



# Audit of Driver License Monitoring Program

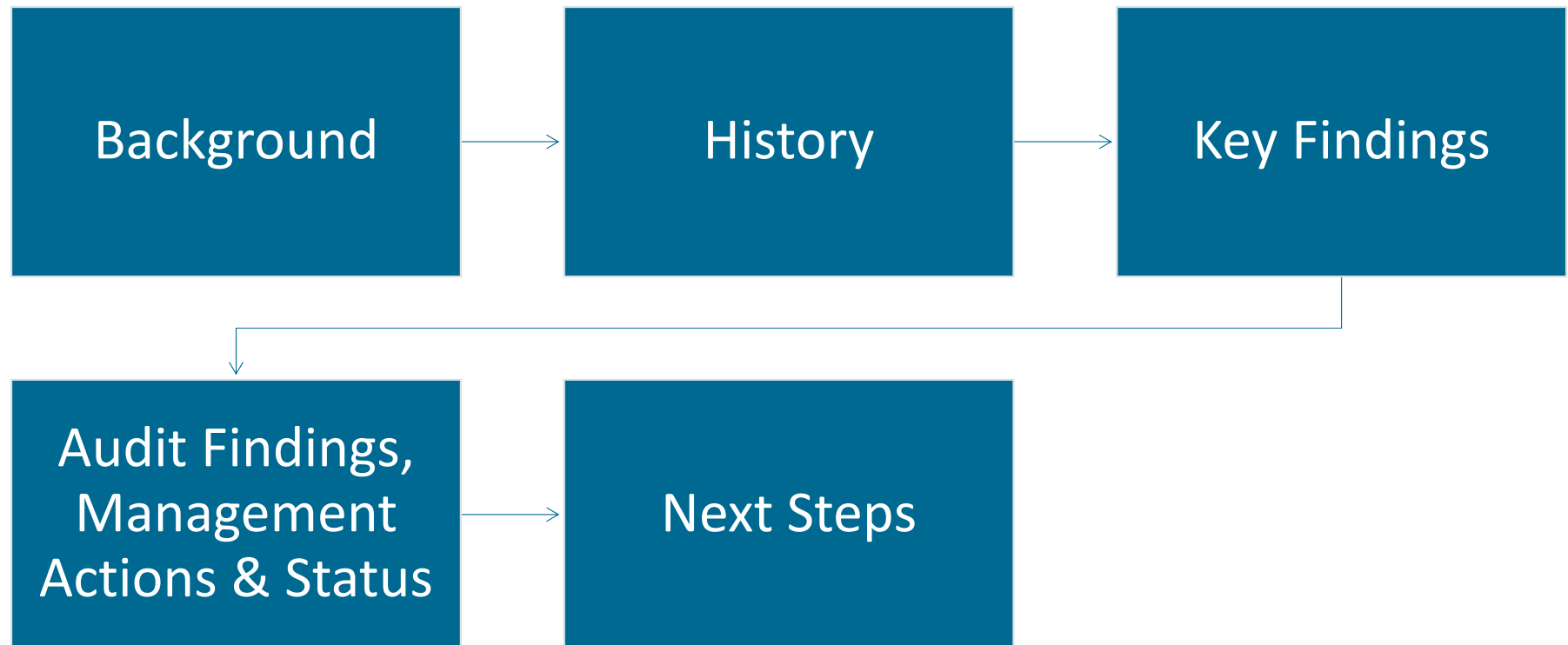
February 2026



INTERNAL AUDIT  
DIVISION



# Agenda



# Background

- Chief Safety Officer requested an audit of the District's Driver License Monitoring Program (DLMP) as part of Internal Audit's Annual Plan.
- District's Operations Rules and Procedures Manual states, "District motor vehicles shall not be operated by personnel without the required license."
- California Vehicle Code §1808.1 requires the District to participate in the Department of Motor Vehicles' (DMV) Employer Pull-Notice Program (EPN Program).
- Employers must enroll Class A commercial license, a Class B commercial license, and select Class C non-commercial licenses that are required to perform work.
- Maintenance Department is District's designated EPN Program Administrator. EPN software monitors enrolled drivers' DMV records and reports to the Administrator.
- EPN "driver report" shows employees without a valid license for various reasons (license suspension, revocation, etc.), and those drivers are not allowed to drive District vehicles.
- At the time of the audit in 2020, there were 257 active employees in the EPN Program for a little over 500 District vehicles driven on public roads.

# History

- Audit was completed in 2020.
- Implementation of audit recommendations delayed due to:
  - COVID 19 (District focused on addressing maintenance backlog with available staff).
  - District Retirement Incentive Program (80% of Internal Audit staff participated).
  - Available resources in Maintenance Department (now has a dedicated Fleet Manager) and OCIO (has now interfaced EPN Program with PeopleSoft HR module).
  - Changes in state law GC12940 in 2022 (required additional reviews of driving as an essential function of positions).

# Key Findings

Finding	Finding Description	Recommendation(s) Count
<b>I</b> - No Written Procedures	Develop reliable, available, consistent formal rules	1
<b>II</b> - EPN Program Does Not Include All Employees	ID all employees who drive and ensure inclusion to EPN	1
<b>III</b> - EPN Program Update Process Does Not Include All Departments And Employees	Expand EPN to all Departments and include department needs in developing written procedures	4
<b>IV</b> - Vehicles Driven On Public Roads Not Controlled By EPN Program	Establish department reporting and educate departments on EPN restrictions & requirements	2
<b>V</b> - Improvements To Administration Of EPN Program	Automate and expand the required systems between HR, EPN, and monitoring standards for authorized drivers.	6
	<b>Total:</b>	<b>14</b>

# I. Audit Findings, Management Actions & Status

#	Findings	Recommendations	Management Action Plans	Status
I.	<p><b>No written procedures to prescribe the responsibilities and controls needed to ensure that the EPN Program achieves the District's objectives.</b></p> <p><u>Note:</u> In 2020, EPN Program only applied to Operations staff and limited OCIO staff.</p> <p>Only 257 employees included in the EPN Program, while the District had over 500 motor vehicles that could be driven on a public road.</p> <p>Sample data showed that only 27% of employees who likely should have been in the EPN Program were registered.</p>	<p>1. Develop written procedures to establish the controls and processes needed to ensure only employees with valid driver's licenses drive District vehicles on public roads.</p>	<p>New <b>Vehicle Use Policy</b> ('Policy') developed internally that revised, modernized, ratified, and issued (previous Management Procedure from 1980). HR sent EPN Notice letters to required employees; policy was announced District-wide.</p> <p><b>Policy issued</b> on July 1, 2025 to ensure all employees had time to enter Driver License (DL) information and complete the required training.</p> <p><b>Policy provides detailed guidance</b> about DL enrollment and requirements for employees required to operate a District vehicle, and those employees who need to operate a District vehicle for official use. Policy explains the EPN program along with requirements, including training and DL registration with HR.</p>	Implemented



## II. Audit Findings, Management Actions & Status

#	Findings	Recommendations	Management Action Plans	Status
II.	<p><b>EPN Program does not include all employees that drive District vehicles on public roads.</b></p> <p><u>Note:</u> In 2020, EPN Program only applied to Operations staff and limited OCIO staff.</p>	<p>2) Identify all employees that drive the approximately 500 District vehicles on public roads and ensure the EPN Program includes these drivers.</p>	<p>HR <b>identified all employees</b> required to operate District vehicles based on their job descriptions. Notices issued via District Announcements.</p> <p>OCIO <b>developed interface</b> between EPN and HR system to allow the two systems to communicate and reconcile employees being monitored.</p> <p>To <b>reserve a vehicle</b>, casual drivers are required to complete mandatory driving training and be registered in EPN before given access to a vehicle (<i>this management action goes beyond the original audit recommendation</i>).</p> <p>Installed <b>BART HQ secure Key Management</b> system that only provides access to BART vehicles to drivers who have completed mandatory training and are in the EPN Program.</p>	Implemented

# III. Audit Findings, Management Actions & Status

#	Findings	Recommendations	Management Action Plans	Status
III.	<p><b>Process for updating EPN Program does not include all departments and employees.</b></p> <p><u>Note:</u> In 2020, EPN Program only applied to Operations staff and limited OCIO staff.</p> <p>Revised EPN Program applies to all BART staff who are required to drive or desire to drive a District vehicle.</p> <p>Revised EPN Program applies to over 1,200 employees for over 700 vehicles.</p>	<p>3) Send requests for a driver list to the 25 departments that were not included in the EPN.</p> <p>4) Follow up with the 16 departments that did not respond to the EPN administrator.</p> <p>5) Follow up with the two departments that partially responded to the EPN administrator's request.</p> <p>6) Include information gathering and department response requirements in written procedures.</p>	<p>Updated <b>new employee onboarding</b> process includes HR system to formally track positions that are required to operate a District Vehicle.</p> <p>Staff will <b>automatically be enrolled/removed</b> or archived in EPN Program via HR records.</p>	Implemented



## IV. Audit Findings, Management Actions & Status

#	Findings	Recommendations	Management Action Plans	Status
IV.	Departments are not restricting the use of District motor vehicles on public roads to only employees tracked in the EPN Program.	<p>7) Provide periodic reports to departments identifying which of their employees are or should be included in the EPN Program.</p> <p>8) Instruct departments to restrict the use of District motor vehicles on public roads to only those employees in the EPN Program.</p>	<p>New <b>Policy is active</b>. Revisions to both EPN and HR systems are complete, and the EPN Program no longer depends on department managers to provide data.</p> <p><b>HR System and EPN Program are directly linked</b>, and HR will activate periodic validation reports that identify who is monitored.</p> <p>Labor and HR are fully vetted on <b>corrective action</b> should a staff member become non-compliant.</p>	Implemented

## V. Audit Findings, Management Actions & Status (1/2)

#	Findings	Recommendations	Management Action Plans	Status
V.	<b>The efficiency and effectiveness of EPN program administration needs improvement.</b>	<p>9) Enter employee numbers in the EPN system.</p> <p>10) Enter the employee's cost center in the EPN system.</p> <p>11) Delete the existing terminated and other former employees.</p>	<p><b>EPN system has been updated to connect directly with HR system</b>, including employee numbers and required Driver License numbers. All commercial Class A and B license holders are identified, and Class C that has operational demand.</p> <p><b>Cost Center and job classification</b> are part of standardized onboarding information gathering and are required fields in EPN registration.</p> <p><b>HR system's Driver License Module</b> is in place; terminated employees are automatically removed from EPN.</p>	Implemented

## V. Audit Findings, Management Actions & Status (2/2)

#	Findings	Recommendations	Management Action Plans	Status
V.	<b>The efficiency and effectiveness of EPN program administration needs improvement.</b>	<p>12) Maintain records of the EPN system's Exception Reports.</p> <p>13) Maintain a contact list of departments responsible for District motor vehicles driven.</p> <p>14) Provide management with a complete list of all employees in the department when requesting a list of employees who drive District vehicles on public roads.</p>	<p>BART has <b>reconciled the list of employees</b> and has developed periodic EPN monitoring reports.</p> <p>Manual <b>process of keeping the files</b> for a year is in place; electronic records will be kept after first year.</p> <p>Physically secure Key Management system has been installed in BART HQ. <b>Casual drivers must complete driving training</b> for access.</p>	Implemented

# Next Steps

- DLMP has the necessary components for the implementation of Management's Action Plans.
- Management retains the responsibility for managing the risk and operations of the DLMP.
- Internal Audit considers this report in the **final closing**, pending the noted classification of job descriptions per GC12940.
  - HR is finalizing, directly with the AGMs, the review of the necessity of the legacy requirements of DL for select positions.
- Internal Audit may return to perform future follow-up audit testing to validate the final implementation and may also return for additional confirmation testing of the EPN Program.



Questions?

