



City of New York

OFFICE OF THE COMPTROLLER

Scott M. Stringer
COMPTROLLER



AUDITS AND SPECIAL REPORTS

IT AUDIT

Marjorie Landa

Deputy Comptroller for Audit

Audit Report on the Department of
Consumer Affairs' Development and
Implementation of the Accela System

SI17-075A

June 26, 2017

<http://comptroller.nyc.gov>



THE CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
SCOTT M. STRINGER

June 26, 2017

To the Residents of the City of New York:

My office has audited the Department of Consumer Affairs' (DCA's) development and implementation of the Accela system to determine whether that computer system meets DCA's overall goals and whether it has adequate functions to ensure that the information process is reliable and secure from unauthorized access.

The audit determined that DCA's Accela system is currently operational and generally meets its overall system specifications. However, we found certain system weaknesses. Specifically, we found input fields with insufficient validation checks to ensure the validity of entered data. Further, we found that user access was not consistently disabled for inactive users and former employees, and that DCA did not enforce password expiration rules that would limit access to authorized users.

In addition to these findings, we conducted a User Satisfaction Survey of DCA personnel who use Accela. In response to that survey, a good portion of the respondents reported problems with the system. Specifically, 42 percent of the respondents indicated that the Accela system requires repetitive data entries, 22 percent stated that Accela is not easy to use, and 49 percent would like to see changes made to the system. Further, the survey respondents noted several specific concerns, which include that the system is slow, has frequent crashes, and is hard to search.

The audit makes five recommendations, including that DCA require validation checks for all applicable fields, including for dates and EINs in the Accela system to ensure that only valid data can be entered into the system; terminate access to the Accela system for those individuals who are no longer employed by a City agency; periodically contact external agencies and review the status of the external users and terminate access as appropriate; ensure Accela Account Management Policy and Procedures are enforced for external agency users; and install a lockout feature that automatically disables access to the system if passwords of external users are not changed after 90 days.

The results of the audit have been discussed with DCA officials, and their comments have been considered in preparing this report. Their complete written response is attached to this report. If you have any questions concerning this report, please e-mail my Audit Bureau at audit@comptroller.nyc.gov.

Sincerely,



Scott M. Stringer

TABLE OF CONTENTS

EXECUTIVE SUMMARY	1
Audit Findings and Conclusions	1
Audit Recommendations.....	2
AUDIT REPORT	3
Background	3
Objectives.....	4
Scope and Methodology Statement.....	4
Discussion of Audit Results	4
FINDINGS AND RECOMMENDATIONS.....	5
Data Validation Check Insufficient	5
Recommendation	6
Inappropriate Access to Accela Web-based Application.....	6
Recommendations	7
User Satisfaction Survey	7
Recommendation	8
DETAILED SCOPE AND METHODOLOGY.....	9
ADDENDUM	

THE CITY OF NEW YORK OFFICE OF THE COMPTROLLER AUDITS AND SPECIAL REPORTS IT AUDIT

Audit Report on the Department of Consumer Affairs' Development and Implementation of the Accela System SI17-075A

EXECUTIVE SUMMARY

We audited the New York City Department of Consumer Affairs' (DCA's) development and implementation of the Accela system to determine whether the system meets DCA's overall goals and whether it has adequate functions to ensure that the information process is reliable and secure from unauthorized access.

DCA licenses more than 81,000 businesses in more than 50 industries and enforces key consumer protection, licensing, and workplace laws including the paid sick leave and commuter benefits laws. DCA also inspects businesses to ensure compliance with license and weights-and-measures regulations, and investigates complaints received from the public through 311 and other means. In enforcing these laws and regulations, the agency also provides mediation of consumer complaints and secures restitution for consumers.

In 2011, DCA, under a master contract with the Department of Information Technology and Telecommunications (DoITT), contracted with Accenture LLP to develop a new Enterprise Licensing and Permitting system by customizing the off-the-shelf software from Accela, Inc. to meet DCA's business needs.¹

Audit Findings and Conclusions

Our audit found that DCA's Accela system is currently operational and generally meets its overall system specifications. However, we found certain system deficiencies. Specifically, we found input fields with insufficient validation checks to ensure the validity of entered data. Further, we found that user access was not consistently disabled for inactive users and former employees, and that DCA did not enforce password expiration rules that would limit access to authorized users.

¹ DoITT has a contract with Accela, Inc. for the City's use of Accela's off-the-shelf software. The off-the-shelf software is currently being utilized in other City agencies.

In addition to these findings, we conducted a User Satisfaction Survey of DCA personnel who use Accela. In response to that survey, a good portion of the respondents reported problems with the system. Specifically, 42 percent of the respondents indicated that the Accela system requires repetitive data entries, 22 percent stated that Accela is not easy to use, and 49 percent would like to see changes made to the system. Further, the survey respondents noted several specific concerns, which include that the system is slow, has frequent crashes, and is hard to search.

Audit Recommendations

To address these issues, we made the following five recommendations that DCA should:

- Require validation checks for all applicable fields, including for dates and EINs in the Accela system to ensure that only valid data can be entered into the system.
- Terminate access to the Accela system for those individuals who are no longer employed by a City agency.
- Periodically contact external agencies and review the status of the external users and terminate access as appropriate.
- Ensure Accela Account Management Policy and Procedures are enforced for external agency users. Install a lockout feature that automatically disables access to the system if passwords of external users are not changed after 90 days.
- Consider the users' concerns identified in the User Satisfaction Survey and take appropriate steps to address them.

Agency Response

In its response, DCA generally agreed with four recommendations and stated that one is “already in place.” At the same time, DCA took issue with some findings in the report. However, DCA stated, “We are in the process of upgrading Accela. The tentative release for the upgrade is August 2017. With the release of new features by Accela, the upgrade is intended to address certain concerns upon rollout.”

AUDIT REPORT

Background

DCA licenses more than 81,000 businesses in more than 50 industries and enforces key consumer protection, licensing, and workplace laws including the paid sick leave and commuter benefits laws. DCA also inspects businesses to ensure compliance with license regulations and weights-and-measures regulations, and investigates complaints received from the public through 311 and other means. In enforcing these laws and regulations, the agency also provides mediation of consumer complaints and secures restitution for consumers.

In 2011, DCA, under a master contract with DoITT, contracted with Accenture LLP to develop a new Enterprise Licensing and Permitting system called Accela. Accenture was tasked with customizing the off-the-shelf software from Accela, Inc. to meet DCA's business needs. DCA served as the project manager, while DoITT provided technical expertise and support. DCA also utilized DoITT's contract with Gartner, Inc. to provide Project Management and Quality Assurance (PMQA) services to help oversee Accenture's development and implementation of the Accela system.

Implemented in October 2013, DCA's Accela system (Accela) is designed to improve the agency's workflow management and to make licensing easier for businesses by expanding online services.² Accela is used by DCA's various divisions to carry out their respective business functions, as follows:

- The **Licensing Division** uses Accela to process all license and permit applications.
- The **Enforcement Division** uses Accela to schedule and track inspections conducted to ensure compliance with the Consumer Protection and Licensing Laws, weights-and-measures regulations, and to process inspection requests received from other DCA divisions and the public.
- The **Collection Division** uses Accela in its efforts to collect fines from licensed and unlicensed businesses for violations of applicable laws and regulations.
- The **Finance Division** uses Accela to process and reconcile payments received from businesses for application fees and imposed fines, and to process bad check restitution and refunds.
- The **Consumer Service Division** uses Accela to log and track complaints received from the public through 311 and other means.
- The **General Counsel Division** uses Accela to process cases against violators of all types of licenses.

Overall, DCA's contract with Accenture LLP was valued at approximately \$27.7 million and covered the period of August 2011 through July 2014.

² DCA's businesses licenses include "premise licenses" and "individual licenses." Examples of premise licenses are those issued to electronic stores and auction houses. Individual licenses are issued to locksmiths, home improvement salespersons, and others. In this report, we use the term business(es) to refer to all DCA licensees.

Objectives

The objectives of this audit were to determine whether Accela, as a finished product:

1. Meets DCA's overall goals as stated in the system specifications; and
2. Has adequate functions to ensure the information process is reliable and secure from unauthorized access.

Scope and Methodology Statement

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, and 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 the audit objectives. This audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, §93, of the New York City Charter.

The scope of this audit was from the implementation of the system in October 2013 to May 2017. We conducted fieldwork from September 2016 to May 2017. Please refer to the Detailed Scope and Methodology at the end of this report for the specific procedures and tests that were conducted.

Discussion of Audit Results

The matters covered in this report were discussed with DCA officials during and at the conclusion of this audit. A preliminary draft report was sent to DCA and was discussed at an exit conference on May 26, 2017. On June 6, 2017, we submitted a draft report to DCA with a request for comments. We received a written response on June 20, 2017. In its response, DCA generally agreed with four of the five recommendations and stated that one aspect of the remaining recommendation—that it install a lockout feature to automatically disable access to the system if an external user's password is not changed after 90 days—was “already in place.” However, that response does not address the audit's finding that six external users had successfully accessed the system even though 90 days had passed since their passwords had been changed. In addition, DCA reported that it was upgrading Accela, with a tentative release for August 2017, which it expects will address several concerns raised by its users in the User Satisfaction Survey conducted during the audit.

The full text of DCA's response is included as an addendum to this report.

FINDINGS AND RECOMMENDATIONS

Accela is currently operational and generally meets its overall system specifications. However, we found certain system deficiencies. Specifically, we found input fields with insufficient validation checks to ensure the validity of entered data. Further, we found access and security control weaknesses in that user access was not consistently disabled for inactive users and former employees, and DCA did not enforce password expiration rules that would limit access to authorized users.

In addition to these findings, we conducted a User Satisfaction Survey of DCA personnel who use Accela. In response to that survey, a good portion of the respondents reported problems with Accela. Specifically, 42 percent of the respondents indicated that the system requires repetitive data entries, 22 percent stated that Accela is not easy to use, and 49 percent would like to see changes made to the system. Further, the survey respondents noted several specific concerns, which include that the system is slow, has frequent crashes, and is hard to search.

These matters are discussed in greater detail in the following sections of this report.

Data Validation Checks Are Insufficient

We found data entry fields in the Accela system that do not have validation checks that automatically flag and reject impossible dates. A validation check is an automatic computer check that ensures that the data entered meets certain rules (e.g., required character type, length, date ranges, etc.). Comptroller's Directive #18, states that "[i]nput controls are designed to ensure accuracy, completeness and timeliness of the data when it is converted to the electronic format readable by the agency's information processing systems. Input controls cover data entry, data conversion, data validation, editing, and error handling."

During our systems test, we observed that although the system had validation checks for some fields, such as date of birth, it did not have certain checks for others. Specifically, the system allowed entry of future dates for events that, by definition, had to have already occurred. For example, the system indicates that two cases were assigned to the enforcement division: one on April 2, 9008 and the other on August 13, 8013. Clearly, that information is incorrect. By allowing those errors, the system cannot ensure that the information it accepts regarding the initial assignment of cases to the enforcement division is accurate, which in turn impairs DCA's ability to properly track those matters for various purposes, including the time that elapses between their assignment and the outcome of that assignment.

We also found that Accela did not perform data validation for the data field that recorded Employer Identification numbers (EINs). Although all EINs are 9 digits long, we observed EINs recorded in Accela that contained 10 or 11 digits. We also observed EINs in the system with and without a hyphen. Such errors and variations may result in the creation duplicate records relating to a single business. For example, we noted that one business with the same address had two contact records in the system: one where the EIN number was recorded with a hyphen and the other with version of the same EIN without a hyphen. Duplicate records can result in a number of undesirable effects, including the possibility that records-searches by EIN may produce incomplete results, and conversely that searches could yield duplicate entries reflecting the same or overlapping events. At the exit conference, DCA officials explained that the EIN field does not have a data validation check because the old system contained social security numbers as well

as EINs. Although this may explain why the system has this weakness, it does not justify the weakness or provide a solution to the problems the weakness poses.

Validation checks are used for a system as a best practice to minimize data entry errors and improve the accuracy of the data in the system. Without validation checks, there is a greater possibility of erroneous data being entered into the system.

Recommendation

DCA should:

1. Require validation checks for all applicable fields, including for dates and EINs in the Accela system to ensure that only valid data can be entered into the system.

DCA Response: “The agency agrees with the recommendation to require validation checks for all applicable fields.” However, DCA took issue with the accuracy of what it referred to as “the characterization of the design and use of the EIN and Tax ID fields” and in sum and substance reiterated its explanation that data of differing lengths and formats “came over” to the Accela EIN field from DCA’s “legacy system” and “needs to be cleansed.” DCA added that it had “assessed data cleansing efforts and determined a feasible solution.”

Inappropriate Access to Accela Web-based Application

DCA did not ensure that access to its Accela Web-based application was promptly deactivated for former employees and inactive users, such as employees on long-term leave.³ It has, thereby, increased the risk that information in Accela, including permit applicant information, could be improperly disclosed. DCA is responsible for creating, monitoring, and disabling access to its application when the status of a user changes.

DoITT's Identity Management Security Policy states that “[u]ser accounts [should] be created and de-provisioned in a timely manner.” Comptroller’s Directive #18, Section 8.1.2 requires the “[d]eactivation of inactive user accounts and accounts for employees whose services have been terminated.”

We received and analyzed a list of 466 Accela users’ accounts that were active as of January 11, 2017 and found that 42 of the active DCA Accela users were listed in the City’s Payroll Management System (PMS) as former employees or employees on long-term leave.⁴ Much of the information maintained on the Accela system is about individual businesses and it considered confidential and supposed to only be available for authorized use. Therefore, it is important for DCA to appropriately deactivate former employees and inactive users in a timely manner.

In addition, we found that DCA does not comply with its Accela Account Management Policy and Procedures which require that the passwords for external users must be changed every 90 days and if they do not, the “[e]xternal user accounts will automatically [lock] after 90 days.” However, for 40 (66 percent) of the 61 external agencies’ active users, it is impossible to determine whether the password has not been active for more than 90 days since the “last login” information or “last

³ Long-term leave is an employee who needs extended time off, such as with child care leave; or approved leave without pay due to illness.

⁴ Of the 466 active Accela users, 405 were DCA employees and 61 were employees from other City agencies. Of the 42 user accounts that should have been disabled, 34 were former or inactive DCA employees and 8 were former or inactive employees from other City agencies.

change password” information was not recorded. Of the remaining 21 user accounts that had recorded the last login information, we found that 6 (29 percent) of those users were still able to log into the system even though 90 days had passed since the password had been changed.

Adequate controls over system access and continual system monitoring reduces a system’s vulnerability to security breaches as well as the opportunity for system misuse.

Recommendations

DCA should:

2. Terminate access to the Accela system for those individuals who are no longer employed by a City agency.
3. Periodically contact external agencies and review the status of the external users and terminate access as appropriate.
4. Ensure Accela Account Management Policy and Procedures are enforced for external agency users. Install a lockout feature that automatically disable access to the system if passwords of external users are not changed after 90 days.

DCA Response to Recommendations 2, 3 and 4: “The agency agrees to the recommendations with respect to terminating external user access and periodic reviews. We will be conducting a review of external users and implementing a process to remove secondary access that is no longer needed.

With respect to the lockout feature that is recommended, this feature is already in place. The Accela system currently disables access if the password of an external user is not changed within 90 days, therefore, no action is necessary.”

Auditor Comment: As mentioned in the report above, we found that 6 (29 percent) of 21 external users had successfully accessed the system even though more than 90 days had passed since their passwords had been changed. That finding is in conflict with DCA’s statement that the 90-day lockout feature is already in place, unless DCA installed or activated that feature after our audit test. Therefore, we recommend that DCA determine why the Accela system did not disable the access of the 6 abovementioned users, and in addition, test the system as necessary to ensure that the lockout feature is activated and working.

User Satisfaction Survey

The experiences and concerns of the users are vital to determining whether Accela has adequate functions and if it is meeting the needs of its users. To better understand the users’ experiences, we distributed a User Satisfaction Survey to all 405 DCA internal active users identified on our user list on March 7, 2017. We received 175 survey responses as of March 28, 2017, which is a 43 percent response rate.⁵ Among other things, the User Satisfaction Survey responses reflected that:

- 22 percent of the respondents indicated that Accela is difficult to use;
- 42 percent of respondents observed that the system requires repetitive data entries; and

⁵ We determined that the responses were valid after removing any duplicates and/or blank responses.

- 49 percent of respondents represented that they are “somewhat happy” with the system but would like to see some changes made to it.

In addition, the survey responses revealed that, although DCA provides training for new users, 17 percent of respondents indicated that additional training is not available and 14 percent said they needed more training.

The last item on the User Satisfaction Survey asked respondents for comments or suggestions about Accela. Out of the 175 responses received, 107 respondents provided comments and/or suggestions. The comments reflected the respondents’ experiences using Accela, which include the following:

- 13 percent of the comments indicated that the system was slow;
- 13 percent of the comments indicated that the system had unexpected log outs;
- 13 percent of the comments indicated that it is difficult to search on the system;
- 11 percent of the comments indicated that too many steps were needed when using the system; and
- 4 percent of the comments indicated that the user was satisfied with the system as it is.

Specifically comments included “Accela crashing constantly & is at times extremely slow. The conditions tab almost always crashes when satisfying condition.” Another respondent stated, “It would be very helpful if Accela were less sensitive to small nuances in data entered in terms of its search options. For example, if a company name does not match the Accela entry exactly, it is impossible to locate using the search feature. The same is true for addresses and incomplete record numbers.” Still another respondent commented, “The system doesn't connect often. It takes way too many steps to do one thing. Finding accurate licensing isn't always easy.”

Recommendation

DCA should:

5. Consider the users’ concerns identified in the User Satisfaction Survey and take appropriate steps to address them.

DCA Response: “The agency agrees with respect to the users' concerns about the system and will be taking appropriate steps to address them.”

DETAILED SCOPE AND METHODOLOGY

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. This audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, §93, of the New York City Charter.

The scope of this audit was from the system implementation in October 2013 to May 2017. We conducted fieldwork September 2016 to May 2017. To achieve the audit objectives, we:

- Interviewed the DCA Information Technology department;
- Reviewed the DCA Organization Chart to gain an understanding of the administration of Accela;
- Reviewed the system specifications in Accenture's contract with DCA to determine whether the Accela system matches the approved system specifications;
- Conducted a system walk-through of Accela to gain an understanding of how DCA's personnel performed their tasks and operations, including the Division of Licensing, Enforcement, Consumer Service, Case Support and Settlement, Collection, and Finance;
- Reviewed user manuals, Job Aids, and attended the training session to gain an understanding of Accela usage and to determine whether the users were appropriately trained;
- Reviewed user roles and segregation of user functions to gain an understanding of the internal controls that exist in Accela;
- Determined whether DCA Accela user access controls complied with Comptroller's Directive #18 and DoITT's Identity Management Security Policy, and Password Policy;
- Reviewed contracts, amendments, and work orders to understand the project scope and contractors' responsibilities;
- Reviewed and analyzed system specifications as stated in the original Request For Proposal as a basis to determine whether system deliverables were implemented and completed on schedule;
- Reviewed and analyzed conversion plan to verify whether DCA had processes and procedures in place to ensure data converted from the legacy systems to the new system was accurate, complete, and successful;
- Reviewed interface designs and validation messages to ensure the information processing is reliable;
- Requested and reviewed test plans and user acceptance testing sign-off documentation to determine whether DCA had quality assurance tests in place;

- Performed system tests by selecting 15 percent (9) of all 55 license types and created case scenarios on the staging environment to determine whether Accela fulfilled the system specifications;
- Reviewed the list of 466 active users and performed test with PMS to determine whether these users are active City employees;
- Examined the Accela user list to determine whether DCA users were listed as active employees on the City's Payroll Management System;
- Reviewed DCA's Accela Account Management Policy and Procedures and Its Password Management and Security Policy to determine whether it complied with Comptroller's Directive #18 and DoITT's Identity Management Standard, Identity Management Security Policy, and Password Policy;
- Performed password test on the Accela System to determine whether password is in compliance with password policy;
- Reviewed the DCA Continuity of Operation Plan to determine whether DCA has a contingency plan in place in case of an emergency;
- Reviewed Accela's backup and retention policy from DoITT to determine whether there are controls in place to support business continuity; and
- Conducted a User Satisfaction Survey to determine whether the data in the Accela system was reliable and if users were satisfied with the system. We received a list of 405 current DCA Accela users as of January 18, 2017. We distributed the surveys to all 405 DCA internal active users identified on our user list on March 06, 2017 and received 175 valid responses as of March 28, 2017. The survey also provided information on users' feedback regarding Accela usability, information accuracy, sufficiency in training and effectiveness of troubleshooting.



Lorelei Salas
Commissioner

42 Broadway
8th Floor
New York, NY 10004

nyc.gov/consumers

June 20, 2017

Ms. Marjorie Landa
Deputy Comptroller, Audit Bureau
Municipal Building
1 Center Street, Room 1100 North
New York, New York 10007

RE: Audit Report on the Department of Consumer Affairs' Development and Implementation of the Accela System SI17-075A

Dear Deputy Comptroller Landa,

The Department of Consumer Affairs (DCA) has reviewed the City Comptroller's draft audit report regarding the development and implementation of the Accela System.

DCA is pleased the report states that the Accela system meets its overall system specifications. The Accela implementation was a major undertaking for the agency, improving workflow management and making licensing easier for businesses through online services. The application has delivered benefits through operational efficiency, transparency, automation, additional online services for applicants and advanced reporting functions.

The agency values your office's assessment as we strive to continuously improve application functionality. We appreciate the recommendations as they relate to data integrity, user security and the user experience. Our comments with respect to the recommendations are detailed below.

Responses to Recommendations

1. Require validation checks for all applicable fields, including for dates and EINs in the Accela system to ensure that only valid data can be entered into the system.

The agency agrees with the recommendation to require validation checks for all applicable fields.

However, the characterization of the design and use of the EIN and Tax ID fields is not accurate. There are two separate fields for this data in Accela – one for EIN and another for tax ID. Since go-live in the Accela system, the agency has been using both fields to process license applications.

The EIN and Tax ID values in the legacy system (CAMIS) were stored in one field. As a result, during data conversion, the data came over into one field in Accela. In order to limit the field length for EIN to 9 characters, legacy data needs to be cleansed to separate the information into respective fields. We have assessed data cleansing efforts and determined a feasible solution for resolution.

Based on business requirements, it is possible to strengthen the validation checks on the date and EIN fields.

2. **Terminate access to the Accela system for those individuals who are no longer employed by a City agency.**
3. **Periodically contact external agencies and review the status of the external users and terminate access as appropriate.**
4. **Ensure Accela Account Management Policy and Procedures are enforced for external agency users. Install a lockout feature that automatically disables access to the system if passwords of external users are not changed after 90 days.**

External users login to the Accela system through their agency's Windows account. Without access to their agency's Windows account, external users will not be able to login to Accela. Therefore, risk is mitigated where users are prevented from gaining access to the system.

The agency agrees to the recommendations with respect to terminating external user access and periodic reviews. We will be conducting a review of external users and implementing a process to remove secondary access that is no longer needed.

With respect to the lockout feature that is recommended, this feature is already in place. The Accela system currently disables access if the password of an external user is not changed within 90 days, therefore, no action is necessary.

5. **Consider the users' concerns identified in the User Satisfaction Survey and take appropriate steps to address them.**

The agency agrees with respect to the users' concerns about the system and will be taking appropriate steps to address them. We have already identified pre-existing user issues with Accela, those of which have been raised in the survey. We are in the process of upgrading Accela. The tentative release for the upgrade is August 2017. With the release of new features by Accela, the upgrade is intended to address certain concerns upon rollout. Specifically, the new features include: redesigned work flows, user interface and usability; enhanced Record Summary and Record Details Pages leading to improved performance; a new Dynamic Task Dashboard; and better user experience when using Work Spaces and Search Space for multitasking purposes. We will work towards fuller resolution after the upgrade and develop a plan with established timeframes.

Thank you for your consideration of our responses.

Sincerely,



Lorelei Salas
Commissioner

cc: George Davis, Mayor's Office of Operations
Sandra Abeles, Consumer Affairs
Jordan Reisner, Consumer Affairs