



Tri-County Metropolitan Transportation District of Oregon

**Federal Awards Reports in Accordance with the Uniform Guidance
For the Year Ended June 30, 2025**

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**Independent Auditor's Report on Internal Control over Financial Reporting and on Compliance and
Other Matters Based on an Audit of Financial Statements Performed in Accordance with
*Government Auditing Standards***

The Board of Directors
Tri-County Metropolitan Transportation District of Oregon
Portland, Oregon

We have audited, in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States (*Government Auditing Standards*), the financial statements of the business-type activities and fiduciary activities of the Tri-County Metropolitan Transportation District of Oregon (District), as of and for the year ended June 30, 2025, and the related notes to the financial statements, which collectively comprise the District's basic financial statements and have issued our report thereon dated October 13, 2025.

Report on Internal Control over Financial Reporting

In planning and performing our audit of the financial statements, we considered the District's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the District's internal control. Accordingly, we do not express an opinion on the effectiveness of the District's internal control.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses or significant deficiencies may exist that have not been identified.

Report on Compliance and Other Matters

As part of obtaining reasonable assurance about whether the District's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

A handwritten signature in black ink that reads "Eide Bailly LLP". The signature is written in a cursive, flowing style.

Menlo Park, California
October 13, 2025



Independent Auditor's Report on Compliance for Each Major Federal Program; Report on Internal Control Over Compliance; and Report on the Schedule of Expenditures of Federal Awards Required by the Uniform Guidance

The Board of Directors
Tri-County Metropolitan Transportation District of Oregon
Portland, Oregon

Report on Compliance for Each Major Federal Program

Opinion on Each Major Federal Program

We have audited Tri-County Metropolitan Transportation District of Oregon's (District) compliance with the types of compliance requirements identified as subject to audit in the OMB *Compliance Supplement* that could have a direct and material effect on each of the District's major federal programs for the year ended June 30, 2025. The District's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

In our opinion, the District complied, in all material respects, with the compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2025.

Basis for Opinion on Each Major Federal Program

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America (GAAS); the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States (*Government Auditing Standards*); and the audit requirements of Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Our responsibilities under those standards and the Uniform Guidance are further described in the Auditor's Responsibilities for the Audit of Compliance section of our report.

We are required to be independent of the District and to meet our other ethical responsibilities, in accordance with relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion on compliance for each major federal program. Our audit does not provide a legal determination of the District's compliance with the compliance requirements referred to above.

Responsibilities of Management for Compliance

Management is responsible for compliance with the requirements referred to above and for the design, implementation, and maintenance of effective internal control over compliance with the requirements of laws, statutes, regulations, rules and provisions of contracts or grant agreements applicable to the District's federal programs.

Auditor's Responsibilities for the Audit of Compliance

Our objectives are to obtain reasonable assurance about whether material noncompliance with the compliance requirements referred to above occurred, whether due to fraud or error, and express an opinion on the District's compliance based on our audit. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with GAAS, *Government Auditing Standards*, and the Uniform Guidance will always detect material noncompliance when it exists. The risk of not detecting material noncompliance resulting from fraud is higher than for that resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Noncompliance with the compliance requirements referred to above is considered material, if there is a substantial likelihood that, individually or in the aggregate, it would influence the judgment made by a reasonable user of the report on compliance about the District's compliance with the requirements of each major federal program as a whole.

In performing an audit in accordance with GAAS, *Government Auditing Standards*, and the Uniform Guidance, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material noncompliance, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the District's compliance with the compliance requirements referred to above and performing such other procedures as we considered necessary in the circumstances.
- Obtain an understanding of the District's internal control over compliance relevant to the audit in order to design audit procedures that are appropriate in the circumstances and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of the District's internal control over compliance. Accordingly, no such opinion is expressed.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and any significant deficiencies and material weaknesses in internal control over compliance that we identified during the audit.

Report on Internal Control over Compliance

A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. A *material weakness in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. A *significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the Auditor's Responsibilities for the Audit of Compliance section above and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies in internal control over compliance. Given these limitations, during our audit we did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses, as defined above. However, material weaknesses or significant deficiencies in internal control over compliance may exist that were not identified.

Our audit was not designed for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, no such opinion is expressed.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.

Report on Schedule of Expenditures of Federal Awards Required by the Uniform Guidance

We have audited the financial statements of the business-type activities and the fiduciary activities of the District as of and for the year ended June 30, 2025, and the related notes to the financial statements, which collectively comprise the District's basic financial statements. We issued our report thereon dated October 13, 2025, which contained unmodified opinions on those financial statements. Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise the basic financial statements. The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis as required by the Uniform Guidance and is not a required part of the basic financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the basic financial statements. The information has been subjected to the auditing procedures applied in the audit of the basic financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the schedule of expenditures of federal awards is fairly stated in all material respects in relation to the basic financial statements as a whole.



Menlo Park, California
February 6, 2026

Tri-County Metropolitan Transportation District Of Oregon

Schedule of Expenditures of Federal Awards For the Year Ended June 30, 2025 (DOLLARS IN THOUSANDS)

Federal Grantor / Pass-through Program Title or Cluster	Assistance Listing Number	Pass Through/ Direct Grant Number	Federal Expenditures	Passed Through to Subrecipients
U.S. Department of Transportation				
<u>Federal Transit Cluster:</u>				
Direct Programs:				
Federal Transit - Capital Investment Grants	20.500	OR-2016-007	\$ 3,662	\$ -
Federal Transit - Capital Investment Grants	20.500	OR-2020-001	630	-
Federal Transit - Capital Investment Grants	20.500	OR-2021-001	23	-
Federal Transit - Capital Investment Grants	20.500	OR-2021-036	4,232	-
Federal Transit - Capital Investment Grants	20.500	OR-2023-012	284	-
Total Federal Transit - Capital Investment Grants			8,831	-
Direct Programs:				
Federal Transit - Formula Grants	20.507	OR-2016-013	175	-
COVID-19 Federal Transit - Formula Grants-ARP	20.507	OR-2022-038	51	-
Federal Transit - Formula Grants	20.507	OR-2025-002	11,749	-
Federal Transit - Formula Grants	20.507	OR-2025-003	4,215	-
Federal Transit - Formula Grants	20.507	OR-2025-008	3,708	-
Federal Transit - Formula Grants	20.507	OR-2024-021	20,447	-
Federal Transit - Formula Grants	20.507	OR-2024-018	52,981	-
Passed through from METRO:				
Federal Transit - Formula Grants	20.507	METRO 938598	541	-
Federal Transit - Formula Grants	20.507	METRO 938639	28	-
Federal Transit - Formula Grants	20.507	METRO 939319	1,000	-
Total Federal Transit - Formula Grants			94,895	-
Direct Programs:				
State of Good Repair Grants Program	20.525	OR-2023-037	24,014	-
State of Good Repair Grants Program	20.525	OR-2025-001	24	-
State of Good Repair Grants Program	20.525	OR-2025-012	41,221	-
Total State of Good Repair Grants Program			65,259	-
Direct Programs:				
Buses and Bus Facilities Formula, Competitive, and Low or No Emissions Programs	20.526	OR-2019-004	21	-
Buses and Bus Facilities Formula, Competitive, and Low or No Emissions Programs	20.526	OR-2023-011	1,440	-
Buses and Bus Facilities Formula, Competitive, and Low or No Emissions Programs	20.526	OR-2024-004	213	-
Buses and Bus Facilities Formula, Competitive, and Low or No Emissions Programs	20.526	OR-2025-016	173	-
Total Buses and Bus Facilities Formula, Competitive, and Low or No Emissions Programs			1,847	-
Total Federal Transit Cluster			170,832	-
<u>Transit Services Program Cluster:</u>				
Direct Programs:				
Enhanced Mobility of Seniors and Individuals with Disabilities	20.513	OR-2022-054	167	-
Enhanced Mobility of Seniors and Individuals with Disabilities	20.513	OR-2024-024	1,369	1,338
Total Enhanced Mobility of Seniors and Individuals with Disabilities			1,536	1,338
Passed through from Oregon Department of Transportation:				
Enhanced Mobility of Seniors and Individuals with Disabilities	20.513	ODOT 35496	582	-
Enhanced Mobility of Seniors and Individuals with Disabilities	20.513	ODOT 35497	872	-
Total Passed through from Oregon Department of Transportation			1,454	-
Total Transit Services Program Cluster			2,990	1,338
Passed through from Oregon Department of Transportation:				
Highway Research and Development Program	20.200	ODOT 33825	459	-
Total Highway Research and Development Program			459	-
Direct Programs:				
Metropolitan Transportation Planning and State and Non-Metropolitan Planning	20.505	OR-2024-022	630	-
Passed through from METRO:				
Metropolitan Transportation Planning and State and Non-Metropolitan Planning	20.505	METRO 937638	53	-
Total Metropolitan Transportation Planning and State and Non-Metropolitan Planning			683	-
Direct Programs:				
Public Transportation Innovation	20.530	OR-2021-004	109	-
Total Public Transportation Innovation			109	-

See accompanying notes to the Schedule of Expenditures of Federal Awards

Tri-County Metropolitan Transportation District Of Oregon

Schedule of Expenditures of Federal Awards, continued For the Year Ended June 30, 2025 (DOLLARS IN THOUSANDS)

Federal Grantor / Pass-through Program Title or Cluster	Assistance Listing Number	Pass Through/ Direct Grant Number	Federal Expenditures	Passed Through to Subrecipients
U.S. Department of Transportation (cont'd)				
Direct Programs:				
Community Project Funding Congressionally Directed Spending	20.534	OR-2023-014	292	-
Community Project Funding Congressionally Directed Spending	20.534	OR-2023-045	291	-
Community Project Funding Congressionally Directed Spending	20.534	OR-2024-016	888	-
Community Project Funding Congressionally Directed Spending	20.534	OR-2024-017	7	-
Community Project Funding Congressionally Directed Spending	20.534	OR-2024-020	1,365	-
Total Community Project Funding Congressionally Directed Spending			2,843	-
Total U.S. Department of Transportation			177,916	1,338
U.S. Department of Homeland Security				
Direct Programs:				
Rail and Transit Security Grant Program	97.075	EMW-2020-RA-00008	86	-
Rail and Transit Security Grant Program	97.075	EMW-2021-RA-00013	339	-
Rail and Transit Security Grant Program	97.075	EMW-2022-RA-00018	371	-
Total Rail and Transit Security Grant Program			796	-
Total U.S. Department of Homeland Security			796	-
Total Federal Financial Assistance			\$ 178,712	\$ 1,338

See accompanying notes to the Schedule of Expenditures of Federal Awards

Notes to the Schedule of Expenditures of Federal Awards
For the Year Ended June 30, 2025
(Dollars in thousands)

1. Reporting Entity

The Tri-County Metropolitan Transportation District of Oregon ("TriMet" or "the District") was organized under the provisions of Oregon Revised Statutes (ORS) Chapter 267 to provide mass transit services to the Portland metropolitan area. Formation of the District, which includes parts of Multnomah, Clackamas, and Washington counties, was effective October 14, 1969 with the assumption of the operations of a privately owned bus system.

2. Basis of Presentation

The accompanying Schedule of Expenditures of Federal Awards (the "Schedule") includes all federal grant activity of Tri-County Metropolitan Transportation District of Oregon (the District), under programs of the federal government for the year ended June 30, 2025. The information in this Schedule is presented in accordance with the requirements of Title 2 U.S. *Code of Federal Regulations* (CFR) Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). The District receives both direct and pass through awards. Federal awards are reported in the District's financial statements as operating grant revenue and capital contributions. Because this Schedule presents only a selected portion of the operations of the District, it is not intended to and does not present the financial position, changes in net position or cash flows of the District.

The program titles and federal financial Assistance Listing Numbers (ALN) are obtained from the federal or pass-through grantor. When no ALN number is assigned to a program, the two-digit federal agency identifier and the federal contract number are used. When there is no federal contract number, the two-digit federal agency identifier and the word "unknown" is used.

3. Summary of Significant Accounting Policies and Revenue and Expense Recognition

Expenditures reported on the Schedule are reported on the accrual basis of accounting, which is consistent with the financial statements, as described in Note 1 to the District's June 30, 2025 financial statements. Pass-through expenditures to subrecipients are reported on the cash basis of accounting. Such expenditures are recognized following the cost principles contained in Uniform Guidance, wherein certain types of expenditures are not allowable or are limited as to reimbursement.

4. Indirect Cost Rate

The District does not utilize the 10 percent de minimis indirect cost rate for overhead allocation.

5. Subrecipients

Included within the federal expenditures presented in the Schedule of Federal Awards are federal awards to subrecipients.

	Federal Assistance Listing Number	Grant Number/TriMet Contract number	Total Expenditures
Ride Connection	20.513	OR-2024-024 / JC230822GSL	\$ 1,274
Clackamas County	20.513	OR-2024-024 / GO250803GS	63
Portland State University	20.513	OR-2024-024 / GO240813GSL	1
Total Subrecipient Expenditures			\$ 1,338

**Schedule of Findings and Questioned Costs
For the Year Ended June 30, 2025**

Section I - Summary of Auditor's Results

Financial Statements

Type of report the auditor issued on whether the financial statements audited were prepared in accordance with GAAP: Unmodified

Internal control over financial reporting:

- Material weakness(es) identified? ☐ Yes ☒ No
- Significant deficiency(ies) identified? ☐ Yes ☒ None reported
- Noncompliance material to financial statements noted? ☐ Yes ☒ No

Federal Awards

Internal control over major federal programs:

- Material weakness(es) identified? ☐ Yes ☒ No
- Significant deficiency(ies) identified? ☐ Yes ☒ None reported

Any audit findings disclosed that are required to be reported in accordance with 2 CFR 200.516(a)? ☐ Yes ☒ No

Identification of Major Federal Programs and type of auditor's report issued on compliance for major federal programs

<i>Federal Financial Assistance Listing</i>	<i>Name of Federal Program or Cluster</i>	<i>Type of Auditor's Report Issued</i>
20.500, 20.507, 20.525, 20.526	Federal Transit Cluster (Includes ARP / COVID-19 funding)	Unmodified

Dollar threshold used to distinguish between type A and type B programs: \$3,000,000

Auditee qualified as low-risk auditee? ☒ Yes ☐ No

Section II - Financial Statement Findings

None reported

Section III - Federal Award Findings and Questioned Costs

None reported

Section IV – Summary Schedule of Prior Audit Findings

None reported