




June 10, 2015

To: Finance and Administration Committee
From: Darrell Johnson, Chief Executive Officer

Janet Sutter, Executive Director 
Internal Audit

Subject: Review of the ACCESS Eligibility Process and Agreement No. C-0-1937 with C.A.R.E. Evaluators, LLC

Overview

The Internal Audit Department has completed a review of the ACCESS eligibility process and Agreement No. C-0-1937 with C.A.R.E. Evaluators, LLC. Based on the review, controls over the eligibility process are adequate; however, the Internal Audit Department has made recommendations to improve monitoring of contract compliance related to staffing and data security.

Recommendation

Direct staff to implement recommendations provided in the Review of the ACCESS Eligibility Process and Agreement No. C-0-1937 with C.A.R.E. Evaluators, LLC, Internal Audit Report No. 15-509.

Background

ACCESS is the Orange County Transportation Authority's (OCTA) shared ride service for people who are unable to use the regular, fixed-route service because of functional limitations caused by a disability. These passengers must be certified by OCTA to use the ACCESS system by meeting Americans with Disabilities Act eligibility criteria.

OCTA contracts with C.A.R.E. Evaluators, LLC (C.A.R.E.) under Agreement No. C-0-1937 (Agreement) to conduct in-person assessments and to provide paratransit eligibility determinations for all ACCESS service applicants. Staff from the Community Transportation Services Department, within the Transit

Division, is responsible for oversight of the eligibility process and for management of the agreement with C.A.R.E.

Discussion

C.A.R.E. maintains sensitive, personal information on OCTA ACCESS service applicants; however, the agreement with C.A.R.E. does not reference current OCTA data security standards, and project management does not periodically assess the adequacy of data security measures employed by C.A.R.E. Also, C.A.R.E. management does not periodically review system access rights to ensure appropriateness. The Internal Audit Department (Internal Audit) recommended that management update the agreement and periodically review and assess C.A.R.E.'s data security measures and oversight of access rights. Management agreed and indicated that the agreement would be amended, a process for annual review of data security measures would be implemented, and evidence of periodic system access rights reviews would be provided with monthly invoices going forward.

In addition, Internal Audit noted that C.A.R.E. does not have on staff an orientation and mobility specialist or a psychiatrist, as required by the agreement. According to both OCTA and C.A.R.E. management, these specialists are not provided because it is not cost effective to retain these specialists on staff. Internal Audit recommended that management either enforce staffing requirements outlined in the agreement or amend the agreement to reflect current requirements. Management agreed and indicated that the agreement would be amended.

Summary

Internal Audit has completed a review of the ACCESS eligibility process and Agreement No. C-0-1937 with C.A.R.E. Evaluators, LLC, and is recommending improvements in monitoring of contract compliance related to provision of staff and data security.

Attachment

- A. Review of the ACCESS Eligibility Process and Agreement No. C-0-1937 with C.A.R.E. Evaluators, LLC, Internal Audit Report No. 15-509

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Approved by:



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