

**Los Angeles County
Metropolitan Transportation Authority
Office of the Inspector General**

**Review of Translation Services
for Metro Transit Customers**

Report No. 17-OTH-01

June 2, 2017



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Metro

Los Angeles County
Metropolitan Transportation Authority

Office of the Inspector General
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DATE: June 2, 2017

TO: Board of Directors
Chief Executive Officer

FROM: Yvonne Zheng, Senior Manager, Audit 
Office of the Inspector General

SUBJECT: Review of Translation Services for Metro Transit Customers
Report No. 17-OTH-01

INTRODUCTION AND EXECUTIVE SUMMARY

As part of our continuing effort to assist Metro to improve transit customer service, the Office of the Inspector General (OIG) reviewed a possible option to expand Metro's translation services to transit customers who do not speak English.

The Federal Transit Administration (FTA) requires that grantees ensure meaningful access to Limited English Proficiency (LEP) persons. The Chief of Civil Rights Programs informed us that Metro has complied with FTA policy and has established a program for LEP persons to obtain information. However, Metro's system does not provide bus operators or other Metro staff who regularly interface with patrons a method to directly communicate with LEP patrons. Our review found that a transit agency, Nashua Transit System (NTS), has successfully utilized Google Translate (a free App¹) to aid bus operators to communicate with LEP persons and provide them information, such as directions or instructions for navigating their transit system. Operators and customer service agents are on the forefront of interfacing with transit patrons. Therefore, we suggested that Metro conduct a further study of the costs, operational impacts, union agreements, and technology issues related to how Metro can improve its patron's transit experience by implementing a translation system which Metro can facilitate providing information to LEP persons as Wi-Fi connectivity is accomplished on Metro bus and rail vehicles in the near future. Management responded that they intend to pursue alternatives to the method that Nashua Transit System utilized. Metro's response is shown in Attachment A.

¹ A self-contained specialized program or piece of software designed to fulfill a particular purpose that is downloaded onto mobile devices.

BACKGROUND

A. FTA Circular

Pursuant to the Civil Rights Act of 1964 and as a recipient of federal funds from the Federal Transit Administration (FTA), Metro has an obligation to provide services to Limited English Proficiency (LEP) patrons.

On December 14, 2005, the United States Department of Transportation (USDOT) published revised guidance on LEP for federal fund grantees.² FTA Circular 4702.1B³ states that grantees shall document the steps undertaken to implement the USDOT LEP Guidance necessary to provide “meaningful access” on the basis of four factors:

- (1) the number and proportion of LEP persons served or encountered in the eligible service population,
- (2) the frequency with which LEP individuals come into contact with the program,
- (3) the nature and importance to people’s lives of the program, activity, or service provided,
- (4) the resources available to the recipient for LEP outreach and the associated costs.

Grantees are required to ensure meaningful access to LEP persons. A means to ensure meaningful access is to develop and carry out a Language Assistance Plan (LAP). Grantees have considerable flexibility in developing a plan.

B. Google Translate

Google Translate is a free software application (“App”) available for Android, IOS, and Windows operating systems. The App can translate 103 languages from text entry (see Attachment B). In conversation mode, the App can translate two-way speech in 32 languages with an on-line internet connection. In addition, there are smaller offline translation files available in 52 languages. Google Translate also is capable of storing frequently used phrases in any supported language.

Other applications may also exist or become available in the near future. Since Google Translate is currently available for use free of charge, our study focused on some features of this App.

OBJECTIVE

The objective of this review is to explore opportunities for Metro to improve customer transit experience by expanding its translation services to transit customers who do not speak English.

² Federal Register, Vol. 70, no. 239, pp. 74087–74100, December 14, 2005

³ FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, dated October 1, 2012

SCOPE AND METHODOLOGY OF REVIEW

To achieve the review objective, we:

- Reviewed FTA requirements to ensure meaningful access to LEP persons
- Contacted an official in the FTA Los Angeles office
- Researched information on the Internet concerning the use of the Google Translate App
- Contacted the General Manager of the Nashua Transit System to discuss their implementation of the Google Translate App
- Interviewed Metro’s Chief of Civil Rights Programs
- Interviewed staff in both Customer Service and Operations

RESULTS OF REVIEW

A. Nashua Transit System, New Hampshire

We found that the Nashua Transit System (NTS) has installed Google Translate onto tablets already mounted on buses to provide translation for customers who do not speak English.⁴ NTS contracts with First Transit to operate 10 fixed bus routes. From a discussion with the NTS General Manager, we found that:

- The Google Translate App is very easy to install and use, and can be downloaded to any tablet or smart phone. NTS already had tablets mounted on all of its buses for the RouteMatch software, so there was no additional investment needed to purchase mobile devices or an internet connection (which would not be the case at Metro).
- To use this App, the operator hits the home button on the tablet and then clicks on the Google Translate App. It is simple to use, and when done with the App, the operator returns to the home screen and re-opens RouteMatch without having to log in. Training for the operator takes less than 10 minutes.

NTS has a policy in place to prohibit the use of the App by the operator when the bus is in motion, which is similar to those policies regarding the use of cell phones and other electronic devices. Since the Google Translate App does not have a feature to prevent the operator from using it while the vehicle is in motion, NTS provides operators training on when the App can be used. NTS informed us that the operators generally liked the App. Our review found that NTS are normally communicating only with English or Spanish-speaking patrons, while Metro’s LEP customers may need support for more languages. The Google Translate App currently has this capability.

⁴ On July 4, 2016, New Hampshire Public Radio published an article titled “Nashua Buses Find New Way to Avoiding Getting Lost – in Translation.” <http://nhpr.org/post/nashua-buses-find-new-way-avoid-getting-lost-translation>

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- Passengers and operators who have used the translation App have found it to be a “huge” help and it has eliminated the language barrier.
- Google Translate can be used with either verbal or text input. (Note: Metro policies and California law limits Operators use of devices while driving except under certain circumstances; that would have to be complied with. Possibly passengers could use the device while in motion, which would have to be determined.) The built-in microphone can pick up voices without having to be too close to the tablet. Below is a picture of an operator using the App to communicate with a passenger:



B. Limited English Proficiency (LEP) Languages

There are approximately 120 languages spoken in Los Angeles County. The Metro Chief of Civil Rights Programs stated that Metro performed the analysis required by the FTA and determined that Metro needs to provide translation services for LEP in nine languages⁵ based on the prevalence of these languages spoken in the Los Angeles County transit population.

C. Metro Customer Service Information

Metro’s public website (metro.net) provides a general customer service telephone number (323-466-3876) where transit customers can obtain information concerning Metro and its transit system. Information is provided in English and nine other languages. Metro’s customer service telephone number is operational 7 days a week.⁶

Metro’s customer service employees answer questions for patrons who speak English or Spanish. Callers wanting assistance in other languages must advise the Metro customer service agent the

⁵ Armenian, Chinese, Japanese, Khmer (Cambodian), Korean, Russian, Spanish, Thai, and Vietnamese.

⁶ 6:30 a.m. – 7:00 p.m. Monday to Friday and 8:00 a.m. – 4:30 p.m. Saturday and Sunday.

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language they speak. If it is one of the nine languages for which Metro provides LEP services, the customer service agent contacts a contract translation firm (currently Lionbridge). The contractor charges ninety-nine cents (\$0.99) a minute. During FY 2016, Metro paid a modest amount for this service.

When a customer calls this telephone number, a recording states: Thank you for calling Metro:

- To continue in English, press or say 1
- For assistance in Spanish, press or say 2 (spoken in Spanish)
- For assistance in any other language, press or say 3

As a test, an OIG staff member called the Metro customer service information number and pressed “3.” An English speaking customer service agent answered and asked the caller for a starting point. The OIG caller responded “Chinese.” The agent replied “hold on.” After approximately 4 minutes, a translator joined the call with the Metro Customer Service agent, and the OIG caller asked “how can I obtain a college TAP card” (in Chinese). The translator placed the caller on hold, and after approximately 5 minutes she provided the requested information. The translator and the Customer Service agent were both on the phone, which is a real-time translation service. It was excellent that Metro could arrange for an interpreter relatively promptly and answer the question in 9 minutes. However, the question might have been answered in less time if the Google Translate software was used. In addition to the general customer service telephone number on the Metro website, bus operators provide a card that shows this telephone number and the nine languages for which LEP services are provided; to non-English speaking patrons who ask questions in a foreign language (see Attachment C).

If a tablet with Internet access was on board, the patron could be directed to obtain the information more quickly that way, and without using the Customer Service staff or interpreter. It is also possible this system could be used in kiosks in rail stations, but this would also require more study.

D. Metro Operations Department

We also discussed the use of Google Translate with the Operations Department. We were told that Operations would be interested in a pilot program for this service but would need to further study this App, including cost since Metro has a fleet of over 2,000 buses. We were told that if Metro migrates to an audio-visual annunciator system for displaying information on their buses such as routes, time points and navigation information on its vehicles, this application would be beneficial to add to the equipment considering that it could be useful for LEP customers. Furthermore, Metro is in the process of a pilot program to have signage on an operator’s uniform or nearby to indicate if that operator also spoke a language other than English.

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E. Office of Civil Rights

The Metro Chief of Civil Rights Programs told us that he was aware of the media article regarding use of the Google Translate App by the Nashua Transit System, and was interested in looking into it.

F. Customer Service Department

We asked Metro's Customer Service Department about using the Google Translate App. They had not previously been aware of its existence and so read the article concerning NTS. Upon consideration, the Customer Service said that they do not want this system because they are satisfied with the translation service. They stated that Lionbridge not only provides translation in the nine languages required, but also have translation services available in up to 200 languages. Customer Service also said they do not want their computers and telephones hooked up together for the concerns of complexity and security. Installation of the Google Translate App would necessitate connectivity between their computer and telephone so that the calling customer can connect with the customer service representative and the translation application on a computer. An LEP customer would speak to the customer service representative, who can initiate the translation application, review the response, type or dictate a proper response to the customer's questions back to the translation application who then replies directly to the customer in their preferred language.

This response does not appear to consider the improved performance that might be attained by providing a reply in much less than 9 minutes while paying \$0.99 per minute versus via the App. This reply might also not consider the option of having a caller select the App directly and speak directly to the App if they choose without customer service operations involvement, for a database of Frequently Asked Questions. Also, use could be tested at customer service windows, which is more like the bus situation but less problematic (not in same rush mode, not a distraction to operator, not a computer hook up to a phone, etc.).

G. Other Considerations

We understand that installing tablets for translation services is a new way of using technology at Metro. Devices such as touch screen tablets or information kiosks could be installed at appropriate locations throughout the system, which may provide advertising revenue.

We also considered that the making of any investment in this technology might be questioned as necessary in that many people are increasingly carrying smart phones. On this, we believe that many people who have smart phones will still not be adroit enough with language interpretation software that they will be proficient enough to use this effectively to accomplish speedy translation for enough years ahead, that consideration of this investment now by Metro is still a viable alternative to further study the concept and implementation process.

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CONCLUSION

Our review found that the Google Translate App and Metro's customer service information line are not duplicative for the most part and may complement each other if used jointly. Both methods provide translation services but do it differently. The cost of personal translation services method that Metro currently uses is low, but it is an ongoing expense per call. The Google Translate or other App we suggested involves an upfront cost of device purchase and maintenance or replacement over time.

Even though many people now have smart phones, a device at a kiosk in Metro facilities has the benefit of usage beyond language translation. It could be used for any transportation information or trip planning question.

- Metro's current system is better suited for customers wanting information about Metro services, such as how to purchase fare media, Metro programs, trip planning, or other information concerning the agency. It takes 5 to 10 minutes using Metro's system where
 - a customer service agent connects an interpreter;
 - an interpreter speaks with the patron to determine the patron's question;
 - an interpreter speaks with a Metro employee to obtain the answer to the question;
 - an interpreter informs the patron of the answer to his/her question.
- The Google Translate App is better suited for quick real time communication between an operator or other Metro employee and an LEP person who needs immediate information concerning directions, bus route, stops or destinations. It is possible a system could query a database in the patron's language directly and provide answers for some items without involving a Metro staff member. The Google Translate App is free, but needs to be downloaded onto a tablet or other electronic device and needs an Internet connection. Translated responses to customer questions are relatively fast; and perhaps a system could be placed to let the customer interface directly with the system. Currently, the bus operator is the one who attempts to answer the patron's question and can only do so up to the extent of knowledge they have. They probably do not know 9 languages and every detail of every bus route in the system. (See Attachment D for comparison of the two translation systems.) It also poses a distraction to the operator that can contribute to safety risks.
- Metro buses are not currently equipped with tablets or smart phones and do not have internet connections. If Metro desires to use Google Translate, it will need to purchase tablets or other electronic devices and purchase an Internet connection from a provider. The audio-visual annunciator information system mentioned above might also be able to use this system. Purchasing a tablet for each bus may require an initial capital investment of up to \$500,000 (assuming a \$250 initial investment per device). The NTS spent about \$400 purchasing tablets directly from a national cell phone carrier. Based on what the Nashua Transit System told us, training would be a minimal cost.

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Based on the above preliminary study, we found that Metro could improve the customers' transit experience by testing translation system to communicate with LEP persons. Due to the fact that Metro is considering adding an information system to their buses along with Wi-Fi; and Google Translate could possibly be added without additional cost. It is also possible that further improvements in software may be available in the future and should be considered as they occur.

SUGGESTION

We suggest that the Civil Rights Programs Department consider working with Metro's IT Department, Operations Department, Communications Department, and other departments that interface daily with the public to:

- a. explore the feasibility of using Google Translate or other programs to provide immediate translation service to transit operators, customer service representatives, and other staff who interface daily with transit customers, and/or
- b. integrate Google Translate or similar program with devices as Metro acquires more Wi-Fi, smart phone devices, or other capabilities in the future.

MANAGEMENT COMMENTS

On May 17, 2017, the Office of Civil Rights, in coordination with Operations, Communications, and Information and Technology Services responded to the suggestions in this report (see Attachment A). Metro's response provided alternative actions to improve and expand services to LEP patrons such as:

- Offering bus operators the opportunity to self-identify if they speak a foreign language.
- Embarking on a major training effort over the next 18 months to ensure that all employees are familiar with the requirements for serving LEP populations.
- Making all employees aware of the resources that Metro has available including web and voice, pictograms, and multi-lingual publications.
- Installing communications equipment that will provide free WiFi services to its transit bus riders. This functionality will allow the rider to obtain translation services via mobile or connect directly to a customer agent that can address their concerns in real time through a web chat session.

Copy of Management Comments


Metro

Interoffice Memo

| | |
|---------|---|
| Date | May 10, 2017 |
| To | Yvonne Zheng |
| From | Dan Levy, Chief Office of Civil Rights |
| Subject | Draft Report –Review of Translation Service for Metro Customers 17-OTH-01 |

The Office of Civil Rights has reviewed the above captioned draft report and consulted with Operations, Communications and Information and Technology Services. These comments reflect the view of all four departments.

Metro currently provides foreign language services that meet or exceed the minimum requirements of the Federal Guidance on serving Limited English Proficiency (LEP) populations. Over the next 12 months it is our plan is to expand these services by offering bus operators the opportunity to self-identify if they speak a foreign language, and the Office of Civil Rights will be embarking on a major training effort to ensure that all employees are familiar with the requirements for serving LEP populations.

When the round of training is completed it is our intent to begin a Mystery Shopper/Mystery Rider/Mystery Caller program to evaluate how well Metro employees are following agency policy in responding to LEP individuals. Employees who provide exceptional service will receive commendations and those that fail to meet the minimum requirements will receive counseling and retraining. Other initiatives will include new I Speak cards to be distributed to locations where our employees greet the public, and continued updating of signage to include pictograms or additional languages.

Metro has contracted with Lionsbridge Inc. to provide live voice translation service by telephone. This service is accessible from every phone at Metro as well as the G-Tels, P-Tels and E-Tels at bus and rail stations. Bus operators are provided with cards that include a Metro number that can be called to access the translation service and instructions will soon be provided to all other staff. Car cards are also installed on buses and rail with the number to call for language assistance.

The Metro website includes human translations for Metro's nine LEP languages and computer (Web) translation for more than 100 additional languages. The computer translations have the following caveat:

Web Translation

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Web translation is provided as a courtesy. Because it is computer-generated, the accuracy of specific words and phrases cannot be guaranteed. To speak with a Metro interpreter, call 323.466.3876.

Sometimes computer translations result in inaccurate or awkward translations, however computer translations are improving and it is anticipated in the next couple of years it may be possible to increase their usage at Metro fixed locations. It is likely that information provided by current web translations may be inaccurate or incomprehensible, and would not meet our standards for customer service. At the end of last year Google Translate released an update of their translation software that significantly improves computer translation, although it is still not equal to human translations. At the present time this improved level of translation is only available for eight language pairs, of which 3 pairs are languages on our list of required translations.

Installing voice translation systems on our fleet is not practical or desirable for the foreseeable future. Operators are not allowed to converse with passengers while a vehicle is in motion, and passengers are not permitted to stand beside the operator (ahead of the limit line) while the bus is in motion. If tablets allowing translations were available an operator would have to stop the service until the person has completed their inquiries. In addition we could likely not prohibit English speaking rides from having access to such tablets. There would be a significant potential for schedule delays, operator major rule violations, and tablets on our system could also compromise the safety of operators and patrons. Specifically, Operator use of the tablets while the bus is in motion would violate Metro's zero tolerance policy on the use of wireless technology.

On board tablets are being used in Nashua, New Hampshire to provide computer based translations for LEP riders. Nashua Transit operates 9, 30 ft buses, 3 trolleys and 9 vans and carries just under 500,000 passengers annually. In Nashua about 20% of the population speaks a language other than English at home compared Los Angeles with about 56% of the total population speaking a language other than English at home. Delays from the use of on board translation would not be as significant an issue in Nashua due to lower ridership (smaller buses/vans), less traffic congestion and the lower percentage of LEP individuals and riders. Nashua Transit is not a reasonable comparator for Metro.

Current estimates are that 95% of the adult population of the U.S. owns or has access to a cell phone. Providing LEP customers with a card indicating the number to call for assistance and the use of live voice translation services by phone, GTel, PTEL and ETel and at our customer facing fixed facilities will provide superior customer service for the foreseeable future. Our emphasis over the next 18 months will be to ensure that all employees are aware of the requirement to assist persons with LEP, and to make them aware of the resources that Metro has available including web and voice, pictograms

Copy of Management Comments

and multi-lingual publications. Allowing operators to self-identify their willingness to assist in language matters will further enhance our customer service.

Metro is also in the process of installing communications equipment that will provide free WiFi services to its transit bus riders. This functionality will allow the rider to obtain translation services via mobile or connect directly to a customer agent that can address their concerns in real time through a web chat session. The intended benefit of this implementation is to empower the transit rider with a variety of translation services and options while at the same time removing the bus operator from this task so that he/she can better focus on the operation and safety of the vehicle. 150 vehicles are currently under test with full fleet implementation expected by 2019.

Google Translate Languages

Listed below are the 103 languages include in the Google Translate App

| | | |
|---|--------------------|-------------------|
| Afrikaans | Hebrew | Persian |
| Albanian | Hindi | Polish |
| Amharic | Hmong | Portuguese |
| Arabic | Hungarian | Punjabi |
| Armenian | Icelandic | Romanian |
| Azerbaijani | Igbo | Russian |
| Basque | Indonesian | Samoan |
| Belarusian | Irish | Scots Gaelic |
| Bengali | Italian | Serbian |
| Bosnian | Japanese | Sesotho |
| Bulgarian | Javanese | Shona |
| Catalan | Kannada | Sindhi |
| Cebuano | Kazakh | Sinhala |
| Chichewa | Khmer | Slovak |
| Chinese (Simplified/Traditional) | Korean | Slovenian |
| Corsican | Kurdish (Kurmanji) | Somali |
| Croatian | Kyrgyz | Spanish |
| Czech | Lao | Sundanese |
| Danish | Latin | Swahili |
| Dutch | Latvian | Swedish |
| English | Lithuanian | Tajik |
| Esperanto | Luxembourgish | Tamil |
| Estonian | Macedonian | Telugu |
| Filipino | Malagasy | Thai |
| Finnish | Malay | Turkish |
| French | Malayalam | Ukrainian |
| Frisian | Maltese | Urdu |
| Galician | Maori | Uzbek |
| Georgian | Marathi | Vietnamese |
| German | Mongolian | Welsh |
| Greek | Myanmar (Burmese) | Xhosa |
| Gujarati | Nepali | Yiddish |
| Haitian Creole | Norwegian | Yoruba |
| Hausa | Pashto | Zulu |
| Hawaiian | | |

The highlighted languages are the 9 languages that Metro currently provides translation services.

Metro Language Translation Service Cards

Language cards that operators provide to LEP transit patrons.



Comparison of Metro Translation System and Google Translate

| | <u>Metro Translation System</u> | <u>Google Translate App</u> |
|---------------------------|--|---|
| Method | The Metro customer service information line provides translation services in 9 languages. Spanish translation services are provided by Metro employees. For the other 8 languages, the caller tells the customer service representative what language is needed. The representative sets up a 3-way call with a company providing translation services and answers the question(s), with the help of the translator. | Google Translate App installed on Tablets placed in each bus to facilitate communication between the operator and the customer. Our review determined that the Google Translate App at the Google website could translate all but one of the 9 languages Metro uses in audio format (Khmer). |
| Cost | Relatively low – \$0.99 per minute for the translation service. In FY 2016, the total cost relatively small. | The Google Translate App is a free download. The Nashua Transit buses already had Tablets installed for another purpose. However, for Metro to use the system, Tablets or other computers would need to be purchased and installed with Internet access, possibly from a service provider. |
| Knowledge/ Information | The same information that is available to any customer. The representative has the whole computer database available to consult (schedules, etc.). This information is also available to customers on Metro’s website. | Limited to the bus operators’ or transit employees’ knowledge. |
| Speed | Somewhat slow because of the connection method. In a test, we found that it took a total of about 9 minutes to get a question answered. The person calling has to identify the language they want in English. | Provides quick and real-time translation, and interaction between the bus operator or transit employee and customer. |
| Hours | Normal customer service hours: 6:30am – 7pm (Monday – Friday) 8:00am – 4:30pm (Saturday – Sunday) | Anytime the bus operator or transit employee is on duty and available to talk. |

Conclusion: These two methods are not duplicative, but could complement each other if used judiciously.

Final Report Distribution

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