



Management Letter Regarding the Office of Unified Communications' 311 Operations Division

September 11, 2014

Audit Team:

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A Report by the Office of the District of Columbia Auditor
Lawrence Perry, Acting District of Columbia Auditor

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September 11, 2014

Ms. Jennifer A. J. Greene
Director
Office of Unified Communications
2720 Martin Luther King Jr. Avenue, SE
Washington, DC 20032

Dear Ms. Greene:

As you know, the Office of the District of Columbia Auditor (ODCA) initiated an audit of the 311 Operations Division of the Office of Unified Communications (OUC).¹ We have completed the survey phase of the audit and have concluded that the internal controls in place are sufficient and are being implemented effectively.² Due to this, we are writing to inform you that we are concluding the OUC audit at this time.

Our preliminary audit objective was to determine whether OUC managed the 311 Operations Division in an effective and efficient manner and complied with rules, regulations and law. During the survey phase, we reviewed relevant rules, regulations and law; conducted interviews with staff; analyzed data; observed program operations; conducted a risk assessment; and spoke with OUC partner agencies. Based upon our survey review and test results, we identified the following implemented internal controls, which were operating effectively.

- **Supervision:** We observed sufficient supervision of call-takers, including the review and approval of time sheets and overtime requests by a rotating group of supervisory staff.
- **Call Quality/Customer Service Monitoring:** We commend OUC's multi-layered approach to improving call quality that includes setting monitoring goals, integrating the call-taker in the review process and using the process for employee training.
- **External Communication:** We identified that there were adequate opportunities to exchange information with key partners, accomplished primarily through OUC's scheduling of monthly/quarterly coordination meetings.
- **Risk Assessment and Mitigation:** We determined that OUC had in place an emergency plan and tested it regularly.

¹ See letter from Yolanda Branche, District of Columbia Auditor, dated March 27, 2014. Our audit objective was focused on OUC's 311 Operations Division, not its 911 operations, which is a separate division. Thus, the focus of this letter is on the strengths of the 311 Division and opportunities for improvement, and cannot be associated with OUC's 911 operations.

² At the conclusion of the survey phase of an audit, there are cases where we are able to readily identify sufficient internal controls and conclude they are being implemented effectively.

- **Public Information Push - Best Practice:** We determined that OUC regularly uses 311 to push relevant information out to the public (i.e. school closings, trash collection schedule changes, etc.).
- **Providing Value-Added Services to Partner Agencies - Best Practice:** Our review revealed that OUC takes initiative to proactively inform agencies of weaknesses in their communications or operations based on OUC's analysis of call trends.

As with every operation, there are always opportunities to strengthen internal controls and integrate best practices. We have indicated those below.

1. **Creating, circulating and training of staff on standard operating procedures (SOPs).**

OUC had some written policies; however, OUC does not have comprehensive written SOPs for its 311 Operations Division that staff could refer to as central reference point for guidance and direction.

2. **Improving training and development.**

Staff interviews revealed that OUC may want to consider refresher training for staff on topics such as how to transfer calls to agencies and adhering to agencies' specific instructions on handling certain service requests.

3. **Maximizing the use of collected data.**

The approximate cost of a call to 311 is \$3.38. To get the most value out of this investment, OUC may want to provide additional value-added services to public and partner agencies, such as providing reports that analyze trends, response time by ward, etc. For example, OUC may consider:

- **Publishing average resolution days:** OUC provides service requesters an estimated time frame for resolution, but may want to also follow best practices and regularly publish the average number of days to resolve a request on their website. Including this data as well as the number of open and overdue requests, may give incentive to agencies to timely close out their open requests.
- **Work with agencies to ensure the accuracy of resolution days:** One agency reported that OUC used the incorrect number of days for a service request's resolution days. Also, as several agencies could not say when the resolution days were last reviewed for accuracy, we believe that it would be beneficial for agencies and OUC to re-evaluate the resolution days on a regular basis, such as annually, and base it on past performance provided by the agency.

As previously stated, during the survey phase of the audit, we conducted a risk assessment. During this assessment, we identified a level of risk surrounding partner agencies' open service

requests. Because the focus of our audit was OUC's operation of the 311 Division, it was out of our scope of review to assess how other District agencies carried out service requests generated through 311. Although the relationship between 311 and its partner agencies was outside of our planned audit's purview, we determined it necessary to share our general observations and suggestions. These suggestions could assist OUC and its partner agencies in increasing operational efficiency and effectiveness over 311 operations as it relates to open service requests.

As we understand the process, when a service request is submitted to OUC from a caller, through the website or the mobile app, it is added to OUC's Customer Service Request (CSR) data system. At least 12 different District agencies have access to CSR in which they can access the service requests that have been assigned to them, add status notes to the request, as well as, close out the request after it has been resolved. With the exception of a limited number of OUC managers, OUC staff cannot close out a service request; it is the responsibility of the agency to which the request was assigned. Further, CSR is set up to share the service request data with the various data systems that agencies use to manage their workloads, i.e. DDOT's Cityworks. Likewise, when staff at an agency close out a service request in their data system, CSR will automatically be updated to reflect those changes.

During our survey assessment, we reviewed OUC's "Sum of Open – Overdue" report that included the number of service requests that were opened in fiscal years (FY) 2011-2013, remained open as of September 30, 2013, and had exceeded the due dates set by agencies for how many days it should take for a service to be resolved and the request to be closed. For example, DDOT estimates that an alley repair service request should take 10 days to resolve, and OUC configures its service request database to identify any alley repair service requests that are still open after 10 days and label it as "overdue." We identified a high number of open and overdue service requests: FY 2011 (10,429); FY 2012 (11,078); FY 2013 (11,731); Total FY 2011-2013 (33,238). We also assessed a random sample of ten (10) FY 2013 service requests that were both open and overdue. While a small sample size, the results of our sample review echoed what we learned during interviews, document reviews and internal control review activities. Table 1 provides an overview of the service request types that had more than 100 open and overdue requests.

Table 1 – Overview of the Service Request Types with More than 100 Open and Overdue Requests*

Service Request Types	Responsible Agency	2011	2012	2013	Grand Total
Sidewalk Repair	District Dept. of Transportation (DDOT)	374	1,194	2,108	3,676
Rat Abatement	Dept. of Health (DOH)	824	1,134	1,493	3,451
Parking Meter Repair	DDOT	2,796	209	50	3,055
How's My Driving - Complaint	Office of Risk Management (ORM)	974	980	833	2,787

Parking Enforcement	Dept. of Public Works (DPW)	1,289	1,364	6	2,659
Bulk Collection	DPW	446	570	1,248	2,264
Alley Repair	DDOT	138	516	746	1,400
Out of State Parking Violation (ROSA)	DPW	103	100	953	1,156
CSR Reported Issues	OUC	230	688	136	1,054
DDS - Emergency Inpatient Hospitalization	Dept. of Disability Services (DDS)	352	306	313	971
Streetlight Repair Investigation	DDOT	184	52	667	903
Abandoned Vehicle - On Public Property	DPW	375	230	291	896
Street Repair	DDOT	50	123	572	745
Snow/Ice Removal	Contractors provided by Dept. of General Services (DGS)	726	4	-	730
Curb and Gutter Repair	DDOT	69	231	362	662
Street Cleaning	DPW	46	359	97	502
Sanitation Enforcement	DPW	248	250	3	501
Abandoned Vehicle - On Private Property	DPW	205	102	179	486
Alley Cleaning	DPW	57	278	74	409
Grass & Weeds Mowing	DPW	46	318	2	366
DDS - Abuse or Neglect Allegation	DDS	121	68	171	360
Insects	DOH	100	159	94	353
Residential Parking Permit Violation	DPW	146	100	-	246
Vacant Lot	DPW	71	167	4	242
Litter Can - Installation/Removal/Repair	DPW	23	158	46	227
Sign New Investigation	DDOT	41	52	133	226
Eviction	DPW	-	65	115	180
Pothole	DDOT	60	44	72	176
Illegal Dumping	DPW	1	151	4	156
Sign Replacement	DDOT	21	36	71	128
Recycling Collection - Missed	DPW	1	123	2	126
Trash Collection - Missed	DPW	-	117	-	117
Alley light Repair Investigation	DDOT	19	6	87	112
Litter Can - Collection	DPW	-	112	-	112
Tree Pruning	DDOT	17	29	62	108

Graffiti Removal	DPW	1	45	61	107
DDS -Incident Requiring Law Enforcement/Emergency Allegation	DDS	37	42	25	104
Utility Repair Investigation	DDOT	8	13	81	102

Source: OUC

* These numbers are subject to change based upon subsequent closure of requests.

There are justifiable reasons for open and overdue request tickets and some tickets are validly open and overdue (such as rat abatement requests that can take years to be completely resolved). However, the relationship between the 311 Division and the partner agencies is decentralized, which weakens accountability and communication regarding the requests in the tracking system. There are multiple potential risks posed with these high numbers of open tickets: (1) a lack of timely responses to customers; (2) a lack of accountability within agencies; and (3) a weakened reliability of OUC's data, which does not effectively aid in helping to determine where additional services are required, where specific services need improvement and which current services are effective. D.C. Code § 1-327.32 (b) requires that the calls to 311 be "monitored" and that the information collected from the calls "shall be used in determining where additional services are required, where specific services need improvement, and which current services are effective." D.C. Code § 1-327.32 (b) however, does not assign this task to a specific agency. Given the Code's lack of clarity regarding who is responsible for the monitoring of calls to 311, this ambiguity could be the ultimate reason for the large number of open tickets.

We are confident that the 311 Operations Division and its partner agencies want to meet the needs of the public as efficiently and effectively as possible. We would like to suggest an area where OUC can strengthen and integrate best practices into its current operations. Specifically, the relationship between OUC's 311 Division and its partner agencies in carrying out their mandate. Based on our understanding and observations, we are providing the following suggestions.

1. **Establishing written agreements on roles and responsibilities between OUC and key partner agencies.** As the D.C. Code does not assign the responsibility of monitoring to a specific agency, written agreements are needed to clarify roles and responsibilities of each agency to comply with D.C. Code. The agencies we interviewed reported that they were generally pleased with their 311 partnerships with OUC, yet raised some quality control issues that could be addressed in written agreements. For example, several partner agencies reported that 311 call takers periodically transfer calls to the agency without first informing the agency staff of the callers' needs. Written agreements could help clarify the expectations of both OUC and its partner agencies and could be updated/re-assessed on a regular basis. D.C. Code § 1-327.56 gives OUC the power to enter into MOUs as necessary.

Written agreements could also include a point of contact at the agency to which OUC could provide the monthly open and overdue reports. For example, in our sample, CSR provided no indication that the Office of Risk Management (ORM) had taken any action on two of the two open and overdue services requests. One of the requests was a reckless

driving complaint against an Office of Aging vehicle and the other was an aggressive driving complaint. If no action was taken on these requests, it poses significant risk to the District. We learned that CSR is not currently configured to notify a staff person at ORM of incoming service requests and that it is the responsibility of ORM to log-in to CSR on a regular basis. If OUC and ORM enter into an MOU, which identifies an ORM point of contact, OUC could configure CSR to ensure that this person is notified of all incoming requests.

2. **Developing a written process to ensure that requests are closed timely.** We determined that OUC did not have any formal or consistent processes for ensuring that requests are closed, such as sending monthly reports to all agencies that have open and overdue requests. We understand that only one agency has proactively requested such information, but we believe that by distributing reports to all agencies, OUC can help reduce the number of open and overdue requests.
3. **Working with the partner agencies to develop standard operating procedures (SOPs) for updating and closing requests.** The absence of clear procedures for how to close out service requests can lead to inconsistent practices and incomplete records within an agency, as well as, inconsistency between agencies. For example, in two of the three open and overdue service requests directed to DDOT, DDOT had not added any detailed notes on the status of these FY 2013 service requests. Similarly, in three of the three open and overdue service requests directed to DPW, DPW had not added any detailed notes on the status of the service requests.

There are multiple negative effects of an agency not providing detailed notes on its service requests: (1) the customer cannot find any updates when they go on-line or call 311 to check on the status of their request; (2) 311 staff may have to handle frustrated callers checking on the status of their request, which impacts overall call volume; and (3) the agency is burdened when 311 needs to forward the caller to the responsible agency/party to receive a status report. We determined that DOH's notes on the status of a service request were detailed and updated. We suggest that DOH share best practices for detailed notes with other agencies.

4. **Informing agencies how to disable automatic email.** When requests are closed, an email notification will be sent if the requester provided their email. This can pose a problem if an agency closes a long-overdue and open request. The requester may receive an email notification about a request they made several years ago, even if the agency had taken action in a timely manner but had not properly closed out the request. OUC's Data Manager stated that this function can be disabled, but some agency contacts were not aware of that.

ODCA is confident that the suggestions in this letter will be seen as valuable. We have not sent this letter to OUC's partner agencies, but we welcome you to share this information with them.

This letter will also be published on our website. If you would like to provide any written comments regarding our observations and suggestions, including if and when you plan to

implement any of the suggestions, please provide these written comments by August 28, 2014. Your comments will be incorporated, in full, with the posted letter.

Because the issue of the high number of open and overdue service request may negatively impact the effectiveness and efficiency of the District of Columbia's government operations, we may revisit this issue again within a year. If we then determine that the issue has not been resolved, we will consider initiating a specific audit of open and overdue service requests at that time.

Thank you again for your cooperation during this audit, and please extend our appreciation to your staff who responded diligently and timely to our requests during the survey phase. Please do not hesitate to contact me at 202-727-3600 should you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Lawrence I. Perry". The signature is fluid and cursive, with the first name "Lawrence" being more legible than the last name "Perry".

Lawrence I. Perry
Acting District of Columbia Auditor

Agency Comments



GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of Unified Communications

PUBLIC SAFETY
PUBLIC SERVICE

September 4, 2014

Mr. Lawrence Perry
Acting District of Columbia Auditor
Office of the District of Columbia Auditor
717 14th Street, NW
Suite 900
Washington, DC 20005

Dear Mr. Perry,

The Office of Unified Communications (OUC) has received the results of the 311 Audit. The audit revealed that the internal controls related to supervision, call quality, customer service monitoring, external communications and risk assessment and mitigation were operating effectively. Further, the audit provided documentation on strengthening internal controls, integration of best practices and developing risk management standards with partner agencies.

The audit findings support and parallel internal business process evaluations recently undertaken by the agency. Accordingly, OUC management's focus on the 311 Division is to strengthen internal controls and systematic measures, including the institution of standard operating procedures, provision of enhanced training and development opportunities and the improved utilization of collected data.

In FY13, the OUC revitalized its policy development staff, which is currently engaged in developing and codifying SOPs for each division of the agency. Methods of ensuring that these guiding documents are readily available to employees is through inclusion on the agency's secure intranet site as well as in the mandatory continuing education curriculum for all staff of the agency.

The OUC is formalizing its training program and the development of a core curriculum, under the management of the newly hired Training Coordinator. The Training Coordinator is responsible for assessing specific training needs, planning instruction and work related exercises for the employees; this will be done while systematically documenting an employee's progress.



GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of Unified Communications

PUBLIC SAFETY
PUBLIC SERVICE

Finally, the OUC has initiated an upgrade of the customer service request system to a cloud-based tracking system. The introduction of the new system will maximize the use of collected data and allow for better management of the data flow between the 311 Division and its stakeholders. And, in keeping with the standards of government transparency, the new system will feature access to enhanced dashboards and reports for customer service requests that produce highly detailed aging reports. The system will highlight areas of concern for the OUC, such as the adequate close out of all service requests.

Other ongoing efforts around strengthening internal controls include a comprehensive review of interagency MOUs, support of the analysis and modification of partner agency service level agreements and the wide publication of expected and average service request completion times. We anticipate that this will facilitate an enhanced level of resident engagement and help to establish realistic expectations and a clearer understanding about the entire service request process and the Office of Unified Communications' role in it.

Thank you for the opportunity to review the Audit of the 311 Operations Division report and provide a response on behalf of the Office of Unified Communications.

Sincerely,


Jennifer Greene
Director