



AUDIT AND ADVISORY SERVICES
SANTA BARBARA, CALIFORNIA 93106-5140
Tel: (805) 893-2829
Fax: (805) 893-5423

July 28, 2020

To: Jennifer Lofthus, Policy Coordinator and Deputy ADA Compliance & Privacy Officer
Administrative Services

Re: **Americans with Disabilities Act Compliance
Audit Report No. 08-20-0006**

We have completed an audit of Americans with Disabilities Act Compliance as part of the 2019-20 annual audit services plan. The audit was conducted in conformance with the *International Standards for the Professional Practice of Internal Auditing*. Enclosed is the report detailing the results of our work.

We sincerely appreciate the cooperation and assistance provided by Administrative Services, the Disabled Students Program, and the Testing Center during the review. If you have any questions, please contact me.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ashley Andersen".

Ashley Andersen
Director
Audit and Advisory Services

Enclosure

cc: Chancellor Henry Yang
David Marshall, Executive Vice Chancellor
Chuck Haines, Assistant Chancellor for Finance and Resource Management
Garry Mac Pherson, Vice Chancellor for Administrative Services
Margaret Klawunn, Vice Chancellor Student Affairs
UCSB Audit Committee
Alexander Bustamante, Senior Vice President and Chief Compliance and Audit Officer

This page intentionally left blank.

UC SANTA BARBARA

UCSB Audit and Advisory Services

Internal Audit Report

Americans with Disabilities Act Compliance

July 28, 2020

Performed by:

Antonio Mañas-Melendez, Associate Director
Gifty Mensah, Senior Auditor

Approved by:

Ashley Andersen, Audit Director

Report No. 08-20-0006

EXECUTIVE SUMMARY

OBJECTIVE

The primary purpose of this review was to assess the adequacy of internal controls implemented on campus to ensure compliance with relevant Americans with Disabilities Act (ADA) requirements and University of California (UC) and University of California Santa Barbara (UCSB) policies and procedures related to ADA.

The scope emphasized existing resources in place to ensure compliance with the policies and regulations applicable to students.

CONCLUSION

Based on the results of the work performed within the scope of the audit, we found opportunities for improvements in the following areas to ensure our compliance with the ADA.

- Documenting and updating policies and procedures
- Communicating emergency response guidelines/procedures
- ADA compliance assessments and surveys
- Documenting & tracking complaints and appeals
- Training and optimizing web accessibility
- Handling confidential documents
- Retention of documents

OBSERVATIONS, RECOMMENDATIONS, AND RESPONSES

1. GOVERNANCE AND ORGANISATIONAL STRUCTURES

OBSERVATIONS

a. Governance

We found that there is an initiative to improve the current communication and coordination between the Disabled Students Program (DSP) and the Testing Center to guarantee that neither loses visibility of what the other is doing or what needs to be accomplished.

As described in the background section, several departments are involved in the process of providing programs, services and activities to protect people with disabilities on campus. The Vice Chancellor of Administrative Services is the designated ADA Compliance Officer. His office has the responsibility of administering all aspects of campus-wide compliance with federal and state laws, as well as University policies and procedures pertaining to protections for all persons with disabilities and facilitating non-academic accommodations. DSP is the direct disability service provider making appropriate academic accommodations to students with disabilities. The Testing Center facilitates the space for test-taking exam accommodations. University Community Housing and Residential Services (UCHS) offers accommodations to students with disability-based housing needs.

Towards the end of our review, we were informed of a Memorandum of Understanding (MOU) that was being developed for a new system (RegisterBlast) that would become the primary scheduling system for exam accommodations. The usual DSP portal function for proctor requests will be deactivated and discontinued once the new system is fully implemented.

b. Policies, and Procedures

Relevant policies and procedures have been published in handbooks or manuals and are available on designated websites as required. No major changes have been identified during the last years. However, some critical policies should have been reviewed to determine if it is needed to be updated. DSP website is missing a link to the emergency response guidelines to facilitate students' access to this information. Students could miss the complete information because emergency response guidelines and procedures are found in several documents.

We selected critical policies and procedures such as *UCSB ADA Handbook* and emergency response procedures to determine whether these documents have been communicated to the campus community in ADA roles and have been updated. We noted the following:

- The *ADA Handbook* and *Emergency Assistance Program* manuals were dated in 2016 and 2009 respectively and have not been updated.
- DSP website did not have a link to the emergency response guidelines. Considering the criticality of this document, it could be expedient to include a link to this document on this website.
- We were informed that staff at residential facilities (UCHS) are aware of the emergency procedures to implement in event of an emergency; however, these procedures have not

been documented.

- Students could miss relevant information on emergency procedures because resources on emergency procedures are found in separate documents with different set of information. To ensure students obtain the complete guidelines on emergency response, it could be appropriate to consolidate all documents into a single document.

RECOMMENDATION

We recommend the Deputy ADA Compliance & Privacy Officer:

- Evaluate whether policies and procedures need to be updated.
- Work with the Disabled Students Program to ensure their website includes a link to critical policies.
- Work with University Community Housing and Residential Services to document the emergency procedures relevant to residential facilities.
- Evaluate the possibility of consolidating all emergency procedures and guidelines into one document.

MANAGEMENT RESPONSE

The Deputy ADA Compliance & Privacy Officer will:

- Evaluate whether mentioned policies and procedures need to be updated.
- Work with the Disabled Students Program to ensure their website includes a link to critical policies.
- Work with University Community Housing and Residential Services to document the emergency procedures relevant to residential facilities.
- Evaluate the possibility of consolidating all emergency procedures and guidelines into one document.

Audit and Advisory will follow up on the status of these issues by December 1, 2020.

2. COMPLIANCE AND MONITORING

OBSERVATION

a. Assessments and Evaluations

We evaluated whether the campus performs periodic assessments of the campus compliance to ADA standards and found that there has not been a recent assessment of the campus compliance with ADA requirements. Additionally, service providers (DSP, UCHS, and the Testing Center) do not always evaluate or obtain feedback on the services they provide to students with disabilities. Specifically,

- The last campus full¹ ADA self-assessment occurred in 1994 and a site accessibility assessment in 2006. We were informed that the lack of a recent assessment is due to resource constraints. The Deputy ADA Compliance & Privacy Officer has developed a checklist to help departments perform their evaluations to ensure compliance.
- Facilities Management has recorded several walkway maintenance achievements that may have resolved the non-compliant issues identified in the 2006 *Site Accessibility Conditions Survey* report. However, the action plan to resolve issues identified in the report was not documented to allow accountability and there is no guarantee that all issues have been resolved.
- DSP and the Testing Center do not administer any form of surveys at the end of their services to obtain feedback and evaluate the services they provide to students. UCHS administers general surveys. However, the survey is not specifically designed to obtain feedback on the accommodations provided to students with disabilities.

b. Tracking of Complaints and Appeals

During the review, we found that there are procedures for filing both official and unofficial complaints described in the *ADA Handbook* and on designated websites. However, unofficial complaints are not well documented and tracked. We were informed that:

- DSP received complaints via the phone or in-person, but they were not documented and tracked.
- UCHS received complaints and very few appeal cases on residential request denials, but these complaints and appeals were not documented and tracked.

c. Website Accessibility

Campus has *Web Standard Guide*² and uses the UC automated tool (*Siteimprove*) to score a website's accessibility. However, not all websites are fully aligned with these guidelines and web accessibility training has not been formalized.

During the review, we assessed whether critical campus websites are compliant with the *UCSB Web Standard guide* and whether critical departments have been trained on the guidelines to ensure users with disabilities could orient themselves within the structure of the departments' websites. Specifically,

- We obtained the *Siteimprove* report for a sample of websites (DSP, Office of Admissions, and UCSB Library) and found that none of the websites achieved a 100% score.
 - DSP website score was 94.3% with areas of improvement such as "*Element not highlighted on focus; Headings not nested properly*³; *color contrast is insufficient*".

¹ Full – Includes accessibility and academic accommodation requirements.

² UCSB Web Standard Guide – provides recommendations addressing accessibility in websites.

³ Headings not nested properly - Heading level and visual appearance (e.g. size, boldness) or presentation do not properly align - users do extra work to find what they are looking for.

- Office of Admission had a score of 77.6% and some areas of improvement such as *“No headings on page; Element ID is not unique; Language page has not been set.”*
- UCSB Library scored 65.5% and areas of improvement such as *“Local link destination does not exist; Heading is missing text, color contrast insufficient”*.
- We selected three general web accessibility guidelines from the *UCSB Web Standard Guide*, (*“Page should be navigable by mouse, keyboard, etc; Use the CSS⁴ Speech properties to control how text on a web page is read via assistive technologies⁵, and; Provide ample time for the user to engage with the content if website must include time-sensitive⁶ content changes”*), and manually tested these requirements on the sampled websites. We found that,
 - All the websites were completely navigable by mouse.
 - Office of Admissions and University Library websites were optimized for keyboard-only⁷ functionality. We could access menus, links, and content with just the keyboard without using the mouse. However, the use of the "tab Key" on DSP website does not pre-highlight to help navigate through corresponding links, but other keys could navigate without exception.

The effective use of CSS speech properties to control how a document or web page is read through assistive technologies is to optimize for keyboard-only functionality to help control the volume, voice, speed, pitch, cues, pauses, etc.

- We did not identify any time-sensitive content on any of the websites accessed.
- We confirmed whether critical departments have been trained on web guidelines to ensure the campus websites are compliant to web standards and are easily accessible to individuals with disabilities. We found that the campus organized a Siteimprove workshop in November 2019. However, this training was not formalized to include the target audience and the frequency is unknown.

RECOMMENDATION

We recommend the Deputy ADA Compliance & Privacy Officer to:

- Evaluate alternatives to perform periodic assessments of the campus compliance to ADA including the possibility that each department has to conduct its self-assessment.
- Work with departments in ADA roles to implement surveys at the end of their services.

⁴ CSS (Cascading Style Sheets) is a language that describes the rendering of markup documents on various supports.

⁵ Assistive Technologies - Technology for people with disabilities to help them perform difficult tasks

⁶ Time sensitive - People with cognitive or visual disabilities are unable to read moving text quickly enough.

⁷ Keyboard-only – ability to navigate the website using only the keyboard (without using the mouse).

- Work with the Disabled Students Program, University Community Housing and Residential Services, and the Testing Center to document and track complaints and appeals received outside of the official channel.
- Work with the Web Standard Committee and departments with critical website to set up a training plan to ensure their owners have the proper training and implement measures to ensure campus websites are easily accessible to people with disabilities.

MANAGEMENT RESPONSE

Deputy ADA Compliance & Privacy Officer will:

- Evaluate alternatives to perform periodic assessments of the campus compliance to ADA including the possibility that each department has to conduct its self-assessment.
- Work with departments in ADA roles to implement surveys at the end of their services.
- Work with the Disabled Students Program, University Community Housing and Residential Services, and the Testing Center to document and track complaints and appeals received outside of the official channel.
- Work with the Web Standard Committee and departments with critical website to set up a training plan to ensure their owners have the proper training and implement measures to ensure campus websites are easily accessible to people with disabilities.

Audit and Advisory will follow up on the status of these issues by December 1, 2020.

3. SERVICES

OBSERVATION

a. Exam Accommodation Requests

We found that exam accommodations were provided within a reasonable time⁸. Despite that students usually do not make the requests on time as required, the department makes every effort to provide the accommodation. Some late requests caused the department to incur emergency hire rates to fulfill three of the requests in our sample.

We identified 11,830 exam accommodation requests for the review period and 65, representing less than 1%, were not provided. The department confirmed that these were due to late submission of requests that did not give the department enough time to make the necessary arrangements.

We randomly sampled 15 exam accommodations requests for the period fall 2017 to winter 2020 and determined whether the requests were provided considering the date of the request to the date of the exam and found:

- 14 requests were provided even though 10 of them were made less than 10 days

⁸ The department requires students to request accommodations at least 10 days before the start of the exam to allow the department to make the necessary arrangement.

before the exam. Two out of the 10 were made two days before the exam and one was made on the day of the exam.

- One request was not provided but was justified by the department. The request was made two days before the exam, and there were only a few proctors available due to end of the quarter.

b. Residential (Housing) Accommodations

Application review process

We found adequate controls in the ADA housing accommodation process. However, the department receives students' Diagnosing Professional Form through email, and about 12 staff in the department have access to this email account.

The Diagnosing Professional Form includes details of students' health information provided by their licensed professionals about the student's disability. We do not consider email as a safe channel to transmit such information due to encryption and the number of staff with access to this document is large. There is the need for the department to evaluate the best alternative to receive confidential documents and to limit access to this document based on job roles.

Accommodation charges

During the review, we confirmed whether students with approved housing accommodations have been accommodated without extra charges as required and found no exceptions. However, we found opportunities to improve the documentation and retention of documents.

We sampled 15 students with approved accommodations and compared their bills to the approved billing rates obtained from the department. We found:

- ADA accommodations rates were slightly lower than the regular rates on the billing charts. The billing chart provides the type of room and their respective rates for both regular and ADA accommodations.
- In all cases, the students were charged the ADA rate or the regular rate based on the approved accommodation. It is required that ADA students should not be charged more than what they would have paid without having a disability.
- The department did not retain students' accommodation request forms to support the approved requests for the period 2017-2020 due to destruction.

Requests Denials

During the testing, we selected five samples of denied residential accommodation requests and obtained the documentation and reasons for the denial. In all cases, the denials were justified by the department. However, support documents for three of the sample were not available for review due to destruction.

RECOMMENDATION

We recommend University Community Housing and Residential Services should:

- Evaluate the best alternative to receive confidential documents and access to these documents by staff should be on a need to know basis.
- Consider implementing the appropriate retention period, as well as HIPAA compliance.

MANAGEMENT RESPONSE

University Community Housing and Residential Services will:

- Evaluate the best alternative to receive confidential documents and access to these documents by staff.
- Consider implementing the appropriate retention period, as well as HIPAA compliance.

Audit and Advisory will follow up on the status of these issues by September 30, 2020.

GENERAL INFORMATION

BACKGROUND

The Americans with Disabilities Act⁹

The Americans with Disabilities Act (ADA) became law in 1990. The ADA is a civil rights law that prohibits discrimination against individuals with disabilities in all areas of public life, including jobs, schools, transportation, and all public and private places that are open to the general public. The purpose of the law is to make sure that people with disabilities have the same rights and opportunities as everyone else. The ADA gives civil rights protections to individuals with disabilities similar to those provided to individuals based on race, color, sex, national origin, age, and religion. It guarantees equal opportunity for individuals with disabilities in public accommodations, employment, transportation, state and local government services, and telecommunications.

The ADA is divided into five titles (or sections) that relate to different areas of public life. The Title II of the ADA explains the public programs, services and activities that protect people with disabilities in places such as schools, parks, fire station, stadiums, and sidewalks. In 2008, the Americans with Disabilities Act Amendments Act (ADAAA) was signed into law and became effective on January 1, 2009.

UCSB Disability Program¹⁰

UCSB Administrative Services is the designated ADA Compliance Office that administers all aspects of campus-wide compliance with federal and state laws, as well as University policies and procedures pertaining to protections for persons with disabilities. It is also responsible for

⁹ Americans with Disability Act website.

¹⁰ UCSB Disabled Student's website.

all non-academic accommodations on campus. Disabled Students Program (DSP) receives guidance as one of the direct disability service providers for students on campus to facilitate making appropriate academic accommodations to students with disabilities. University Community Housing and Residential Services (UCHS) offers accommodations to students with a disability-based housing need. The Testing Center facilitate the space for test-taking exam accommodations to students with disabilities.

Each year temporarily and permanently disabled students attend classes at UCSB. Students with disabilities can be assured of receiving the same core support academic services offered throughout the UC’s system-wide chain of campuses.

DSP serves as the campus liaison regarding issues and regulations related to students with disabilities. The DSP staff works in an advisory capacity with a variety of campus departments to ensure that equal access is provided to all disabled students. The focus of the DSP’s mission is to ensure full participation and equal access to all educational activities and classes at UCSB and to facilitate student success for students with disabilities. Providing academic accommodations to students with disabilities is a shared responsibility of the campus.

Students with disabilities are responsible for ensuring that the DSP is aware of their disabilities and for providing DSP with appropriate documentation. Students utilize the respective form to verify their disability. It requires written verification from students’ treating clinicians (such as a medical doctor, psychologist, psychiatrist, licensed educational psychologist, etc.). Documentation from treating physician establish eligibility for services. For students with a temporary disability, DSP also requires detailed documentation from the treating physician (written on the physician’s stationery) of the temporary disability, including a specific diagnosis, the expected duration and the limitations imposed by the condition described. Once documentation is received, a Disabilities Specialist will review Information submitted pertaining to the student’s condition and students will be contacted regarding status.

Table 1 shows the population of DSP for the last five years. The program saw a 20% increase over the years. Overall, 8% of the student population requires DSP services. Whereas this is below national average of about 11%, the department foresees this number growing.

Table 1		DSP Census	
		Year	Population
		2015-2016	1,244
		2016-2017	1,404
		2017-2018	1,672
		2018-2019	1,864
		2019-2020	**2,012

Source: Gary White, Director of DSP.

** Population could reduce due to COVID 19 impact as some students may have left the university.

DSP core funding comes from students Affairs and student fees. Every two years students reaffirm their support for the department’s operations through a fee.

Table 2 compares DSP service costs with operational funds for the 3 years ending 2019. Eliminating CART¹¹ cost for fair comparison, service costs increased by 30% while total operational funds increased by 23% over the three-year period. Even though not a significant difference, we could say that increase in operational fund is not consistent with increase in service cost.

Type of Cost	Year (\$)		
	2016-2017	2017-2018	2018-2019
	Proctoring costs	123,018	148,487
Note taking costs	162,809	188,816	186,259
Interpreting costs	2,271	1,345	2,303
CART costs	N/A	4,735	6,896
Total Cost	288,099¹²	343,383	382,518
Total Operational Funds	1,128,261	1,250,509	1,390,628

Source: Gary White, Director- DSP & Auditor Analysis.

Academic Accommodation Program⁵

Academic accommodation Services offered includes:

- Reading Services:
 - E-Text: Scanned, and digitized text.
 - Kurzweil: Kurzweil text recognition software allows students to listen to and read scanned text, image text, digital files, and internet pages.
 - ATC Braille: Conversion of written materials for blind students.
- Note Taking Services
 - Sonocent: Sonocent recorder is an Android and iOS app that allows students to capture high-quality audio recordings and, in real-time annotate, with colors, photos and text notes.
 - Smart Pen: A ballpoint pen with an embedded computer and digital audio recorder.
 - Note takers: Peer students in the student’s classes that take notes and upload them into the DSP portal system.
- Test Taking Accommodations includes
 - Extended time (150% or 200%) of original exam
 - Private and alternate exam setting
 - Exam writer - A DSP proctor who will write content dictated by DSP student
 - 4 function calculator- DSP issues calculator for exams with use of the following functions

¹¹ CART - Communication Access Real-time Translation. Automatic tool that provide real-time captioning/translation.

¹² Total Cost does not include CART cost for 2016-2017, which was not available at the time of the review.

- Deaf & Hard Hearing
 - CART services at UCSB may be provided by a CART captioner located in the classroom or by one who is accessing the course remotely and is located offsite.
 - Interpreting Services - American Sign Language Interpreters (ASL) services at UCSB may be provided by an interpreter located in the classroom.
 - Assistive Listening Devices - DSP has two types of devices depending on class size. The amplifiers bring sound directly into the ear. They separate the sounds, particularly speech, that a person wants to hear from background noise.

Table 3 shows accommodations that were provided by the department. Numbers saw consistent increase over the period except F 2018 and W 2020 for notetaking and exam respectively. The department has about 642 proctors that help provide proctored exams.

Table 3 Accommodations by Numbers		
Quarter	Total Exam Accommodation Provided	Total Notetaking Accommodation Provided
F 2017	905	585
W 2018	1,377	632
S 2018	1,474	628
F 2018	1,526	535
W2019	1,646	662
S 2019	1,653	613
F 2019	1,632	695
W 2020	**1,552	715
Total:	11,765	5,065

Source: Gary White, Director- DSP & Auditor Analysis.

** Number could reduce because some exams were not conducted before the closure of the school due to COVID 19.

Non-Academic Accommodation Program

Accessibility Resources¹³

The University is committed to creating an environment where people with disabilities have equal opportunity to enjoy campus programs, activities, and benefits. The University prohibits unlawful discrimination on the basis of disability in its programs, services, and activities. The ADA Compliance Office for UCSB supports the campus community in meeting its responsibilities with respect to persons with disabilities under Americans with Disabilities Act (ADA), federal and state law, and the UC guidelines applying to nondiscrimination on the basis of disability.

Budget allocation is a share committee model that includes faculty, staff and students that make the recommendations on the projects to fund. A committee votes on ADA request projects. Departments fund staff accommodations. There is no centralized account for ADA for budget allocation.

¹³ UCSB Administrative Services website.

Campus Access

The Advisory Committee on Campus Access (ACCA) advises the administration on all matters related to access to campus programs, services, and activities by persons with disabilities. All vehicles parked on campus must display a valid campus permit. An ADA (Disabled) placard issued by the Department of Motor Vehicles is not a substitute for a campus permit. The placard, however, entitles you to park in spaces not otherwise available to campus visitors, staff, or students. UCSB is in an unprecedented era of construction and campus renewal.

Reporting a Barrier

The University seeks to maintain an accessible “path of travel” between and around the public areas of campus. The campus community or any visitor may contact the ADA Compliance Office to report architectural or structural barriers on campus. The office coordinates, where achievable, with campus Design & Facilities.

Resolving Conflicts

The campus strongly encourages informal resolution as a first step prior to filing a formal complaint. People with disabilities who feel their needs related to access and/or accommodations are not being addressed are encouraged to contact ADA Compliance office for assistance in resolving their concerns.

Emergency Preparedness

UCSB Emergency Services has created the Emergency Assistance Program to provide an opportunity for faculty, staff, and students to create an emergency response action plan, identify a support team for special evacuation situations, and to enroll in an automated emergency notification and response system. Detailed procedures for evacuation of persons with a disability during emergencies when an elevator is not available have been developed to handle situations in multistory buildings for those unable to use the stairs.

Residential or Housing Services¹⁴

The Special Housing Accommodations committee reviews requests from students with a disability-based housing need. Students with disability seeking accommodation in university housing contact the UCHS via phone or email to request access to the Special Housing Accommodations process. The student receives an acknowledgment email with a link to complete the Specific Accommodation Request and Information Release Form. The request for special housing accommodations is supplemental to the university housing contract. Students have their clinician complete the Diagnosing Professional Form, which is emailed to them after they complete the Specific Accommodation and Information Release Form. A certified, licensed professional that is not a relative of the applicant must complete the Diagnosing Professional Form.

Once the Diagnosing Professional Form is completed and received, the request is reviewed and approved by the Special Housing Accommodations Committee that meets monthly. Students are notified about the status of their request. The committee only recommends accommodations based on a documented, medical need; housing preferences are handled by UCHS. If the request is denied, the student is communicated in person of the decision.

¹⁴ University & Community Housing Services website.

Usually, denials are due to lack of support documentation for the individual's request. The student can appeal a decision.

Currently, there are 466 students with housing accommodations. The cost of accommodation is equivalent to what the student would pay if they did not have a disability.

SCOPE

The scope of the review was limited to existing UC and UCSB policies related to the Americans with Disabilities Act as well as relevant governmental regulations. The scope also included the existing resources in place to ensure compliance with the policies and regulations applicable to students. Specifically, we:

- Selected a sample of critical policies, procedures, or guidelines covering critical ADA areas and determined whether these documents have been communicated to the campus community in ADA roles and are updated.
- Evaluated whether the frequency of the ADA assessment is adequate.
- Obtained a sample of exam accommodations and confirmed if the accommodations were provided in a reasonable time.
- Inquired about the process of UCSB Housing, Dining & Auxiliary Enterprises to accommodate DSP students and determined compliance to the university policy.
- Selected a sample of students with a disability who are housed at the university residence and determined whether they have been accommodated without extra charges.
- Selected a sample of denied requests for residential services, obtained the reasons for the denial and determine if the reasons were appropriate.
- Selected a sample of campus websites and determined whether they are ADA web accessibility compliant.
- Obtained the statistics of budget and ADA accommodation numbers for the review period.

CRITERIA

Our audit was based upon standards as set forth in the UC and UCSB policies, best practices, and other guidance relevant to the scope of the audit. This audit was conducted in conformance with the *International Standards for the Professional Practice of Internal Auditing*.

This review emphasized, but was not limited to, compliance with:

- *UCSB ADA Handbook*
- *ADA National Network Disability Law Handbook*
- *ADA Standards 2010*
- *UCSB Web Standards Guide*

AUDIT TEAM

Ashley Andersen, Audit Director
Antonio Mañas-Melendez, Associate Director
Gifty Mensah, Senior Auditor