

STATUS OF IMPLEMENTING DEPARTMENT OF AUDIT REPORT RECOMMENDATIONS

Audit Title: Milwaukee County Transit Plus On-Time Performance and Customer Satisfaction Generally are Good But Better Oversight of Vendor Complaint Resolution Efforts is Needed

File Number: 13-962

Department: Department of Transportation

Audit Date: December 2013

Status Report Date: October 2015

Number & Recommendation	Deadlines Established		Deadlines Achieved		Implementation Status		Comments
	Yes	No	Yes	No	Completed	Further Action Required	
1. Ensure Transit Plus program management reviews, on a sample basis, paratransit van service trips with travel times exceeding 60 minutes each month to determine compliance with ADA requirements for comparability with fixed-route service travel times. Reviews should be performed on a regular basis, include efforts to identify patterns, and could include soliciting input from affected clients when appropriate to explain extenuating circumstances. Such an effort could also reveal the need for Transit Plus to develop additional criteria for measuring excessive travel times in those instances where fixed-route comparisons are unrealistic.					X		Auditee: Transit Plus and the MCTS IT department devised reports to identify rides that exceed certain baseline durations by time and distance. These reports are run each month by Transit Plus staff, so that any patterns may be discovered and addressed. Transit Plus also consulted the guidelines from the Disability Rights Education Defense Fund on on-time performance in paratransit to help determine acceptable baselines. Guidance from DREDF indicates that 60 minutes is acceptable ride duration for a trip distance of 5 to 7 miles. Trips of less than 10 miles but greater than 120 minutes were also reviewed. Less than 1% of all trips fall into a category of excessive ride time. MCTS will continue to monitor compliance with this standard on an on-going basis.

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2. Ensure Transit Plus program management proactively monitors service providers' processes for recording and responding to clients' complaints. Efforts should include, but not be limited to: a. the identification of patterns of complaints; b. a cross-check for any complaints received directly by Transit Plus that mentions a prior contact with a provider to help ensure that providers are recording all client complaints, as required by contract; and c. Randomly spot-check provider complaint resolutions by contacting clients for feedback regarding the disposition of their specific complaints.					X		Auditee: MCTS created a new database tracking tool to provide reporting on client complaints that: a) Identifies patterns of complaints b) Cross-checks for complaints received directly by Transit Plus that have been received previously c) Allows for random sampling of complaints for disposition resolution follow up Utilizing these database tools allows Transit Plus staff to readily identify any emerging patterns and work proactively with the vendors to address the issues quickly. Vendors are required to log all complaints received by their staff which allows Transit Plus staff to cross check all complaints received. It is Transit Plus' practice that each complaint is followed up within 24 hours (excepting weekends and holidays where the next business day is acceptable.)
3. Ensure Transit Plus program management modifies its internal complaint database to improve the accuracy of data entry and to allow for automated filtering of such details as complaints by provider, by individual driver, by type of resolution, and time elapsed until resolution.					X		Auditee: MCTS tracking database implemented in 2014 supports automated filtering of details such as complaints by provider, type of complaint resolution and the time elapsed until resolution.

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4. Ensure Transit Plus program management develops and implements clear and concise policies and procedures for addressing and monitoring clients' complaints. The policies and procedures should address all complaints, including those submitted by clients to individual service providers, as well as those submitted directly to the Transit Plus program.					X		Auditee: Contracted carriers enter complaint data into database directly as of mid-June 2014.
5. Ensure Transit Plus program management includes in its next solicitation of paratransit van service proposals a requirement that vans are equipped with continuous surveillance cameras suitable for assisting in the investigations of disputed service complaints.					X		Auditee: As a requirement for the new contract effective 11/01/2015, contracted carriers will have continuous surveillance cameras capable of recording audio and video on all vehicles.

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6. Ensure Transit Plus program management convenes a workgroup including, but not limited to, Transit Plus staff, paratransit van service providers, the Milwaukee County Department of Transportation, the Milwaukee County Office of Persons with Disabilities, appropriate advocacy groups for persons with disabilities, and the Office of Corporation Counsel, to determine whether or not the Transit Plus program has appropriate policies, procedures and/or contract requirements in place regarding compliance with ADA wheelchair securement, wheelchair bound client restraints, and legally defensible service denial protocols regarding client safety concerns.					X		Auditee: A seminar on securement of both a manual wheel chair and a power scooter was presented by a national expert from QStraint to provide best practices protocols to a group consisting of Transit Plus staff, paratransit van service providers, the Milwaukee County Department of Transportation, the Milwaukee County Office of Persons with Disabilities, appropriate advocacy groups for persons with disabilities, and the Office of Corporation Counsel on 09/23/2014.
7. Ensure Transit Plus program management implements a structured management oversight approach to help ensure consistent eligibility determination decision-making among assessors.					X		Auditee: A methodology for tracking the assessment process is in place and has been documented. Structured management and oversight of the decision making process helps ensure consistency among assessors. MCTS' IT Department has developed reports which sort by multiple fields. Assessors can be compared across time on various eligibility categories. Assessors follow ADA guidelines, as well as DREDF and NTI-Easter Seals best practices. Transit Plus has additionally been working with the UWM School of Physical Therapy to explore quantifiable, objective testing methods for ADA paratransit.

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8. Ensure Transit Plus program management seeks an integrated solution to eliminate the need for manual entry of the same information into two automated systems at the earliest strategic opportunity.					X		Auditee: Transit Plus and the MCTS MIS Department devised a solution to reduce duplicate data entry and minimize data error potential by further integrating and automating data sharing between Trapeze client files and Oracle. This was effected in March 2014.
9. Ensure Transit Plus program management works with the Transit Plus Advisory Council and the Milwaukee County Director of Transportation to re-establish the pattern of appointing TPAC members to two-year terms on a staggered basis such that approximately half of the council is up for appointment each year.					X		Auditee: Transit Plus and TPAC established a two year term for all TPAC members, with the Milwaukee County Director of Transportation approving the member terms. Effected May 14, 2014.