



## **FRAUD CONTROLS IN THE PARATRANSIT ZERO-FARE METROCARD PROGRAM**

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### **INTRODUCTION**

The MTA NYC Transit Paratransit Division (Paratransit) has provided transportation to riders with disabilities for 20 years through its Access-A-Ride program (AAR). In June 2012, in an effort to reduce costs, the MTA Board authorized Paratransit to establish a Zero-Fare MetroCard program (Zero-Fare). The program, offering free travel to AAR-eligible customers on fixed route service (subways and buses), was first proposed in February 2012 in a report to the MTA by McKinsey & Co., an MTA consultant. The concept of the program is that by encouraging customers to use mass transit instead of individualized AAR services whenever feasible, Paratransit would save the cost of providing those AAR services, which average \$66 per trip. Indeed, McKinsey projected that by 2015, Zero-Fare would reduce expected demand for Paratransit services by 15 percent and result in annual savings to the agency of more than \$90 million.

Notably, though, when Zero-Fare was approved, McKinsey, NYC Transit and the MTA Board all expected that strong controls and oversight would be developed, implemented, and enforced to limit fraudulent use of the new Zero-Fare cards. For its part, Paratransit promised the Board that proper controls would be in place.

Paratransit began issuing Zero-Fare MetroCards in April 2013, with an expected roll-out over time to all 161,000 AAR-eligible customers. The card will also serve as the customer's primary identification for all AAR services. By March 2014, Paratransit had mailed out over 40,900 Zero-Fare MetroCards on a random basis. As part of continuing efforts by the Office of the MTA Inspector General (OIG) to help ensure effective and efficient Paratransit services, the OIG conducted a review of the Zero-Fare program. Our primary purpose was to determine whether proper controls are in place to adequately deter and expeditiously detect improper use of the cards.<sup>1</sup>

According to our review, although Paratransit has been issuing Zero-Fare cards for more than one year, the agency has not yet created the comprehensive system of controls that it promised

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<sup>1</sup> Audit Services, the MTA's internal auditor, is engaged this year in analyzing whether the Zero-Fare MetroCard program is attaining the reduction in Paratransit ridership and associated cost savings projected by McKinsey.

when the program was first proposed. In particular, we found that the agency does not conduct analysis to detect fraud specifically associated with this program, nor has it established the data-sharing protocols between Paratransit and the NYC Transit MetroCard Fraud Unit necessary to identify patterns of abuse. Further, Paratransit has not established policies and procedures for suspension and/or revocation of Zero-Fare privileges when fraud is suspected or after it has been established.

In addition to these operational concerns, we believe NYC Transit needs to reconsider its plan to distribute Zero-Fare cards to all Paratransit customers randomly, without any notice that the card is in the mail, let alone any request for the card by the customer or any commitment by the customer to be responsible for it. Issuing cards to all Paratransit customers without these or any other controls greatly increases the risk that the Zero-Fare cards will fall into the wrong hands resulting in abuse of the program benefits.

In its written response to OIG's preliminary report, NYC Transit confirmed that it was in general agreement with the report's findings and recommendations but noted that it could not implement our fifth recommendation, regarding post-issuance card activation, because of technical limitations. "Notwithstanding," it said, "Paratransit is continuing to evaluate the Zero-Fare MetroCard Program considering the [OIG's] findings, and will develop complimentary controls."

OIG is encouraged by NYC Transit's response. Going forward, we will continue to monitor as appropriate the agency's implementation of our recommendations and its efforts to develop fraud controls, particularly those efforts to reduce the risks presented by unsolicited but activated Zero-Fare MetroCards.

## **FINDINGS**

The Zero-Fare MetroCard is intended to serve two distinct purposes for Paratransit customers. On the one hand, the customer may present the card as identification when using AAR services, although the customer must still pay \$2.50 in cash for each use of that service. On the other hand, when using the card on public transit, the customer is allotted up to four free one-way rides per day to be used personally on NYC Transit subways, NYC Transit and MTA Bus local buses, and MTA Staten Island Railway. Further, if the customer is authorized to travel with a Personal Care Attendant (PCA), the card is encoded to allow up to four additional one-way trips for use by the accompanying PCA, for a combined maximum of eight one-way trips per day.

Given the large number of Zero-Fare MetroCards distributed and the lack of controls on their use, the OIG conducted analyses involving the following large and separate NYC Transit databases to identify potential fraud:

- A listing of all 161,000 Paratransit customers as of January 2014.
- All Zero-Fare MetroCard usage by Paratransit customers for the 6-month period September 2013 to through February 2014.

- All trips taken by Paratransit customers in AAR vehicles for the 3-month period September 2013 to November 2013.

Our preliminary analysis showed that of the 30,919 Zero-Fare MetroCards issued randomly to Paratransit customers in 2013, only 10,338 (34 percent) of these cards had actually been used even once in the 6-month period of September 2013 through February 2014. We then combined and analyzed the databases focusing on the usage of these 10,338 cards during the 6-month period.

### **Inconsistent Customer—PCA Travel**

Of the various potentially fraudulent patterns we looked for during our review, the analysis of PCA trips is particularly useful because misuse of this type is a highly reliable indicator of fraud. As stated above, a Zero-Fare MetroCard for a customer authorized to travel with a PCA is encoded to be used for a maximum of eight rides per day. Explicit in this authorization is the expectation that the PCA will accompany the customer. Indeed, unlike the unlimited-ride regular MetroCard that has an 18-minute waiting period between swipes during which it cannot be used, the Zero-Fare MetroCard does not have any waiting period between swipes precisely because the PCA is expected to swipe immediately after the customer.<sup>2</sup> Thus, in normal use, when a Paratransit customer and the PCA are traveling together, the MetroCard system will record up to eight swipes for them, but the swipes should be in groups of two, in close proximity, at up to four different periods during the day. However, if analysis shows that five or more of the eight trips are widely distributed during the day, that distribution especially in combination with other indicators (e.g. use at a non-accessible station), shows that swipes reserved for a PCA, had been fraudulently used.

We analyzed all MetroCard data for the 6-month period to identify instances where Zero-Fare cards were used from five to eight times in one day with all of the trips occurring at different times. The analysis showed that 5,888 out of the 10,338 customers in our sample who are using Zero-Fare cards are PCA eligible. Out of the Zero-Fare cards issued to those customers, 612 (10 percent) were used excessively<sup>3</sup> for 3,211 trips on 2,111 days. In fact, one of the Zero-Fare MetroCards was used excessively on 54 days (30 percent) of the six-month period. These excessive trips are almost certainly fraudulent.

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<sup>2</sup> MetroCard officials stated that Zero-Fare MetroCards could not be programmed to allow two uses and then an 18-minute waiting period. It is apparently also not currently possible to program the Zero-Fare card to subtract one of the PCA-allotted rides if a second swipe did not follow the first in quick succession.

<sup>3</sup> By excessive use we mean the card's 5<sup>th</sup> through 8<sup>th</sup> swipes were made at widely distributed times during the day.

## Zero-Fare MetroCard Usage at Non-Accessible Stations

OIG also analyzed data on Zero-Fare card use for the 6-month study period to determine if the cards of customers who need wheelchairs were being swiped in at non-accessible stations. In our population of 10,338 active Zero-Fare card users, there are 750 who use wheelchairs. The analysis shows a significant amount of fraudulent use of the cards issued to these customers. Specifically, 307 Zero-Fare cards (41 percent) of those issued to customers who rely on wheelchairs were swiped a total of 9,222 times at non-accessible stations.

## Detailed Analysis of Individual Zero-Fare MetroCard Usage

We also analyzed individual card usage to determine if fraudulent use can be readily identified on that level. The following three case studies clearly evidence fraudulent use of the Zero-Fare program by individuals—though likely not the customers—and illustrate the need for strong controls to deter and detect any such use:

### *Case Study 1: Ms. X*

Ms. X, 45, uses a wheelchair, has an artificial limb, and is eligible to travel with a PCA. She received a Zero-Fare MetroCard, which was first used (by someone) in October 2013. We find that her Zero-Fare card was fraudulently used based on the following:

1. Five times in the fall of 2013, Ms. X used Paratransit vehicles at or about the same time that her Zero-Fare MetroCard was used on public transit.
2. Ms. X's Zero-Fare MetroCard was used 185 times at stations that are not wheelchair accessible, including 118 times at the York Street Station on the F Line. The card was occasionally used at other non-accessible stations, such as Sutter Avenue on the 3 Line, Sterling Street on the 2/5 Line, and Winthrop Street on the 2/5 Line.
3. Over the course of 34 separate days, Ms. X's Zero-Fare card was used for one or more additional trips per day beyond the four daily trips allotted to her personally. While these additional trips were authorized only for an accompanying PCA, the times for the trips on the relevant days were widely dispersed, which is inconsistent with customer—PCA travel.
4. Before she received the Zero-Fare MetroCard, Ms. X made an average of 10 trips per month using an AAR vehicle. After receiving her Zero-Fare card in October 2013, her number of AAR trips per month did not change, but her Zero-Fare card was used on public transit an average of 109 times per month.

***Case Study 2: Mr. Y***

Mr. Y, 80, uses a wheelchair, has some serious medical conditions, and is eligible to travel with a PCA. He received a Zero-Fare MetroCard in April 2013. We find that his Zero-Fare card was fraudulently used based on the following:

1. Over the course of 22 separate days, Mr. Y's Zero-Fare card was used for one or more trips per day beyond the four daily trips allotted to him personally. While these additional trips were authorized only for an accompanying PCA, the times for the trips on the relevant days were widely dispersed, which is inconsistent with customer—PCA travel.
2. Although Mr. Y. used a wheelchair, his Zero-Fare card was used 141 times at stations that are not wheelchair accessible—which is particularly suspicious given the absence of an accompanying PCA-type swipe for all but six of these trips.
3. On 57 days, Mr. Y's MetroCard use shows a commuter pattern—taking one trip at 9-10 a.m. and a return trip at 5-6 p.m. Notably, when Mr. Y filed his recertification for AAR in 2011, he reported that he was unemployed.
4. Mr. Y's Zero-Fare card was used 652 times in the period September 2013 through February 2014—an average of 109 times per month.

***Case Study 3: Ms. Z***

Ms. Z, 91, suffers from a variety of illnesses that involve cognitive impairment, including Alzheimer's disease. She also uses a cane and is eligible to travel with a PCA. Her Zero-Fare card was first used in October 2013. We find fraudulent usage of that card based on the following:

1. The usage indicates a consistent “commuting” pattern even though Ms. Z reported that she was retired when she applied for AAR certification in 2012. But even assuming that Ms. Z, who lives in Manhattan, had a reason to commute and was capable of doing so, the direction of travel operated in reverse. That is, for five days a week from October 2013 through February 2014, her Zero-Fare card was used for subway and bus trips that started around 8 a.m. in Queens and proceeded west toward her home in Manhattan; the return trip began in Manhattan, at about 2 p.m. and proceeded east toward Queens. Additionally, as shown immediately below, Ms. Z's card was almost always used without an accompanying PCA-type swipe.
2. Ms. Z used AAR service 12 times in September 2013, 4 times in October, and 3 times in November (the last month for which AAR data is currently available). However, from October 2013 through February 2014, her Zero-Fare MetroCard was used 517 times on

public transit—an average of 103 times per month. Only two of the 517 uses were PCA-type swipes.

### **Excessive Zero-Fare MetroCard Trips Compared to Paratransit Usage**

In our detailed review of individual Zero-Fare usage, we pulled data for 20 Zero-Fare MetroCards that were used over 200 times during the 6-month study period and had indications of fraud similar to those in the case studies above. We found that these 20 cards were used 9,735 times during our six month study period for free rides on public transit, averaging 81 times per month. Given the high level of usage, this is not likely a mistake or occasional misuse on the part of the Paratransit customer.

By contrast, the same 20 customers to whom these Zero-Fare cards were issued took an average of nine AAR trips per month during the period September through November 2013.<sup>4</sup> While a number of the Zero-Fare MetroCard trips may have replaced AAR trips for these customers (as the Zero-Fare program was designed to do), we find it difficult to believe that upon being issued Zero-Fare MetroCards, these disabled individuals suddenly changed their normal modes of travel and used public transportation nine times *more often* than they used AAR vehicles. To the contrary, we believe this evidence supports our view that these 20 cards were being used, in whole or in part, by someone other than the Paratransit customers to whom they were issued. This type of analysis, which correlates Paratransit trip usage with Zero-Fare MetroCard usage, is not currently being performed by Paratransit or by the MetroCard Fraud Unit.

### **Fraud Analysis Is Lacking**

In our analysis of the 10,338 cards, we looked for indicators of fraud that could be used by Paratransit to identify misuse. The following red-flag indicators of fraud were common, often appearing in combination for the same user, and can be electronically monitored by NYC Transit:

- Zero-Fare MetroCard usage on public transit at or about the same time of day that the customer used AAR services. More than a mere indicator, this type of usage is evidence of actual fraud given that the customer cannot be in two places at once.
- Cards of customers needing wheelchairs or walkers being used at non-accessible stations.
- Trips allotted to customers and PCAs being used at different times during the day, as opposed to a normal pattern of two trips at the same time—one for the customer and one for the PCA.
- Much higher usage of Zero-Fare card in comparison to past Paratransit usage.
- Cards being used for frequent round-trips that started and ended in a borough different from the customer's home address.

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<sup>4</sup> As noted above, November 2013 is the last month for which AAR data was available during the field work for this review.



Notably, though, when we questioned Paratransit and MetroCard officials about how they monitor Zero-Fare MetroCard usage for fraudulent patterns, we found that no analysis specific to the Zero-Fare program is being done by either unit. For example, the head of the MetroCard Fraud Unit agreed that the unit has not set up new analytical queries that would catch the behavior we identified in our cases. He also asserted that he has not been given access to the Paratransit customer information, such as home address or age, that would be needed to conduct such analysis, and that his unit was not responsible for requesting the information. Paratransit officials on the other hand claimed that they rely on the MetroCard Fraud Unit for such analysis, although they provided no basis for expecting such analysis, let alone relying on it.

In late February 2014, the information technology director at Paratransit told us that while his agency did not then have the data necessary to perform the required analyses, he had reached an agreement with the MetroCard Fraud Unit as to the format of MetroCard databases that the Unit would be providing weekly (at some future time) to Paratransit to identify Zero-Fare MetroCard usage individually by card. However, he also told us that he has not received any instruction from senior Paratransit management as to how they want him to review those databases or how to identify patterns of fraudulent activity. Indeed, we did not find anyone in Paratransit or the MetroCard Fraud Unit who is accountable for the detection and prevention of fraud or other abuse in the Zero-Fare program.

### **Fraud Controls Proposed to the MTA Board Have Not Been Fully Established**

When MTA officials first proposed the Zero-Fare initiative to the MTA Board in April 2012, board members expressed interest but also voiced concerns regarding the potential for fraud in the program. These officials assured the board members that appropriate controls would be put in place to minimize the risk of cards being abused. For example, they noted that the Zero-Fare MetroCard would include a photograph and have its own unique color coding; bus drivers would check the photographs when the cards were used; undercover teams would check for proper card usage in subway stations; the existing system of special purpose lights on subway turnstiles that are triggered when special purpose cards are swiped would be updated to include the new Zero-Fare cards; and the agency would monitor the cards for high usage, especially in unexpected patterns. MTA officials based their assurances on the McKinsey report, which emphasized the need for a more sophisticated system of flags and called for additional fraud prevention measures on top of NYC Transit's existing processes, including the hiring of three additional staff members who would "data-mine" user trips and flag unusual patterns. The McKinsey report also asserted that NYC Transit guidelines should require that Zero-Fare cards, like regular MetroCards, be deactivated immediately in the event of suspected fraud. The MTA Board went on to approve the Zero-Fare MetroCard program two months later.

OIG staff met with Paratransit officials to discuss the promised controls and found that some were implemented. For example, in April and July 2013, NYC Transit's Buses and Stations departments issued bulletins to their personnel informing them of the new MetroCards. The flashing red light indicator at subway turnstiles and on buses that signals use of a Reduced-Fare MetroCard was expanded to also signal use of a Zero-Fare MetroCard. Additionally, the new

Zero-Fare MetroCards contain a photo of the customer and are color-coded gray for male Paratransit customers and purple for female customers. These controls allow NYPD personnel, as well as the MTA's Eagle Team, which combats fare evasion on buses, to spot-check riders and verify that the particular MetroCard used was issued to them. As discussed below, however, Paratransit has not implemented critical controls promised to the MTA Board.

### **Fraud Detection System Not Established**

Until very recently, no NYC Transit unit was performing any fraud-detection analysis specific to Paratransit customers' use of Zero-Fare MetroCards. Indeed, while the establishment of ongoing analysis of the Zero-Fare MetroCard swipe data to detect fraud was an essential component of the program envisioned by McKinsey and promised by MTA officials to the MTA Board, we found that Paratransit only began to receive MetroCard data in late April 2014 and as of the beginning of June had not yet begun to analyze it. Significantly, the McKinsey study stressed the need for fraud detection, quoting a Los Angeles transit official regarding that city's zero fare program: "This is a great initiative if you have a strong eligibility assessment procedure, and *you have a strong fraud detection system in place* [emphasis added]."

In particular we believe, as McKinsey recommended, that resources are needed to conduct analyses combining Zero-Fare MetroCard usage data with Paratransit trip and customer data. For example, as the OIG's analyses (page 2) illustrates, the combined data could be used to identify:

- Instances of Zero-Fare MetroCard usage and Paratransit trips being taken simultaneously.
- Very elderly customers with incongruous commuter-usage patterns.
- Frequent round trips originating in boroughs other than the Paratransit customer's home borough.
- Customers needing wheelchairs using non-accessible stations, especially when unaccompanied by a PCA (as evidenced by no accompanying PCA-type swipe).
- Usage of PCA-allotted trips in addition to those allotted to the customer (meaning a total of five to eight daily trips), at different times during the day, as opposed to the normal PCA pattern of two trips at the same time—one for the customer and one for the PCA.
- Much higher usage of Zero-Fare card versus past Paratransit usage.

Just as we found instances of these patterns in our global analysis and in our review of individual cases discussed above, we are confident that competent staff assigned to fraud detection could find additional instances of these and other patterns indicative of Zero-Fare fraud.

### **Many Zero-Fare Cards Are Not Being Used**

As indicated above, NYC Transit plans to provide Zero-Fare MetroCards to all Paratransit customers, totaling 161,000 as of January 2014. In its initial mailings during 2013, the agency sent activated Zero-Fare MetroCards to nearly 31,000 Paratransit customers. Besides the



unsolicited Zero-Fare card, the mailing included a letter and brochure introducing customers to the new program and explaining how to use the card. Customers were neither asked if they wanted an activated card, nor were customers required to apply for a card or sign any agreement acknowledging its restrictions.

We subsequently found that through February 2014 only 10,671 of the cards initially issued, about 35 percent, have actually been used. This leaves over 20,000 unsolicited and unused, but activated Zero-Fare MetroCards at high risk of being used by others, either with or without the knowledge of the Paratransit customers. Since 68 percent of Paratransit customers are PCA eligible, most cards are able to be used eight times each day and as previously stated, when these cards are used, 10 percent of them were abused through fraudulent use of swipes reserved for PCAs. This abuse does not include fraudulent use of the customer's first four trips each day by someone else.

In addition, some cards were sent to customers who rarely used Paratransit services. Indeed, over 5,200 Zero-Fare MetroCards were sent to customers who did not use Paratransit services at all during the period September to November 2013. We found that almost 4,000 were still unused through February 2014.

In other cities with Zero-Fare-type programs, such as Los Angeles and Chicago, the process of giving out free fare cards requires some form of request by the customer. For example, in Los Angeles, paratransit-agency customers have to call the agency's Customer Service Department for what is there called a "Smart" card. All customers are eligible, but only those who express interest are given one. In Chicago, the program is not available to all Paratransit-agency customers: Eligible individuals have to apply for its "Ride Free" permit and meet income limits as well. Neither of these cities distributes free-fare cards to those who have no apparent interest in or ability to use them. Paratransit should consider taking a similar approach with the Zero-Fare MetroCard.

We believe that ideally Zero-Fare MetroCards should not be activated when sent out to customers. Instead, the initial mailing should provide customers with the offer of free subway and bus service and inform them how to request activation of their card. Additionally, the mailing should inform the customer that if the customer requested activation of the card, the card usage would be monitored for fraudulent or other improper use, and that if fraudulent use is reasonably suspected or found, their card may be deactivated and their AAR privileges suspended or terminated as warranted and appropriate.

In our view, further, the 20,000 unused and unsolicited cards already sent out by Paratransit should be deactivated, but only after providing customers with appropriate notice. While we recognize that such a program to limit the risk of fraud may require the commitment of resources and the resolution of logistical, as well as legal and/or technological issues, it is incumbent upon the agency to explore all options and take all actions necessary to protect the program from misuse and fraud.

## Deactivation Should Be a Key Control

Currently, Paratransit has procedures to deactivate Zero-Fare MetroCards for customers who are no longer eligible for Paratransit services. However, the agency has no policy or process to deactivate cards that are being used fraudulently, as is certainly the case, for example, when the Zero-Fare MetroCard is used on public transit at or about the same time of day that the customer used AAR services. Indeed, under current procedures, NYC Transit merely sends a letter with each new Zero-Fare MetroCard, warning the customer that use of the card by any other person may result in the termination of the customer's AAR registration as well as civil and/or criminal penalties. However, NYC Transit has never taken any such enforcement action.

McKinsey stated in its report, and we agree, that appropriate deactivation, as well as suspension and termination, are essential components of fraud control. Accordingly, NYC Transit needs to establish appropriate policies and procedures, including criteria, as well as fair notice that usage of the Zero-Fare MetroCard is being monitored for fraud, and fair warning that the AAR privileges and the Zero-Fare card may be deactivated, suspended, and terminated as warranted.

## Management Oversight Is Needed

The responsibility for establishing effective fraud controls requires coordination between NYC Transit's Fraud Unit and Paratransit, but to date there is none. In our view, the lack of data sharing, the deficiencies in existing fraud controls, and most importantly the lack of clear lines of responsibility for developing, implementing, and enforcing such controls, all point to the need to centralize accountability and responsibility for these essential aspects of the Zero-Fare MetroCard program.

## RECOMMENDATIONS

In order to prevent, deter, and detect fraud within the Zero-Fare MetroCard program, we recommend that NYC Transit:

1. Centralize accountability and responsibility for developing, implementing, and enforcing fraud controls governing the Zero-Fare MetroCard program.

*MTA/Agency Response:*

*NYC Transit confirmed that Paratransit has been authorized to re-invest savings into a fraud prevention/detection unit to develop and implement fraud controls. This unit, composed of one manager and two analysts, will also work closely with NYC Transit MetroCard Operations, which NYC Transit called "critical to the success of this initiative."*

2. Monitor and analyze Zero-Fare MetroCard and Paratransit trip data to detect suspicious patterns of use including but not limited to the following:

- Instances of Zero-Fare MetroCard usage and Paratransit trips being taken simultaneously.
- Usage of PCA-allotted trips in addition to those allotted to the customer (meaning a total of five to eight daily trips), at different times during the day, as opposed to the normal PCA pattern of two trips at the same time—one for the customer and one for the PCA.
- Frequent round trips originating in boroughs other than the Paratransit customer's home borough.
- Customers needing wheelchairs using non-accessible stations, especially when unaccompanied by a PCA (as evidenced by no accompanying PCA-type swipe).
- Much higher usage of Zero-Fare card versus past Paratransit usage.
- Customers with incongruous usage patterns.

*MTA/Agency Response:*

*NYC Transit reported that "Paratransit now receives data from MetroCard Operations, and has begun to develop Zero-Fare MetroCard utilization reports [including] MetroCard activity by client, multiple MetroCard swipes, and 'high end' client utilization by county. These reports are being compared to Paratransit reports to identify simultaneous utilization of MetroCards and AAR service and to determine if MetroCard utilization is consistent with the client's AAR eligibility. The attributes referenced in this recommendation will ultimately be incorporated into the fraud detection program."*

3. Develop policies and procedures for deactivating, suspending, and terminating cards in connection with investigations and findings of fraudulent use.

*MTA/Agency Response:*

*Agreed.*

4. Give appropriate notice to customers that their Zero-Fare MetroCard usage is being monitored for fraud and that as warranted, after an opportunity to be heard, their card may be deactivated and their AAR privileges suspended or terminated.

*MTA/Agency Response:*

*Agreed.*

5. Issue non-activated Zero-Fare/Identification MetroCards to all customers, and only activate the free-fare function for those who request it.

*MTA/Agency Response:*

*“While we agree conceptually with this recommendation, NYC Transit MetroCard production does not include a mechanism to create MetroCards which can be issued and activated at a later date. Notwithstanding, Paratransit is continuing to evaluate the Zero-Fare MetroCard Program considering the [OIG’s] findings, and will develop complimentary controls.”*

*OIG Comment:*

*OIG will continue to monitor as appropriate the agency’s implementation of our recommendations and its efforts to develop fraud controls, particularly those efforts to reduce the risks presented by unsolicited but active Zero-Fare MetroCards.*

6. Deactivate unused Zero-Fare MetroCards already in circulation, after providing appropriate notice to customers.

*MTA/Agency Response:*

*“Paratransit will identify customers who have not utilized their Zero-Fare MetroCards for six months. These customers will be notified that their cards will be deactivated unless they provide a satisfactory explanation for their card to remain active.”*