Los Angeles County
Metropolitan Transportation Authority
Office of the Inspector General

Follow-Up Review on Audit of

Access Services

> *The follow-up review found that Access Services initiated corrective actions to implement all of the 16 recommendations in the prior audit report. These actions have improved the eligibility process, and services and operations.*

Report No. 11-AUD-07   **November 29, 2010**

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Follow-Up Review on Audit of Access Services
Report No. 11-AUD-07

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DATE: November 29, 2010

TO: Access Services Executive Director
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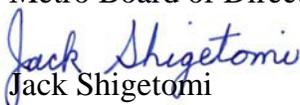
FROM: Jack Shigetomi
             Deputy Inspector General - Audits

SUBJECT: **Follow-Up Review on Audit of Access Services**
               Report No. 11-AUD-07

Introduction

The Office of the Inspector General (OIG) performed a follow-up review of the implementation of 16 recommendations in the prior audit report on Access Services, "Report on the Evaluation of the Paratransit Eligibility Process: Administration, Performance, and Management of Paratransit Operations; and Compliance with Memorandum of Understanding," issued on January 22, 2008.[1] This audit was conducted in conjunction with an audit consulting firm (Thompson, Cobb, Bazilio & Associates, PC) under a contract with the OIG.

Access Services is a state mandated local governmental agency created by Los Angeles County's public transit agencies to administer and manage the delivery of regional Americans with Disabilities Act (ADA) paratransit service. Access Services was established by 44 public fixed route transit operators in Los Angeles County, and is governed by a nine-member Board of Directors. To accomplish its responsibilities, Access Services contracts with (1) a single contractor to conduct Americans with Disabilities Act (ADA) paratransit eligibility evaluations, (2) six paratransit service providers that cover services for six regions within Los Angeles County, and (3) seven contractors that provide services to adjudicate eligibility appeals.

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[1] Two other companion reports were concurrently completed: (1) "Report on the Results of a Survey of Individuals Completing the Access Services Incorporated ADA Paratransit Eligibility Process," and (2) "Report on the Results of a Survey of Riders on Access Services Incorporated ADA Paratransit Services." These two reports did not contain separate recommendations; the results of those reports were incorporated into the main report.

As of June 30, 2010, Access Services had 91,826 eligible riders. During Fiscal Year (FY) 2010, Access Services service contractors provided over 2.1 million ADA paratransit trips to about 2.8 million passengers totaling 33.4 million miles. In addition, during FY 2010, Access Services' eligibility determination contractor conducted 27,737 eligibility evaluations, which consisted of 21,039 new applicants and 6,698 recertifications.[2] In FY 2010, 736 requests for eligibility determination appeals were received, 780 appeals were closed. Further information concerning these appeals is contained in Attachment A to this report.

The follow-up review found that Access Services had implemented the 16 recommendations in the prior audit report.

Objective, Scope, and Methodology of Review

The objective of this review was to determine whether Access Services Management had implemented the 16 recommendations in the prior audit report. To accomplish this objective, we:

- ➢ Reviewed the prior audit reports and Access Services management's corrective action plan;

- ➢ Interviewed the Access Services Executive Director, Chief Operations Officer, and other staff;

- ➢ Interviewed the Chief Executive Officer at C.A.R.E. evaluators, LLC, which provides the eligibility evaluations for Access Services;

- ➢ Toured the facilities at Access Services and C.A.R.E., both of which moved to new locations since the last audit; and

- ➢ Reviewed policies and procedures, reports, statistical data, and other appropriate documentation.

Our review was performed in accordance with Government Auditing Standards for staff qualifications, independence, and due professional care and included such tests of procedures and records, as we considered necessary.

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[2] The new applications have increased substantially, while the recertifications have decreased due to modified procedures as a result of the prior audit's Recommendation 1 as shown in Attachment A.

Background

Prior Audit Report Findings

The 2008 audit report made 16 recommendations to improve the eligibility process and access service operations. Some of the more significant findings were:

> ➤ Access Services' policy decision to implement functional testing to determine paratransit eligibility resulted in a significant increase in eligibility denials.

> ➤ Access Services should consider revising its policy on recertifying all eligible paratransit riders every 3 years.

> ➤ Access Services' eligibility determination policies and processes were found to be in compliance with the ADA.

> ➤ Access Services paratransit clients surveyed were found to be generally satisfied with paratransit services and the eligibility determination process.

> ➤ Access Services' management and use of the complaint database needs improvement.

> ➤ Access Services should require paratransit service providers to conduct annual performance evaluations of drivers to assess driver conduct.

Results of Follow-Up Review

The review found that Access Services management had completed corrective actions to implement all 16 recommendations in the prior audit report. These actions have improved the eligibility process, services, and operations. (See Attachment A for details of each specific recommendation, Access Services actions taken, and follow-up results.) Some of the more significant actions taken were:

Actions Taken by Access Services

> ➤ Access Services developed and implemented a modification to the recertification policy to allow for a tiered approach to eligibility without the need for an in-person interview or functional test for individuals that the Eligibility Contractor determined their disability is unlikely to change. Now a portion of eligible riders are recertified without the need to go through an in-person interview or functional test. Following the release of our prior audit report, there has been a 60% reduction in recertification evaluations. During the same period, new applicant evaluations increased by 75%.

The new recertification policy freed up resources to conduct the additional evaluations for new applicants.

➢ The Eligibility Contractor moved to a larger and improved facility after the prior audit. This facility provides a more comfortable evaluation experience and environment for the applicants. In addition, the new facility provides a realistic simulation of conditions applicants would encounter using public transit.

➢ The Access Services Board approved new software in September 2010 for the contractors to use in reserving and scheduling rides. This scheduling software is designed to minimize wait times and trip times, which were the top concerns that riders expressed during the prior audit.

➢ Access Services established Codes of Conduct for Order Takers and Drivers, and required service providers to perform annual evaluations of all drivers. Following the release of our prior audit report, there has been a 54% decrease in conduct complaints.

➢ Access Services established training and testing to assure that all Order Takers are aware that they should ask the rider if they want a "call out" before the van arrives to pick them up. Examinations for both Drivers and Call Takers include questions to test their knowledge of these procedures before they can become Access certified.

➢ Access Services developed a procedures manual for the complaint process, so that all complaints will be handled uniformly. In addition, Access Services modified the performance indicator "Service Complaints per 1,000 Trips" to track 14 categories of complaints rather than the 7 categories used prior to our previous audit.

➢ Access Services established more stringent reservation call hold time standards, and initiated a reward/penalty system for contractor hold time performance. Following the release of our prior audit report, average call hold times decreased by 69%.

Conclusion

Access Services management has implemented all 16 recommendations from the prior report. The actions taken by Access Services management to implement the recommendations and other self-initiated programs have improved paratransit service. One measure that reflects these actions is the decrease of total complaints by 30% since FY 2005.

Details of Follow-Up Review of Prior Audit

Recommendation 1 – (Completed)

Access Services should reassess its recertification policy and consider a) periodically reviewing its criteria for determining individuals that are allowed to renew without in-person reevaluations, b) increasing the recertification period on a case-by-case basis, and c) adopting a tiered approach for recertifying riders. The tiered eligibility determination approach should include an option to recertify a rider without the need for a face-to-face interview or functional test.

Access Services Actions

Access Services initiated the following actions to complete the implementation of the recommendation:

➤ Developed a proposed modification to the recertification policy that allows for a tiered approach to eligibility without the need for an in-person interview or functional test. The proposed revision was presented to the Transportation Professionals Advisory Committee (TPAC) on April 10, 2008, and the Quality Services Subcommittee (QSS) on April 17, 2008, and a public hearing was held on April 22, 2008. The Community Advisory Committee (CAC) discussed the revision at their May 13, 2008, meeting and member agencies provided their input via electronic mail.

➤ Staff prepared a recommendation for the Access Services Board to approve an update to the Coordinated ADA Paratransit Plan specifying changes to the recertification process.

➤ At the regular Access Services Board meeting on May 19, 2008, the Board of Directors approved Agenda Item 10 – Revision of Paratransit Plan Update, which modified the recertification process to include a tiered approach versus a mandatory in-person evaluation for all eligibility recertifications. The changes became effective July 1, 2008.

➤ The updated Paratransit Plan was mailed to FTA.

OIG Follow-Up Review

We found that Access Services had implemented the recommendation. Access Services developed and implemented a modification to the recertification policy to allow for a tiered approach to eligibility without the need for an in-person interview or functional test. The new reevaluation policy was published in the later part of FY 2008 and became fully effective in FY 2009.

We reviewed the current Access Services Eligibility and Appeals Providers Policies and Procedures Manual, Section I, Policy # 9, titled Recertification Process. The policy states that Access Paratransit riders designated by the Eligibility Contractor as having a disability related condition that will not change or improve over time or with the advent of new technology to

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functionally enable the rider to use fixed route transit or is 75 years old or greater with unrestricted eligibility will be excluded from the in-person reevaluation process. However, they will be required to complete an informational update form.

Our analysis of eligibility evaluations found that the number of recertifications has decreased following our previous audit, and the number of new applications has increased, as shown below:

Chart 1 – Number of New Applicants and In-Person Recertifications
FY 2005 – FY 2010

ASI Total Evaluations Completed For New Applicants and Recertifications

	FY 2005	FY 2006	FY 2007	FY 2008	FY 2009	FY 2010
Recertifications (in-person)	4,034	13,100	16,958	14,329	7,145	6,698
New Applicants	19,835	12,242	12,020	15,991	18,568	21,039
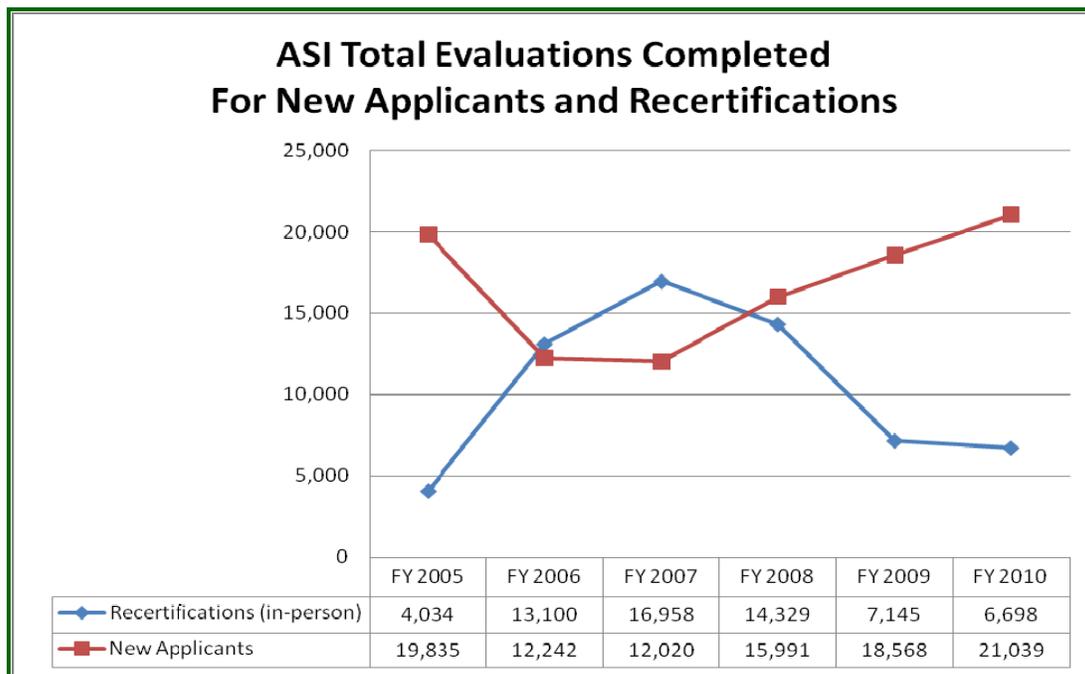
In response to our inquiry about the above trend in the number of evaluations completed for new applicants and recertifications, Access Services staff stated:

> *"In 2005 Access mandated that all riders must come in for a recertification re-evaluation which explains the increase in recertification through FY 07 and 08. The dip in new applicants during FY 06 – FY 07 is most likely the result of a good economy and lower gas prices. By 2009, Access experienced the complete opposite: Gas prices at highest levels, unemployment, sagging economy, aging baby boomers, and budget cuts resulting in service cuts in adult services pushed more applicants to Access."*

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We also found that the number of "not eligible" determinations has declined by more than 50% from FY 2005 to FY 2010; during the same period, the number of unrestricted, restricted, and temporary determinations increased, as shown below:

Chart 2 – Eligibility Determination Categories
FY 2005 – FY 2010

ASI Eligibility Determination Outcomes

	FY 2005	FY 2006	FY 2007	FY 2008	FY 2009	FY 2010
Unrestricted	16,620	16,553	20,705	23,401	18,564	20,340
Restricted	516	2,348	2,830	2,475	2,435	3,082
Temporaty	1,848	1,901	2,061	1,871	2,327	2,125
Not Eligible	4,985	4,540	3,382	2,573	2,387	2,190
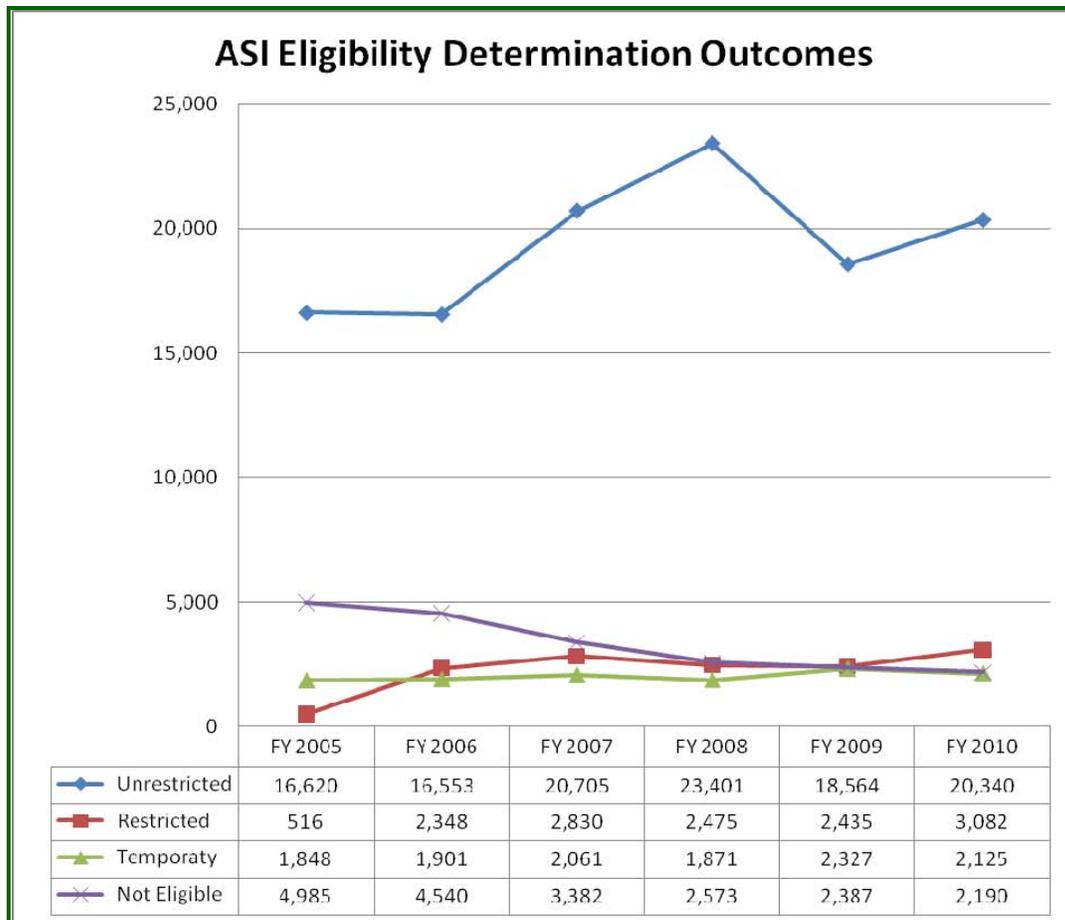
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Our analysis also found that eligible evlauation outcomes increased from 79.2% in FY 2005 to 92.1% in FY 2010, and "not eligible" outcomes decreased from 20.8% to 7.9% during the same period, as shown below:

**Chart 3 – Percentage of Applicants Determined Eligible vs. Ineligible
FY 2005 – FY 2010**

**ASI Eligibility Determination Outcomes
Percent Eligible and Ineligible**

	FY 2005	FY 2006	FY 2007	FY 2008	FY 2009	FY 2010
Elibible	79.2%	82.1%	88.3%	91.5%	90.7%	92.1%
Not Eligible	20.8%	17.9%	11.7%	8.5%	9.3%	7.9%
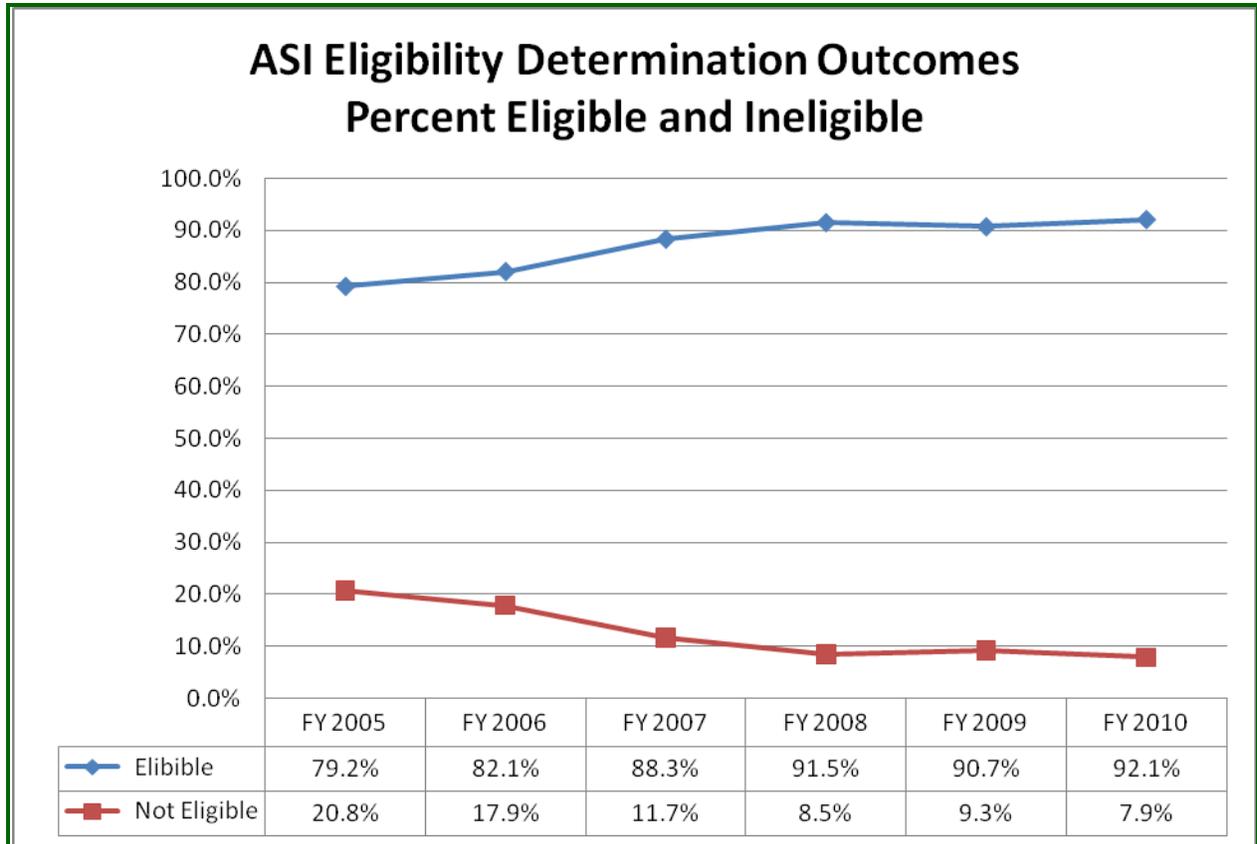
In response to our inquiry about the above trend in the reduction of eligibility denials since FY 2005, Access Services staff stated:

"This trend can be attributed to the switch to in-person functional evaluations in 2005, which improved Access' ability to obtain an accurate and fair ADA paratransit eligibility determination. After the switch, there was an initial spike in eligibility denials because of the improved eligibility process, and also led to an increase in appeals requested. The drop in denial percentage thereafter is a result of better public awareness of the improved eligibility process, which applicants consider before applying for eligibility."

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Recommendation 2 (Completed)

Access Services should a) review the narrative comments included on the Eligibility Survey and initiate any appropriate actions or changes, b) consider client comments/concerns when making any future changes or improvements to the eligibility evaluation process or the evaluation facility, and c) evaluate whether Access Services can offer more evaluation locations through the use of mobile evaluation units.

Access Services Actions

Access Services initiated the following actions to complete the implementation of the recommendation:

➢ All of the narrative comments from the customer eligibility survey were reviewed and organized into categories of service.

➢ The customer narrative comments were reviewed at the May 2008 QSS meeting, and the top concerns raised in the audit survey were used as a blueprint for discussion at future meetings.

➢ In September 2008, the customer narrative comments on the eligibility process were presented to QSS, which prioritized the narrative comments for discussion at future meetings. Any recommendations will be presented to the CAC as appropriate.

Follow-Up Review

Many of the eligibility customer survey narrative comments dealt with the evaluation facility and the evaluation process. We visited the new facility occupied by C.A.R.E. evaluators, LLC, near downtown Los Angeles, and found that significant improvements have been implemented since the prior audit. The new evaluation facility is larger (about 14,000 square feet compared to about 9,000 at the old facility), has 11 reserved parking spaces, and provides a more comfortable experience and environment for applicants. The new facility has heating and air conditioning, which the former facility did not have. In addition, the evaluation area provides a realistic simulation of conditions that the applicants would encounter getting to and boarding public transportation. For example, the evaluation area has actual buses and fare boxes so that applicants' can be better evaluated on their ability to use public transit (see photographs of the evaluation facility on the following pages).

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Photograph 1: Facility Entrance and Waiting Area

Photograph 1 depicts the initial evaluation processing area; the bus on the right is part of the waiting area. After the initial check-in and processing functions are completed, applicants are sent to the transit evaluation area.

Photographs 2 and 3: Evaluation Facility Transit Area

Photographs 2 and 3 show the transit evaluation area. Photograph 2 shows a low floor bus, which has a fare box used in the evaluation. A high floor bus is shown in photograph 3.

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Photographs 4 and 5: Evaluation Facility Transit Area

Photograph 4 shows stations where evaluation staff interview applicants, and photograph 5 shows the walking course, which is used to evaluate the applicants' ability to navigate on various surfaces.

Photographs 6 and 7: Evaluation Facility Transit Area

Photograph 6 shows various ramps/steps in evaluation area. After the evaluation is completed, the applicants are provided training on how to board and disembark paratransit vans (body of an Access Services van is shown in Photograph 7).

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Recommendation 3 (Completed)

Access Services should evaluate the process for informing individuals who complete the eligibility evaluations of their right to appeal and the process on how to make an appeal.

Access Services Actions

Access Services initiated the following actions to complete the implementation of the recommendation:

➢ Access Services re-evaluated the eligibility determination information packet with the help of TPAC and CAC to ensure that appeal information is presented in a manner most likely to be understood by applicants. Access Services also worked with communications professionals and small focus groups.

➢ On July 17, 2008, the QSS reviewed recommended changes to the eligibility information packet.

➢ The Board of Directors approved the changes to the Access Paratransit information packet at the February 2009 meeting.

➢ The eligibility and appeal information packet consisted of four different parts, which was condensed and simplified into one user friendly document.

➢ The final proof of the new eligibility information guide was completed in early August 2009.

➢ The Metro Design Center made final changes to the layout of the information guide and submitted the document to the print shop on October 13, 2009.

Follow-Up Review

We reviewed the above mentioned information guides ("Applying for Access" and "Appeal Process for Access Services") that were revised by Access Services. Both of these guides are provided to all paratransit applicants and are also posted on the Access Services website. We determined that the revised guides sufficiently inform applicants of their right to appeal and the process on how to make an appeal. For example, the guide on "Applying for Access" states: "If you disagree with the eligibility determination, you have the right to appeal our assessment within 60 days of the eligibility notice. Information on the appeal process will be sent to you with the eligibility determination." In addition, the "Appeal Process for Access Services" information sheet is sent out with the eligibility determinations to paratransit applicants. This document explains the appeal process and includes an appeal form.

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Our analysis found that the number of appeals requested and closed increase from FY 2005 to FY 2007, then decreased following our previous audit, as shown below:

Chart 4 – Total Number of Appeals Requested and Closed
FY 2005 – FY 2010

ASI Eligibility Appeals	FY 2005	FY 2006	FY 2007	FY 2008	FY 2009	FY 2010
Appeals Requested	1,048	1,636	1,528	968	774	736
Appeals Closed	359	1,490	1,669	958	839	780
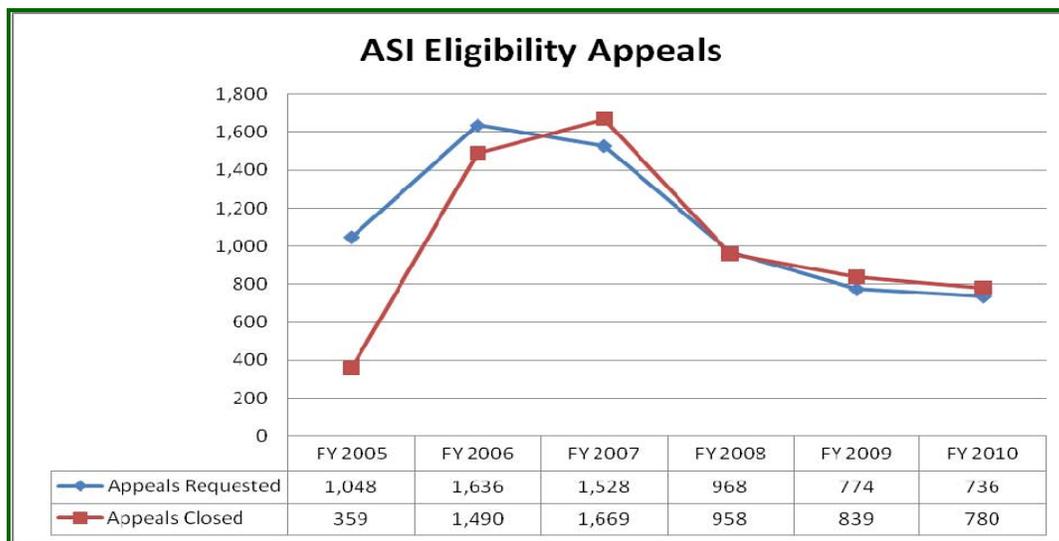
In response to our inquiry about the above trend in the decline in appeals following our previous audit, Access Services staff stated:

> *"The trend in appeals requested inversely follows the trend in eligibility outcomes during the same period. With an increase in eligibility denials, peaking in 2005 and subsequently dropping, the appeals requested also peaked in 2005 and subsequently dropped. These trends are attributed to the switch to in-person functional evaluations in 2005, which improved Access' ability to obtain an accurate and fair ADA paratransit eligibility determination. After the switch, there was an initial spike in eligibility denials because of the improved eligibility process, which consequently increased the number of appeals requested. With better public awareness of the eligibility process for Access over time, eligibility denials have decreased, which then reduces the number of appeals requested."*

The outcomes of the appeals process include determinations which are upheld and determinations that are changed, such as an increase from Restricted to Unrestricted, Not Eligible to one of the Eligible categories, etc. Our analysis found that in FY 2005, 61% of the appeals resulted in upheld determinations and 39% resulted in changed outcomes. However, by FY 2010, the difference between these two categories significantly narrowed, as shown in the chart on the following page.

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Chart 5 – Percentage of Appeal Outcome Changes and Upheld
FY 2005 – FY 2010

ASI Eligibility Appeals Outcome

	FY 2005	FY 2006	FY 2007	FY 2008	FY 2009	FY 2010
Changed Outcomes	38.6%	41.0%	47.3%	38.5%	44.2%	47.8%
Upheld Determinations	61.4%	59.0%	52.7%	61.5%	55.8%	52.2%
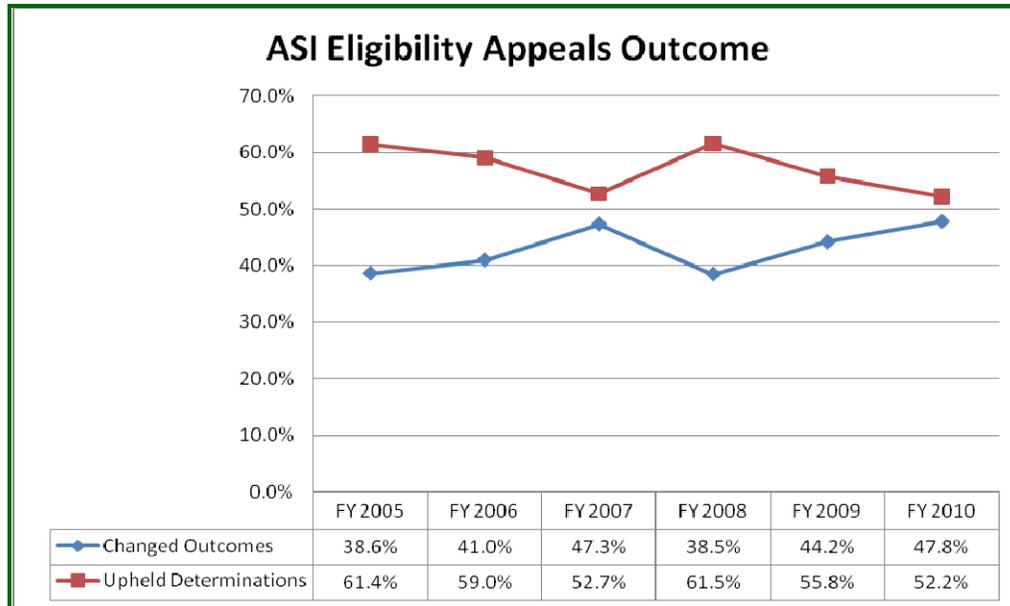
In response to our inquiry about the above trend in the increase of appeals overturned, Access Services staff stated:

"We attribute this relatively high overturn to the more comprehensive appeals evaluation performed by our eligibility provider. Appellants are assigned an appeals specialist who can include a medical physician, licensed psychologist, physical therapist, and/or mobility evaluators. The appeal allows a more comprehensive look into an applicant's medical and psychological history, which have a potential to determine an applicant's ability to use the fixed route system, beyond the original functional examination."

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Recommendation 4 (Completed)

Access Services should continue to critically evaluate its eligibility determination policies, general approach, and specific processes to ensure that reasonable eligibility determinations are being made, that the impact on and inconvenience for those seeking eligibility is reasonable, and that the total costs of the eligibility determination process are consistent with the value of the process.

Access Services Actions

Access Services initiated the following actions to complete the implementation of the recommendation:

➢ The eligibility evaluation contractor (C.A.R.E.) held its first Customer Care Committee meeting on June 29, 2008. Seven riders attend the meeting and discussed their experience with the evaluation process. C.A.R.E. used those comments to train staff and modify customer service procedures. The Committee will be meeting once a month.

➢ Access Services also implemented a revised recertification process and opened a new eligibility evaluation facility in July 2008.

Follow-Up Review

We found that the Access Services website includes a calendar of their meetings, such as the Board meetings, Community Advisory Committee meetings, and local Community meetings. CARE also has a website with information on the evaluation process, etc., and includes a contact form. In addition, Access Services revised the recertification policy to allow for a tiered approach to eligibility without the need for an in-person interview or functional test for individuals that the eligibility contractor determined their disability is unlikely to change.

Recommendation 5 (Completed)

Access Services should review the narrative comments on the Rider Survey and initiate any appropriate actions or changes.

Access Services Actions

Access Services initiated the following actions to complete the implementation of the recommendation:

➢ All of the narrative comments from the rider surveys have been organized into categories of service. For instance, comments regarding the order taking process have all been

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grouped together. Access Services staff reviewed the comments to identify areas of concern.

➢ Narrative comments from the rider survey were placed on the May Quality Services Subcommittee (QSS) meeting agenda, and the May 2008 Provider meeting agenda. The QSS and Provider groups reviewed the narrative comments from the Rider Survey. Each group agreed that the top concerns would be discussed at future meetings to determine how to improve the service.

➢ On July 17, 2008, the QSS prioritized the narrative comments from the rider surveys into four groups with subtopics to be discussed at future meetings beginning in August 2008. Any recommendations will be presented to the CAC, as appropriate.

➢ In August 2008, the QSS committee began discussion of the narrative comments. The committee agreed to have the narrative comments as a standing item on their agenda until all of the groups have been discussed and the appropriate action taken.

Follow-Up Review

We found that the Access Services website posted the agendas for the QSS meetings to the public. Access Services staff informed us that they do hold periodic local community meetings twice per year in each region. These meetings are listed on the Access Services website calendar and are open to the public. We reviewed the QSS meeting minutes from May 2008 through July 2009, and found that the QSS discussed the rider survey comments and accepted the actions taken by Access Services to address these comments.

Recommendation 6 (Completed)

Access Services should evaluate whether the service providers are using the most efficient methodology for scheduling vehicles and drivers and whether there are opportunities to shift resources from low demand to peak demand periods.

Access Services Actions

Access Services initiated the following actions to complete the implementation of the recommendation:

➢ Prior to the OIG audit, Access Services retained the services of the IBI Group to perform a Needs Analysis on Access Services' Access Paratransit service. The recommendations from the analysis were presented to the Access Services Board of Directors in March 2007. One of the principal recommendations was the design and implement of a centralized reservation/scheduling software to be used by all Access Services providers.

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The Board approved the award for the reservation/scheduling software in November 2007.

➢ A notice to proceed was issued to the software contractor on June 9, 2008, and a kick off meeting was held with Global Paratransit.

➢ Implementation began in the Southern Region. The next region scheduled for implementation is MV Transit in the San Fernando Valley.

➢ As of April 2010, software is being utilized for reservations in the Southern region.

➢ Staff has received a draft report titled "Computer System Review and Recommended Decision Making Framework." The report will be used to define "Success." A full report on the software was presented at the September 2010 Board meeting, and the Board approved completion of the centralized reservation and scheduling software project.

Follow-Up Review

We determined that Access Services has implemented action to acquire a new centralized reservation/scheduling software. We reviewed the Access Services Board agenda for the October 29, 2010, meeting and found that the Board approved the new reservation/scheduling system at the September meeting.

Recommendation 7 (Completed)

Access Services should reinforce to contractor call takers the goal of providing courteous and helpful service to clients. In this regard, Access Services should provide call takers with a written document that reinforces the policies and rules of conduct and service to paratransit customers, and Access Services' commitment to quality service.

Access Services Actions

Access Services initiated the following actions to complete the implementation of the recommendation:

➢ Access Services staff developed an Order Taker Code of Conduct, and presented the proposed code of conduct to the Transportation Service Providers at a meeting in May 2008.

➢ As of July 2008, the Order Taker Code of Conduct has been finalized, distributed, and posted on the Access Services website.

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Follow-Up Review

We verified that Access Services had developed an Order Taker Code of Conduct. We reviewed the code of conduct, and believe that new code of conduct meets the intent of the audit recommendation. Requirements in the code include:

- ➢ Provide quality customer service by being professional, courteous, and respectful at all times.
- ➢ Treat all riders with the best quality reservation service by following all requirements associated with proper phone etiquette and good customer service.
- ➢ Speak clearly with an appropriate rate of speech and good pronunciation, and speaking with a tone that is pleasant, businesslike, and uses positive language.
- ➢ Interact with riders in a manner that demonstrates interest, understanding, and willingness to help.
- ➢ Offer an appropriate level of assistance to all riders by being sensitive to their disability, awareness and/or lack of understanding.
- ➢ Ensure that riders confirm their Access ID, eligibility, and any mobility devices and/or PCAs during the scheduling of their trip.

Recommendation 8 (Completed)

Access Services should evaluate the scheduling system to minimize or eliminate circuitous routing of share rides and to ensure that the routing/dispatching methodology minimizes wait times and trip times.

Access Services Actions and Follow-Up Review

See actions taken for Recommendation 6 above. We found that Access Services implemented a new centralized reservation/scheduling software system, which meets the intent of Recommendation 8.

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Recommendation 9 (Completed)

Access Services should reinforce to contractor staff Access Services' policy on call-outs, and the importance of making all call outs that are requested.

Access Services Actions

Access Services initiated the following actions to complete the implementation of the recommendation.

 ➢ Access Services redesigned new employee training tests for drivers, call takers, and dispatchers to add questions regarding call-out procedures on the tests. The driver, call taker, or dispatcher is required to pass this test with a score of 90% or greater before they are allowed to work on the Access Services contract.

 ➢ Access Services Road Supervisors and Dispatch Coordinators are monitoring each contractor for compliance with currently required continuous training. The call-out procedures are a part of that training.

 ➢ Service providers were instructed to include call-out procedures in their training programs beginning in May 2008.

Follow-Up Review

Our review found that Access Services has completed actions to implement the recommendation. The service providers have emphasized the Access Services policy on call-outs to their employees. For example, the training material of one service provider (Global Paratransit, Inc.), included a "Memo: To All Drivers" that stated: "All drivers must 'Call-out' all possible trips noted on order." In addition, we found that the examinations given to all drivers, call takers, and dispatchers to become Access certified now include specific questions concerning call-outs.

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Recommendation 10 (Completed)

Access Services should reinforce to service provider contractors Access Services' goal of providing courteous and quality service to clients. In this regard, Access Services should provide contractor drivers and call takers with a written document, which reinforces the policies and rules of conduct and service to paratransit customers, and Access Services' commitment to quality service.

Access Services Actions

Access Services initiated the following actions to complete the implementation of the recommendation.

➢ A Drivers' Code of Conduct was developed and distributed to all certified drivers.

➢ The Driver Code of Conduct was delivered to contractors on May 1, 2008, for distribution to drivers; and the code of conduct is posted on the Access Services website.

➢ Access Services also developed and implemented a Call Taker Code of Conduct (see Recommendation 7).

Follow-Up Review

We verified that Access Services had developed a Drivers' Code of Conduct (modeled after Metro's Operator's Code of Conduct[3]). We reviewed this code of conduct, and believe it meets the intent of the audit recommendation. Requirements in the code of conduct include:

- Provide quality customer service by being professional, courteous, and respectful at all times.
- Provide the best quality curb-to-curb service; not door-to-door. Drivers will assure quality service by stopping at curb as close as possible to pick-up/drop off location, without having to enter any private residence or buildings.
- Offer an appropriate level of assistance as needed or requested to all riders, by assisting riders when boarding and disembarking the vehicle from the sidewalk.
- Ensure that all passengers are wearing seat belts at all times while vehicle is in motion.
- Maintain a clean and odorless vehicle and refraining from smoking on duty.
- Preserve a safe environment for riders by limiting distractions and refraining from using cell phones, pagers, music devices, and other communication devices that will prevent drivers from providing the best quality service possible.
- Drive safely and respecting the laws of the road by driving in a considerate manner and not under the influence of alcohol, prescription drugs, narcotics or other illegal drugs.

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[3] Section 4 of The Operator's Rulebook and Standard Operating Procedures.

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- Maintain a professional appearance, good hygiene and grooming standards by limiting excessive jewelry, make-up, hairstyles, body piercing, and tattoos while on duty.
- Treat all riders with the best quality service by following all requirements associated with wheelchair securement and the provision of service to service animals.

Recommendation 11 (Completed)

Access Services should reinforce to paratransit applicants and riders that the primary purpose of using Access Paratransit Services is that the individual is unable to use the regular bus and rail service.

Access Services Actions

Access Services initiated the following actions to complete the implementation of the recommendation:

➢ Access Services worked with the TPAC and the CAC to ensure that information on eligibility is consistent with the recommendation and presented in a manner most likely to be understood by applicants.

➢ In addition to the information guides discussed in Recommendation 3, the new eligibility center's transit theme and presentation should reinforce the connection between Access Paratransit and regular bus and rail service.

➢ The Metro Design Center made final changes to the information guide and submitted the document for printing on October 13, 2009. The revised information guide is now being provided to paratransit applicants.

Follow-Up Review

We found that the new information guide ("Applying for Access") reinforces to paratransit applicants and riders that the primary purpose of using Access Services is that the individual is unable to use the regular bus and rail service. The document states: "Eligibility is based on a person's functional ability to use accessible buses and trains…"

Details of Follow-Up Review of Prior Audit

Recommendation 12 (Completed)

Access Services should:

a) Develop a written manual or procedures for processing and inputting complaints, and ensure that the list of complaint type codes and definitions are kept up-to-date.

b) Institute a formal training program for the employees who handle complaints, for both new employees and periodic refresher training for current employees.

c) Record all complaints relevant to the eligibility determination process so that any underlying problems can be trended and solved.

d) Conduct a periodic trend analysis of complaints to identify problem areas to improve customer service.

e) Develop a specific process to mark closed complaints, and incorporate this process into the policy and the staff training materials.

f) Re-evaluate the complaint types used in the performance measure of Complaints per 1,000 Trips.

g) Assure that no sequential complaint numbers are deleted from the database.

Access Services Actions

Access Services initiated the following actions to complete the implementation of the recommendation:

a) In April 2008, the Complaints and Customer Service departments developed a procedures manual with input from the Complaints Process Modification Subcommittee of the CAC.

b) As of January 12, 2008, formal training now includes Customer Service workshops, as well as follow up and refresher training, one-on-one review with all Customer Support Supervisors and management, side-by-side training, and review of completed procedures manual. Complaint Specialists now attend regular monthly meetings to address any observations and/or needed refresher training to ensure that procedures remain standardized. New staff members are now required to train with both Customer Service and Complaints and are provided a copy of the procedure manual.

c) As of February 25, 2008, all complaints related to eligibility have been entered into the complaint database, as well as, the relevant eligibility or appeal record.

d) More intense trend analysis of complaints has been in place since January 29, 2008. The new complaint procedures have freed up additional time so that staff can dedicate more of their resources to the analysis of information.

e) A specific process to mark closed complaints has been included in the complaint procedures manual.

Details of Follow-Up Review of Prior Audit

f) Additional complaint categories have been added to the service complaints per 1,000 trips: Animal, Booking, Conduct, Discourtesy, Routing, Service, Travel time, Urgent and Vehicle. These additional categories are now reflected in the operations report to the Board of Directors beginning April 2008.

g) Sequential complaint numbers were deleted by the Access Services Information Technology department in order to avoid combining real complaints with system tests. All complaints that are either duplicated or entered incorrectly are voided out but remain recorded in the database. To ensure that there are no duplications of complaint numbers, and as a security measure, as of January 29, 2008, the current system and Rider 360 does not recycle unused complaint numbers or complaints used for system testing.

Follow-Up Review

We reviewed the "Customer Care Center Guidelines," and found that they incorporate the recommended actions. In addition, we reviewed the complaint database and found that the total number of complaints decreased by about 30% from 21,353 complaints in FY 2005 to 14,778 complaints in FY 2010, as shown in the chart below:

Chart 6 – Total Number of Complaints, FY 2005 – FY 2010

ASI Total Complaints

	FY 2005	FY 2006	FY 2007	FY 2008	FY 2009	FY 2010
TOTAL	21,353	16,253	16,815	16,315	13,914	14,778
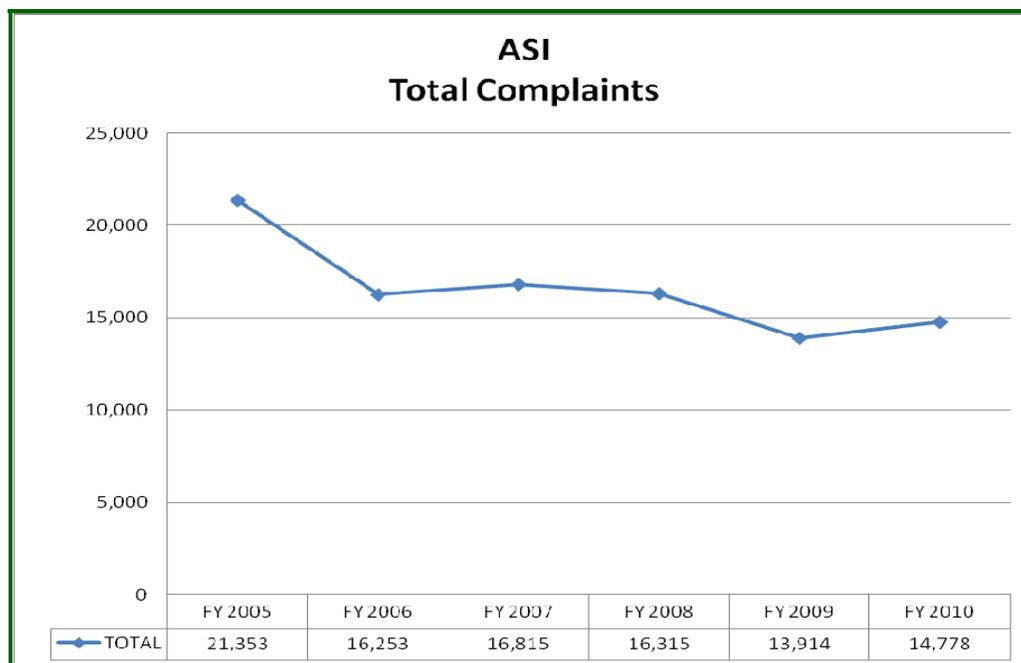
Details of Follow-Up Review of Prior Audit

At the time of our prior audit, Access Services included 7 categories of complaints in the performance measure "Service Complaints per 1,000 trips." These included ADA Violations, Service Animal Issues, Booking, and 4 categories of Late Arrival of the access Van to pick-up riders. In implementing our recommendation in the prior audit, Access Services included 7 additional complaint categories in the calculation of the service complaints: Conduct, Discourtesy, Routing, Service, Travel Time, Urgent, and Vehicle. We analyzed the trend for the 14 complaint categories discussed above. We found that from FY 2005 to FY 2010 the number of complaints decreased for nine of the categories, increased slightly for two categories (Service and Animals, and stayed about the same for three categories, as shown in the chart below:

Chart 7 – Total Number of Complaints for Selected Categories
FY 2005 – FY 2010

Total Number of Complaints for Selected Categories

	FY 2005	FY 2006	FY 2007	FY 2008	FY 2009	FY 2010
ADA	192	193	99	52	32	14
Animal	11	6	21	28	21	23
Booking	2,004	1,532	1,683	1,684	1,398	1,387
Conduct	1,772	1,452	1,755	1,249	681	805
Discourtesy	1,578	1,207	1,128	1,804	1,763	1,149
Late1	419	357	364	344	338	427
Late2	852	602	656	610	515	522
Late3	916	484	473	418	313	260
Late4	8,161	4,899	4,574	4,224	2,723	2,286
Routing	419	483	721	806	489	441
Service	1,291	1,106	888	684	1,769	2,228
TravelTime	507	439	803	777	766	557
Urgent	266	285	300	271	364	0
Vehicle	173	176	214	231	127	99

Details of Follow-Up Review of Prior Audit

Recommendation 13 (Completed)

To improve its management and oversight of paratransit service providers, we recommend that Access Services a) require all paratransit service providers to perform driver performance evaluations annually and maintain the evaluations in the driver personnel file for periodic Access Services review, and b) develop a standard driver code of conduct and require each driver to sign and agree to such conduct.

Access Services Actions

Access Services initiated the following actions to complete the implementation of the recommendation:

➢ Access Services required that an annual driver performance evaluation be maintained in each driver's training record in the most recent transportation service provider scope of work.

➢ A Drivers' Code of Conduct was developed (modeled after Metro's Operator's Code of Conduct) and delivered to contractors on May 1 2008, for distribution to drivers; it can be viewed on the Access Services website.

➢ All contractors have agreed to implement an annual driver performance evaluation beginning in July of 2008.

Follow-Up Review

We reviewed the contracts for the service providers and determined that the requirement to perform annual driver evaluations was incorporated into the contracts, or the contracts were amended. In addition, Access Services developed a Drivers' Code of Conduct (see the discussion under recommendation 10).

Details of Follow-Up Review of Prior Audit

Recommendation 14 (Completed)

Access Services management should increase its monitoring of average daily phone hold times to ensure compliance with the contractual performance requirement. Increased monitoring should identify the reasons why there are certain instances when daily phone hold times per hour exceed 4 minutes.

Access Services Actions

The audit recommendations were based upon operating statistics from fiscal year 2007. Average initial hold times for telephone trip reservations after the audit period had dropped considerably and have been less than 1 minute for the last year.

Follow-Up Review

We reviewed the average hold times for calls to schedule rides for the past 5 Fiscal Years, and determined that the average hold times decreased by 77% since the prior audit from 3.63 minutes in FY 2006 to 0.82 minute in FY 2010. The decrease in hold times was primarily a result of setting more stringent hold time standards (from a 4-minute to a 2-minute standard); and initialing an incentive and liquidated damages program for the providers, which rewarded/penalized them for hold time performance.

Chart 8 – Average Call Hold Time
FY 2005 – FY 2010

	FY 2006	FY 2007	FY 2008	FY 2009	FY 2010
Average Hold Time (Min)	3.63	2.55	0.68	0.63	0.82
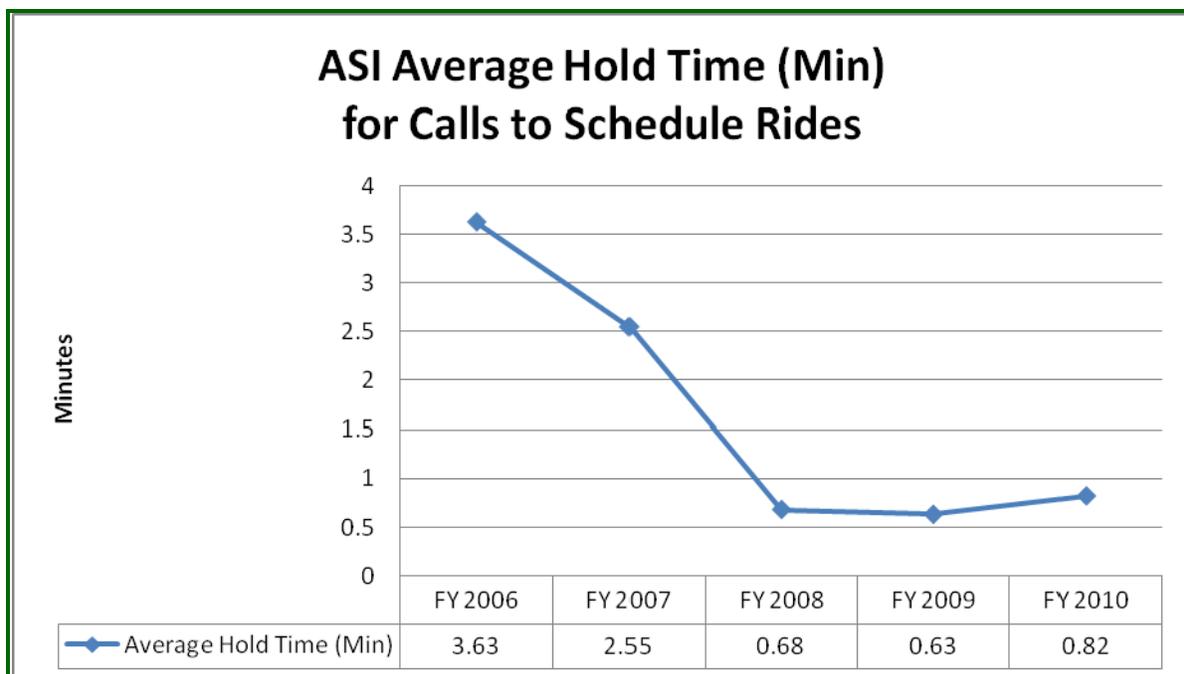
Details of Follow-Up Review of Prior Audit

Recommendation 15 (Completed)

Access Services should consider requesting that back-up providers submit their invoices semi-monthly to be consistent with other paratransit providers. Access Services then will be able to concurrently review invoices and supporting documentation from both paratransit providers and back-up providers to determine if payments due are for actual services.

Access Services Actions

Access Services has requested back-up providers to submit invoices semi-monthly. However, various individual taxi drivers, who submit individual trip data to small taxi providers, cannot comply with the request.

Follow-Up Review

We found that the largest back-up service provider now submits invoices semi-monthly. This provider performs 57% of the back-up trips. On October 14, 2010, the Chief Operations Officer told us that:

> "There were 4,320 backup trips in FY 09/10 (about 0.2% of total annual trips), 2,437 trips of the 4,320 trips were performed by MV Transportation (Overflow service) they now submit invoices semi-monthly. The remaining 1,883 trips were done by various individual taxi drivers who submit individual trip data to small taxi providers that are required to submit invoices monthly. If we request all these small backup providers to submit invoices semi-monthly, this will not only decrease the efficiency on the audit group but also increase the administrative burden on these small backup providers to turn in a couple of trip invoices."

Recommendation 16 (Completed)

We recommend that the Accounting Manual, General Accounting Desk Manuals, and other accounting policies and procedures be approved by Access Services Senior Management. In addition, the effective dates of the Accounting Manual, General Accounting Desk Manuals, and other accounting policies and procedures should be properly determined. Furthermore, the pages of these accounting documents should be properly numbered and cross-referenced. For accounting procedures that are still in handwritten editing mode, Access Services should finalize the procedures as soon as possible.

Access Services Actions

Access Services updated the Accounting Manual and General Accounting Desk Manuals, which have been approved by Senior Access Services Management. Each Manual includes an effective date and is properly numbered and cross referenced.

Details of Follow-Up Review of Prior Audit

Follow-Up Review

We reviewed Access Services' new Accounting Manual and General Accounting Desk Manuals. We determined that these procedures had been properly finalized and approved by the Executive Director on April 9, 2008.

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