

# OFFICE OF THE STATE AUDITOR

# DIANA DIZOGLIO

Official Audit Report – Issued June 7, 2023

## Lowell Regional Transit Authority

For the period October 1, 2019 through September 30, 2021



OFFICE OF THE STATE AUDITOR  
**DIANA DIZOGLIO**

June 7, 2023

David Bradley, Administrator  
Lowell Regional Transit Authority  
115 Thorndike Street  
Lowell, MA 01852

Dear Mr. Bradley:

I am pleased to provide to you the results of the enclosed performance audit of the Lowell Regional Transit Authority. As is typically the case, this report details the audit objectives, scope, methodology, findings, and recommendations for the audit period, October 1, 2019 through September 30, 2021. As you know, my audit team discussed the contents of this report with agency managers. This report reflects those comments.

I appreciate you and all your efforts at the Lowell Regional Transit Authority. The cooperation and assistance provided to my staff during the audit went a long way toward a smooth process. Thank you for encouraging and making available your team. I am available to discuss this audit if you or your team have any questions.

Sincerely,



Diana DiZoglio  
Auditor of the Commonwealth

cc: Gina Fiandaca, Secretary of the Massachusetts Department of Transportation  
Thomas Bomil, Advisory Board Chair of the Lowell Regional Transit Authority

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## EXECUTIVE SUMMARY

In accordance with Section 12 of Chapter 11 of the Massachusetts General Laws, the Office of the State Auditor has conducted a performance audit of the Lowell Regional Transit Authority (LRTA). In this performance audit, we determined whether LRTA delivered on-time paratransit services required by the Americans with Disabilities Act (ADA) in accordance with its “Road Runner Standard Operating Procedures,” and its contract with MV Transportation. We also assessed whether LRTA ensured that ADA paratransit complaints were processed in accordance with its “Road Runner Standard Operating Procedures” and Section 27.13(b) of Title 49 of the Code of Federal Regulations.

Below is a summary of our findings and recommendations, with links to each page listed.

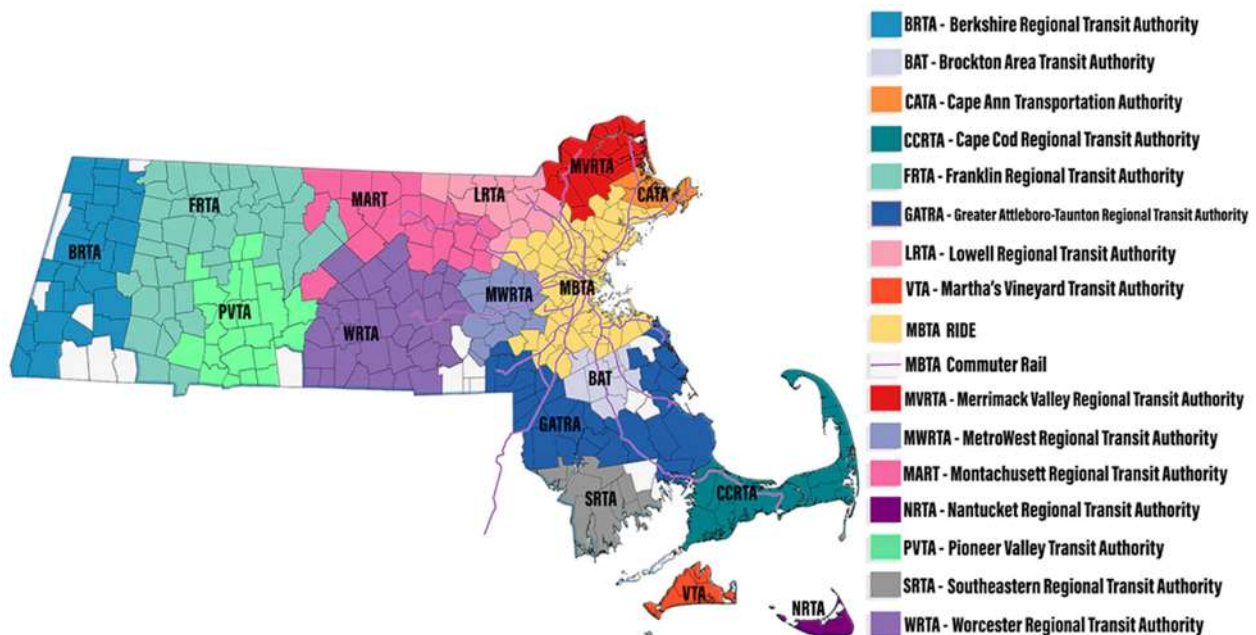
<b>Finding 1</b> <b>Page <a href="#">9</a></b>	LRTA did not identify minimum on-time performance standards and measures for, or verify the accuracy of reports provided by, its paratransit management contractor.
<b>Recommendations</b> <b>Page <a href="#">10</a></b>	<ol style="list-style-type: none"><li>1. LRTA should ensure that its paratransit management contracts include performance surety language and minimum on time performance standards and measures. It should also develop a policy to include this information in its contracts.</li><li>2. LRTA should implement monitoring controls to ensure that its employees verify that ADA-required paratransit ride information provided by MV Transportation is complete and accurate.</li></ol>
<b>Finding 2</b> <b>Page <a href="#">11</a></b>	LRTA did not comply with accessibility requirements, or follow required procedures, for ADA paratransit complaints.
<b>Recommendations</b> <b>Page <a href="#">13</a></b>	<ol style="list-style-type: none"><li>1. LRTA should update its website to include the process for filing an ADA paratransit complaint.</li><li>2. LRTA should update its website to include the name, address, telephone number, and email address of the designated LRTA employee responsible for overseeing MV Transportation’s administration of the ADA paratransit complaint process.</li><li>3. LRTA should ensure that MV Transportation fills out a complaint form for each ADA paratransit complaint received.</li><li>4. LRTA should implement a complaint log (manual or electronic) that includes the date each complaint was received and a complaint identification number to ensure that MV Transportation records all complaints it receives for LRTA.</li><li>5. LRTA should ensure that complainants receive acknowledgements of their complaints within two business days.</li></ol>

## OVERVIEW OF AUDITED ENTITY

### Massachusetts Regional Transit Authorities

Chapter 161B of the Massachusetts General Laws established regional transit authorities (RTAs) and defined the roles and responsibilities for these authorities, the municipalities in which they operate, and the Commonwealth. According to Chapter 161B of the General Laws, RTAs are controlled by the municipalities in which they operate. Each RTA is governed by an advisory board composed of elected officials from the community (e.g., city manager or mayor), as well as one representative of the disabled commuter population<sup>1</sup> and one representative of the local rider community. The advisory boards appoint administrators, establish bylaws, and approve budgets and changes to RTA services.

Section 53 of Chapter 6C of the General Laws makes the Rail and Transit Division of the Massachusetts Department of Transportation “responsible for overseeing, coordinating and planning all transit and rail matters throughout the commonwealth,” including intercity buses, the Massachusetts Bay Transportation Authority, and RTAs.



Source: Massachusetts Department of Transportation—Rail and Transit Division (<https://www.mass.gov/info-details/public-transportation-in-massachusetts>)

1. According to Section 5 of Chapter 161B of the General Laws, “This representative shall be mobility impaired, have a family member who is mobility impaired, be a caretaker of a person who is mobility impaired or work for an organization that serves the needs of the physically disabled.”

Currently, there is a network of 15 RTAs operating in the Commonwealth, in addition to the transit services provided by the Massachusetts Bay Transportation Authority. These RTAs serve a total of 272 cities and towns outside the greater Boston area. RTAs are funded through a combination of state appropriations, federal grants, local governments, fares, and other sources. State appropriations for the 15 RTAs increased from approximately \$80 million in fiscal year 2018 to approximately \$94 million in fiscal years 2021 and 2022.

### **Americans with Disabilities Act—Complementary Paratransit Service**

The Americans with Disabilities Act (ADA) of 1990 recognized that some individuals' disabilities prevent them from using a fixed-route<sup>2</sup> transit system. Section 37(F) of Title 49 of the Code of Federal Regulations, which covers the transportation and related stipulations of ADA, states,

*Each public entity operating a fixed route system shall provide paratransit or other special service to individuals with disabilities that is comparable to the level of service provided to individuals without disabilities who use the fixed route system.*

The above regulation also establishes minimum levels of service that RTAs must provide for complementary paratransit services.

### **Lowell Regional Transit Authority**

The Lowell Regional Transit Authority (LRTA) was established in 1976, in accordance with Chapter 161B of the General Laws, to oversee and coordinate public transportation within the Lowell area and reports to the Rail and Transit Division under Chapter 25 of the Acts of 2009.

According to LRTA's website, its mission is "to provide convenient, comfortable, safe, reliable, cost-effective mobility services contributing to the economic vitality of the region."

An advisory board oversees LRTA's operations. LRTA's administrator, hired by the advisory board, is responsible for day-to-day administration of the agency. LRTA has a network of 19 local fixed-route bus services, 11 routes in Lowell and 8 suburban routes. The local fixed-route bus service operates six days a week. LRTA provides transportation services to 14 cities and towns of greater Lowell: Acton, Billerica,

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2. Fixed-route transportation services or transit systems have established routes, schedules, and stops.

Carlisle, Chelmsford, Dracut, Dunstable, Groton, Lowell, Maynard, Pepperell, Tewksbury, Townsend, Tyngsborough, and Westford.

LRTA contracted with First Transit Management of Lowell, Inc, a privately operated company, to provide transit management and operation services for its fixed-route bus services during our audit period. LRTA entered into a contract with MV Transportation on May 31, 2019 to manage and operate Road Runner transportation services<sup>3</sup> for ADA-required paratransit and demand response<sup>4</sup> transportation services. All ADA-required paratransit and demand response services provided during the audit period were administered using a transportation software called RouteMatch.

MV Transportation employees record ride data in the RouteMatch system electronically through tablets or manually from the daily driver manifests. Each month, MV Transportation generates monthly summary performance reports and submits these to LRTA. This summary ride data includes early, on-time, and late trip performance percentage totals, which the LRTA administrator compares to LRTA performance goals. LRTA includes the performance information in monthly reports to both the Federal Transit Authority and Massachusetts Department of Transportation.

## **ADA Paratransit Complaints**

ADA paratransit complaints are complaints related to ADA-required paratransit services. According to Section 27.13 of Title 49 of the Code of Federal Regulations, transportation programs that receive federal funding must adopt complaint procedures and designate a responsible employee to coordinate these procedures.

ADA paratransit complaints, submitted by riders, can be made by phone, mail, email, or in person at the paratransit office. MV Transportation's paratransit general manager or paratransit operations manager documents the complaint on a complaint form. The paratransit general manager has two days to investigate the complaint, determine whether the complaint warrants further action, and report the findings to the complainant. If a complaint warrants further action, the employee or driver receives training and/or appropriate discipline as determined by the paratransit general manager. The MV

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3. Road Runner transportation services include ADA-required paratransit services for individuals with disabilities who are unable to ride LRTA's fixed-route buses and Senior Dial-A-Ride services for residents within the LRTA service area who are 60 years of age or older.
  4. Demand response transportation services are non-fixed route services that must be requested by riders and scheduled by dispatchers through a transportation service.

Transportation paratransit general manager tracks complaints monthly by category and reports complaint totals to the LRTA administrator on the monthly performance report.

## LRTA Paratransit Ridership Information

The table below summarizes LRTA's paratransit information for fiscal years 2019, 2020, and 2021.

	Fiscal Year 2019	Fiscal Year 2020	Fiscal Year 2021
Number of Active Riders	4,638	3,548	2,619
Number of Trips	51,291	39,266	31,466
Number of Miles	312,630	254,161	209,222
Number of Drivers	10	8	7
Number of Vehicles Used	13	11	9

## LRTA Funding Sources

In fiscal years 2019, 2020, and 2021, LRTA received revenue from a variety of sources, including federal, state, and local assistance. The table below shows the types of funding LRTA received during fiscal years 2019, 2020, and 2021.

Type of Funding	Fiscal Year 2019	Fiscal Year 2020	Fiscal Year 2021
State Assistance	\$ 3,608,306	\$ 3,828,326	\$ 4,039,189
Local Assistance	2,931,945	3,005,244	3,005,244
Federal Assistance	2,738,871	3,132,447	4,306,181
Fixed-Route Income	1,324,536	996,214	460,288
Paratransit Income	144,179	104,361	68,790
Terminal Revenue	1,363,559	1,161,362	278,234
Other Income*	302,873	507,435	77,683
Other Transit Service**	0	0	348,424
Total	<u>\$12,414,269</u>	<u>\$12,735,389</u>	<u>\$12,584,033</u>

\* Other income is from advertising, interest, and miscellaneous sources.

\*\* Other transit service revenue is from a Sunday transportation service pilot program.



## AUDIT OBJECTIVES, SCOPE, AND METHODOLOGY

In accordance with Section 12 of Chapter 11 of the Massachusetts General Laws, the Office of the State Auditor has conducted a performance audit of certain activities of the Lowell Regional Transit Authority (LRTA) for the period October 1, 2019 through September 30, 2021.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Below is a list of our audit objectives, indicating each question we intended our audit to answer; the conclusion we reached regarding each objective; and, if applicable, where each objective is discussed in the audit findings.

Objective	Conclusion
1. Does LRTA ensure that paratransit services required by the Americans with Disabilities Act (ADA) are provided on time in accordance with its "Road Runner Standard Operating Procedures" and its contract with MV Transportation?	<b>Yes; however, see Finding <u>1</u></b>
2. Does LRTA ensure that all complaints from ADA-required paratransit riders are investigated and responded to as required by Section 27.13(b) of Title 49 of the Code of Federal Regulations and LRTA's "Road Runner Standard Operating Procedures"?	<b>No; see Finding <u>2</u></b>

To achieve our objectives, we gained an understanding of the internal controls related to the objectives by reviewing applicable policies and procedures, as well as conducting interviews with LRTA and MV Transportation officials. We evaluated the design of controls over LRTA's process for providing on-time ADA-required paratransit services and investigating and responding to ADA paratransit complaints. We performed the following procedures to obtain sufficient, appropriate evidence to address the audit objectives.

### On-Time Performance

- To determine whether LRTA delivered ADA-required paratransit services on time in accordance with LRTA's "Road Runner Standard Operating Procedure" and its contract with MV Transportation, we analyzed 100% of the 62,503 ADA-required paratransit trips performed during the audit period.

- We assessed the rate of on-time performance by comparing actual pickup and negotiated pickup times<sup>5</sup> for each trip to calculate the number of early, on-time, and late trips.
- To assess excessively long on-board passenger trips, we selected a nonstatistical, random sample of 88 of 1,088 trips that exceeded 60 minutes from the ride data received from the RouteMatch system. We reviewed this sample of ride data to determine whether the trip met the LRTA performance metric (as noted in its “Road Runner Standard Operating Procedures”) not to exceed 60 minutes in trip length within one city and 90 minutes within two cities, based on the pick-up and drop-off cities. We then reviewed all 77 of the 1,088 trips where the trip length exceeded 90 minutes for the accuracy of recorded trip times.
- To assess whether LRTA monitored paratransit contractor performance, we obtained and reviewed the MV Transportation paratransit contract for scope of work, on-time performance standard measures, and monthly performance reporting requirements. We also discussed with LRTA administrative employees whether they conducted verifications of monthly performance reports.

## **ADA Paratransit Complaints**

- To determine whether the ADA paratransit complaint process is advertised to the public and accessible by individuals with disabilities, we interviewed the LRTA administrator and reviewed the LRTA website for the name, address, telephone number, and email address of the employee designated to receive the complaints.
- To determine whether LRTA investigated and responded promptly to ADA paratransit complaints in compliance with Section 27.13(b) of Title 49 of the Code of Federal Regulations and LRTA’s “Road Runner Standard Operating Procedures,” we reviewed all six complaints received during the audit period. We reviewed the complaint data maintained by the MV Transportation general manager to determine whether the individual who received the initial complaint report completed the complaint forms, whether complaints were listed on a tracking report, whether the MV Transportation paratransit general manager or operations manager conducted complaint investigations promptly, whether the MV Transportation paratransit general manager or operations manager documented whether a complaint warranted further action, whether complainants received a response upon conclusion of the investigation, and whether the MV Transportation paratransit general manager included the complaint in the monthly performance report to LRTA.

We used nonstatistical sampling and, therefore, could not project the results of our testing to the overall population.

## **Data Reliability Assessment**

To assess the reliability of ride data from the RouteMatch system, we interviewed LRTA’s information technology manager and MV Transportation employees responsible for oversight of the system and its

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5. The negotiated pickup time is the time arranged between the reservationist and the rider.

data. We reviewed LRTA's information technology policies for the following areas: access controls, security awareness and training, audit and accountability, identification and authentication, and personnel security policies.

In addition, we selected a random sample of 20 applications for ADA-required paratransit service eligibility and traced the information on the application to the RouteMatch system to verify the rider's name, address, identification number, and ADA-required paratransit eligibility status. Further, we selected a random sample of 20 ADA-required paratransit riders during the audit period from the RouteMatch data and confirmed their names, addresses, identification number, and ADA-required paratransit eligibility statuses with their ADA-required paratransit rider applications.

Based on the results of the data reliability procedures above, we determined that the data were sufficiently reliable for the purposes of this audit.

## DETAILED AUDIT FINDINGS WITH AUDITEE'S RESPONSE

### **1. The Lowell Regional Transit Authority did not identify minimum on-time performance standards and measures for, or verify the accuracy of reports provided by, its paratransit management contractor.**

The Lowell Regional Transit Authority's (LRTA's) contract with MV Transportation did not identify minimum on-time performance standards and measures, and LRTA did not verify the accuracy of MV Transportation's monthly Performance Measure Reports.

Although LRTA's "Road Runner Standard Operating Procedures" states an on-time performance goal of 94% and management stated that LRTA's minimum performance goal was 90%, our review of LRTA's contract with MV Transportation determined that the contract does not contain specific on-time performance standards and measures.

As part of our audit, we requested the ride data for all paratransit rides required by the Americans with Disabilities Act (ADA) during the audit period. Neither LRTA nor MV Transportation could provide the requested ride data. We subsequently obtained the requested data from the LRTA's paratransit software provider, RouteMatch.

LRTA management noted that they receive Monthly Performance Measure Reports from MV Transportation and meet with MV Transportation staff members to discuss these reports each month. We interviewed LRTA officials about how they verified the on time performance percentages included in the report. LRTA advised that they relied on MV Transportation to provide accurate information in their Monthly Performance Measure Reports.

As a result of LRTA not including minimum on-time performance standards and measures in its contract with, or verifying ride data in reports provided by, MV Transportation, LRTA cannot ensure that ADA-required paratransit services provided are adequate and timely and reports provided to state and federal authorities are accurate.

### **Authoritative Guidance**

According to Section 37.23(a) of Title 49 of the Code of Federal Regulations,

*When a public entity enters into a contractual or other arrangement . . . or relationship with a private entity to operate fixed route or demand responsive service, the public entity shall ensure*

*that the private entity meets the requirements of this part that would apply to the public entity if the public entity itself provided the service.*

The Records and Reports section of LRTA's Request for Proposals for Paratransit Management Services states,

*The Contractor will be responsible for properly maintaining separate records and summaries for this service. In addition the contractor will be responsible for maintaining records required by [the Federal Transportation Administration] National Transit Data Base . . . and any and all other applicable federal, state or local requirements.*

## **Reasons for Issue**

LRTA does not have a policy to include minimum on-time performance standards and measures in its paratransit management contracts.

Additionally, LRTA has not implemented monitoring controls to ensure that its employees verify that ADA-required paratransit ride information provided by MV Transportation is complete and accurate.

## **Recommendations**

1. LRTA should ensure that its paratransit management contracts include performance surety language and minimum on-time performance standards and measures. It should also develop a policy to include this information in its contracts.
2. LRTA should implement monitoring controls to ensure that its employees verify that ADA-required paratransit ride information provided by MV Transportation is complete and accurate.

## **Auditee's Response**

*Currently, LRTA's Paratransit Management Contract with MV Transportation states "The selected Contractor will be responsible for meeting all requirements as specified in the contract including, but not limited to, employee standards and training, labor & contract negotiations, vehicle maintenance, safety, on-time performance, reporting, billing, appropriate licensing, all other legal requirements, as well as full compliance with all applicable ADA requirements." The Contract also states "The LRTA reserves the right to cancel any contract resulting from this procurement for cause by written notice to the Contractor. Cause for cancellation will be documented failure(s) of the Contractor to provide services in the quantity and/or quality required. Notice of such cancellation will be given with sufficient time to allow for the orderly withdrawal of the Contractor without additional harm to the participants or the LRTA."*

*Per the Auditor's recommendation, the LRTA will review its upcoming Paratransit Management Services [Request for Proposals]/Contract to strengthen the performance surety language to include specific on time performance standards and measures.*

*To verify the accuracy of reports, the LRTA meets with its Paratransit Management Contractor monthly to review service performance, financials, safety, and operating reports. The LRTA also meets quarterly with representatives from the ADA community in the LRTA service area.*

*Per the Auditor's recommendation, the LRTA has implemented additional data validation processes. As part of the monthly contractor review, LRTA randomly selects a trip date and driver to review the corresponding manifest and Routematch verification report for accuracy. In addition, in the rare instance when there is a tablet outage and the driver has to manually report their pick up/drop off times, the dispatchers report this as part of the Daily Operations . . . report. The Operations Manager manually enters the driver data into the Routematch system and keeps the driver's record for the file. As part of the monthly contractor review, if there are any periods during the month with a tablet outage, the LRTA will select an additional trip date and driver during the outage period to validate the Routematch Verification report against the driver's manual record.*

## **Auditor's Reply**

Based on the response above, LRTA is taking measures to address our concerns.

## **2. LRTA did not comply with accessibility requirements, or follow required procedures, for ADA paratransit complaints.**

LRTA did not (1) ensure that it publicly advertised its ADA paratransit complaint process, (2) maintain a complaint log and ensure that MV Transportation processed paratransit complaints, and (3) ensure that MV Transportation filled out complaint forms.

We noted in our review of the LRTA website that it does not state the process to file a complaint. Although the website lists MV Transportation's email address and telephone number to contact regarding ADA-required paratransit services, the process to file complaints is not specifically identified.

We reviewed the six complaints, and related complaint forms, received during the audit period and noted the following:

- One complaint form was not filled out by the MV Transportation employee receiving the complaint.
- LRTA did not maintain a complaint log to track all the complaints MV Transportation received on its behalf.
- No complaint forms had a resolution date recorded on them.
- Four complaint forms had no evidence of response to the complainant.

Instead of documenting the complaint on a complaint form when they receive them, MV Transportation dispatchers, reservationists, or drivers forward complaints either verbally or through emails to MV Transportation's paratransit general manager or operations manager, who fills out the complaint forms and conducts investigations.

If LRTA does not properly advertise the complaint process publicly, ADA-required paratransit riders may not be aware of their ability to communicate performance concerns to LRTA. If LRTA does not ensure that MV Transportation follows procedures for processing complaints, LRTA may not be able to identify and remediate significant issues regarding deficient paratransit services. This could have a negative impact on the quality of services provided to LRTA's ADA-required paratransit riders.

### **Authoritative Guidance**

According to Section 27.13(b) of Title 49 of the Code of Federal Regulations, which was in effect during the audit period,

*A recipient shall adopt procedures that incorporate appropriate due process standards and provide for the prompt and equitable resolution of complaints.*

- (1) The process for filing a complaint, including the name, address, telephone number, and email address of the employee designated . . . must be sufficiently advertised to the public, such as on the entity's Web site; . . .*
- (3) The recipient must promptly communicate its response to the complaint allegations, including its reasons for the response, to the complainant by a means that will result in documentation of the response.*

According to LRTA's "Road Runner Standard Operating Procedure,"

- Complaint form will be filled out by the staff member receiving the complaint.*
- Submit the form immediately to General Manager or designee.*
- General Manager or designee will follow up with all complaints within 2 business days. . . .*
- Reservations/Dispatcher will speak to customer or person submitting comment/complaint.*
- The comment will be documented on the customer comment/complaint form.*
- Once documented the comment will be given to the General Manager and/or Operation's Manager.*

- *The General Manager or Operation's Manager will investigate each incident or comment in a timely manner, taking statements from personnel involved and contacting the customer to obtain any additional questions or information needed.*
- *The General or Operation's Manager will attempt to respond to every complaint within 48 hours after a full investigation.*

## Reasons for Issue

LRTA told us that it had previously advertised its complaint process and provided online complaint forms. However, LRTA removed complaint forms and advertisements for the process from its website following a high number of complaints that were unrelated to the ADA-required paratransit services it provided.

LRTA did not have monitoring controls (e.g., a complaint log or a LRTA employee's contact information on its website for riders to contact) to ensure that MV Transportation recorded and processed all ADA paratransit complaints it received on LRTA's behalf—and filled out complaint forms—in accordance with federal and LRTA requirements.

## Recommendations

1. LRTA should update its website to include the process for filing an ADA paratransit complaint.
2. LRTA should update its website to include the name, address, telephone number, and email address of the designated LRTA employee responsible for overseeing MV Transportation's administration of the ADA paratransit complaint process.
3. LRTA should ensure that MV Transportation fills out a complaint form for each ADA paratransit complaint received.
4. LRTA should implement a complaint log (manual or electronic) that includes the date each complaint was received and a complaint identification number to ensure that MV Transportation records all complaints it receives for LRTA.
5. LRTA should ensure that complainants receive acknowledgements of their complaints within two business days.

## Auditee's Response

*The LRTA's Contractor has an internal process for addressing all complaints in a timely manner. This process has been successful in the past to receive, research, address, and resolve any complaints, and all complaints are discussed at the monthly Contractor Oversight meetings with the LRTA Administrator. There are currently no outstanding ADA complaints. The LRTA has initiated additional steps in the process to increase administrative oversight:*

- *The LRTA Compliance Director has been working to improve accessibility for individuals of all abilities to easily file and understand the complaint process as complaints arise. As a*



*result, the LRTA has streamlined the complaint form to include all major areas including, but not limited to: ADA, [Equal Employment Opportunity], Title VI, and [Disadvantaged Business Enterprise]. This form can be accessed on the website and has multiple submission options such as filling the form electronically and emailing / mailing it back in. Alternatively, this can be printed and filled out before being sent in. In the case that someone needs assistance filling in the form, there is a contact form for the [personal care assistant] or assistant for the individual filing the complaint.*

- *The LRTA website has a link from the Contact Us page as it is a centralized area where individuals will likely look at when trying to file a complaint. This complaint form page has instructions, explanations of the process, and [provides] contact information for the Compliance Director for all patrons.*
- *In order to properly track, address, and maintain records, there is a singular point of contact in which all complaint forms are sent. All the forms are sent to the Compliance Director who reaches out to other members of the team to investigate and address complaints as necessary.*
- *The LRTA has improved the internal complaint record form to monitor the complaint, the contact information of the complainant, summary of the complaint, details collected on the complaint and investigative measures, what corrective actions have been taken if necessary, and a final response summary of the situation and actions taken. This form is signed by both the LRTA response leader and the LRTA Administrator so it is clear who has investigated and addressed the complaints at hand.*

### **Auditor's Reply**

Based on the response above, LRTA is taking measures to address our concerns.