

ORANGE COUNTY TRANSPORTATION AUTHORITY INTERNAL AUDIT DEPARTMENT



Travel Training Services Provided by Mobility Management Partners

Internal Audit Report No. 26-514

August 10, 2026



Performed by: Jonathan Thompson, Internal Auditor *Jonathan Thompson*
Janet Sutter, CIA, Executive Director

Distributed to: Johnny Dunning, Chief Operating Officer,
Kim Tucker, Jack Garate, Denise Capistran

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Conclusion

The Internal Audit Department of the Orange County Transportation Authority (OCTA) completed an audit of travel training services provided by Mobility Management Partners (MMP). Based on the audit, MMP generally complies with contract terms, and invoices are properly approved; however, one recommendation was made to strengthen controls to ensure original workshop sign-in sheets are retained and program requirements for distribution of free bus passes are improved and enforced.

Background

The Mobility Management Program (Program) was launched in 2017 to help people understand how to navigate and use the OC Bus system independently. The Program offers travel training for OC ACCESS riders, seniors, individuals with disabilities, college students, new riders, and those with limited English skills. The Program aims to promote independence, expand access to public transit, boost ridership, and reduce reliance on OC ACCESS paratransit.

On May 23, 2022, OCTA entered into Agreement No. C-2-2187 (agreement) with MMP to provide travel training services for an initial three-year term from August 1, 2022, through July 31, 2025, at a firm-fixed price of \$1,116,804. OCTA exercised a two-year option term to extend services through July 31, 2027, for a total cost of \$1,895,188.

The role of MMP includes designing a curriculum specific to OCTA consumer needs, conducting outreach efforts to identify community organizations to host workshops, preparing workshop materials to educate attendees about OC Bus routes, schedules, and accessibility features, and providing field training on board the OC Bus system. MMP conducts workshops in English, Spanish, Vietnamese, Korean, Mandarin, and other languages, as needed. MMP also conducts individual follow-ups with attendees at one, three, and six-month intervals.

Group Transit Training Workshop participants receive two, one-day bus passes with completion of a survey and Individual Transit Training participants receive a 30-day bus pass with completion of a survey.

The Specialized Transit Services section, within the Transit Division, is responsible for contract oversight. Invoices are sent monthly and include an Executive Report indicating the number of transit training courses conducted during the month and year-to-date, the number of workshop participants, the number of referrals received and/or individuals contacted, etc. The Executive Report is supported by other detailed information, including the names of the participants and workshop dates and locations.

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Objectives, Scope, and Methodology

The objectives were to assess and test oversight, invoice review, and contract compliance related to the agreement with MMP.

The methodology included testing executive reports to determine whether task objectives were achieved in accordance with the agreement. Invoices were tested to verify proper approval, accuracy, and compliance with contract terms. Invoice-supporting documentation, including participant agreements and workshop sign-in sheets, was also tested to validate the accuracy of reported data. Testing of workshop attendance records was also conducted to identify whether participants attended multiple sessions and whether participants were required to complete a survey in order to receive free bus passes, as indicated in Program materials.

The scope was limited to the agreement with MMP during the initial contract term for determining whether task objectives were met. Testing of invoices and supporting documentation was limited to the period from August 1, 2025, through March 31, 2026.

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.

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Audit Comment, Recommendation, and Management Response

Workshop Sign-in Sheets and Bus Pass Distribution

Original sign-in sheets for workshops conducted were not always retained and participants are not always required to complete an evaluation survey to receive free bus passes, as required by Program rules. Testing also identified several instances whereby the same participant attended two or three workshops at the same location and received free bus passes at each session.

Recommendation 1:

Management should ensure that MMP maintains original supporting documentation for all activities. Additionally, workshop participants should be required to complete an evaluation survey as a prerequisite for receiving free bus passes, as required by Program rules. Management should also consider implementing controls to limit the issuance of free bus passes to individuals attending multiple workshops.

Management Response:

Management agrees with the recommendation.

In June 2026, MMP updated its record retention practices to ensure original workshop sign-in sheets and supporting documentation are retained for all activities. Staff will continue to monitor compliance with this requirement.

During management's review, it was determined that MMP had been operating under prior Program practice that allowed bus passes to be distributed without completion of an evaluation survey. Effective with the workshops conducted in June 2026, participants are required to complete an evaluation survey before receiving a promotional bus pass. Staff will continue to monitor compliance with this requirement.

To address the recommendation regarding the distribution of promotional bus passes to participants attending multiple workshops, staff will revise Program procedures to limit participants to two single-day promotional bus passes within a six-month period. Staff will monitor workshop attendance and bus pass distribution records to ensure compliance with the revised Program requirement.