METRO TRANSIT COMMENTS AND COMPLAINTS PROCESS AUDIT

PROGRAM EVALUATION AND AUDIT

METROPOLITAN
C O U N C I L

Contents

Customer Relations Ensure Consistency Through Policies and Job Aids, But A Formalized Approach and Enhanced Technology Could Improve Timeliness

What We Found

What's Working Well

Customer Relations (CR) staff have policies and job aids to reduce data errors and respond to customers. These documents assist staff in using an aging technology system. Staff are familiar and follow access control management procedures.

What Needs Improvement

Response times can be improved. Delays exist between customer contact dates and event processing completion, which can result in customer frustration, and attendant business & financial loss.

Access control management is not formalized, and procedures for granting and revoking access are undocumented. Access logs were unavailable.

Special events are manager-handled outside the CR application (CR App), which can lead to loss of data integrity, deletion or corruption.

What We Recommend

- Develop and implement a formal, standardized retention policy for all data types.

- Reinstate timeliness performance measures. The CR department should centrally manage and document all complaints, comments, and special incidents in the designated system of record.

- Document and formalize the process for granting and revoking access. Also, Implement and maintain a centralized logging and monitoring system
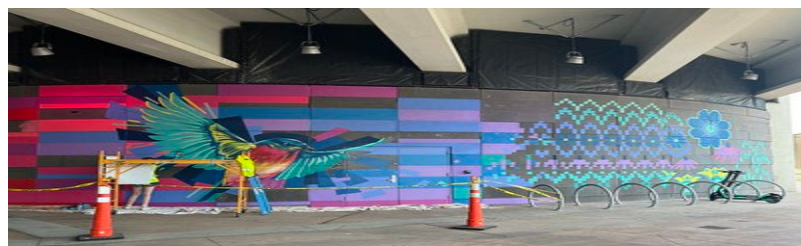
Why We Did This Work

As one of the first points of contact, an effective CR department is critical for maintaining positive public relations, reducing reputational risks, and identifying rider and system trends. Since 1998, CR has handled nearly 485,000 events.

What We Reviewed

Metro Transit's (MT) complaint process and supporting documents, including complaint logs from January 1, 2022, to December 31, 2023. We also reviewed the IT general controls around the CR App.

How We Did This Work

Audit interviewed CR management & staff. In addition, Auditors conducted a one-time process walkthrough to gain insight into processes.

Audit also reviewed current policies, procedures, and the CR Cheat Sheet. Auditors sampled both regular and special events and reviewed them against CR's procedures. Finally, Audit reviewed application access logs and retention schedules.

Summary of Findings

Number	Description	Recommendation	Follow-up Action	Page
Observation 1	Events Processing – Shift from Timely Performance Metrics to Customer Experience Hinders Performance Evaluation: 35% of Cases Exceeded Previous 7- Day Response Goal.	Reinstate timeliness performance measures to support the department's objective of overall customer experience and improving the timely resolution of complaints and comments.	Confirmation	*11*
Observation 2	Special Events Processing - Special incidents/events are processed, documented and resolved outside the CR App.	The CR department should centralize the processing, documentation, and resolution of all complaints and comments, including special incidents, by entering them into the current or any future designated system of record.	Confirmation	*12*
Observation 3	Access Control Management – Established and documented Access Control Process missing, with No Logs or Security Alerts in Place.	Establish and document the process for granting and revoking access to both current and future customer relations applications, including the procedure for assigning users to privilege groups that correspond to their required access levels.	Confirmation	*13*

		Implement and maintain a centralized logging and monitoring system for all current and future customer relations applications, designed to record all access events and generate automated alerts for failed login attempts and other anomalous activities.		
Observation 4	Retention Schedule - CR currently lacks a retention schedule and contains data from 1998	Create and implement a formal, standardized retention policy for all data types within the CR App, aligned with organizational and statutory requirements.	Confirmation	*15*

Introduction

Background

The Customer Relations (CR) department strives to improve business relationships with Metro Transit's (MT) customers, assisting in customer retention, and thus driving MT's growth.

The CR department is currently staffed at 10 employees, including the manager and supervisor. CR specialists tend to nearly 300 phone calls and 50 emails daily. The calls and emails address a wide variety of issues ranging from alleged hostile behavior, lost items, and non-transit related information requests. Inbound phone calls are handled by available specialists, while emails are distributed among staff for resolution.

CR uses a home-grown application, known as the Customer Relations Application (CR App), to record customer contacts. According to the Application Developer, the CR App was originally designed to compile information on customers and maintain points of contact between the customers and Metro Transit. Notably, issues that are handled by the CR management are tracked in a separate Excel document.

Intake of events occurs by a variety of methods, including by mail, email, phone call, social media, or in person. The CR staff member enters event details manually if communication was done by phone (text or voice call, or by electronic if communication was done by email. Using a combination of subjective assessment and the Cheat Sheet, the event is categorized within the application and provided with a unique identifier to make the report both easy to find and forward for further action.

Plans are underway to replace the CR app with newer technology via the Customer Issue Tracking & Reporting Solution. The vision is to streamline the reporting of customer and stakeholder interactions, thus enhancing transparency, coordination and the overall experience for customers and internal teams. As of the second week of May 2025, the project team is actively gathering requirements, planning the budget, and estimating costs in the "pre-procurement" phase.

Since its implementation on January 2, 1998, the CR App has tracked 484,558 events (**Table 1**).

Table 1- CR App Events Processed Since January 2nd, 1998

CR App Event Tracking (since 1998)	
Way of Reporting	**Number of Events**
Phone	239,272
Email	205,481
Mail	37,852
In Person	1,387
Social media	444
Teletypewriter Device	122
Total	484,558

Specifically for the years in scope, the CR department handled 13,691 customer contacts (calls, emails) in 2022, rising to a total of 16,002 contacts in 2023.

Except for specific Title VI and Americans with Disabilities Act (ADA) complaints, all public comments are directed to CR, processing complaints in accordance with Metro Transit's Operating Policy – Customer Feedback. Additionally, CR maintains an internal dashboard that categorizes complaints by type, date, and location.

The CR department is also involved in several aspects of MT's Safety and Security Action Plan.[1] Data from the CR App is used to update the quarterly progress reports and to measure progress on the plan's key goals. Specifically, the application is the data source for monitoring progress on decreasing customer complaints relating to public safety on transit. CR also reports customer feedback on litter, broken glass, and other debris at stops and in vehicles to the legislature. CR has an integral role in programs like the Customer Code of Conduct, Report a Problem, Adopt-A-Stop, and Supplemental Security amongst others.

Objectives

The objectives were to:

1. Evaluate whether MT's Customer Relations effectively follows the department's policies and procedures in handling complaints and comments.
2. Confirm the presence and effectiveness of IT General Controls by assessing user access controls, backup and recovery procedures and verifying compliance of the CR App with the current retention policy.
3. Verify that MT's Customer Relations has documented policies and procedures supporting the complaints management system.

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[1] Metro Transit (2025). *Safety and Security Action Plan.* Web. Link: *https://www.metrotransit.org/public-safety*

This audit considered the Metropolitan Council's *Thrive MSP 2040* Outcomes and Principles of Accountability by providing clear, easily accessible information.[2] It promotes equity by engaging the community in consensus and enabling other voices in decision-making processes. Furthermore, this audit contributes to advancing MT's divisional strategic plan by addressing the core element of "effectively communicating and engaging with our customers, stakeholders, and employees." [3]

Scope

The review covered MT's complaints process and its supporting documents, including complaint logs from January 1, 2022, to December 31, 2023.

Methodology

To evaluate CR's adherence to the department's policies and procedures, Audit conducted interviews with employees and performed a desk review of procedures, controls, and their associated documentation. Auditors also conducted an onsite where they shadowed CR's specialists to gain further understanding of their daily process. Additionally, Audit reviewed 72 regular comments and complaints to assess CR staff event processing times, along with 11 specially handled events that were resolved by the CR manager.

To evaluate Information Technology General Controls, Audit assessed access control management, data recoverability, and CR's compliance with retention policies. The team compared user accounts in the CR App against the current employee list to verify that only authorized, active staff had access to the application. Audit also interviewed staff from CR and Information Services (IS) to gather information on back-up procedures, the department's access-granting process and their retention policy.

Finally, to confirm that the department had documented policies and procedures, Audit reviewed the department's job aids. Auditors also reviewed CR's involvement in the development and reporting of Metro Transit's Safety & Security Action Plan. Audit reviewed relevant plan excerpts from Q2, Q3, and Q4 of 2023 and interviewed CR's management.

Recognition

Audit would like to extend thanks to CR's management and staff for the time taken to guide Audit through the one-time walkthrough, and for responding promptly to questions and document requests.

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[2] This audit began under *Thrive MSP 2040.* The Council has a new long-term plan, *Imagine 2050*. Accountability and Equity continue to be core values for the Council in *Imagine 2050*.

[3] This audit began under Metro Transit's 2023 strategic plan: *Stronger, Better*. Metro Transit has a new strategic plan, *Forward*, in which Experience is a strategic priority. Implementing the customer issues reporting and tracking project is one of the initiatives that will improve the customer experience.

Non-Finding Observation

Customer Relations Relies on Multiple Informal Tools Without Standardized Guidance, Highlighting Need for Documented Procedures.

During Audit's process walkthrough, we observed that CR staff use at least five different tools to process events in their daily operations. One of these tools, the "Cheat Sheet," is an internally developed handbook that aligns with various categories in the CR App. CR staff use the "Cheat Sheet," along with policies and job aids, to minimize data errors and respond effectively to customers. However, CR does not require or standardize the use of the Cheat Sheet. Staff have no defined criteria for using it successfully, and CR informs new staff of its existence without providing formal training. As a result, staff typically develop proficiency with the tool through on-the-job experience.

This informal approach conflicts with Principle 12.03 of the *Standards for Internal Control in the Federal Government* (GAO-14-704G), more commonly known as the *Green Book.*[4] It directs management to document operational objectives, related risks, and the design and effectiveness of controls through formal policies. It also requires each unit to maintain documentation in sufficient detail to monitor control activities effectively.

Formal guidance for using key tools like the Cheat Sheet and clearly documenting and communicate related policies could strengthen internal controls and improve performance consistency.

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[4] United States Government Accountability Office (September 2014). *Standards for Internal Control in the Federal Government (Green Book)*. Web. Link: *https://www.gao.gov/assets/gao-14-704g.pdf*

Shift from Timely Performance Metrics to Customer Experience Hinders Performance Evaluation: 35% of Cases Exceeded Previous 7-Day Response Goal

Testing of a statistically representative sample of 72 CR App events showed 26 events (36%) took up to 3 days to process, 13 events (18%) took up to 5 days, while 26 events (36%) required up to and beyond 7 days to process (**Table 2**). Additionally, processing time for 7 of 72 events (10%) could not be determined during initial review. According to CR management, all outstanding items should have been closed out.

CR management provided 117 specially handled events (57 items in 2022 and 60 events in 2023), maintained in Excel spreadsheets, for audit testing. A statistically representative sample of 11 special events (10%) showed 4 (36%) took up 3 days to resolve, 2 (18%) took up to 5 days, while 3 (27%) required longer than 7 days to resolve. Meanwhile, processing time for 2 events (18%) could not be determined.

Table 2 – Event Processing Time

Complaint Type	Up to 3 Days	Up to 5 Days	Up to and Beyond 7 Days	Undetermined
Regular	26	13	26	7
Special	4	2	3	2
Total	30 (36%)	15 (18%)	29 (35%)	9 (11%)

The *Green Book's* Principle 6.02 directs management to define objectives in specific and measurable terms to allow for the assessment of performance toward achieving objectives. Additionally, Principle 10.03 requires management to (i) track major entity achievements and to compare these to the plans, goals, and objectives set; (ii) compare actual performance to planned or expected results and analyze significant differences; and (iii) establish activities to monitor performance measures and indicators.[5]

In the 2019 Fact Sheet, MT's stated Agency Goal for CR timeliness was to respond to 90% of customers within 3 days, 95% within 5 days, and 100% within 7 days. The actual 2019 numbers were - 83% within 3 days, 90% in 5 days, and 94% in 7 days. In 2023, the Fact Sheet omitted any

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[5] United States Government Accountability Office (September 2014). *Standards for Internal Control in the Federal Government (Green Book)*. Web. Link: *https://www.gao.gov/assets/gao-14-704g.pdf*

reference to these timeliness measures. Interviews with stakeholders and CR leadership described a direct pivot toward improving overall customer experience.

Delays in complaint processing and resolution pose a reputational risk to Metro Transit. Unsatisfied customers may choose alternative transportation if their concerns are not addressed promptly and thoroughly.

Recommendation:

(1) Reinstate timeliness performance measures to support the department's objective of overall customer experience and improving the timely resolution of complaints and comments.

> **Management Response:** Customer Relations agrees to formulate new performance measures with the introduction of the new CRM in late 2026. The new system will have the functionality to remind and report on cases and associated metrics to help ensure timelines are being met. However, in the meantime, we will work with internal stakeholders to remind them that if your case requires a call back to the customer it must be done within the (3) days from when the case was created by Customer Relations. Further, cases that don't require contacting the customer should be reviewed and if possible, closed out within (7) days. Customer Relations will work with IS to create or modify a report that could be used to assist the Customer Relations Manager/Supervisor in following up and tracking how existing measures are being met.

> **Timetable:** New CRM late 2026. Existing CRM Q4 2025.

> **Staff Responsible:** Systems CR Manager/Supervisor and Transit Information Data & Business

> **Audit Follow-Up:** States what follow-up action Audit will perform.

Special incidents and events are processed, documented, and resolved outside the CR App.

Almost the entire population of 484,558 complaints and comments are contained within the CR App. However, special incidents and events handled by the CR manager are documented in separate Excel spreadsheets that are updated annually. A few examples of these special events include service requests from senior Metropolitan Council staff, legislative representatives, and emailed messages from the public deemed sufficiently troubling enough to warrant law enforcement involvement. In 2022 and 2023, 117 special events were tracked separately.

A system of record (SOR) is an information storage and retrieval system that stores valuable data on an organizational system or process. This record can contain multiple data sources and exist

at a single location or multiple locations with remote access. However, to ensure data integrity and validity, there must be only one SOR for a given piece of information.[6] It maintains important data which allows for the operation of one or more key business processes.

According to the application developer, the CR App is MT's designated SOR for complaints and comments. A significant number of employees within the CR unit interact with the application regularly during their work, including using the data storage and information output from the system for important decision-making processes.

The primary function of the CR App is maintaining organization for the data it stores. The CR App ensures that all relevant information stays in one location. Keeping an SOR organized makes it easier for staff to identify and access key data quickly. Additionally, it is important to know what regulations affect businesses when operating within local, state, and federal oversight.[7]

Recommendation:

(2) The CR department should centralize the processing, documentation, and resolution of all complaints and comments, including special incidents, by entering them into the current or any future designated system of record.

Management Response: Customer Relations agrees and at the onset of the audit in 2024 the special incidents & events were being logged in to the CR App.

Timetable: Complete

Staff Responsible: Customer Relations Manager/Supervisor

Audit Follow-Up: States what follow-up action Audit will perform.

Established and documented access control processes are missing, with no logs or security alerts in place.

The CR App does not employ role-based access control. Instead, access is granted through Ivanti by modeling it after an existing user with similar requirements. An engineer assigns the user to a group that mirrors the privileges of the reference user and finalizes the setup in coordination with the application owner. These groups hold varying levels of access and functionality: most users can manage follow-ups and generate reports, while select groups are granted access to advanced features and specialized capabilities. Access revocation is handled

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[6] Zola, Andrew (2022). "What is a System of Record (SOR)?". Tech Target. Web. https://www.techtarget.com/whatis/definition/system-of-record-SOR

[7] Indeed.com Editorial Team (March 2025). "System of Record: What They Are, Common Types and Benefits." Web. Link: https://www.indeed.com/career-advice/career-development/system-of-record

by updating the user's status in the Security application or database to "Revoked," effectively removing their access.

However, according to stakeholders the procedures for assigning access control are informal and undocumented. Additionally, there are no logs or alerts for security events.

In the CR App, five individuals with active system access are no longer Council employees. One of these accounts, labeled as a test profile under the name "D. Maki," was linked via an Outlook search to an external email address.

Center for Internet Security (CIS) standard 5.1 requires the establishment and maintenance of an inventory of accounts, with recurring, quarterly validation to ensure all active accounts are authorized. CIS Control 6.1 requires the organization to establish and follow a process, preferably automated, for granting access to enterprise assets upon new hire, rights grant, or role change of a user and 6.2 requires the organization to do the same for revoking access. Finally, CIS Control 8 requires a documented audit log management process, including log collection, review, and retention for at least 90 days. The documentation must be reviewed annually or after significant organizational changes.[8]

The absence of a formalized access control management process has likely allowed the issues in the CR App user access list to persist. Specifically, the presence of inactive employees and a test account linked to an external email address. Without regular access reviews and proper controls to prevent test profiles from existing in production environments, these deficiencies remain unaddressed. The lack of security event logging further compounds these risks, leaving the organization unable to detect or respond to unauthorized access in a timely manner.

Recommendations:

(3) Establish and document the process for granting and revoking access to both current and future CR App, including the procedure for assigning users to privilege groups that correspond to their required access levels.

Management Response: We will establish and document permissions framework to define how access levels are assigned and granted prior to implementing the RBAC structure in our new CRM solution.

Timetable: Q4 2026

Staff Responsible: Transit Information Data & Business Systems

Audit Follow-Up: States what follow-up action Audit will perform.

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[8] Center for Internet Security (May 2021). *CIS Critical Security Controls*, Version 8. Web. Link: *https://www.cisecurity.org/controls/v8*

(4) Implement and maintain a centralized logging and monitoring system for all current and future CR App, designed to record all access events and generate automated alerts for failed login attempts and other anomalous activities.

Management Response: We will be implementing a modern RBAC structure in our new CRM solution that will have audit logging for authentication and authorization, ensuring audit trails for compliance and security reviews.

Timetable: Q4 2026

Staff Responsible: Transit Information Data & Business Systems

Audit Follow-Up: States what follow-up action Audit will perform.

CR currently lacks a retention schedule and contains data from 1998.

Since the system's creation on January 2, 1998, CR has processed a total of 484,558 events. We traced data in the CR App as far back as January 1, 1998. However, there is not a formal retention policy for this content, leading to inconsistent data retention practices and outdated or improperly managed records. Additionally, the current practice is not compliant with the Council's established policies or state statutes.

The Council's current records retention policies are designed to ensure records are managed in an organized, professional manner while minimizing the costs of inactive record storage and complying with Minnesota state statutes. According to Minnesota Statutes 138.17, subd. 7, public officials shall prepare a complete inventory of records in their custody and attach a schedule—approved by the head of their agency—specifying the retention or disposal period for each record series.[9] Additionally, the Council's Document Management Policy, RF 8-2, emphasizes the use of electronic records as the legal copy, unless otherwise specified by statute.[10] Given these requirements, the records stored in the CR App must have a retention schedule tailored to the specific types of data housed in the system.

According to the Council's Enterprise Content Management (ECM), data retention is primarily driven by content, such as complaints and feedback, with the retention period varying depending on historical value and business needs. For instance, significant complaints that lead to policy changes are retained longer than one-off complaints. The current CR App, developed by the Council's IS, includes various types of data such as customer feedback, event descriptions, customer contact details, responses, and possible disciplinary actions.

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[9] Minnesota Statutes. "Government Records; Administration." Web. Link: *https://www.revisor.mn.gov/statutes/cite/138.17*
[10] RF 8-2. Document Management Policy. Internal Policy.

Recommendation:

(5) Create and implement a formal, standardized retention policy for all data types within the CR App, aligned with organizational and statutory requirements.

Management Response: The current CR App does not have a data retention schedule or the capabilities to adequately differentiate the different types of content stored in the application. ECM will confirm with Manager/Supervisor Customer Relations that all records currently stored in the CR App are listed on the Council record retention schedules and add any additional records to the Council record retention schedules for approval by the Minnesota Records Dispositional Panel. Once the new customer relations application is procured, ECM will discuss implementing retention features in the application and work with IS staff to implement record and data retention in the application. The ability to have retention features in the application has already been added as a consideration in the requirements gathering process and is part of the IS general requirements for contract agreement.

Timetable: Q4 2026

Staff Responsible: Enterprise Content Management (ECM), Manager/Supervisor, Customer Relations and Transit Information Data & Business Systems.

Audit Follow-Up: States what follow-up action Audit will perform.

Conclusions

The CR team plays a critical role at MT. They serve as one of the first points of contact for riders - helping them resolve issues, locate routes, recover lost items, and report events related to Title VI and ADA to the Office of Equity & Equal Opportunity. The department also provides key information to other Council stakeholders to help them respond to changing conditions on the system.

The department has several tools that it has developed over the years to respond to riders' needs. However, the CR App should be updated with modern, secure technology that will allow for more effective reporting and case management. Doing so will further *Metro Transit Forward's* strategic priorities to improve the use and availability of transit information data and tools.

June 5, 2025
Matthew J. LaTour, Chief Audit Executive
Program Evaluation & Audit

Appendix A

Program Evaluation and Audit recommendations are categorized according to how Audit will follow-up on them. The categories are:

- **Retest** — Audit will retest the area using the same or similar procedures after a recommendation has been implemented and sufficient time has passed for the changes to take effect. The retest will take place on a specified timetable. The recommendation will be closed once the change has occurred. A new audit project will be opened for retesting and any new findings will include new recommendations
- **Confirmation** — Audit will confirm that an adequate risk response has been completed on the agreed upon timeline. The recommendation will be closed once the change has taken place.
- **Assess Risk** — Audit will not plan for specific follow up to these recommendations. Audit will discuss the area as part of its annual risk assessment activities and consider future audit work in the area.

Appendix B: Distribution List

All audit reports are reported to the general public and are available on *www.metrocouncil.org*. This audit report was distributed to the following parties:

- Members of the Audit Committee
- Regional Administrator
- General Manager, Metro Transit
- Assistant General Manager, Metro Transit
- Chief, Metro Transit Police Department
- Director, Office of Equity and Equal Opportunity
- Assistant Director, Office of Equity and Equal Opportunity
- Director, Metro Transit Community Affairs
- Director, Applications, IS Administration
- Manager, Metro Transit Customer Relations