



**AUDITOR GENERAL'S
REPORT
ACTION REQUIRED**

Review of Wheel-Trans Services – Sustaining Level and Quality of Service Requires Changes to the Program

Date:	December 6, 2012
To:	Toronto Transit Commission
From:	Jeff Griffiths, Auditor General
Wards:	All
Reference Number:	

SUMMARY

The Auditor General's 2012 Audit Work Plan included a review of Wheel-Trans operations. Provision of accessible transit services is governed by provincial legislation. Wheel-Trans provides specialized accessible transit services within the City of Toronto to persons with mobility difficulties. Using accessible buses, accessible taxis and sedan taxis, Wheel-Trans provided approximately 2.7 million door-to-door trips to over 41,000 registrants in 2011.

The objective of the audit was to assess the effectiveness and efficiency of Wheel-Trans operations and services, and to identify improvement opportunities. The audit results and recommendations are contained in the attached report entitled "Review of Wheel-Trans Services – Sustaining Level and Quality of Service Requires Changes to the Program."

RECOMMENDATIONS

The Auditor General recommends that:

1. The Commission request the Chief Executive Officer, in consultation with the Advisory Committee on Accessible Transit, to explore various short-term options, including a free-ride program on a pilot basis, to encourage Wheel-Trans customers to use the accessible conventional transit system.
2. The Commission request the Chief Executive Officer, in consultation with the Advisory Committee on Accessible Transit, to develop and implement a comprehensive plan for integrating Wheel-Trans customers into the accessible

- conventional transit system. Such an action plan should include but not be limited to:
- a. Identifying and addressing potential safety and service issues that can present barriers to Wheel-Trans customers in using the accessible conventional system;
 - b. Education, communication and training programs for Wheel-Trans customers and transit passengers; and
 - c. Customer service training to TTC staff with particular emphasis on assisting people with mobility difficulties.
3. The Commission request the Chief Executive Officer to expedite the planning and implementation of an eligibility classification system for Wheel-Trans services in accordance with requirements set forth in the Integrated Accessibility Standards Regulation made under the Accessibility for Ontarians with Disabilities Act.
4. The Commission request the Chief Executive Officer, in consultation with the Advisory Committee on Accessible Transit, to review and enhance the Wheel-Trans eligibility assessment process and criteria to ensure that applicants' abilities to use the conventional transit system are objectively and credibly appraised. Steps to be considered should include but not be limited to:
- a. Requiring a medical or health certification regarding mobility conditions as part of the application process;
 - b. Considering the merits and cost-effectiveness of incorporating functional evaluations into the eligibility assessment process; and
 - c. Evaluating the effectiveness of the assessment criteria, scoring scheme, and threshold points for eligibility.
- The review should also take into consideration the process used by other providers throughout Canada and the United States.
5. The Commission request the Chief Executive Officer, in consultation with the Advisory Committee on Accessible Transit, to consider initiating a photo identification card program to applicants eligible for Wheel-Trans services.
6. The Commission request the Chief Executive Officer, in consultation with the Advisory Committee on Accessible Transit, give consideration to the establishment of a policy to discourage repetitive late cancellations and "no-shows" for Wheel-Trans eligibility assessment or appeal appointments.
7. The Commission request the Chief Executive Officer to develop and implement procedures to maintain an up-to-date Wheel-Trans registrant database. Steps should also be taken to systematically identify and cancel inactive passes in a timely manner.

8. The Commission request the Chief Executive Officer to review Wheel-Trans call center operations and call response capacity. Such review should include but not be limited to:
 - a. Shortening reservation line operating hours to allocate more staff resources to the afternoon hours;
 - b. Enhancing internet booking capacity by removing the address change and time booking restrictions;
 - c. Dedicating more staff resources to the priority line to ensure timely call response;
 - d. Addressing the high absenteeism rate among call center staff; and
 - e. Consulting 311 Toronto on ways to improve Wheel-Trans call center response capacity and reduce staff absenteeism rate.
9. The Commission request the Chief Executive Officer, in consultation with the Advisory Committee on Accessible Transit, to review the Wheel-Trans policy regarding late cancellations and no-shows with a view to increasing its flexibility. Consideration be given to including formalized processes for customers to request re-consideration based on unusual circumstances.
10. The Commission request the Chief Executive Officer, in consultation with the Advisory Committee on Accessible Transit, to consider developing procedures to identify and contact Wheel-Trans customers who consistently miss their scheduled trips to ensure they have a clear understanding of the pick-up and wait time rules.
11. The Commission request the Chief Executive Officer, in consultation with the Advisory Committee on Accessible Transit, to consider adopting a more restrictive Wheel-Trans late cancellation and no-show policy after successfully implementing the four-hour cancellation allowance, and incorporating the provisions for re-consideration.
12. The Commission request the Chief Executive Officer to monitor the extent of overtime incurred by Wheel-Trans bus operators and where possible steps be taken to reduce the level of overtime.
13. The Commission request the Chief Executive Director to continue to monitor and where possible steps be taken to reduce Wheel-Trans bus preventable collision rate.
14. The Commission request the Chief Executive Officer to monitor and refine the Wheel-Trans route scheduling system to improve efficiency. Ongoing monitoring should include processes to encourage customers and bus operators to report inefficient route scheduling for further investigation.

15. The Commission request the Chief Executive Officer to re-assess the needs for the existing Wheel-Trans community bus routes, and cancel or develop alternate routes to ensure the services are cost efficient and effective.
16. The Commission request the Chief Executive Officer to ensure that all future Requests For Proposal for Wheel-Trans contracted taxi services are designed to seek competitive bidding on price components as well as non-financial factors.
17. The Commission request the Chief Executive Officer, in developing future Request For Proposal for Wheel-Trans contracted accessible taxi services, to ensure that the monthly management fee is adequately structured to obtain the best overall value for the Commission.
18. The Commission request the Chief Executive Officer to take the necessary steps to enhance the procurement process in future acquisitions of Wheel-Trans contracted taxi services. Such steps should include but not be limited to:
 - a. Ensuring all terms and conditions in the Requests For Proposal and contract documents are reviewed for clarity and consistency;
 - b. Ensuring all concerns identified in the previous procurement process and contracts are addressed; and
 - c. Retaining a Fairness Commissioner to oversee the entire procurement process, from finalization of the Requests For Proposal to the final award of the contracts.
19. The Commission request the Chief Executive Officer, in developing future Requests For Proposal for Wheel-Trans contracted taxi services, to replace the bonus entitlement with a financial penalty clause to deter inadequate contractor performance or non-compliance with contract terms and conditions.
20. The Commission request the Chief Executive Officer, in developing future Requests For Proposal for Wheel-Trans contracted taxi services, to incorporate requirements for contractors to inform drivers of their rights and responsibilities as prescribed in the contracts, and how drivers may report inappropriate contractor practices to Wheel-Trans.
21. The Commission request the Chief Executive Officer to develop and update Wheel-Trans standard operating procedures in a timely manner, including those relating to taxi contract administration and monitoring.
22. The Commission request the Chief Executive Officer to reduce the annual printing and mailing costs of Wheel-Trans quarterly newsletters and bulletins to customers. Consideration should also be given to allowing advertisements in the publications to generate revenue.
23. This report be forwarded to the City Audit Committee for information.

Financial Impact

The implementation of recommendations in this report will result in cost savings and improved operating efficiencies. The extent of the resources required or potential cost savings resulting from implementing the recommendations in this report cannot be quantified at this time.

ISSUE BACKGROUND

The costs of delivering Wheel-Trans services are significant. The average cost for each trip is approximately \$31 in 2012, of which only 5 per cent is from fare revenue and 95 per cent is subsidized by the City.

Approximately 75 per cent of Wheel-Trans registrants are 65 years or older. As the population ages, more seniors will require Wheel-Trans services and the increasing trend will inevitably continue. In order to meet increasing demands, the net operating costs of Wheel-Trans have grown from \$60 million in 2006 to nearly \$97 million in 2012, and by 2015 the costs are projected to rise to \$115 million.

Faced with increasing service demands and costs, staff indicated in the 2012 Operating Budget that “...*The current trend is unsustainable for Wheel-Trans. The program is faced with the need to change its method of service delivery and to seek efficiencies in the way it runs its operation.*”

COMMENTS

With increasing demand for service and rising operating costs, Wheel-Trans is faced with the challenge of sustaining quality services while at the same time meeting legislative requirements and the TTC’s commitment to accessible transit services. The status quo is not an option. While this report does not provide a complete solution, it provides suggestions for best practice solutions and new methods for operating the program.

Implementing the recommendations included in the report will improve customer services and reduce operating costs without negatively impacting the existing level and quality of services.

The audit report entitled “Review of Wheel-Trans Services – Sustaining Level and Quality of Service Requires Changes to the Program” is attached as Appendix 1. Management’s response to each of the recommendations contained in the report is attached as Appendix 2.

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SIGNATURE

Jeff Griffiths, Auditor General

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ATTACHMENTS

[Appendix 1](#): Auditor General's Report, Review of Wheel-Trans Services – Sustaining Level and Quality of Service Requires Changes to the Program

[Appendix 2](#): Management's Response to the Auditor General's Review of Wheel-Trans Services – Sustaining Level and Quality of Service Requires Changes to the Program

AUDITOR GENERAL'S REPORT

**Review of Wheel-Trans Services -
Sustaining Level and Quality of Service
Requires Changes to the Program**

November 9, 2012

Jeffrey Griffiths, C.A., C.F.E.
Auditor General



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EXECUTIVE SUMMARY

The Auditor General's 2012 Audit Work Plan included a review of the operations of Wheel-Trans, a Division operated by the Toronto Transit Commission (TTC).

Provision of accessible transit services is governed by provincial legislation, in particular the Integrated Accessibility Standards Regulation made under the Accessibility for Ontarians with Disabilities Act.

Wheel-Trans provides door-to-door services to people with mobility difficulties

Wheel-Trans provides specialized accessible transit services within the City of Toronto to persons with mobility difficulties. Using accessible buses, accessible taxis and sedan taxis, Wheel-Trans provided approximately 2.7 million door-to-door trips to over 41,000 registrants in 2011.

The costs of delivering Wheel-Trans services are significant

The costs of delivering Wheel-Trans services are significant. The average cost for each trip is approximately \$31 in 2012, of which only 5 per cent is from fare revenue and 95 per cent is subsidized by the City.

Wheel-Trans is faced with an increasing demand for service and high operating costs

Approximately 75 per cent of Wheel-Trans registrants are 65 years or older. As the population ages, more seniors will require Wheel-Trans services and the increasing trend will inevitably continue. In order to meet increasing demands, the net operating costs of Wheel-Trans have grown from \$60 million in 2006 to nearly \$97 million in 2012, and by 2015 the costs are projected to rise to \$115 million.

Service not sustainable unless significant changes are made

Faced with increasing service demands and costs, staff very clearly indicated in the 2012 Operating Budget that "...*The current trend is unsustainable for Wheel-Trans. The program is faced with the need to change its method of service delivery and to seek efficiencies in the way it runs its operation.*"

Objective of audit

The objective of the audit was to assess the effectiveness and efficiency of Wheel-Trans operations and services, and to identify improvement opportunities. The audit covered the period from January 2011 to September 2012.

Key findings

Our key findings and recommendations are highlighted as follows:

Encouraging Wheel-Trans Customers to Use the Accessible Conventional Transit System

Considerable efforts have been made to improve accessibility of the conventional system

Over the past decade the TTC has made significant strides to make public transit more accessible for all its customers, including seniors and persons with disabilities. The entire TTC bus fleet is now wheelchair accessible, and 31 subway and rapid transit stations are equipped with elevators and other accessible features.

With ongoing accessibility improvements to the transit system, mobility limitations do not exist to the same extent they did a decade or so ago. Certain individuals who currently use Wheel-Trans may now be in a position to use the conventional system. Nonetheless, integration of Wheel-Trans customers into the accessible conventional transit system has so far been slow.

A “free ride” program on a pilot basis should be given consideration

With the increasing demand for Wheel-Trans services, alternative and innovative ways of operating the program are needed to maintain the level and quality of service and comply with legislative requirements. In this context piloting a free ride program to provide an incentive to Wheel-Trans customers to use the conventional transit is an area that should be considered. A “free ride” program may encourage customers to use the accessible conventional system on a voluntary basis.

Annual net savings from 5% integration could potentially be over \$4 million

For every individual Wheel-Trans trip that is integrated to the accessible conventional system, the TTC will realize \$28 net savings after accounting for the loss of fare revenue. The annual net cost savings from diverting five per cent of Wheel-Trans trips to the accessible conventional system can potentially be over \$4 million.

A “free ride” incentive minimizes impact on seniors

A piloted “free ride” incentive also takes into account that many Wheel-Trans customers, in particular the seniors, have over time become accustomed to door-to-door service. Instead of compelling them to switch to the accessible conventional system, customers would have the option to use the conventional transit services on a voluntary basis and take advantage of the “free ride” offer.

Various short-term incentives should be explored

Provision of a free ride program to Wheel-Trans customers represents a major policy decision that should be preceded by careful evaluation, analysis, consultation, and planning. Various short-term incentives, including piloting a “free ride” program, should be explored by staff to encourage Wheel-Trans customers to use the accessible conventional system.

Neither a medical certification nor a functional evaluation is required for eligibility assessment

Eligibility Assessment for Wheel-Trans Applicants

An effective and fair eligibility assessment is key to ensuring Wheel-Trans resources are provided to persons who need door-to-door services. Unlike many other para-transit providers in North America, Wheel-Trans does not require applicants to provide a medical certification, or participate in any functional evaluation as part of the eligibility assessment. The Wheel-Trans assessment is based entirely on the applicants’ own assertions and descriptions of their mobility challenges during an in-person interview by staff. However, these staff are not trained medical or health professionals.

In our view, consideration should be given to amending the eligibility application and assessment process to ensure applicant abilities to use the conventional system are objectively and credibly appraised. The current assessment criteria and scoring matrix, originally developed in 1996, should be reviewed to ensure they are effective.

Telephone trip booking is the major customer concern

Trip Booking

Based on customer comments we received, difficulties in booking trips through the Wheel-Trans telephone reservation line is a major customer concern. Receiving over 3,000 calls each day, the Wheel-Trans call center has not been able to answer calls in a timely manner. A number of changes are recommended to improve call response capacity and customer services including the following:

- Shortening the reservation line operating hours (currently closes at 11 p.m.) to allocate more staff to the afternoon hours

- Enhancing internet booking capacity to reduce call volume to the reservation line
- Reallocating staff resources to the “priority” line to assist customers calling when scheduled vehicles do not arrive on time
- Addressing high absenteeism rate among call center staff who averaged 25 unplanned absence days per staff person in 2011.

Late Cancellation and No-show Policy

Late cancellations and no-shows lead to productivity and financial loss

Approximately nine per cent of scheduled trips are cancelled on the date of service or no-show. Late cancellations and no-shows resulted in productivity loss and additional \$0.5 million taxi service contract costs in 2011. Our analysis of policies used in the cities of Hamilton, Calgary, and Washington D.C. identified opportunities for increasing the flexibility and effectiveness of the Wheel-Trans late cancellation/no-show policy.

Wheel-Trans Bus Services

Bus is the most expensive mode of service delivery

Compared with the contracted taxi services, Wheel-Trans operated buses are significantly more expensive. The average cost per trip was approximately \$46 for bus compared to \$22 for an accessible taxi and \$27 for a sedan taxi. However, buses are essential for Wheel-Trans services because they are able to transport all types of mobility devices, including large wheelchairs and scooters.

\$1.9 million overtime payments to bus operators in 2011

Steps should be taken to monitor and reduce overtime incurred by Wheel-Trans bus operators, which totalled approximately \$1.9 million in 2011. In addition, with an average ridership at five passengers per hour per bus, the effectiveness and cost efficiency of the five Wheel-Trans operated fixed-route community buses should be re-assessed.

Contracted Taxi Services

Over 60 per cent of Wheel-Trans trips were delivered by contracted taxis at a cost of approximately \$33 million in 2011. Both the accessible and sedan contracts are expiring at the end of 2013.

Previous procurement processes did not ask proponents to bid on prices

The previous taxi service procurement processes did not include competitive bidding on price components for both contracts. All price components including the taxi driver rates and the monthly management fee for contractors were pre-determined by staff and prescribed in the Request for Proposal documents. The selection of the preferred proponents was based on non-financial factors such as company experience in providing services to persons with disabilities and experience in operating a dispatch centre. The accessible contract was awarded to three separate companies and the sedan contract was awarded to two companies one of which was also the successful proponent for the accessible contract.

In awarding the accessible and sedan contracts in 2008, the Commission was advised of the exclusion of pricing in the proposal evaluation process.

Each accessible taxi contractor received a monthly management fee of \$89,000 in 2011

As stipulated by the contracts, each accessible taxi contractor received a fixed monthly management fee of \$89,000 in 2011 for managing approximately 50 vehicles. For the three contracts the annual management fees in total were \$3.3 million in 2011.

In our review of the accessible taxi monthly management fee, we noted that staff's initial cost estimate of the fee was, in our view, not appropriately calculated. This, coupled with the lack of a competitive process on pricing, in our view, eventually resulted in an excessive amount of accessible taxi management fees over the five-year contract term.

Competitive bidding and restructuring management fee could potentially result in significant savings

By incorporating competitive bidding on prices and replacing the fixed monthly management fee with a volume-based fee structure, the resultant cost savings in the upcoming procurement of contracted taxi services could be significant.

Fairness Commissioner should be used for procurement of future taxi services

In view of the magnitude and complexity of the accessible and sedan contracts, in our view an independent Fairness Commissioner should have been retained for the procurement process. We suggest that Wheel-Trans give consideration to ensuring a Fairness Commissioner is retained for all future procurement of accessible and sedan taxi services.

***Bonus provisions
be discontinued***

In addition, for all future accessible and sedan taxi contracts we suggest that bonus provisions be discontinued. Under the current contracts, annual bonuses totaling approximately \$250,000 were provided when contractors met the provisions of the contracts. Rather than bonus payments, penalty clauses be imposed for sub-par performance.

Conclusion

With increasing demand for service and rising operating costs, Wheel-Trans is faced with the challenge of sustaining the level and quality of services while at the same time meeting legislative requirements and the TTC's commitment to accessible transit services. The status quo is not an option. While this report does not provide a complete solution, it provides suggestions for "out of the box" solutions and new ways of operating the program. Implementation of the recommendations contained in the report has the potential to improve customer service and reduce operating costs without impacting the existing level and quality of services.

BACKGROUND

An Overview of Wheel-Trans Services

***Wheel-Trans
provides door-to-
door services to
people with
mobility
difficulties***

Wheel-Trans, a division operated by the Toronto Transit Commission (TTC), provides specialized accessible transit services within the City of Toronto to persons with mobility difficulties. Using accessible buses, accessible taxis and sedan taxis, Wheel-Trans provided approximately 2.7 million door-to-door trips to over 41,000 registrants in 2011.



Wheel-Trans operated accessible buses are capable of carrying all types of mobility devices including large wheelchairs and scooters



Accessible taxis (mini-van) are capable of transporting small wheelchairs and scooters .



Sedan taxis transport customers using canes, walkers and small folding wheelchairs

Services are provided year round

Wheel-Trans operates every day of the year from 6 a.m. to 1 a.m. during weekdays and 7 a.m. to 12:30 a.m. during weekends and holidays. Customers are required to attend an eligibility interview when applying for Wheel-Trans services. Once approved, customers receive a registration card and number, and are able to book trips by phone or via the internet.

Wheel-Trans trips can be for any purpose

The fare for a Wheel-Trans ride is the same as a regular TTC fare. Wheel-Trans registrants may use the services for any purpose, including medical appointments, shopping, and visiting relatives and friends.

Legislative Requirements and Governance

Provision of accessible transit services is required by law

Provision of accessible transit services is governed by provincial legislation including the Ontario Human Rights Code, the Highway Traffic Act, and the Accessibility for Ontarians with Disabilities Act (AODA). In particular, the Integrated Accessibility Standards Regulation made under AODA prescribes specific requirements for transportation services for persons with disabilities.

Various mechanisms to seek public input

The TTC has established an Accessible Customer Service Policy, publishes an annual report on its Accessible Transit Services Plan, and holds an annual public forum to seek customer comments on conventional and accessible transit services.

The TTC has also established an Advisory Committee on Accessible Transit to provide a process for ongoing public input into accessible transit services. In addition, the City has recently re-established the Disability Issues Committee as required by the AODA.

Annual Operating Costs and Challenges

2012 net operating costs at approximately \$97 million

The 2012 Wheel-Trans program net operating costs were budgeted at approximately \$97 million, 41 per cent of which was for bus operations, 36 per cent for contracted accessible and sedan taxi services, and 23 per cent for administrative and other costs. The 2012 approved staff positions for Wheel-Trans were 529.

Wheel-Trans is faced with an increasing demand for service and high operating costs

Wheel-Trans continues to face an increasing service demand. Customer trips are expected to increase from 2.7 million in 2011 to 3.1 million in 2012. The number of registrants is expected to grow from approximately 41,000 in 2011 to 43,000 in 2012. The costs of delivering Wheel-Trans services are significant. The average cost for each trip is approximately \$31 in 2012, of which only 5 per cent is recovered from fare revenue. The City subsidizes the remaining 95 per cent.

Given the increasing demand for service and the high operating costs, Wheel-Trans is faced with the challenge to sustain services while meeting legislative requirements and the TTC's commitment to accessible transit services.

AUDIT OBJECTIVES, SCOPE AND METHODOLOGY

***Audit was
included in the
Auditor
General's 2012
Work Plan***

The Auditor General's 2012 Work Plan included a review of Wheel-Trans operations. The objective of the audit was to assess the effectiveness and efficiency of Wheel-Trans operations and services. The audit covered the period from January 2011 to September 2012.

Specifically the audit included a review of the following areas:

- Legislative requirements governing the provision of specialized transportation services
- Program costs
- Opportunities to integrate customers to accessible conventional transit services
- Eligibility criteria, and application approval and appeal processes
- Trip booking and scheduling
- Late cancellation rate and policy
- Bus operations
- Contracted taxi services.

The provision of Wheel-Trans services to dialysis patients was originally included in the Auditor General's review. However, in September 2012 the Commission decided to, effective January 2013, discontinue services to dialysis patients who did not meet Wheel-Trans eligibility criteria. Our audit therefore did not include a review of services to dialysis patients as originally planned.

A wide range of work was conducted for the audit

Our audit work included the following:

- Reviews of relevant legislative and policy requirements
- Reviews of literature and studies regarding para-transit services
- Reviews of Wheel-Trans financial and operational data
- Interviews with Wheel-Trans staff
- Consultations with staff of the Office of Equity, Diversity and Human Rights, and staff of the Municipal Licensing and Standards Division
- On-site observations of customer eligibility assessment and appeal processes
- Observations of wheelchair and scooter riders navigating through the accessible conventional system
- Ride-along on Wheel-Trans buses
- Test uses of the trip booking system
- Analyses of service statistics, registrant database, and call center statistics
- Site visits to contracted taxi companies
- Reviews of taxi contract terms and conditions
- Review of taxi billing records
- Review of the confidential TTC Internal Audit report and the confidential External Legal Review Report pertaining to the accessible taxi service contracts.

Stakeholder Consultations

The audit included consultations with community groups, TTC and City Committees, and Wheel-Trans customers.

Community groups servicing people with disabilities and seniors provided input to the audit

The following community groups servicing people with disabilities and seniors were consulted:

- Centre for Independent Living Toronto
- Ethno-Racial People with Disabilities Coalition of Ontario
- Toronto Seniors' Forum

TTC and City Committees were consulted

We also advised the TTC's Advisory Committee on Accessible Transit and the City's Disability Issues Committee of our audit and provided them the opportunity to submit comments and suggestions. Written comments and suggestions were received from the Disability Issues Committee.

***Auditor General
heard directly
from Wheel-
Trans customers***

In addition, we requested Wheel-Trans to advise its customers of our audit through the internet and the telephone trip booking systems. Customers were advised that they could email or mail their specific comments or suggestions to our Office within a two-week period in September 2012. Nearly 300 customers provided comments and suggestions all of which were reviewed, analyzed, and where appropriate incorporated into our audit findings and recommendations.

***No Wheel-Trans
employee
comments were
received***

We also asked Wheel-Trans to inform their employees of our audit. Employees were sent an internal communication from Wheel-Trans senior management notifying them of the opportunity to submit comments and suggestions to the Auditor General's Office within a two-week period in September 2012. No comments or suggestions were received from Wheel-Trans employees.

Last but not least, we met with former City Councillor Anne Johnston. Ms. Johnston has over the years acted as an advocate for seniors and persons with disabilities. With her many years of involvement in Wheel-Trans related activities, Ms. Johnston provided insightful and valuable comments and suggestions.

Benchmarking – Review of Operations at Other Cities throughout Canada and the United States

We also contacted a number of cities in Ontario and other provinces in Canada, as well as a number of cities in the United States in order to compare their operations with Wheel-Trans. The following six para-transit service providers were included in our review:

***Information
from six
para-transit
services was
reviewed***

- Hamilton - Disabled and Aged Regional Transportation System
- Ottawa - Para Transpo
- Montreal - STM Paratransit
- Calgary - Access Calgary
- Washington Metropolitan Area - MetroAccess Paratransit
- San Francisco - Accessible Service

Specific operational information was obtained through requests to each of the above para-transit providers.

In addition, we reviewed website information pertaining to para-transit service providers for Los Angeles County and San Antonio, Texas.

Compliance with generally accepted government auditing standards

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.

AUDIT RESULTS

Wheel-Trans is a complex operation

Wheel-Trans is an extremely complex operation. It involves providing on a daily basis over 10,000 door-to-door trips customized based on individual requested times, locations, and assistive devices. Wheel-Trans is also responsible for the management and oversight of both the accessible and sedan taxi contracts.

A. THE NEED TO INTEGRATE CERTAIN WHEEL-TRANS CUSTOMERS INTO THE CONVENTIONAL TRANSIT SYSTEM

A.1. The Current Way of Doing Business is Not Sustainable

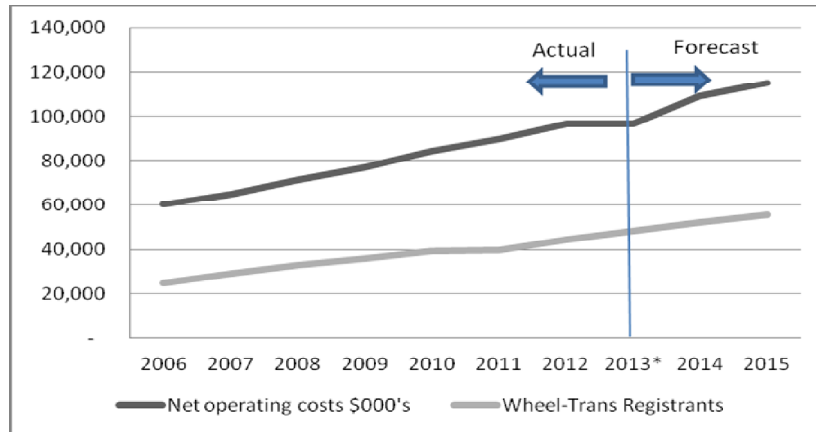
Number of registrants grew by 10% per year since 2006

While Toronto's population grew by approximately one per cent annually since 2006, Wheel-Trans registrants rose nearly 10 per cent per year from approximately 25,000 in 2006 to nearly 43,000 by 2012. Approximately 75 per cent of Wheel-Trans registrants are 65 years or older. As the population ages, more seniors will require Wheel-Trans services and the increasing trend will inevitably continue.

Operating costs projected at \$115 million by 2015

Wheel-Trans net operating costs have risen from \$60 million in 2006 to nearly \$97 million in 2012. According to data compiled by staff, the projected net operating costs, as shown in Figure 1, will likely rise to \$115 million by 2015 to provide services to over 55,000 customers.

Figure 1: Wheel-Trans Net Operating Costs and Number of Registrants, 2006 to 2015



*The leveling off of projected net operating costs in 2013 is due to the discontinuation of services to dialysis patients

Legislative requirements will exert further financial pressure on Wheel-Trans

The new legislative requirements from the AODA’s Integrated Accessibility Standards Regulation will exert further financial pressure on Wheel-Trans. For instance, according to the Regulation, effective January 2014, conventional transit and para-transit providers will not be permitted to charge a fare to a support person who is accompanying a person with a disability and has a need for a support person. The revenue loss for Wheel-Trans is estimated to be \$0.5 million per year.

Service level may not be sustainable given increasing demands

Faced with rising service demands and costs, Wheel-Trans very clearly pointed out in its 2012 Operating Budget submission that “...*The current trend is unsustainable for Wheel-Trans. The program is faced with the need to change its method of service delivery and to seek efficiencies in the way it runs its operation.*”

Certain trips can be accomplished by the conventional accessible system

Over the years, TTC has expanded and continues to expand accessibility of the conventional transit system. All TTC buses are now wheelchair accessible, and 31 of the 69 subway and rapid transit stations are equipped with elevators and accessible fare gates. Further, a new fleet of accessible streetcars will begin service in 2014 with a complete replacement of streetcars planned by 2019.

To encourage customers to take advantage of the accessible conventional system, Wheel-Trans has introduced a number of initiatives including the “Same Day Service Link” whereby customers can book on the day of service a Wheel-Trans trip to and from the closest accessible subway station.

Certain Wheel-Trans customers may find it more practical to use the accessible conventional system

Continually improving the accessibility of conventional transit service will allow a larger percentage of current and future Wheel-Trans registrants to make more use of the conventional system and to benefit from spontaneous trip-making and more-flexible travel options. The integration of the TTC’s conventional and door-to-door services will make it more practical for certain Wheel-Trans registrants to travel on the conventional system.

While improving the accessibility of conventional services will never eliminate the need for door- to-door services, the improvements to the conventional transit system will allow a certain percentage of people with mobility difficulties to use the accessible conventional transit system.

A.2. Providing Wheel-Trans Customers Free Rides on the Conventional System May End Up Saving TTC Money

Anticipated less than 1% of trips will be diverted to conventional system

Even with the accessibility improvements, few Wheel-Trans customers are transferring to the conventional transit system. Staff estimate that approximately 20,000 Wheel-Trans trips in 2012, or less than one per cent of total yearly trips, will be diverted to the fixed-route system. In a telephone survey conducted by Wheel-Trans in 2012, of 188 customers for whom the conventional transit system might be a viable alternative, only 1 in 4 respondents would consider transferring to the conventional system.

A tangible incentive may be needed

In order to encourage certain Wheel-Trans customers to use the conventional system, an innovative and more tangible incentive, such as a free ride program, should be considered.

Other cities have adopted a free fare program as an incentive

Other cities have incorporated different forms of free-ride programs to encourage para-transit customers to use the conventional system where possible. For instance, Washington Metro Area Transit Authority offers eligible para-transit riders free rides when using conventional transit. Metro staff indicated that the free ride program, along with training to assist para-transit riders in using the conventional system, have contributed to an 11 per cent decrease in para-transit ridership demands between 2011 and 2012. In addition, in Los Angeles County and San Antonio, Texas, eligible para-transit riders can use the conventional transit system free of charge.

The increased use of accessible conventional services by Wheel-Trans users will have a significant financial benefit to the TTC.

Net saving of \$28 per Wheel-Trans trip diverted to regular TTC system

From a financial perspective, each Wheel-Trans trip that is diverted to the accessible conventional system will result in approximately \$28 net savings for the TTC after accounting for the loss of fare revenue.

Figure 2 shows the estimated projected savings based on 2012 cash fare rates.

Figure 2: Projected Savings from Diversion of Wheel-Trans Trips to Accessible Conventional Transit System

Percentage of trips diverted	Number of Wheel-Trans trips diverted (1)	Costs of Wheel-Trans door-to-door services (\$million) (2)	Regular fare revenue loss (\$million) (3)	Annual net savings (\$million)
5%	155,000	\$4.8	(\$0.4)	\$4.4
10%	310,000	\$9.6	(\$0.7)	\$8.9
15%	465,000	\$14.4	(\$1.1)	\$13.3

(1) Based on projected total 3.1 million trips in 2012

(2) Based on average \$31 per trip in 2012

(3) Based on average 75% customers pay senior cash fare at \$2 and 25% at \$3 regular cash fare, 2012 fare rates

A “free ride” incentive minimizes impact on seniors

From a customer perspective, a “free ride” incentive takes into account that many Wheel-Trans customers, in particular seniors, have over time become accustomed to the door-to-door services. Instead of compelling them to switch to the accessible conventional system, customers would have the option to use the conventional transit system on a voluntary basis and take advantage of the “free ride” offer.

Careful evaluation and planning are needed

We appreciate that provision of a free ride program to Wheel-Trans customers represents a major policy decision that should be preceded by careful evaluation, consultation and planning. It is therefore recommended that staff explore various short-term options, including a free ride program on a pilot basis, to provide Wheel-Trans customers an incentive to use the accessible conventional system. Continuation of the piloted incentive should be contingent upon the benefits achieved.

Mandatory photo ID for Wheel-Trans customers taking advantage of the free ride offer

If the Commission endorses piloting a free ride program, one of the steps in planning will be the provision of photo identification cards to Wheel-Trans customers who wish to take advantage of the program. A photo identification card is a control to assure that only eligible Wheel-Trans customers are entitled to ride free on the conventional system. Currently Wheel-Trans does not provide a photo identification card to customers.

Recommendation:

- 1. The Commission request the Chief Executive Officer, in consultation with the Advisory Committee on Accessible Transit, to explore various short-term options, including a free-ride program on a pilot basis, to encourage Wheel-Trans customers to use the accessible conventional transit system.**

A.3. Improving Accessibility on the Conventional Transit System

In order to encourage, where possible, the use of the conventional transit system by current Wheel-Trans customers, there is a need to ensure that the system is readily available to accommodate these individuals.

Always a need for door-to-door services

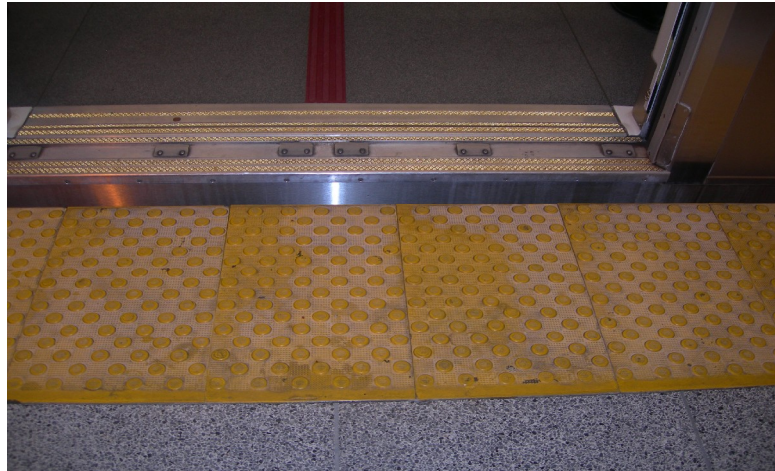
While there will always be a need for door-to-door transportation services, improving accessibility of the conventional system will enable more current and future Wheel-Trans registrants to make use of the fixed-route services and travel with more flexibility and options.

As part of the audit, we consulted with both seniors and people with disabilities to comprehend and appreciate the challenges faced by each of these groups in using the conventional transit system.

As a result of these discussions, it was apparent that even with the current level of accessibility at the TTC, individuals with disabilities continue to experience difficulties using the transit system. The following issues were constant themes identified during the course of our work:

- Malfunctioning elevators
- Difficulties accessing subway trains because platforms are not properly aligned with subway trains
- Uncooperative bus drivers and other TTC staff.

Photograph showing the gap between the train door and the platform



TTC has made a concerted effort to improve accessibility

We recognize that retrofitting a transit system not originally designed for accessibility is inevitably constrained by technical and cost issues. Over the years, TTC has made and continues to make concerted efforts to improve accessibility of the conventional system. A number of preventive and contingency measures have been recently put in place including improving elevator maintenance, and extending TTC Customer Service hours.

Addressing safety risks should be a priority

To ensure a reliable and safe transit system for people with mobility difficulties, it is important that TTC continues to identify and address potential safety issues, as well as develop and implement contingency procedures to assist riders during elevator malfunctioning or other emergency situations.

***An action plan
for integration is
needed***

Equally important is the development of a plan to prepare for and facilitate the integration of Wheel-Trans customers into the accessible conventional system. Programs to familiarize Wheel-Trans customers with the accessible conventional system, and to educate passengers on the importance of accommodating people with disabilities should be part and parcel of the plan.

Moreover, TTC staff responsible for customer service should be provided with adequate training on assisting people with mobility difficulties.

Recommendation:

- 2. The Commission request the Chief Executive Officer, in consultation with the Advisory Committee on Accessible Transit, to develop and implement a comprehensive plan for integrating Wheel-Trans customers into the accessible conventional transit system. Such an action plan should include but not be limited to:**
 - a. Identifying and addressing potential safety and service issues that can present barriers to Wheel-Trans customers in using the accessible conventional system;**
 - b. Education, communication and training programs for Wheel-Trans customers and transit passengers; and**
 - c. Customer service training to TTC staff with particular emphasis on assisting people with mobility difficulties.**

B. ELIGIBILITY ASSESSMENT FOR WHEEL-TRANS APPLICANTS

B.1. Meeting Legislative Requirements for Eligibility Classification

Classification of eligibility is prescribed by the new legislative requirements

Under AODA's Integrated Accessibility Standards Regulation, by January 1, 2017, all service providers in Ontario are required to classify eligibility for specialized transportation services into three categories:

- (a) Unconditional eligibility
- (b) Temporary eligibility
- (c) Conditional eligibility

The Regulation defines each category of eligibility as follows:

“1. A person with a disability that prevents them from using conventional transportation services shall be categorized as having unconditional eligibility.

2. A person with a temporary disability that prevents them from using conventional transportation services shall be categorized as having temporary eligibility.

3. A person with a disability where environmental or physical barriers limit their ability to consistently use conventional transportation services shall be categorized as having conditional eligibility. O. Reg. 191/11, s. 63 (2).”

The majority of Wheel-Trans riders are given a “permanent pass”

Wheel-Trans currently issues four types of passes to eligible riders. The percentage of each type of pass issued as of July 2012 was:

- “Permanent pass” – 92% customers
- “Dialysis patient” – 5% customers
- “Temporary pass” – 3% customers
- “Seasonal pass” – 14 customers only

Wheel-Trans will need to re-design how it classifies eligibility for services

Wheel-Trans' current classification system does not distinguish between "unconditional" and "conditional" eligibility, and will need to be revised to be in compliance with the Regulation.

Compliance with the required eligibility classification will also help identify riders for whom the accessible conventional system may be a viable alternative. This is a key step in any initiative to integrate certain Wheel-Trans customers into the accessible conventional system.

Expediting a new eligibility classification system

While service providers have until January 2017 for meeting the classification requirements, Wheel-Trans should expedite the planning and implementation of a new eligibility classification system in order to facilitate the integration of customers into the accessible conventional transit system.

Recommendation:

- 3. The Commission request the Chief Executive Officer to expedite the planning and implementation of an eligibility classification system for Wheel-Trans services in accordance with requirements set forth in the Integrated Accessibility Standards Regulation made under the Accessibility for Ontarians with Disabilities Act.**

B.2. Enhancing the Eligibility Assessment Process

Over 9,000 new registrants were eligible for services in 2011

The current Wheel-Trans eligibility assessment process consists of an in-person interview and an opportunity to appeal if the application is denied. On average approximately 90 per cent of applications are approved after the in-person interview. Over 9,000 new registrants were approved for Wheel-Trans services in 2011.

Audit included on-site observations and benchmarking

There are currently six eligibility assessment locations throughout the City. We observed the assessment process at various locations, and compared the Wheel-Trans assessment criteria and process with those used by other para-transit providers.

No requirement for medical certification or functional evaluation

To apply for Wheel-Trans services in the City of Toronto, applicants are required to attend an in-person eligibility interview. Applicants are not required to complete an application form prior to the interview. An application form is completed by third-party contracted staff during the interview process.

Applicants for Wheel-Trans services are not required to provide a medical or health certification attesting to their mobility limitations nor are applicants required to participate in any physical functional evaluation during the interview.

Applicants are asked questions about their ability to navigate in homes and in the community

During the in-person interviews, applicants are asked questions relating to their physical ability to navigate in their homes and in the community. Based on their answers, the interviewers select a specific rating from a scale ranging from 0 to 30 for each assessment question. Applicants whose total scores meet or exceed the threshold of 60 points (out of total 140 points) are deemed to be eligible for Wheel-Trans service.

The assessment criteria and scoring scheme were originally developed in 1996 by a working group established by the Advisory Committee on Accessible Transit. In response to feedback from Wheel-Trans customers and community groups, the Commission in 1997 approved lowering the threshold for eligibility from 80 points to 60 points to “*encompass all individuals who have a physical functional need for accessible transportation*”.

An applicant attending the interview with an assistive device is likely to qualify

Based on our on-site observations and reviews of assessment results, under the current system, an applicant attending an eligibility interview with an assistive device such as a cane or a walker would likely meet the eligibility threshold as long as the applicant indicates a certain level of mobility difficulty at home and in the community.

Figure 3 lists the application and assessment requirements by para-transit providers in Toronto and other cities.

Figure 3: Eligibility Application and Assessment Requirements of Selected Para-Transit Providers

	Toronto	Hamilton	Ottawa	Montreal	Calgary	Washington	San Francisco
Pre-screening of application form	X	v	v	v	v	v	v
In-person interview	v	v ¹	X	X	v ²	v	v ³
Medical/health certification	X	v	v	v	v	v	v ³
Functional evaluation	X	v ¹	X	X	X	v	v ³

1. Hamilton Accessible Transportation Services - Introduced a third-party functional assessment option including an in-person interview in November 2012
2. Access Calgary – An in-person interview is not required if certain eligibility criteria are met
3. San Francisco Accessible Service – Applicants are required to sign an authorization to release medical information and provide the name of the licensed professional on the application form; 90% of applicants are required to undergo a telephone or personal interview, a call by staff to the health profession to verify health conditions, or a functional evaluation for limited instances.

A third-party verification of an applicant’s medical/health information is commonly required

While these service providers have adopted varying assessment processes, they all require some form of third-party medical/health verification either as a certification by a licensed professional or an authorization for the service provider to verify an applicant’s medical/health information. As indicated above, the City’s Wheel-Trans assessment process does not require an applicant to provide any verification of medical or health information.

Eligibility based on applicants’ own assertions

Although Wheel-Trans contracted staff are trained to conduct eligibility interviews, they are not health professionals and their ability to evaluate a person’s eligibility for Wheel- Trans services is somewhat limited. Without any third-party medical verification or functional evaluation, the determination of eligibility is based entirely on the applicants’ own assertions.

A medical certification is required when applying for accessible parking permits in Ontario

As an aside and for comparative purposes only, the provision of a medical certification is required by the Ministry of Transportation in approving accessible parking permits in Ontario. Applicants for an accessible parking permit are required to ask their licensed health practitioners to certify their health conditions on the permit application form.

In addition to a medical/health certification, certain para-transit providers in the United States also require applicants to participate in functional evaluations relating to endurance and travel distance, and an ability to navigate curbs or flights of stairs. These evaluations are usually conducted by a certified health practitioner such as an occupational therapist. We recognize that the inclusion of functional evaluations by certified health practitioners will increase the costs of eligibility assessments.

By employing a more thorough application and assessment process consisting of a requirement to submit an application form with a medical verification, an in-person interview, and a functional evaluation, staff of Washington MetroAccess Paratransit indicated that approximately 70 per cent of applications processed in 2011 were approved for para-transit services. The application approval rate by Wheel-Trans is approximately 90 per cent.

An effective eligibility assessment ensures that quality service is provided to persons who have a right to the service

An effective eligibility assessment is key to ensuring Wheel-Trans resources are provided to persons who need door-to-door services. We recognize the importance of not making the evaluation process too restrictive and onerous. However, the ease of the process should be balanced with the need for verifying an applicant's level of mobility.

All of the para-transit providers we consulted have incorporated the requirement for a health certification or verification as part of the application process. It will be beneficial for Wheel-Trans staff to review the application requirements and approval processes used by these service providers.

In our view, additional steps should be considered to ensure an applicant's ability to use the conventional transit system is objectively and credibly evaluated. The inclusion of a health verification as part of the application process will enhance the objectivity of the current assessment process. Final determination on an applicant's eligibility for Wheel-Trans services should continue to be made by staff involved in the assessment process.

Recommendation:

- 4. The Commission request the Chief Executive Officer, in consultation with the Advisory Committee on Accessible Transit, to review and enhance the Wheel-Trans eligibility assessment process and criteria to ensure that applicants’ abilities to use the conventional transit system are objectively and credibly appraised. Steps to be considered should include but not be limited to:**
 - a. Requiring a medical or health certification regarding mobility conditions as part of the application process;**
 - b. Considering the merits and cost-effectiveness of incorporating functional evaluations into the eligibility assessment process; and**
 - c. Evaluating the effectiveness of the assessment criteria, scoring scheme, and threshold points for eligibility.**

The review should also take into consideration the process used by other providers throughout Canada and the United States.

B.3. Providing Photo Identification Cards to Eligible Wheel-Trans Customers

Wheel-Trans does not provide eligible riders a photo ID card

When an application for Wheel-Trans service is approved, the applicant is provided an eligibility card with a pass number. Paratransit providers in San Francisco, Los Angeles County, Washington, Montreal, and Hamilton (for subsidized taxi services) provide a photo identification card to eligible riders.

A photo identification card is an important control against non-eligible usage, without which it would be difficult to verify the eligibility of persons boarding Wheel-Trans vehicles.

Wheel-Trans has a process to detect questionable riders

To identify non-eligible usage, Wheel-Trans has established a “questionable rider program” through which 60 to 80 riders each year were identified and questioned regarding their eligibility status. Approximately half of the riders questioned had their passes revoked.

A photo ID is an important preventive and detective control

While the “questionable rider program” provides certain safeguards against non-eligible usage, consideration be given to introducing photo identification to enhance controls over non-eligible usage.

Additionally, should the Commission decide to pilot a free ride program to encourage Wheel-Trans customers to use the conventional system, a photo identification card should be issued to Wheel-Trans eligible riders who want to take advantage of the free fare offer.

Recommendation:

- 5. The Commission request the Chief Executive Officer, in consultation with the Advisory Committee on Accessible Transit, to consider initiating a photo identification card program to applicants eligible for Wheel-Trans services.**

B.4. Minimizing Eligibility Interview Appointment Late Cancellations and “No-Shows”

Interviews are scheduled by appointment and free of charge

To attend an eligibility interview, applicants are required to contact Wheel-Trans Customer Services to reserve an interview appointment. As well, free transportation by Wheel-Trans to the interview location and a return trip home are available upon request. The eligibility and appeal interviews are provided free of charge in accordance with regulatory requirements.

Contractors are reimbursed a fee even when the applicants do not attend the scheduled appointments

Both eligibility and appeal interviews are conducted by external third party contract staff. For each interview completed, the contractors are paid a fee as stipulated in the contracts. When an appointment is cancelled less than 24 hours prior to the appointment (i.e. late cancellation) or the applicant fails to attend the interview (i.e. no-show), the contractors are paid a portion of the interview fee.

\$43,000 late cancellation and “no-show” fees for scheduled interviews

To minimize the late cancellation and no-show costs, Wheel-Trans staff contact applicants a day before the appointments to confirm their attendance. Despite this, more than 10 per cent of the scheduled eligibility and appeal interviews in 2011 were cancelled on the date of the appointment or “no-show”, resulting in approximately \$43,000 in additional fees paid to the contractor.

Policy for appointment cancellations and ‘no-shows’ be considered

While there are inevitable circumstances where applicants are unable to attend the interview appointments as scheduled, a policy to address repetitive late cancellations or “no-show” should be considered. For instance, Washington MetroAccess Paratransit has established a policy requiring applicants to submit a new application and wait for 120 days to re-apply if cancelling or missing more than two appointments without advance notice.

Recommendation:

- 6. The Commission request the Chief Executive Officer, in consultation with the Advisory Committee on Accessible Transit, give consideration to the establishment of a policy to discourage repetitive late cancellations and “no-shows” for Wheel-Trans eligibility assessment or appeal appointments.**

B.5. Maintaining an Up-to-Date Registrant Database

Over 60,000 customers have a permanent pass

Wheel-Trans does not have a renewal requirement for eligible customers. Since inception more than 60,000 customers have been granted a permanent pass that can be used indefinitely. However, many of these passes have not been used for a considerable period of time.

A two-year timeframe is used to define “active” registrants

To estimate the number of customers currently in need of the service, Wheel-Trans defines “active” registrants as those who booked at least one trip during the past two years. Under this definition, there were over 43,000 “active” registrants as of June 2012.

No procedure to contact customers to update their status

In the absence of a renewal requirement, Wheel-Trans should at least have a process to systematically update customer status. Currently Wheel-Trans relies on family members to notify staff when a customer is deceased. While it does receive a number of notifications every year, this is not a reliable way to maintain an up-to-date registrant database.

Inactive passes increase the risk for non-eligible use of services

Delays in cancelling passes increase the risk of passes being used by non-eligible persons, particularly when the current registration process does not provide a photo identification card to eligible customers. To ensure services are provided only to eligible customers, Wheel-Trans should establish procedures to identify inactive customers, verify customer status and their need for services, as well as cancel inactive passes in a timely manner.

Recommendation:

7. The Commission request the Chief Executive Officer to develop and implement procedures to maintain an up-to-date Wheel-Trans registrant database. Steps should also be taken to systematically identify and cancel inactive passes in a timely manner.

C. TRIP BOOKING

C.1. Improving Call Center Operations

The Wheel-Trans call center receives over 3,000 calls per day and provides various services through three telephone lines. Figure 4 outlines the main functions, operating hours, and staffing for each telephone line.

Figure 4: Wheel-Trans Call Center Functions, Service Hours, and Staffing

	Main functions	Operating Hours	Staffing
Reservation line	- Trip booking - Changes to customer data	Available everyday 7:00 a.m. to 11:00 p.m.	24 staff on 3 shifts
Dispatch/Priority line	- Vehicle no-shows or late arrivals - Vehicle and customer emergency on road	Weekdays: 5:30 a.m. to 1:30 a.m. Weekends/holidays: 6:30 a.m. to 1:00 a.m.	16 staff on 5 shifts 1 dedicated staff person for the priority line
Customer service line	- Customer complaints - Eligibility interview appointment booking	Weekdays: 8 a.m. to 4:00 p.m.	7 staff

Reservation Line

65% of trips are booked through the telephone reservation line

Wheel-Trans customers can book trips by calling the reservation line, or through the internet or the touch-tone telephone system. While internet booking is becoming more popular, the majority of trips (65%) are booked through the reservation line. In addition, customers are required to call the reservation line when requesting changes to personal information such as addresses.

Dispatch/Priority Line

Customers may call the priority line when their vehicles are late or “no-show”

The dispatch/priority line is set up as a contact point for customers when scheduled vehicles are late. The priority line is part of the dispatch functions which include the handling of day-to-day scheduling changes caused by vehicle breakdown, staff changes, or other emergencies. At the time of our audit, one staff person per shift was designated to answer calls to the priority line.

Customer Service Line

A dedicated line for customer complaints

A separate customer service telephone line has been established to receive customer complaints and to schedule eligibility interview appointments.

Major Customer Concerns

Major customer concerns are difficulties in booking trips through the reservation line

According to the TTC’s 2010 and 2011 annual public forum on accessible services, the number one customer concern was difficulties in booking trips through the telephone reservation line. This was echoed by customers providing comments to our audit. Examples of customer comments were as follows:

“One is placed on hold for 10, 20 to even 40 minutes sometimes when one calls to book a ride or to make an inquiry.”

“My biggest complaint is about the telephone service. I have put my phone on speaker and have let it ring up to 45 minutes before my call is answered.”

“I need to call and the average hold time is 30 to 45 minutes if I am lucky – most of the time I get cut off after waiting for quite some time and ended up having to call again and start all over again.”

Staff have made efforts to address the customer concern

In response to customer concerns, Wheel-Trans staff have implemented a number of enhancements to call center operations including a recent system change to allow customers to reserve trips seven days in advance.

Our review of call center statistics and operations identified a number of other improvement opportunities:

(a) Reducing the number of calls receiving a “busy” signal

Customers were frustrated with the “busy” signal and the need to call repeatedly just to be on the “on-hold” queue

Among the customer comments we received, many were frustrated with the “busy” signal and the need to re-dial repeatedly.

One customer wrote:

“... but it is impossible to book rides over the phone – you can spend days and nights trying to get through only to get a busy signal, no message to wait in sequence. This leaves you wondering if the line is off the hook or if anyone is even there to take calls.”

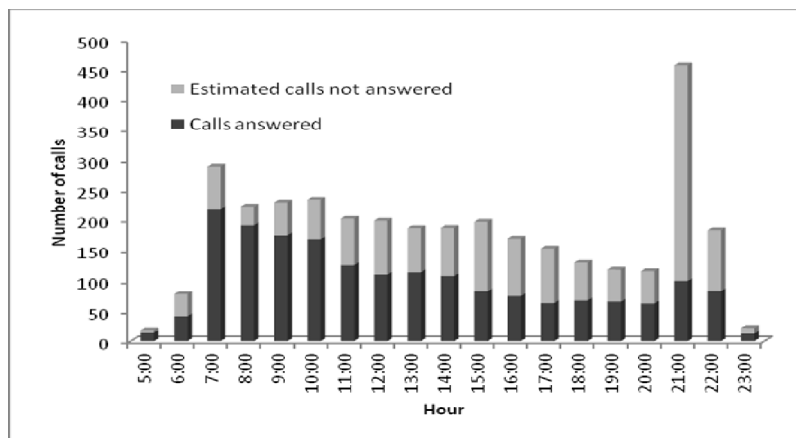
Staff indicated that they were in the process of upgrading the telephone system to reduce the number of calls encountering a busy signal. The system upgrade should alleviate the problem.

(b) Re-allocating staff resources

35% to 45% of incoming calls were not answered

As shown in Figure 5, throughout the day a significant percentage of incoming calls to the reservation line were not answered, in particular in the afternoon hours when fewer staff were on duty. On average between 35 per cent and 45 per cent of calls to the reservation line either received a busy signal or were not answered after they were put “on-hold”.

Figure 5: Reservation Line Average Call Pattern by Hour, July 8-21, 2012



Note: Although the official operating hours for the reservation line are 7 a.m. to 11 p.m., staff start answering calls as early as 5:30 a.m. to handle cancellations or last-minute trip modifications. Details pertaining to specific pick up times are not available until 9 p.m.

A dramatic increase in call volume around 9 p.m. to find out precise pick-up time

The noticeable volume spike around 9 p.m. was primarily from callers wanting to find out their 5-minute pick-up time. When customers book a trip in advance, they are initially given a 30-minute window of pick up time (e.g., 8:00 a.m. to 8:30 a.m.). The night before the scheduled trip, customers will receive an automated call between 9 p.m. and 10 p.m. to notify them of a 5-minute pick-up window (e.g. 8:10 a.m. to 8:15 a.m.).

Staffing the reservation line to handle the 9 p.m. rush is not necessary

Certain customers prefer to call the reservation line around 9 p.m. to find out their 5-minute pick-up time, even though they will be provided with the information shortly from the automated call-out system. In addition, for situations such as vehicle late arrivals, “no-show”, and other emergencies, the Wheel-Trans priority line operates until 1 a.m. to assist customers. Consequently staffing the reservation line in the late evening hours is not necessarily an efficient use of resources.

By shortening the hours of the reservation line (which is currently open until 11 p.m.), more staff resources can be allocated to the afternoon hours to increase call response capacity. Para-transit providers in Ottawa and Calgary close their reservation office at 5 p.m.

(c) Enhancing internet booking capacity

Removing the address and time restrictions on internet booking can help reduce call volume to the reservation line

Another way to improve the call center operation is to reduce call volume to the reservation line by facilitating more internet bookings. However, when booking trips on-line, customers are restricted to nine pre-determined destinations. To book a trip to a different destination or to change destination addresses, customers have to call reservation agents hence unnecessarily increasing call volume. We have been advised that Wheel-Trans staff are planning for a computer system upgrade in 2013 which will allow customers to use the internet to book trips to any address within the City. Depending on the timing of the computer system upgrade, consideration should be given to addressing this problem sooner.

Further, on-line trip bookings are restricted to the hours between 5 a.m. and 11 p.m. The time restriction was put in place to ensure customers who did not use the internet had an equal opportunity to book trips by calling the reservation agents. Since customers can now book trips seven days in advance as a result of a recent computer system upgrade, the internet time restriction is no longer warranted.

(d) Dedicating more staff resources to the priority line

Under the current Wheel-Trans policy, customers may call the priority line when their scheduled vehicle is late by 30 minutes or longer. Many customers indicated that they were not able to reach staff of the priority line.

Customers could not reach the priority line for help

“If you have a medical appointment and a ride has not shown up or you missed it, good luck trying to get through to the priority line anytime soon.”

“I waited at the back door of my apartment building where I am supposed to be waiting from 12:58 until 2:10 PM standing, trying to reach dispatcher on my cell phone, wasting my batteries and depleting my oxygen level. It is JUST IMPOSSIBLE to get through to them, which is more than upsetting and tiring, both physically and mentally.”

“Emergency dispatch number should be answered immediately or within few minutes, not after 30-40 minutes when we are already out of our home and need ride to go home.”

Over 40% of calls to the priority line were not answered

Similar to calls to the reservation line, over 40 per cent of daily calls to the priority line were not answered with the highest percentage of calls not answered during the early afternoon hours.

At the time of our audit, only one staff person was dedicated to answer calls to the priority line. It is important that customers are able to access the priority line when needed. Wheel-Trans should consider allocating more staff to the priority line to improve response time.

(e) Addressing high absenteeism rate among call center staff

Average 25 absence days per call center staff per year in 2011

Our review noted an inordinately high absenteeism rate among call center staff to the extent that it can significantly impede the daily call response capacity. On average approximately 11 per cent of staff resources at the call center were not available due to sickness or other unplanned leaves. The average absenteeism rate among call center staff was 25 days per staff member per year in 2011. Other Wheel-Trans unionized staff were absent on average 16 days per year.

In 2011 our Office conducted an audit of 311 Toronto and identified a number of improvement opportunities relating to the call center operations and high staff absenteeism rate. Since then 311 management staff have undertaken a number of steps and have recently reported success in improving call response and reducing staff absenteeism. Consequently, it may be beneficial for Wheel-Trans staff to consult with 311 Toronto on ways to improve call response capacity and reduce the level of absenteeism.

Recommendation:

- 8. The Commission request the Chief Executive Officer to review Wheel-Trans call center operations and call response capacity. Such review should include but not be limited to:**
- a. Shortening reservation line operating hours to allocate more staff resources to the afternoon hours;**
 - b. Enhancing internet booking capacity by removing the address change and time booking restrictions;**
 - c. Dedicating more staff resources to the priority line to ensure timely call response;**
 - d. Addressing the high absenteeism rate among call center staff; and**
 - e. Consulting 311 Toronto on ways to improve Wheel-Trans call center response capacity and reduce staff absenteeism rate.**

C.2. Revising Cancellation and “No-Show” Policy

Late cancellations and no-shows lead to productivity loss

According to Wheel-Trans statistics, on average nine per cent of scheduled trips are either cancelled by customers on the day of service, canceled at the door, or are a “no-show”. Last-minute cancellations cannot be re-scheduled to service other customers and are a waste of resources.

Additional \$0.5 million taxi contract costs due to late cancellations/no-shows

Under the current taxi service contracts, contracted taxi drivers are reimbursed approximately \$10 for each scheduled trip that is cancelled late or is a no-show. The additional costs due to late cancellations/no-shows were approximately \$0.5 million in 2011.

To reduce the level of late cancellations and no-shows, an effective policy is needed balancing between deterring habitual cancellations/no-shows while accommodating occasional cancellations that are beyond the control of customers.

Service providers may develop policies to address consistent late cancellations/no-shows

According to the Ministry Guidelines on the Integrated Accessibility Standards Regulation, specialized transit providers in Ontario may develop policies to address people with disabilities who consistently book services and then, without cancelling, miss the trips. The Guidelines further note that occasionally missing two trips in a row should not be regarded as “consistently missing trips”.

Wheel-Trans, with assistance from the Advisory Committee on Accessible Transit, has established a policy to discourage persistent late cancellations/no-shows. Figure 6 outlines the late cancellation/no-show rate and policy adopted by Wheel-Trans and other para-transit providers.

Increasing Flexibility of the Late Cancellation and No-show Policy

Wheel-Trans policy does not include provisions for re-consideration

The Wheel-Trans cancellation policy is similar to those of other service providers in that they all provide for an allowance for a number of missed trips, and advisory letters followed by progressive service suspensions. However, unlike other policies, Wheel-Trans does not have formalized processes for customers to request re-consideration due to circumstances beyond their control.

City of Hamilton’s policy specifies certain circumstances for legitimate late cancellation

In comparison, the City of Hamilton’s policy outlines examples of unusual circumstances beyond the control of customers that may be deemed legitimate reasons for late cancellation/no-show. These include unplanned hospitalization (certification may be required), caregivers failing to call on behalf of a customer, and incidental breakdown of a personal mobility device. The City of Hamilton’s policy was developed in 2004 as a result of an agreement reached between the City of Hamilton, the Ontario Human Rights Commission, and complainants under the Human Rights Code.

Figure 6: Key Components in Cancellation/No-Show Policies, Toronto Wheel-Trans and Para-Transit Service Providers for Other North American Cities

	Late cancellation/ no-show rate	Definition of “late cancellation”	Key components in late cancellation/no-show policy
Toronto	9%	Fail to cancel by 11:00 p.m. the day before the scheduled trip	<ul style="list-style-type: none"> • Policy allows late cancellations and no-shows up to a maximum of 4 days each month regardless of the number of trips scheduled for those days • Advisory letter sent for 1st occurrence exceeding the policy; subsequent occurrences result in incremental service suspension from 7 days to 60 days • During the service suspension, trips for medical purposes will continue to be provided
Hamilton	12%	Fail to cancel by 4:30 p.m. the day before the scheduled trip	<ul style="list-style-type: none"> • Policy applies when a customer exceeds any of the following within a calendar month: <ul style="list-style-type: none"> - Maximum 6 late cancellations - Maximum 3 no-shows - Maximum 7 combined late cancellations and no-shows - Maximum of 25% (with a minimum of 10 occurrences) of booked trips cancelled late • Advisory letter sent for 1st occurrence exceeding the policy; subsequent occurrences result in service suspension ranging from 3 to 30 days • Unusual circumstances beyond the control of the customer may be deemed to be legitimate reason and will not be subject to the policy • Customers may appeal
Calgary	2.6%	Cancel less than two hours before the scheduled pick-up window	<ul style="list-style-type: none"> • If 3 late cancellations occur in a 30-day period, a letter of warning will be issued; 6 late cancellations in a 60-day period result in 2 days service suspension; 9 cancellations in a 60-day period result in 7 days service suspension • If 12 or more late cancellations in a 60-day period, service will be reviewed with possible discontinuation of service • Customers may appeal
Washington	6.4%	Cancel less than two hours before the scheduled pick-up window	<ul style="list-style-type: none"> • Any customer within a month who has booked ten trips or more and has “no showed” or “late cancelled” at least 10% of those trips will receive a warning letter • Subsequent occurrences result in service suspension ranging from 7 to 28 days • Customer may contact the provider within two business days after the end of the calendar month to explain circumstances beyond his/her control and request the removal of violation records • Customers may appeal

Policy could be more flexible

While Wheel-Trans' current policy is in keeping with the Integrated Accessibility Standards Regulation requirement, the policy could be more flexible by including formalized processes or steps for customers to request re-consideration due to unusual circumstances.

Recommendation:

- 9. The Commission request the Chief Executive Officer, in consultation with the Advisory Committee on Accessible Transit, to review the Wheel-Trans policy regarding late cancellations and no-shows with a view to increasing its flexibility. Consideration be given to including formalized processes for customers to request re-consideration based on unusual circumstances.**

Ensuring Customers are Clear on Pick-up and Wait Time Rules

Based on our review of customer comments, certain of the no-show occurrences were likely a result of customers not being clear on pick-up and wait time rules.

Wheel-Trans has a complex set of pick-up and wait time rules

Wheel-Trans has a complex set of rules regarding pick-up and wait time:

- When customers book trips, they are initially given a 30-minute pick-up window (e.g. 8:00 to 8:30 a.m.)
- The night before the scheduled trip, customers receive an automated call giving them a 5-minute pick-up window (e.g. 8:15 to 8:20 a.m.)
- If a customer is late, the driver is instructed to wait 5 minutes past the pick-up window (e.g. until 8:25 a.m.) before posting a no-show slip
- If vehicles are late, customers are asked to wait an extra 20 minutes after the 5-minute pick-up window (e.g. until 8:40 a.m.) or they will be considered as no-show when the vehicles arrive and they are not available
- If vehicles are late more than 20 minutes past the pick-up window, customers will not be considered as no-show.

Important to ensure customers clearly understand the rules

Given the complex set of rules, customers who have repeated no-show occurrences should be contacted to ensure they have a clear understanding of the pick-up and wait time rules.

Recommendation:

- 10. The Commission request the Chief Executive Officer, in consultation with the Advisory Committee on Accessible Transit, to consider developing procedures to identify and contact Wheel-Trans customers who consistently miss their scheduled trips to ensure they have a clear understanding of the pick-up and wait time rules.**

Major system upgrade will allow customers to cancel trips up to 4 hours before scheduled trip time

According to staff, a major computer system upgrade is planned for early 2013 that will, among various benefits, enable customers to cancel trips up to four hours before their scheduled time without impacting services. This will significantly improve customer service by allowing customers a longer window of time to cancel trips when necessary.

As shown in Figure 6, service providers for Calgary and Washington allow customers to cancel trips up to two hours before the scheduled time. These providers have reported significantly lower late cancellation/no-show rates. Their late cancellation/no-show policies are also comparatively more restrictive than the Wheel-Trans existing policy.

A more restrictive policy could be justified after introducing the 4-hour cancellation allowance

After Wheel-Trans has successfully introduced the four-hour cancellation allowance, and incorporated provisions for re-consideration (as recommended in the previous section), a more restrictive policy modeling those used in Calgary and Washington should be considered.

Recommendation:

- 11. The Commission request the Chief Executive Officer, in consultation with the Advisory Committee on Accessible Transit, to consider adopting a more restrictive Wheel-Trans late cancellation and no-show policy after successfully implementing the four-hour cancellation allowance, and incorporating the provisions for re-consideration.**

D. WHEEL-TRANS OPERATED BUS SERVICES

To accommodate different types and sizes of assistive devices used by customers, the Wheel-Trans vehicle fleet consists of accessible bus, accessible taxi, and sedan taxi. Accessible taxis and sedan taxis are provided through external contracted providers.

The Wheel-Trans system is designed to schedule shared-rides where possible to maximize efficiency. To ensure the total on board time is not excessive for customers, two parameters are built into the system in scheduling shared-rides for all types of vehicle:

Parameters are set to ensure the on board time is not excessively long for any passenger

- Maximum ride time for any shared ride cannot be longer than 2.5 times the direct ride time (i.e. time it takes to travel from pick-up to drop-off without any additional shared rides), and
- Maximum on board time for any shared ride cannot exceed 90 minutes.

These parameters are comparable with those used by other para-transit providers in Canada.

Wheel-Trans overall delivery indicators are comparable with other providers

We selected four service delivery indicators to compare Wheel-Trans overall performance with other para-transit providers. The performance data, as reported by service providers, are shown in Figure 7. In general, Wheel-Trans service delivery indicators are comparable with other para-transit providers.

Figure 7: Service Delivery Performance Indicators, Selected Para-Transit Service Providers, 2011 Data

	Toronto	Hamilton	Calgary	Washington	San Francisco
Percentage of requested trips accommodated	98%	80%	99%	75%	100%
Average cost per trip	\$32	\$30	\$26	\$44	\$24
Percentage of late trips (>30 minutes late)	5%	1%	7%	1%	8%
Number of customer complaints per 1,000 trips	1.0	1.5	1.3	4.0	2.0

Among the three types of Wheel-Trans vehicle, the bus is the most expensive mode based on unit cost comparisons shown in Figure 8.

Bus is the most expensive when compared with contract taxi services

Figure 8: Comparative Unit Cost by Type of Wheel-Trans Vehicle, 2011 Data

	Total costs (\$million)	Average cost per trip	Average cost per customer	Average cost per Km
Wheel-Trans bus	\$46.8	\$45.6	\$46.0	\$5.5
Accessible Taxi*	\$22.8	\$22.2	\$18.9	\$3.2
Sedan Taxi*	\$10.7	\$27.1	\$22.1	\$3.0

* Based on payments to contractors before HST rebate

As stipulated by the current Wheel-Trans collective agreement, a minimum of 38 per cent of passenger trips are required to be delivered by Wheel-Trans operated buses.

Large wheelchairs and scooters must be transported by Wheel-Trans buses

Wheel-Trans operated buses are essential to the fleet because they are the only type of vehicle that can accommodate large wheelchairs and scooters. The Wheel-Trans scheduling system is designed to fill bus capacities first, and then assigns the remaining trips to contracted taxi providers according to passengers' assistive devices and other trip factors.

All buses are deployed from headquarters

Each day Wheel-Trans deploys between 125 and 160 buses to deliver door-to-door services. All buses are deployed from its headquarters garage located in the southeast part of the City, and return to the garage at the end of the shift. As a result, a considerable amount of time each day is spent travelling between the garage and the destinations at the beginning and the end of each shift. This is tracked as "deadhead" time associated with the first and last trips.

Average 45 minutes non-productive time per bus per shift

Based on our analysis, the average first and last trip “deadhead” travelling time is approximately 45 minutes per bus per day. This non-productive time, along with extra fuel usage, could be reduced if buses are deployed from locations closer to their first and last trip destinations.

TTC has a number of depots/garages throughout the City to deploy conventional buses for fixed-route services. According to staff, deployment of Wheel-Trans buses from existing TTC garages is not feasible at present as all garages have maximized their capacities. In future expansions of TTC facilities, the feasibility and merits of deploying Wheel-Trans buses from TTC garages should be assessed.

Our review and analysis of service delivery data identified a number of improvement opportunities for Wheel-Trans operated buses. These opportunities are illustrated as follows.

D.1. Reducing Bus Operator Overtime

\$1.9 million overtime

In 2011 Wheel-Trans incurred approximately \$1.9 million in overtime payments for bus operators. This amount is equivalent to 10 per cent of the yearly salary costs. In comparison, TTC conventional bus operators’ overtime for 2011 were approximately 8.5 per cent of yearly salary costs.

Average 15 unplanned absent days per operator per year

In the case of Wheel-Trans, overtime is largely driven by staff absenteeism and occupational injuries. The average 2011 absenteeism rate for Wheel-Trans bus operators was 15 days per operator per year.

As much as 12 per cent of operator resources are not available on a daily basis

In addition, a number of Wheel-Trans bus operators are classified as “alternate workers” who cannot perform their regular functions due to job injuries. This further depleted operator resources by 5 to 6 per cent, according to staff.

The combined loss of operator resources from absenteeism and occupational injuries can be as high as 12 per cent of the regular staff complement, thereby necessitating other staff to work overtime to deliver the required services.

Recommendation:

- 12. The Commission request the Chief Executive Officer to monitor the extent of overtime incurred by Wheel-Trans bus operators and where possible steps be taken to reduce the level of overtime.**

D.2. Monitoring Preventable Bus Collision Rate

Bus preventable collision rate has risen since 2009

Wheel-Trans preventable bus collision rate has risen from 0.93 incidents per 100,000 km travelled in 2009 to 1.22 incidents in 2011. According to staff, the increase was attributable to an increasing number of less experienced bus operators, as well as the introduction of the new “Friendly” bus since 2009. The new bus is five feet longer and seven inches higher than the previous model.

Steps have been taken to reduce the collision rate

Staff reported that steps have been taken to address the rising preventable collision rate, including recruitment of more experienced operators and improved operator training. The rate in the first six months of 2012 appears to be leveling off.

Recommendation:

- 13. The Commission request the Chief Executive Director to continue to monitor and where possible steps be taken to reduce Wheel-Trans bus preventable collision rate.**

D.3. Ongoing Monitoring of Route Scheduling

The daily bus and accessible taxi routes are scheduled by the system

Both the daily bus routes and accessible taxi routes are scheduled by Wheel-Trans recently acquired computer system. Bus operators are given a system generated “run sheet” at the beginning of their shift and are required to pick up and drop off customers according to the “run sheet”.

Some scheduled routes appeared to be inefficient according to customers

A number of customers indicated that certain of their Wheel-Trans rides “*made no sense*” in terms of route schedules and efficiency. The examples they gave included:

- *Circuitous bus routing bypassing their drop-off locations to transport another customer and then driving back to their drop-off locations*
- *Multiple buses going the same route at the same time each carrying one or two customers.*

According to these customers, although bus operators frequently agreed that some of the system scheduled routes were illogical, they were required to follow the system generated schedules.

Customers and operators should be encouraged to report apparent problems

As the current computer system has been recently acquired, problems in route scheduling may exist and may take time and efforts to identify and correct. To assist this, customers and bus operators should be encouraged to report apparent problems for further investigation by staff.

Recommendation:

- 14. The Commission request the Chief Executive Officer to monitor and refine the Wheel-Trans route scheduling system to improve efficiency. Ongoing monitoring should include processes to encourage customers and bus operators to report inefficient route scheduling for further investigation.**

D.4. Re-assessing Community Bus Routes

Wheel-Trans provides bus services on five fixed-routes

In addition to door-to-door services, Wheel-Trans provides a fixed-route service in each of the following five communities:

- Lawrence Manor
- Parkdale
- South Don Mills
- East York, and
- Central Etobicoke.

The community bus services are available to all members of the public

These fixed routes are serviced by Wheel-Trans buses which stop at locations such as shopping malls, supermarkets, and hospitals along the routes. The services are not limited to Wheel-Trans registrants. Any member of the public may board a community bus paying a regular TTC fare. Unlike TTC conventional buses, Wheel-Trans community buses can be “flagged” at any point along the route.

Ridership for community bus is low at 5 passengers per hour per bus

According to ridership statistics from January to April 2012, each community bus carries on average five passengers per hour. While this is higher than the average ridership of Wheel-Trans door-to-door buses, it is lower than the average ridership for conventional TTC buses.

Given that all of the Wheel-Trans community bus stops are also serviced by conventional TTC buses which are now fully accessible, the necessity of supplementing the conventional bus services with Wheel-Trans buses needs to be re-assessed. The community buses may be more efficiently used as a supplementary service to certain streetcar routes most of which are not accessible at present.

Recommendation:

- 15. The Commission request the Chief Executive Officer to re-assess the needs for the existing Wheel-Trans community bus routes, and cancel or develop alternate routes to ensure the services are cost efficient and effective.**

E. CONTRACTED TAXI SERVICES

In addition to buses operated directly by the TTC, Wheel-Trans contracts with the private sector for accessible and sedan taxis to service customers with small assistive devices and customers who do not use any assistive device.

Over 60% of trips were delivered by contracted taxis

Of the total 2.7 million trips provided to Wheel-Trans customers in 2011, more than 60 per cent were delivered by contracted taxis at a cost of approximately \$33 million. The percentage of trips by vehicle type is:

- Bus – 38% of trips
- Accessible taxi – 44% of trips
- Sedan taxi – 18% of trips

Both the accessible and sedan taxi contracts were awarded in 2008 for a five-year term to four taxi companies as follows:

Figure 9: Current Taxi Companies for Contracted Wheel-Trans Services

	Accessible Contract	Sedan Contract
Royal Taxi Inc.	v	
Scarborough City Cab	v	
Associated Toronto Taxi-Cab Co-Operative	v	v
Beck Taxi		v

Current contracted services are provided by four taxi companies

50 Vehicles required daily

Each accessible taxi contractor is required to provide approximately 50 vehicles daily dedicated exclusively for Wheel-Trans services. Each sedan contractor is required to provide approximately 100 vehicles each day. Unlike accessible taxis, sedan taxis may pick up fares from the public.

Taxi drivers under the accessible contracts were paid \$2.68 per km in 2011, and drivers under the sedan contracts are paid according to regular taxi meter rates.

The TTC's Internal Audit conducted a review of the taxi contracts in 2010

Prior and subsequent to awarding the taxi contracts, the TTC received complaints from various parties regarding the procurement process and contractual compliance issues. Similar complaints were received by the Auditor General's Office. In order to address certain of the concerns the TTC Audit Committee requested that the Internal Audit Division of the TTC conduct a review of certain concerns pertaining to the contracts. The report of the Internal Audit Division was tabled at an in camera meeting of the Audit Committee.

An external legal firm was retained to review contractual compliance issues

After reviewing the Internal Audit report, the Audit Committee continued to have concerns. During the In-Camera portion of the July 2010 TTC Audit Committee meeting, the Committee adopted recommendations to request the Auditor General to meet with the TTC Chief General Manager to determine a course of action to address a number of legal concerns relating to contract compliance. Following a meeting with the Chief General Manager, it was agreed that the Auditor General would independently coordinate the selection of an external legal firm to review contractual compliance issues of the TTC accessible taxi service contracts.

External review report was presented to the TTC in 2011

The Auditor General presented the results of the external legal review in a confidential report to the TTC at its May 2011 meeting. The confidential attachment contained information that is subject to solicitor-client privilege and as such remains confidential.

Focus of audit was on taxi contract costs and services

As the current taxi contracts are expiring at the end of 2013, new Requests for Proposal (RFPs) are required to continue the contracted services beyond 2013.

Our review of contractual terms and contractor services identified a number of opportunities to reduce future contract costs without impacting customer services. These issues need to be considered in developing future RFPs.

Our observations and recommendations are as follows.

E.1. Ensuring Competitive Bidding on Price Components of Each Contract

Previous RFPs did not ask proponents to bid on prices

The price components in the current taxi contracts were not determined by a competitive bidding process. Price components such as the rate for accessible taxi drivers and the monthly management/administrative fee for contractors were pre-determined by staff and prescribed in the RFP documents.

Preferred proponents were selected based on non-financial factors

Consequently, the selection and evaluation of preferred proponents was based on non-financial factors such as company experience in providing services to persons with disabilities and experience in operating a dispatch center.

In awarding the contracts in 2008, the Commission was clearly advised of the exclusion of pricing in the evaluation process.

Lack of competitive bidding on prices did not assure the best overall value

According to staff, a primary concern in designing the RFPs at the time was to ensure fairness for both the taxi drivers and the bidders, thereby necessitating pre-setting the price components in the RFPs.

While we appreciate the need for fair and equitable compensation to taxi drivers and contractors, the lack of competitive bidding on prices did not ensure that the services were procured at the best overall value for the Commission. Competitive bidding on price components should be a fundamental requirement in procurement of goods and services for the City.

Recommendation:

- 16. The Commission request the Chief Executive Officer to ensure that all future Requests For Proposal for Wheel-Trans contracted taxi services are designed to seek competitive bidding on price components as well as non-financial factors.**

E.2. Reducing Management Fees in Future Taxi Contracts

Annual management fee for each accessible contractor was approximately \$1.1 million

Under the current accessible and sedan contracts, contractors are paid monthly management or administrative fees. These fees are structured differently between the two types of contract.

Each accessible taxi contractor was paid a fixed monthly management fee of approximately \$89,000 per month in 2011, or approximately \$1.1 million per contractor per year. For three accessible taxi contractors the total management fees were \$3.3 million in 2011.

Average management fee for each sedan contractor was \$240,000 in 2011

Each sedan contractor received a management fee at 4 per cent of taxi meter receipts, which averaged approximately \$240,000 in annual payments to each sedan contractor in 2011 for a total of \$480,000 for the two contractors.

The management fee for accessible taxi contractors was stipulated in the RFP and was set by Wheel-Trans staff based on previous contract costs for accessible taxi services. The fee was meant to compensate contractors for “recruitment, training, a quality assurance program, call centre operation, on street supervision benefit plan, materials, facility costs, utilities, liability and vehicle insurance and general administrative expenses.”

Reviewed management fees

As part of our audit we reviewed the basis for the calculation of the accessible taxi contract management fee. In determining a reasonable fee to compensate contractor work, TTC staff at the time calculated the fee effectively based on two contractors sharing the accessible taxi work for the TTC with each contractor managing 75 vehicles under the new contract. However, the RFP was intended to award the work to three contractors each managing 50 vehicles. At the end of the procurement process three contractors were awarded the accessible taxi contract as intended by the RFP.

Since the intent of the RFP was to award the work to three contractors, the initial costing of management fee by staff should have been based on three contractors sharing the work, not two contractors. Had the costing been calculated based on three contractors, the fixed monthly management fee in the RFP would have been \$54,000 for each contractor, instead of \$80,000 during the first year of the contract. If the TTC had calculated the fee at \$54,000 for each contractor, it could have potentially saved approximately \$4.5 million in accessible taxi management fees over a five-year contract term.

Responsibilities of accessible and sedan taxi contracts are the same

Figure 10 provides a detailed comparison of on-going contractual responsibilities between the accessible and the sedan contractors. As can be seen the responsibilities are the same. Each accessible contractor was paid \$1.1 million in 2011, compared to approximately \$0.24 million to each sedan contractor.

Figure 10: Comparisons of Contractor Responsibilities Between the Accessible Taxi and Sedan Taxi Contracts

	Accessible Contract	Sedan Contract
Provision of sufficient staff, vehicles and drivers to operate during service hours	✓	✓
Driver recruitment & hiring	✓	✓
Driver training	✓	✓
Disciplining	✓	✓
Driver compensation	✓	✓
Each accessible taxi contractor provides run sheets to drivers prior to commencement of daily work	✓	✓
Each sedan taxi contractor ensures all work is dispatched in a timely order		
Review the run sheet manifest nightly and advise the TTC of scheduling inconsistencies prior to the start of the actual day of service	✓	✓
Minimize the amount of deadhead time ¹	✓	✓
Dispatch centre operation & supervision (to dispatch trips and respond to real-time changes in trips and incidents)	✓	✓
Ensure all scheduled work and premium trips are completed	✓	✓
Reporting to TTC no later than 15 minutes in advance of being late for any trip and/or trip unable to accommodate	✓	✓
Reporting to TTC of all complaints and incidents	✓	✓
Complaint handling	✓	✓
On-street supervision	✓	✓
Quality assurance program	✓	✓
Administration, including TTC invoicing	✓	✓
Reconciliation and storage of fare media	✓	✓
Provision of information technology infrastructure and all back-up requirements	✓	✓

¹ "Deadhead" is the distance travelled without any customers onboard during the performance of the work and where no compensation is provided by the TTC during the performance of the work.

Competitive bidding and re-structuring management fee could potentially result in significant savings

To ensure the best overall value in the next accessible contracts, the Commission should consider replacing the fixed monthly management fee for accessible taxi services with a payment scheme based on a percentage of driver service costs similar to the management fee structure in the sedan contracts.

While we cannot at this point quantify the extent of future cost savings, the annual savings could be significant.

Recommendation:

17. The Commission request the Chief Executive Officer, in developing future Request For Proposal for Wheel-Trans contracted accessible taxi services, to ensure that the monthly management fee is adequately structured to obtain the best overall value for the Commission.

E.3. Enhancing the Taxi Contract Procurement Process

Important terms and conditions in RFPs and contracts were not clearly defined

Prior to and after the award of the taxi contracts in 2008, there have been a number of concerns from various sources on the appropriateness of the procurement process. Concerns have also been expressed in relation to contract compliance. Certain of these concerns arose from inconsistencies and lack of clearly defined terms and conditions in the RFPs and contract documents. Most notably was the lack of clear definitions of the terms “driver”, “owner/operator”, and “vehicle”.

Certain of the controversies could have been avoided had a Fairness Monitor been retained for the process

Certain of the concerns and issues could have been avoided had a Fairness Monitor been retained to oversee the taxi service procurement process. In light of the funds involved and the complexity of the procurement process, it is our view that a Fairness Monitor should have been retained for the procurement of the contracted taxi services.

The benefits of retaining a Fairness Monitor to attest to the fairness and appropriateness of a procurement process were raised by the Auditor General in his 2003 report entitled “Procurement Processes Review – City of Toronto.”

City Council in 2003 endorsed the use of external fairness consultants in certain procurement processes

In response to the Auditor General's 2003 report, City Council endorsed the approach of using external fairness consultants in certain limited circumstances defined by call complexity and the likelihood of intense scrutiny such as high-profile projects.

Recommendation:

- 18. The Commission request the Chief Executive Officer to take the necessary steps to enhance the procurement process in future acquisitions of Wheel-Trans contracted taxi services. Such steps should include but not be limited to:**
- a. Ensuring all terms and conditions in the Requests For Proposal and contract documents are reviewed for clarity and consistency;**
 - b. Ensuring all concerns identified in the previous procurement process and contracts are addressed; and**
 - c. Retaining a Fairness Commissioner to oversee the entire procurement process, from finalization of the Requests For Proposal to the final award of the contracts.**

E.4. Eliminating Contractor Bonus Payments

Both of the accessible and sedan contracts provide for performance bonuses based on predetermined criteria.

Bonus payments are made based on meeting contract provisions

To be eligible for bonus payments, contractors are required to exceed 90 per cent of monthly performance ratings on factors such as on-time performance, percentage of trips accommodated, and complaint response time. Most of these performance criteria, however, are part of the contractor responsibilities as stipulated in the contracts and as a result, should not be part of any performance bonus process.

2011 bonus payments to contractors totaled approximately \$251,000

For the accessible contracts, the bonus is based on five per cent of annual management fees, for which each contractor received approximately \$53,000 in 2011. For the sedan contracts, the bonus is based on one per cent of driver service costs up to a maximum of \$50,000, and each contractor received approximately \$45,000 in 2011. The total bonuses paid in 2011 were approximately \$251,000.

We would suggest that, instead of a bonus, a financial penalty clause for inadequate performance or non-compliance with contract requirements would be more appropriate.

Recommendation:

19. The Commission request the Chief Executive Officer, in developing future Requests For Proposal for Wheel-Trans contracted taxi services, to replace the bonus entitlement with a financial penalty clause to deter inadequate contractor performance or non-compliance with contract terms and conditions.

E.5. Ensuring Contracted Taxi Drivers Are Aware of Their Rights and Responsibilities

Both the accessible and sedan contracts contain provisions regarding drivers rights and responsibilities. The contracts also prohibit contractors from charging taxi drivers any administrative fees or surcharges.

As part of our audit, we reviewed a sample of driver payment invoices and did not find any evidence of administrative charges contrary to the contracts.

Drivers should be informed of their rights and responsibilities under the contracts

Nonetheless, there are no explicit contract requirements for the contractors, or the Commission for that matter, to inform drivers of their specific rights and responsibilities, nor is there information on how drivers may report unfair contractor practices to Wheel-Trans in a confidential manner.

Recommendation:

20. **The Commission request the Chief Executive Officer, in developing future Requests For Proposal for Wheel-Trans contracted taxi services, to incorporate requirements for contractors to inform drivers of their rights and responsibilities as prescribed in the contracts, and how drivers may report inappropriate contractor practices to Wheel-Trans.**

E.6. Updating Operating Procedures

Many operating procedures have not been updated or developed

During the course of our audit, we noted that many Wheel-Trans standard operating procedures, including those relating to taxi contract administration and monitoring, were in draft form or had not been developed.

Staff advised that due to competing work demands, they have not been able to update the procedures after Wheel-Trans underwent a major system change in 2011. To help ensure consistency in operations and contract administration, standard operating procedures should be developed and updated in a timely manner.

Recommendation:

21. **The Commission request the Chief Executive Officer to develop and update Wheel-Trans standard operating procedures in a timely manner, including those relating to taxi contract administration and monitoring.**

F. NEWSLETTERS AND INFORMATION BULLETINS

Newsletters and bulletins are mailed to customers

Wheel-Trans regularly publishes and mails a newsletter called “Community Link” and an information bulletin “Wheel-Trans Reporter” to customers. These newsletters and bulletins cover topics such as safety tips, service reminders, holiday service hours, and the latest changes to policies and service provision. These publications are an important means of keeping customers informed and updated.

Over 47,000 copies were printed and mailed for each publication

In general four publications are produced per year. Each publication is mailed to Wheel-Trans “active” registrants (defined as customers who used the service at least once in the last 24 months) as well as hospitals, nursing homes, and community agencies servicing seniors and people with disabilities. In 2011, approximately 47,000 printed copies of each publication were mailed to registrants and agencies. The costs of printing and mailing were approximately \$84,000 in 2011, most of which was postage costs.

We appreciate the value of the publications, particularly for seniors who likely prefer printed materials to electronic information. However, in our view, there are opportunities for reducing the costs by:

- Allowing customers the option of receiving the publications in an electronic format;
- Reducing the mailing to registrants who used Wheel-Trans services at least once within the last 12 months. This will reduce printing and mailing by 10,000 copies per publication;
- Reducing the number of publications from quarterly to twice a year. Customers can be informed of important changes to policies and services by automated announcements when they book trips via telephone or internet; and
- Consider allowing advertisements in the publications to generate revenue.

Annual printing and mailing cost can be reduced from \$84,000 to \$35,000

By introducing these changes, it is estimated that the publications can be provided to customers at an annual printing and mailing cost of \$35,000 or less, before accounting for potential advertising revenue.

Recommendation:

- 22. The Commission request the Chief Executive Officer to reduce the annual printing and mailing costs of Wheel-Trans quarterly newsletters and bulletins to customers. Consideration should also be given to allowing advertisements in the publications to generate revenue.**

NEXT STEPS

The Auditor General conducts an annual follow-up process to determine whether or not recommendations have been implemented. The follow-up results pertaining to recommendations contained in this report will be reported to the Commission in 2014.

CONCLUSION

*Sustaining level
and quality of
services requires
new ways of
operating the
program*

With increasing demand for service and rising operating costs, Wheel-Trans is faced with the challenge of sustaining services while at the same time meeting legislative requirements and the TTC's commitment to high quality accessible transit services. The status quo is not an option in light of the significant increases in future projected service demands and costs. While this report does not provide a complete solution, it serves as a catalyst for exploring new options and ways of operating the program.

The report contains 22 recommendations. Implementation of the recommendations can help reduce operating costs without impacting the current level of services, as well as improve customer services and program efficiencies.

APPENDIX 2

**Management’s Response to the Auditor General’s
Review of Wheel-Trans Services – Sustaining Level and Quality of Service Requires Changes to the Program**

<u>Rec No</u>	<u>Recommendation</u>	Agree (X)	Disagree (X)	<u>Management Comments:</u> <i>(Comments are required only for recommendations where there is disagreement.)</i>	<u>Action Plan/ Time Frame</u>
1.	The Commission request the Chief Executive Officer, in consultation with the Advisory Committee on Accessible Transit, to explore various short-term options, including a free-ride program on a pilot basis, to encourage Wheel-Trans customers to use the accessible conventional transit system.	X		Commission Staff will explore, in consultation with the Advisory Committee on Accessible Transit, short term incentive programs, which may include free rides, to encourage Wheel-Trans customers to use the conventional transit system.	In conjunction the review to meet the required changes in AODA eligibility requirements to be in place by January 2017

<u>Rec No</u>	<u>Recommendation</u>	Agree (X)	Disagree (X)	<u>Management Comments:</u> <i>(Comments are required only for recommendations where there is disagreement.)</i>	<u>Action Plan/ Time Frame</u>
2.	<p>The Commission request the Chief Executive Officer, in consultation with the Advisory Committee on Accessible Transit, to develop and implement a comprehensive plan for integrating Wheel-Trans customers into the accessible conventional transit system. Such an action plan should include but not be limited to:</p> <ul style="list-style-type: none"> a. Identifying and addressing potential safety and service issues that can present barriers to Wheel-Trans customers in using the accessible conventional system; b. Education, communication and training programs for Wheel-Trans customers and transit passengers; and c. Customer service training to TTC staff with particular emphasis on assisting people with mobility difficulties. 	X		<p>These recommendations are effectively already actioned via the regular ongoing meetings with ACAT. The purpose of which is to progressively make the TTC system fully accessible.</p>	<p>In conjunction with the legislative requirement to have the system fully accessible by 2025.</p>

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3.	The Commission request the Chief Executive Officer to expedite the planning and implementation of an eligibility classification system for Wheel-Trans services in accordance with requirements set forth in the Integrated Accessibility Standards Regulation made under the Accessibility for Ontarians with Disabilities Act.	X		Working with the Advisory Committee on Accessible Transit we will implement the eligibility requirements set forth in the Integrated Accessibility Standards Regulation made under the Accessibility for Ontarians with Disabilities Act by January 2017, as required.	In conjunction the review to meet the required changes in AODA eligibility requirements to be in place by January 2017

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4.	<p>The Commission request the Chief Executive Officer, in consultation with the Advisory Committee on Accessible Transit, to review and enhance the Wheel-Trans eligibility assessment process and criteria to ensure that applicants’ abilities to use the conventional transit system are objectively and credibly appraised. Steps to be considered should include but not be limited to:</p> <p>a. Requiring a medical or health certification regarding mobility conditions as part of the application process;</p> <p>b. Considering the merits and cost-effectiveness of incorporating functional evaluations into the eligibility assessment process; and</p> <p>c. Evaluating the effectiveness of the assessment criteria, scoring scheme, and threshold points for eligibility.</p>	X	X	<p>We do not agree with using a medical model based on an assessment completed by a doctor advocating for a patient. As experience has shown that this invariably drives up demand rather than making it more tailored to the real need.</p> <p>We agree in principle pending a more detailed review.</p>	<p>In conjunction the review to meet the required changes in AODA eligibility requirements to be in place by January 2017</p>

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	The review should also take into consideration the process used by other providers throughout Canada and the United States.	X		We agree in principle pending a more detailed review.	In conjunction the review to meet the required changes in AODA eligibility requirements to be in place by January 2017
5.	The Commission request the Chief Executive Officer, in consultation with the Advisory Committee on Accessible Transit, to consider initiating a photo identification card program to applicants eligible for Wheel-Trans services.	X		We agree in principle pending a more detailed review.	In conjunction the review to meet the required changes in AODA eligibility requirements to be in place by January 2017
6.	The Commission request the Chief Executive Officer, in consultation with the Advisory Committee on Accessible Transit, give consideration to the establishment of a policy to discourage repetitive late cancellations and “no-shows” for Wheel-Trans eligibility assessment or appeal appointments.	X		We agree in principle pending a more detailed review.	The review will be completed by Fall 2013

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7.	The Commission request the Chief Executive Officer to develop and implement procedures to maintain an up-to-date Wheel-Trans registrant database. Steps should also be taken to systematically identify and cancel inactive passes in a timely manner.	X			To be implement in January 2013.

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8.	<p>The Commission request the Chief Executive Officer to review Wheel-Trans call center operations and call response capacity. Such review should include but not be limited to:</p> <ul style="list-style-type: none"> a. Shortening reservation line operating hours to allocate more staff resources to the afternoon hours; b. Enhancing internet booking capacity by removing the address change and time booking restrictions; c. Dedicating more staff resources to the priority line to ensure timely call response; d. Addressing the high absenteeism rate among call center staff; and e. Consulting 311 Toronto on ways to improve Wheel-Trans call center response capacity and reduce staff absenteeism rate. 	X		We agree in principle pending a more detailed review.	The review will be completed by Fall 2013

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9.	The Commission request the Chief Executive Officer, in consultation with the Advisory Committee on Accessible Transit, to review the Wheel-Trans policy regarding late cancellations and no-shows with a view to increasing its flexibility. Consideration be given to including formalized processes for customers to request re-consideration based on unusual circumstances.	X		In consultation with the Advisory Committee on Accessible Transit, customers will be notified of the process to request re-consideration of violations of the cancellation and no show policy based on unusual circumstances.	Fall 2013
10.	The Commission request the Chief Executive Officer, in consultation with the Advisory Committee on Accessible Transit, to consider developing procedures to identify and contact Wheel-Trans customers who consistently miss their scheduled trips to ensure they have a clear understanding of the pick-up and wait time rules.	X		We agree in principle pending a more detailed review.	Review to be completed by mid 2013

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11.	Commission request the Chief Executive Officer, in consultation with the Advisory Committee on Accessible Transit, to consider adopting a more restrictive Wheel-Trans late cancellation and no-show policy after successfully implementing the four-hour cancellation allowance, and incorporating the provisions for re-consideration.	X		We agree in principle pending a more detailed review.	The review will be completed following changes to the trip booking and scheduling system currently targeted for Fall 2013.
12.	The Commission request the Chief Executive Officer to monitor the extent of overtime incurred by Wheel-Trans bus operators and where possible steps be taken to reduce the level of overtime.	X		We agree in principle pending a more detailed review.	Review will be incorporated as part of the 2014 budget cycle
13.	The Commission request the Chief Executive Director to continue to monitor and where possible steps be taken to reduce Wheel-Trans bus preventable collision rate.	X		Wheel-Trans currently have KPI to monitor Wheel-Trans bus collisions and programs to reduce preventable accidents.	Ongoing

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14.	The Commission request the Chief Executive Officer to monitor and refine the Wheel-Trans route scheduling system to improve efficiency. Ongoing monitoring should include processes to encourage customers and bus operators to report inefficient route scheduling for further investigation.	X		A process already exists for bus operators to report scheduling inefficiencies and customers provide input using the customer service comments process	Ongoing
15.	The Commission request the Chief Executive Officer to re-assess the needs for the existing Wheel-Trans community bus routes, and cancel or develop alternate routes to ensure the services are cost efficient and effective.	X		This study is currently in progress	To be included as part of the 2014 budget cycle.
16.	The Commission request the Chief Executive Officer to ensure that all future Requests For Proposal for Wheel-Trans contracted taxi services are designed to seek competitive bidding on price components as well as non-financial factors.	X		We agree in principle pending a more detailed review.	In conjunction with issuing new Requests for Proposals.

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17.	The Commission request the Chief Executive Officer, in developing future Request For Proposal for Wheel-Trans contracted accessible taxi services, to ensure that the monthly management fee is adequately structured to obtain the best overall value for the Commission.	X		We agree in principle pending a more detailed review.	In conjunction with issuing new Requests for Proposals.

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18.	<p>The Commission request the Chief Executive Officer to take the necessary steps to enhance the procurement process in future acquisitions of Wheel-Trans contracted taxi services. Such steps should include but not be limited to:</p> <p>a. Ensuring all terms and conditions in the Requests For Proposal and contract documents are reviewed for clarity and consistency;</p> <p>b. Ensuring all concerns identified in the previous procurement process and contracts are addressed; and</p> <p>c. Retaining a Fairness Commissioner to oversee the entire procurement process, from finalization of the Requests For Proposal to the final award of the contracts.</p>	X		We agree in principle pending a more detailed review.	In conjunction with issuing new Requests for Proposals.

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19.	The Commission request the Chief Executive Officer, in developing future Requests For Proposal for Wheel-Trans contracted taxi services, to replace the bonus entitlement with a financial penalty clause to deter inadequate contractor performance or non-compliance with contract terms and conditions.	X		We agree in principle pending a more detailed review.	In conjunction with issuing new Requests for Proposals.
20.	The Commission request the Chief Executive Officer, in developing future Requests For Proposal for Wheel-Trans contracted taxi services, to incorporate requirements for contractors to inform drivers of their rights and responsibilities as prescribed in the contracts, and how drivers may report inappropriate contractor practices to Wheel-Trans.	X		We agree in principle pending a more detailed review.	In conjunction with issuing new Requests for Proposals.

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21.	The Commission request the Chief Executive Officer to develop and update Wheel-Trans standard operating procedures in a timely manner, including those relating to taxi contract administration and monitoring.	X		Standard operating procedures are currently being updated to reflect the changes resulting from the upgrade to the scheduling system and those relating to the taxi contract administration and monitoring.	Mid 2013
22.	The Commission request the Chief Executive Officer to reduce the annual printing and mailing costs of Wheel-Trans quarterly newsletters and bulletins to customers. Consideration should also be given to allowing advertisements in the publications to generate revenue.	X		We agree in principle pending a more detailed review.	To be included as part of the 2014 budget cycle.