

# STATUS REPORT ON THE IMPLEMENTATION OF METRO OFFICE OF INSPECTOR GENERAL (OIG) FY 07 - 08 AUDIT RECOMMENDATIONS

## Recommendation 1 - CLOSED in July 2008

ASI 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.

Apr - 08	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 requires a change in the adopted Paratransit Plan Update. The proposed revision will be presented to the Transportation Professionals Advisory Committee (TPAC) on April 10, 2008 and the Quality Services Subcommittee (QSS) on April 17, 2008. A public hearing has been scheduled for April 22, 2008. The Community Advisory Committee (CAC) will discuss the revision at their May 13, 2008 meeting and member agencies will provide their input via electronic mail during the month of May. The final approval for the revision will be placed on the May 19, 2008 Board of Directors Agenda. Assuming Board approval, the revision will be implemented on July 1, 2008.
May - 08	Staff prepared a recommendation for the Board to approve an updated to the Coordinated ADA Paratransit Plan specifying changes to the recertification process, which address Recommendation 1. If approved, the changes will be effective July 1, 2008.
June - 08	At the regular ASI Board of Directors 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. The updated Plan will be mailed to FTA in June 2008.
July - 08	The revised recertification process has been implemented. This item is now considered to be closed.

## Recommendation 2 - CLOSED in September 2008

ASI 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 ASI can offer more evaluation locations through the use of mobile evaluation units.

Apr - 08	All of the narrative comments from the surveys have been organized into categories of service. ASI staff is in the process of reviewing the comments to identify areas of concern. The narrative comments will be presented at the May 2008 QSS meeting. Any potential recommendations will be forwarded to the
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	CAC and TPAC prior to being presented to the Board of Directors for approval.
May - 08	Narrative comments from the eligibility survey were placed on the May QSS meeting agenda.
June - 08	QSS reviewed the narrative comments at the May QSS meeting and the top concerns raised in the survey will be used as a blueprint for discussion at future meetings.
July - 08	QSS will review the narrative comments from the eligibility survey in August 2008 and include them in the prioritization discussion topics established in July 2008. Any recommendations will be presented to the CAC as appropriate.
Aug - 08	The narrative comments on eligibility were presented to QSS at the August 2008 meeting. Due to a full agenda the committee tabled the item until the September 2008 meeting.
Sept - 08	In September 2008, the QSS prioritized the narrative comments from the eligibility survey and added these comments to their current list of comments from the rider survey to be discussed at future meetings. Any recommendations will be presented to the CAC as appropriate.

### **Recommendation 3**

**ASI 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.**

Apr - 08	ASI will re-evaluate the eligibility determination 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. Staff is anticipating a new brochure to be available in July of 2008.
May - 08	ASI will work with communications professionals and small focus groups to re-evaluate the eligibility determination packet. This will be implemented in July 2008.
Jun - 08	No update to report.
July - 08	On July 17, 2008, the QSS reviewed recommended changes to the eligibility fact sheets. New information sheets detailing the eligibility and appeal process are being formatted by Metro Design Center and will be available in September 2008. Per ASI Policy, alternative accessible formats will be available upon request.
Aug - 08	The formatted fact sheets are expected to be ready for distribution in the near future.

Feb -08	The Board of Directors approved a new identity program for Access Paratransit at their February 2009 meeting. Metro Design Center will begin work on finalizing these new information sheets. The new sheets are expected to be distributed in April 2009.
May -09	The eligibility and appeal information sheets consisted of four different parts. The four parts have been condensed and simplified into one user friendly document. Metro Design is currently finalizing the language and the layout. It is expected that the finalized document will be distributed in the Summer of 2009.
Aug - 09	The final proof of the new eligibility information guide was completed in early August 2009. After the final layout changes have been completed the guide will be sent to print.

**Recommendation 4 - CLOSED in July 2008**

**ASI 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.**

Apr - 08	ASI will continue to evaluate the eligibility processes and policies used in Los Angeles County. ASI will continue to monitor the best practices used in the industry by participating in various forums and seeking out documents and reports published by organizations such as, but not limited to, Easter Seals Project Action, Transportation Research Board Synthesis Studies, National Transit Institute, as well as from advocacy groups like the Disability Rights Education and Defense Fund. In addition, on a local level the eligibility contractor, under the new contract, will form a Community Council as an advisory group to provide feedback. ASI will be a part of that Council. This Council will begin in July 2008.
May - 08	No update to report.
Jun - 08	CARE held its first Customer Care Committee on Thursday June 29, 2008. The group had seven riders attend and discuss their experience with the evaluation process. CARE will use those comments to train staff and modify customer service procedures. The Committee will be meeting once a month.
July - 08	With the implementation of the revised recertification process and the opening of the new eligibility evaluation center in July, this item is now considered closed.

**Recommendation 5 - CLOSED in August 2008**

**ASI should review the narrative comments on the Rider Survey and initiate any**

**appropriate actions or changes.**

Apr - 08	All of the narrative comments from the surveys have been organized into categories of service. For instance, comments regarding the order taking process have all been grouped together. ASI staff is in the process of reviewing the comments to identify areas of concern. The narrative comments will be presented at the May 2008 meetings of the transportation service providers and the QSS. Any potential recommendations will be forwarded to the CAC and TPAC prior to being presented to the Board of Directors for approval.
May - 08	Narrative comments from the rider survey were placed on the May QSS meeting agenda, and the May Provider meeting agenda.
Jun - 08	In May 2008, 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.
July - 08	On July 17, 2008 QSS prioritized the narrative comments from the rider survey 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.
Aug -08	At the August 2008 QSS meeting, the committee began discussion on one of the four groups of comments. The committee has 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. This item is now considered closed.

**Recommendation 6**

**ASI 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.**

Apr - 08	Prior to the audit in January 2006, ASI retained the services of the IBI Group to perform a Needs Analysis on ASI's 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 implementation of a centralized reservation/scheduling software to be used by all of ASI providers. The Board approved the award for that reservation/scheduling software in November 2007. The first phase of the implementation of this recommendation is scheduled to begin in August 2008. The implementation of the first service region, with phase--in to other regions as contracts renew, is scheduled for fall of 2008.
May - 08	The centralized reservation/scheduling software will be implemented within the first service region in September 2008 and will be phased in by region as contracts are renewed. Staff is anticipating system wide implementation will be

	completed in 2010.
Jun - 08	A notice to proceed was issued to the software contractor on June 9, 2008 and a kick off meeting was held with Global Paratransit.
July - 08	The project team has begun the implementation period for the software installation in the Southern Region. As the system is implemented relevant ride statistics such as travel times, will be reported monthly in the Operations Report contained in the Board Box.
Aug - 08	No status update to report.
Feb - 09	Due to beta testing and related infrastructure issues the implementation of the new software has taken longer than expected. The first phase of implementation will begin in the Southern Region in Spring 2009.
May - 09	Implementation began in the Southern Region. The contractor is working to fine tune all of the scheduling parameters within the software and things are moving accordingly.
Aug - 09	The service quality in the Southern Region has stabilized. A modification of the software that's related to the scheduling of stand-by trips and pick-up times being changed has been completed and installed. The next region scheduled for implementation is MV Transit in the San Fernando Valley in early 2010.

**Recommendation 7 - CLOSED in July 2008**

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

Apr - 08	A draft of an Order Taker Code of Conduct is scheduled to be presented to the Transportation Service Providers at their meeting in May of 2008. Staff anticipates distribution of an Order Taker Code of Conduct in June of 2008.
May - 08	A draft of the Order Taker Code of Conduct was placed on the May Provider Meeting Agenda.
Jun - 08	The Order Taker Code of Conduct was reviewed at the Provider meeting in May. The Contractors will begin distribution and the document will be posted on the ASI website by June 23, 2008.
July - 08	The Order Taker Code of Conduct has been distributed and can be viewed on the ASI website. This item is now considered closed.

**Recommendation 8**

ASI 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.

See Recommendation 6 above.

**Recommendation 9 - CLOSED in July 2008**

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

Apr - 08	<p>ASI is in the process of redesigning new employee training tests for drivers, call takers, and dispatchers. Questions regarding call out procedures will be included in these tests. The driver, call taker, or dispatcher will be required to pass this test with a score of 90% or greater before they are allowed to work on the ASI contract. This test will be completed no later than July 2008.</p> <p>ASI Road Supervisors and Dispatch Coordinators monitor compliance with currently required continuous training for each contractor. The call-out procedures are a part of that training. Immediately, ASI will instruct the service providers to include this topic in the next rotation of training beginning in May 2008.</p>
May - 08	<p>Service providers were instructed to include "call out procedures" in the rotation of training beginning in May 2008.</p>
Jun - 08	<p>Providers are in the process of updating the tests and training materials.</p>
July - 08	<p>All materials have been updated and the new materials have been implemented. A copy of the revised test is available upon request. This item is now considered closed.</p>

**Recommendation 10 - CLOSED in May 2008**

ASI should reinforce to service provider contractors ASI's goal of providing courteous and quality service to clients. In this regard, ASI 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 ASI's commitment to quality service.

Apr - 08	<p>The Driver Code of Conduct will be distributed to all certified drivers by May 1, 2008. The Order Taker Code of Conduct is scheduled for distribution in June 2008.</p>
May - 08	<p>Driver Code of Conduct was delivered to contractors on May 1, for distribution to drivers; it can be viewed at <a href="http://www.asila.org">www.asila.org</a>. This item is now considered closed.</p>

## Recommendation 11

ASI 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.

Apr - 08	ASI will work with TPAC and CAC to ensure that information on eligibility is consistent with the recommendation and presented in a manner most likely to be understood by applicants. Staff is anticipating new brochures to be available in July of 2008.
May - 08	Staff is anticipating new brochures to be available in July of 2008.
Jun - 08	No update to report.
July - 08	In addition to the information sheets 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.
Aug - 08	See item 3 above.
Aug - 09	With the issuance of the new eligibility information guide this item will be closed.

## Recommendation 12 - CLOSED in April 2008

ASI 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.

- a) The Complaints and Customer Service departments have developed a procedures manual with input from the Complaints Process Modification Subcommittee of the CAC. The manual was completed in April 2008. This item is considered closed.
- b) As of January 12, 2008, formal training now includes Customer Service workshops, as well as follow up and refresher trainings, one-on-one review with all Customer Support Supervisors and management, side-by-side training, and review of completed procedures manual. The Complaint Specialists now attend regular monthly meetings to address any observations and/or needed training refreshers 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 procedural manual. This item is considered closed.
- 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. This item is considered closed.
- d) More intense trend analysis of complaints has been in place since January 29, 2008. New complaint procedures have freed up additional time so that staff can dedicate more of their resources to the analysis of information. This item is considered closed.
- e) The procedures manual has been completed. See item (a) above. This item is considered closed.
- f) Additional complaint categories have been added to the service complaints per 1,000: Animal, Booking, Conduct, Discourtesy, Routing, Service, Travel time, Urgent and Vehicle. These additional categories will be reflected in the April 2008 operations report to the Board of Directors.
- g) Sequential complaint numbers were deleted by ASI's 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. This item is considered closed.

**Recommendation 13 - CLOSED in July 2008**

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

Apr - 08	a) ASI required an annual driver performance evaluation to be maintained in the driver training record in the most recent transportation service
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	<p>provider scope of work. Staff is in the process of negotiating with our existing contractors in order to implement the recommended change system wide effective July 1, 2008.</p> <p>b) See recommendation 10 response.</p>
May - 08	<p>a) ongoing</p> <p>b) Driver Code of Conduct was delivered to contractors on May 1, for distribution to drivers; it can be viewed at <a href="http://www.asila.org">www.asila.org</a>. This item is now considered <b>closed</b>.</p>
Jun - 08	No update to report.
July - 08	All contractors have agreed to implement an annual driver performance evaluation beginning in July of 2008. This item is now considered closed.

#### Recommendation 14 - CLOSED in April 2008

ASI 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.

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

#### Recommendation 15 - CLOSED in April 2008

ASI should consider requesting that back-up providers submit their invoices semi-monthly to be consistent with other paratransit providers. ASI 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.

ASI has requested that back up providers submit invoices semi-monthly. The majority cannot comply with the request. This recommendation is considered closed.

#### Recommendation 16 - CLOSED in April 2008

We recommend that the Accounting Manual, General Accounting Desk Manuals, and other accounting policies and procedures be approved by ASI 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, ASI should finalize the procedures as soon as possible.

Updated Accounting Manual and General Accounting Desk Manuals have been approved by ASI Senior Management. Each Manual includes an effective date and is properly

numbered and cross referenced. Copies of these manuals are available upon request. This recommendation is considered closed.