reimbursement from WeDriveU. WeDriveU acknowledged receipt of this request and noted they will review and provide a response.

Within 120 days, the Transit Bureau will request that WeDriveU provide the number of Deadhead Hours over the past five years. Upon receipt, the Transit Bureau will work with a DES Management and Budget Specialist to calculate any overages and seek reimbursement if required from WeDriveU.

December 2024 Trip Validation:

In February - March 2025, the Transit Bureau worked with WeDriveU to verify all completed trips for December 2024. This effort included comparing billed routes against trip manifests to identify any discrepancies, such as billed but unperformed trips, as well as the performance of revenue variance analysis to identify anomalies in the billed amount. As a result, WeDriveU re-submitted December invoices with corrected trip amounts that matched the validation findings.

Strengthening Future Billing Procedures:

To prevent recurrence of similar issues, in February 2025, the Transit Bureau established a comprehensive billing procedure with WeDriveU. This included agreed-upon standards for trip verification, billing accuracy, and supporting documentation. As of February 2025, the Transit Bureau has implemented a review protocol to monitor ongoing compliance regarding invoicing and ensure billing transparency and ensures that these protocols are being utilized on a monthly basis to verify the accuracy of billed amounts. Revised billing procedures were finalized and implemented in March 2025. Within 120 days, a SOP for verifying the accuracy of billing for STAR services will be implemented to reflect the established procedure.

The Transit Bureau is committed to maintaining the integrity of the County's financial management processes and strengthening vendor accountability through these corrective actions.

FINDING 3 – DAILY TRIP MANIFEST ARE NOT PROPERLY CHECKED AFTER SHIFTS

Criteria

WeDriveU is to provide services consistent with the C251 40 STAR Transportation contract (2024, November 26).¹⁶

- a) *The Contractor must transport persons with disabilities from their place of origin to designated locations, unless otherwise directed by the Project Officer, and return them to their destination. (C251 40 STAR Transportation, 2024, Exhibit A, Scope of Service A, General, Clause 3.).*
- b) *Work with the Transdev Call Center and the County to verify schedules for all trips to ensure accuracy. (C251 40 STAR Transportation, 2024, Exhibit A, Scope of Service B, General Responsibilities of the Contractor, Clause 3).*
- c) *Cash fares must be retained by the Contractor and deducted from the monthly bill. When STAR Coupons are used to pay fares, the STAR Coupons must be returned to the SCC with the monthly bills. (C251 40 STAR Transportation, 2024, Clause 7, Payment).*

Condition

A review of 25 sampled routes per month in November and December found discrepancies between cash reported, coupons collected, and passenger counts versus the amounts reported on the monthly STAR Service Hours Report when compared to route manifest prepared by drivers.

Month	Number of Routes Tested	Number (%) of Routes with Errors	Number of Routes by Error Type Found*		
			Cash	Coupon	Passenger Count
November	25	13 (52%)	7	11	1
December	25	21 (84%)	11	13	14

* Some routes had both cash and coupon errors.

Cause

Manifest verification procedures were inconsistently performed at the end of shifts. Additionally, using multiple software applications for trip scheduling and management hinders efficient and effective trip verification.

Effect

The discrepancies identified between coupons collected and cash reported versus the amounts on the monthly STAR Service Hours Report indicate weaknesses in fare collection and reconciliation processes. With errors found in over half of the sampled routes in November and over 80% in December, the frequency and volume of these discrepancies raise concerns about the reliability of reported revenue data. These inconsistencies may result in unaccounted or misappropriated funds, undermining financial integrity and exposing the Transit Bureau to internal control risks. Furthermore, inaccurate reporting can impair operational decision-making, particularly in evaluating STAR program performance and resource allocation. The findings suggest a need

¹⁶ Arlington County. (2024, November 26). Contract C251 40 STAR Transportation between Arlington County and Diamond Transportation Service, Inc.

for strengthened internal controls, improved oversight, and staff training to ensure accurate fare reporting and safeguard public resources.

Recommendation

Management should strengthen internal controls over the fare collection and reporting processes to address the high rate of discrepancies noted between STAR coupons, cash collected, and amounts reported in the monthly STAR Service Hours Report. The following will strengthen the accuracy of financial reporting:

- a) Implement a standardized reconciliation procedure that requires regular verification of fare collection records against reported data, and the documentation of any variances. WeDriveU staff responsible for fare handling and reporting should receive targeted training to ensure understanding of proper procedures and the importance of accurate reporting.
- b) County management should perform periodic spot inspections by requesting a sample of manifest each month to compare to the trips scheduled.
- c) Perform a monthly analysis to compare estimated revenue based on completed trips to the actual revenue reported. Variances exceeding a pre-established threshold should be investigated.
- d) Due to the inherent risks with the current revenue process, particularly those involving cash, management should conduct a comprehensive assessment of the end-to-end process. The objective should be to determine the feasibility of redesigning the process to establish a more robust, cost-effective framework that enhances revenue accuracy, mitigates risk, and strengthens overall financial internal controls. As part of this assessment, Management should assess the feasibility of requiring the Transdev Call Center and all contracted transportation providers to use one unified application for trip scheduling and management.

These measures will help improve the accuracy of financial reporting, reduce the risk of revenue loss or misappropriation, support better operational decision-making, and enhance compliance with financial oversight expectations.

Management Response

Management acknowledges OCA's findings related to discrepancies in STAR fare collection and reporting, and fully supports the recommendations provided to strengthen internal controls and improve financial accuracy. The Transit Bureau recognizes the importance of robust controls in the fare collection process to ensure accountability, minimize revenue loss, and support accurate financial reporting. In response to OCA's recommendations, the Transit Bureau will implement the following measures:

Standardized Reconciliation Procedure and Staff Training:

Within 160 days, the Transit Bureau will develop and implement a standardized reconciliation process requiring regular comparison of STAR coupons, cash collected, and data reported in the monthly STAR Service Hours Report. This process will also factor in the ability to capture data from a new credit and debit card payment system with the implementation of Spare. The inclusion of payment by debit and/or credit cards is expected to be implemented via Spare by December 31, 2025. This procedure will include clear documentation protocols for any variances identified. The Transit Bureau will provide protocols to WeDriveU regarding fare handling and reporting and will conduct an annual training with WeDriveU (or any future service provider) by no later than December 31 to ensure proper procedures are being followed and to stress the importance of accurate, transparent reporting.

Monthly Spot Inspections:

The Transdev Call Center has conducted spot inspections in the past to check in on the performance of the STAR program. To enhance oversight and accountability, the Transit Bureau will ensure that the Transdev Call Center conducts spot inspections per contractual requirements and report their findings. A random sample of completed manifests will be selected and reviewed against trip schedules to verify reported data and detect inconsistencies. With the introduction of Spare, the Transit Bureau will work with the Transdev Call Center and WeDriveU monthly to review and check the Spare data reporting system for accuracy and inconsistencies.

Monthly Revenue Variance Analysis:

In April 2025, the Transit Bureau implemented a new control which requires monthly analysis comparing estimated fare revenue from completed trips with actual revenue reported. Variances that exceed a pre-established threshold of 3 percent are flagged for investigation. This analysis has been and will continue to be reviewed by a DES Management and Budget Specialist to ensure timely resolution of discrepancies.

Comprehensive Process Assessment and Feasibility Review:

Given the risks associated with the current cash-based revenue model, within 160 days, the Transit Bureau will undertake a comprehensive assessment of the entire fare collection process. This assessment will evaluate opportunities to redesign the system to improve accuracy, reduce risk, and enhance internal controls. As part of this effort, the Transit Bureau is implementing the ability for STAR users to pay for trips via debit/credit cards on the Spare app or Spare online. Spare is a unified platform for trip scheduling and management which the Transdev Call Center, WeDriveU and the Transit Bureau initially began utilizing on June 2, 2025. The inclusion of payment by debit and/or credit cards is expected to be implemented via Spare by December 31, 2025. This will streamline data flow and support stronger contractual and financial oversight of the STAR program.

The Transit Bureau is committed to fostering a culture of accountability and continuous improvement, and we believe these actions will significantly strengthen contractual oversight, operational performance, and financial integrity.

FINDING 4 – Operational Inefficiencies Due to Underutilized and Misconfigured Scheduling Tools

Criteria

1. Trapeze – Trip Broker:

III. STAR Scheduling¹⁷

The software's scheduling engine shall include the following capabilities and features:

a. Real-time, online interactive scheduling to accommodate and communicate rider cancellations; ride reassignments between vehicles or from taxi dispatch (prior to the ride cancellation window) to dedicated vehicles; and same-day ride assignments real-time.

2. STARontheweb.com:

Trip Service Times and Locations¹⁸

STAR rides are available between 5:30 a.m. and midnight, seven days a week. STAR has no restrictions on trip purpose. All daily trip plans on STAR must begin or end in Arlington. STAR has capacity for a limited number of weekday midday trips (approximately 10:00 AM - 2:30 PM) entirely outside Arlington County within Fare Zone 2 (see STAR Fares). Those rides must be booked at the same time as a trip beginning or ending in Arlington that day

Condition

Trapeze – Trip Broker: The Trip Broker system's real-time scheduling functionality is not fully utilized for managing last-minute trip changes. Although WeDriveU has access to Trip Broker and can view scheduling changes, the system is not used to process these changes directly. Instead, the Transdev Call Center contacts WeDriveU by phone to confirm changes that are already visible in the system. The status of a change is only updated to "scheduled" after the Transdev Call Center receives verbal confirmation from WeDriveU.

STARontheweb.com: The STARontheweb.com platform allows customers to schedule trips that do not conform to program requirements. During testing, the following issues were observed:

- Intra-Zone 2 (within the same jurisdiction) and Inter-Zone 2 (e.g., Washington, DC to Falls Church, VA) trips were permitted outside allowed parameters;
- Zone 3 trips that correctly began or ended in Arlington were rejected, accompanied by the error message: "Trips must be booked to locations within the service area of Arlington STAR."

Cause

Trapeze – Trip Broker: Transdev Call Center staff continue to follow legacy procedures, relying on telephone calls to communicate trip changes to WeDriveU. Transdev and WeDriveU manage all rides scheduling using different applications which results in different challenges when adjusting schedules. Additionally, Transdev and WeDriveU staff have not been trained on the full capabilities of Trip Broker version 18, released in November 2018.

¹⁷ First Transit, Inc., & Arlington County, Virginia. (2021, September 15). Management & operations of the Arlington County Paratransit Call Center Program (Specialized Transit for Arlington Residents [STAR]) [Contract No. 21-DES-RFPLW-295]. Exhibit B, STAR Software Technical Requirements, Section III, STAR Scheduling.

¹⁸ Arlington County. (2024, July). STAR Rider Guide: Policies and Procedures. Trip Service Times and Locations section.

STARontheweb.com: The booking engine is not configured to enforce trip eligibility rules based on time and location. Furthermore, the system lacks clear error messaging for users attempting to schedule valid trips, leading to confusion and improper trip denials.

Effect

Inefficient use of available technology results in increased manual workload, delays in trip updates, and the potential for miscommunication between the Transdev Call Center and transportation providers. Instead of leveraging the Trip Broker system's real-time functionality, staff rely on phone calls to confirm trip changes, reducing the overall efficiency of the scheduling process.

Additionally, the STARontheweb.com platform permits the booking of ineligible trips while rejecting some that meet program criteria. This flaw in the system results in Transdev Call Center staff spending significant time reviewing and canceling trips that should not have been scheduled. As a result, riders may have their expectations set incorrectly, believing their trip is approved, only to be contacted later for cancellation. This creates confusion and dissatisfaction for riders and adversely impacts the program's credibility and reputation. Over time, continued issues of this nature may lead to reduced trust in the reliability and fairness of the STAR service.

Recommendation

For Trip Broker:

- Provide comprehensive training for Call Center and transportation provider staff on the current version of Trip Broker to ensure full utilization of its real-time scheduling features.
- Update internal Transdev Call Center and WeDriveU procedures to reduce reliance on verbal communication and leverage automated scheduling workflows.
- Management should assess the feasibility of requiring the Transdev Call Center and all contracted transportation providers to use one unified application for trip scheduling and management (also recommended in Audit Finding 2).

For STARontheweb.com:

- Reconfigure the booking engine to enforce program requirements, particularly for Zone 2 and Zone 3 trips.
- Implement clear and accurate error messages to guide users in scheduling valid trips that align with service parameters.

Management Response

Management agrees with all of OCA's findings, and Management is committed to improving efficiency, accuracy, and compliance regarding this item. The following actions have been and will be taken to correct and improve STAR:

Trip Broker:

To improve data accuracy, the Transit Bureau reached agreement with WeDriveU and the Transdev Call Center to implement Spare which is a software/app tool that allows for real-time tracking, easier ride scheduling, and allow STAR users to pay using a credit and/or debit card. The inclusion of payment by debit

and/or credit cards, which is not included in the initial June 2, 2025, rollout of Spare, is expected to be implemented by December 31, 2025. Spare is a unified platform for trip scheduling and management which the Transdev Call Center, WeDriveU and the Transit Bureau began initially utilizing on June 2, 2025. Trapeze will no longer be used by the Transdev Call Center after Spare is fully implemented to include payment by debit/or credit cards by December 31, 2025. This will streamline data flow and support stronger contractual and financial oversight of the STAR program.

Training and Utilization:

The Transit Bureau acknowledges the need for enhanced training and will initiate a comprehensive annual training program for Transdev Call Center personnel, WeDriveU, and the Transit Bureau staff within 160 days. In May 2025, the Transit Bureau conducted a training focused on the functionality of Spare with particular emphasis on leveraging real-time scheduling features.

Internal Procedure Updates:

Current internal procedures will be reviewed and revised to minimize reliance on verbal communication. On June 2, 2025, the Transit Bureau began prioritizing the adoption of automated workflows within Spare to reduce manual steps and improve the reliability of scheduling and tracking.

Unified Scheduling Platform Assessment:

The Transit Bureau agrees with the recommendation to evaluate the feasibility of requiring a unified application for trip scheduling and management. Between February – April 2025, the Transit Bureau conducted a comparison analysis with consultation between the Transdev Call Center and WeDriveU to assess the operational means for a unified scheduling platform. As a result of that analysis, Spare was selected as the platform by which the Transit Bureau, Transdev Call Center, and WeDriveU would utilize work from in real time. This allows for more oversight and accountability for the Transit Bureau. The initial rollout of Spare was implemented on June 2, 2025. The Transit Bureau will monitor Spare to enhance the customer experience.

STARontheweb.com Booking Engine:

As a result of the initial implementation of Spare, Spare has replaced STARontheweb.com with <https://spare-rider-arlingtonstar-production.vercel.app/> which offers an online platform which to allow STAR customers to book trips using a web browser rather than the Spare app, locate their vehicle, and pay for trips utilizing debit and/or credit cards. The inclusion of payment by debit and/or credit cards is expected to be implemented via Spare by December 31, 2025.

System Configuration Enhancements:

With the initial implementation of Spare on June 2, 2025, the Transit Bureau has reconfigured the booking engine to strictly enforce program eligibility rules, especially for trips in Zone 2 and Zone 3. Since the initial rollout of Spare, it has helped prevent invalid bookings and ensure compliance with service area limitations.

Error Message Improvements:

The Transit Bureau agrees that clear and instructive error messaging is critical for STAR user experience and compliance. Spare includes the implementation of specific, user-friendly error messages to guide STAR users in scheduling trips that align with program parameters. The initial rollout of Spare was implemented on June 2, 2025.

OBJECTIVES, SCOPE, AND METHODOLOGY

Objectives

To assess the Transit Bureau's effectiveness in managing the STAR program efficiently, in compliance with applicable regulations, and in overseeing the operational performance of contracted service providers—Transdev, WeDriveU, and Red Top Cab Company of Arlington.

Scope

To accomplish the audit objectives, the audit included testing procedures in the following areas for FY 2025:

- Accuracy and completeness of billing and operational data reported by WeDriveU and Red Top.
- Adherence to contractual statements of work and customer service standards by WeDriveU and Red Top.
- Adequacy, functionality, and reliability of Trapeze and other key system applications used to support STAR program operations.
- Transit Bureau's oversight of vendor performance, including monitoring and enforcement responsibilities.
- Operational effectiveness in ensuring driver safety practices and adequate training under vendor management.

Methodology

Each area below was tested to ensure the program is meeting STARS goals of providing safe and reliable paratransit services.

A. Accuracy and completeness of billing and operational data

OCA reviewed a sample of invoices from WeDriveU and Red Top Cab to assess accuracy, completeness, and compliance with contract terms. One invoice from each provider was selected within each contract period to verify billing rates, authorized service usage, and alignment with trip manifest data. Key procedures included:

1. Reviewed Red Top Cab's November 2024 invoice by recalculating metered charges and confirming alignment with invoice totals. Verified a sample of passengers were authorized STAR participants and that trips originated or concluded within Arlington.
2. Evaluated WeDriveU's November invoice for compliance with contract terms. Recalculated revenue and service hours, and verified that maintenance, administrative, and insurance fees matched contracted rates.
3. Assessed WeDriveU's December invoice to ensure billed trips adhered to contract rates and were supported by complete and accurate trip data.
4. Verified November and December trip manifest data for WeDriveU against service hour reports, confirming that all transported passengers were authorized STAR participants.
5. Reviewed WeDriveU's Service Quality Standards Index for December through February to assess compliance with contractual performance benchmarks and related deductions.

B. Adherence to customer service standards and ease of program use

Reviewed the STAR Rider Guide to assess whether it provides clear, accurate, and helpful instructions for program enrollment. Tested the functionality of the STAR website's complaint and compliment submission feature to verify that entries are successfully captured in the customer information system and responses are sent in a timely manner. Additionally, performed an analysis of historical complaint and compliment data to identify trends and potential areas for service and STAR program improvement.

C. Adequacy of system applications to support program execution

Evaluated the functionality and reliability of key STAR software applications used to schedule and manage participant rides, ensuring alignment with the STAR Rider Guide and support for efficient, customer-focused service delivery. Verified that passenger-facing applications comply with Section 508 accessibility standards and ADA requirements. Reviewed system integration procedures to confirm that data exchanges between applications are supported by effective processes to ensure timely processing and verification of data.

D. Transit Bureau oversight of Transdev and WeDriveU

Reviewed the Transit Bureau's oversight practices to evaluate how it monitors key program objectives, including safety, ADA compliance, service reliability, and customer service. Assessed whether these oversight activities are effective in ensuring contractor compliance with established contract requirements.

E. Operational effectiveness over safety and driver training

Obtained and reviewed WeDriveU's operational manuals and driver training curriculum to assess whether they address key areas, including safe driving practices, professional conduct standards, accident and incident reporting procedures, ADA compliance, and drug and alcohol training requirements. For drivers who provided service in December 2024, reviewed training records to verify completion of training consistent with the operational manual and curriculum.

ABOUT US

Compliance Statement

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

Authority

The County Auditor is appointed by the Arlington County Board under the authority of § 15.2-709.2 of the Code of Virginia, 1950, as amended. The County Auditor initiated this audit as part of the FY 2025 Annual Audit Work Plan approved by County Board on October 22, 2024.

County Auditor

Wayne M. Scott, CIA, CISA, County Auditor

The County Auditor reports to the County Board, independent of management, and is charged with conducting performance audits of departments, offices, boards, commissions, activities, and programs of Arlington County that directly or indirectly report, or are accountable, to the County Board. Performance audits encompass a variety of scopes and objectives, including effectiveness and efficiency, economy, transparency, internal controls, and compliance.

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