**OFFICE OF
THE CITY AUDITOR**

REPORT
DEDICATED ACCESSIBLE
TRANSIT SERVICE (DATS) AUDIT

JANUARY 30, 2025

Report Summary

BACKGROUND

The Dedicated Accessible Transit Service (DATS) team, within the Edmonton Transit Service (ETS) Branch, provides the City of Edmonton's paratransit service. DATS provides door-to-door, shared-ride public transportation for people with physical or cognitive impairments who cannot use conventional transit.

DATS' vision for paratransit service is to provide industry leading and sustainable specialized transportation solutions that connect people, resources, and communities. It aims to provide service that is rider focused, safe, and reliable.

AUDIT OBJECTIVE & SCOPE[1]

The objective of this audit was to determine if the Edmonton Transit Service Branch manages paratransit service effectively and efficiently to serve Edmontonians who are unable to use conventional transit.

The scope of this audit included paratransit service provided by DATS since January 1, 2023. We used additional historical information outside of this timeframe to carry out specific procedures.

WHAT WE FOUND[2]

Overall, ETS partially met the audit objective of managing paratransit service effectively and efficiently to serve Edmontonians who are unable to use conventional transit. We found ETS can improve DATS' eligibility assessment process, privacy controls, contract management practices, strategic planning, data quality, and training.

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[1] We conducted this engagement in conformance with the Institute of Internal Auditors' *Global Internal Audit Standards*.

[2] The Institute of Internal Auditors' *Global Internal Audit Standards* require us to report the significance and prioritization of our findings. This report contains all our significant findings and those that we deemed not significant, but that still support our recommendations. We prioritized each significant finding based on how important it is that management address the finding. This report contains only those significant findings that we prioritized as management must address or should address.

DATS has several strengths:

- It has clearly defined its mission, vision, and values, as well as management roles and responsibilities.
- It effectively uses technology and tools to manage its operations.
- It regularly tracks numerous operational measures and holds regular management meetings to discuss issues and risks.
- It maintains positive working relationships with their contracted service providers.
- Staff generally feel well-equipped to perform their duties.
- Achieved 93 percent overall client satisfaction in 2023.
- Delivered 93 percent of the 850,000 trips taken in 2023 on time.

However, we found the following areas where DATS can improve its effectiveness or efficiency:

- Eligibility assessment process - DATS' documented eligibility assessment guidelines have not been updated since 2018. DATS registration agents do not directly refer to the assessment guidelines when processing applications for the service. After approving or denying eligibility, the DATS team does not formally review whether its decision complies with the guidelines. This increases the risk of inconsistent decisions about who can access the service. We found there were no instances where registration agents unfairly denied an applicant access to the service.
- Privacy controls - There are weaknesses in DATS' password security and information retention practices. These weaknesses increase the risks around safeguarding the City's data and information. This risk is limited to the 130 City employees with access to the paratransit software.

- Contract management practices - The DATS team is monitoring whether contractors meet some, but not all of the minimum performance standards of their contracts. DATS has not charged service assessments when contractors do not meet these standards. The DATS team does not have a second individual review and approve contractor invoices, and we found invoicing errors.
- Strategic planning:
    - DATS has two key performance indicators with targets. However DATS has not set goals, linked operational measures to them, and developed targets for the measures. This makes it more challenging for DATS to measure progress toward achieving its mission.
    - DATS management participates in a Branch-level risk assessment. However, the DATS team does not have a regular, documented risk assessment process specific to the paratransit service. Consequently, ETS has not formally identified, assessed, addressed, and monitored critical risks unique to paratransit.
    - DATS has not evaluated its service model since it added contracted service providers in 2019, despite having renewed these contracts since then. DATS has not set a timeframe for future service model reviews. Doing so would help DATS evaluate whether the model provides the best value for money while maintaining quality service.
- Data integrity - The DATS team is not using sufficient data validation controls or data quality assurance processes to ensure the data in its paratransit software is accurate, consistent, and complete.
- Training - The DATS team provides extensive training to its staff. However, training materials for some roles are

outdated and DATS does not formally track whether these staff have completed training. Up to date training will equip staff with the necessary skills and knowledge to provide excellent service to DATS clients.

RECOMMENDATIONS

Recommendation 1   We recommend that DATS update and use documented assessment guidelines for making eligibility decisions, and formally review these decisions to provide fair and consistent access to the service for those who need it.

Recommendation 2   We recommend that DATS update password requirements and destroy sensitive information in accordance with City rules to better safeguard City data.

Recommendation 3   We recommend that DATS improve how it monitors contractors and apply additional formal controls to help enforce contract terms and conditions.

Recommendation 4   We recommend that DATS have a second individual review and approve contractor assessments and invoices to reduce errors.

Recommendation 5   We recommend that DATS improve its strategic planning by:

- Enhancing its performance measurement framework to include clearly defined goals, measures, and targets to achieve its mission and vision.
- Conducting regular risk assessments at the paratransit level to identify and address relevant risks.

Recommendation 6   We recommend that DATS regularly review its service model to optimize value for money and service quality.

Recommendation 7   We recommend that DATS implement data validation controls and a data quality assurance process, to regularly review data

accuracy and completeness to help make evidence-informed decisions.

Recommendation 8   We recommend DATS update its training materials and formally track training completion to equip staff with the necessary skills and knowledge to provide excellent service.

WHY THIS IS IMPORTANT   Continuously improving the effectiveness of DATS will help ETS to better fulfill DATS' mission of providing industry-leading, sustainable, and rider-focused paratransit service to the Edmonton community. DATS clients relying on this service will benefit from these improvements.

Dedicated Accessible Transit Service Details

DEDICATED ACCESSIBLE TRANSIT SERVICE (DATS)

DATS is part of the Bus and Security Operations Section within the City's ETS Branch. The Paratransit Manager and four supervisors manage the DATS team.

Figure 1: Dedicated Accessible Transit Service Team
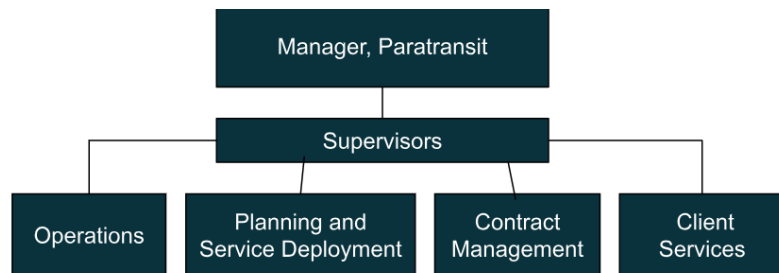
The four components of providing DATS service are:

1. Operations - Delivers trips, including pre-trip planning, day-to-day functions, and garage coordination.
2. Planning and Service Deployment - Schedules trips and dispatches operators.
3. Contract Management - DATS' service model uses a mix of in-house staff and third-party contractors to provide trips to its clients. This section oversees the contracts with third party providers (i.e., taxis, private companies).
4. Client Services - Responsible for registration and eligibility, bookings, call centre, and community relations.

DATS has a budget of $32 million for 2024. This is funded primarily through the City of Edmonton tax levy, and partially through fare revenue from DATS clients.

The following table provides additional information on DATS:

Table 1: DATS Information

DATS Information	2023 Actual
Requested trips fulfilled	98%
On-time performance*	93%
Client satisfaction rate	93%
Number of in-house DATS drivers	143
Number of in-house DATS buses	101
Number of trips provided	857,177 (462,708 of these were provided by contractors - 54%)
Net expenses (tax levy supported)	$29 million
Total number of DATS staff	230

Source: 2023-2024 ETS Annual Service Plan

*On-time performance means that a client is picked up within fifteen minutes of the time they requested. This figure shows the percent of trips that were delivered on time.

KEY DIFFERENCES FROM CONVENTIONAL TRANSIT

Paratransit service differs from conventional transit service in several ways. See Table 2.

Table 2: Differences Between Conventional Transit and Paratransit

Feature	Conventional Transit	Paratransit
Routes	Fixed	Variable (demand-based)
Schedules	Fixed	Variable (demand-based)
Stops	Fixed - riders go to existing stops	Variable - almost any address can be a stop
Vehicles	Buses and light rail	Smaller vehicles with additional accessibility features
Eligibility	No criteria - everyone that can use the service is eligible	Riders must meet eligibility criteria to use the service
Cost of	Slightly greater than	Much greater than fare

service	fare revenue (ETS cost per trip for Jan to Oct 2024 is $7.03)	revenue (DATS cost per trip for Jan to Oct 2024 is $35.46)

Sources: Adapted from Canadian Urban Transit Association - Module 1: Introduction to Specialized Transit course materials, with cost per trip figures from the ETS KPI Dashboard.

PARATRANSIT SOFTWARE

The DATS team uses paratransit software to help deliver the service. The software consists of different linked modules that correspond to the different business functions within DATS. For example, there are modules for client registration, booking, scheduling, dispatch, and complaints and commendations.

DATS staff have a user profile that limits their access to only those modules they need to perform their job.

CONTRACTORS

DATS has contracts with service providers to perform some of the requested trips. These include a dedicated provider, whose drivers only work on DATS trips, and two non-dedicated providers, whose drivers do a mix of their own private trips and DATS trips (e.g., taxis).

Contractors are responsible for verifying that their drivers and vehicles meet contractual requirements.

Additionally, contracts include a service assessments section that lists the minimum performance standards such as on time performance and service interruptions.

Improve Eligibility Assessment Process

KEY FINDINGS

Many aspects of the DATS team's eligibility assessment process follow best practices. These include:

- DATS staff perform pre-screening. Potential applicants must call DATS to get the application form. During this call, DATS staff inform them of their transit options. This helps potential applicants decide whether they believe they are eligible for DATS service before applying.
- The application form asks relevant questions to determine an applicant's functional ability, and this is corroborated by a health professional's assessment. Examples of questions include how far the applicant can mobilize, whether they can transfer buses, or plan a travel route.
- In cases where applicants do not clearly meet eligibility criteria, DATS staff send them to a qualified, third-party occupational therapist. The occupational therapist conducts in-person interviews with applicants and gives DATS staff their eligibility recommendation. If applicants do not have transportation to this assessment, DATS provides it at no cost to the applicant.
- The DATS team processes applications efficiently, with over 88 percent of applications processed within 30 days. From January 1 to August 12, 2024, DATS processed 1,284 applications with an average processing time of 9 days. DATS approved almost all (more than 99 percent) of these applicants for some level of service.

We found that DATS has documented procedures and assessment guidelines to help staff determine eligibility. However, DATS has not updated these procedures since 2018

and staff are not using them. Additionally, DATS does not regularly review eligibility decisions for consistency.

OUTDATED AND UNUSED ELIGIBILITY ASSESSMENT GUIDELINES

DATS has documented procedures and assessment guidelines to determine eligibility. However, DATS has not updated these guidelines since 2018 and DATS staff are not referring to them directly when making eligibility decisions.

DATS has three broad eligibility criteria:

- Must be over 16 years of age
- Must reside in Edmonton
- Must not be able to use conventional transit for some or all trips, due to a physical or cognitive disability

Determining eligibility can be complex. For some applicants, DATS staff may find it difficult to determine whether they can or cannot use conventional transit based only on their application form. In cases where an applicant is not clearly eligible for service based on the guidelines (approximately 30 percent of applicants), DATS staff send the applicant for an in-person interview with a qualified occupational therapist. The occupational therapist assesses the applicant's functional abilities, and gives DATS their summary assessment and their eligibility recommendation.

For 70 percent of applicants, DATS staff approve eligibility without sending them to the occupational therapist. DATS staff members making this decision do not have a medical background, nor does their job description require it. In the absence of this expertise, documented guidance for making eligibility decisions becomes more important.

DATS has documented assessment guidelines to help determine eligibility. These guidelines also help determine when an applicant needs an occupational therapist interview. However, the guidelines have not been updated since 2018 and DATS staff are not directly referring to them when making eligibility decisions. Instead they make decisions using their judgement based on the details in the application form. These

guidelines are also not part of DATS staff's documented training. We found that DATS staff were unaware of the guidelines and where to find them.

From January 2021 to August 2024, DATS has denied service to only one individual without an occupational therapist interview. In this case, the individual had mobility equipment that was too large to fit on a DATS vehicle. DATS later approved this individual when they re-applied after changing their mobility equipment.

ELIGIBILITY DECISIONS ARE NOT FORMALLY REVIEWED

DATS does not formally review eligibility decisions to verify their accuracy and consistency. Informally, decision makers can ask their supervisor for advice. The supervisor stated they perform spot checks over decisions. However, these checks are not documented.

WHY THIS IS IMPORTANT

DATS eligibility decisions drive service cost and demand, which impacts service availability. Reduced availability can result in other clients being denied trips or having long wait times to book trips. Inaccurately or inconsistently approving clients unfairly impacts those clients who truly need the service.

Clear guidance and a formal review process helps improve the accuracy and consistency of eligibility decisions. Accurate and consistent eligibility decisions keep the service equitable and sustainable by making sure DATS only provides service to those who need it.

RECOMMENDATION 1

> Update and use documented assessment guidelines for making eligibility decisions, and formally review these decisions to provide fair and consistent access to the service for those who need it.

Responsible Party

Branch Manager, Edmonton Transit Service

Accepted by Management

Management Response

Administration will document guidelines, refresh training materials for staff, and establish practices for an eligibility quality assurance program.

Implementation Date

June 30, 2025

Improve Privacy Controls

KEY FINDINGS

DATS staff collect personal and medical information from their clients during the eligibility process. DATS has some controls to protect this information. These include:

- The Paratransit Manager approves all access requests to the paratransit software.
- Access to particular modules is based on the staff's role.
- DATS clients' personal information is mainly housed in the client registration module, within the paratransit software. All current staff who have access to this module require it to perform their jobs.

However, we found the following issues with DATS' data privacy controls:

- Usernames and passwords used to access the paratransit software are weak and easily guessable. They follow a set template; this template is available to registration, booking, scheduling, client relations, and dispatch staff.
- The City's Classification and Retention schedule states that DATS staff should destroy non-transitory personal information of transit clients 6 years after last use. DATS staff destroyed some paratransit software data in 2022. However, DATS has not destroyed personal information within the software's client registration module since the software was implemented in 2008.

WEAK, EASILY GUESSABLE USERNAMES AND PASSWORDS

DATS staff use weak and easily guessable usernames and passwords to access the paratransit software. These are based on staff's names and an internal template, making them weak and easy to guess. As well, DATS includes the username and password template within the registration, booking, scheduling, dispatch, and client relations training manuals.

Approximately 130 City staff have access to the paratransit software. Individuals with access to this software could easily impersonate others to gain access to modules they do not need for their roles, including the client registration module which houses DATS clients' personal information.

NONCOMPLIANCE WITH CITY DATA RETENTION REQUIREMENTS

DATS is not destroying all of the client information stored in the paratransit software in compliance with the City's data retention schedule.

The City's Classification and Retention Schedule describes how to manage records and information. It classifies and assigns rules to all corporate records, regardless of medium or format. For personalized transit programs, including DATS, the rules state that the City should destroy client personal information six years after they last use it, or after they mark a client as inactive.

We found that DATS has not destroyed client information stored in the paratransit software's client registration module since its implementation in 2008.

This module contains:

- Client name
- Date of birth
- Address
- Phone number
- Whether they have a physical or cognitive disability, or both
- Emergency contact:
  - Name
  - Phone number
  - Relation to the client

Currently, the module houses information on over 40,000 individuals, despite over 27,000 of them being marked as inactive DATS clients.

WHY THIS IS IMPORTANT

Effective privacy controls protect clients' personal information from unauthorized access and accidental disclosure.

The paratransit software contains the personal information of over 40,000 individuals. Inappropriate use of this information could cause them harm and expose the City to legal and reputational risks.

RECOMMENDATION 2

Update password requirements and destroy sensitive information in accordance with City rules to better safeguard it against unauthorized use.

Responsible Party

Branch Manager, Edmonton Transit Service

Accepted by Management

Management Response

Administration is working with the software vendor to implement an updated password system that would utilize the users' existing network credentials, which has password complexity and expiration requirements managed by Open City and Technology.

Open City and Technology is collaborating with the software vendor to implement an automated deletion of records for clients who have been inactive for more than six years. This aligns with existing data retention policies and improves data security by preventing the unnecessary storage of outdated information.

Implementation Date

December 31, 2025

Improve Driver and Vehicle Provider Contract Management

KEY FINDINGS

DATS regularly communicates with its contracted driver and vehicle providers (contractors) and maintains a positive working relationship with them. Each contractor has a contract management plan, which clearly defines roles and responsibilities, and how DATS staff will monitor the contract. DATS performs and documents random rider service checks on its contracted drivers. DATS staff also track contractor-related complaints and discuss them weekly with contractors.

However, we found the following areas where DATS can improve how it manages its contractors:

- DATS is monitoring whether contractors meet some, but not all the agreed upon contractual performance standards. Per the contracts, failing to meet these standards will result in DATS charging service assessments. DATS has not charged these assessments despite the contractors repeatedly not meeting performance standards.
- DATS does not document the results of contractor vehicle inspections and monthly site visit audits.
- There is no secondary review over contractor invoicing. Contractors have made invoicing errors. We found two types of invoicing errors in our testing, which could have been caught by a secondary review. DATS has corrected one of them.

NOT FORMALLY MONITORING SOME CONTRACTUAL REQUIREMENTS

DATS monitors some but not all of the contractual performance standards in its contracts. DATS does not have a formal process to compare contractor performance against all of the minimum performance service standards included in the contracts.

Table 3 provides examples of these performance standards, targets, and the service assessment for non compliance.

Table 3: Sample of Contractual Performance Standards, Targets, and Service Assessments for Non-Compliance

Performance Standard	Target	Service Assessment
On time trip performance	92% of trips are on time (within 30 minute pickup window)	Assessment for contract renewal purposes only
Service interruptions	Less than 1.5 incidents per 1000 trips delivered	$100 per incident above the target
Non-performance of trips	Zero non-performance of trips	$100 per trip
Rider substantiated concerns per 1000 trips	0.25 substantiated concerns per 1000 trips	$100 per substantiated concern above the target

DATS staff are collecting the necessary information to monitor contractor performance against these standards. However, they do not have a formal process to do so.

The contracts also state that the City will charge service assessments if the contractors do not meet the minimum performance standards. However, DATS has never charged these assessments, despite contractors not meeting the standards.

UNDOCUMENTED INSPECTION RESULTS

DATS staff are not documenting the results of contractor office site visits and on-road vehicle inspections.

DATS staff conduct monthly site visits at the contractors' offices. During these visits DATS staff will spot check documentation for

one to two drivers and/or vehicles. Driver documentation shows whether a driver has completed training, has a current vulnerable sector check, and has a valid licence. Vehicle documentation shows whether the vehicle has a commercial vehicle inspection certificate, a maintenance log, its registration, and its insurance. DATS management states these checks are happening, but they do not document the results.

DATS staff also perform weekly on-road inspections of contracted drivers and vehicles. The staff are documenting driver inspections but not vehicle inspections.

LACK OF REVIEW OVER CONTRACTOR INVOICES

Every month, DATS staff reconcile contractor invoices to paratransit software data. However, a second DATS staff member does not review this reconciliation. We found contractors have made invoicing errors.

DATS staff use hours data within the paratransit software to reconcile contractor invoices. They use the hours to calculate what they expect the contractors to bill each month then compare it to the contractor's invoice. If the contractor's invoice matches DATS' expected invoice amount, DATS staff approve payment. However, we found that the same individual who prepares the reconciliation is also approving payment. The preparer and the approver should be different staff members so that the approver can review the reconciliation.

With additional oversight, DATS may have prevented the following contractor invoice errors:

- For one contractor, we found the same GST-related invoicing error on all six of the monthly invoices we sampled. This error resulted in the City underpaying the contractor approximately $40,000.
- For another contractor, we found an error in one of the six months we sampled. DATS had underpaid this contractor almost $8,000 because the invoiced hours did not match DATS data. This error was caught and corrected in the subsequent month, however, it was the

contractor who discovered it, not DATS.

WHY THIS IS IMPORTANT

By improving contractor performance monitoring, DATS management can better identify and correct performance issues, leading to better service quality.

Applying service assessments when appropriate makes sure the City does not pay more than it needs to for the service received, and holds the contractor accountable for meeting requirements, as set out in the agreed upon contractual terms.

A review of contractor assessments and invoices would help identify and correct any errors if they occur.

RECOMMENDATION 3

Improve how it monitors contractors and apply formal controls to help enforce contract terms and conditions.

Responsible Party

Branch Manager, Edmonton Transit Service

Accepted by Management

Management Response

Based on preliminary findings from the audit, Administration has responded by implementing monthly reviews of service checks to ensure service checks and vehicle inspections are being appropriately documented. The DATS Contract Coordinator now maintains a log of all site visits and training audits conducted. These changes have been implemented.

Service assessments for contractor performance thresholds will be formally reviewed and contracts will be amended to reflect best practice.

Implementation Date

September 30, 2025

RECOMMENDATION 4

Have a second individual review and approve contractor assessments and invoices to reduce errors.

Responsible Party

Branch Manager, Edmonton Transit Service

Accepted by Management

Management Response

DATS is amending the internal payment approval process in the procurement and invoice management system to require a second formal approver for monthly payments. Administration will document and adjust the processes of contractor assessments to include a secondary review of contractor invoicing.

Implementation Date

December 31, 2025

Improve Strategic Planning

KEY FINDINGS

DATS management has some elements of effective strategic planning. These include:

- Clearly defining their mission, vision, and values.
- Clearly defining DATS management roles and responsibilities.
- Regularly tracking numerous operational measures.
- Holding daily, weekly, and monthly management meetings to discuss issues and risks.
- Two key performance indicators with targets.

However, DATS management could improve its strategic planning in the following areas:

- DATS is missing elements of a comprehensive performance measurement framework. DATS has not clearly defined its goals. It has not linked existing measures to these goals and has not developed targets for these measures.
- Though ETS performs a formal risk assessment at the Branch level, DATS does not regularly perform its own paratransit-specific risk assessment. Consequently, DATS has not formally identified, assessed, addressed, and monitored critical risks unique to paratransit.
- DATS has not evaluated its service model since it added contracted service providers in 2019, despite having renewed these contracts since then. DATS has not set a timeframe for future service model reviews.

MISSING ELEMENTS OF A PERFORMANCE MEASUREMENT FRAMEWORK

DATS is missing elements of a comprehensive performance measurement framework. It has not established clear goals aligned with its mission and vision, nor has it linked existing operational measures to these goals. Additionally, the absence of targets for these measures hinders DATS's ability to

effectively evaluate its service effectiveness and progress towards its mission and vision.

Lack of Goals

DATS' vision is to be industry leading and sustainable. Its mission is to provide rider-focused, safe, and reliable service. DATS and ETS management state they are committed to providing accessible transportation, with barrier-free services that make transit easy and convenient for everyone. However, DATS does not have goals to measure its success in achieving its vision and mission.

For example, DATS has not defined its goals for safety, rider service experience, equity, and service flexibility.

Lack of Targets

Though DATS tracks operational measures, it has not established targets for them.

DATS does not have formal targets for its measures, including:

- Preventable collisions
- Average ride time
- Trips per hour
- Cost per trip

For example, a target for preventable collisions could serve as a trigger for when to investigate whether multiple collisions share a root cause. Perhaps analyzing collision data could reveal patterns related to specific weather conditions, such as the initial period following snowfall when icy conditions are more prevalent. This insight could enable DATS to implement targeted safety campaigns to address these specific risks and potentially reduce the occurrence of preventable collisions.

NO FORMAL RISK ASSESSMENT

Annually, ETS performs a formal risk assessment at the Branch level. However, DATS management does not perform a risk assessment at the paratransit level. Though some risks are included at the Branch level, other critical risks unique to

paratransit are not. Examples of DATS risks include rider safety, accessibility, legal or human rights claims, and client privacy.

NO REGULAR REVIEW OF SERVICE MODEL

The DATS team does not regularly review its service model, nor has it set a timeframe for when this review should happen.

In 2019, DATS changed its service model to include contracted service providers. DATS signed contracts with three external service providers. While DATS renewed the contracts after three years, it has not conducted further evaluations of its service model since then. DATS has not set a timeframe for future reviews of the model to make sure it provides best value for money and maintains service quality.

DATS' service model maximizes in-house availability and uses contracted services to pick up additional trips. Currently this is approximately a 50/50 split of in-house (City) and contracted drivers and vehicles to deliver trips for its clients. DATS does not have a documented framework, including inputs and decision making criteria to evaluate and justify this split.

DATS management stated they cannot change the service model due to garage constraints, employment considerations, and contractors' limited ability to serve non-ambulatory clients. However, without regular evaluation, DATS management does not know which of these concerns to address, if any, in order to provide more cost-effective and better service to its clients.

WHY THIS IS IMPORTANT

A comprehensive performance measurement framework including clearly defined goals, measures, and targets helps DATS align actions to achieve its mission and vision.

Regular risk assessment helps DATS identify, assess, address and monitor paratransit-specific risks.

Regularly reviewing the service model can help DATS maximize value for money and maintain or improve service quality.

RECOMMENDATION 5

Improve its strategic planning by:

- Enhancing its performance measurement framework to include clearly defined goals, measures, and targets to achieve its mission and vision.
- Conducting regular risk assessments at the paratransit level to identify and address relevant risks.

Responsible Party

Branch Manager, Edmonton Transit Service

Accepted by Management

Management Response

Administration will document clearly defined goals, measures and targets, and better integrate these in Enterprise Performance Management processes within the Edmonton Transit Service Branch. Administration will establish a paratransit-specific risk register and the implementation of annual risk register exercises.

Implementation Date

September 30, 2025

RECOMMENDATION 6

Regularly review its service model to optimize value for money and service quality.

Responsible Party

Branch Manager, Edmonton Transit Service

Accepted by Management

Management Response

Administration will document the considerations it will make and complete a review of the paratransit service design every four years prior to the City of Edmonton's four year business and budget planning cycle.

Implementation Date

December 31, 2025

Improve Data Quality

KEY FINDINGS

The DATS team tracks many operational measures using data from its source systems. Some of these measures were calculated accurately and completely, including:

- Average call wait time
- Abandoned call rate
- Average ride time
- On-time performance
- Total number of passengers

However, DATS does not use sufficient data validation controls to verify that data entry is accurate and complete. DATS also does not have a data quality assurance process to regularly review its data to identify and correct errors.

INSUFFICIENT DATA VALIDATION CONTROLS

DATS uses insufficient data validation controls to prevent data entry errors. Data validation controls help improve accuracy and completeness when data is entered into a system. The table below explains some of them and how they could prevent errors we encountered in our testing.

Table 4: Data Validation Controls Applied to DATS Examples

Control	Description	Examples Identified
Range check	Data should be within a predetermined range of values.	One client with visitor eligibility, which should have expired in 21 days, had an expiry date 5 years out. DATS could use a range check to make sure registration agents cannot enter an expiry date beyond 21 days for a client granted visitor eligibility.
Completeness check	A field should always contain data (mandatory field)	25 percent of complaints had no investigator comments, and 56 percent of comments did not record whether the complaint was substantiated. DATS could use a completeness check to make sure client relations agents complete these fields before closing a complaint.
Logical	If a particular condition	Some existing clients had multiple "New Application"

relationship check	is true, then another condition must be true for the input to be valid.	entries on their file. DATS could use a logical relationship check to make sure that if a client already has a "New Application" entry on their file, registration agents can only code subsequent applications as Recertification.

In each of the cases above, implementing the controls could help DATS improve data accuracy and completeness.

NO DATA QUALITY ASSURANCE PROCESS

We also found that DATS does not have a data quality assurance process to regularly review its data to identify errors or omissions.

Data quality assurance is the systematic process of making sure data meets defined quality criteria. It can include:

- Automated data quality checks
- Regular data audits
- Fostering a data-driven culture

A data quality assurance process might have caught and corrected the following data issues:

- DATS tracks its same-day accommodation rate. This is the percentage of trips accommodated out of all same day trip requests. The formula to calculate same-day accommodation rate was incorrect, which resulted in underreporting the rate. DATS had been underreporting the rate since 2021, and the average difference was approximately 20 percent.
- DATS classifies complaints by responsible parties - City operators or contractors. DATS created an algorithm to take the available information in these complaints and determine the responsible party. However, this algorithm was not accurate and did not assign a responsible party to over 20 percent of complaints. As a result, DATS did not include these complaints in the complaints per 1,000 trips measure. DATS uses this measure to evaluate service quality and should be using

it to calculate the service assessments to charge its contractors. Underreporting complaints means DATS may believe service quality to be higher than it actually is and may result in lower and inaccurate service assessments.

WHY THIS IS IMPORTANT

DATS management makes extensive use of its data to make decisions. Accurate and complete data help make more informed decisions. A data quality assurance process can also help identify, prioritize, and correct potential problems.

RECOMMENDATION 7

Implement data validation controls and a data quality assurance process, to regularly review data accuracy and completeness to help make evidence-informed decisions.

Responsible Party

Branch Manager, Edmonton Transit Service

Accepted by Management

Management Response

Administration will document and implement data validation controls and a data quality assurance process.

Implementation Date

September 30, 2025

Improve Training

KEY FINDINGS

DATS operators (drivers) undergo extensive training that includes disability awareness training taught by someone with lived experience. Generally, the DATS staff we interviewed felt they had the training and tools to do their jobs. As well, DATS has training manuals and other training materials to help its staff learn their roles.

However, some DATS training manuals and materials are outdated. DATS also does not formally track training completion for registration agents, scheduling agents, and booking agents.

OUT OF DATE TRAINING MATERIALS

The booking manual, client relations manual, scheduling manual, and registration agent training materials are out of date.

DATS last updated the booking manual in 2015. Both the client relations and scheduling manuals provided instructions based on version 15 of the paratransit software. DATS currently uses version 21.

For schedulers, their role has changed recently, and their training manual includes some tasks that are not their responsibility (e.g., cash fare bag handling procedures).

For registration agents, we mentioned earlier in the report that the registration agents' documented training did not include the assessment guidelines to make eligibility decisions.

NOT TRACKING TRAINING COMPLETION

We also found that DATS does not formally track whether its registration agents, scheduling agents, and booking agents have completed their training.

DATS provides much of its training in person and on the job. These agents work closely with others and can ask questions or

get clarification as needed.

However, in-person and on-the-job training may not cover important topics required to perform the job, because trainees may not encounter them during the training period. DATS can prevent this risk by defining the required training topics, as it has with dispatchers and operators, and having staff track that they are all covered during training.

WHY THIS IS IMPORTANT

Up to date training makes it easier for new hires to learn how to do their jobs. Tracking training completion helps management know when a new hire is ready to perform the job independently.

RECOMMENDATION 8

Update training materials and formally track training completion to equip staff with the necessary skills and knowledge to provide excellent service.

Responsible Party

Branch Manager, Edmonton Transit Service

Accepted by Management

Management Response

Administration will document and implement a process to ensure training materials and Standard Operating Procedures (SOPs) are kept up-to-date. Administration will also document and implement a process to formally track training completion.

Implementation Date

December 31, 2025

ACKNOWLEDGEMENT

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