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To: Members of the Wisconsin Legislature

Re: 2007 Cost-efficiency Analysis for Wisconsin's Public Transit Systems

The Wisconsin Department of Transportation is required to have cost-efficiency standards for Wisconsin transit systems, as specified by statute and administrative rule. The language contained in Administrative Rule TRANS 4 states:

"The department shall assess the performance of each transit system receiving aid under the {state operating assistance} program on an annual basis, using the six performance indicators defined in sub. (2) . . ."

The six performance indicators are: passengers/capita, expense/passenger, expense/revenue hour, passengers/revenue hour, revenue hours/capita, and operating ratio (revenue/expense ratio). The cost-efficiency standards implementation plan (attached) discusses in greater depth the process and methodology for determining transit system compliance.

The preliminary results of this analysis show that 66 of Wisconsin's 69 transit systems are in compliance with the cost-efficiency standards. Further analysis is underway for three transit systems; New Richmond (Shared Ride Taxi), Plover (Shared Ride Taxi), and Waterloo/Marshall (Shared Ride Taxi) whose stage 1 & 2 analyses indicate a need for further evaluation.

The process of analysis follows a tiered methodology (attached). Transit systems are divided into six peer groups based on commonality of operating system characteristics. The first stage of analysis involves peer group comparisons by system type. To be judged in compliance at this stage, a transit system must meet or exceed the performance standard for four of the six performance measures.

Five shared ride taxi transit systems (New Richmond, Ozaukee Co., Plover, Washington Co. and Waterloo/Marshall) were found to be out of compliance with three or more of the six performance measures after this step. A detailed chart of the step one analysis is attached.

For transit systems not meeting the cost-efficiency standards at step one, a second stage of analysis is prescribed. The step two analysis involves a time-trend review over a five-year period. When a system shows improvement over those five years in enough measures so that the number totals at least four of the six indicators, then that system is deemed to be in compliance.

After performing the second step of the analysis, three transit systems will need a third step evaluation (New Richmond, Plover, and Waterloo/Marshall). A detailed matrix of the step two analysis is also attached.

A third tier analysis assesses the implementation status of recommendations made in the transit system's most recently completed management performance audit. A third tier analysis for New Richmond, Plover, and Waterloo/Marshall could not be conducted, as management performance audits have not traditionally been performed for Shared Ride Taxis. Therefore, Wisconsin DOT will now conduct a management performance audit of these systems to begin the third tier analysis process. New Richmond, Plover, and Waterloo/Marshall will not be deemed to be in compliance until the performance review has been completed and recommendations for improvement are available.

In viewing the detailed data sheets, it is useful to note that the analyses for Milwaukee County, Madison, and the medium-sized bus systems use an external peer group. The data is drawn from the National Transit Database for the year 2004. Since comparable national transit data for small-sized transit systems is not available, the analyses for the small bus group, commuter bus group, and shared-ride taxi group use the statewide peer group itself for comparison. This group primarily uses 2004 actual data, as reported in each system's 2006 annual application for state aid.

Since CY 2004 data is used, this analysis does not reflect decisions made locally beyond 2004 to improve performance. If available, this information will be included in the completed management performance audits for New Richmond, Plover, and Waterloo/Marshall.

If you have any questions about these standards or the analysis, please contact me at 608-266-0189.

Sincerely,



John Alley, Chief
Public and Specialized Transit Section

Enclosures

cc: Transit Systems

COST EFFICIENCY STANDARDS IMPLEMENTATION PLAN

BACKGROUND

1. Cost efficiency standards will be established for each of the following performance indicators:
 - A. The ratio of passengers, as expressed in unlinked trips, to service area population.
 - B. The ratio of operating expenses to passengers, as expressed in unlinked trips.
 - C. The ratio of operating expenses to revenue hours.
 - D. The ratio of revenues to operating expenses.
 - E. The ratio of passengers, as expressed in unlinked trips, to revenue hours.
 - F. The ratio of revenue hours to service area population.
2. For purposes of establishing cost efficiency standards, transit systems are divided into the following peer groups:
 1. Milwaukee
 2. Madison
 3. Medium Bus Systems
 4. Small Bus Systems
 5. Commuter Bus Systems
 6. Shared-Ride Taxi Systems

STEP 1

Prepare tables for each of the performance indicators for each of the peer groups.

For the Milwaukee, Madison, and the Medium Bus Systems, peer groups of similar sized transit systems with similar operating characteristics external to the state will be developed to establish the cost efficiency standards. For each of these groups, the transit systems used to establish the peer group will be those used in the most recent management performance audit. Data used for these transit systems will be the most recent available from the National Transit Database.

For Small Bus, Commuter Bus, and Shared-Ride Taxi systems, standards shall be established using data from only in-state systems. Data used shall be from the most recently audit calendar year.

For all peer groups, standards will be established for each of the six performance indicators by using a standard deviation. Systems that are within one standard deviation of the arithmetic mean shall be judged as in compliance with the standard for the

measure. Systems that meet the standards for 4 of the 6 performance measures shall be deemed in compliance with the cost-efficiency standards.

STEP 2

For those systems not in compliance with the cost efficiency standard after completion of Step 1, prepare tables showing a time-trend analysis of each of the six performance measures over the most recent five-year period. Systems showing improvement in measures in which they did not meet the standards in Step 1 will be deemed in compliance with the cost efficiency standards if when added to the number of measures they were in compliance with in Step 1 the total is 4 or more.

STEP 3

For those systems still not in compliance after completion of Steps 1 and 2, assess the implementation status of recommendations made in the system's most recently completed management performance audit. A system that has made significant progress in implementing the majority of recommendations targeted at improving efficiency shall be deemed in compliance with the cost efficiency standards. At this time, WISDOT shall notify all transit systems of their status relative to compliance with the cost efficiency standards.

STEP 4

If any transit systems remain out of compliance after completion of Steps 1 through 3, one of the following actions will be taken:

- A. If management performance audit recommendations have not been implemented, WISDOT shall provide technical assistance to aid in the implementation of the recommendations. If consultant services are necessary, the transit system shall pay the nonfederal share of the costs.
- B. If a management performance audit has not been conducted within the last three years, WISDOT shall schedule an audit as soon as possible.

PENALTY

Systems deemed out of compliance with the cost efficiency standards as outlined above will be given a three-year period of time in which to comply before being assessed a revenue penalty. After three years of non-compliance, a 10% revenue penalty shall be imposed, which will limit state aids to 90% of the state aid the system would have been entitled to if it were in compliance. The penalty remains in effect until the system comes into compliance.

**PERFORMANCE STANDARDS
MEDIUM BUS AND EXTERNAL PEER GROUP SUMMARY**

Performance Measure	Data	Mean	Standard Deviation
Cost/Hour	2004	\$61.76	\$11.79
Operating Ratio	2004	20.30%	9.64%
Cost/Passenger	2004	\$3.81	\$1.50
Passenger/Hour	2004	17.58	5.39
Passenger/Capita	2004	10.40	5.36
Hours/Capita	2004	0.58	0.20

Performance Parameters

+/- One Standard Deviation

\$49.97	\$73.56
10.66%	29.94%
\$2.31	\$5.31
12.19	22.98
5.03	15.76
0.38	0.78

*Shading below indicates system's performance outside of the standard deviation

Medium Bus	Cost/ Revenue Hour	Operating Ratio	Cost/ Passenger	Passengers/ Revenue Hour	Passengers/ Capita	Revenue Hours/ Capita		
Appleton-Valley Transit	\$ 63.55	13.58%	\$ 4.47	14.23	5.37	0.38	Wisconsin Medium Bus Group	
Beloit-BTS	\$ 72.70	17.66%	\$ 4.94	14.72	5.09	0.35		
Eau Claire-ECTS	\$ 56.99	24.00%	\$ 2.51	22.70	11.69	0.51		
Green Bay-GBT	\$ 56.45	16.17%	\$ 2.94	19.22	8.91	0.46		
Janesville-JTS	\$ 66.77	17.33%	\$ 4.13	16.16	7.71	0.48		
Kenosha-KT	\$ 70.33	10.90%	\$ 3.28	21.44	14.34	0.67		
LaCrosse Municipal Transit	\$ 57.89	11.68%	\$ 3.40	17.02	11.28	0.66		
Oshkosh-OTS	\$ 57.72	12.81%	\$ 2.52	22.88	12.82	0.56		
Racine-Belle Urban System	\$ 59.21	19.94%	\$ 3.91	15.14	11.42	0.75		
Sheboygan-STS	\$ 53.69	20.15%	\$ 5.56	9.65	7.29	0.76		
Waukesha - WTC	\$ 58.61	19.17%	\$ 4.89	12.00	11.26	0.94		
Wausau - WATS	\$ 63.98	14.95%	\$ 3.40	18.83	11.12	0.59		
Greely-The Bus	\$ 53.28	20.53%	\$ 3.68	16.51	9.28	0.59		National Peer Group
Dubuque - City of	\$ 63.28	21.25%	\$ 2.78	14.49	4.30	0.30		
Iowa City Transit	\$ 64.66	27.82%	\$ 2.06	22.75	8.28	0.36		
Waterloo MET	\$ 53.39	37.80%	\$ 5.25	31.35	17.72	0.57		
Boise Urban Stages	\$ 69.87	12.61%	\$ 5.90	10.16	3.10	0.30		
Decatur-DPTS	\$ 44.92	13.11%	\$ 3.39	11.85	3.94	0.33		
Bloomington-BPT	\$ 43.96	29.62%	\$ 1.78	13.24	9.98	0.75		
Evansville-METS	\$ 47.45	20.38%	\$ 3.39	24.70	21.92	0.89		
Muncie-MITS	\$ 56.48	5.38%	\$ 2.89	14.00	6.33	0.45		
Pittsfield - BRTA	\$ 90.31	17.37%	\$ 8.34	19.55	16.67	0.85		
Battle Creek-BCT	\$ 78.05	14.50%	\$ 4.69	10.83	8.60	0.79		
Bay City-BMTA	\$ 70.08	23.39%	\$ 7.92	16.63	6.61	0.40		
Jackson-JTA	\$ 48.82	30.75%	\$ 2.70	8.84	6.07	0.69		
Kalamazoo-KMTS	\$ 71.02	13.30%	\$ 3.16	18.08	5.61	0.31		
Muskegon Area Transit	\$ 58.46	13.89%	\$ 5.03	22.48	15.27	0.68		
St. Cloud - SCMT	\$ 50.88	26.92%	\$ 2.27	11.62	2.65	0.23		
Springfield-SU	\$ 56.90	14.61%	\$ 3.04	22.41	18.35	0.82		
Missoula-MUT	\$ 55.09	19.60%	\$ 3.28	18.73	6.50	0.35		
Broome County	\$ 59.92	28.84%	\$ 2.75	16.81	9.76	0.58		
Utica-UTA	\$ 48.61	30.70%	\$ 3.26	21.81	16.11	0.74		
Salem-SAMTD	\$ 84.68	13.58%	\$ 2.82	14.92	9.75	0.65		
Erie-EMTA	\$ 60.57	58.70%	\$ 3.10	30.06	25.82	0.86		
Bellingham-WTA	\$ 93.13	17.52%	\$ 2.69	19.55	12.93	0.66		
GROUP MEAN AVERAGE:	\$61.76	20.30%	\$3.81	17.58	10.40	0.58		

**PERFORMANCE STANDARDS
SMALL BUS PEER GROUP SUMMARY**

Performance Measure	Data	Mean	Standard Deviation
Cost/Hour	2004	\$50.62	\$9.25
Operating Ratio	2004	12.30%	4.50%
Cost/Passenger	2004	\$9.51	\$3.09
Passenger/Hour	2004	6.09	3.13
Passenger/Capita	2004	4.39	2.28
Hours/Capita	2004	0.76	0.39

Performance Parameters

+/- One Standard Deviation

\$41.37	\$59.87
7.80%	16.80%
\$6.42	\$12.60
2.97	9.22
2.10	6.67
0.37	1.15

*Shading below indicates system's performance outside of the standard deviation

Small Bus	Cost/ Revenue Hour	Operating Ratio	Cost/ Passenger	Passengers/ Revenue Hour	Passengers/ Capita	Revenue Hours/ Capita
Bay Area Rural	\$ 47.75	10.63%	\$12.16	3.93	1.29	0.33
Fond du Lac	\$ 44.58	15.16%	\$8.45	5.28	3.64	0.69
Ladysmith	\$ 37.83	10.75%	\$8.60	4.40	7.22	1.64
Manitowoc	\$ 65.02	11.25%	\$6.03	10.78	5.86	0.54
Merrill	\$ 63.18	19.90%	\$5.68	11.13	7.34	0.66
Monona	\$ 45.89	14.22%	\$12.95	3.54	2.06	0.58
Rice Lake	\$ 49.04	4.19%	\$13.77	3.56	2.99	0.84
Stevens Point	\$ 51.69	12.33%	\$8.43	6.13	4.68	0.76
GROUP MEAN AVERAGE:	\$ 50.62	12.30%	\$9.51	6.09	4.39	0.76

PERFORMANCE STANDARDS
SHARED RIDE TAXI PEER GROUP SUMMARY

Performance Measure	Data	Mean	Standard Deviation
Cost/Hour	2004	\$22.34	\$4.33
Operating Ratio	2004	28.18%	8.16%
Cost/Passenger	2004	\$8.24	\$2.63
Passenger/Hour	2004	2.92	0.88
Passenger/Capita	2004	3.93	2.67
Hours/Capita	2004	1.33	0.94

Performance Parameters
+/- One Standard Deviation

\$18.01	\$26.67
20.02%	36.35%
\$5.61	\$10.87
2.04	3.80
1.26	6.60
0.39	2.28

*Shading below indicates system's performance outside of the standard deviation

Shared-Ride Taxi	Cost/ Revenue Hour	Operating Ratio	Cost/ Passenger	Passengers/ Revenue Hour	Passengers/ Capita	Revenue Hours/ Capita
Baraboo	\$20.45	49.17%	\$6.38	3.20	3.60	1.12
Beaver Dam	\$19.44	31.70%	\$6.30	3.09	6.92	2.24
Berlin	\$25.81	23.60%	\$7.22	3.58	4.90	1.37
Black River Falls	\$29.75	31.72%	\$7.72	3.86	9.44	2.45
Chippewa Falls	\$22.58	30.46%	\$5.29	4.27	5.09	1.19
Clintonville	\$24.29	30.09%	\$10.37	2.34	2.10	0.90
Edgerton	\$16.39	21.98%	\$9.57	1.71	0.97	0.56
Fort Atkinson	\$20.61	32.50%	\$5.33	3.87	4.41	1.14
Grant Co.	\$24.67	12.35%	\$8.19	3.01	1.38	0.46
Hartford	\$32.02	34.90%	\$7.42	4.31	1.87	0.43
Jefferson	\$20.01	29.84%	\$6.41	3.12	2.89	0.93
Lake Mills	\$19.55	19.27%	\$9.06	2.16	1.73	0.80
Marinette	\$28.81	22.02%	\$7.85	3.67	3.13	0.85
Marshfield	\$20.34	32.84%	\$5.85	3.48	4.31	1.24
Mauston	\$29.76	26.89%	\$9.77	3.05	5.34	1.75
Medford	\$17.82	23.30%	\$7.16	2.49	3.44	1.38
Monroe	\$18.09	34.71%	\$4.95	3.65	4.91	1.34
Neillsville	\$19.68	22.78%	\$9.68	2.03	5.70	2.81
New Richmond	\$28.61	15.00%	\$15.31	1.87	1.54	0.83
Onalaska	\$25.20	22.00%	\$10.18	2.48	1.67	0.67
Ozaukee Co.	\$21.57	21.78%	\$11.67	1.85	0.85	0.46
Platteville	\$16.21	26.58%	\$7.93	2.05	1.90	0.93
Plover	\$19.42	23.95%	\$12.32	1.58	1.12	0.71
Port Washington	\$26.61	24.53%	\$9.46	2.81	1.93	0.69
Portage	\$26.89	40.73%	\$8.23	3.27	11.14	3.41
Prairie Du Chien	\$20.85	26.07%	\$7.62	2.74	4.69	1.71
Prairie Du Sac	\$16.19	27.19%	\$7.70	2.10	10.32	4.91
Reedsburg	\$27.62	29.59%	\$8.36	3.30	4.12	1.25
Rhineland	\$17.67	42.52%	\$6.90	2.56	8.81	3.44
Ripon	\$18.88	27.78%	\$6.91	2.73	4.31	1.58
River Falls	\$27.98	18.73%	\$10.18	2.75	1.84	0.67
Shawano	\$19.14	46.06%	\$5.83	3.28	3.48	1.06
Stoughton	\$28.66	35.32%	\$5.84	4.91	2.78	0.57
Sun Prairie	\$22.46	37.87%	\$5.07	4.43	4.11	0.93
Viroqua	\$22.78	24.49%	\$6.66	3.42	7.57	2.21
Washington County	\$24.37	14.90%	\$15.73	1.55	0.60	0.38
Waterloo/Marshall	\$16.79	14.63%	\$14.69	1.14	0.51	0.44
Watertown	\$20.87	35.62%	\$5.10	4.09	5.70	1.39
Waupaca	\$23.08	33.61%	\$6.52	3.54	6.65	1.88
Waupun	\$15.75	23.11%	\$8.02	1.96	0.89	0.45
West Bend	\$22.01	30.17%	\$6.49	3.39	4.63	1.36
Whitewater	\$19.60	28.02%	\$7.45	2.63	1.47	0.56
Wis Rapids	\$21.18	31.59%	\$9.57	2.21	4.24	1.91
GROUP MEAN AVERAGE:	\$22.34	28.18%	\$8.24	2.92	3.93	1.33

**PERFORMANCE STANDARDS
MILWAUKEE CO AND EXTERNAL PEER GROUP SUMMARY**

Performance Measure	Data	Mean	Standard Deviation
Cost/Hour	2004	\$85.58	\$13.76
Operating Ratio	2004	25.34%	7.49%
Cost/Passenger	2004	\$3.54	\$0.75
Passenger/Hour	2004	24.77	4.88
Passenger/Capita	2004	19.97	10.61
Hours/Capita	2004	0.79	0.36

Performance Parameters

+/- One Standard Deviation

\$71.82	\$99.34
17.85%	32.83%
\$2.79	\$4.29
19.89	29.65
9.36	30.58
0.42	1.15

*Shading below indicates system's performance outside of the standard deviation

	Cost/ Revenue Hour	Operating Ratio	Cost/ Passenger	Passengers/ Revenue Hour	Passengers/ Capita	Revenue Hours/ Capita
MCTS Peer Group						
Milwaukee-County	\$84.71	34.85%	\$2.26	37.53	41.06	1.09
Oakland-ACCTD	\$108.40	23.00%	\$3.49	31.09	20.03	0.64
Denver-RTD	\$72.27	29.80%	\$3.10	23.32	35.94	1.54
Indianapolis-IPT	\$66.30	30.69%	\$3.43	19.31	7.36	0.38
Louisville-TARC	\$67.88	14.79%	\$2.80	24.22	17.57	0.73
Detroit-D-DOT	\$104.86	13.39%	\$5.30	19.80	8.84	0.45
Minneapolis-St. Paul-MT	\$96.80	30.71%	\$3.45	28.07	22.59	0.80
Kansas City-KCATA	\$88.92	14.24%	\$3.82	23.27	9.50	0.41
St. Louis-Bi-State	\$77.60	33.08%	\$3.64	21.33	14.60	0.68
Cincinnati-SORTA	\$67.47	33.32%	\$2.75	24.56	15.33	0.62
Cleveland-RTA	\$87.77	24.40%	\$3.36	26.13	26.66	1.02
Columbus-COTA	\$91.89	19.41%	\$4.51	20.35	12.83	0.63
Pittsburgh-PAA	\$86.05	29.39%	\$3.76	22.90	33.25	1.45
Providence-RIPTA	\$97.15	23.67%	\$3.90	24.88	14.00	0.56
GROUP MEAN AVERAGE:	\$85.58	25.34%	\$3.54	24.77	19.97	0.79

National Peer Group

**PERFORMANCE STANDARDS
MADISON METRO AND EXTERNAL PEER GROUP SUMMARY**

Performance Measure	Data	Mean	Standard Deviation
Cost/Hour	2004	\$75.17	\$11.76
Operating Ratio	2004	28.59%	7.41%
Cost/Passenger	2004	\$3.58	\$0.52
Passenger/Hour	2004	21.45	4.73
Passenger/Capita	2004	15.78	8.34
Hours/Capita	2004	0.71	0.30

Performance Parameters

+/- One Standard Deviation

\$63.41	\$86.92
21.18%	36.00%
\$3.06	\$4.11
16.72	26.18
7.44	24.11
0.42	1.01

*Shading below indicates system's performance outside of the standard deviation

Madison Metro Peer Group	Cost/ Revenue Hour	Operating Ratio	Cost/ Passenger	Passengers/ Revenue Hour	Passengers/ Capita	Revenue Hours/ Capita
Madison-MMT	\$78.34	21.74%	\$2.89	27.06	33.27	1.23
Hartford-CT Transit	\$71.12	30.37%	\$2.85	24.94	15.02	0.60
Indianapolis-IPT	\$66.30	30.69%	\$3.43	19.31	7.36	0.38
Omaha-OTA	\$52.28	25.69%	\$3.68	14.21	7.16	0.50
Albany-CDTA	\$71.48	32.89%	\$3.58	19.96	20.79	1.04
Rochester-RGRTA	\$80.30	41.80%	\$3.43	23.38	18.21	0.78
Syracuse-CNY Centro	\$87.44	26.02%	\$2.97	29.39	23.62	0.80
Dayton-MVRTA	\$81.21	24.44%	\$3.87	20.96	11.60	0.55
Toledo - TARTA	\$63.33	23.50%	\$4.55	13.93	10.04	0.72
Providence-RIPTA	\$97.15	23.67%	\$3.90	24.88	14.00	0.56
Spokane-STA	\$72.21	19.70%	\$3.53	20.45	23.12	1.13
Tacoma-Pierce Transit	\$80.84	42.54%	\$4.28	18.91	5.16	0.27
GROUP MEAN AVERAGE:	\$75.17	28.59%	\$3.58	21.45	15.78	0.71

National Peer Group

**PERFORMANCE STANDARDS
COMMUTER BUS PEER GROUP SUMMARY**

Performance Measure	Data	Mean	Standard Deviation
Cost/Hour	2004	\$102.87	\$20.20
Operating Ratio	2004	21.74%	1.16%
Cost/Passenger	2004	\$9.80	\$2.36
Passenger/Hour	2004	10.82	2.71
Passenger/Capita	2004	0.89	0.49
Hours/Capita	2004	0.08	0.03

Performance Parameters

+/- One Standard Deviation

\$82.67	\$123.06
20.58%	22.90%
\$7.44	\$12.16
8.12	13.53
0.41	1.38
0.05	0.11

*Shading below indicates system's performance outside of the standard deviation

Commuter Bus	Cost/ Revenue Hour	Operating Ratio	Cost/ Passenger	Passengers/ Revenue Hour	Passengers/ Capita	Revenue Hours/ Capita
Ozaukee Co.	\$129.46	20.86%	\$9.35	13.85	1.14	0.08
Racine Com.	\$106.38	22.73%	\$13.12	8.11	0.41	0.05
Washington Co.	\$82.77	20.62%	\$9.18	9.02	0.56	0.06
Waukesha Co.	\$92.86	22.74%	\$7.55	12.31	1.45	0.12
GROUP MEAN AVERAGE:	\$102.87	21.74%	\$9.80	10.82	0.89	0.08

SUMMARY RESULTS
STEP ONE ANALYSIS

The following five transit systems failed to meet the performance standards in three or more performance measures. Compliance, at this stage, is defined as meeting the standard in four of the six cost efficiency measures.

Shared Ride Taxi Group						
	Cost/Revenue Hour	Operating Ratio	Cost/Passenger	Passengers/Revenue Hour	Passengers/Capita	Revenue Hours/Capita
New Richmond	X	X	X	X		
Ozaukee Co.			X	X	X	
Plover			X	X	X	
Washington Co.		X	X	X	X	X
Waterloo/Marshall		X	X	X	X	

“X” indicates failure to meet performance standard in the step one analysis

Summary Results for Step Two Analysis

Performance Over Past 5 Years (2000-2004)/Five-Year Trend Analysis

	Expense/Revenue Hour	Operating Ratio	Cost/Passenger	Passengers/Revenue Hour	Passengers/Capita	Revenue Hours/Capita	Number of areas out of compliance	Number of areas out of compliance that show improvement	Final number of areas out of compliance	System pass/fail
New Richmond	No Improvement	No Improvement	No Improvement	Improvement	In Compliance	In Compliance	4	1	3	Fail
Ozaukee Co.	In Compliance	In Compliance	Improvement	Improvement	Improvement	In Compliance	3	3	0	Pass
Plover	In Compliance	In Compliance	No Improvement	No Improvement	No Improvement	In Compliance	3	0	3	Fail
Washington Co.	In Compliance	Improvement	Improvement	Improvement	Improvement	No Improvement	5	4	1	Pass
Waterloo/Marshall	In Compliance	Improvement	No Improvement	No Improvement	No Improvement	In Compliance	4	1	3	Fail

Shading indicates areas where system was out of compliance after Step 1 analysis.