

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

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**Los Angeles County  
Sheriff's Department  
Contract Audit Report**

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**Revised Report**

**Includes Updated Metro Response to Report Recommendations**

**Report No. 14-AUD-07**

**June 30, 2014**





**Metro**

**Los Angeles County  
Metropolitan Transportation Authority**

Office of the Inspector General  
818 West 7<sup>th</sup> Street, Suite 500  
Los Angeles, CA 90017

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June 3, 2014

Metro Board Members

Re: Report on Los Angeles Sheriff's Department Contract Audit (14-AUD-08)

Dear Metro Board Members:

The Metro Board directed the Office of the Inspector General to audit the transit policing contract between the Los Angeles County Sheriff's Department (LASD) and Metro. The OIG prepared a comprehensive scope of work for the Request for Proposal to obtain an expert consultant to perform this audit. Bazilio Cobb Associates (BCA) was hired to perform the audit. The audit team included internationally recognized policing experts with policing experience from London, New York, Boston, Los Angeles and Pasadena, provided by the Bratton Group, LLC, a subcontractor of BCA.

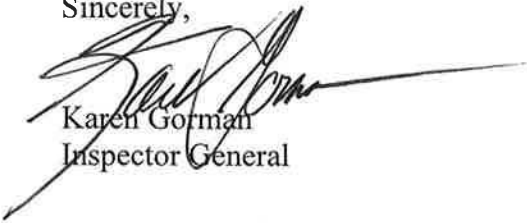
The attached report contains a number of recommendations to increase transit policing efficiency and effectiveness in the following areas:

- Transit Community Policing
- Requirements for Bus Operations
- Requirements for Rail Operations
- Communications
- Management, Oversight, and Performance Metrics
- Reports and Analyses
- Complaints
- Security Organization and Responsibilities
- Personnel and Billing
- Independent Audits and Reviews

A draft report was provided to LASD and Metro on April 2, 2014. Both LASD and Metro management agreed with the majority of the findings and recommendations in the report and indicated that the recommendations will be evaluated and corrective actions will be initiated where appropriate.

We appreciate the opportunity that the Metro Board has given us to work on this project. I will be available to answer any questions that the Board Directors may have concerning this report.

Sincerely,



Karen Gorman  
Inspector General



**Metro Office of the Inspector General**

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## **Los Angeles County Sheriff's Department**

### **Contract Audit Report**

**May 2014**

**BCA** Bazilio Cobb Associates

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May 27, 2014

Ms. Karen Gorman, Inspector General  
Los Angeles County Metropolitan Transportation Authority  
818 West 7th Street, Suite 500  
Los Angeles, California 90017

Dear Ms. Gorman:

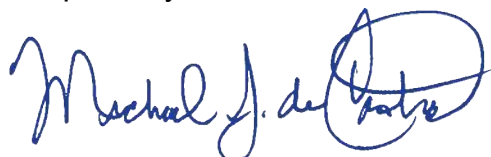
Bazilio Cobb Associates (BCA) is pleased to provide the attached contract performance and compliance audit report on the Los Angeles County Sheriff Department's (LASD) contract with the Los Angeles County Metropolitan Transportation Authority (Metro) to provide transit safety and security services for Metro's bus and rail lines.

This report details the findings of an audit of the five-year transit policing Memorandum of Understanding (MOU) covering the period July 1, 2009 through June 30, 2014 between Metro and the LASD. The audit team included nationally recognized transit policing experts from The Bratton Group, LLC, a subcontractor to BCA.

BCA began its audit in September 2013, and completed fieldwork in February 2014. A draft report was submitted to Metro in March 2014, and finalized in May 2014.

If you should have any comments or questions, please feel free to contact me anytime at (310) 792-4640 x110 or email me at [mdecastro@baziliocobb.com](mailto:mdecastro@baziliocobb.com).

Respectfully,

A handwritten signature in blue ink, reading "Michael J. de Castro". The signature is stylized with a large, circular flourish at the end.

Michael J. de Castro  
Principal



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# **1. Executive Summary**

## **Background**

This report details the findings of an audit of the five-year transit policing contract between the Los Angeles County Metropolitan Transportation Authority (Metro) and the Los Angeles County Sheriff's Department (LASD) directed by the Metro Board. The audit team included nationally recognized transit policing experts from The Bratton Group, LLC, a subcontractor to Bazilio Cobb Associates.

This report recognizes that the challenges inherent in providing the services called for in the LASD-Metro contract and Scope of Work to an area as large as Los Angeles County have contributed to some of the deficiencies detailed herein; however, LASD needs to develop effective strategies to meet the challenges of providing policing services to a large and geographically diffuse transit environment. Effectively policing the Metro transit system requires creative and concerted strategies, ones that should be codified in comprehensive plans and directives.

Under the contract, the LASD is required to submit a Transit Community Policing Plan annually, but no such plan has been submitted. This requirement has created some confusion by suggesting that all operational strategies be detailed in the Transit Community Policing Plan. While transit community policing is an important orientation for the police agency, other essential operations, such as those that would provide faster responses to calls from service emanating from buses or provide greater focused accountability and more robust performance, need to be addressed in separate operational strategies for the bus and rail systems, not in a single community policing plan that should be focused on building relationships of trust between police and the communities through which transit passes and with users of the transit system. Policing strategies can reflect the commitments and values in a Community Policing Plan but need to be separate documents.

Successfully realizing the goals set forth in the contract also requires cooperation and coordination among Metro operators, security, management, and the LASD Transit Services Bureau (TSB), as well as with the local jurisdictions through which the Metro rail lines and buses pass. The Transit Community Policing project is unique, and will require the support of riders and the communities through which the transit system runs to bring it to fruition. Additionally, the substantial size of the Metro operating area and the limited resources of the TSB do not permit the LASD to provide comprehensive law enforcement and emergency police response services to the entire transit system. LASD and Metro must better coordinate and seek cooperation with local jurisdictional law enforcement agencies to provide police response to emergency calls for service emanating from rail and bus lines and stations. This will enable faster response times to emergency calls on the transit system and permit the TSB to focus on problem solving and preventive policing.

Problem solving is crucial to improving public safety on the transit system, and it should be the primary mission of the TSB. Problem solving requires several elements, which



are detailed in the recommendations of this report. First, the LASD must commit itself to *preventive policing*, making a concerted effort to stop crime before it happens. Most critically in this effort, the LASD must create a campaign to target “quality of life” crimes such as vandalism and fare evasion, which create an atmosphere of fear and disorder and allow more serious crime to flourish.

Second, the LASD must work with Metro to create a *service-oriented* and *felt presence* throughout the transit system. If transit customers do not feel that law enforcement serves their interests and those of the general public, and if those customers do not feel that law enforcement's presence on the transit system is effectual, they will not be willing to cooperate with LASD or Metro to help enforce the rule of law on the transit system (e.g. calling-in tips) or assist in the development of policing plans or strategies. Without this public input, LASD and Metro will be unable to formulate policing strategies and actions that are conscious of the problems that exist on the transit system, and unable to craft strategies which the public views with legitimacy and is willing to help execute. Public cooperation is essential toward achieving the aims of the LASD-Metro contract as well as improving public safety on the Metro transit system generally; thus, LASD and Metro must make every effort to ensure that it operates in cooperation with the transit-riding public.

## **Scope and Methodology**

The areas covered by this report include transit community policing, requirements for bus and rail operations, communications, management oversight and performance metrics, reports and analyses, complaints, security organization and responsibilities, personnel and billing, and review of previous independent audits and assessments. The methodology and approach used in each of these areas is described in the body of the report.

## **Review Results**

Over the last year the LASD has improved the impact of policing activities throughout the transit system. More citations have been written, the number of checks on whether riders have paid their fares have increased (although not to the level desired by Metro), officer morale has generally increased and plans to address staffing issues and other improvements – many mentioned in this report – have been underway.

## **Transit Community Policing**

Metro's Scope of Work for the LASD-Metro contract states that LASD is to provide “transit community policing services” for all Metro service lines (including bus lines) and stations. The Scope of Work also stipulates specific characteristics and expectations for the transit community policing services, including requirements related to personnel, operations, and services provided. It is often assumed presently that transit community policing includes rail and bus strategy, but these need to be separated.

One requirement stipulated by the Scope of Work is that the LASD is to prepare and submit an annual Transit Community Policing Plan designed to “successfully implement the best and most innovative Transit Community Policing Program in the nation.” As of



the audit period, the LASD has not submitted such a plan. We also sought to determine whether CompStat<sup>1</sup> or similar processes are adopted and followed in order to provide effective police management and deployment.

We found that the lack of a Transit Community Policing Plan has led or contributed to deficiencies in TSB operating areas by not providing strategic focus on the unique challenges of community policing in a transit environment. A transit system, unlike a municipality, contains a geographically dispersed and transient population, and considerable ingenuity and planning are required to adapt the community policing model from municipalities to a transit system. To provide for ingenuity and centralized planning, we recommend LASD create a Transit Community Policing Plan that provides for the application of community policing principles to the transit environment, including patrolling to provide a “felt presence,” community partnerships, crime prevention through a focus on quality of life issues, service-orientation, and problem solving.

We also found that the transit community policing services lack focused accountability, expertise, and general quality in their execution. The TSB is perceived by some to have lesser prestige than other LASD assignments, and many in LASD consider assignment to TSB to be undesirable, which indirectly affects areas of performance. Additionally, filling TSB positions via the Cadre of Administrative Relief Personnel (CARP) program results in a lack of expertise in transit operations at the line level. There are perceptions within LASD that TSB assignments do not require specialized skills and expertise; rather, TSB assignment is often viewed as a punishment or an easy source of overtime hours. This perception impacts the transit community policing project, which, like all community policing projects, requires personnel buy-in and specialized interpersonal skills among line personnel and creative and sensitive leadership from supervisors.

Additionally, the Intelligence-Led Policing (ILP) program, TSB's version of CompStat, enables the dissemination of useful information; however, it does not provide for focused accountability as the ILP process neglects to draw strategic conclusions from the information presented and does not act as a forum for addressing challenges proactively. We provide recommendations for restructuring the ILP to provide a true system for accountability.

### **Requirements for Bus Operations**

Metro's Scope of Work for the LASD-Metro contract states that LASD is to provide specific services related to bus operations. We sought to determine whether there is a strategy that is meeting reasonable goals for bus operations, including ensuring the safety of customers, operators, employees, revenues, and assets. We also sought to

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<sup>1</sup> First introduced by Commissioner William Bratton at the New York Police Department in 1994, “The CompStat model is a management process within a performance management framework that synthesizes analysis of crime and disorder data, strategic problem solving, and a clear accountability structure.” (“Implementing and Instituting CompStat in Maryland,” Institute for Governmental Service and Research, University of Maryland, <http://www.compstat.umd.edu/>)





determine whether the LASD's current bus strategy is meeting the general goal of providing for maximum security on the buses.

The LASD has not developed an annual bus operations policing plan or strategy; thus, the TSB has no central plan to address the challenges and operational necessities of crime and disorder on buses. Most critical among these challenges is the generally limited staffing available for proactive policing on and responding to calls for service emanating from buses and bus stops. There is a subsequent need to work with local jurisdictions to provide a response from local agencies to emergency calls for service. We recommend the TSB reorganize its patrol boundaries into smaller units to provide focused accountability across the entire bus system. We also recommend a reorganized transit policing structure that will also assist in providing this focused accountability in the new geographic areas.

### **Requirements for Rail Operations**

Like bus operations, Metro's Scope of Work for the LASD-Metro contract states that LASD is to provide specific operational requirements related to rail operations. In assessing operational and contractual requirements related to rail operations, we sought to determine whether there is a rail security strategy that is meeting reasonable goals for rail operations, including ensuring the safety of customers, operators, employees, revenues, and assets. We also sought to determine whether the LASD's current rail strategy is meeting the general goal of providing for maximum security on Metro trains and stations, including Union Station.

As noted in the prior section, there is no transit community policing plan for any aspect of transit policing, and there is also no specific plan or strategy relating to rail operations. We recommend LASD formulate a rail policing strategy in order to strategically implement community policing-related objectives as well as those directly related to fare enforcement and disorder in stations, issues for which Metro has requested LASD action.

We found that much of the disorder in stations relates to panhandling, disorderly conduct, and other issues in stations that unsettle the public. Problems involving panhandling, vandalism, and other sources of disorder will require a concerted quality of life campaign organized around "Broken Windows" principles,<sup>2</sup> set forth in an organized strategy. Metro has also made a specific request pertaining to fare enforcement (that TSB Deputies assigned to patrol conduct 80 fare checks per day), which is in need of further review as to the responsibilities of involved agencies, and how to target areas where significant non-compliance is suspected. We recommend LASD outline actions to systematically address quality of life problems and review fare enforcement procedures.

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<sup>2</sup> "Broken Windows" is a criminological theory of the norm-setting and signaling effect of urban disorder and vandalism on additional crime and anti-social behavior. The theory states that maintaining and monitoring urban environments in a well-ordered condition may stop further vandalism and escalation into more serious crime.



We also found that Metro could benefit greatly from proximity patrolling in rail operations. In addition to increasing the robustness of police presence by providing “felt presence” and other types of training, proximity patrolling – sending patrolling deputies in pairs in close proximity to each other but not next to each other – creates an impression of increased police presence and multiplies police agencies’ ability to carry out community policing and other proactive work. We recommend the adoption of proximity patrolling and that special training be provided.

### **Communications**

Metro’s Scope of Work requires a Police Radio Dispatch and Communications Capability that minimizes response times for calls for service. In assessing communications capabilities, we reviewed available documentation for systems operated by LASD and between LASD and the transit operations; response times for calls for service; call receipt, handling, transfer times, and dispatch times; met with numerous individuals who interface with the communications system; and compared our findings with national best practices.

We found that LASD’s reported response times generally met targeted goals; however, the data provided did not provide an accurate picture of actual response times. This is because the reported response times do not consider the time from when a call is made and actually received by LASD to the time when a Deputy has actually arrived on scene. Reconfiguring the response time reporting in this way would provide a more accurate and complete view of how well LASD is meeting its response time goals.

Additionally, we found that the Monthly Reports could provide a better month-to-month analysis of improvements. Improvements to the manner in which LASD records and analyzes response times could help the Department to greatly improve deployment practices by identifying “hotspots” and other actions that could be enabled through better intelligence-led policing. Such a process could, in turn, significantly reduce response times.

As noted previously, LASD’s ability to transfer calls for service to local police agencies will be crucial in meeting response time goals; however, TSB currently does not have standard procedures in place to do so. Future discussions with local police agencies must include coordination of communications systems to ensure that TSB operators can transfer calls efficiently as well as training for TSB operators on how to transfer the calls and which calls to transfer.

Future training should also include general training for call-takers and dispatchers, as we found that they currently receive inconsistent and no formal training relating to transit operations. At present, there is only informal, in-house training in addition to the standard LASD dispatcher training, which is more geared toward traditional county law enforcement rather than a transit system. We recommend that a minimum six-month tour of duty should be mandatory for all personnel assigned to transit communications, and that a policy manual should be developed for the TSB Communications Unit in addition to special training.



## **Management Oversight and Performance Metrics**

Contract performance oversight is essential to ensure the services contracted for are provided, the quality of service is as defined, and the required outcomes or deliverables are being provided. The contract between Metro and LASD is complex, with numerous requirements, expectations and deliverables. It is also for a core service to Metro – providing a safe and secure transit system.

We found that Metro needs to substantially strengthen and enhance its oversight of LASD contract performance. Metro has not developed a formal plan or methodology for contract oversight, and no staff are dedicated to contract oversight. We recommend Metro develop a comprehensive contract oversight plan and methodology and develop a staffing plan for implementing the oversight plan.

Performance metrics were developed and included in the contract extensions beginning in FY 2012. These metrics focused on transit safety and security, the public's perceptions of safety and security, managing budgetary resources, and Metro's perception of service. Each of these metrics also included targets to be met.

We found LASD had not met many of the targets for performance metrics, including crime reduction, continuity of staff, and fare enforcement saturation and activity rates. We also found the performance metrics used could be expanded and enhanced, and have provided a list of recommended potential performance indicators. We recommend Metro and LASD use this list to develop and adopt a comprehensive set of performance indicators and periodically measure and report results to both Metro Executives and the Board.

We also found that two key performance indicators – crime and response time to incidents, were not being appropriately reported to Metro by LASD. Crime on the Metro system is underreported by not conforming with Uniform Crime Reporting (UCR) standards, nor including crimes responded to and handled by other law enforcement agencies.

The current contract does not include provisions for either penalties or incentives based on actual performance. We recommend Metro identify specific elements of the contract that are essential and define specific penalties to be imposed if LASD does not adequately provide those elements.

## **Reports and Analyses**

The efficient exchange of information between Metro and LASD is essential to ensure services are provided in an effective, coordinated, and meaningful way. We found good coordination between Bus Operations Control (BOC) and the LASD; with LASD personnel physically assigned in the BOC they are able to directly communicate with bus operators and LASD personnel in the field. We recommend this practice continue to help provide quick response to public safety incidents on buses.

Communication and coordination between the rail operations (ROC) and LASD is not as effective, and is indirect through the telephone resulting in potential loss of critical information and delays in response. We recommend Metro and LASD work together to



co-locate LASD personnel within rail operations with the capability to communicate directly with both rail operations and LASD field personnel consistent with the approach used for bus operations.

The Metro transit system is well covered by video cameras with recording capabilities. We found LASD personnel are provided reasonable access to video information to support their law enforcement and investigative needs. We recommend Metro and LASD continue to work together to improve the coverage of the Metro system with video and further expedite the process for retrieval of requested video recordings.

With the implementation of TAP, LASD personnel began using a mobile phone validator to verify fares. The current mobile phone validator is inadequate and has limited functionality. The TAP Program staff are currently designing and acquiring a new mobile phone validator using a smart phone platform. This platform provides substantial potential for development of additional capabilities and applications, including citation issuance and tracking, checking for wants and warrants, and providing critical information. We recommend the TAP Program, Metro Safety and Security, and LASD work together to develop new applications and capabilities for the new mobile phone validator.

Since the Metro transit system is considered high-risk critical infrastructure, it is essential that LASD is adequately prepared to provide a tactical response in the event of any type of critical incident. Having accurate and up to date information on the layout of Metro facilities is essential to planning and executing an effective tactical response. We found LASD personnel do not have adequate access to information on the layout of Metro facilities to facilitate such an effective response. We recommend Metro and LASD work together to identify the specific needs and requirements for such information, and provide this information in an electronic format that is up to date and easily accessible.

## **Complaints**

Metro customers that are dissatisfied with their treatment or interaction with LASD personnel, or the service provided, can make a formal complaint, or service comment. They can also make formal commendations for the service they receive from LASD. Both State law and LASD policy require investigations of complaints, including a formal conclusion or disposition of each complaint.

We reviewed the approach used to investigate and reach conclusions for personnel complaints, and found that LASD's approach is not consistent with industry best practices. The disposition categories used by the LASD do not adequately result in a conclusion of fact regarding the specific allegations made in the complaint. We recommend LASD consider revising its approach to investigating including specific conclusions of fact using the four standard categories of exonerated, unfounded, not sustained, or sustained.

We also found that timelines established by LASD policy for sending acknowledgement and outcome letters are not met for most complaints. Acknowledgement letters were sent within the required 3 day time period in only 38% of the cases. Final outcome



letters were sent within the required 30 day time period in only 20% of the cases. We recommend TSB implement a more effective method of monitoring and enforcing policies regarding complaint timelines.

A key use of law enforcement complaint information is to identify personnel that frequently or habitually engage in inappropriate behavior. Even if investigations are inconclusive, tracking such complaints can provide an "early warning" system to identify and take corrective action before such behaviors become career limiting for the employee or result in liability for the agency. LASD has developed such a program, the Performance Mentoring Program, as a proactive, early intervention program, to enhance an employee's professional performance through guidance and supervision.

We found some LASD personnel had multiple personnel complaints, including complaints for discourtesy and uses of force. We also found that the LASD early intervention program, performance mentoring, has been minimally used by TSB. We recommend TSB consider significantly expanding the use of the Performance Mentoring Program for employees with numerous personnel complaints, or other indicators of potential concern.

### **Security Organization and Responsibilities**

Metro Security is responsible for providing security over Metro facilities in addition to LASD's contracted law enforcement role. Metro Security is responsible for the Gateway Building, parking lots, bus division facilities and similar operations. It also includes providing security over Metro revenue collection and cash counting operations. In these roles, Metro security provides a visible deterrence, as well as observing and reporting unlawful activity to law enforcement. Metro Security should not have a role in responding to or handling law enforcement incidents.

We found that roles and responsibilities of Metro Security have not been clearly or appropriately defined, and in some instances, current roles extend beyond the authority and common practice of security officers. There is a need to communicate and coordinate Metro Security and LASD activities. However, the effectiveness of each will be maximized to the extent that their specific and separate roles are clearly defined and enforced. Each should operate within clear lanes of authority and responsibility, with overlaps and duplications minimized to the extent possible.

We recommend Metro develop clear and appropriate roles and responsibilities for Metro Security and develop a written strategy for the Metro Security function. In developing this strategy, Metro should evaluate the use of Metro Security staff to perform fare enforcement, issue transit citations, and perform other non-law enforcement functions.

The contract between Metro and LASD includes a number of specific requirements regarding Metro Security. We found many of these requirements regarding LASD oversight of Metro Security have not been implemented. Many of these requirements that are not being met relate to an attempt to integrate the Metro Security and LASD operations. The two have very different missions and authorities; as well as very different operational procedures, training requirements, and focus. Integrating the two operationally is neither practical nor beneficial. We recommend Metro consider



removing the requirements in the contract focused on integrating the procedures, training, and operations of Metro Security and LASD from future contracts.

The current contract also created a dual chain of command for Metro Security by assigning an LASD Lieutenant as Director of Metro Security, while command and control is assigned to the Metro DEO. This dual chain of command has not been effective in managing and supervising Metro Security. We recommend Metro consider creating a Metro position of Director of Metro Security to replace the current LASD Lieutenant, providing unified command for Metro Security under this position, and requiring ongoing communication and coordination with LASD as one of the key responsibilities of this position.

Both sworn LASD law enforcement Deputies and non-sworn Metro Security Officers are required to meet specific regulatory requirements. However, Metro Security Officers are operating in a gray area. Because they are not sworn law enforcement they are not subject to the requirements and oversight of the Commission on Police Officer Standards and Training (POST). Because Metro is not a private company, the Metro Security Officers are not subject to the State Bureau of Security and Investigative Services.

We found this lack of clarity over appropriate regulatory requirements and oversight of Metro Security Officers, and compliance with these requirements, creates substantial operation and liability exposure. We recommend Metro, with the assistance of LASD, clarify the appropriate regulatory requirements and oversight of Metro Security Officers, and ensure training, policies, and operations are adequate to minimize operational and liability exposure.

### **Personnel and Billing**

During our review of the LASD billings for costs related to contract service minutes, we noted there was lack of supporting documentation submitted with the monthly billings by LASD. LASD submitted monthly contract service billings to Metro with the support of the one-page Monthly Services Compliance Report (Form RAPS\_500A). This report only states the total service minutes provided by various ranks of sworn and civilian personnel for the current month with year-to-date total. It does not provide any of the detailed information required by the Contract. Metro performed only a limited review on the supporting documents and approved the payments made to LASD.

LASD's monthly contract service billing submitted to Metro for payment is not based on the current month's actual service minutes provided by LASD TSB personnel. Instead, LASD simply divides the total contracted dollar amount by 12 months to derive the monthly service fee billed to Metro. We noted that there was a substantial level of variability in the actual number of sworn minutes provided each month. The monthly compliance rates ranged from a low of 89.6% in August 2010 (FY 2011), to a high of 110% in June 2012 (FY 2012). If LASD is short in providing TSB personnel for a particular month as stipulated in the Contract with Metro, LASD does not adjust its monthly billing for the shorted personnel.



LASD's approach to billing for its services is based on developing fully loaded or fully burdened rates for its various service or line units. LASD includes in the rates for these services or units an allocation of LASD management and supervisory personnel, support personnel, and overheads. With our analysis on the number of position vacancies and actual hours worked by management and supervisory personnel during some periods of the contract, we noted there have been significant vacancies in the management, supervisory, and support positions that are included in the rates used to bill Metro. In addition, the actual hours worked by management and supervisory personnel included in billing rates were much lower than the hours set by the Contract for FY 2010 to FY 2013. Billing rates have not been adjusted based on the positions actually filled and the reduction of actual hours worked.

Management and supervisory personnel such as commander, captains, lieutenants and sergeants frequently work or CARP for other line support personnel while Bonus I (Senior Deputies) and Deputy Sheriff personnel generally CARP for line personnel who generate service minutes. Support personnel like Law Enforcement Technician will CARP other line personnel working in the dispatch desk. Some LASD personnel time was billed twice to Metro when personnel whose costs are included in the billing rates also generate direct billed time.

During our detailed testing on the selected contract service billings for FY 2013, LASD was not able to adequately provide documentation for some billed service hours (minutes), nor provide adequate responses for questioned and requested timecards and daily worksheets within the time period of this audit.

LASD does not have an adequate time recording system and record keeping to track personnel's time records related to the Metro Contract. During our audit, LASD did not most of the time have records we requested readily available and they needed to manually create the schedules requested for this audit.

### **Staffing**

Our evaluation of patrol staffing indicates that LASD has not provided the staffing levels required under the Contract. The shortage of personnel has partly resulted from the bureaucratic manner in which managerial and operational vacancies are filled. LASD should work with Metro to explore options to mitigate the impact of personnel turnover and expedite filling vacancies. We also found that Metro is often charged overhead costs for positions not actually filled because LASD does not rapidly fill vacancies in a number of special functions. This could be rectified by requiring LASD to submit information on actual staffing of overhead or support positions with each relevant invoice.

As noted in the transit community policing section, Deputies provided by the CARP program do not typically provide the same level of service as Deputies permanently assigned to TSB. This is due to CARPing Deputies' lack of experience and expertise in transit operations. Despite this, Metro reimburses LASD the same amount for work performed by any Deputy regardless of permanent assignment. We recommend that



CARPing for transit operations should either be eliminated or reimbursed at a lower rate than work performed by TSB assigned Deputies.

Ensuring a proper span of control of supervisors to line Deputies is essential to ensure adequate supervision and command oversight and implementing the goals set forth in the Scope of Work. We found that the span of control for specialist assignments is inadequate to provide sufficient command oversight for many of these assignments and draws sergeants away from the number authorized for field supervision. The ratio for field supervision, as defined in the Contract, should be one sergeant to every seven Deputies in the field, and one supervisor should be in charge of each specialized unit.

Finally, the LASD has never completed a comprehensive resource allocation analysis for transit services. Such an analysis has the prospect of improving numerous areas of operations in the TSB, particularly by improving the distribution of patrol Deputies. A resource allocation analysis is also essential given the challenge of providing policing services to both rail and geographically dispersed bus lines, with more rail and bus lines likely to be added in the near future. A resource allocation analysis will help both Metro and LASD determine whether they are meeting or failing to meet contractual standards in the most efficient manner possible, and will help the agencies adapt to changes as demand for TSB and Metro services increase.

### **Independent Audits and Reviews**

During our evaluation of past audits and reviews, we found one previous review related to Metro safety and security, and an operations assessment of all of Metro that included a section on Metro Safety and Law Enforcement. We summarized the general findings and recommendations of each, and determined if the recommendations had been implemented. We found that the majority of these recommendations were not implemented. We also found there was no indication whether recommendations made in these prior reviews were followed up. We recommend Metro formally review and follow up on issues identified and recommendations made in all reviews or assessments made regarding safety, security, or law enforcement services.

We also found that Metro has not taken advantage of periodic contract performance audits of the services provided by LASD as a contract compliance tool. We recommend Metro consider conducting such periodic audits to ensure contract requirements are being fully met, required services are being adequately provided, and contract billings are consistent with services provided.

### **New Contract**

Metro is currently in the process of preparing a new contract for safety and security services that will define how these services are to be provided, and will likely involve the expenditure of over \$400 million in Metro funds over the next 5 years. Potential stipulations to be included in the new contract for each of the findings and recommendations are included beginning on page 98 of this report.





### **Management Responses**

A draft report was provided to LASD and Metro on April 2, 2014. Both LASD and Metro management agreed with the majority of the findings and recommendations in the report and indicated that the recommendations will be evaluated and corrective actions will be initiated where appropriate. Copies of the management response received from each are attached at the end of this report.



## **2. Background**

The Los Angeles County Metropolitan Transportation Authority (Metro) has a 3-year contract (with 2 additional one-year options) with the Los Angeles County Sheriff's Department (LASD) to provide Metro with transit community policing services. This contract became effective on July 1, 2009; the first year of the contract was for an amount not to exceed \$65,921,937. In addition to sworn Deputies, the contract included 71 security assistances (non-sworn and non-armed) that primarily perform fare evasion checks.

Besides the security services provided under the contract with the LASD, Metro employs transit security officers. The transit security officers do not perform fare checks. The Deputy Executive Officer (DEO), Project Management, is responsible for managing the Transit Security Department and overseeing the contract with the LASD.

On June 28, 2012, the Metro Board approved Option 1 under the contract for an amount not to exceed \$80,622,796 covering FY 2013. The number of LASD administration, Deputy, and security assistant personnel totaled 604 for FY 2013, which was a staff level increase of 13 from the 591 staffing approved for FY 2012. The Board Report stated: "in FY 13, Metro will institute performance metrics which we expect the Transit Services Bureau (TSB) to meet. The performance metrics will focus on transit safety and security, public perceptions of safety and security, effectiveness to manage budgetary resources, and Metro's confidence, trust, and satisfaction in TSB. The goal of the performance metrics is to ensure a high performing law enforcement program to protect patrons, employees, and Metro assets."

On May 23, 2013, the Metro Board approved Option 2 under the contract for an amount not to exceed \$83,855,638 for FY 2014. The Board Report for this option includes a staffing level of 607 personnel and performance metrics for FY 2014.

In June 2013, the Metro Board directed the Inspector General to conduct an independent audit including the hiring of an outside firm to audit the contract with LASD.



### **3. Objectives, Scope and Methodology**

This audit assessed the efficiency and effectiveness of the following key areas:

- Transit Community Policing
- Requirements for Bus Operations
- Requirements for Rail Operations
- Communications
- Management Oversight and Performance Metrics
- Reports and Analyses
- Complaints
- Security Organization and Responsibilities
- Personnel and Billing
- Independent Audits and Reviews
- New Contract

The approach, methodology and tasks to complete this review for each objective are outlined in each section of the report. The period of our review was the five years of the current contract, FY 2009 to FY 2013.



## **4. Review Results**

### **Transit Community Policing**

Metro's Scope of Work for the LASD contract defines specific characteristics and expectations of the transit community policing services. This includes the overall vision, organization, and purpose of the program. It also defines specific requirements related to personnel, operations, and services provided. One of these requirements is that the LASD prepare and submit an annual Transit Community Policing Plan designed to "successfully implement the best and most innovative Transit Community Policing Program in the nation." Under the concept of a transit community policing plan, it has been expected that the focus would be on problem-solving and enforcement activity occurring within the limits of constitutional parameters, recognizing that addressing problems of disorder and crime are often best resolved by prevention of future occurrences rather than just the arrest of offenders, particularly in minor incidents.

In assessing transit community policing, we:

- ✓ Obtained and reviewed documents pertaining to transit community policing developed by the LASD.
- ✓ Compared and evaluated these documents with the requirements outlined in the contract scope of work.
- ✓ Compared and evaluated the aforesaid documents with current industry best practices to determine if they provide for a transit community policing service that is "best and most innovative."
- ✓ Conducted site visits and observations of LASD contracted services to obtain an in-depth understanding of their functions, deployment, and operations and to determine if the Transit Community Policing plan is being implemented in operations.
- ✓ Identified and evaluated LASD internal mechanisms for providing management and oversight of their operations (e.g., CompStat) to ensure plans, policies, and procedures are being followed.
- ✓ Developed conclusions, findings, and recommendations.

Our data collection and analysis efforts were targeted toward providing answers to the following questions outlined in the Request for Proposals:

1. Is an annual Transit Community Policing Plan prepared, is it adequate, and is it followed?
2. Are CompStat and other similar process approaches adopted and followed by LASD effective for police management and deployment?



## Transit Community Policing Plan

As stated above, a requirement of the contract between Metro and LASD is that the LASD prepare and submit an annual Transit Community Policing Plan. Such a plan and program would include an ongoing dialogue and exchange of information between all employees and contractors of the system. It should identify principles of community policing that are tailored for the transit environment. This planning process should clearly define the roles for LASD Deputies, Metro Security Officers and LASD Security Assistants. It should also evaluate the physical environment of the Metro system as it relates to safety and security issues.

### ***Finding 1: There is no specific Transit Community Policing Plan or Program and few defined responsibilities for transit community policing participants.***

In spite of both Metro and the LASD's stated desire to achieve a program focused on proactive police work with an emphasis on improving the quality of life and the prevention of crime within the transit system, the achievement of these goals remains elusive in part because there is no Transit Community Policing Plan nor written program designed to achieve these goals.

The lack of a clear, centralized plan has led to siloing among the TSB and between the LASD, Metro, and transit contractors. Communication needs to be improved between Deputies, Metro security officers, and Security Assistants (SA's).

There is a significant lack of role definition between the three primary sources of enforcement/safety efforts: LASD, Metro Security and the LASD Security Assistants. Their roles overlap, and as a result there is a lack of clarity as to areas of responsibility. For example, Metro Red Line station security is the responsibility of LASD, except for the closure of stations, which is nominally the responsibility of Metro Security. Fare enforcement is the primary duty of SA's, but Deputies are also expected to participate.

There is a need for better coordination between the various elements within TSB, and also between TSB and Metro. The Deputies permanently assigned to the TSB are highly motivated and committed to the achievement of goals. However, due to the lack of a strategic plan or central direction, a number of the Deputies report being uncertain as to exactly what is expected of them. All parties have a limited understanding of community transit policing beyond the language in the contract. As a result, many in the TSB report being uncertain of Metro's objectives for the transit system as well.

A lack of clarity as to expectations of various personnel within the program also contributes to divergent approaches and a general breakdown of communication regarding operations. An example is found in the area of fare evasion. Metro executives place a great deal of importance on Deputies being aggressive in checking TAP cards. While 75 to 80 TAP checks per day is the desired goal, there is a lack of clarity as to exactly what the end result of these checks should be. Some Deputies believe that they are expected to write citations and enforce zero-tolerance for fare evasion; however, others believe that they should accept reasonable explanations for non-payment of the fare as part of overall customer relations.



There are also systemic, non-LASD related issues that contribute to this lack of clarity. For example, in spite of signage, some customers seem unaware that they are required to TAP in when they change trains within the system. In some stations, the location of the TAP stations is not readily apparent. Such systemic issues give transit customers excuses for non-payment of fares. Some clarity as to what is expected under these circumstances would be beneficial for everyone involved.

***Recommendation 1: Metro should require LASD to develop a comprehensive Transit Community Policing Plan that clearly articulates the expectations and responsibilities of everyone associated with community policing responsibilities on the Metro system.***

### **Transit Community Policing Principles and Goals**

According to the U.S. Department of Justice's Office of Community Oriented Policing Services (COPS), community policing is an approach defined by combining the development of partnerships (i.e., the building of relationships) among affected stakeholders and with problem solving. Concerted engagement in these activities ultimately results in transformations within law enforcement organizations and communities as their efforts break down cultural barriers. Community policing within a transit system should place an emphasis on quality of life issues. The customer base on which the system is dependent must feel safe and secure; thus, the presence of security, in whatever form, must have a "felt presence;" that is, they must be visible and engaged without becoming oppressive and threatening.

Quality of life issues such as fare evasion, graffiti, and panhandling are problems within the system. Program personnel should employ a zero-tolerance approach for minor issues in order to ensure that an environment enabling the commission of major crimes does not emerge.

It should be clear that everyone involved with the system – employees, Deputies and customers – has an overall responsibility for the achievement of the described standards. It should be clear that customers entering the system are free to approach anyone associated with Metro with questions as to the system's operations and be assured that they will receive accurate and appropriate information. Similarly, the standards of conduct with respect to such quality of life issues as panhandling, sleeping on trains and buses, and playing loud music either on the conveyance or in the station should be dealt with effectively and efficiently.

***Finding 2: There are no planning or stated goals for community policing in a transit setting, including no reflection on the unique challenge of community policing for a transit population, no focus on quality of life issues, and a lack of service-orientation.***

The use of community policing principles within a municipality rests on several assumptions, many of which are either not present or present in a far less significant



fashion in the transit environment. These assumptions include a stable business community, a network of local infrastructure (e.g., neighborhood associations, school districts) and a defined jurisdictional base (i.e., clearly defined boundaries with attendant jurisdiction).

The transit environment is significantly different from a typical municipal law enforcement environment. The mobile nature of the infrastructure (rail cars, buses), the ebb and flow of people (most of whom will have little time or inclination for dialogue with law enforcement) and the sheer size and continuous motion of the system with attendant time constraints resulting from the need to adhere to a fixed schedule all present challenges to the implementation of traditional community policing.

While the contract describes various operational issues that should be addressed (i.e., fare evasion, graffiti) and uses the term community policing throughout, there is no concrete definition of how the term is to be used. It is not sufficient for Metro to simply stipulate that it wishes LASD to conduct community policing in the transit system, as "community policing" as traditionally understood is not applicable to a transit system. Indeed, Metro's goals as outlined in the contract could be just as well or more clearly understood as a transit security plan with service and quality of life-oriented objectives.

LASD has not planned for the challenges of community policing in a transit system. It has approached policing transit as just another contract within their overarching municipal contracting system. Although LASD is a leader throughout the country in providing contracted municipal law enforcement services, that very expertise may have prevented an appropriate focus on the unique aspects of policing transit systems (i.e., expansive geographic scale, mobile infrastructure). Instead, the model employed in the contracted cities has been utilized with some resulting significant limitations.

For example, in municipal police operations, law enforcement officers do not generally view the public as customers; and, other than emergency situations, the public is not generally dependent on law enforcement for operational information. The situation in the transit system is far different, particularly for users who are visiting from out of town or who do not use the system on a regular basis. Such persons are likely to lack knowledge about how to access the system, how to select a particular line, etc. Since Deputies are often the most visible members of the Metro system, they become the focus of customer inquiry. How these Deputies interact and treat the public will significantly shape the public's view of both Metro and the LASD.

Paramount in shaping an effective community policing program on a transit system is the concept of "felt presence," which refers to the creation of an environment where a sense of safety and security is manifested by uniformed law enforcement officers in a fashion that reinforces a sense of security that does not become oppressive. Reports and observations from both customers and Metro employees suggest that Deputies are not perceived as being physically present in any significant way. Further, when they are present, they tend to converse amongst themselves and avoid direct interaction with the public other than when taking some form of enforcement action (e.g., fare checks). Increasing "felt presence" will require a conscious commitment to the concept from TSB leadership, including additional training for Deputies.



Finally, implementing all of these improvements will require a strategic reassessment of how personnel resources and operating divisions are allocated. The current division of responsibility within TSB is line based rather than being linearly deployed to police a geographic area. The Lieutenants have line responsibilities, but the Captains have area responsibilities. There is often a division between bus and rail that dilutes the presence of Deputies. There was a team assigned to bus riding, but that presence appears to have been significantly reduced due to budget concerns.

In spite of the contractual requirements to focus on quality of life issues, it appears that the LASD culture remains fixed on the apprehension of criminals and the prevention of terrorist acts. While both of these goals are admirable and appropriate, they do not meet the other strategic requirements of the transit system. Dealing with the homeless and mentally ill, assisting tourists, and checking for fare evasion do not appear to be priorities either for line Deputies or for the LASD executive staff.

**Recommendation 2: Metro should work with LASD to identify principles of community policing that are tailored for the transit environment as part of the core Transit Community Policing Plan. These principles should include 1) "felt presence," 2) community partnership, 3) crime prevention (principally through a focus on quality of life issues), 4) service-orientation, and 5) problem-solving.**

### **Assignment of Personnel to Transit Services**

Assignment to the transit system should be seen as a prestigious and highly desirable assignment. The Deputies should be knowledgeable about the system and clear as to what is expected of them, both by Metro and the LASD command. No LASD staff on any kind of temporary assignment to TSB should not work alone or with someone not permanently assigned to the Bureau.

LASD should develop a certification process for personnel assigned to transit. This certification process should include a formal training program based on nationally recognized best practices for transit operations.

***Finding 3: Transit Services Bureau assignment is not seen as a prestigious or desirable assignment.***

TSB is not seen as a prestigious assignment within LASD, one in which Deputies require specialized skills that should be honed and respected. For some members of TSB, assignment to the Bureau instead appears to be seen as a punishment tour or a source of overtime. The TSB itself does not carry a status commensurate with its importance. Instead, the TSB is simply another Bureau of the Homeland Security Division, and not one with resources and status commensurate with its critical mission.

This lack of appreciation of TSB's importance and the resulting lack of transit expertise within the LASD is compounded by the practice known as *CARPing* (Cadre of Administrative Relief Personnel). *CARPing* places Deputies whose normal assignment is outside the transit system to temporary (usually 8 hours) assignments within the





transit system. The personnel assigned lack the transit training, equipment, and familiarity required to operate effectively within the system.

The type of policing that TSB personnel should be engaged in is cutting-edge and requires specialized skill and training. TSB Deputies should be recognized for their skills and expertise and held to high standards. Their efforts need to be supported by a concerted effort to deploy these skills strategically and to further develop them.

CARPing and other temporary duty assignments by personnel not certified for transit operations should be eliminated other than for emergency situations. Finally, some thought should be given to making transit an alternative assignment to custody duty for those Deputies just leaving the academy. Having experience with custody duty does not prepare a Deputy for field assignment. Making transit the first experience, providing there is a strong field training program, can bring energetic young Deputies into the transit environment.

***Recommendation 3: Metro should require LASD to develop transit security operations as a specialized expertise within the department, complete with rigorous standards and training requirements.***

### **Transit Policing Accountability**

CompStat and other approaches to bringing accountability systems to police management and supervision have been very effective in focusing police resources and substantially improving the quality of policing provided.

### **Finding 4: The Transit Services Bureau does not effectively enforce focused accountability.**

The transit community policing program's lack of focused accountability results from the absence of a bona fide performance management system that holds supervisors accountable for their leadership. The Intelligence Led Policing (ILP) program – which is LASD's TSB's version of CompStat – produces meaningful information. However, the periodic meetings generally involve a dissemination of that information without drawing any strategic conclusions or helping to develop a specific proactive transit policing program. The information sometimes results in a reactive direction, but without any focused accountability. Team members observed that the LASD crime analysts read the information to the area Lieutenants rather than the Lieutenants being responsible for information and results.

As we note in a later recommendation, the restructuring of the TSB into geographic command areas can provide the basis of improved accountability for service quality and Deputy performance. Placing Lieutenants in charge of geographic areas and both bus strategies and rail station strategies provides a basis for monitoring performance through a reviewed performance management scheme.

The current Intelligence-Led Policing process should be restructured to more resemble a CompStat process, with geographic commanders reporting on the state of crime and disorder in their assigned geographic area. This will ensure that they are aware of the



status of conditions and that they can articulate strategies they are employing to address quality of life issues such as panhandling, vandalism, and other disorder as well as crime patterns.

This approach will require a more robust crime analysis capability that provides report commanders with a greater variety of data on activities and outcomes from Deputies under their command. A resource allocation analysis recommended in a later part of this audit will provide measurements of staffing, and whether the elements of the contract for service to Metro are being met.

The entire performance management process should also be structured around the performance elements of an enhanced contract to ensure that all requirements agreed by Metro and the contracting police agency are being met. Senior management personnel will need to be trained on how to run performance management meetings and the geographic Lieutenants will also need specialized training in the process if it is to be successful. A robust performance management process, as described above, can dramatically increase the sense among Metro that policing is addressing the priority issues that are of concern.

In restructuring the performance management process, Metro and TSB should follow the lead of the London, England transport agency (Transport for London) and invite Metro management to participate in the performance management meetings. Many of the problems addressed in these performance management meetings relate to issues that are not only police matters, but issues other agencies and units of Metro need to collaborate in addressing as well. This will dramatically increase the agencies' proficiencies for problem solving throughout the transit system.

**Recommendation 4: Metro should require LASD to foster a culture of true accountability within TSB, including restructuring the Intelligence-Led Policing process so it provides a true system of accountability.**



## **Requirements for Bus Operations**

In addition to general requirements, Metro's Scope of Work for the LASD contract defines specific requirements related to bus operations. These requirements define the service areas, and working with each of Metro's bus operating divisions.

In assessing the requirements for bus operations transit community policing, we:

- ✓ Obtained and reviewed documentation pertaining to support for bus operations.
- ✓ Compared and evaluated this documentation with the requirements outlined in the contract scope of work.
- ✓ Compared and evaluated bus security operations with current industry best practices.
- ✓ Conducted site visits and observations of LASD bus security services to obtain an in-depth understanding of their functions, deployment, and operations and to determine if the bus security plan is being implemented in operations.
- ✓ Developed conclusions, findings, and recommendations.

Our data collection and analysis efforts were targeted toward providing answers to the following questions outlined in the Request for Proposals:

1. Is there an LASD strategy to support bus operations, consistent with and meeting reasonable security goals for bus operations? Section III A. (base contract) Scope of Work states that LASD shall develop a plan for addressing transit security issues to ensure the safety of customers, operators, employees, revenues, and assets.
2. Is LASD meeting the current bus plan and goals for maximum security?

## **Bus Operations Policing Plan**

The jurisdictional area of the TSB is extremely large and the resources assigned to the Bureau to police such a large geographic area are relatively small. For such a large jurisdictional area, the TSB cannot expect to be a first-line policing agency responsible for all policing activity that impacts transit in the area. The Bureau must instead focus on reducing risk, incidences of disorder at key locations, and maintaining a strong presence at locations where public safety and order are most at risk and where the public most demands police services, while local police agencies should handle emergency calls for service emanating from the bus system when TSB Deputies are not in the vicinity. This focus could best be accomplished through a strategic bus operations policing plan that corresponds with the overall strategic plan.

### **Finding 5: LASD has not developed a bus operations policing strategy.**

Metro has been fairly clear in what it considers adequate security on the bus and rail network; however, the TSB has not developed a strategy that addresses those priorities.



Metro's first priority is to have rapid responses to bus incidents, and it uses TSB response time data to evaluate the success of that response. We have found that this data contains significant flaws that overstate the timeliness with which responders typically arrive at the scenes of incidents (see Communications Section). The second priority for Metro is addressing quality of life issues and disorderly conduct on buses. The Bureau has not developed a strategy for addressing those concerns (see Transit Community Policing Section).

Deputies patrolling buses should have a "felt presence" on the system, talking to the bus operator about conditions on the bus, or briefly engaging with bus passengers waiting at bus stops. Deputies with felt presence indicate to passengers and bus operators that there is a strong policing presence in the area, and this presence increases the sense of security among both passengers and operators.

Locations where there has been repeat incidents of crime and disorder should be key assignment areas. At these locations, the TSB should develop a strategy and identify tactics that can address the problem noted. If it is reported that many passengers have not paid fares, Deputies should conduct high-impact enforcement for a period of time. If the problem is disorder caused by youth after school, Deputies should have a presence in the area, interacting with the traveling youth.

It is important to have a law enforcement manager (Lieutenant) serving as the accountable police manager for the area. The accountabilities of the manager must be made clear, and should include the following:

- Having knowledge about all crime and disorder problems in the jurisdictional area;
- Having a strategy or plan for addressing those problems;
- Having an engaged and productive group of Deputies working on priority problems in the jurisdictional area;
- Ensuring quality of performance of the Deputies so assigned;
- Presenting information on the status of problem-solving in the jurisdiction at Intelligence-Led Policing or any future CompStat-like meetings; and
- Responding effectively to issues of concern to Metro employees and management staff.

In order for accountabilities to be real, the manager must also have certain authorities that permit him or her to do their job. The key accountabilities must include the following:

- Authority over the assignment of personnel to various assignments in the policing area.
- Full staffing without vacancies according to agreed upon staffing levels contained in the contract with the policing provider (i.e., vacancies must be immediately filled).



- First level management control over disciplinary actions and rewards for excellent performance.
- Acceptance that requests for special assignments sought by Metro must come through the accountable manager (Lieutenant).

Developing a bus policing strategy is not a simple matter. It will require substantial review of past incidence of crime and disorder on the bus network and consider approaches and tactics that will best impact those problems with the limited resources available to the TSB. The policing strategy might include the following elements:

- The nature of incidents common on buses throughout the jurisdiction.
- The repetitive patterns of these events, by type.
- The normal responses undertaken to these incidents.
- How resources can be targeted to best address these common problems.
- Transit policing and Metro activities and tactics that can prevent occurrences.
- Guidance for use of limited Transit Policing resources to impact the patterns of events.

The bus policing strategy must also address the best means for involving other police agencies in the jurisdiction in addressing these problems, and whether sharing responsibility for responding to different types of incidents is appropriate. With limited resources to permit response to all incidents, the Bureau should focus on carefully reviewing all reports of incidents to understand the nature of these events, identify patterns of occurrences, and develop strategies and tactics that will impact the likelihood of future events. This review should include follow-up with victims of crime to ensure they have been properly treated and to gain additional insight to the events surrounding the crime. They should identify other factors that might lead to the recurrence of such events or crime patterns, collaborating with other Metro units in considering station and bus design changes that may limit future occurrences, and adopt the principles of CPTED (Crime Prevention Through Environmental Design)<sup>3</sup> to limit the opportunities for crime and disorder.

**Recommendation 5: Metro should require LASD to develop a bus operations policing strategy that reflects the nature of the challenges faced in addressing crime and disorder on buses, reflects the generally limited staffing available for bus policing and makes maximum use of local police resources in responding to serious bus crime and disorder incidents when a LASD Deputy is not nearby.**

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<sup>3</sup> Crime Prevention Through Environmental Design (CPTED) was originally coined and formulated by [criminologist](#) C. Ray Jeffery, who noted that the environment – how buildings and public space are designed – can have a direct impact on behavior of persons using that public space. The concept has been successfully adopted as part of the planning and designing of many public spaces.



## **Responding to Bus Incidents**

The jurisdictional area in which the many bus lines run cannot be fully policed by the relatively small TSB staff, numbering only about 400 sworn law enforcement personnel, of which a substantial number are assigned to specialized duties and policing on rail. When a situation arises on a bus requiring a rapid police response, officers must get to the scene quickly. Local police are far better geographically placed to handle these types of situations, as there are typically substantial numbers of police assigned to the geographic areas in which buses travel.

### **Finding 6: The size of the transit service area (jurisdiction) makes it difficult for Deputies assigned to the TSB to be first responders to all incidents of crime and disorder that occur on the bus network.**

Under the TSB's current system, there is often no transit policing unit nearby to respond rapidly to a bus operators' calls for assistance. Because bus operators want to keep buses moving along the routes so delays do not occur, buses are frequently not at the location where calls for assistance were made, and responding police units – arriving sometime after the buses have left the location – must rush along the routes trying to catch up to the buses. If local police were to respond to such incidents instead of TSB Deputies, the response time would often be quicker, resulting not only in better response times but also greater satisfaction among bus operators regarding police responsiveness to their calls for assistance.

The bus operations strategy must address the types of responses that should be routinely made by TSB Deputies, by local police, and those in which no immediate response is made, but there is follow-up when the operator returns to the bus division at the end of the run. When no unit is close to the bus, local police should be notified and requested to respond. When local police respond to calls for service on buses, TSB Deputies that are most nearby would also arrive on scene at a later time to investigate the circumstances of the incident and determine how similar incidents could be prevented in the future. When such responses are made, the TSB should receive notification of the response and assess the situation afterwards to determine if it is a part of a repetitive pattern; if so, TSB should develop a preventive strategy to reduce the chance the situation will occur again.

A large number of incidents to which the TSB responds or which are called into the Transit Security Branch Communications Center relate to situations that are not one-time incidents but a pattern of occurrences that are repeated. They do not occur randomly throughout the bus system. Thus, a thoughtful, analytical strategy must be developed to prevent future occurrences, with actions being taken not only by TSB but by bus operators, Metro management, and other police agencies through preventive patrol, target hardening, public information releases, and community education.

TSB's primary focus needs to be problem solving, not immediate response to events, which are better handled by local police of the jurisdiction through which the bus is traveling when an incident occurs. This approach will require close coordination with local police agencies (such as the LAPD, Long Beach Police etc.). Much of the crime on



buses relates to the area through which the bus is traveling; and, such crime could often require a response from local agencies anyway and would likely often pertain to crime patterns and subsequent investigations in local jurisdictions.

**Recommendation 6: Metro should require the LASD to identify how the concerns of Metro will be addressed in its bus policing strategy. This strategy needs to be developed in collaboration with Metro bus managers and other jurisdictions through which the bus network runs.**

### **Bus Policing Structure**

Bus lines run through a number of neighborhood areas, often across the city or county. While Lieutenants are assigned responsibility for rail line policing, bus policing is attached to those longer areas, making it difficult for Lieutenants to know exactly what is happening in smaller geographic areas along the route. It is difficult to know who has ultimate responsibility for transfer stations where many people move between bus and rail locations and where substantial policing activity is often needed.

Problems requiring police action often occur at bus stops. Bus stops do not necessarily correlate with the rail lines, and many of the problems that occur at the stops are generated by activities in the surrounding neighborhood. Thus, moving toward a neighborhood structure would help resolve problems stemming from the neighborhoods in which the bus stops are located and would improve the Lieutenants' accountability for all activities in the assigned geographic area.

**Finding 7: The current Transit Services Bureau transit police structure, organized around rail lines, does not provide the geocentric focus for policing the bus network, which is largely related to geography and the neighborhoods through which the bus routes pass.**

The policing jurisdiction should be divided into four or five policing areas, each a grouping of political or social geographic areas, and each with a Police Lieutenant assigned as the geographic Commander for that area. Deputies assigned to that geographic area should undertake all bus-related policing activities. These Deputies should address problems that have been identified by crime analysis and Metro, including crime and disorder. Each Deputy sent on patrol in the area should have an objective in mind, such as patrolling a section of the area that has seen repeat incidents of disorder or accompanying Metro employees performing fare enforcement in areas where there is evidence that fare evasion is prevalent.

A revised structure would also put one Captain in charge of the rail lines, special operations, and specialized functions serving the entire TSB, and one Captain in charge of the bus service and rail stations in those areas, with Lieutenants' assigned to smaller geopolitical and neighborhood boundaries as opposed to the combined "TSB North" and "TSB South" areas organized primarily around rail lines.

TSB could also modify the current structure, keeping the two Captain's areas (North and South, if that is desired). In such case, each Captain would have two or three sub-areas



with a Lieutenant in charge of each of those areas. Department specialties could be divided between the two Captains, or a Lieutenant reporting to the Commander could be in charge of specialist assignments.

In either case, community policing and effective transit policing for buses and rail stations requires that accountable managers have geographic responsibility for everything that occurs in their assigned areas. Both of these structures would improve efficiency in both rail and bus patrols by ensuring that Deputies assigned to rail will be dedicated to their rail lines and will stay on their regular patrols while those assigned to bus duties will respond quicker to calls for service emanating from buses.

**Recommendation 7: Metro should require LASD to reorganize the transit policing structure to provide geopolitical and neighborhood-based coverage for bus routes and neighborhood rail stations, and line-based coverage for rail lines and on-line crimes.**





## **Requirements for Rail Operations**

Metro's Scope of Work for the LASD contract defines specific requirements related to rail operations. These requirements define the service areas and operations with each of Metro's rail stations. These requirements have also recently changed substantially in response to implementation of Metro's gate latching initiative. This initiative, required as part of Metro's TAP Program, requires substantial increases in security monitoring, presence, and response to address passengers unable to exit the system. It also creates substantial changes in the emergency response plans and tactics for latched rail stations.

In assessing the requirements for rail operations transit community policing, we:

- ✓ Obtained and reviewed documentation pertaining to rail operations.
- ✓ Compared and evaluated this documentation with the requirements outlined in the contract scope of work.
- ✓ Compared and evaluated rail security operations with current industry best practices.
- ✓ Conducted site visits and observations of LASD rail security services to obtain an in-depth understanding of their functions, deployment, and operations and to determine if the rail security plan is being implemented in operations.
- ✓ Identified and evaluated changes implemented in LASD rail operations security in response to implementation of Metro's gate latching initiative.
- ✓ Developed conclusions, findings, and recommendations.

Our data collection and analysis efforts were targeted toward providing answers to the following questions outlined in the Request for Proposals:

1. Is there a LASD strategy for rail operations, consistent with and meeting reasonable security goals for rail operations? Section III B. (base contract) Scope of Work states that LASD shall develop a plan for addressing transit security issues to ensure the safety of customers, operators, employees, revenues, and assets.
2. Is LASD meeting the current rail plan and goals for maximum security?

## **Rail Operations Policing Plan**

At present, LASD lacks a rail operations policing strategy. A rail operations policing plan should include how the TSB can address the contract objectives as well as provide for maximum security on the rail system. In the previous section, we described the strategy for policing the bus network; the strategy for policing the rail network will require a somewhat different focus.



**Finding 8: LASD has not developed a rail operations policing strategy.**

Metro has expressed specific objectives it seeks to achieve on rail. One has been addressing fare evasion; another is providing a security presence throughout the system; and a third is addressing disorderly issues in stations, particularly at Union Station. Absent a plan for addressing these issues, Deputies often will assume they do not have the authority to take action, particularly regarding homeless individuals, who might panhandle, sleep, or otherwise unlawfully loiter in Union Station. Other police agencies with strategic plans have been successful in addressing these problems.

A strategy to accomplish these objectives is needed. The strategy would provide the basis of resource allocation decisions and what Deputies in various types of assignments will do. It would also define performance objectives and outcome measures.

Parts of the rail policing strategy should address interaction with customers – in a community policing sense – and the interaction of the TSB with neighborhood organizations around stations. Many of the issues impacting an individual station are related to issues that exist in the neighborhood surrounding the station. One objective of rail stations is to create what the community will view as “safe havens” for people from the community traveling on public transit.

A proper approach for policing rail is not the same as that for policing buses. Many rail stations are far more enclosed spaces than bus stops on city streets. This creates a sense among some portion of the public that there is no escape from the environment, but also a sense among others that the enclosed environment – which is often well-lit and full of onlookers who would not tolerate serious crime or disorder – is safer than other areas where criminals could potentially confront them without anyone else witnessing the encounter. Much of the success of transit policing in cities such as New York and London owes to the ability of police to interact with the public in a manner that reinforces the positive aspects of stations and minimizes the negatives.

The rail policing strategy should include the following elements:

- The nature of incidents common on rail through the jurisdiction;
- The repetitive patterns of these events, by type;
- The normal responses undertaken to these incidents;
- How resources can be targeted to best address these common problems;
- Transit policing, Metro activities, and tactics that can prevent such problems; and
- Guidance for use of limited Transit Policing resources to impact the patterns of these events.

Specific sections of the rail policing strategy should address special problems such as those relating to homelessness such as panhandling, sleeping in rail stations, and loitering.



**Recommendation 8: Metro should require LASD to develop a rail policing strategy that identifies how the challenges of providing a policing presence while addressing the need for response to rail crime and related incidents can best be met.**

### **Order Maintenance on the Rail System**

Few issues impact passenger fear and comfort on public transit as situations that convey a lack of order in the transit environment. The challenges in addressing these situations have been known for some time, and many transit agencies have addressed these problems by adopting a collaborative strategy involving police, transit officials, city officials, and non-government organizations that assist the homeless.

Effectively addressing these issues requires a full understanding of the "Broken Windows" theory set forth by James Q. Wilson and George Kelling first set forth in their article in *The Atlantic* in 1982. They noted that in neighborhoods, housing projects, and transit environments, when minor occurrences of disorder or signs of disrepair (such as a broken window) exist, those smaller problems tend to multiply and the environment becomes less safe until it is out of control, driving away residents *unless* those small issues are addressed quickly.

The first application of the Broken Windows theory in a transit environment was in New York City, when the new transit Chief of Police, William Bratton, applied the theory as the cornerstone of his efforts to increase public confidence in the safety of New York City transit. Bratton's strategy was to dramatically reduce illegal loitering and sleeping in subway stations, control panhandling that was perceived as threatening by the public, clean up the station environment, and undertake other actions to restore a sense of order and thus safety to the transit system.

LASD Deputies may claim they do not have the authority to directly address these issues but they have a major role to play if they collaborate with other city and transit personnel. The cornerstone to getting such an effort underway is for transit police to acknowledge the seriousness of the problem and commit to finding ways to address it.

**Finding 9: LASD has not adequately addressed some of the order maintenance issues that have been of concern to Metro management, particularly related to activities in Union Station.**

Despite requests for assistance in addressing the problem of disorderly persons camped in Union Station and issues such as panhandling, the LASD has generally taken the position that there is little they can do to resolve the problem.

In Los Angeles, a joint effort between the Los Angeles Police Department and the Central City East Association (a business improvement district) achieved substantial success over the last eight years in addressing disorderly activity related to homelessness such as panhandling, illegal loitering, and related activities in the Skid Row/Central City East area of the city. Dr. George Kelling assisted in developing a strategy alongside Los Angeles government agencies (including LAPD), the business



community, non-governmental organizations, and others that ultimately culminated in a dramatic change in the area. We believe the same approach should be taken by the TSB to address these order problems in key rail stations, starting with Union Station.

Accordingly, Deputies must be trained in addressing these quality of life problems, understanding how they can respond to what they observe in the station, who they can call for assistance, and what powers they actually have. Once Deputies succeed in solving the immediate problems that they observe, Union Station will reach a tipping point as occurred throughout Manhattan in New York City and in Skid Row/Central City East, Los Angeles where orderliness becomes the norm. We believe that is clearly achievable in the Metro environment.

**Recommendation 9: Metro should require LASD, as part of their rail policing strategy, to outline actions that will effectively address the problems associated with homelessness, disorderly conduct and other issues in stations that unsettle the public using transit.**

### **Proximity Patrol as a Rail Policing Strategy**

First used by the British Transport Police on the London Underground subway system, proximity patrolling involves two or more officers always being in sight of other officers or in communication with them in case immediate assistance is needed, but never standing or walking beside each other as they patrol the station.

Assignments of LASD Deputies to stations should require that they adopt proximity patrolling. When moving on trains for their fare enforcement activities, Deputies should enter different doors, increasing the sense among riders of the police presence.

Also essential toward increasing the feeling of police presence on the system is employing the concept of “felt presence” in station and train patrols. To do this, officers must “touch” as many persons who pass them as possible. A nod, a brief smile, a hello, and even engaging passengers who appear lost can make a major difference in how the public perceives these officers. Many Deputies will not have an inherent sense or comfort in engaging the transit-riding public in this manner, and many Deputies will have to learn how to do this so they are comfortable with it.

**Finding 10: LASD rail policing operations do not include effective proximity patrolling or training Deputies to have a “felt presence”.**

While efforts have been undertaken by TSB to increase visibility (e.g., Deputies assigned to foot patrols are no longer assigned vehicles, Deputies now being assigned to “directed patrol,” etc.), LASD Deputies, when patrolling stations, often simply stand together in place, watching passengers walk by. They have limited contact with passengers and do little to increase the public’s sense that police officers are engaged while they are in the station; thus, their impact on public fear is far less than what might be achieved with a more robust felt presence.

Deputies assigned to stations, if they simply stand alone or beside a partner, will find the assignment boring and ineffective. Having an active, robust presence can have a



dramatic impact on public perception about the safety of the station. There are a number of Deputies in the TSB who create a “felt presence” in stations, but many others who do not. Every Deputy working under the Metro transit security contract must be skilled in this type of assignment (whether it is in the rail environment or the bus environment) if the problems of concern to the riding public and Metro management are to be addressed.

**Recommendation 10: Metro should require LASD to train Deputies assigned to transit in proximity patrolling (i.e., patrolling independently of each other while in close proximity) and how to create a “felt presence” when patrolling trains and stations.**

### **Rail Fare Enforcement Strategy**

There is concern among Metro officials about fare evasion, based upon evidence that a portion of the riding public does not pay fares. The Metro light rail system is largely an “open system” where access is not restricted by barriers at many locations. There is confusion by patrons as to where and when they are required to tap their fare cards to show that they have paid the appropriate fare. At transfer points between lines, passengers are not always aware of the machines where they must tap their cards. This presents a major challenge to enforcing fare requirements.

**Finding 11: Metro’s strategy for enforcement of fare evasion must be revisited and alternative structural elements need to be considered.**

Metro has requested that LASD require each Deputy to check 80 passengers a day for fare payment by tapping their ticket on a recording device carried by the officer; however, not all Deputies have these devices. Total taps made by Deputies does not necessarily relate to the number of Deputies who are actually assigned to Metro duty, and many Deputies do not like to move through the trains checking fares.

LASD employs fare enforcement Security Assistants who also check for fare payment, and they are expected to make over 200 fare checks a day. When analysis identifies locations or lines where it is believed large numbers of persons do not pay fares, teams of LASD personnel sometimes engage in coordinated fare enforcement initiatives.

Given Metro’s prioritization of fare enforcement, the current system is not achieving the desired result. Metro itself must undertake a total review of the fare enforcement in cooperation with the TSB, and if Deputies are to continue to have a major role in the effort, that role must be better defined and coordinated.

Metro needs to measure compliance at least quarterly, and more in areas targeted for more rigorous enforcement. Fare enforcement actions need to be targeted to those areas in which there is the greatest non-compliance. This is not to say that fare enforcement should not occur in other areas as well, but not at the same level as the areas with the greatest degree of non-compliance.

The roles of Deputies must be carefully considered. Questions that must be answered include whether Deputies should even have responsibility for fare enforcement as one



of their primary duties on Metro lines or whether they should focus on working as a team with other security personnel at high non-compliance areas. If Deputies are to do compliance checks, it should also be decided whether they should do so in pairs or can they work as single patrols. Overall, the process must become far more strategic than it is currently.

It is also important that the data on the level of Deputy checks take into account the actual number of Deputies assigned to this duty, and not include those Deputies who have inside duty, special enforcement assignments not related to train patrols, and other assignments that take them away from train patrol responsibilities on a given shift.

The total solution in fare enforcement cannot rest solely on the level of "tap checks" made throughout the system. There must be a more strategic approach to fare enforcement. A comprehensive review should consider the strategy for measuring fare compliance on a regular basis, and how that data is translated into focused police and other Metro enforcement efforts at locations where non-payment of fares is greatest. This is the strategy that has been used with great success in New York City and London Transport's underground and rail systems.

**Recommendation 11: Metro should require LASD to perform a comprehensive review of the fare enforcement strategy to address the variety of roles Deputies and Metro employees should play, as well as how to regularly measure compliance, how to target areas with greatest non-compliance, and how to reduce the confusion passengers face regarding tapping their cards.**



## **Communications**

In addition to general communications requirements, Metro's Scope of Work for the LASD contract requires an adequate Police Radio Dispatch and Communications capability that minimizes the response times on call for service from LASD or a local police agency. During January to October 2013 and according to LASD's data, emergency response times to bus incidents increased by 13% and emergency response times to rail incidents increased by 34%. To reduce these times as well as response times to non-emergency and major incidents, a seamless and fully integrated communication system is required.

In assessing the communications operations, we:

- ✓ Obtained and reviewed information and diagrams outlining the current public safety communications systems operated by LASD and supporting the transit safety and security operations. This included LASD and local police agencies that may respond to calls for service related to the bus or rail system.
- ✓ Compared the current communication system with the requirements outlined in the Metro Scope of Work for the LASD contract and noted areas of concern.
- ✓ Obtained response time performance information including call answering time, call handling time, dispatch time, and call transfer time (to another agency); and identified areas of concern.
- ✓ Evaluated actual call receipt, handling, dispatch and response times and compared to established goals and industry best practice standards.
- ✓ Evaluated current staffing, deployment, and operational approaches and determined what changes would be required to improve response time.
- ✓ Compared and evaluated the communications system with current industry best practices.
- ✓ Met with numerous LASD and Metro personnel to discuss aspects of the system that can be improved and ascertained where there are inefficiencies while taking into account personnel biases and where there exists skewed information.
- ✓ Developed conclusions, findings, and recommendations.

Our data collection and analysis efforts were targeted toward providing answers to the following questions outlined in the Request for Proposals:

1. Is the LASD dispatch system adequately working to minimize response time?
2. Is the response time meeting targeted goals?
3. What increase in manpower or changes in deployment would it take to reduce response time by 50% on emergency level calls?

## **Response to Incidents**

Responding to and handling incidents that occur within the transit system is one of the



key responsibilities of the LASD. As such, it is essential that the time required to answer, handle, dispatch resources, and respond to these incidents is tracked and reported correctly to provide an accurate picture of how long it takes to respond to these incidents.

**Finding 12: The reported LASD response time data indicate that response to incidents generally meets targeted goals, but the data do not provide an accurate picture of actual response times.**

Deputies arriving at calls for assistance related to buses signal that they have arrived on scene when they see the bus or are at the location where the call from the bus came. Even in situations wherein the bus is no longer at that location (primarily because operators keep the buses moving to maintain bus schedules), and even when the Deputy has not made contact with the bus operator, TSB's response time records show that the response time was finished. Thus, the amount of time in which calls for assistance begin to be resolved are systematically understated by TSB's official tabulations.

Additionally, response times are only tabulated from the time the call is dispatched to the officer to the time the officer says he or she has arrived on the scene. From the caller's perspective, response time should be the time from when the call to the LASD call center or bus operations center is made until the officer actually arrives on the scene. Sometimes there is a delay in transferring the call to the LASD dispatch center; other times, if there is no LASD unit available, the call is held in dispatch until a unit is available for response. All these factors lengthen the actual response time beyond that reported by the LASD.

Answering and responding to such calls requires a number of different steps or processes on the part of the responding law enforcement agency. These include:

- **Call Answering** – is the time it takes the call center to actually answer the call. The amount of time required to complete this depends on call taking personnel being available to answer the calls. In some call centers, when all call takers are busy, new calls are placed into a queue until a call taker is available to answer the call. LASD reports that they do not have a queuing system for emergency calls, nor do they measure the amount of time required to answer incoming calls.
- **Call Processing** – is the time it takes for the initial call taker to communicate with the person making the call to determine what type of incident they are reporting, the priority of the call, and the appropriate resources to respond to the reported incident. LASD reports they do not track the amount of time it takes to process incoming calls.
- **Dispatch Hold Time** – is the time a call may be placed in queue prior to dispatching patrol resources because there is not an appropriate patrol resource available to respond to this call. This is typically done based on priority of calls, with more urgent calls dispatched before less urgent calls. In many law enforcement agencies, the amount of dispatch hold times can be substantial





because all patrol resources are busy handling other calls. LASD does not track the amount of time calls are held prior to dispatch based on resource availability.

- **Dispatch Time** – is the amount of time required for a dispatcher to process and communicate the details of the call including location, type of incident, priority, and other pertinent details to the appropriate patrol resource. LASD does not track the amount of time required to dispatch calls.
- **Dispatch to Arrival Time** – is the amount of time required for the patrol resources dispatched to respond and travel to the scene of the incident once dispatched. The LASD does track the amount of time from dispatch to arrival, and reports this as total response time.

Metro has indicated it is interested in whether response time could be reduced by 50% for emergency calls. Response to actual emergencies could be reduced, but probably not by 50%. If the structure of the TSB is altered to a geographic structure, this may have some impact on response times since Deputies will have specific and often smaller geographic areas in which they work.

If collaboration with other law enforcement agencies in Metro jurisdiction is strengthened so that these agencies accept responsibility for responding to emergencies when TSB or other LASD personnel are not able to immediately respond, response times to these calls may be substantively shortened, providing that the dispatching process within Metro and TSB is strengthened as well.

Public perception is an important component of improving policing services, but reporting faster response times by using benchmarks that overstate the speed by which LASD is able to respond to incidents on the transit system will obfuscate areas of weakness and make real improvement harder to achieve. Simply claiming that response times should only be those times under the control of LASD field personnel ignores the importance of the total process time from call receipt to arrival of Deputies on the scene. It is acceptable to divide response times by individual segments (such as call processing time, dispatch delay time, and Deputy response time), but total response time must reflect the total amount of time it takes from the receipt of a call for service or assistance to a Deputy or law enforcement agent being physically present at the scene of the actual concern.

**Recommendation 12: Metro and TSB should consider response times to be the time from when the call is received to the time when the Deputy actually has contact at the incident (including all of the bulleted steps above) so that there is an accurate picture about how long it takes Deputies to arrive on the scene when a call has been received.**



## **Communications Center Facilities**

Like any law enforcement or transit function, the public safety communications function of the LASD TSB requires adequate space and facilities for the efficient and effective operation of the communications function.

**Finding 13: The Communications Center facilities are inadequate for effective receipt and dispatching of calls for service, and tracking unit location and availability.**

The current Communications Center facility site is cramped and not organized to be effective. There is an environment of disorder in the Communications Center at some times as employees try to multi-task fast moving situations and keep track of unit availability and location.

The TSB needs to move its communications center to a more adequate site and better organize it. Experience shows that disorder among communications personnel can impact the ability to process calls and dispatch field units promptly, though the current lack of sufficient data makes it difficult to prove that such delays are occurring in this instance.

**Recommendation 13: Metro should work with LASD to find expanded quarters for the TSB Communications Center so that there is sufficient workspace and structure for effective processing of calls for service and tracking of unit status and location.**

## **Reporting Trends in Incident Response Times**

As noted above, responding to incidents within the transit system is a key function of LASD. Tracking, reporting, and comparing trends in response times to these incidents is important to allow development of alternate deployment, staffing, or other operational strategies to improve response times.

**Finding 14: Analysis of response times for bus and rail calls is inadequate, and data is not presented in a manner that can be used for identifying ongoing issues for improvement.**

Currently, the Monthly Report only includes when dispatchers assign calls. Also, TSB does not consistently conduct month-to-month comparisons whereby patterns can be identified and progress in lowering response times ascertained. Additionally, as indicated above, reported bus response times are likely skewed because Deputies report when they arrive on the bus route as opposed to when they make contact with the bus operator.

Introducing consistent, monthly analysis of response times and improving the accuracy by which response times are measured will improve LASD's ability to ascertain what steps can be taken to further reduce response times. Particularly, LASD should begin to analyze and discuss response times at Intelligence-Led Policing (ILP) meetings, where they are not currently discussed.



***Recommendation 14: Metro should require LASD to amend the Monthly Report to include the actual time that calls are received and units arrive on scene, and ensure that a comparison of response times measured by calls received to responding units on scene is included in every Monthly Report and presented at every ILP meeting.***

### **Transfer of Emergency Calls**

As previously discussed in the “Requirements for Rail and Bus Operations” sections, Metro’s transit area – including all rail lines, bus lines, and stations – is too large for LASD to provide complete patrol and emergency response coverage as if that area were a municipality.

***Finding 15: TSB does not have standard procedures in place to transfer emergency calls for service to local police agencies.***

Instead of attempting to provide emergency call coverage for the entire transit area, TSB should focus its operations on problem solving and preventive policing if it is to have the greatest impact on crime on the transit system. Consequently, LASD and Metro will need to reach agreements with the local jurisdictions to provide local police agency response to emergency calls for bus and rail services passing through those jurisdictions. This will require protocols be in place to transfer the calls to local police dispatchers when it is clear that no TSB Deputy can make the response.

***Recommendation 15: Metro should require TSB to establish standard protocols for transferring emergency calls for service to local police agencies.***

### **Training of Transit Call Takers and Dispatchers**

As with any specialized function, call takers and dispatchers assigned to the TSB require specialized training.

***Finding 16: Transit call-takers and dispatchers receive inconsistent training and no formal training relating to transit operations.***

At present, there is no specific transit-related training for Deputies and law enforcement technicians assigned to call-taking and dispatch duties at command centers. There exists only some informal “in-house training” provided by personnel at the Rail Operations Center under the supervision of a senior Deputy.

While specific LASD dispatcher training does exist, it emphasizes elements that are more useful to dispatchers assigned to LASD stations and traditional municipal law enforcement rather than the Transit Operations Center. In some instances, particularly in the case of light duty officers, personnel receive little formal or informal training before being tasked to call-taking assignments.

A 6-month minimum tour of duty should be mandatory for all Deputies transferred to transit communications (including those on light duty). Furthermore, the LASD should



develop a policy and procedures manual for the TSB Communications Unit. Personnel assigned to any TSB transit communications should receive special training in transit operations and communications according to this manual.

***Recommendation 16: Metro should require LASD to develop a policy and procedure manual for TSB transit communications and require LASD to institute minimum training standards and special training for Deputies and technicians assigned to call taking and dispatch for transit operations.***

### **Use of Crime, Incident and Response Time Data for Deployment Analysis**

Many law enforcement agencies use a combination of crime, incident, and response to determine how to best use or deploy their sworn law enforcement resources. Often, this deployment analysis is used to focus these resources on areas and/or times when crime or incidents occur most frequently.

**Finding 17: TSB's deployment practices do not optimize response times and require consistent evaluation to determine whether additional changes can be made to reduce response times while maintaining cost-efficiency and officer safety.**

Response time data is not used for deployment purposes nor is it generally used for strategic assignments that would reduce response times to incidents. Police in jurisdictions in which bus incidents occur are not advised of occurrence patterns in real-time so that their patrol personnel are aware of the situations that result in calls for police assistance.

TSB should examine crime statistics by location to find "hotspots" for the purposes of deployment (which does not occur at present); determine whether single Deputies can be deployed on some patrols without compromising Deputy safety; and determine whether LASD can allocate sufficient, dedicated personnel to TSB to allow the cessation of "CARPing" Deputies to TSB, as these Deputies are not familiar with transit operations and are more likely to cause response time delays. Alternatively to eliminating "CARPing" to TSB, LASD can institute minimum training standards for Deputies on temporary or CARP assignment to TSB.

TSB must also be the expert transit center for ensuring that all area law enforcement agencies are aware of transit security and crime problems and tactics that can reduce crime. The more that the TSB becomes known as the "expert transit center" on these issues and shares information with patrol personnel in these jurisdictions, these jurisdictions will be more willing to assist the TSB in responding to incidents when they occur.

By carefully analyzing response patterns, officer deployments can be focused on areas that have repetitive problems that require a police response or indicate an on-going situation resulting in police response that can be resolved through strategic approach to removing the underlying cause of the situation.



***Recommendation 17: Metro should require LASD to conduct regular analysis to determine whether amending its deployment practices can help reduce incident response times.***



## **Management Oversight and Performance Metrics**

The contract amount for services from the LASD has ranged between \$65.9 million and \$83.0 million annually from FY 2009 through FY 2014. It is essential that Metro clearly define performance expectations for the LASD and use meaningful performance metrics to evaluate how well these expectations are being met. Performance metrics have been developed focusing on transit safety and security, the public's perception of safety and security, effective management of budgetary resources, and Metro's confidence, trust, and satisfaction with services provided.

In assessing management oversight and performance metrics, we:

- ✓ Obtained and reviewed policy and procedure manuals for transit community policing and Metro's plan and methodology for performance oversight of LASD.
- ✓ Identified how Metro currently provides performance oversight of the LASD contract, and reviewed documentation on the approach, frequency, and content of this oversight.
- ✓ Obtained data on LASD's performance on adopted metrics, evaluated the reliability of reported performance information, and determined the level of performance over the term of the contract.
- ✓ Reviewed the performance metrics used by Metro to evaluate LASD performance, evaluated them against current industry best practices, and identified different or additional performance metrics that should be incorporated into the contract.
- ✓ Developed conclusions, findings, and recommendations.

Our data collection and analysis efforts were targeted toward providing answers to the following questions outlined in the Request for Proposals:

1. Has Metro developed a plan and methodology for oversight of the performance under the contract?
2. What are the performance metrics (standards) by which Metro evaluates the performance of LASD? Should they be included in future contracts?
3. Has LASD historically (past 2 years) met the performance metrics, and what are the options for remedies or consequences for not meeting performance targets?
4. What additional metrics/standards should be placed in the contract to evaluate the performance of LASD?

## **Contract Performance Oversight**

Providing oversight of contract performance is essential to ensuring that the goods or services contracted for are provided, the quality of those goods and services are as defined in the contract, and the required outcome or deliverable is being provided. The contract amount with the LASD is substantial, over \$83 million annually. This contract is also very complex, with numerous requirements, expectations, and deliverables. This



contract is also for a service that is at the core of Metro's service – providing a safe and secure transit system. The quality of service provided has a major impact on the overall service provided by Metro, and how those services are perceived and accepted by its customers and patrons.

**Finding 18: Metro needs to strengthen and enhance its oversight of LASD contract performance.**

Metro has not developed a formal plan or methodology for oversight of the LASD's performance under the contract. There are four Metro staff under the Deputy Executive Officer for Safety and Security that perform some oversight of contract performance. Each of these staff have substantial other duties and responsibilities, and overseeing the LASD contract is a small part of those duties and responsibilities. As a result, there has been less oversight of the LASD contract than is required.

There has been limited formal monitoring of contract performance under the current contract because of a lack of staff dedicated to this activity. While Metro management has specified specific requirements in the contract and reinforced some of those requirements in regular discussions with TSB management, actual compliance with contract requirements has not been thoroughly monitored and enforced.

Contract oversight staff should also conduct a thorough review of all invoices submitted to Metro by the contracting agency and ensure that costs listed are appropriate and match performance accomplishments. This need not be a large staff but should be one that has sufficient personnel assigned to ensure that contract requirements are being met. This staff should also oversee the collection of data on performance measures, such as system user perception surveys and related data sets.

**Recommendation 18: Metro should develop a comprehensive plan and methodology for oversight of LASD's performance under the contract and develop a staffing plan for implementing the contract oversight plan.**

**LASD Performance on Established Indicators**

A number of performance indicators were established for the LASD contract with the annual renewal beginning with FY 2012. The metrics were grouped into the categories of transit safety and security; the public's perception of safety and security; effectively managing budgetary resources; and Metro's confidence, trust, and satisfaction. Targets for each of the indicators were also established.

**Finding 19: LASD has not met many of the targets for performance indicators established including crime reduction, continuity of staff, fare enforcement saturation, and activity rates.**

The following exhibit shows the established performance indicators, the target for each, the actual performance (if available), and comments for each. As this exhibit shows, LASD did not meet many of the established performance indicator targets. Both Part I (Violent Crime) and Part II (Other Crime) reported crime increased substantially rather than being reduced by the target amount of 8 percent. Saturation rates for fare



enforcement also fell short of targeted levels. Other performance indicators were not measured, including the public's perception of safety on the system, and indicators related to Metro's confidence, trust and satisfaction. The LASD did meet most of the targets related to submittal of reports or data.

<b>Exhibit 1</b> <b>Transit Services Bureau Performance Indicators</b> <b>Comparison of Performance Targets and Actuals</b>			
Indicator	Target	Actual	Comments
Transit Safety and Security			
Annual Crimes Committed			
Part I (Violent Crime)	8% Reduction	28% Increase (2012), 16.5% Increase (2013)	Reported Part I Crime has increased rather than been reduced.
Part II (Other Crime)	8% Reduction	8.2% Increase (2012), 8.5% Increase (2013)	Reported Part II Crime has increased rather than been reduced.
Response to Service Calls	Within 30 Minutes	Unknown	TSB does not accurately measure response time to calls for service.
Fare Evasion	2%	Unknown	Neither Metro nor TSB have developed a reliable method for measuring fare evasion.
Annual Saturation Rate	10%	TSB reports saturation rates between 8% and 10% Metro calculated saturation rates between 1% and 7%.	Metro calculates the saturation rate using the TAP data, which should be accurate.
Security Assistants Fare Checks	90%	Unknown	Percentage of time SA's spent doing fare checks not tracked.
Public's Perception of Safety and Security			
Visibility of LASD Personnel	90%	Unknown	A survey to identify the public's perception of safety and security was never developed or administered.
Visibility Vehicle Patrols	90%	Unknown	
Daily In-Service (No Bust Shifts or shifts implemented as planned)	95%	Unknown	
Participation Community Meetings	1 Meeting	Unknown	No reporting
Collaborative Partnership Project	1 Project	Unknown	No reporting
Patron Compliments	50%	Unknown	Target of 50% unclear, 96 Commendations were received in





<b>Exhibit 1</b>			
<b>Transit Services Bureau Performance Indicators</b>			
<b>Comparison of Performance Targets and Actuals</b>			
<b>Indicator</b>	<b>Target</b>	<b>Actual</b>	<b>Comments</b>
			2012.
Patron Complaints	40%	Unknown	Target of 40% is unclear, 178 Personnel Complaints and 31 Service Complaints were received in 2012.
<b>Effectively Manage Budgetary Resources</b>			
Compliance with Contract Minutes	98%	89.6 to 110% for Sworn Staff	Much wider variance than target
Annual Audits of Records	2	0	No annual audits of records have been performed.
<b>Metro's Confidence, Trust, and Satisfaction</b>			
Metro Satisfaction with Service	95% to 100%	Unknown	No tracking or reporting on Metro satisfaction.
Stability of Personnel	90%	Unknown	No tracking or reporting on the stability of personnel.
Daily CARPing	10%	Unknown	CARPing personnel not reported.
Submittal of Reports/Data			
Crime Statistics	100%	100%	Included in Monthly Reports
Major Incident Reports	100%	100%	
Crime Trends and Analysis	100%	100%	
Threat Assessments	100%	100%	
Area Crime Analysis	100%	100%	
Enforcement Activities	100%	100%	
Transit Vehicle Boardings	100%	100%	
Fare Inspections	100%	100%	
Daily Activity Reports	100%	100%	
Crime Reports by Mode	100%	100%	
Invoice Support	100%	0%	Requested support for invoices, including billing detail, not provided.

The following exhibit provides a list of potential performance indicators as a starting point for discussions between Metro and LASD on performance tracking and reporting under a new contract.



Exhibit 2		
Recommended Potential Performance Indicators		
Indicator	Data Source	Comments
Metro Patrons / Riders Perceptions of Safety and LASD Service		
Percentage of Metro Patrons / Riders who feel safe on the system: During the Daytime During the Nighttime	Annual or Biannual safety and security survey of Metro Patrons / Riders.	Community surveys have become very common among law enforcement agencies to gauge the level of fear of crime, as well as the level of satisfaction with law enforcement services provided.
Percent of Metro Patrons / Riders who feel likely / unlikely to be crime victims on the Metro system.		
Percent Favorable Impression of LASD Transit Services Bureau		
Service Rating - Follow-up		
Service Rating - Problem Solving		
Service Rating - Response Time		
Service Rating - Service Quality		
Service Rating - Fairness		
Service Rating - Helpfulness		
Crime on the Metro System		
Part I Violent Crime (Homicide, Rape, Aggravated Assault, Robbery)	Crime as reported to the FBI Uniform Crime Reporting System, including both crime responded to and handled by the LASD and by municipal law enforcement agencies.	Crime should be tracked and reported by line, with trends tracked over time to identify areas of concern or requiring additional focus.
Part I Violent Crimes per 100,000 Average Daily Passengers	Total Part I Violent Crimes divided by the average number of daily passengers on the line, multiplied by 100,000.	This indicator will allow comparison as the transit system and ridership continues to expand. This ratio should also be tracked and reported by line over time to identify areas of concern or requiring additional focus.
Part I Property Crime (Burglary, Theft, Grand Theft Auto, and Arson)	Crime as reported to the FBI Uniform Crime Reporting System, including both crime responded to and handled by the LASD and by municipal law enforcement agencies.	Crime should be tracked and reported by line, with trends tracked over time to identify areas of concern or requiring additional focus.
Part I Property Crimes per 100,000 Average Daily Passengers	Total Part I Property Crimes divided by the average number of daily passengers on the line, multiplied by 100,000.	This indicator will allow comparison as the transit system and ridership continues to expand. This ratio should also be tracked and reported by line over time to identify areas of concern or requiring additional focus.
Part II Crime	Crime as reported to the FBI Uniform Crime Reporting System, including both crime	Crime should be tracked and reported by line, with trends tracked over time to identify



Exhibit 2		
Recommended Potential Performance Indicators		
Indicator	Data Source	Comments
	responded to and handled by the LASD and by municipal law enforcement agencies.	areas of concern or requiring additional focus.
Emergency Call Taking, Dispatch and Response		
Time to Answer 911 Calls (Seconds)	Call center and Computer Aided Dispatch system software.	Each of these are standard performance indicators that should be tracked using basic call center and Computer Aided Dispatch Software. Many of these are not currently tracked nor reported by TSB or LASD. If this is due to a lack of capability that capability should be developed and required under the contract.
Percent Calls Dropped		
Call Processing Time (Minutes)		
Emergency Dispatch Time (Minutes)		
Priority Dispatch Time (Minutes)		
Routine Dispatch Time (Minutes)		
Emergency Patrol Response Time (Minutes)		
Priority Patrol Response Time (Minutes)		
Routine Patrol Response Time (Minutes)		
Criminal Investigations		
Violent Crime Clearance Rate	FBI Uniform Crime Reporting	This provides an indication of how effective criminal investigators are at solving crime on the Metro system.
Violent Crimes per Investigator	Number of violent crimes reported divided by the number of investigators assigned to investigate them.	This provides an indication of the level of investigative workload for TSB investigators.
Property Crime Clearance Rate	FBI Uniform Crime Reporting	This provides an indication of how effective criminal investigators are at solving crime on the Metro system.
Property Crimes per Investigator	Number of property crimes reported divided by the number of investigators assigned to investigate them.	This provides an indication of the level of investigative workload for TSB investigators.
Line and Support Staffing		
Percentage of Line Sworn Staff Time Provided by Dedicated TSB Staff	Staffing Reports	Will show the extent to which contracted for services are being provided by staff with appropriate transit training and experience.
Percentage of Sworn Support Staff Time Provided by Dedicated TSB Staff	Staffing Reports	Will show the extent to which contracted for services are being provided by staff with appropriate transit training and experience.
Percentage of Targeted Line Staff Provided each Month	Staffing Reports	Will show extent to which consistent staffing is provided.
Metro Patron / Riders Commendations and Complaints, and Internal Affairs Investigations		
Number of Commendations	LASD Service Commendation and Complaint Tracking System	Provides an indication of the number of times Metro patrons or riders are pleased with the



<b>Exhibit 2</b>		
<b>Recommended Potential Performance Indicators</b>		
<b>Indicator</b>	<b>Data Source</b>	<b>Comments</b>
		actions of the TSB personnel.
Commendations per 100 TSB Staff		Provides for a comparison of performance over time with changes in staffing levels.
Number of Complaints Against Sworn Officers		Provides an indication of the number of times Metro patrons or riders complain about the actions of the TSB personnel.
Complaints per 100 Sworn Officers		Provides for a comparison of performance over time with changes in staffing levels.
Number of Complaints against Security Assistants		Provides an indication of the number of times Metro patrons or riders complain about the actions of the TSB personnel.
Complaints per 100 Security Assistants		Provides for a comparison of performance over time with changes in staffing levels.
Number of Internal Affairs Cases	Internal Affairs	Provides an indication of the number of serious allegations against TSB personnel.
Internal Affairs Cases per 100 Assigned Personnel		Provides for a comparison of performance over time with changes in staffing levels.

**Recommendation 19: Metro and LASD should work together to develop and adopt a comprehensive set of performance indicators, and ensure that performance on these indicators is periodically measured and reported to both Metro Executives and the Metro Board.**

### **Crime Reporting**

The Uniform Crime Reports (UCR) are official data on crime in the United States, published by the Federal Bureau of Investigation (FBI). UCR is a nationwide, cooperative statistical effort of law enforcement agencies voluntarily reporting data on crimes. Crime statistics are compiled from UCR data and published annually by the FBI in the Crime in the United States report series.

The Uniform Crime Reports program began in 1930, and since then has become an important source of crime information for law enforcement, policymakers, scholars, and the media. To make the crime reporting useful and comparable a standard set of definitions of crime have been developed for reporting. These standards should be used for crime reporting to avoid confusion and disparate crime reporting.



In addition, in order for Metro to have a clear understanding of the total amount of crime on the system, it is important that all crime occurring within the Metro system be reported.

**Finding 20: Crime on the Metro system is underreported by not conforming with Uniform Crime Reporting (UCR) standards, nor including crimes responded to and handled by other law enforcement agencies.**

As the following exhibit shows, the crime reported to Metro for the transit system differs from the crime reported under the FBI's UCR program for each of the contract years. The primary differences in reporting are for the crimes of aggravated assault and theft. For these crimes, the UCR requires that multiple victims be counted as separate crimes. The LASD internal crime reporting counts these crimes with multiple victims as one crime.

Over the five-year contract period, the difference in crime reporting amounts to only about 6% fewer crimes being reporting to Metro as reported to the FBI UCR. However, when a key objective of Metro is to reduce crime on the Metro system this difference can be meaningful.

Crime that occurs on the Metro system is also underreported by not including crime that is responded to and handled by other law enforcement agencies. Municipal law enforcement agencies respond to and handle an unknown number of crimes that occur within the Metro system. The LASD may be informed of these crimes, and often may receive a copy of the crime report, but these crimes are not added to the crimes reported to Metro as having occurred within the system. Only crimes that are responded to and handled by the LASD are reported.



<b>Exhibit 3</b> <b>Crime Reporting Comparison</b> <b>Crime Reported to Metro Versus Crime Reported to the FBI</b>									
Transit Services Bureau Crime Statistics									
Year	Homicide	Rape	Agg Assault	Robbery	Burglary	Theft	GTA	Arson	Totals
2009	0	4	122	281	13	516	136	5	1,077
2010	1	1	189	286	11	550	150	1	1,189
2011	2	3	199	255	12	555	119	5	1,150
2012	1	4	239	374	18	749	94	1	1,480
2013	0	2	232	401	16	979	108	4	1,742
Totals	4	14	981	1,597	70	3,349	607	16	6,638
FBI Uniform Crime Reporting (UCR) Crime Statistics									
Year	Homicide	Rape	Agg Assault	Robbery	Burglary	Theft	GTA	Arson	Totals
2009	0	5	160	285	15	528	126	4	1,123
2010	2	1	237	292	12	583	144	3	1,274
2011	2	3	237	261	13	576	123	5	1,220
2012	1	4	283	380	20	787	89	1	1,565
2013	0	2	280	407	15	1,008	107	5	1,824
Totals	5	15	1,197	1,625	75	3,482	589	18	7,006
Difference									
Year	Homicide	Rape	Agg Assault	Robbery	Burglary	Theft	GTA	Arson	Totals
2009	0	-1	-38	-4	-2	-12	10	1	-46
2010	-1	0	-48	-6	-1	-33	6	-2	-85
2011	0	0	-38	-6	-1	-21	-4	0	-70
2012	0	0	-44	-6	-2	-38	5	0	-85
2013	0	0	-48	-6	1	-29	1	-1	-82
Totals	-1	-1	-216	-28	-5	-133	18	-2	-368
Percentage Difference									
Year	Homicide	Rape	Agg Assault	Robbery	Burglary	Theft	GTA	Arson	Totals
2009	0%	-25%	-31%	-1%	-15%	-2%	7%	20%	-4%
2010	-100%	0%	-25%	-2%	-9%	-6%	4%	-200%	-7%
2011	0%	0%	-19%	-2%	-8%	-4%	-3%	0%	-6%
2012	0%	0%	-18%	-2%	-11%	-5%	5%	0%	-6%
2013	0%	0%	-21%	-1%	6%	-3%	1%	-25%	-5%
Totals	-25%	-7%	-22%	-2%	-7%	-4%	3%	-13%	-6%
Sources: TSB Crime Statistics as reported in Monthly reports to Metro. UCR Crime Statistics as reported to the FBI UCR by the LASD									

**Recommendation 20: Metro should require LASD to revise its approach to reporting crime on the Metro system to conform with the FBI's Uniform Crime Reporting standards and to include crime responded to and handled by municipal law enforcement agencies.**



## **Contract Penalties for Non-Performance**

Penalty clauses in contracts allow the contracting agency to collect financial penalties if the contractor does not follow through on the various promises or provisions made in the contract. Such clauses provide a mechanism for encouraging or enforcing compliance with the contract terms.

### **Finding 21: The current contract with LASD does not include provisions for penalties nor incentives based on actual performance.**

The LASD has not met some of the key requirements of the contract for services. For example, the contract specifically requires that the LASD develop an annual Transit Community Policing Plan to direct the services provided under the contract.

Such a plan has not been developed during the entire 5-year contract term. As discussed above, the lack of such a plan has likely had a substantial negative impact on the quality of service provided under the contract, as well as the focus and effectiveness of those services. Under the current contract, there is no consequence to the LASD for not meeting this requirement, or any of the other critical elements of the contract.

For the new contract between Metro and the LASD, elements of the contract that are essential to the effective delivery of law enforcement services should be identified and penalties for non-performance defined. Metro should also consider tying specific penalties, as well as potential incentives, to specific performance indicators included in the contract.

The current contract staffing requirements are not focused on the number of TSB personnel actually at work during various periods of the day but rather on the number of hours provided from both the TSB or from other units in the LASD. This results in, among other things, substantial CARPing (where Deputies from other units are used to fill in shift vacancies due to an absence of TSB personnel) of personnel who are often untrained in the requirements of the transit policing responsibility and related activities.

Simply relying on the hours of service rendered is not a sufficient indicator of the quality of service being delivered. A more comprehensive matrix of service requirements must be developed and used as the core measure of service value for the money being expended. There should be penalties for use of CARPing personnel. Other important measurements of performance include public perceptions regarding fear on the transit system, public and Metro staff perception of police responsiveness, courtesy and professionalism, and perception of disorder in the transit system.

The contract should contain a measure of the actual number of personnel assigned to the TSB. Personnel assigned as CARPing should be billed to Metro at a lower rate than those permanently assigned to the TSB. Since CARPing personnel are often not trained in transit policing strategy, tactics, and priorities, the contract should be reimbursed at a lesser rate when such Deputies are utilized to provide service on the system.

**Recommendation 21: Metro should identify specific critical elements of the contract with LASD that are essential and define specific penalties to be imposed if those essential elements are not adequately provided by LASD. Metro should**



also consider defining specific incentives for exceeding certain critical performance metrics.





## **Reports and Analyses**

Intelligence and information led policing has become an essential approach to providing services targeted at security risks, issues, and incidents in order to take full advantage of security resources available. Having the right information at the right time is critical.

Metro has substantial information available on both their bus and rail operations that could be useful in targeting and focusing LASD safety and security efforts. For example, Metro's Advanced Transportation Management System (ATMS) has real-time information on each bus' location and number of passengers. It also provides audio monitoring capability and voice and text communications capability with the bus operator.

ATMS can also be used to identify and communicate fare compliance issues. Both ATMS and the Metro SmartDrive system provide high quality video of both the bus interior and street views. The Transit Access Pass (TAP) Program and support system also provide valuable information, including origin and destination information. If fully accessible, these systems could provide substantial assistance to the LASD safety and security efforts. LASD also requires information on Metro facilities and vehicles to support potential tactical operations.

Metro needs real-time information on LASD operations to ensure services are being provided in a coordinated and meaningful way.

In assessing the use of reports and analysis, we:

- ✓ Identified current information exchanged between Metro and LASD and the method for the exchange of that information.
- ✓ Evaluated effectiveness of current information exchange approaches and identified obstacles to improved information sharing.
- ✓ Evaluated the LASD's access and use of key Metro operational systems including ATMS, SmartDrive, and TAP to determine if these resources are being appropriately used and identified potential improvements in their use.
- ✓ Identified potential improvements in the use and exchange of information between the LASD and Metro.
- ✓ Identified potential improvements in the approach or automation of LASD information management and systems (e.g., automation of the citation issuance process and electronic integration with TAP and Transit Court.)
- ✓ Identified LASD needs for information to support its security and anti-terrorism responsibilities and determined if this information has been provided or is available to LASD.
- ✓ Identified additional information and reporting that would assist Metro management in overseeing LASD contract services or improving Metro or LASD operations.
- ✓ Developed conclusions, findings and recommendations.



Our data collection and analysis efforts were targeted toward providing answers to the following questions outlined in the Request for Proposals:

1. Is information and reports provided to Metro software compatible, timely, relevant, reliable, useful, and accessible by Metro (such as on a shared platform)?
2. Does LASD have information from Metro to perform its security and anti-terrorism responsibilities such as blue prints of rail stations and location of vents in facilities?
3. Is there any additional information or reports that Metro management needs?

### **Bus Operations Control (BOC) and the Advanced Transportation Management System (ATMS)**

The Bus Operations Center (BOC) is responsible for managing and directing the activities of the bus fleet in the field. BOC accomplishes this primarily through the use of the Advanced Transportation Management System (ATMS). ATMS is an integrated fleet management system that combines mobile voice and data communications, computer aided dispatch (CAD), automatic voice annunciation (AVA), and automated vehicle location (AVL) to provide users with tools to manage Metro's bus fleet. The system also includes automatic passenger counting to provide data for required reporting, and to analyze the actual daily performance of the bus system compared to the scheduled daily operation.

The ATMS relies on global positioning system (GPS) satellite navigation and communication technologies to track, manage and dispatch buses. The system can be used to pinpoint the location of a specific bus; respond to an emergency situation; dispatch LASD personnel, field maintenance, or tow trucks; or notify passengers of a delay.

**Finding 22: LASD personnel in the BOC can directly dispatch LASD resources, and communicate directly with both bus operators and LASD dispatched personnel. This direct assignment of LASD personnel to the BOC has improved coordination and communication, and reduced call processing time when law enforcement resources are needed to respond to bus incidents.**

LASD has direct access to ATMS. LASD personnel are assigned an ATMS workstation in the BOC, and have direct communications capability with the buses and LASD communications. LASD personnel become involved when the bus operator activates a silent alarm from the bus, or requests assistance from law enforcement. LASD personnel in the BOC act as a direct bridge between the BOC, buses in the field, and LASD communications and dispatch.

**Recommendation 22: Metro and LASD should continue assigning LASD personnel in the BOC who can directly dispatch LASD resources, and can directly communicate with both bus operators and LASD dispatched personnel.**



### **Rail Operations Center (ROC)**

The Metro Rail Operations Center (ROC) is responsible for monitoring and controlling the operations of all Metro rail lines. This is accomplished through rail operators and video monitoring of the rail lines and stations. Issues and incidents on the rail lines and in the stations are identified by ROC personnel and relayed to LASD if law enforcement resources and response are needed.

**Finding 23: Communication and coordination between ROC and LASD resources is indirect and through the telephone resulting in potential loss of critical information and delays in response.**

Currently, both the rail system operators/video monitors and the LASD communications center are located within the same building at the Rail Operations Center. However, the two operations are on separate floors of the building. As a result, they must communicate and coordinate information about incidents and responses through the telephone. This can result in loss of critical information and delays in responding to these incidents.

The co-location of LASD personnel in the Bus Operations Center serves as an effective model for improving communication and coordination between the rail operations and the LASD.

**Recommendation 23: Metro and LASD should work together to co-locate LASD personnel within rail operations with the capability to communicate directly with both rail operations and LASD dispatched personnel consistent with the approach used in the Bus Operations Center.**

### **Access to Metro Video Information**

The Metro transit system is well covered by video cameras with recording capabilities. This includes the rail stations, rail cars, bus stations, and buses. Many of the video cameras are monitored on an ongoing basis, while others, such as those on the buses, record what the cameras capture. This recorded video is available to appropriate Metro personnel and to LASD Deputies and investigators.

**Finding 24: LASD personnel are provided reasonable access to video recorded throughout the Metro system to support their law enforcement and investigative needs.**

The coverage of the Metro system is such that it is very likely that a crime occurring within the system will be captured on video. LASD personnel are able to obtain copies of station and on-board video from Metro CCTV and DVR systems to support their investigative functions.

**Recommendation 24: Metro and LASD should continue to work together to improve the coverage of the Metro system with video systems and further expedite the process for retrieval of requested video recordings.**



## **Access to Mobile Data and Applications**

With the implementation of the TAP ticketing system LASD personnel had to move from verifying paper fare cards or tickets to verifying fares recorded on the electronic TAP cards purchased by riders. This was accomplished by developing a mobile phone validator that each LASD Deputy or security assistant carries and uses to determine and validate individual rider's TAP cards.

### **Finding 25: The current mobile phone validator used by LASD personnel to check TAP fares is inadequate and has limited functionality.**

The mobile phone validator initially developed, and currently in use, is not a smart phone and has no potential for other applications or uses. The mobile phone in use is a basic phone with one special application developed specifically to read and validate TAP cards. While the phone has been functional, it is slow, highly prone to errors in reading TAP cards, and has been a point of some frustration to both the LASD personnel and Metro staff.

TAP Program staff is currently in the process of designing and acquiring a new mobile phone validator. The platform for this new mobile phone validator would be a true smart phone (Either Android or Apple IOS Operating System). The new smart phone design would allow much more functional use of the mobile phone validator for checking and validating TAP fares. In addition, it provides substantial potential for development of additional capabilities and applications that would improve the effectiveness of LASD personnel in the field. The following are three additional potential uses of the new Mobile Phone Validator smart phone capabilities.

- **Citation Issuance and Tracking** – LASD personnel currently use a paper system to issue citations to Metro patrons with either fare or code of conduct violations. This paper system does not allow them to quickly check to see if the person being cited has a past citation history, which could potentially influence the citation received or other action taken. The paper citation process also requires these paper citations to be manually entered into the citation and transit court systems. This results in delays in having information available in transit court, as well as the cost of manually entering the information. A smart phone application could be developed to automate the citation issuance process, including checking for prior citations, automatically uploading the citation information, and printing the citation for the patron.
- **Checking for Wants or Warrants** – Checking individuals within the transit system to see if they have outstanding warrants is a routine function of the LASD Deputies assigned to TSB. The current approach is to use the radio to call TSB Communications and have them run the individual(s) through the system for wants and warrants. This can be time consuming and inefficient. A smart phone application could potentially be developed to allow Deputies to access the warrant system directly and run the checks themselves. This would be consistent with the approach many agencies, including LASD use through Mobile Data Terminals installed in patrol vehicles.



- **Critical Information** – LASD personnel need and use critical information on a routine basis such as transit system maps, station layouts, policies and procedures, etc. It also includes dynamic information such as current issues and concerns, or individuals to be on the look out for (BOLO alerts). Currently, none of this information is available in an electronic or mobile format. A smart phone application could potentially be developed to allow Deputies ready access to critical information.

**Recommendation 25: The Metro TAP Program, Safety and Security, and LASD should work together to develop new applications and capabilities for the new mobile phone validator including citation issuance, checking for wants and warrants, and providing critical information.**

### **Information on Metro Facilities for Tactical Response**

The Metro rail and bus facilities are considered to be critical infrastructure as defined by the U.S. Department of Homeland Security. Critical infrastructure is defined as "systems and assets, whether physical or virtual, so vital to the United States that the incapacity or destruction of such systems and assets would have a debilitating impact on security, national economic security, national public health or safety, or any combination of those matters."

The Metro transit system is at the top of the list of high-risk critical infrastructure. This is because this infrastructure is both vulnerable and essential. A potential attack on parts of the Metro transit system could result in mass casualties. The number and scale of past attacks on other transit systems throughout the world underscores this fact.

A tactical response involving LASD's Special Enforcement Bureau (LASD's SWAT equivalent) would be required in the event any type of critical incident occurs within the rail system or at any of Metro's transit facilities. Having accurate and up to date information on the layout of Metro facilities would be essential to planning and executing an effective tactical response.

**Finding 26: LASD personnel do not have adequate access to information on the layout of Metro facilities (blueprints, etc.) to facilitate tactical response to critical incidents.**

We inquired with the three units of the LASD that would be part of a tactical response if they had information on the layout of Metro facilities needed to facilitate a tactical response to critical incidents. This included the TSB line personnel, TSB Threat Interdiction Unit (TIU), and Special Enforcement Bureau (SEB) personnel. None of these units had ready access to the needed information.

The TSB line personnel showed us and provided an overview of information contained within the Public Address (PA) panel at each rail station, which they had access to. However, this panel would very likely not be accessible during a tactical incident, and the information contained within the panel would be very difficult to communicate to others. Line personnel also told us that they often had difficulty finding specific



locations within Metro facilities, most often rail line vents that are alarmed and the alarm had sounded. Response to these alarms was often delayed due to having to locate the vent outlets, or track down Metro personnel for assistance.

The TSB Threat Interdiction Unit was able to produce blueprints of the rail stations, but these were not up to date, nor were they readily accessible. They had no information on other Metro facilities such as bus divisions or maintenance facilities. The Special Enforcement Bureau had no information on any Metro facilities. All three groups said they would be dependent on Metro personnel to provide the needed information on the layout of Metro facilities.

**Recommendation 26: Metro and LASD should work together to identify the specific needs and requirements for information on the layout of Metro facilities (blueprints, etc.) to facilitate tactical response to critical incidents for LASD. An approach to provide this information in an electronic format that is up to date and easily accessible should be developed.**



## **Complaints**

Complaints can provide meaningful insight into how well services are provided and accepted by Metro passengers; and how well LASD personnel are trained, managed and supervised.

In reviewing complaints and handling of complaints, we:

- ✓ Obtained and reviewed LASD policies and procedures for taking and recording, investigating, and resolving customer complaints.
- ✓ Compared current LASD complaint handling procedures with industry best practices.
- ✓ Reviewed records of complaints made, investigations, and dispositions to determine if complaints are being handled consistently and appropriately.
- ✓ Conducted a trend analysis of complaints during the contract period to determine what the trends are by type of complaint.
- ✓ Developed conclusions, findings and recommendations.

Our data collection and analysis efforts were targeted toward providing answers to the following questions outlined in the Request for Proposals:

1. Are community complaints against the LASD handled consistently and in accordance with appropriate policies and procedures?
2. What is the trend of complaints by category?

## **Complaints About LASD Personnel or Service**

Metro customers and patrons that are dissatisfied with their treatment or interaction with LASD personnel, or with the service provided, can make a formal complaint, or provide service comments. Metro customers and patrons can also make formal commendations for the service they receive from the LASD.

LASD policy states that public trust is vital to its mission, and rests on Department responsiveness to community needs and expectations. To foster public confidence in the Department and to promote constructive communication, complaints must be received with equal professional interest and courtesy, and given appropriate supervisory attention. In addition, the California State Penal Code mandates that each department or agency that employs peace officers shall establish a procedure to investigate complaints by members of the public against the personnel of these departments or agencies, and shall make a written description of the procedure available to the public.

Complaints can be made in a variety of ways, including in person, through the mail, by telephone, or via email. Each complaint must be investigated and a formal conclusion or disposition reached. The policies and procedures for handling and investigation of these complaints are defined by the LASD **Service Comment Report Handbook, Handling Public Complaints** (SCR Handbook). This handbook defines specific



requirements and steps for receiving complaints, conducting a service review of each complaint, and adjudicating and reaching a disposition for each complaint.

Complaints received are categorized as either personnel or service complaints. Personnel complaints are external allegations of misconduct, either a violation of law or Department policy, against any member of the Department. Service complaints are an external communication of dissatisfaction with Department service, procedure or practice, not involving employee misconduct. Service complaints provide valuable feedback about the Department's effectiveness in identifying and meeting community needs.

### **Personnel Complaints and Allegations**

During the five-year contract period a total of 959 personnel complaints were received from customers or patrons of Metro. The following exhibit shows these complaints by year and the trend in the number of total personnel complaints received.



Personnel complaints are categorized by specific allegations made against LASD personnel. The following are the allegation categories used:

- Criminal Conduct
- Discourtesy
- Dishonesty
- Improper Tactics





- Improper Detention, Search or Arrest
- Neglect of Duty
- Operation of Vehicles
- Off-Duty Conduct
- Harassment
- Discrimination
- Other
- Unreasonable Force

Each personnel complaint can include multiple allegations. For example, one complaint could include multiple allegations of discourtesy; improper detention, search, and arrest; and unreasonable force. Other complaints could include allegations of discourtesy and harassment.

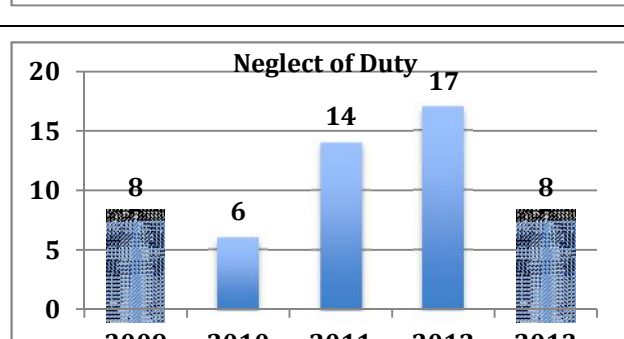
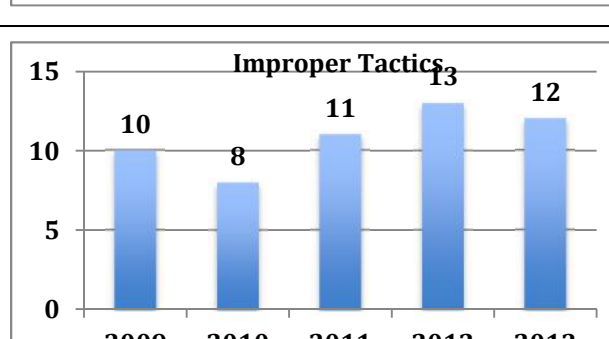
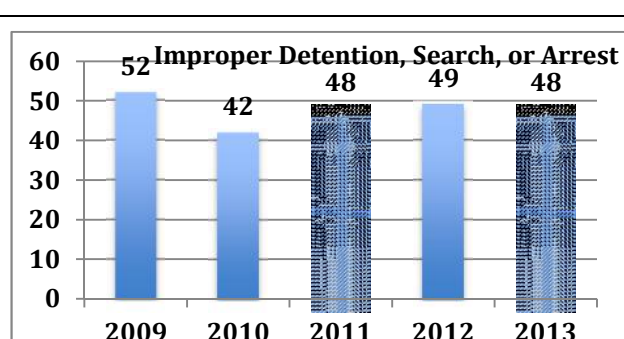
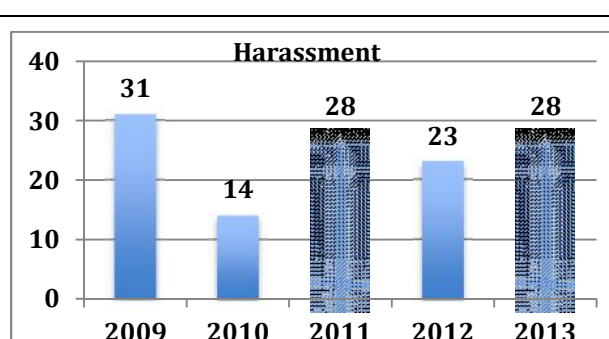
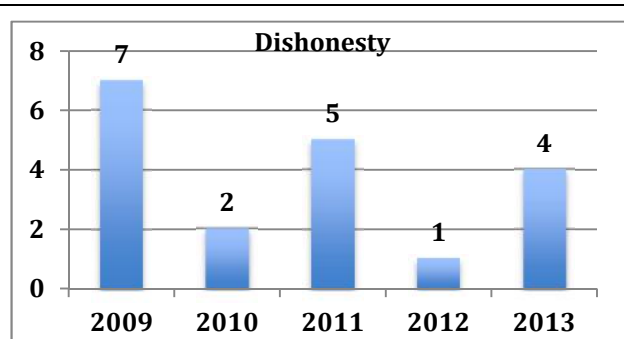
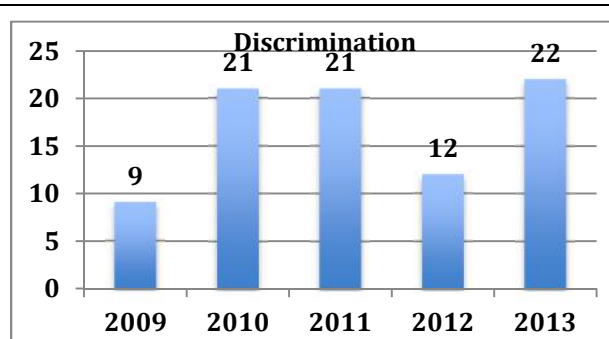
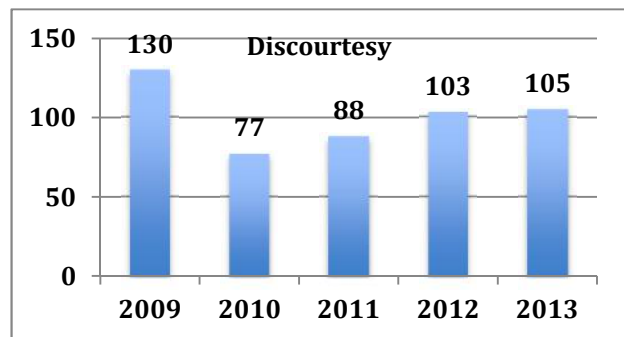
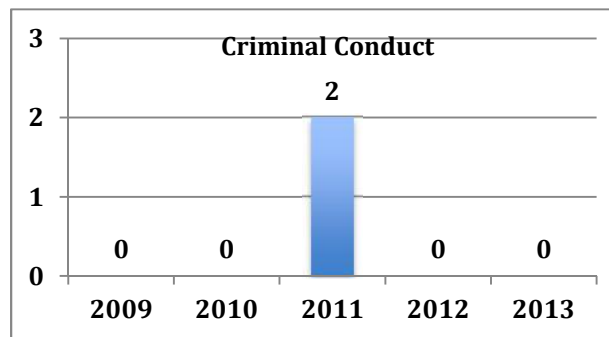
The 959 Personnel complaints received totaled 1,424 specific allegations for the period reviewed. The following exhibit shows the number of each type of allegation made during each of the five contract years.

<b>Exhibit 5</b>							
<b>Allegations Included in Personnel Complaints by Year</b>							
	<b>Allegation Type</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>Totals</b>
	Criminal Conduct	0	0	2	0	0	2
	Discourtesy	130	77	88	103	105	503
	Discrimination	9	21	21	12	22	85
	Dishonesty	7	2	5	1	4	19
	Harassment	31	14	28	23	28	124
	Improper Detention Search Arrest	52	42	48	49	48	239
	Improper Tactics	10	8	11	13	12	54
	Neglect of Duty	8	6	14	17	8	53
	Off Duty Conduct	2	5	5	1	0	13
	Operation of a Vehicle	10	2	7	12	3	34
	Other	27	23	37	40	24	151
	Unreasonable Force	27	25	41	32	22	147
	<b>Totals</b>	<b>313</b>	<b>225</b>	<b>307</b>	<b>303</b>	<b>276</b>	<b>1,424</b>
Source: BCA analysis of LASD Service Comment (Complaint) reports for the Transit Services Bureau, Calendar Years 2009 to 2013.							

The following exhibit shows the number and trend for each type of allegation made during each of the five contract years in graphs.

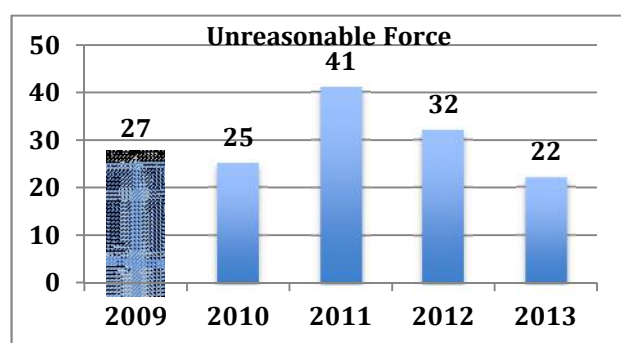
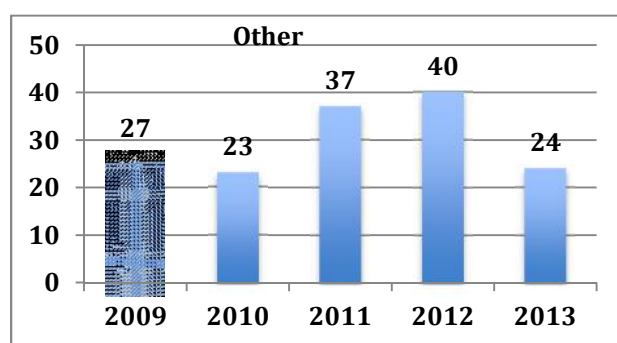
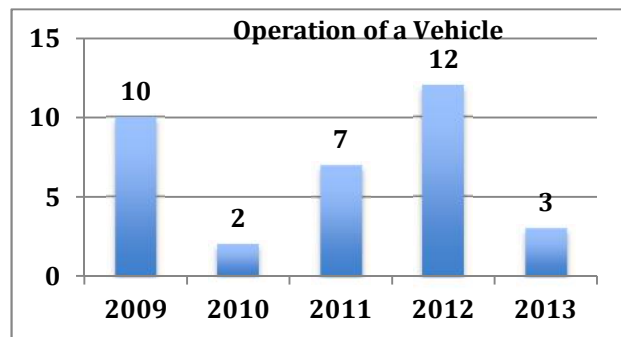
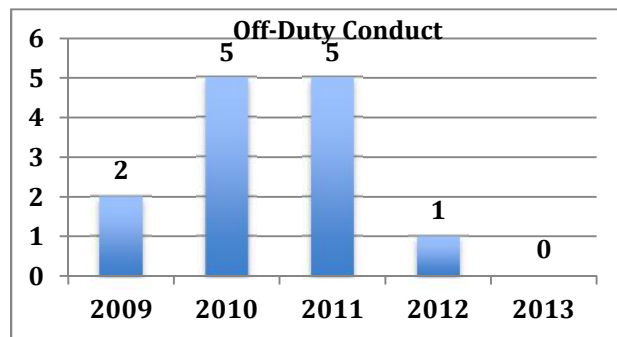


**Exhibit 6**  
**Allegations Included in Personnel Complaints by Year**





**Exhibit 6**  
**Allegations Included in Personnel Complaints by Year**



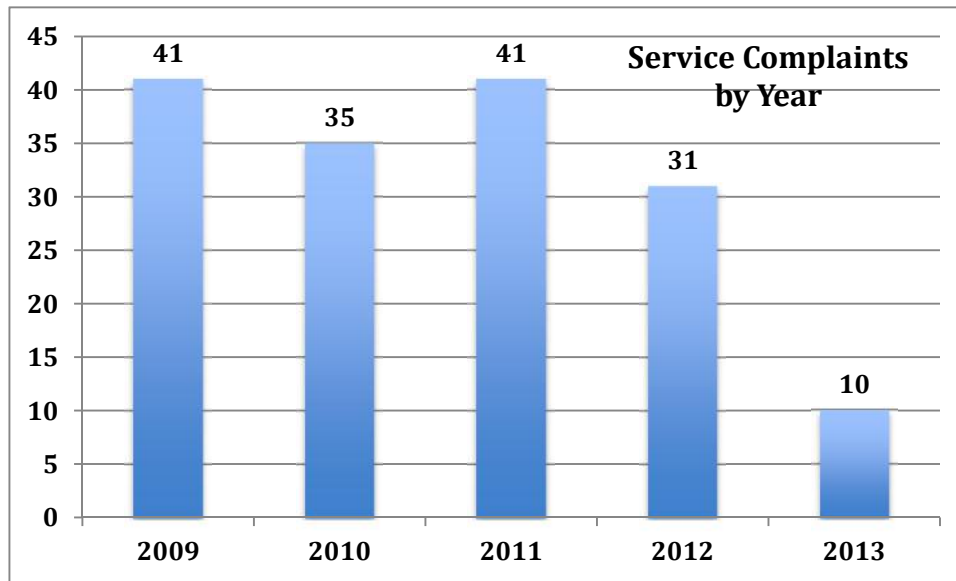
Source: BCA analysis of LASD Service Comment (Complaint) reports for the Transit Services Bureau, Calendar Years 2009 to 2013.

### Service Complaints and Allegations

During the five-year contract period a total of 158 service complaints were received from customers or patrons of Metro. The following exhibit shows these complaints by year and the trend in the number of total service complaints received.



**Exhibit 7**  
**Service Complaints Received by Year**



*Source: BCA analysis of LASD Service Comment (Complaint) reports for the Transit Services Bureau, Calendar Years 2009 to 2013.*

Service complaints are categorized by specific allegations or categories of service concern. The following are the categories used:

- Policy and Procedures
- Response Time
- Traffic Citation
- Other

Each service complaint can include multiple allegations or categories of complaint. For example, one complaint could include violations of policy and procedures, and concerns about response time.

The 158 Service complaints received included 171 specific allegations for the period reviewed. The following exhibit shows the number of each type of allegation made during each of the five contract years in a table.

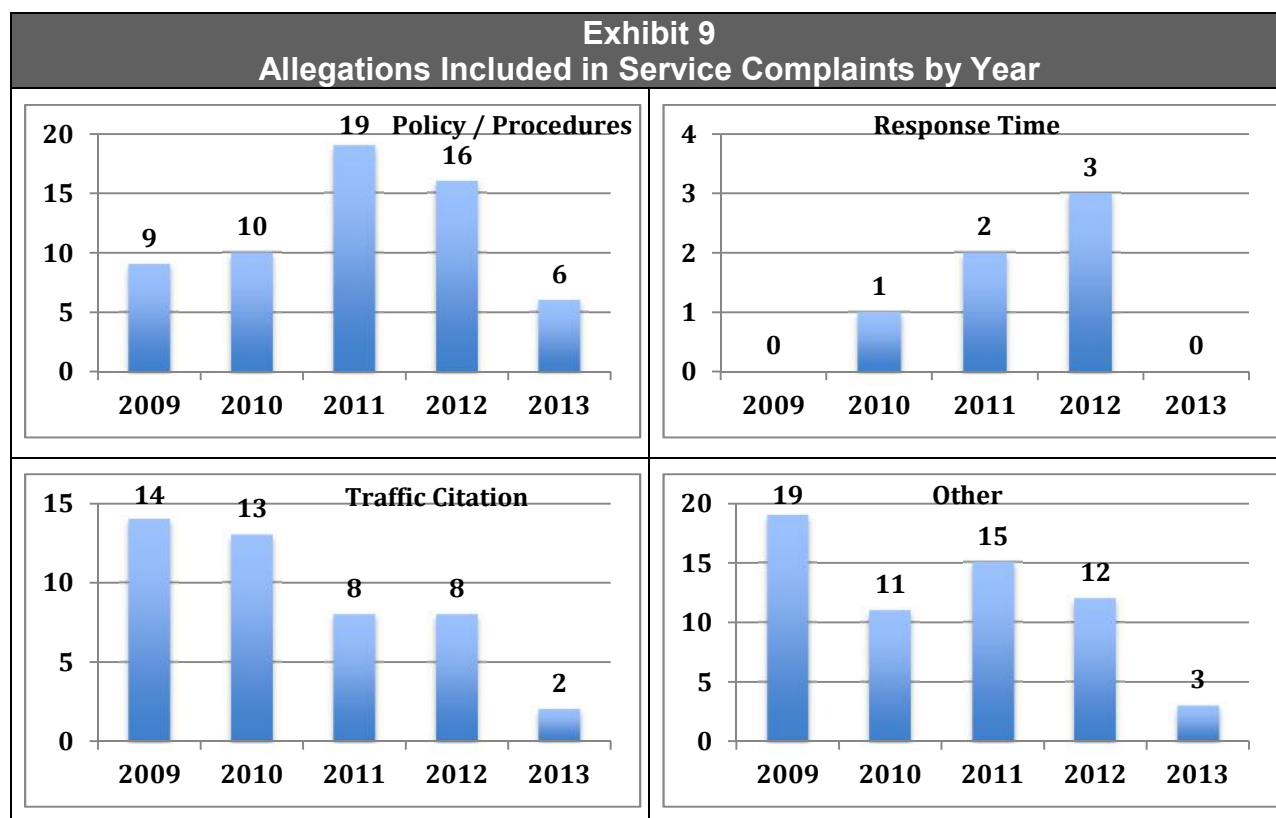
**Exhibit 8**  
**Allegations Included in Service Complaints by Year**

Allegation Type	2009	2010	2011	2012	2013	Total
Policy/Procedures	9	10	19	16	6	60
Response Time	0	1	2	3	0	6
Traffic Citation	14	13	8	8	2	45
Other	19	11	15	12	3	60
Total	42	35	44	39	11	171

*Source: BCA analysis of LASD Service Comment (Complaint) reports for the Transit Services Bureau, Calendar Years 2009 to 2013.*



The following exhibit shows the number and trend for each type of allegation made during each of the five contract years in graphs.



### **Disposition of LASD Personnel Complaints**

Law enforcement standards and common practice among law enforcement agencies require that investigations of complaints and allegations against law enforcement personnel result in a conclusion of fact. Law enforcement standards, as established by the Commission on Law Enforcement Accreditation (CALEA) dictate that these conclusions of fact reach one of the following determinations:

- Exonerated: Incident occurred, but the employee's actions were lawful, proper and consistent with rules, regulations, policy, or state laws.
- Unfounded: Allegation is false or not factual.
- Not Sustained: Insufficient facts either to prove or disprove the allegation.
- Sustained: The allegation is found to be substantially true. Generally speaking, the incident occurred and the specifically cited rule(s), regulation(s), or other general or special order(s) were violated by the employee.

Upon completion of the investigation into specific allegations and a finding of fact appropriate corrective action should be taken.



**Finding 27: Investigations and dispositions of personnel complaints made against TSB personnel are not consistent with industry best practices.**

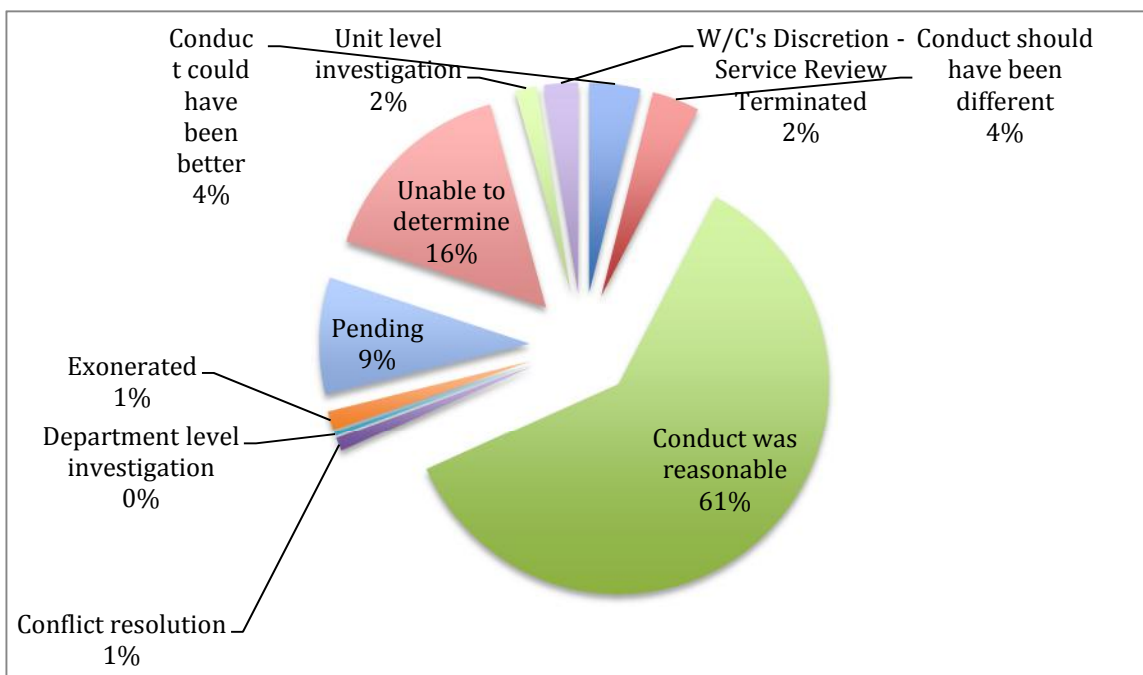
LASD uses the following dispositions for allegations made in complaints against TSB personnel:

- Employee Conduct Appears Reasonable: Review indicated the employee's actions appear to be in compliance with procedures, policies, guidelines, or training.
- Appears Employee Conduct Could Have Been Better: The employee's actions were in compliance with procedures, policies, and guidelines. The complaint could have been minimized if the employee had employed tactical communication principles or common sense.
- Employee Conduct Should Have Been Different: The employee's actions were not in compliance with established procedures, policies, guidelines, or training. Watch Commander will take appropriate action.
- Unable to Make a Determination: The review revealed insufficient information to assess the employee's alleged conduct or to identify the employees involved.
- Resolved - Conflict Resolution Meeting: A conflict resolution meeting with the reporting party and involved employee(s) was held. The meeting adequately addressed all concerns and no further actions are deemed necessary.
- Watch Commander's Discretion - Service Review Terminated:
  - Reporting Party under the influence at time of complaint and re-contacted when sober - no misconduct reported.
  - Factually impossible complaint or complaining party demonstrated diminished capacity.
  - Third party complaint without witnesses where the allegedly aggrieved party is uncooperative or unavailable and there is insufficient evidence to continue review or inquiry.
  - Watch Commander has personal knowledge the complaint is false.
- Exoneration:
  - The employee was not personally involved or in any way connected to the incident or alleged conduct.
  - Inquiry revealed that all allegations were clearly false or reporting party demonstrated diminished capacity.
  - The allegations, broadly construed and even if true, would not in any circumstances constitute a violation of the law or Department policy, rule, or procedure, and the conduct is not otherwise censurable.

The following exhibit shows the dispositions of personnel complaints received between 2009 and 2013.



### Exhibit 10 Disposition of Personnel Complaints – 2009 to 2013



Source: BCA analysis of LASD Service Comment (Complaint) reports for the Transit Services Bureau, Calendar Years 2009 to 2013.

The categories used by the LASD do not adequately result in a conclusion of fact regarding the specific allegations made. As this exhibit shows, for the majority (61%) of personnel complaints the conduct of the LASD personnel involved was determined to be reasonable. However, it is not clear whether the allegation was determined to be factual or not during the investigation.

There were numerous complaints that alleged that the LASD personnel used inappropriate language or called the complaining party inappropriate names. These complaints often resulted in a disposition that the conduct was reasonable. It is hard to imagine a circumstance where such conduct could be reasonable if the allegations were determined to be factual.

**Recommendation 27: Metro should work with LASD to revise its approach to investigating and concluding on allegations made to include specific conclusions of fact using the four standard categories of exonerated, unfounded, not sustained, or sustained.**

#### Timeline for Investigation and Disposition of Personnel Complaints

Maintaining the confidence of the public requires that law enforcement agencies be responsive in communicating with those submitting complaints. This is accomplished



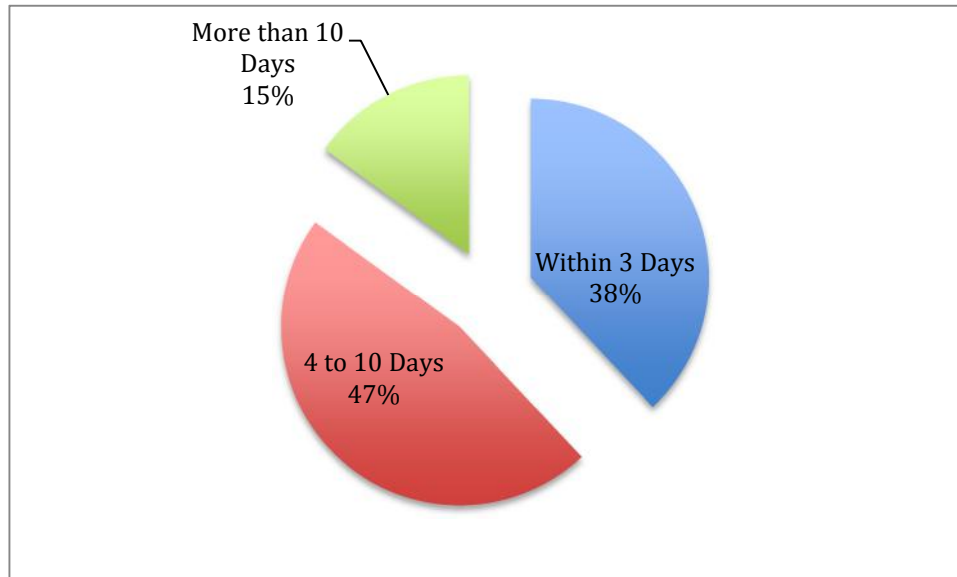
by timely acknowledgment of receipt of complaints, and providing timely notification of the results of complaint investigations.

Standards for law enforcement agencies establish specific timelines for acknowledging the receipt of a complaint and for notifying the individual making the complaint of the outcome or disposition of the investigation into the complaint. The SCR Handbook states that acknowledgement letters should be sent to the reporting party within 3 days of the date a report is taken. The SCR Handbook also requires that final outcome letters be sent to the reporting party within 30 days of the date the report is taken.

**Finding 28: Timelines established by LASD policy for sending acknowledgement and outcome letters are not met for most complaints.**

Our analysis of LASD Service Comment (Complaint) reports for the TSB for Calendar Years 2009 to 2013 found that acknowledgement letters were sent within the required 3 day time period in only 38% of the cases. Another 47% took between four and ten days for the acknowledgement letter to be sent. About 15% took more than 10 days for the acknowledgement letter to be sent. The average was 8.4 days, and in one case, it took 406 days for the acknowledgement letter to be sent. The exhibit below shows these results.

**Exhibit 11**  
**Number of Days Required to Send**  
**Complaint Acknowledgement Letter**



*Source: BCA analysis of LASD Service Comment (Complaint) reports for the Transit Services Bureau, Calendar Years 2009 to 2013.*

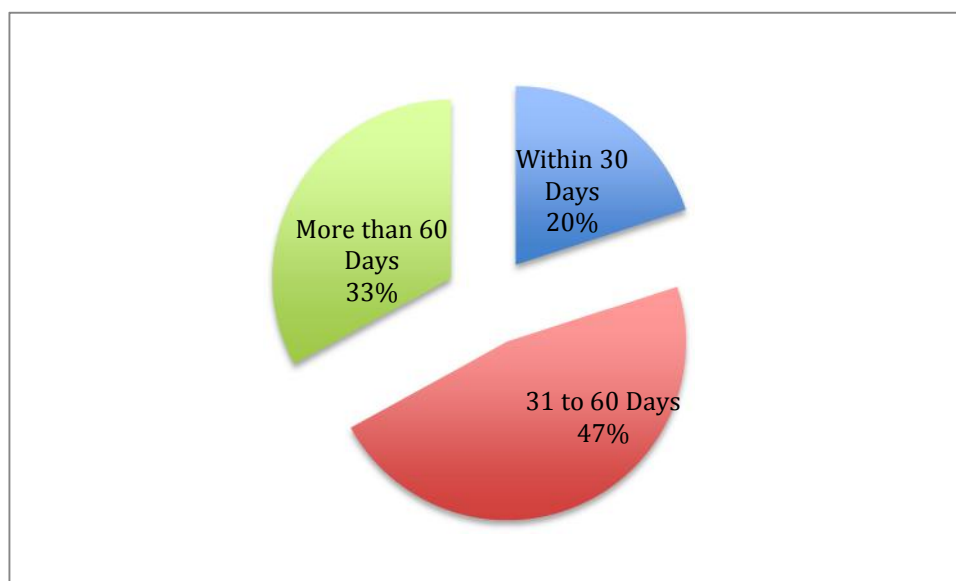
We also analyzed the time it took to send complaint final outcome letters. We found that outcome letters were sent within the required 30 day time period in only 20% of the cases. Another 47% took between thirty-one and sixty days for the final outcome letter to be sent. About 33% took more than 60 days for the final outcome letter to be sent.





The average was 57 days, and in one case, it took 578 days for the final outcome letter to be sent. The exhibit below shows these results.

**Exhibit 12**  
**Number of Days Required to Send**  
**Complaint Final Outcome Letter**



*Source: BCA analysis of LASD Service Comment (Complaint) reports for the Transit Services Bureau, Calendar Years 2009 to 2013.*

**Recommendation 28: Metro should require LASD to ensure a more effective method of monitoring and enforcing the required timelines for sending acknowledgement and final outcome letters to individuals submitting complaints.**

### **Corrective Actions Resulting From Complaints**

One key purpose for receiving and investigating complaints is to identify law enforcement personnel that frequently or habitually engage in inappropriate behavior. Even if the results of investigations are inconclusive tracking complaints can provide an “early warning” system to identify and take corrective actions to improve employee conduct. This is in the best interest of both the law enforcement agency and its personnel, ideally identifying and mitigating behaviors before they become career limiting or ending for the employee, or creating liability for the agency.

LASD has established a corrective action program that includes two functions – monitoring and planning, and corrective action. Part of this program is the Performance Mentoring Program, a proactive, early intervention program designed to enhance an employee’s professional performance through guidance and supervision. Employees are identified as candidates and become part of the program when it is determined that a specific employee may benefit from such a structure plan. LASD executives,



managers, and supervisors carefully monitor the employee's progress to ensure the employee remains an effective and productive member of the Department.

**Finding 29: A significant number of LASD personnel have multiple personnel complaints, including complaints for discourtesy. However, performance mentoring, the LASD approach to improving employee work performance issues, has been minimally used within TSB.**

Employees that are candidates for the Performance Mentoring Program are identified primarily through review of employees with significant numbers of personnel complaints, involvement in shootings, and cases of use of force. The following exhibit shows the number of personnel who have received two or more personnel complaints over the past 24 months. The exhibit shows, there were a total of 19 LASD personnel assigned to TSB with four or more personnel complaints during the past 24 months. Another 91 had two or three personnel complaints during the past 24 months.

Exhibit 13 Employees with Two or More Personnel Complaints During Past 24 Months	
Personnel Complaints	Number of Employees
8	1
7	2
6	4
5	4
4	8
3	27
2	64
Source: LASD Report "Employees with Two or More Personnel Complaints During the Last 24 Months" for the Transit Services Bureau, Dated 11/21/2013	

As the following exhibit shows, there were a total of 15 LASD personnel assigned to TSB with eight or more uses of force during the past 24 months. Another 26 had five, six or seven uses of force during the past 24 months.



<b>Exhibit 14</b>	
<b>Number of Personnel With Five or More Uses of Force</b>	
<b>Uses of Force</b>	<b>Number of Employees</b>
13	1
12	1
11	3
10	1
9	3
8	6
7	12
6	6
5	8
Source: LASD Report "Employees with Five or More Uses of Force During the Last 24 Months" for the Transit Services Bureau, Dated 11/21/2013	

Given the number of TSB personnel with numerous personnel complaints, as well as with numerous uses of force, a comparable number of employees would be expected to participate in the Performance Mentoring Program. However, only four employees were identified for the Performance Mentoring Program, and only two of these employees were placed in the Program during 2012 and 2103. The following exhibit shows the number of employees identified as possible candidates for the Performance Mentoring Program, and those placed in the Program for each of the contract years.

<b>Exhibit 15</b>		
<b>TSB Employees Identified as Candidates and Placed in the Performance Mentoring Program</b>		
<b>Year</b>	<b>Identified as Performance Mentoring Candidates</b>	<b>Placed in the Performance Mentoring Program</b>
2009	6	4
2010	6	4
2011	1	1
2012	3	2
2013	1	0
Total	17	11

As this exhibit shows, only 11 TSB employees have been placed in the Performance Mentoring Program during the five-year period from 2009 to 2013.

Most major police agencies across the country have what are called "Early Warning Systems" that monitor officer complaints and identify those who have multiple complaints so these complaints can be reviewed for patterns and officers can receive counseling on how to better interact with the public. The U. S. Department of Justice, in its civil rights complaints against police agencies that have resulted in mandated court monitoring of consent decrees, has required that all such agencies have robust systems



of this type. Metro should ensure that such a system is in place for all employees who have contact with the public.

**Recommendation 29: Metro should require LASD TSB to significantly expand the use of the LASD Performance Mentoring Program for employees with numerous personnel complaints, uses of force, or other indicators of potential concern.**



## **Security Organization and Responsibilities**

The responsibility for providing safety and security of Metro's bus and rail lines is shared between Metro's security function and contract services provided by the LASD. Metro's security functions are under the authority of the Metro chain of command, but is overseen and deployed through the LASD Communications and Watch Command system. LASD contract services are under the chain of command of the Sheriff's Department, but must be closely coordinated and responsive to the needs and directions of Metro's Executive Officers. Establishing a clear organization structure and clearly identifying and assigning roles and responsibilities is essential to these two entities working together effectively.

To assess the organization of security operations and allocation of responsibilities, we:

- ✓ Obtained and reviewed past and present written strategies for both the Metro security function and LASD contracted services.
- ✓ Obtained and reviewed documents and materials that outline or define the roles and responsibilities, and establish communication and coordination protocols of Metro security personnel and LASD contracted personnel.
- ✓ Obtained and reviewed any policy documents (including Board directives) regarding the organization, roles, or responsibilities of the Metro security function and LASD contracted services.
- ✓ Interviewed key management, command, and supervisory personnel to understand, including information collected and analysis completed during the development of the plans.
- ✓ Conducted site visits of both Metro security function operations and LASD contracted services to obtain an in-depth understanding of their functions, deployment, and operations.
- ✓ Identified and evaluated alternative organization structures and allocation of responsibilities.
- ✓ Developed conclusions, findings, and recommendations.

Our data collection and analysis efforts were targeted toward providing answers to the following questions outlined in the Request for Proposals:

1. Is there a comprehensive written strategy for the Metro security function?
2. Is there synergy of operations between LASD and the Metro transit security function in terms of coordination, complementary, and mutual support?
3. Is the coordination/communication between the LASD and Metro transit security adequate?
4. Are roles/responsibilities between LASD and Metro transit security clearly delineated?
5. What is the advisability of:
  - Consolidating of Security, Safety, Risk Management, and Emergency Preparedness or any of these into one department.



- Implementing Metro Board direction (in December 2008) to consolidate certain security functions such as fare enforcement and deterrence/presence to Metro transit security.
- Using Metro transit security staff to perform fare enforcement, issue transit citations, and perform other non-law enforcement functions.

### **Metro Security Roles and Responsibilities**

A key principle of organizational management is to clearly define roles and responsibilities, and ensure that those roles and responsibilities are communicated to the members of the organization. Included in this, is ensuring that there is minimal overlap or duplication of roles and responsibilities, and that skills, abilities, and authorities are consistent with assigned roles and responsibilities.

#### **Finding 30: Roles and responsibilities of Metro Security have not been clearly or appropriately defined, and in some instances, current roles extend beyond the authority and common practice of security officers.**

Metro has not developed a written strategy for the Metro Security function. In 2011, Metro and LASD participated in an effort referred to as the Los Angeles Metro Protective Services (LAMPS) project. The purpose of this effort was to “create a seamless, unified and superlative team.” The effort included developing a common mission, strategy and goals. It also attempted to define roles and responsibilities and improve communication and coordination among the groups.

The attempt to develop a common mission and goals appear positive on the surface. However, the approach used did not include acknowledgement or consideration of the fact that Metro Security and the LASD have very different core missions and therefore very different roles and responsibilities.

Metro Security's primary role is to provide security over Metro facilities. This includes the Gateway Building, parking lots, bus division facilities, and similar operations. It also includes providing security over Metro revenue collection and counting operations. In these roles, Metro Security has the role of providing a visible deterrence, as well as to observe and report an unlawful activity to law enforcement. Metro Security should not play a role in responding to or handling law enforcement incidents, which is beyond the authority of security officers.

The LASD's primary role is to provide law enforcement throughout the Metro transit system. This includes the Metro rail and bus lines, as well as Metro facilities. This should include proactive law enforcement efforts, as well as responding to and handling any reported incidents within the Metro system.

There is a need for Metro Security and LASD to communicate and coordinate their activities. However, the effectiveness of each will be maximized to the extent that their specific and separate roles are defined and enforced. Each should operate within clear lanes of authority and responsibility, with overlaps and duplications minimized to the extent possible.



In addition to clearly identifying authorities and responsibilities, it is important to clearly define jurisdictional responsibilities. Currently, Metro Security has responsibility for security over Metro facilities, with limited responsibility for security within the rail and bus line operations. The exception is Metro Security's responsibility for closing and opening the rail stations along Metro's Red Line. This operation requires Metro Security Officers to be proactive and often physically remove individuals from the stations. This is more in line with a law enforcement function, and should be reassigned to the LASD, which has general responsibility and jurisdiction for the Metro Red Line.

Metro transit security staff could be used to perform fare enforcement, issue transit citations, and perform other non-law enforcement functions. This would need to be accomplished in close communication and coordination with LASD to provide appropriate law enforcement backup for Security Officers performing these functions.

**Recommendation 30: Metro should develop clear and appropriate roles and responsibilities for Metro Security and develop a written strategy for the Metro Security function. In developing this strategy, Metro should evaluate the use of Metro Security staff to perform fare enforcement, issue transit citations, and perform other non-law enforcement functions.**

### **Contract Requirements Regarding Metro Security**

The contract between Metro and LASD includes a number of specific requirements regarding Metro Security. These include that LASD Watch Commanders provide command, control, and coordination of Metro Security Officers; and LASD and Metro Security be co-located, conduct unified briefings, unified training, and develop integrated training and operational procedures. All of these requirements, as well as whether they are being met, are provided on Pages A-5 and A-6 of the Appendix of this report.

**Finding 31: Many of the contract requirements regarding LASD oversight of Metro Security (Watch Commander oversight, training, etc.) have not been implemented.**

The current contract includes thirteen requirements regarding Metro Security. Of these, six are currently being met, two are being partially met, and five are not being met. The requirements that are not being met relate primarily to an attempt to integrate the Metro Security and LASD operations.

As discussed in the previous finding, the two functions have very different missions, authorities, and responsibilities. As such, the two functions have very different operational procedures, training requirements, and focus. Meeting these requirements would not be functional for either Metro Security or the LASD.

Communication and coordination between Metro Security and LASD appears to be good, with ongoing dialog and discussion. LASD also complements Metro Security as needed, and provides "back-up" for Metro Security Officers. LASD also provides supplemental security for Metro Board meetings as needed and requested.



**Recommendation 31: Metro should consider removing the requirements in the current contract focused on integrating the procedures, training, and operations of Metro Security and LASD from future contracts.**

### **Management of Metro Security**

A key principle of organizational design and structure is "Unity of Command," where each individual reports to only one supervisor. This eliminates the potential for individuals to receive conflicting orders from a variety of supervisors, thus increasing accountability, preventing freelancing, improving the flow of information, helping with the coordination of operational efforts, and enhancing operational safety.

The current contract between Metro and LASD states that "all Security personnel and assets of Metro shall be under the command and control of the Metro Deputy CEO." It also states that the LASD TSB Commanding Officer "will manage the day-to-day operations of Metro's Security Department." A LASD Lieutenant has been appointed as Director of Metro Security to fulfill LASD's responsibility under the contract. This creates a dual chain of command.

**Finding 32: The dual chain of command created by assignment of an LASD Lieutenant as Director of Metro Security, while command and control is assigned to the Metro DEO, has not been effective in managing and supervising Metro Security.**

Within this dual chain of command the LASD Lieutenant, acting as Director of Security, has no authority with regards to budget, training, assignment, discipline and other related areas. Metro Security personnel have often referred to LASD personnel as "contractors" with no real authority over them. The current LASD Lieutenant has reportedly made good progress in building relationships with Metro Security personnel, and developing informal authority and cooperation. However, the basic split command structure is flawed, and overcoming these structural flaws requires use of resources that could be more productive elsewhere.

**Recommendation 32: Metro should consider creating a Metro position of Director of Security to replace the current LASD Lieutenant, providing unified command for Metro Security under this position, and requiring ongoing communication and coordination with LASD as one of the key responsibilities of this position.**

### **Regulatory Requirements and Oversight of Metro Security**

Both sworn law enforcement officers and security officers are required to meet specific regulatory requirements and are under the oversight of California State regulatory agencies.

The Commission on Peace Officer Standards and Training (POST) is responsible for establishing and enforcing requirements for sworn law enforcement officers. To accomplish this, POST has established minimum requirements for both basic and





ongoing training of sworn law enforcement officers. POST also reviews training provided and certifies individual law enforcement officers. POST may also decertify officers if they fail to meet requirements or violate standards.

The Bureau of Security and Investigative Services within the California Department of Consumer Affairs is responsible for establishing standards and overseeing private security officers. This includes establishing minimum training requirements and licensing security officers. The Bureau also actively investigates complaints against its licensees. This includes the suspension and revocation of licenses and seeking administrative, criminal, and civil sanctions against violators.

**Finding 33: Lack of clarity over appropriate regulatory requirements and oversight of Metro Security Officers, and compliance with these requirements, creates substantial operational and liability exposure.**

Metro security officers are operating in a gray area. Because they are not sworn law enforcement officers they are not subject to the requirements and oversight of POST. Because Metro is not a private company, the Metro Security Officers are not subject to the requirements and oversight of the Bureau of Security and Investigative Services. This lack of clarity makes it unclear whether Metro Security Officers are in compliance with appropriate requirements.

**Recommendation 33: Metro, with the assistance of LASD, should clarify appropriate regulatory requirements and oversight of Metro Security Officers, and ensure training, policies, and operations are adequate to minimize operational and liability exposure.**



## **Personnel and Billing**

The LASD contract provides that a specific number of both sworn and non-sworn staff be provided in support of Metro's safety and security. These staff may be a mix of personnel specifically assigned to transit security, other LASD staff working temporarily or on overtime, or administrative staff working shifts under the LASD "CARP" (Cadre of Administrative Replacement of Personnel) program. Tracking of time actually spent providing service under the contract is important to determine if services were actually provided. In addition, it is important to determine if staff were assigned and deployed when needed (strategically), rather than assigned and deployed when available to meet contract requirements.

In assessing personnel and billing under the LASD contract we:

- ✓ Prepared a schedule of the base contract, modifications, and the contract value for each fiscal year under the contract for FY 2010 to FY 2013; determined the amount of payments made under the contract for each fiscal year from FY 2010 to FY 2013; and compared to Board approved amounts.
- ✓ Sampled billings and payments for FY 2013 to determine whether billed amounts were in accordance with contract terms and rate schedules. Compared personnel costs billed to work schedules, time sheets, or other records to determine whether LASD personnel were actually present and worked at Metro as billed. Also verified that pay rates used for billing Metro are the same as in the contract.
- ✓ Determined how personnel costs are billed (e.g., by FTE or by the hours). If by FTE, determined how Metro assures that personnel actually worked the hours billed by LASD. Also determined whether the current billing method is the best and most accurate option.
- ✓ Compared personnel staffing provided by LASD with industry best practices.
- ✓ Reviewed the management and supervisory spans of control and compared them with contract requirements and industry best practices.
- ✓ Developed conclusions, findings and recommendations.

Our data collection and analysis efforts were targeted toward providing answers to the following questions outlined in the Request for Proposals:

1. Is the correct number and type of personnel required by the contract? What are the historic and industry best practice ratios of the number of LASD law enforcement staff to caseload and coverage requirements considering such factors as new rail lines added?
2. Is the span of control appropriate?
3. Is Metro being appropriately charged for backfilling when assigned LASD personnel are not available for deployment? Is the "CARP" method for backfilling cost effective for Metro?
4. Is deployment of law enforcement personnel strategically based?



## Board Approved Contract Amounts and Payments

We reviewed the base contract, modifications and Board action documents. We also obtained the total LASD billings and payments information from Metro management and reviewed Metro's Financial Information System (FIS) accounting system to determine the amount of payments made under the contract for each fiscal year from FY 2010 to FY 2013.

We prepared a schedule of the base contract, modifications, and the contract value for each fiscal year under the contract and compared this information to the Board approved amounts and payments made to LASD from FY 2010 to FY 2013.

**Finding 34: The payment made to LASD for FY 2011 was over the Board approved amount and contract value by \$59,368.**

The following exhibit shows the total Board approved contract amounts, and the amounts paid to LASD for each of the four fiscal years. As this exhibit shows, the amount paid to LASD for FY 2011 exceeded the Board approved amount.

<b>Exhibit 16</b>				
<b>Comparison of Board Approved Contract Amounts and LASD Payments</b>				
	<b>FY 2010</b>	<b>FY 2011</b>	<b>FY 2012</b>	<b>FY 2013</b>
Board Approved Contract Amounts	\$69,760,713	\$62,937,004	\$80,725,795	\$80,622,796
Total Metro Payment to LASD	\$67,707,213	\$62,996,372	\$74,726,858	\$79,992,581
Payment Over / (Under) Approved Amount	(\$2,053,500)	\$59,368	(\$5,998,937)	(\$630,215)

The contract value and Board approved amount for FY 2011 was \$62,937,004, but the payments made to LASD for FY 2011 was \$62,996,372. Total payments for FY 2011 exceeded the Board approved amount by \$59,368.

**Recommendation 34: Metro management should ensure payments made to LASD are capped at the Board approved amount and the contract value for each fiscal year. LASD should reimburse Metro for the overpayment of \$59,368 for FY2011, or Metro should obtain Board approval for the amount paid in excess of the Board approved amount.**

## Sample Billings and Payments For FY 2013

Section E of the contract between Metro and LASD states "the invoice submitted to Metro shall include as attachments all necessary supporting documents, schedules, deployment sheets, unit, name, location, assignment dates and time of service, straight time and over-time worked and other materials to fully support the total billing amount."

We reviewed all LASD billings derived from Metro's FIS accounting system for FY 2013, which totaled \$79,992,581. We also selected four months of FY 2013 for detailed testing (July 2012, December 2012, May 2013 and June 2013). The invoices for these months totaled \$27,136,835, approximately 34% of FY 2013's total costs.



The invoices selected for detailed testing included contract service minutes, non-relief access services, non-relief sergeant (Grant), special events overtime and canine support costs. To complete the detailed testing we reviewed invoices, personnel timecards, daily worksheets, overtime slips, contract billing rates, and other supporting documents. This was done to verify whether LASD personnel were actually present and worked at Metro as billed and that the pay rates used for billing Metro were consistent with the contract rates.

**Finding 35: Contract service minutes billed by LASD were not adequately supported by documentation provided for detailed testing as part of this audit.**

LASD submitted monthly contract service billings to Metro with the support of the one-page Monthly Services Compliance Report (Form RAPS\_500A). This report only states the total service minutes provided by various ranks of sworn and civilian personnel for the current billing month with year-to-date total. It does not provide any of the detailed information required by the Contract.

We requested and LASD provided us with the Service Minutes Detailed Reports (Form RAPS\_500E) for review. However, this report does not show the service minutes provided by employee name or employee ID. It is not possible to know who the personnel are or who provided the service minutes from reviewing the Form RAPS\_500E report.

We requested LASD provide modified Service Minutes Detailed Reports (Form RAPS\_500E) showing the service minutes provided by personnel names to support the service minutes stated in the Monthly Services Compliance Report (Form RAPS\_500A). LASD was not able to generate such modified Form RAPS\_500E for the four months that we selected for detailed sample testing in a timely manner during the several months of this audit. We also found variances of total service minutes were noted between the two reports (Form RAPS\_500A and the Form RAPS\_500E).

**Recommendation 35: Metro should require LASD to comply with contract requirements to provide modified Service Minutes Detailed Reports (Form RAPS\_500E) which show the service minutes provided by personnel's names with the monthly contract service billing.**

**Review Process For LASD Payment By Metro Management**

The clear intent of the contract was that LASD would provide detailed information with its monthly billings, and that this information would be thoroughly reviewed prior to Metro payments to LASD.

**Finding 36: The current invoice review process for LASD billings and payments by Metro Management needs to be expanded.**

Metro management currently only reviews LASD's monthly contract service billing invoice and the one- page Monthly Services Compliance Report (Form RAPS\_500A). No actual timecards have been reviewed by Metro management to ensure LASD personnel were actually present and worked at Metro as billed.



Metro management did request LASD to submit personnel timecards with the monthly billings in the past. However, timecards have never been submitted with the monthly billing to Metro for review.

**Recommendation 36:** Metro management should require LASD to provide adequate supporting documents for each monthly service contract billing, and selectively review LASD personnel timecards, overtime slips, and daily worksheets to ensure LASD personnel time records billed are supported with adequate documentation.

### Support for Time Billed to Metro

We selected samples of the service minutes provided by sworn law enforcement personnel and civilian security assistants, work hours charged by full time equivalent (FTE) support personnel, and overtime hours billed by the special events for four months in FY 2013.

We reviewed personnel timecards, overtime slips (if applicable), and daily worksheets (DDW) to verify whether timecards and overtime slips were approved adequately, minutes were recorded properly, and the activities shown in DDW's were related to transit services.

**Finding 37:** LASD was not able to adequately provide documentation for some billed service hours (minutes), nor provide adequate responses for questioned and requested timecards and daily worksheets within the time period of this audit.

The following exhibit shows the total number of hours that were selected for detailed testing for the ranks of Captain, Lieutenant, and Sergeant for the four months of FY 2013 (July and December 2012, and May and June 2013). The exhibit shows the number of hours, by rank, that LASD could not provide support for in the form of completed timecards during the course of this audit. It also shows the number of hours reported and billed to Metro that we questioned because the hours reported and billed were different from the hours reported on the timecards. A total of 1.1% of the hours reported and billed to Metro could not be supported by Timecards. An additional 0.5% of the hours reported and billed differed from those reported on Timecards.

Exhibit 17 Summary of Captain, Lieutenant and Sergeant Hours Not Supported by Timecards or Different from Timecards From Detailed Testing of Four Months of FY 2013								
	Captain		Lieutenant		Sergeant		Totals	
Total Hours Sampled	792	100%	5,921	100%	8,390	100%	15,103	100%
Hours Not Supported by TimeCards	0	0%	152	3%	18	0.2%	170	1.1%
Hours Different than Timecard	0	0%	14	0.2%	58	0.7%	72	0.5%



The following exhibit shows the total number of minutes that were selected for detailed testing for the general sworn and civilian personnel for the four months of FY 2013 (July and December 2012, and May and June 2013). The exhibit shows the number of minutes that LASD could not provide support for in the form of completed timecards and daily worksheets during the course of this audit. It also shows the number of minutes reported and billed to Metro that we questioned because the minutes reported and billed were different from the minutes reported on the timecards. A total of 38.8% of the sworn minutes and 31.2% of civilian minutes reported and billed to Metro could not be supported by Timecards and daily worksheets. An additional 39.9% of the sworn hours and 31.7% of civilian reported and billed time differed from those reported on Timecards.

<b>Exhibit 18</b>				
<b>Summary of Sworn and Civilian Personnel Minutes Not Supported or Questioned Based on Detailed Testing of Four Months of FY 2013</b>				
<b>Unsupported</b>	<b>Sworn</b>		<b>Civilian</b>	
Total Minutes Sampled	1,347,123	100%	387,,333	100%
Time Card Not Provided	159,580	11.8%	14,400	3.7%
Daily Worksheet Not Provided	307,348	22.8%	96,060	24.8%
Neither Time Card Nor Daily Worksheet Provided	55,625	4.1%	10,560	2.7%
Total Unsupported	522,553	38.8%	121,020	31.2%
<b>Questioned</b>	<b>Sworn</b>		<b>Civilian</b>	
Discrepancies Noted	9,360	0.7%	1,440	0.4%
Administrative Work Charged	5,010	0.4%	480	0.1%
Total Questioned	14,370	1.1%	1,920	0.5%
<b>Total Unsupported or Questioned</b>	<b>Sworn</b>		<b>Civilian</b>	
Total Unsupported or Questioned	536,923	39.9%	122,940	31.7%

**Recommendation 37: Metro should require LASD to ensure that adequate and accurate documentation of hours and minutes billed to Metro under the contract is readily available to support the amounts billed to Metro.**

### **Compliance of Monthly Service Minutes by LASD**

The contract establishes a specific staffing level, by staffing type, that LASD is to provide to police the Metro transit system. The staffing is theoretically based on some analysis of staffing that is needed to provide adequate service to the transit system.

**Finding 38: The level of staffing provided by LASD varies substantially from month to month, while billings are at a one-twelfth of the annual contract amount.**

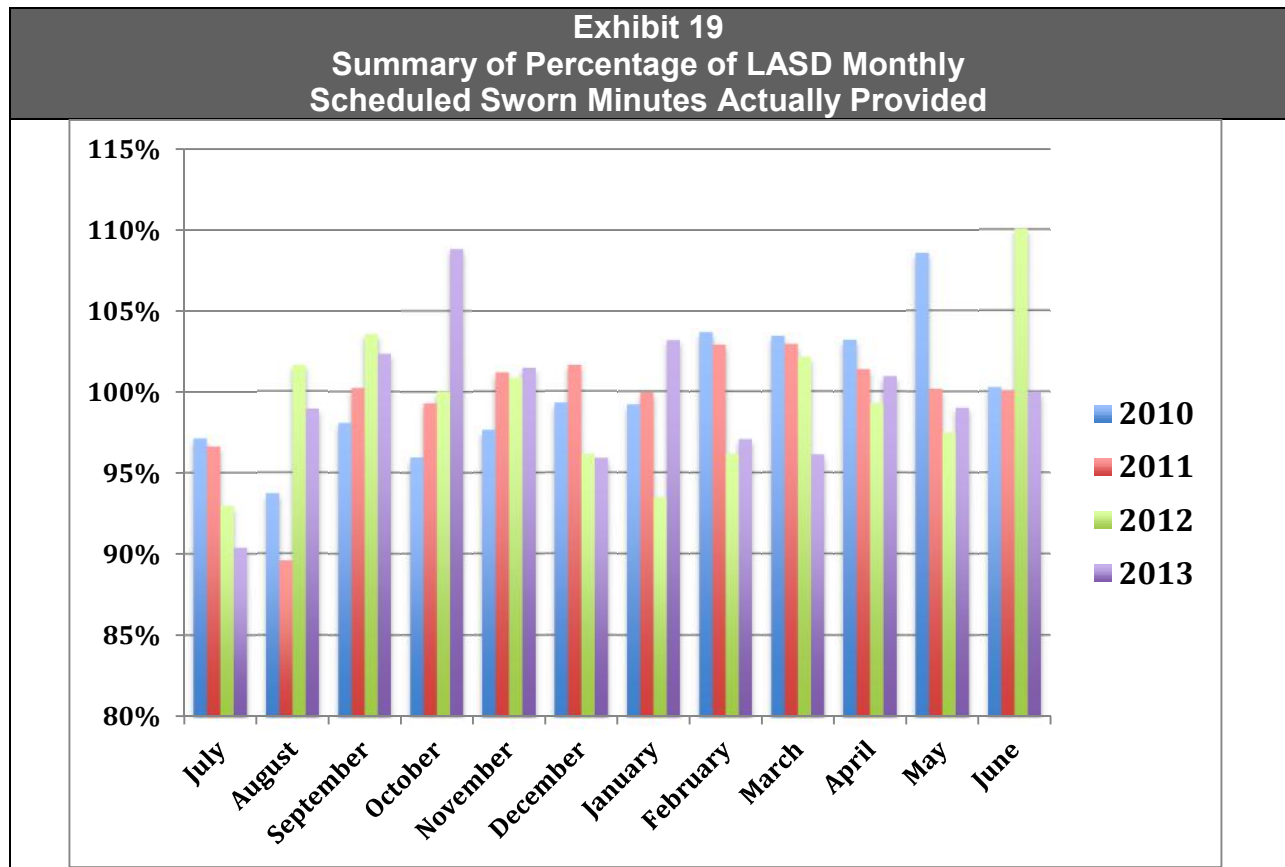
The monthly contract service billing submitted to Metro by LASD for payment is not based on the current month's actual service minutes provided by LASD TSB personnel. Instead, LASD simply divides the total contracted dollar amount by 12 months to derive at the monthly service fee billed to Metro.

The total minutes scheduled each month for both sworn and civilian personnel are based on the approved budget minutes for each fiscal year. We compared the



budgeted number of minutes to be provided each month with the actual minutes provided using LASD's RAPS 500A Monthly Report.

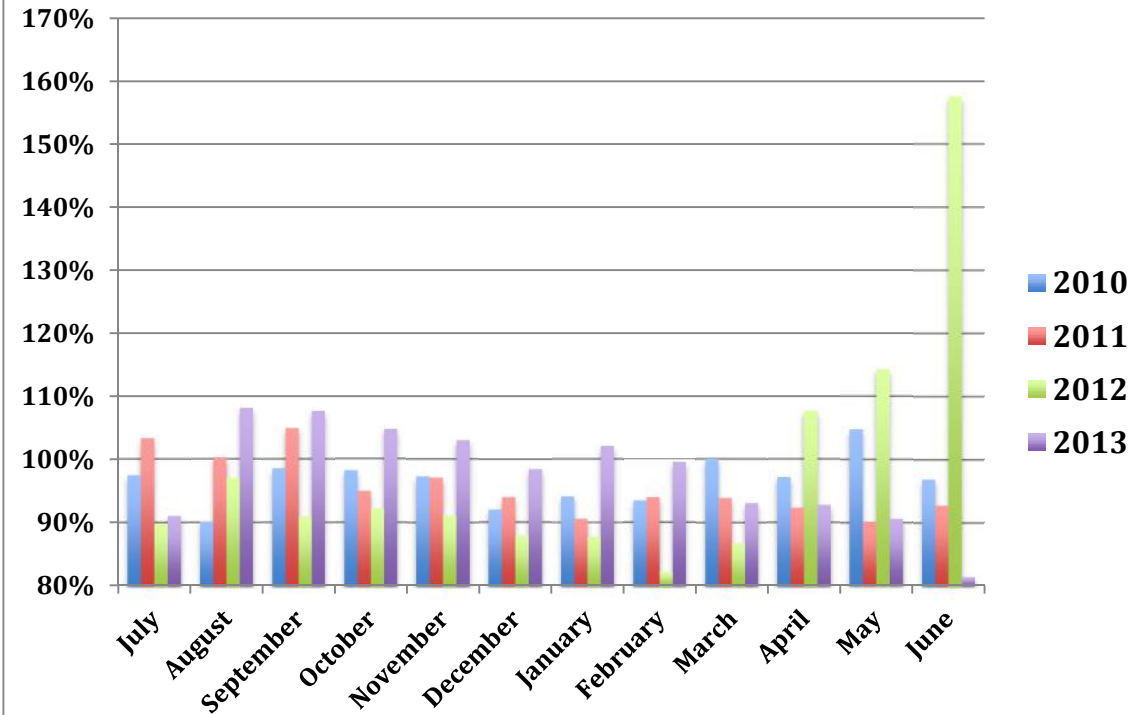
As the following exhibit shows, there was a substantial level of variability in the actual number of sworn minutes provided each month. The monthly compliance rates ranged from a low of 89.6% in August 2010 (FY 2011), to a high of 110% in June 2012 (FY 2012).



As the following exhibit shows, there was a similar substantial level of variability in the actual number of civilian service minutes provided each month. The monthly compliance rates ranged from a low of 81.5% in June 2013 (FY 2013), to a high of 157.6% in June 2012 (FY 2012).



Exhibit 20  
Summary of Percentage of LASD Monthly  
Scheduled Civilian Minutes Actually Provided



If LASD is short in providing TSB personnel for a particular month as stipulated in the Contract with Metro, LASD does not adjust its monthly billing for the shorted personnel. According to LASD's management, they attempt to catch up on the shortage of minutes by assigning additional personnel to TSB in other months to make sure the total purchased minutes at the end of the fiscal year would meet the target of the total purchased minutes set by the Contract.

Under this billing method, Metro does not get the full benefit of what it paid for the TSB service during the months with personnel shortages. Increasing personnel in a particular month should be based on actual needs, or special situations or requests by Metro instead of just making up the shortage of minutes provided by LASD. LASD did not provide stable levels of personnel by keeping teams with the set number of personnel as assigned by the Contract.

**Recommendation 38: Metro should require LASD to provide a more stable monthly level of both sworn and civilian staffing, and should bill for actual minutes provided, and adjust its billing accordingly if LASD reduced its personnel assigned to TSB in a particular month.**





## **Rates Charged for Management, Supervisory, Support Personnel and Overhead**

LASD's approach to billing for its services is based on developing fully loaded or fully burdened rates for its various service or line units. These line services or units include the Bonus Deputy, Motors, Patrol, Non-Relieved Sergeant, Special Assignment Officer (SAO), Deputy, and non-sworn (Security Assistants). Annual rates for each of these line units are developed, and then these rates are billed on a cost per minutes provided.

LASD includes in the rates for these services or units an allocation of LASD management and supervisory personnel, support personnel, and overheads. This includes the full time equivalent (FTE) salaries of captains, lieutenants, sergeants, and civilian support personnel, plus overhead costs. All of these are incorporated in the calculation of various service units' billing rates, which are used to bill Metro on a monthly basis.

**Finding 39: LASD did not adjust rates billed for services or units when management, supervisory, or support positions included in billing rates were vacant.**

When vacancies or less than full time equivalent hours were provided for the captain, lieutenant, sergeant or other civilian support positions during the year, LASD still billed Metro with the same monthly contract amount. Metro was overcharged to the extent these management, supervisory, and support positions were vacant.

For each fiscal year (FY 2010 to FY 2013) we identified the number of management, supervisory, and support personnel that were included in the TSB Cost Model Baseline as provided by LASD. For each year we also identified the number of each of these positions that were vacant during the year. The following exhibit provides an example of the number of required positions and vacant positions during some periods of the contract.

<b>Exhibit 21</b> <b>Summary of Percentage of LASD Monthly Scheduled Civilian Minutes Actually Provided</b>			
<b>Position</b>	<b>Number of Positions in LASD Cost Model</b>	<b>Vacancies During a Portion of the Contract Period</b>	<b>Percentage of Positions Vacant</b>
Captain	2	2	100%
Lieutenant	12	3	25%
Sergeant	53	8	15%
Civilian Support	50	6	12%
<i>The complete results of the analysis of vacancies in management, supervisory, and support positions is provided in Appendix B of this report.</i>			

As this exhibit shows, there have been significant vacancies in the management, supervisory, and support positions that are included in the rates used to bill Metro. Billing rates should be adjusted based on the positions actually filled, or Metro reimbursed for vacant positions.



**Recommendation 39: Metro should require LASD to adjust the monthly service contract invoiced amount billed to Metro if the FTE positions of the captain, lieutenant, sergeant and other civilian support positions as set by the Contract were not actually provided during the billing period.**

#### **Annual Work Hours for Management, Supervisory, and Support Personnel**

We also identified the actual number of hours worked by management and supervisory personnel included in LASD billing rates used to bill Metro on a monthly basis. LASD provided reports showing the total actual hours worked by these positions to verify if these personnel's actual hours worked were equal to the hours set by the Contract. We estimated each full time position should work 2,080 hours annually, then we identified the number of positions in the Contract for FY 2010 to 2013 and estimated how many work hours these positions should work during each fiscal year. We compared this to the actual number of hours worked shown in the LASD reports.

**Finding 40: The actual hours worked by management and supervisory personnel included in billing rates were much lower than the hours set by the Contract for FY 2010 to FY 2013.**

LASD provided the Weekly Actual Hours Worked Report for the positions of Captains, Lieutenants, and Sergeants. We calculated the total actual hours worked by these personnel for FY 2010 to FY 2013 and compared the actual hours worked to the estimated worked hours set by the Contract. The following exhibit shows this comparison.



<b>Exhibit 22</b>						
<b>Summary of Captain, Lieutenant and Sergeant Actual Worked Hours</b>						
	<b>No. of Personnel Per Contract</b>	<b>Annual Full Time Work Hours per personnel</b>	<b>Total hours per Contract</b>	<b>Actual Hours Worked</b>	<b>Variance</b>	<b>% of Actual Worked Hrs to Total Hrs. Per Contract</b>
<b>FY 2013 Positions:</b>			<b>a</b>	<b>b</b>	<b>c = b - a</b>	<b>d = b / a</b>
Captain	2	2,080	4,160	2,401	(1,759)	58%
Lieutenant - Ops	2	2,080	4,160			
Lieutenant - Area	10	2,080	20,800			
Lieutenant Subtotal:	12	4,160	24,960	19,550	(5,410)	78%
Sergeant - Ops	2	2,080	4,160			
Sergeant - D. B.	1	2,080	2,080			
Sergeant - Scheduling	1	2,080	2,080			
Sergeant - Rail	24	2,080	49,920			
Sergeant - Bus	21	2,080	43,680			
Sgt - Motorcycle Officer	4	2,080	8,320			
Sergeant Subtotal: *	53	12,480	110,240	62,066	(48,174)	56%
Total:	67	18,720	139,360	84,017	(55,343)	60%
<b>FY 2012 Positions:</b>			<b>a</b>	<b>b</b>	<b>c = b - a</b>	<b>d = b / a</b>
Captain	2	2,080	4,160	2,830	(1,330)	68%
Lieutenant - Ops	2	2,080	4,160			
Lieutenant - Area	9	2,080	18,720			
Lieutenant Subtotal:	11	4,160	22,880	19,387	(3,493)	85%
Sergeant - Ops	2	2,080	4,160			
Sergeant - D. B.	1	2,080	2,080			
Sergeant - Scheduling	1	2,080	2,080			
Sergeant - Rail	20	2,080	41,600			
Sergeant - Bus	21	2,080	43,680			
Sgt - Motorcycle Officer	3	2,080	6,240			
Sergeant Subtotal: *	48	12,480	99,840	76,331	(23,509)	76%
Total:	61	18,720	126,880	98,548	(28,332)	78%
<b>FY 2011 Positions:</b>			<b>a</b>	<b>b</b>	<b>c = b - a</b>	<b>d = b / a</b>
Captain	2	2,080	4,160	3,603	(557)	87%
Lieutenant - Ops	2	2,080	4,160			
Lieutenant - Area	9	2,080	18,720			
Lieutenant Subtotal:	11	4,160	22,880	18,859	(4,021)	82%
Sergeant - Ops	2	2,080	4,160			
Sergeant - D. B.	1	2,080	2,080			
Sergeant - Scheduling	1	2,080	2,080			
Sergeant - Rail	20	2,080	41,600			
Sergeant - Bus	21	2,080	43,680			
Sgt - Motorcycle Officer	3	2,080	6,240			
Sergeant Subtotal: *	48	12,480	99,840	84,205	(15,635)	84%
Total:	61	18,720	126,880	106,667	(20,213)	84%
<b>FY 2010 Positions:</b>			<b>a</b>	<b>b</b>	<b>c = b - a</b>	<b>d = b / a</b>
Captain	2	2,080	4,160	3,710	(450)	89%
Lieutenant - Ops	2	2,080	4,160			
Lieutenant - Area	9	2,080	18,720			
Lieutenant Subtotal:	11	4,160	22,880	12,845	(10,035)	56%
Sergeant - Ops	2	2,080	4,160			
Sergeant - D. B.	1	2,080	2,080			
Sergeant - Scheduling	1	2,080	2,080			
Sergeant - Rail	20	2,080	41,600			
Sergeant - Bus	21	2,080	43,680			
Sgt - Motorcycle Officer	3	2,080	6,240			
Sergeant Subtotal: *	48	12,480	99,840	43,280	(56,560)	43%
Total:	61	18,720	126,880	59,834	(67,046)	47%

\*Flexed and overtime hours were not included in the Lieutenants and Sergeants' actual worked hours.

The above exhibits show the actual hours worked by Captains, Lieutenants and Sergeants were significantly lower than the estimated full time work hours established in



the Contract. The total percentage of actual worked hours compared to the estimated work hours set by the Contract ranged from 47% for FY 2010 to 84% for FY 2011.

**Recommendation 40: Metro should require LASD adjust the monthly service contract invoiced amount billed to Metro based on the number of management and supervisory hours actually provided.**

### **Cadre of Administrative Replacement Personnel (CARP) Record Keeping**

As discussed in other sections of this report, LASD administrative personnel have been assigned to spend up to 20% of their time providing direct line service. This program is called the Cadre of Administrative Replacement Personnel, or CARP. A significant number of these CARP personnel provide service within TSB.

**Finding 41: LASD did not maintain adequate records of time spent at TSB by CARP personnel. In addition, CARP time exceeded the target maximum rate of 10%.**

We requested LASD to provide reports showing a list of the CARP personnel from other units assigned to TSB for FY 2010 to FY 2013 and how many CARP hours they worked at TSB. LASD was not able to provide a report with this information, nor did they have any reports showing the CARP service minutes as a percentage of total TSB line personnel service minutes by dates, months, and years.

LASD was able to provide a manual list of the CARP personnel who worked for a particular day during the month. Using these manual lists, we identified the number of CARP time worked for the months for July and December 2012, and May and June 2013. We computed the percentage of CARP service minutes of total minutes provided by the line personnel for the selected four months' period. The following exhibit shows this comparison.

<b>Exhibit 23</b>				
<b>Summary of CARP Service Minutes and Total Line Service Minutes</b>				
	<b>July 2012</b>	<b>Dec. 2012</b>	<b>May 2013</b>	<b>June 2013</b>
<i>Total CARP Service Minutes:</i>	194,381	203,279	369,645	255,035
<i>Total line Service Minutes:</i>	2,905,704	3,081,765	3,185,055	3,105,435
<i>Percentage</i>	6.69%	6.60%	11.61%	8.21%

**Recommendation 41: Metro should require LASD to maintain adequate records of the service minutes provided by CARP personnel to ensure compliance with maximum CARP percentage requirements. Metro should also consider reducing the current CARP maximum rate of 10%, or eliminating CARP personnel.**

### **Backfilling Line Positions by TSB Support Personnel**

As discussed previously, LASD's approach to billing for its services is based on developing fully loaded or fully burdened rates for its various service or line units. LASD includes in the rates for these services or units an allocation of LASD management and



supervisory personnel, support personnel, and overheads. This includes the full time equivalent (FTE) salaries of captains, lieutenants and sergeants, and civilian support personnel, plus overhead costs. All of these are incorporated in the calculation of various service units' billing rates, which are used to bill Metro on a monthly basis.

According to LASD management, the commander, captains, lieutenants and sergeants frequently work or CARP other line support personnel while bonus I and sheriff personnel generally CARP for line personnel who generate service minutes. Support personnel like Law Enforcement Technician will CARP other line personnel working in the dispatch desk.

**Finding 42: Some LASD personnel time was billed twice to Metro when personnel whose costs are included in the billing rates also generate direct billed time.**

To identify the extent of personnel time billed twice to Metro we reviewed the weekly internal CARP worksheets provided by LASD management. These worksheets covered October 10, 2010 to June 30, 2013. The following exhibit summarizes the TSB management, supervisory, and support personnel who CARP other support or line personnel positions internally for the fiscal years of 2011 through 2013.

<b>Exhibit 24</b>				
<b>Summary of Internal CARP Hours Provided by TSB Personnel</b>				
<b>Position</b>	<b>FY 2011</b>	<b>FY 2012</b>	<b>FY 2013</b>	<b>Totals</b>
Commander	40	16	16	72
Captain	40	120	64	224
Lieutenant	1,248	1,432	1,096	3,776
Sergeant	2,356	3,344	1,688	7,388
Bonus I	2,968	2,784	1,752	7,504
Deputy	680	848	672	2,200
MFTO	0	0	24	24
LET	696	0	0	696
<b>Total Hours</b>	<b>8,028</b>	<b>8,544</b>	<b>5,312</b>	<b>21,884</b>
<i>LASD management did not start tracking internal CARP hours until October 10, 2010.</i>				

As this exhibit shows, there were internal CARP hours of 8,028 in FY 2011, 8,544 in FY 2012 and 5,312 in FY 2013 totaled 21,884 CARP hours which were equivalent to 1,313,040 minutes.

The charges for CARP hours by internal TSB personnel were inappropriate. These costs were billed twice to Metro because the service unit billing rates already includes the cost of these personnel.

**Recommendation 42: Metro should require LASD to maintain internal TSB personnel (management, supervisory, and support) at the full time equivalent hours established in the Contract. If internal TSB personnel are used to fill TSB line positions, these minutes should not be billed to Metro. Metro should also**



seek reimbursement from LASD for personnel time that was billed twice during the contract period.

### **Record Keeping**

The contract between Metro and LASD requires LASD management to keep and maintain full and complete accounting books, in-service sheets, records of account of its costs and expenses claimed to be due and payable related to the performance of the services.

#### **Finding 43: LASD does not have an adequate time recording system and record keeping to track personnel's time records related to the Metro Contract.**

During the audit, we requested LASD provide records for us to perform analysis regarding CARP hours, vacant positions, and the actual hours worked by FTE personnel for FY 2010 to FY2013. LASD either did not maintain such records or most of the schedules that we requested had to be manually created by LASD.

As mentioned earlier in this report, LASD did not have the service minutes reports by personnel name or personnel identification number as required. The service minutes report is essential in order to trace the actual employees providing services. These reports were required for testing actual time worked. To meet our request LASD had to create a modified Service Minutes Detailed Reports (Form RAPS\_500E) by adding the personnel name in the service minutes reports.

LASD did not have reports showing the actual hours worked by the FTE sworn positions of Captain, Lieutenant, and Sergeant. LASD staff had to manually pull all the weekly Actual Hours Worked Reports over a period of four years by each position. LASD staff then added the hours shown in the weekly time reports in order to obtain the total actual hours worked by the Captains, Lieutenants, and Sergeants for the fiscal years 2010 to 2013.

We identified and noted numerous discrepancies between the Actual Hours Worked Reports and the personnel's actual signed timecards during our sample testing. After research, LASD management determined that the Actual Hours Worked Reports did not include flexed and overtime hours. These hours should have been added to the personnel's weekly Actual Hours Worked Reports. LASD staff had to review the time card records and add back the flexed and overtime hours to the actual hours worked in the excel worksheets. Because of the lack of good time record keeping system, LASD was not able to provide the information required to complete this audit within a reasonable time frame.

**Recommendation 43: Metro should require LASD to improve its time record keeping systems to allow it to provide important time records and reports within a reasonable time frame as required by this Contract.**



## **LASD Staffing Levels**

The contract between Metro and LASD specifies specific staffing levels for both line operations and support staff.

**Finding 44: The LASD has not provided the staffing levels required under the contract. There are continued vacancies in officer numbers and supervisory and managerial positions.**

This shortage of personnel has partly resulted from the bureaucratic process within the LASD for filling managerial and operational vacancies. Since the contract between Metro and the LASD is based on a specified number of assigned personnel, if vacancies are left unfilled there are field shortages among patrol personnel and Metro is charged for supervisory and managerial positions that are not actually in place. To address the patrol officer shortages, Deputies from other assignments are sent to work at TSB for a shift or two, often never being trained in transit policing strategies or procedures.

Since altering LASD's own personnel transferring processes does not fall under the purview of Metro's contractual agreements with LASD, the most efficient fix for this problem would simply be to overstaff at the beginning of the contract so vacancies that arise later will not bring the overall level of staffing down below operational requirements. Alternatively, TSB could maintain a list of Deputies pending for assignment to the TSB who are trained while the Bureau awaits vacancies. TSB might permanently maintain a list of 25 to 30 Deputies, determined by experience in TSB for the prior year. By maintaining a group of Deputies trained and ready for assignment, they can be immediately available when a vacancy occurs and ready to begin work the following day.

**Recommendation 44: Explore various options to mitigate historic shortages of personnel and expedite filling any vacancies.**

**Finding 45: The contract billing hours include the overhead cost for a number of special functions as well as supervisory and management personnel. Since LASD does not fill vacancies in these positions rapidly when a vacancy occurs, Metro is often charged overhead costs for positions not actually filled.**

Data has not been readily available to show when these overcharges have occurred. Invoices do not show deficiencies in the staffing for overhead positions.

When the required staffing levels have not been maintained for overhead positions during a billing period, the overhead rate should be adjusted downward to reflect this understaffing.

**Recommendation 45: Metro should require LASD to submit information on actual staffing of overhead and support positions should be submitted with each invoice for payment.**



### **Use of Cadre of Administrative Resource Personnel (CARP)**

The CARP Program developed by LASD initially focused on saving overtime funds by requiring administrative and support personnel to adjust their schedules to staff core service vacancies formerly filled by the use of overtime. The CARP Program was significantly broadened in scope Department-wide in May 2010. This required administrative and support personnel to work a new standard 32-hour week at their normal unit of assignment and then work one 8-hour shift, staffing a core service position wherever it was needed throughout LASD. The CARP Program has been used to staff a significant portion of the resources required under the contract between Metro and LASD.

#### **Finding 46: The CARP Program is detrimental to LASD TSB response times, community policing, transit expertise, and operations generally.**

As discussed above, the CARP program is designed to fill manpower shortages; however, it brings to TSB Deputies that are unfamiliar with the transit system and not invested in transit community policing. CARPing has eroded LASD efforts to maintain transit policing continuity among staff and also to maintain sufficient skills and experience in transit policing.

The problem with CARPing is as much about placement of untrained personnel in transit areas as it is about cost savings. Deputies who are not a part of the TSB do not have the same sense about the importance of transit policing and its impact on the overall community and flow of transit users to their destinations.

**Recommendation 46: Metro should require LASD to eliminate or minimize the assignment of CARP personnel to TSB. If it is not possible to end the practice, TSB should ensure that those Deputies that are CARPed to TSB receive special transit training before being assigned to duty.**

### **Resource Allocation Analysis**

A resource allocation analysis, which many police agencies conduct in regular intervals (often every five years), identifies the specialties that need to be supported and those that do not. It also sets forth the required distribution of personnel between the various functional areas of policing covered under the contract. Such an analysis also serves as the foundation for strategically based staffing.

#### **Finding 47: A resource allocation analysis and strategy for using the limited resources available to the Transit Services Bureau has never been undertaken.**

Under the recommended geographic structure, how personnel are used will change. Likewise, given the relatively small number of personnel assigned to the TSB, the analysis needs to consider the number of specialties and back-office functions that are currently in place.

There is also a need to carefully review the level of specialization that is provided within the TSB. There is a thin line between what specialties are required in the Bureau and





those that could be made available from the other Bureaus of the LASD or from other local law enforcement agencies. Some specialties, such as the canine teams, are clearly needed as they have a direct impact on counter-terrorism initiatives and capabilities; however, others should be carefully considered since they draw personnel away from the core need: providing for a visible policing presence throughout the jurisdiction in a way that focuses on problems that impact rider's perceptions of safety on the system.

Given that regular field duty is the most important function in improving public safety on the transit system, it is important that Metro understand the overhead costs of the contract and the level of specialization that is covered by the contract. A resource allocation analysis can identify if there are specialties that could better be provided by other police agencies. This issue must be linked to the development of the Transit Community Policing Plan, described previously, as well as the other requirements of the contract. It is also important that a regular resource allocation analysis and plan be developed and linked to the transit policing strategies for buses and rail.

Allocation of personnel to the various assignment areas (buses and rail) as well as specialized units must be carefully considered. The resource allocation analysis establishes the actual staffing factor so the TSB (the actual number of Deputies who report for work and number on leave) knows how many Deputies will actually report for work each day and how many Deputies can be allowed off for leave, such as vacation, if required staffing is to be maintained. The analysis must determine the optimum staffing of each area, and link this to calls for service and desired response times. Once completed, it can serve as a guide to how Deputies are assigned, provide a sequential priority list for assignments given sick and other leave patterns and ensure that key areas are not left uncovered during passenger peak periods of the day and week. The resource allocation analysis is an important investment for Metro given the size of the contract for policing services.

The resource allocation analysis will also determine the number of personnel required as new rail lines are added. While the policing strategy will determine the number of Deputies required for both rail lines and bus lines, the resource allocation analysis will build on the strategy by determining staffing requirements in order to ensure that those numbers of Deputies are fulfilled on a shift-by-shift basis. Strategy options can be presented for different levels of staffing under contract, but once a strategy is agreed to by Metro and TSB, it will be easy to determine the additional personnel required to provide service on new rail lines.

**Recommendation 47: Metro and LASD should conduct a resource allocation analysis that determines the best assignment pattern that meets the objectives set forth in the contract, and ensures staffing is strategic.**



### **Span of Control for Specialized Assignments**

Specialist assignments sometimes require only a few Deputies and at least one supervisor. Filling these positions requires sergeants at a greater ratio to Deputies than field assignments, creating substantial field shortages.

**Finding 48: The span of control for specialist assignments is incapable of providing sufficient command oversight for many of these assignments and draws sergeants away from the number authorized for field supervision. There should generally be a ratio of one sergeant to every seven officers in the field. Specialized units may have lower ratios, but these must not be considered in the context of the field supervisory ratio.**

The contract should provide for a ratio of one sergeant to seven officers in field units; then another number of sergeants should be added for those specialized units where a sergeant is required, even if the ratio is less than one to seven. This way, the proper number of supervisors will be available to cover all assignments in the TSB. The proposed resource allocation review can determine how many specialist positions are required and thus the total number of supervisors can be accurately determined.

**Recommendation 48: Metro should base the number of sergeants employed under the contract on the number required to maintain a ratio of one field supervisor to seven Deputies, as well as a supervisor being in charge of each specialized unit.**



## **Independent Audits and Reviews**

Previous audits and reviews provide valuable information on recommended changes to improve operations or outcomes. Without follow-up, these recommendations often are not implemented.

In following up on prior audits and reviews, we:

- ✓ Obtained and reviewed all prior audits and reviews conducted related to Metro safety and security in the past 8 years.
- ✓ Identified the current implementation status or progress made toward implementation for each prior audit or review recommendation.
- ✓ Assessed the current validity or applicability of prior audit or review recommendations not fully implemented.
- ✓ Developed conclusions, findings and recommendations.

Our data collection and analysis efforts were targeted toward providing answers to the following questions outlined in the Request for Proposals:

1. Determined whether Metro has implemented the recommendations in the report on Metro Transit Security prepared by a consultant on December 23, 2008, issued prior to the current contract.
2. Reviewed any other audits/reviews performed under this contract and determine if recommendations were implemented.

During our evaluation of past audits and reviews we found one previous review related to Metro safety and security, and an overall operations assessment of Metro that included a section on Metro Safety and Law Enforcement. The first was a review of Metro Transit Security conducted in 2008 with a report submitted in December 2008. This report was prepared and submitted by Sid Heal and included discussion and narrative in the areas of roles and responsibilities, information sharing, presentation of information on fare enforcement and graffiti, and coordination of the Metro Security function.

We have summarized the general findings and recommendations contained in the report narrative to facilitate following up on the implementation of the recommendations included. The following exhibit shows these findings, recommendations, the current status of these recommendations, and our follow-up comments.

<b>Exhibit 25</b> <b>Metro Transit Security Review Report</b> <b>Submitted by Sid Heal, December 2008</b>			
<b>Key Findings</b>	<b>Recommendations</b>	<b>Status</b>	<b>Comments</b>
There is no clear delineation of the roles and responsibilities for the two agencies (Metro	Clearly define separate and distinct roles and responsibilities for each agency (Metro Security and LASD).	Not Implemented	Attempts to clearly define roles and responsibilities through the L.A. Metro



<b>Exhibit 25</b> <b>Metro Transit Security Review Report</b> <b>Submitted by Sid Heal, December 2008</b>			
<b>Key Findings</b>	<b>Recommendations</b>	<b>Status</b>	<b>Comments</b>
Security and LASD). This results in disparate priorities and disjointed deployment priorities, as well as friction caused by shared responsibility for the same tasks and assignments.	Formalize the agreement in a letter of agreement signed by both agencies.  Develop a written, comprehensive strategy for the L.A. Metro Security function to provide essential focus to sharpen the efforts of both agencies, avoid conflict, establish accountability, and enhance cooperation.		Protective Services (LAMPS) initiative. However, this effort focused on developing a common mission and approach rather than distinct roles and responsibilities. Conflicting roles were continued.
Both LASD and LA Metro are given assignments that may require police action but with different levels of police powers.	Use less expensive security for saturation and enforcement of quality of life issues, while law enforcement is focused on prevention and detection of more serious crime as well as conducting investigations.	Partially Implemented	LASD Security Assistants added to provide saturation and quality of life / code of conduct enforcement. Role of Metro Security in these functions still undefined and unresolved.
Periodic reports leave much to be desired in providing a real understanding of what is going on, what is upcoming, or any method of identifying trends and anomalies over time. There is a conspicuous lack of futures forecasting, which could identify events, factors and influences that could affect deployments and concentrations of effort.	Develop, install, and maintain a system that would provide members of both agencies with the most current and comprehensive information possible in a format immediately useable by both. Develop an "extranet" site for the exchange of information that is limited to authorized parties from both agencies.	Not Implemented	Intelligence Led Policing (ILP), the LASD's approach to CompStat, provides some useful information sharing among the agencies. However, the information shared is limited, no real accountability is created, and there is little focus on developing meaningful strategies or tactics to address identified issues and concerns.
The approach to reporting on fare evasion and fare check enforcement using tables and pie charts does not present this information in a meaningful or useful	Change the reporting format for fare evasion and fare check saturation rates from the current tables and pie charts to one that will more readily provide planners and decision makers the ability to quickly compare influences and factors	Not Implemented	Changes in reporting format not implemented. However, fare enforcement tracking and reporting has been replaced by information from TAP.



<b>Exhibit 25</b> <b>Metro Transit Security Review Report</b> <b>Submitted by Sid Heal, December 2008</b>			
<b>Key Findings</b>	<b>Recommendations</b>	<b>Status</b>	<b>Comments</b>
manner.	with one another and over time.		
The approach to reporting on graffiti incidents and arrests using tables and bar charts does not present this information in a meaningful or useful manner, nor allow the identification of trends and anomalies over time.	Change the reporting format for graffiti incidents and arrests to separate these incidents from general vandalism, and from the current tables and bar charts to one that will more readily provide planners and decision makers the ability to quickly compare influences and factors with one another and over time.	Partially Implemented	More detailed reporting provided, but no evidence being effectively used.
More focus, attention, and cooperation is needed on developing and implementing effective strategies and best practices, estimating the impact of trends and anomalies, and preparing and planning for forecasted events and influences.	Conduct regular (at least quarterly) meetings focused on security issues at the management / executive level of both agencies. Conduct frequent meetings at the operator level to provide an open forum for exchanging information on effective tactics, techniques and procedures, as well as to build the camaraderie necessary for collaboration.	Not Implemented	Metro management and LASD command staff frequently hold meetings and participate in ILP meetings. However, formal executive level meetings are not standard practice.

The second review was an operations assessment of Los Angeles Metro conducted by Sam Schwartz Engineering, with a report (draft) issued in December 2011. This report included a brief section on Security and Law Enforcement as part of their review of Essential Operating Department Support.

The report did not specifically identify findings, but did include a number of recommendations. We have summarized the general findings and recommendations contained in the report narrative to the extent possible to facilitate following up on the implementation of the recommendations included. The following exhibit shows these findings, recommendations, the current status of these recommendations, and our follow-up comments.



<b>Exhibit 26</b> <b>Security and Law Enforcement Review</b> <b>Submitted by Sam Schwartz Engineering, December 2011.</b>			
<b>Key Findings</b>	<b>Recommendations</b>	<b>Status</b>	<b>Comments</b>
Officers in vehicles have very limited effectiveness in policing rail and bus lines. Approximately 48% of Deputy sheriff's assigned are to foot patrol.	Require the LASD Transit Services Bureau to assign 90% of its Deputy Sheriff's to foot to patrol on specific zones on the rail system and to a bus detail.	Not Implemented	Deployment strategy has not been fully developed, and has not significantly changed since this assessment.
No Finding or discussion in the report.	Reallocate LASD coverage to the Blue and Green Lines.	Not Implemented	Not enough information or analysis in report to comment.
No Finding or discussion in the report.	Develop a cost estimate for forming an in-house Metro police force. Use in-house estimate in negotiating the FY 2013 LASD option.	Not Implemented	Not enough information or analysis in report to comment.
The number of citations issued by Security Assistants is not indicative of an intensive degree of fare enforcement activity.	Use Security Assistants in large groups to do "fare sweeps" in which virtually all customers in a station are checked rather than deploying SA's individually or in pairs.	Partially Implemented	Security Assistants are used to conduct both ongoing fare checks and periodic larger scale fare sweeps.
No finding or discussion in the report.	Issue citations for fare evasion instead of issuing warnings in every case.	Partially Implemented	Metro has developed a zero tolerance policy for fare evasion, stating that citations will be issued in all cases. However, both Security Assistants and Deputies continue to use some discretion to issue warnings rather than citations.
No finding or discussion in the report.	Consider using the funding now allocated to Security Assistants to hire a smaller number of armed and sworn personnel.	Not Implemented	The cost differential between Security Assistants and sworn personnel, as well as ongoing reluctance from sworn personnel to fare enforcement, have made this strategy inadvisable.



**Finding 49: There is no indication that recommendations made in prior reviews have been followed up or implemented.**

The reviews and audits conducted on Metro safety and security operations have been very limited. Nonetheless, it is important to follow through on considering the issues identified, reviewing recommendations made, and taking steps to implement those recommendations that have merit and would improve operations. There is no indication that any of this has occurred with either of the two prior reviews that have been conducted.

**Recommendation 49: Metro should consider formally reviewing and following up on issues identified and recommendations made in all reviews or assessments completed regarding safety, security or law enforcement services.**

#### **Periodic Contract Performance Audits**

**Finding 50: Metro has not taken advantage of periodic contract performance audits of the services provided by LASD as a contract compliance tool.**

Periodic audits of LASD performance can be very useful tools for making sure that contract requirements are being met, required services are being adequately provided, and contract billings and services are consistent. Until this current audit, Metro has not conducted any kind of formal audit of the LASD contract.

**Recommendation 50: Metro should consider conducting periodic contract performance and compliance audits to ensure contract requirements are fully met, required services are being adequately provided, and contract billings are consistent with services provided.**



## **New Contract**

Metro is currently in the process of preparing a new contract for safety and security services that will define how these services are to be provided, and will likely involve the expenditure of over \$400 million in Metro funds over the next 5 years. It is essential that any lessons learned through the current contract period be incorporated through changes in the new contract. The following chart provides a reference for staff preparing the new contract in order to ensure that findings and recommendations in this report are incorporated:

<b>Exhibit 27</b>			
<b>Summary of All Findings and Recommendations and Potential Contract Stipulations</b>			
<b>No.</b>	<b>Finding</b>	<b>Recommendation</b>	<b>Potential Contract Stipulations</b>
1	There is no specific Transit Community Policing Plan or Program and few defined responsibilities for transit community policing participants.	Metro should require LASD to develop a comprehensive Transit Community Policing Plan that clearly articulates the expectations and responsibilities of everyone associated with community policing responsibilities on the Metro system.	Require LASD to submit a Transit Community Policing Plan that is subject to Metro approval or face significant penalties.
2	There is no planning or stated goals for community policing in a transit setting, including no reflection on the unique challenge of community policing for a transit population, no focus on quality of life issues, and a lack of service-orientation.	Metro should work with LASD to Identify principles of community policing that are tailored for the transit environment as part of the core Transit Community Policing Plan. These principles should include 1) "felt presence," 2) community partnership, 3) crime prevention (principally through a focus on quality of life issues), 4) service-orientation, and 5) problem-solving.	Require the Transit Community Policing Plan to include community policing principles and address how these concepts will be integrated into TSB operations.





Exhibit 27 Summary of All Findings and Recommendations and Potential Contract Stipulations			
No.	Finding	Recommendation	Potential Contract Stipulations
3	Transit Services Bureau assignment is not seen as a prestigious or desirable assignment.	Metro should require LASD to develop transit security operations as a specialized expertise within the department, complete with rigorous standards and training requirements.	Require special in-service training for personnel assigned to TSB. Limit or eliminate the amount of man-hours that LASD is allowed to fill with non-specially trained personnel.
4	The Transit Services Bureau does not effectively enforce focused accountability.	Metro should require LASD to foster a culture of true accountability within TSB, including restructuring the Intelligence-Led Policing process so it provides a true system of accountability.	Require restructuring of ILP meetings so that they better resemble CompStat best practices. Require the presence of approved Metro personnel at ILP meetings.
5	LASD has not developed a bus operations strategy.	Metro should require LASD to develop a bus operations policing strategy that reflects the nature of the challenges faced in addressing crime and disorder on buses, reflects the generally limited staffing available for bus policing and makes maximum use of local police resources in responding to serious bus crime and disorder incidents when a LASD Deputy is not nearby.	Require LASD to submit an explanation of its strategy for implementing community policing principles and other objectives identified by Metro on the bus system.



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<b>No.</b>	<b>Finding</b>	<b>Recommendation</b>	<b>Potential Contract Stipulations</b>
6	The size of the transit service area (jurisdiction) makes it impossible for Deputies assigned to the Transit Services Bureau to be first responders to all incidents of crime and disorder that occur on the bus network.	Metro should require the LASD to identify how the concerns of Metro will be addressed in its bus policing strategy. This strategy needs to be developed in collaboration with Metro bus managers and other jurisdictions through which the bus network runs.	Require LASD to collaborate with Metro bus managers and engage in discussions with municipalities and local police departments to provide efficient local law enforcement responses to emergency calls for service emanating from buses.
7	The current Transit Services Bureau, organized around rail lines, does not provide the geocentric focus for policing the bus network, which is largely related to geography and the neighborhoods through which the bus routes pass.	Metro should require LASD to reorganize the transit policing structure to provide geopolitical and neighborhood-based coverage for bus routes and neighborhood rail stations, and line-based coverage for rail lines and on-line crimes.	Require LASD to conduct a personnel allocation study and create a personnel allocation that would consist of at least four policing areas.
8	LASD has not developed a rail operations policing strategy.	Metro should require LASD to develop a rail policing strategy that identifies how the challenges of providing a policing presence while addressing the need for response to rail crime and related incidents can best be met.	Require LASD to submit an explanation of its strategy for implementing community policing principles and other objectives identified by Metro on the rail system, including on trains and in stations.



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9	LASD has not adequately addressed some of the order maintenance issues that have been of concern to Metro management, particularly related to activities in Union Station.	Metro should require LASD, as part of its rail policing strategy, to outline actions that will effectively address the problems associated with homelessness, disorderly conduct and other issues in stations that unsettle the public using transit.	Require that LASD address specific problem issues and places in its rail policing strategy.
10	LASD rail policing operations do not include effective proximity patrolling or training Deputies to have a "felt presence".	Metro should require LASD to train Deputies assigned to transit in proximity patrolling (i.e., patrolling independently of each other while in close proximity) and how to create a "felt presence" when patrolling trains and stations.	Require use of proximity patrolling and require that proximity patrolling be part of the special in-service training required of TSB officers. Require special training in order to boost "felt presence."
11	Metro's Strategy for enforcement of fare evasion must be revisited and alternative structural elements need to be considered.	Metro should require LASD to perform a comprehensive review of the fare enforcement strategy to address the variety of roles Deputies and Metro employees should play, as well as how to regularly measure compliance, how to target areas with greatest non-compliance, and how to reduce the confusion passengers face regarding tapping their cards.	Require that LASD cooperate in a review of fare enforcement strategy. Create specific provisions that require LASD to enforce fare compliance in accordance with the strategy devised by Metro.



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12	The reported LASD response time data indicate that response to incidents generally meets targeted goals, but the data do not provide an accurate picture of actual response times.	Metro and TSB should consider response times to be the time from when the call is received to the time when the Deputy actually has contact at the incident (including all of the bulleted steps above) so that there is an accurate picture about how long it takes Deputies to arrive on the scene when a call has been received.	Require LASD to report response times that include all steps from call answering to an officer being physically present at the scene of an incident.
13	The Communications Center facilities are inadequate for effective receipt and dispatching of calls for service and tracking unit vocation and availability.	Metro should work with LASD to find expanded quarters for the TSB Communications Center so that there is sufficient workspace and structure for effective processing of calls for service and tracking of unit status and location.	Require and assist LASD to move it Communications Center to a more suitable location.



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<b>No.</b>	<b>Finding</b>	<b>Recommendation</b>	<b>Potential Contract Stipulations</b>
14	Analysis of response times for bus and rail calls is inadequate, and data is not presented in a manner that can be used for identifying ongoing issues for improvement.	Metro should require LASD to amend the Monthly Report to include the actual time that calls are received and units arrive on scene, and ensure that a comparison of response times measured by calls received to responding units on scene is included in every Monthly Report and presented at every ILP meeting.	Require the TSB to amend the Monthly Report to reflect the method of calculating response time indicated in item 12. Require that the TSB present this data in every Intelligence Led Policing meeting.
15	TSB does not have standard procedures in place to transfer emergency calls for service to local police agencies.	Metro should require TSB to establish standard protocols for transferring emergency calls for service to local police agencies.	Require the TSB to work with local police agencies to establish standard protocols for transferring emergency calls for service.
16	Transit call-takers and dispatchers receive inconsistent training and no formal training relating to transit operations.	Metro should require LASD to develop a policy and procedure manual for TSB transit communications and require LASD to institute minimum training standards and special training for Deputies and technicians assigned to call taking and dispatch for transit operations.	Require TSB to institute minimum training standards and special training for Deputies and technicians assigned to call taking and dispatch for transit operations.



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<b>No.</b>	<b>Finding</b>	<b>Recommendation</b>	<b>Potential Contract Stipulations</b>
17	TSB's deployment practices do not optimize response times and require consistent evaluation to determine whether additional changes can be made to reduce response times while maintaining cost-efficiency and officer safety.	Metro should require LASD to conduct regular analysis to determine whether amending its deployment practices can help reduce incident response times.	Require TSB to conduct regular analysis of deployment practices to examine whether changes can help reduce incident response times.
18	Metro needs to substantially strengthen and enhance its oversight of LASD contract performance.	Metro should develop a comprehensive plan and methodology for oversight of LASD's performance under the contract and develop a staffing plan for implementing the contract oversight plan.	Metro develop a formal plan to oversee LASD contract requirements, including monitoring of performance and all invoices submitted by LASD. Secure a staff with sufficient personnel for carrying out this monitoring.
19	LASD has not met many of the targets for performance indicators established including crime reduction, continuity of staff, fare enforcement saturation, and activity rates.	Metro and LASD should work together to develop and adopt a comprehensive set of performance indicators, and ensure that performance on these indicators is periodically measured and reported to both Metro Executives and the Metro Board.	Require that LASD cooperate to formulate and review performance indicators on a regular basis.



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<b>No.</b>	<b>Finding</b>	<b>Recommendation</b>	<b>Potential Contract Stipulations</b>
20	Crime on the Metro system is underreported by not conforming with Uniform Crime Reporting (UCR) standards, nor including crimes responded to and handled by other law enforcement agencies.	Metro should require LASD to revise its approach to reporting crime on the Metro system to conform with the FBI's Uniform Crime Reporting standards and to include crime responded to and handled by municipal law enforcement agencies.	Require that LASD revise its reporting on crime on the Metro system in accordance with UCR standards and ensure that the figures include those crimes handled by municipal agencies.
21	The current contract with LASD does not include provisions for penalties nor incentives based on actual performance.	Metro should identify specific critical elements of the contract with LASD that are essential and define specific penalties to be imposed if those essential elements are not adequately provided by LASD. Metro should also consider defining specific incentives for exceeding certain critical performance metrics.	Define specific penalties to be imposed if critical performance metrics are not met. Also consider defining specific incentives for exceeding established goals.



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<b>No.</b>	<b>Finding</b>	<b>Recommendation</b>	<b>Potential Contract Stipulations</b>
22	The LASD personnel in the Bus Operations Center (BOC) can directly dispatch LASD resources, and communicate directly with both bus operators and LASD dispatched personnel. This direct assignment of LASD personnel to the BOC has improved coordination and communication, and reduced call processing time when law enforcement resources are needed to respond to bus incidents.	Metro and LASD should continue assigning LASD personnel in the BOC who can directly dispatch LASD resources, and can directly communicate with both bus operators and LASD dispatched personnel.	Require LASD to assign personnel to the BOC as a contractual obligation.
23	Communication and coordination between ROC and LASD resources is indirect and through the telephone resulting in potential loss of critical information and delays in response.	Metro and LASD should work together to co-locate LASD personnel within rail operations with the capability to communicate directly with both rail operations and LASD dispatched personnel consistent with the approach used in the Bus Operations Center.	Cooperate with LASD to co-locate all bus and rail dispatch personnel.
24	LASD personnel are provided reasonable access to video recorded throughout the Metro system to support their law enforcement and investigative needs.	Metro and LASD should continue to work together to improve the coverage of the Metro system with video systems and further expedite the process for retrieval of requested video recordings.	LASD cooperation in identifying methods for improving video system and the process for video footage retrieval.





<b>Exhibit 27</b>			
<b>Summary of All Findings and Recommendations and Potential Contract Stipulations</b>			
<b>No.</b>	<b>Finding</b>	<b>Recommendation</b>	<b>Potential Contract Stipulations</b>
25	The current mobile phone validator used by LASD personnel to check TAP fares is inadequate and has limited functionality.	The Metro TAP Program, Safety and Security, and LASD should work together to develop new applications and capabilities for the new mobile phone validator including for citation issuance, checking wants and warrants, and providing critical information.	Require LASD cooperation in developing functionality for the mobile phone validator, checking for wants and warrants, and systems providing other critical information.
26	LASD personnel do not have adequate access to information on the layout of Metro facilities (blueprints, etc.) to facilitate tactical response to critical incidents.	Metro and LASD should work together to identify the specific needs and requirements for information on the layout of Metro facilities (blueprints, etc.) to facilitate tactical response to critical incidents for LASD. An approach to provide this information in an electronic format that is up to date and easily accessible should be developed.	Cooperate with LASD to provide necessary information such as blueprints for use in tactical responses and critical incidents.
27	Investigations and dispositions of personnel complaints made against Sheriff's Department Transit Services Bureau personnel are not consistent with industry best practices.	Metro should work with LASD to revise its approach to investigating and concluding on allegations made to include specific conclusions of fact using the four standard categories of exonerated, unfounded, not sustained, or sustained.	Require that LASD revise its personnel complaints procedure to render one of four standard outcomes: Exonerated, Unfounded, Not Sustained, or Sustained.



<b>Exhibit 27</b>			
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<b>No.</b>	<b>Finding</b>	<b>Recommendation</b>	<b>Potential Contract Stipulations</b>
28	Timelines established by LASD policy for sending acknowledgement and outcome letters are not met for most complaints.	Metro should require LASD to ensure a more effective method of monitoring and enforcing the required timelines for sending acknowledgement and final outcome letters to individuals submitting complaints.	Require that the LASD implement a tracking system to monitor complaint acknowledgement and final outcome letters. Create incentives for LASD to meet performance goals in complaint management.
29	Significant numbers of LASD personnel have multiple personnel complaints, including complaints for discourtesy. However, performance mentoring, the LASD approach to improving employee work performance issues, has been minimally used within TSB.	Metro should require LASD TSB to significantly expand the use of the LASD Performance Mentoring Program for employees with numerous personnel complaints, uses of force, or other indicators of potential concern.	Require LASD to create a pilot program that automatically places officers into the Performance Mentoring Program upon reaching a certain number of complaints.
30	Roles and responsibilities of Metro Security have not been clearly or appropriately defined, and in some instances, current roles extend beyond the authority and common practice of security officers.	Metro should develop clear and appropriate roles and responsibilities of Metro Security and develop a written strategy for the Metro Security function. In developing this strategy, Metro should evaluate the use of Metro Security staff to perform fare enforcement, issue transit citations, and perform other non-law enforcement functions.	Require LASD cooperation in evaluating the role of the Metro Security function.



<b>Exhibit 27</b>			
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<b>No.</b>	<b>Finding</b>	<b>Recommendation</b>	<b>Potential Contract Stipulations</b>
31	Many of the contract requirements regarding LASD oversight of Metro Security (Watch Commander oversight, training, etc.) have not been implemented.	Metro should consider removing the requirements in the current contract focused on integrating the procedures, training, and operations of Metro Security and LASD from future contracts.	Remove the requirements in the current contract focused on integrating the procedures, training, and operations of Metro Security and LASD from future contracts.
32	The dual chain of command created by assignment of an LASD Lieutenant as Director of Metro Security, while command and control is assigned to the Metro DEO, has not been effective in managing and supervising Metro Security.	Metro should consider creating a Metro position of Director of Security to replace the current LASD Lieutenant, providing unified command for Metro Security under this position, and requiring ongoing communication and coordination with LASD as one of the key responsibilities of this position.	Require ongoing communication with the Metro Director of Security as part of the new contract with LASD.
33	Lack of clarity over appropriate regulatory requirements and oversight of Metro Security Officers, and compliance with these requirements, creates substantial operational and liability exposure.	Metro, with the assistance of LASD, should clarify appropriate regulatory requirements and oversight of Metro Security Officers, and ensure training, policies, and operations are adequate to minimize operational and liability exposure.	Require LASD assistance in identifying appropriate regulatory requirements and oversight of Metro Security Officers and ensuring that training, policies, and operations are adequate to minimize operational and liability exposure.



<b>Exhibit 27</b>			
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<b>No.</b>	<b>Finding</b>	<b>Recommendation</b>	<b>Potential Contract Stipulations</b>
34	The payments made to LASD for FY 2011 exceeded the Board approved amount and contract value by \$59,368.	Metro management should ensure payments made to LASD are capped at the Board approved amount and the contract value for each fiscal year. LASD should reimburse Metro for the overpayment of \$59,368 for FY2011, or Metro should obtain Board approval for the amount paid in excess of the Board approved amount.	Metro Management will have a record setup in the FIS accounting system to keep track of the year-to-day payments of expenses billed by LASD within a particular fiscal year. Any expenses paid to LASD over the Board approved amount should be returned to Metro immediately upon request.
35	Contract service minutes billed by LASD were not adequately supported by documentation provided for detailed testing as part of this audit.	Metro should require LASD to comply with contract requirements to provide modified Service Minutes Detailed Reports (Form RAPS_500E) which show the service minutes provided by personnel's names with the monthly contract service billing.	Require LASD to provide the modified Service Minutes Detailed Report (Form RAPS 500E) with personnel's name for services provided in addition to other information being required in the current contract.



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36	The current invoice review process for LASD billings and payments by Metro Management needs to be expanded.	Metro management should require LASD to provide adequate supporting documents for each monthly service contract billing, and selectively review LASD personnel timecards, overtime slips, and daily worksheets to ensure LASD personnel time records billed are supported with adequate documentation.	Metro Management will select certain personnel's billed work hour samples from LASD's monthly billing records to review the personnel's actual time cards, overtime slips and daily worksheets.
37	LASD was not able to adequately provide documentation for some billed service hours (minutes), nor provide adequate responses for questioned and requested timecards and daily worksheets within the time period of this audit.	Metro should require LASD to ensure that adequate and accurate documentation of hours and minutes billed to Metro under the contract is readily available to support the amounts billed to Metro.	Require LASD to have the supporting documentation for the expenses billed readily available for review upon request by Metro.
38	The level of staffing provided by LASD varies substantially from month to month, while billings are at a one-twelfth of the annual contract amount.	Metro should require LASD to provide a more stable monthly level of both sworn and civilian staffing, and should bill for actual minutes provided, and adjust its billing accordingly if LASD reduced its personnel assigned to TSB in a particular month.	Require LASD to submit billings based on the actual service minutes provided, or expenses actually incurred.



Exhibit 27 Summary of All Findings and Recommendations and Potential Contract Stipulations			
No.	Finding	Recommendation	Potential Contract Stipulations
39	LASD did not adjust rates billed for services or units when management, supervisory, or support positions included in billing rates were vacant.	Metro should require LASD to adjust the monthly service contract invoiced amount billed to Metro if the FTE positions of the captain, lieutenant, sergeant and other civilian support positions as set by the Contract were not actually provided during the billing period.	Require LASD to submit a report with the vacant positions with the monthly billing and such billing should have been adjusted accordingly for the reduction of work force.
40	The actual hours worked by management and supervisory personnel included in billing rates were much lower than the hours set by the Contract for FY 2010 to FY 2013.	Metro should require LASD adjust the monthly service contract invoiced amount billed to Metro based on the number of management and supervisory hours actually provided.	Require LASD to adjust the monthly service contract invoiced amount billed to Metro based on the number of management and supervisory hours actually provided.
41	LASD did not maintain adequate records of time spent at TSB by CARP personnel. In addition, CARP time exceeded the target maximum rate of 10%.	Metro should require LASD to maintain adequate records of the service minutes provided by CARP personnel to ensure compliance with maximum CARP percentage requirements. Metro should also consider reducing the current CARP maximum rate of 10%, or eliminating CARP personnel.	Require LASD to provide the CARP personnel records with the monthly billing. The monthly billed amount should be reduced if the compliance with maximum CARP percentage requirements are not met.



<b>Exhibit 27</b>			
<b>Summary of All Findings and Recommendations and Potential Contract Stipulations</b>			
<b>No.</b>	<b>Finding</b>	<b>Recommendation</b>	<b>Potential Contract Stipulations</b>
42	Some LASD personnel time was billed twice to Metro when personnel whose costs are included in the billing rates also generate direct billed time.	Metro should require LASD to maintain internal TSB personnel (management, supervisory, and support) at the full time equivalent hours established in the Contract. If internal TSB personnel are used to fill TSB line positions, these minutes should not be billed to Metro. Metro should also seek reimbursement from LASD for personnel time that was billed twice during the contract period.	Require LASD to provide the position vacancy reports with the monthly service billing. If internal TSB personnel are used to fill TSB line positions, these minutes should not be billed to Metro.
43	LASD does not have an adequate time recording system and record keeping to track personnel's time records related to the Metro Contract.	Metro should require LASD to improve its time record keeping systems to allow it to provide important time records and reports within a reasonable time frame as required by this Contract.	Require LASD to have a time record keeping systems in order to generate various reports readily available for review upon Metro's request.
44	The LASD has not provided the staffing levels required under the contract. There are continued vacancies in officer numbers and supervisory and managerial positions.	Explore various options to mitigate historic shortages of personnel and expedite filling any vacancies.	Use historical absence and turnover rates in developing the staffing levels of the contract.



<b>Exhibit 27</b>			
<b>Summary of All Findings and Recommendations and Potential Contract Stipulations</b>			
<b>No.</b>	<b>Finding</b>	<b>Recommendation</b>	<b>Potential Contract Stipulations</b>
45	The contract billing hours include the overhead cost for a number of special functions as well as supervisory and management personnel. Since the LASD does not fill vacancies in these positions rapidly when a vacancy occurs, Metro is often charged overhead for positions not actually filled.	Metro should require LASD to submit information on actual staffing of overhead or support positions with each invoice for payment.	Require LASD to submit information on actual staffing of overhead and support position staffing with each invoice and payment.
46	CARPing is detrimental to LASD TSB response times, community policing, transit expertise, and operations generally.	Metro should require LASD to eliminate or minimize the assignment of CARP personnel to TSB. If it is not possible to end the practice, ensure that those deputies that are CARPed to TSB receive special training and are CARPed to LASD on a regular basis as opposed to CARPing any deputies to TSB.	Require LASD to provide some training to deputies CARPed to TSB assignment and ensure that those deputies are CARPed on a semi-regular basis rather than Deputies with little experience with transit policing. Ensure that the contract reimburses LASD at a lower rate for hours performed by CARPing deputies rather than those permanently assigned to the TSB.





<b>Exhibit 27</b>			
<b>Summary of All Findings and Recommendations and Potential Contract Stipulations</b>			
<b>No.</b>	<b>Finding</b>	<b>Recommendation</b>	<b>Potential Contract Stipulations</b>
47	A resource allocation analysis and strategy for using the limited resources available to the Transit Services Bureau has never been undertaken.	Metro and LASD should conduct a resource allocation analysis that determines the best assignment pattern that meets the objectives set forth in the contract, and ensures staffing is strategic.	Require that LASD lead in the development, with cooperation of Metro, on a resource allocation analysis and strategy.
48	The span of control for specialist assignments is incapable of providing sufficient command oversight for many of these assignments and draws sergeants away from the number authorized for field supervision. There should generally be a ratio of one sergeant to every seven Deputies in the field. Specialized units may have lower ratios, but these must not be considered in the context of the field supervisory ratio.	Metro should base the number of sergeants employed under the contract on the number required to maintain a ratio of one field supervisory ratio of one to seven Deputies, as well as a supervisor being in charge of each specialized unit.	Require a number of sergeants commensurate with a span of control of one to seven Deputies in ordinary assignments, as well as one supervisor in each specialized unit.
49	There is no indication that recommendations made in prior reviews have been followed up or implemented.	Metro should consider formally reviewing and following up on issues identified and recommendations made in all reviews or assessments completed regarding safety, security or law enforcement services.	Create incentives for LASD performance in areas of weakness uncovered by previous audits and reviews.



<b>Exhibit 27</b>			
<b>Summary of All Findings and Recommendations and Potential Contract Stipulations</b>			
<b>No.</b>	<b>Finding</b>	<b>Recommendation</b>	<b>Potential Contract Stipulations</b>
50	Metro has not taken advantage of periodic contract performance audits of the services provided by LASD as a contract compliance tool.	Metro should consider conducting periodic contract performance audits to ensure contract requirements are fully met, required services are being adequately provided, and contract billings are consistent with services provided.	LASD participate in the conduct of periodic performance audits to gauge whether contract stipulations are being fulfilled and whether billings are consistent with services rendered.



## **Appendix A: Review of Contract Requirements**

The following is a listing of each of the specific requirements contained in the contract between Metro and LASD by category. For each requirement we identified whether it was the responsibility of Metro or LASD, whether the requirement had been met during the contract period (Yes, No, or Partial), and provided comments to explain or provide more information on how the requirement was met or not met.



<b>Exhibit 28</b>				
<b>Administrative Requirements</b>				
	<b>Requirement</b>	<b>Responsibility</b>	<b>Requirement Met?</b>	<b>Comments / Documentation</b>
1	Respond to requests for advisement on augmenting policing services.	LASD	Yes	July 1 each year meet to discuss contract augmentation. Added a few positions to last contract. Examples include LET in the BOC, TAP Card Sergeant, etc. Have also added staffing for new lines such as the Expo Line.
2	Complete staffing allocation and budgeting process.	LASD	Yes	Contract renewal and updated annual model completed prior to the Metro budget presented to the Board.
3	Pay parking fees for LASD personnel at Gateway Headquarters.	LASD	Yes	LASD pays the parking for employees, included in S&S and passed back to Metro.
4	Regular monthly invoices, including supporting documentation.	LASD	Yes	Copies of monthly invoices.
5	Respond to any unilateral changes to TCPP that do not exceed 10% of annual base budget.	LASD	Yes	There have been no unilateral changes.
6	Maintain full and complete records.	LASD	Yes	Have copies of monthly invoices, timecards, and overtime slips.
7	Maintain insurance requirements.	LASD	Yes	Recent actuarial report on liability insurance. Identified difference in actual liability and projected liability.



<b>Exhibit 28</b>				
<b>Administrative Requirements</b>				
	<b>Requirement</b>	<b>Responsibility</b>	<b>Requirement Met?</b>	<b>Comments / Documentation</b>
8	Respond to any Metro requests to change services.	LASD	Yes	Annual contract model changes. Also add personnel as needed. Example is the addition of two dedicated mental health evaluation teams.
9	Help Metro ensure that relevant advertising is factual.	LASD	Yes	Metro runs ads related to safety and security by LASD. Examples include "See Something, Say Something" campaign.
10	Refer all public inquiries to Metro Public Affairs.	LASD	Yes	Training of Watch Commanders includes referring media inquiries to Metro Public Affairs.
11	Cooperate in any independent audits.	LASD	Yes	During the current IG audit, LASD has been very cooperative.



Exhibit 29 Staffing Requirements				
	Requirement	Responsibility	Requirement Met?	Comments / Documentation
1	Provide key personnel for services, including commanding officer of Office of Homeland Security and designees of Captain's rank or above.	LASD	Yes	Current staffing plan
2	LASD workers have sufficient skills and experience.	LASD	Partially	Most LASD workers have sufficient skills and experience, with exception of CARP personnel and temporary personnel.
3	Staff fully patrol trained.	LASD	Partially	Assigned to a TSB Training Officer – Fully patrol trained after completion of Phase 6. FTO program developed after contract with approval of Metro.
4	Provide sworn personnel with full legal authority.	LASD	Yes	All Sworn have full POST certification unless relieved of duty (ROD). Have one person on ROD, not charging minutes. Employees injured on duty (IOD) that are light duty are still generating minutes.
5	Demarcate TCPP personnel with distinctive pin or other indicator.	LASD	Partially	Metro pins were originally issued by Metro – ran out and have not purchased more. Some of the cars have the Metro logo - some do not.
6	Endeavor to maintain continuity among staff	LASD	Partially	Have made efforts – but CARPing



<b>Exhibit 29</b>				
<b>Staffing Requirements</b>				
	<b>Requirement</b>	<b>Responsibility</b>	<b>Requirement Met?</b>	<b>Comments / Documentation</b>
	assigned.			has been detrimental.
7	Span of control of 1 supervisor (Line Sergeant) to 7 Deputies.	LASD	No	Generally much lower due to vacancies. Some far higher due to specialist assignments.
8	Select the TSB Commanding Officer.	Metro CEO	Yes	With recent reassignment of the TSB Commander, Metro was given a list of three candidates for the new commander, interviewed each, and selected the new Commander.
9	Streamlined management structure, with an innovative and creative organizational design.	LASD	No	Current structure dividing TSB into North and South, with Bureau Headquarters function with North, is not an effective structure.



Exhibit 30 Metro Security Requirements				
	Requirement	Responsibility	Requirement Met?	Comments / Documentation
1	Command and control of Metro Security Department.	Metro DEO	Yes	Metro DEO oversees the Metro Security Department.
2	Oversight, guidance, direction and support of the Metro Security Program.	Metro DEO	Yes	Metro DEO oversees the Metro Security Department.
3	Command, Control and Coordination of Metro Security Officers.	LASD Watch Commanders	No	Metro Security has its own Lieutenants who serve as watch commanders for Metro Security.
4	Complement Metro Security.	LASD	Yes	As needed.
5	Co-locate LASD and Metro Security.	Metro and LASD	No	There is currently a wall between the two entities headquarters. Plans are to remove the wall at some point.
6	Conduct unified briefings of LASD and Metro Security.	Metro and LASD	No	Did initially, discontinued because of different start times, confidential information, etc.
7	Conduct unified training of LASD and Metro Security.	Metro and LASD	No	Initially did, discontinued because of different training requirements and confidential information for sworn personnel.
8	Incidents requiring sworn peace officer responsibility of LASD or local police.	LASD	Yes	LASD and local police clearly responsible for law enforcement.
9	Security units handle issues within scope of duties and capabilities.	Metro	Partially	Metro Security currently exceeds their "observe and report" scope by responding to calls for service, etc.
10	Security and Law Enforcement operations fully	Metro and	Partially	No joint communications or





<b>Exhibit 30</b>				
<b>Metro Security Requirements</b>				
	<b>Requirement</b>	<b>Responsibility</b>	<b>Requirement Met?</b>	<b>Comments / Documentation</b>
	coordinated, complimentary, and mutually supportive.	LASD		operations. Operations are coordinated and supportive as needed.
11	Provide "back-up" for Metro security officers.	LASD	Yes	As needed.
12	Provide supplemental security for Metro Board meetings, Metro officials, or visiting dignitaries upon Metro request.	LASD	Yes	Boardroom under Metro Security – if anticipate protests LASD assists.
13	Develop integrated training and operational procedures that include, but are not limited to, Metro's Security Department. Training will include tactics for interception of moving and standing buses and bus take-downs.	LASD	No	Initially did integrated training, discontinued because of different training requirements and confidential information for sworn personnel.



<b>Exhibit 31</b>				
<b>Contract Oversight and Performance Standard Requirements</b>				
	<b>Requirement</b>	<b>Responsibility</b>	<b>Requirement Met?</b>	<b>Comments / Documentation</b>
1	Oversee and manage the overall Metro Transit Community Policing Program.	Metro DEO	Yes	Oversight of LASD and policing program should be enhanced.
2	Provide guidance, direction and support.	Metro DEO	Yes	Oversight of LASD and policing program should be enhanced.
3	Establish priorities for security resource allocation.	Metro DEO in consultation with LASD	Partially	Agree on resources through the update of the contract model. Otherwise, Informal priority setting process.
4	Develop annual performance objectives and goals for the Transit Community Policing Program.	Metro DEO in consultation with LASD TSB Commander	Yes	Performance objectives and targets established for the last contract year.
5	Contract Management of LASD.	Metro DEO	Partially	Oversight of LASD and policing program should be enhanced.
6	Appointment of the TSB Commanding Officer.	Metro CEO	Yes	Commanding Officer selected jointly by LASD and Metro CEO.
7	Ensure Transit Community Policing goals are met.	Metro DEO	Partially	Oversight of LASD and policing program should be enhanced.



<b>Exhibit 32</b> <b>Community Policing Requirements</b>				
	<b>Requirement</b>	<b>Responsibility</b>	<b>Requirement Met?</b>	<b>Comments / Documentation</b>
1	Oversee and manage the overall Metro Transit Community Policing Program.	Metro DEO	No	No real community policing program. Oversight of LASD and policing program should be enhanced.
2	Provide guidance, direction and support.	Metro DEO	No	Oversight of LASD and policing program should be enhanced.
3	Submit an annual Transit Community Policing Plan for approval by the Metro DEO.	LASD	No	No plan in existence or planned but there is recognition now that a transit policing strategy is needed.
4	Develop annual performance objectives and goals for the Transit Community Policing Program.	Metro DEO in consultation with LASD TSB Commander	Partially	No plan in existence, but Metro DEO has made objectives clear in meetings with TSB management personnel. Many Deputies in TSB understand these priorities and try to act on them.
5	Develop a program focused on prevention and quality of life.	Metro and LASD	No	Resistance among TSB personnel to addressing quality of life issues.
6	Focus on quality of life crime, including utilization of Broken Windows Theory.	LASD	No	No community policing plan; general resistance within TSB to actively participating in addressing these problems.
7	Incorporation of "zero tolerance" approaches to	LASD	No	No effective zero tolerance



	crimes that would allow more serious crime to gain a foothold.			approach.
8	Focus on problem-solving.	LASD	Partially	No transit policing strategy.
9	Participate in community meetings to promote awareness of community transit policing services, transit-related safety, and citizen concerns.	LASD	Partially	Captains and some lower level Deputies do engage with some community groups.
10	Conduct safety, security, crime prevention, and homeland security training for transit patrons and those impacted by the transit system.	LASD	Partially	No widespread program for training in these areas.
11	Conduct safety, security, crime prevention, and homeland security training for Metro employees.	LASD	Partially	When asked by Metro management, training is provided but no regular series of initiatives or program exists.
12	Attend Metro "ops and cops," "ROLE," "USG Security Task Force," and other security meetings as scheduled to interact with bus and train operators and Metro staff on TCPS matters.	LASD	Yes	Key TSB personnel are assigned to attend and participate in these meetings.
13	Develop mandatory training for all Metro/LASD personnel that will include bus safety, bus operations, conflict resolution, self-defense, specialized bus tactics, and Transit Community Policing.	LASD	Partially	Some Deputies do not receive this training.



<b>Exhibit 33</b> <b>Both Bus and Rail Operations Requirements</b>				
	<b>Requirement</b>	<b>Responsibility</b>	<b>Requirement Met?</b>	<b>Comments / Documentation</b>
1	Notify Metro of any security issues, major incidents, etc.	LASD	Yes	This occurs through Communications Center and normal reporting chain of command.
2	Meet with Metro on a weekly basis for discussion of issues.	LASD	Yes	Meetings occur regularly with the DEO; other managers have regular contacts with various METRO managers and supervisors.
3	Develop attainable service level goals.	LASD and Metro	Partially	Adequate effort in this area has not been established and is needed.
4	Perform law, fare, and code of conduct enforcement.	LASD	Partially	Due to the lack of a strategic plan for bus and rail policing, such enforcement occurs sporadically and not in coordination with central command oversight.
5	Provide high visibility and customer friendly service.	LASD	Partially	No central, strategic plan exists that direct service-oriented policing, but individual components of service-oriented policing are reinforced through some directives and standard practices.
6	Issue citations.	LASD	Yes	Deputies will issue citations as offenses are noticed.
7	Carry and use fare inspection device.	LASD	Partially	Some Deputies do not have



Exhibit 33				
Both Bus and Rail Operations Requirements				
	Requirement	Responsibility	Requirement Met?	Comments / Documentation
				equipment.
8	Establish plainclothes and special teams.	LASD	Yes	TSB has a number of special teams operating in plainclothes that are commensurate to the problems being observed.
9	Assign detectives if there is a requirement for transit specific expertise (Most investigations to be conducted by local police).	LASD	Yes	Investigative resources assigned to the Transit Services Bureau are robust and heavily involved in numerous investigations related to crime occurring on the Metro transit system.
10	Develop anti-graffiti function through directed patrol and surveillance.	LASD	Yes	Quality of life crimes, including graffiti, are addressed by existing orders.
11	Develop anti-terrorism function.	LASD	Yes	Under guidelines from the LASD, counter-terrorism elements are in place and constantly updated.
12	Develop transit crime analysis function.	LASD	Yes	Crime analysis personnel conduct regular analysis of crime and disorder incidents; analysis results are used in some personnel assignments.
13	Work with Inspector General investigators as needed.	LASD	Yes	When requested, Transit Security Personnel assist Inspector General staff with investigations related to transit operations.



<b>Exhibit 33</b> <b>Both Bus and Rail Operations Requirements</b>				
	<b>Requirement</b>	<b>Responsibility</b>	<b>Requirement Met?</b>	<b>Comments / Documentation</b>
14	Provide safety and security training to Metro staff and the public.	LASD	Partially	Some training is provided but there is no formal program to provide for widespread training.
15	Assignment of sworn personnel to the Metro Emergency Operations Center.	LASD	Yes	Sworn personnel are assigned to the Emergency Operations Center when activated.
16	Review security and provide comment for Metro construction or other operational projects.	LASD	Yes	When requested by Metro TSB staff provide.
17	Advise on TCPP and security to Metro management.	LASD	Yes	This assistance is provided when requested, but most such security is provided by Metro Security personnel.
18	Provide services during any union work stoppage.	LASD	Yes	Special assignments for TSB personnel.
19	Ensure that LASD's services are not used for general law enforcement purposes.	LASD	Yes	TSB is careful to separate personnel assignments from billed services when those services are provided for non-contract situations.
20	Provide security and risk assessments in support of Metro's overall security needs.	LASD	Yes	TSB undertakes these assessments when requested by Metro staff.
21	Respond to/investigate Metro bus and train related traffic incidents.	LASD	Yes	TSB conducts rapid and complete investigations when needed; other agencies also requested to investigate if no TSB personnel are



<b>Exhibit 33</b>				
<b>Both Bus and Rail Operations Requirements</b>				
	<b>Requirement</b>	<b>Responsibility</b>	<b>Requirement Met?</b>	<b>Comments / Documentation</b>
				available in a timely manner.
22	Respond to/investigate Metro bus and train related bomb threats, terrorist threats, and other incidents.	LASD	Yes	TSB provides rapid response to such situations by specially trained TSB personnel; also have services of LASD personnel when needed.
23	Advise the DEO on current issues regarding terrorism, including countermeasures, training, or other preparations.	LASD	Yes	TSB maintains regular contact with DEO on information, and threats received, describing special actions, if any, being taken.
24	Provide periodic intelligence briefings to the DEO, Metro Director of Security, or other designated Metro executives.	LASD	Yes	Regular meetings occur between TSB Commander and DEO to review intelligence and other related matters.





**Exhibit 34**  
**Specific Bus Operations Requirements**

	Requirement	Responsibility	Requirement Met?	Comments / Documentation
1	Develop bus specific Transit Community Policing Plan and Strategy.	LASD	No	While individual components are in effect that would be part of these, no central plan or strategy exists as such.
2	Provide service in all designated Transit Community Policing Areas.	LASD	Yes	The "Community Policing Areas" is, in fact, the total jurisdiction. Service is provided to the entire Metro service area.
3	Have full capacity, ability, and clear authority to provide services for entire area.	LASD	Yes	This authority is only limited by the lack of personnel because LASD does not fill vacancies as they occur, resulting in a shortage of personnel.
4	Base services on Metro Bus Operating Divisions.	LASD	Partially	While services are based on existing operating divisions, patrol boundaries require further modification to provide more efficient service to bus services.
5	Assign lead Deputies to operating divisions and division managers.	LASD	No	Organizational structure at present time does not provide for these types of assignments.
6	Bus Transit Community Policing staff may be geographically assigned.	LASD	No	There is no Community Policing staff in the real sense of the community policing concept. Absent a Policing Strategy, there is no focus in this area.



Exhibit 34 Specific Bus Operations Requirements				
	Requirement	Responsibility	Requirement Met?	Comments / Documentation
7	Use directed uniformed patrol operations.	LASD	Yes	Uniformed directed patrol operations used.
8	Promptly respond to all reports of criminal activity and calls for service from any Metro staff or customers.	LASD	Yes	Assignments emanate from the Communications Unit or through management chain of command when Metro expresses concerns.
9	Notify local law enforcement when unable to respond to calls for service.	LASD	Yes	Existing plans dictate that local law enforcement will be notified for bus-related calls for service when appropriate.
10	Suppress crime through high visibility directed uniformed patrols at problem locations affecting public transit.	LASD	Partially	Some of these assignments occur on a regular basis but not to the degree that is required for effective problem-solving. Supporting analysis for such assignments is limited and not easily available.
11	Board and ride buses within dedicated patrol areas to provide high visibility crime prevention.	LASD	Yes	At present, these patrol areas are divided between North and South and Deputies frequently respond to both rail and bus incidents. However, this report recommends that rail Deputies should be dedicated to rail duties and bus Deputies to bus duties.
12	Apply community policing principles to address	LASD	Partially	While some community policing



**Exhibit 34**  
**Specific Bus Operations Requirements**

	Requirement	Responsibility	Requirement Met?	Comments / Documentation
	transit crime problems, including identifying crime and disorder problems and patterns, then develop and implement effective plans and strategies to solve the problems.			principles are in effect, there is no central, strategic plan to bring community policing services to bus operations.
13	Engage other government agencies as needed.	LASD	Partially	Commander and Captains do engage with other government agencies but outreach could be greatly expanded, particularly regarding problem-solving on issues such as homelessness and station disorder.
14	Enforce parking and traffic laws to ensure uninterrupted services, including aggressive traffic enforcement at "at grade" portions of the rail system with motorized officers/Deputies.	LASD	Partially	Some LASD personnel do enforce these laws when observed or when so detailed but the action is not particularly robust or part of the policing strategy since that strategy does not exist.
15	Provide for protection of Metro and LASD personnel assigned to transit field duties in higher-crime areas.	LASD	Yes	Protection is provided when requested, given the limited staffing available to the Transit Services Bureau.
16	Provide for fully trained and capable canine teams as specified in the staffing plan (bus only).	LASD	Yes	Teams are available, well trained, and are rapidly available for assignment. Cover all shifts.
17	Support and augment bus operations with other LASD County-wide law enforcement services.	LASD	Partially	Service can be obtained from other LASD units as needed, when



<b>Exhibit 34</b>				
<b>Specific Bus Operations Requirements</b>				
	<b>Requirement</b>	<b>Responsibility</b>	<b>Requirement Met?</b>	<b>Comments / Documentation</b>
				notified by Communications. There is some reluctance to use other agency personnel for many response types.

<b>Exhibit 35</b>				
<b>Specific Rail Operations Requirements</b>				
	<b>Requirement</b>	<b>Responsibility</b>	<b>Requirement Met?</b>	<b>Comments / Documentation</b>
1	Provide service in all designated Transit Community Policing Areas.	LASD	Partially	LASD TSB does not have a community policing plan for the rail system. Current practice of assigning Deputies by line needs to change. Deputies need to be assigned by geographical area.
2	Promptly respond to all reports of criminal activity and calls for service from any Metro staff or customers.	LASD	Yes	LASD TSB units respond to all calls for service from Metro staff as well as the public; however, TSB needs to monitor and review response time. Response time should be analyzed and discussed at monthly ILP Meetings.
3	Notify local law enforcement when unable to respond to calls for service.	LASD	Yes	ROC will dispatch units to calls for service. In the event the unit is unable to respond in a timely manner or unable to respond the



Exhibit 35 Specific Rail Operations Requirements				
	Requirement	Responsibility	Requirement Met?	Comments / Documentation
				local police agency will be notified and requested to respond.
4	Suppress crime through high visibility directed uniformed patrols at problem locations affecting public transit.	LASD	Partially	Efforts have been undertaken by TSB to increase visibility on rail lines. Deputies assigned to foot patrol are no longer assigned vehicles. Deputies are now being assigned to "directed patrol" including train patrol. TSB can increase its visibility on trains by having Deputies assigned to trains patrol independently of each other while in close proximity.
5	Board and ride buses and trains within dedicated patrol areas to provide high visibility crime prevention.	LASD	Yes	See #4
6	Apply community policing principles to address transit crime problems, including identifying crime and disorder problems and patterns, then developing and implementing effective plans and strategies to solve the problems.	LASD	Partially	LASD TSB conducts monthly ILP meeting where crime patterns are identified and discussed. The rail system is likely to be impacted by quality of life issues such as graffiti, homeless, and unlicensed vendors. More emphasis needs to be placed on addressing these issues.
7	Engage other government agencies as needed.	LASD	Yes	LASD TSB is working with other



Exhibit 35 Specific Rail Operations Requirements				
	Requirement	Responsibility	Requirement Met?	Comments / Documentation
				agencies to identify common concerns and problems that affect not only the rail service but in the jurisdiction they are located. This needs to be expanded.
8	Enforce parking and traffic laws to ensure uninterrupted services, including aggressive traffic enforcement at "at grade" portions of the rail system with motorized officers/Deputies.	LASD	Partially	LASD TSB currently assigns motorized units (motorcycles) to high rail accident locations for purposes of issuing citations to motorist who disobey signals at "grade crossings". Rail parking lots are patrolled as well to deter vandalism. However, these patrols are only conducted when resources are available.
9	Provide for protection of Metro and LASD personnel assigned to transit field duties in higher-crime areas.	LASD	Yes	LASD TSB assigns Deputies to police high crime areas on rail lines. In addition a motor patrol is also assigned to the line to respond to calls and provide backup when necessary. Metro employees are trained on how to report incidents.
10	Support and augment rail operations with other LASD County-wide law enforcement services.	LASD	Yes	The LASD has provided, when needed the services of other LASD county-wide units including



Exhibit 35				
Specific Rail Operations Requirements				
	Requirement	Responsibility	Requirement Met?	Comments / Documentation
				specialized units such as Bomb Squad, canine, and SWAT teams.



<b>Exhibit 36</b>				
<b>Dispatch Operations and Communications Requirements</b>				
	<b>Requirement</b>	<b>Responsibility</b>	<b>Requirement Met?</b>	<b>Comments / Documentation</b>
1	Set up central dispatch center in ROCC or BOC.	LASD	Partially	There is Central dispatch at the BOCC with LASD personnel located in the Command Center; however, at the ROCC LASD personnel are located on another floor.
2	Provide police radio dispatch and communications ability that is fully integrated into LASD's basic communications system and designed to minimize response times.	LASD	No	The radio/communications ability are not fully integrated with LASD Communications system. There is no formal TSB Communications Manual. There is no call tracking system in place.
3	Ensure that above ability has "rapid, direct, and dedicated communications channels" (incl. "ring down line") to ROCC and BOC.	LASD	Partially	LASD has the ability to communicate with ROC and BOC; however, the current system is not designed to minimize call handling and response times.





**Exhibit 37**

**Other Requirements**

	Requirement	Responsibility	Requirement Met?	Comments / Documentation
1	Work with Metro to reduce costs, including by participating in grant applications when asked.	LASD	Partially	Cost reduction is not a top priority for the TSB, but they do willingly participate in grant applications when requested.
2	Issue Metro code books to all Deputies and ensure that they are the basis for all citations.	LASD	Partially	Some Deputies have these materials, others do not. The same is true of specialized equipment, such as Tap Checkers.
3	Develop and implement a crime reporting and analysis program.	LASD	Yes	LASD crime analysis personnel prepare a monthly report addressing crime on Bus/Rail Lines. The analysis aspect needs to be enhanced.
4	Provide reporting to the Metro DEO or other agencies upon request.	LASD	Yes	Monthly reports are provided to Metro.
5	Provide productivity data, reports, and other analyses to Metro.	LASD	Partially	While some data reports are provided, Metro managers have repeatedly requested data on LASD personnel deployments and have indicated that the information has not been forthcoming.
6	Provide service to certain municipal bus operators.	LASD	Yes	When so requested by Metro.
7	Develop a reserve officer/Deputy program or	LASD	Yes	TSB has a reserve program and



Exhibit 37				
Other Requirements				
	Requirement	Responsibility	Requirement Met?	Comments / Documentation
	engage other services at LASD's discretion.			uses reserve Deputies.
8	Establish MOUs with abutting jurisdictions; implement protocols and procedures accordingly.	LASD	Partially	MOUs need to be greatly expanded so other law enforcement agencies respond to emergency situations when TSB personnel are not available. This is done informally now.



## **Appendix B: Billing Analysis Detailed Exhibits**

The following are exhibits developed as part of the Billing Analysis and Detailed Testing.



### Exhibit 38

#### Summary of Base Contract, Modifications, Contract Value, Board Approved Amounts and Payments by Fiscal Years

	Base Contract	Mod. 1	Subtotal	Mod. 2	Mod. 3	Mod. 4	Mod. 5	Mod. 6	Subtotal	Mod. 7	Mod. 8	Subtotal
Contract date:	6/30/09	12/10/09		7/22/10	6/22/11	8/4/11	9/22/11	11/1/11		8/1/12	8/1/12	
Covered Period:	7/1/09-6/30/10	7/1/09-6/30/10	7/1/09-6/30/10	7/1/10-6/30/11	7/1/11-7/31/11	8/1/1-9/30/11	10/1/11-10/31/11	7/1/2011-6/30/2012	7/1/2011-6/30/12	7/1/2012-6/30/13	7/1/12-6/30/13	7/1/12-6/30/13
Contract Amount:	\$65,921,937		\$65,921,937	\$62,937,004					\$-		\$78,681,665	\$78,681,665
Increased service amount:	-	2,895,460	2,895,460		5,470,211	10,940,422	5,470,211	58,844,951	80,725,795		1,643,961	1,643,961
		943,216	943,216			227,461			227,461			
Amended contract amount:	\$65,921,937	\$3,838,676	\$69,760,613	\$62,937,004	\$5,470,211	\$11,167,883	\$5,470,211	\$58,844,951	\$80,953,256	\$-	\$80,325,626	\$80,325,626

	Base Contract	Mod. 1	Subtotal	Mod. 2	Mod. 3	Mod. 4	Mod. 5	Mod. 6	Subtotal	Mod. 7	Mod. 8	Subtotal
Board document No.	No. 34	No. 34	Subtotal	No. 6		No. 52	No. 49/no. 66	No. 52	Subtotal	No. 46	No. 57	
Date:	5/21/09	11/19/09	7/1/09-6/30/10	7/12/10	4/14/11	7/21/11	9/15/11	10/20/11	7/1/2011-6/30/12	5/17/12	10/18/12	7/1/12-6/30/13
Board Approved Amount:												
- contract based amount	65,921,937		65,921,937	62,937,004				58,844,951	58,844,951	80,622,796	80,622,796	80,622,796
- additional amount		2,895,460	2,895,460		5,470,211	10,940,422	5,470,211		21,880,844			
		943,216	943,216			227,461			227,461			
									(227,461)			
	65,921,937	3,838,676	69,760,613	62,937,004	5,470,211	11,167,883	5,470,211	58,844,951	80,725,795	80,622,796	80,622,796	80,622,796

	FY 2010			FY 2011	FY 2012				FY 2013		
Payments paid by Metro:			\$67,707,213	\$62,996,372				\$74,726,858		\$79,992,581	
Board approved amount over (less) payment amount:			\$2,053,400	\$(59,368)				\$5,998,937		\$630,215	



<b>Exhibit 39</b>			
<b>Summary of FTE Sworn Personnel Sample Testing for FY 2013</b>			
	<b>Captain</b>	<b>Lieutenant</b>	<b>Sergeant</b>
<b>July 2012 Total sampled hours:</b>	192	1,526	2,200
<b>Unsupported:</b>			
Time Card - not provided	0	32	0
<b>Questioned:</b>			
Time cards showed less hours than in the Actual Hours Worked Report (Weekly).	0	14	0
<b>Total unsupported / questioned:</b>	0	46	0
<b>December 2012 Total sampled hours:</b>	176	1,073	2,050
<b>Unsupported:</b>			
Time Card - not provided	0	8	2
<b>Questioned:</b>			
Time cards showed less hours than in the Actual Hours Worked Report (Weekly).	0	0	16
<b>Total unsupported / questioned:</b>	0	8	18
<b>May 2013 Total sampled hours:</b>	264	1,714	1,963
<b>Unsupported:</b>			
Time Card - not provided	0	104	8
<b>Questioned:</b>			
Time cards showed less hours than in the Actual Hours Worked Report (Weekly).	0		18
<b>Total unsupported / questioned:</b>	0	104	26
<b>June 2013 Total sampled hours:</b>	160	1,608	2,177
<b>Unsupported:</b>			
Time Card - not provided	0	8	8
<b>Questioned:</b>			
Time cards showed less hours than in the Actual Hours Worked Report (Weekly).	0	0	24
<b>Total unsupported / questioned:</b>	0	8	32



Exhibit 40				
Summary of Service Minutes Testing for FY 2013				
	Sworn Personnel		Civilian Personnel	
	Minutes	% of sampled Minutes	Minutes	% of sampled Minutes
<b>July 2012 Total sampled minutes:</b>	354,606	100%	103,800	100%
<b>Unsupported:</b>				
Both Time Card & DDW not provided	1,920	0.54%		
Only Time card - not provided	64,710	18.25%	1,440	1.39%
Only DDW - not provided	9,941	2.80%	1,440	1.39%
<b>Subtotal:</b>	76,571		2,880	
<b>Questioned:</b>				
Discrepancies of minutes reported compared to time card or DDW or no activities shown in DDW.	3,840	1.08%	-	
Administrative work charged.	4,410	1.24%	-	
<b>Subtotal:</b>	8,250		-	
<b>Total unsupported / Questioned minutes:</b>	84,821	23.92%	2,880	2.77%
<b>December 2012 Total sampled minutes:</b>	337,817	100%	99,000	100%
<b>Unsupported:</b>				
Both Time Card & DDW not provided	23,151	6.85%	7,200	7.27%
Only Time card - not provided	32,413	9.59%	8,640	8.73%
Only DDW - not provided	97,636	28.90%	30,240	30.55%
<b>Subtotal:</b>	153,200	45.35%	46,080	46.55%
<b>Questioned:</b>				
Discrepancies of minutes reported compared to time card or DDW or no activities shown in DDW.	2,040	0.60%	960	0.97%
Administrative work charged.	600	0.18%	480	0.48%
<b>Subtotal:</b>	2,640		1,440	1.45%
<b>Total unsupported / Questioned minutes:</b>	155,840	46.13%	47,520	48.00%
<b>May 2013 Total sampled minutes:</b>	318,887	100%	87,840	100%
<b>Unsupported:</b>				



Exhibit 40				
Summary of Service Minutes Testing for FY 2013				
	Sworn Personnel		Civilian Personnel	
	Minutes	% of sampled Minutes	Minutes	% of sampled Minutes
Both Time Card & DDW not provided	17,474	5.48%	960	1.09%
Only Time card - not provided	37,680	11.82%	1,440	1.64%
Only DDW - not provided	97,455	30.56%	32,160	36.61%
<b>Subtotal:</b>	152,609	47.86%	34,560	39.34%
<b>Questioned:</b>				
Discrepancies of minutes reported compared to time card or DDW or no activities shown in DDW.	2,520	0.79%	480	0.55%
Administrative work charged.		0.00%		0.00%
<b>Subtotal:</b>	2,520		480	0.55%
<b>Total unsupported / Questioned minutes:</b>	155,129	48.65%	35,040	39.89%
<b>June 2013 Total sampled minutes:</b>	335,813	100%	96,693	100%
<b>Unsupported:</b>				
Both Time Card & DDW not provided	13,080	3.90%	2,400	2.48%
Only Time card - not provided	24,777	7.38%	2,880	2.98%
Only DDW - not provided	102,316	30.47%	32,220	33.32%
<b>Subtotal:</b>	140,173		37,500	38.78%
<b>Questioned:</b>				
Discrepancies of minutes reported compared to time card or DDW	960	0.29%		0.00%
Admin work charged.		0.00%		0.00%
<b>Subtotal:</b>	960		-	0.00%
<b>Total unsupported / Questioned minutes:</b>	141,133	42.03%	37,500	38.78%



<b>Exhibit 41</b>											
<b>Summary of FY2010 Service Minutes Compliance Analysis</b>											
<b>Sworn Personnel</b>								<b>Civilian Personnel</b>			
<b>Period:</b>	Lieutenant	Sergeant	Bonus Deputy	Motors	Patrol (DSG)	Special Assignment Officer (SAO) Deputy	<b>Total</b>	Security Officer	Non-Sworn Support (LET, CSA, CA PCO)	Clerical	<b>Total</b>
<b>Per 575 Approved Budget FY 2009-10</b>			2,039,460.00	2,361,480.00	27,658,518.00	214,680.00	32,274,138.00	7,621,140.00			7,621,140.00
<b>Per LASD's RAPS 500A Monthly Report</b>											
<b>July 2009</b>											
Minutes Scheduled			173,214.00	200,564.00	2,339,840.00	18,233.00	2,731,851.00	647,275.00			647,275.00
Minutes Provided			97,102.00	199,651.00	2,340,017.00	17,010.00	2,653,780.00	630,552.00	477.00		631,029.00
Variance:			(76,112.00)	(913.00)	177.00	(1,223.00)	(78,071.00)	(16,723.00)	477.00		(16,246.00)
% Compliance			56.06%	99.54%	100.01%	93.29%	97.14%	97.42%			97.49%
<b>August 2009</b>											
Minutes Scheduled			173,214.00	200,564.00	2,339,840.00	18,233.00	2,731,851.00	647,275.00			647,275.00
Minutes Provided		480.00	96,638.00	168,830.00	2,275,526.00	19,318.00	2,560,792.00	583,814.00			583,814.00
Variance:			(76,576.00)	(31,734.00)	(64,314.00)	1,085.00	(171,059.00)	(63,461.00)			(63,461.00)
% Compliance			55.79%	84.18%	97.25%	105.95%	93.74%	90.20%			90.20%
<b>September 2009</b>											
Minutes Scheduled			167,627.00	194,094.00	2,264,362.00	17,645.00	2,643,728.00	626,395.00			626,395.00
Minutes Provided		153.00	99,239.00	198,024.00	2,270,538.00	24,960.00	2,592,914.00	616,872.00	480.00		617,352.00
Variance:		153.00	(68,388.00)	3,930.00	6,176.00	7,315.00	(50,814.00)	(9,523.00)	480.00		(9,043.00)
% Compliance			59.20%	102.02%	100.27%	141.46%	98.08%	98.48%			98.56%
<b>October 2009</b>											
Minutes Scheduled			173,214.00	200,564.00	2,448,028.00	18,233.00	2,840,039.00	647,275.00			647,275.00
Minutes Provided		818.00	107,540.00	196,310.00	2,399,479.00	21,810.00	2,725,957.00	635,058.00		480	635,538.00
Variance:			(65,674.00)	(4,254.00)	(48,549.00)	3,577.00	(114,082.00)	(12,217.00)		480	(11,737.00)
% Compliance			62.09%	97.88%	98.02%	119.62%	95.98%	98.11%			98.19%
<b>November 2009</b>											
Minutes Scheduled			167,627.00	194,094.00	2,369,059.00	17,645.00	2,748,425.00	626,395.00			626,395.00





### Exhibit 41

### Summary of FY2010 Service Minutes Compliance Analysis

Sworn Personnel								Civilian Personnel			
						Special Assignment Officer (SAO) Deputy			Non-Sworn Support (LET, CSA, CA PCO)		
Period:	Lieutenant	Sergeant	Bonus Deputy	Motors	Patrol (DSG)		Total	Security Officer		Clerical	Total
Minutes Provided		108.00	107,390.00	197,311.00	2,357,531.00	21,336.00	2,683,676.00	609,360.00			609,360.00
Variance:			(60,237.00)	3,217.00	(11,528.00)	3,691.00	(64,749.00)	(17,035.00)			(17,035.00)
% Compliance			64.06%	101.66%	99.51%	120.92%	97.64%	97.28%			97.28%
December 2009											
Minutes Scheduled			173,214.00	200,564.00	2,448,028.00	18,233.00	2,840,039.00	647,275.00			647,275.00
Minutes Provided		889.00	132,893.00	195,799.00	2,475,263.00	15,600.00	2,820,444.00	595,632.00			595,632.00
Variance:			(40,321.00)	(4,765.00)	27,235.00	(2,633.00)	(19,595.00)	(51,643.00)			(51,643.00)
% Compliance			76.72%	97.62%	101.11%	85.56%	99.31%	92.02%			92.02%
January 2010											
Minutes Scheduled			173,214.00	200,564.00	2,448,028.00	18,233.00	2,840,039.00	683,741.00			683,741.00
Minutes Provided		960.00	131,712.00	182,410.00	2,481,640.00	20,637.00	2,817,359.00	643,740.00			643,740.00
Variance:		960.00	(41,502.00)	(18,154.00)	33,612.00	2,404.00	(22,680.00)	(40,001.00)			(40,001.00)
% Compliance			76.04%	90.95%	101.37%	113.18%	99.20%	94.15%			94.15%
February 2010											
Minutes Scheduled			156,452.00	181,155.00	2,211,122.00	16,469.00	2,565,198.00	617,573.00			617,573.00
Minutes Provided			143,766.00	176,267.00	2,321,609.00	17,550.00	2,659,192.00	576,691.00		480	577,171.00
Variance:			(12,686.00)	(4,888.00)	110,487.00	1,081.00	93,994.00	(40,882.00)		480	(40,402.00)
% Compliance			91.89%	97.30%	105.00%	106.56%	103.66%	93.38%			93.46%
March 2010											
Minutes Scheduled			173,214.00	200,564.00	2,448,028.00	18,233.00	2,840,039.00	683,741.00			683,741.00
Minutes Provided			176,459.00	204,491.00	2,533,423.00	22,407.00	2,936,780.00	682,926.00	960.00		683,886.00
Variance:			3,245.00	3,927.00	85,395.00	4,174.00	96,741.00	(815.00)	960.00		145.00
% Compliance			101.87%	101.96%	103.49%	122.89%	103.41%	99.88%			100.02%
April 2010											
Minutes Scheduled			167,627.00	194,094.00	2,369,059.00	17,645.00	2,748,425.00	661,685.00			661,685.00
Minutes Provided			183,591.00	187,259.00	2,448,012.00	16,830.00	2,835,692.00	643,079.00			643,079.00
Variance:			15,964.00	(6,835.00)	78,953.00	(815.00)	87,267.00	(18,606.00)			(18,606.00)
% Compliance			109.52%	96.48%	103.33%	95.38%	103.18%	97.19%			97.19%



## Exhibit 41

### Summary of FY2010 Service Minutes Compliance Analysis

Sworn Personnel								Civilian Personnel			
Period:	Lieutenant	Sergeant	Bonus Deputy	Motors	Patrol (DSG)	Special Assignment Officer (SAO) Deputy	Total	Security Officer	Non-Sworn Support (LET, CSA, CA PCO)	Clerical	Total
May 2010											
Minutes Scheduled			173,214.00	200,564.00	2,448,028.00	18,233.00	2,840,039.00	683,741.00			683,741.00
Minutes Provided		926.00	154,748.00	183,457.00	2,579,604.00	19,080.00	2,937,815.00	677,312.00	960.00		678,272.00
Variance:			(18,466.00)	(17,107.00)	131,576.00	847.00	97,776.00	(6,429.00)	960.00		(5,469.00)
% Compliance			89.34%	91.47%	105.37%	104.65%	103.44%	99.06%			99.20%
June 2010											
Minutes Scheduled			167,627.00	194,094.00	2,369,059.00	17,645.00	2,748,425.00	661,685.00			661,685.00
Minutes Provided			177,542.00	171,755.00	2,618,918.00	15,180.00	2,983,395.00	693,601.00			693,601.00
Variance:			9,915.00	(22,339.00)	249,859.00	(2,465.00)	234,970.00	31,916.00			31,916.00
% Compliance			105.91%	88.49%	110.55%	86.03%	108.55%	104.82%			104.82%
Year to Date											
Minutes Scheduled			2,039,458.00	2,361,479.00	28,502,481.00	214,680.00	33,118,098.00	7,834,056.00		-	7,834,056.00
Minutes Provided		4,334.00	1,608,620.00	2,261,564.00	29,101,560.00	231,718.00	33,207,796.00	7,588,637.00	2,877.00	960.00	7,592,474.00
Variance:		4,334.00	(430,838.00)	(99,915.00)	599,079.00	17,038.00	89,698.00	(245,419.00)	2,877.00	960	(241,582.00)
% Compliance			78.87%	95.77%	102.10%	107.94%	100.27%	96.87%			96.92%



## Exhibit 42

### Summary of FY2011 Service Minutes Compliance Analysis

	Sworn Personnel							Civilian Personnel			
Period:	Lieutenant	Sergeant	Bonus Deputy	Motors	Patrol (DSG)	Special Assignment Officer (SAO) Deputy	Total	Security Officer	Non-Sworn Support (LET, CSA, CA PCO)	Clerical	Total
<b>Per 575 Approved Budget FY 2010-11</b>			1,932,120.00	2,361,480.00	25,614,935.00	214,680.00	30,123,215.00	7,621,140.00			7,621,140.00
<b>Per RAPS 500A Monthly Report</b>											
<b>July 2010</b>											
Minutes Scheduled			164,098.00	200,564.00	2,175,515.00	18,233.00	2,558,410.00	647,275.00			647,275.00
Minutes Provided			167,517.00	169,546.00	2,115,345.00	19,920.00	2,472,328.00	668,707.00			668,707.00
Variance:			3,419.00	(31,018.00)	(60,170.00)	1,687.00	(86,082.00)	21,432.00			21,432.00
% Compliance			102.08%	84.53%	97.23%	109.25%	96.64%	103.31%			103.31%
<b>August 2010</b>											
Minutes Scheduled			164,098.00	200,564.00	2,175,515.00	18,233.00	2,558,410.00	647,275.00			647,275.00
Minutes Provided			158,197.00	172,547.00	1,941,054.00	20,580.00	2,292,378.00	649,375.00			649,375.00
Variance:			(5,901.00)	(28,017.00)	(234,461.00)	2,347.00	(266,032.00)	2,100.00			2,100.00
% Compliance			96.40%	86.03%	89.22%	112.87%	89.60%	100.32%			100.32%
<b>September 2010</b>											
Minutes Scheduled			158,804.00	194,094.00	2,105,337.00	17,645.00	2,475,880.00	626,395.00			626,395.00
Minutes Provided			215,118.00	192,457.00	2,053,496.00	20,700.00	2,481,771.00	656,758.00			656,758.00
Variance:			56,314.00	(1,637.00)	(51,841.00)	3,055.00	5,891.00	30,363.00			30,363.00
% Compliance			135.46%	99.16%	97.54%	117.31%	100.24%	104.85%			104.85%
<b>October 2010</b>											
Minutes Scheduled			164,098.00	200,564.00	2,175,515.00	18,233.00	2,558,410.00	647,275.00			647,275.00
Minutes Provided	480.00		191,162.00	192,510.00	2,141,828.00	15,360.00	2,540,860.00	614,700.00			614,700.00



## Exhibit 42

### Summary of FY2011 Service Minutes Compliance Analysis

	Sworn Personnel							Civilian Personnel			
Period:	Lieutenant	Sergeant	Bonus Deputy	Motors	Patrol (DSG)	Special Assignment Officer (SAO) Deputy	Total	Security Officer	Non-Sworn Support (LET, CSA, CA PCO)	Clerical	Total
Variance:			27,064.00	(8,054.00)	(33,687.00)	(2,873.00)	(17,550.00)	(32,575.00)			(32,575.00)
% Compliance			116.49%	95.98%	98.45%	84.24%	99.31%	94.97%			94.97%
<b>November 2010</b>											
Minutes Scheduled			158,804.00	194,094.00	2,105,337.00	17,645.00	2,475,880.00	626,395.00			626,395.00
Minutes Provided			190,805.00	202,950.00	2,092,995.00	18,540.00	2,505,290.00	608,370.00			608,370.00
Variance:			32,001.00	8,856.00	(12,342.00)	895.00	29,410.00	(18,025.00)			(18,025.00)
% Compliance			120.15%	104.56%	99.41%	105.07%	101.19%	97.12%			97.12%
<b>December 2010</b>											
Minutes Scheduled			164,098.00	200,564.00	2,175,515.00	18,233.00	2,558,410.00	647,275.00			647,275.00
Minutes Provided		480.00	193,469.00	210,565.00	2,176,679.00	18,570.00	2,599,763.00	608,099.00			608,099.00
Variance:			29,371.00	10,001.00	1,164.00	337.00	41,353.00	(39,176.00)			(39,176.00)
% Compliance			117.90%	104.99%	100.05%	101.85%	101.62%	93.95%			93.95%
<b>January 2011</b>											
Minutes Scheduled			164,098.00	200,564.00	2,175,515.00	18,233.00	2,558,410.00	647,275.00			647,275.00
Minutes Provided		480.00	167,097.00	201,744.00	2,167,866.00	19,710.00	2,556,897.00	586,754.00			586,754.00
Variance:			2,999.00	1,180.00	(7,649.00)	1,477.00	(1,513.00)	(60,521.00)			(60,521.00)
% Compliance			101.83%	100.59%	99.65%	108.10%	99.94%	90.65%			90.65%
<b>February 2011</b>											
Minutes Scheduled			148,217.00	181,155.00	1,964,981.00	16,469.00	2,310,822.00	584,635.00			584,635.00
Minutes Provided		600.00	176,865.00	189,660.00	1,993,922.00	16,410.00	2,377,457.00	548,678.00	600.00		549,278.00
Variance:			28,648.00	8,505.00	28,941.00	(59.00)	66,635.00	(35,957.00)			(35,957.00)



## Exhibit 42

### Summary of FY2011 Service Minutes Compliance Analysis

	Sworn Personnel							Civilian Personnel			
						Special Assignment Officer (SAO) Deputy			Non- Sworn Support (LET, CSA, CA PCO)		
Period:	Lieutenant	Sergeant	Bonus Deputy	Motors	Patrol (DSG)		Total	Security Officer		Clerical	Total
% Compliance			119.33%	104.69%	101.47%	99.64%	102.88%	93.85%			93.95%
March 2011											
Minutes Scheduled			164,098.00	200,564.00	2,175,515.00	18,233.00	2,558,410.00	647,275.00			647,275.00
Minutes Provided	60.00	1,440.00	178,185.00	210,637.00	2,221,597.00	21,330.00	2,633,249.00	607,852.00			607,852.00
Variance:			14,087.00	10,073.00	46,082.00	3,097.00	74,839.00	(39,423.00)			(39,423.00)
% Compliance			108.58%	105.02%	102.12%	116.99%	102.93%	93.91%			93.91%
April 2011											
Minutes Scheduled			158,804.00	194,094.00	2,105,337.00	17,645.00	2,475,880.00	626,395.00			626,395.00
Minutes Provided		960.00	175,614.00	177,554.00	2,135,548.00	20,742.00	2,510,418.00	578,292.00			578,292.00
Variance:			16,810.00	(16,540.00)	30,211.00	3,097.00	34,538.00	(48,103.00)			(48,103.00)
% Compliance			110.59%	91.48%	101.43%	117.55%	101.39%	92.32%			92.32%
May 2011											
Minutes Scheduled			173,214.00	200,564.00	2,175,515.00	18,233.00	2,567,526.00	647,275.00			647,275.00
Minutes Provided		1,440.00	180,618.00	210,357.00	2,154,450.00	25,127.00	2,571,992.00	583,892.00			583,892.00
Variance:			7,404.00	9,793.00	(21,065.00)	6,894.00	4,466.00	(63,383.00)			(63,383.00)
% Compliance			104.27%	104.88%	99.03%	137.81%	100.17%	90.21%			90.21%
June 2011											
Minutes Scheduled			167,627.00	194,094.00	2,105,337.00	17,645.00	2,484,703.00	626,395.00			626,395.00
Minutes Provided		1,480.00	162,671.00	195,572.00	2,104,022.00	22,380.00	2,486,125.00	580,286.00		960.00	581,246.00
Variance:			(4,956.00)	1,478.00	(1,315.00)	4,735.00	1,422.00	(46,109.00)			(45,149.00)
% Compliance			97.04%	100.76%	99.94%	126.83%	100.06%	92.64%			92.79%



## Exhibit 42

### Summary of FY2011 Service Minutes Compliance Analysis

	Sworn Personnel							Civilian Personnel			
						Special Assignment Officer (SAO) Deputy			Non- Sworn Support (LET, CSA, CA PCO)		
Period:	Lieutenant	Sergeant	Bonus Deputy	Motors	Patrol (DSG)		Total	Security Officer		Clerical	Total
Year to Date											
Minutes Scheduled	-	-	1,950,058.00	2,361,479.00	25,614,934.00	214,680.00	30,141,151.00	7,621,140.00		-	7,621,140.00
Minutes Provided	540.00	6,880.00	2,157,318.00	2,326,099.00	25,298,802.00	239,369.00	30,029,008.00	7,291,763.00	600.00	960.00	7,293,323.00
Variance:			207,260.00	(35,380.00)	(316,132.00)	24,689.00	(112,143.00)	(329,377.00)			(327,817.00)
% Compliance			110.63%	98.50%	98.77%	111.50%	99.63%	95.68%			95.70%



<b>Exhibit 43</b>											
<b>Summary of FY2012 Service Minutes Compliance Analysis</b>											
	<b>Sworn Personnel</b>							<b>Civilian Personnel</b>			
<b>Period:</b>	<b>Lieutenant</b>	<b>Sergeant</b>	<b>Bonus Deputy</b>	<b>Motors</b>	<b>Patrol (DSG)</b>	<b>Special Assignment Officer (SAO) Deputy</b>	<b>Total</b>	<b>Security Officer</b>	<b>Non-Sworn Support (LET, CSA, CA PCO)</b>	<b>Clerical</b>	<b>Total</b>
<b>Per 575 Approved Budget FY 2011-12</b>											
7/1/2011-9/30/2011			2,468,820.00	2,361,480.00	25,185,000.00	214,680.00	30,229,980.00	7,621,140.00			7,621,140.00
10/1/11			2,468,820.00	2,361,480.00	25,185,000.00	214,680.00	30,229,980.00	7,621,140.00			7,621,140.00
11/1/2011-6/30/2012			2,683,500.00	2,898,180.00	31,379,640.00	214,680.00	37,176,000.00	10,948,680.00			10,948,680.00
<b>Per RAPS 500A Monthly Report</b>											
<b>July 2011</b>											
Minutes Scheduled			172,741.00	200,016.00	2,169,571.00	18,183.00	2,560,511.00	645,506.00			645,506.00
Minutes Provided		1,144.00	158,078.00	196,676.00	2,003,423.00	21,240.00	2,380,561.00	580,074.00			580,074.00
Variance:			(14,663.00)	(3,340.00)	(166,148.00)	3,057.00	(179,950.00)	(65,432.00)			(65,432.00)
% Compliance			91.51%	98.33%	92.34%	116.81%	92.97%	89.86%			89.86%
<b>August 2011</b>											
Minutes Scheduled			172,741.00	200,016.00	2,169,571.00	18,183.00	2,560,511.00	645,506.00			645,506.00
Minutes Provided		2,400.00	214,504.00	180,795.00	2,180,480.00	23,760.00	2,601,939.00	626,507.00			626,507.00
Variance:			41,763.00	(19,221.00)	10,909.00	5,577.00	41,428.00	(18,999.00)			(18,999.00)
% Compliance			124.18%	90.39%	100.50%	130.67%	101.62%	97.06%			97.06%
<b>September 2011</b>											
Minutes Scheduled			167,169.00	193,564.00	2,099,585.00	17,597.00	2,477,915.00	624,684.00			624,684.00
Minutes Provided		480.00	195,101.00	197,639.00	2,152,180.00	20,760.00	2,566,160.00	568,270.00			568,270.00



### Exhibit 43

#### Summary of FY2012 Service Minutes Compliance Analysis

Period:	Sworn Personnel							Civilian Personnel			
	Lieutenant	Sergeant	Bonus Deputy	Motors	Patrol (DSG)	Special Assignment Officer (SAO) Deputy	Total	Security Officer	Non-Sworn Support (LET, CSA, CA PCO)	Clerical	Total
Variance:			27,932.00	4,075.00	52,595.00	3,163.00	88,245.00	(56,414.00)			(56,414.00)
% Compliance			116.71%	102.11%	102.51%	117.97%	103.56%	90.97%			90.97%
<b>October 2011</b>											
Minutes Scheduled			172,741.00	200,016.00	2,169,571.00	18,183.00	2,560,511.00	645,506.00			645,506.00
Minutes Provided	480.00	600.00	185,986.00	186,368.00	2,171,936.00	16,304.00	2,561,674.00	594,879.00			594,879.00
Variance:			13,245.00	(13,648.00)	2,365.00	(1,879.00)	1,163.00	(50,627.00)			(50,627.00)
% Compliance			107.67%	93.18%	100.11%	89.67%	100.05%	92.16%			92.16%
<b>November 2011</b>											
Minutes Scheduled			167,169.00	193,564.00	2,099,585.00	17,597.00	2,477,915.00	624,684.00			624,684.00
Minutes Provided			202,420.00	182,517.00	2,095,430.00	18,300.00	2,498,667.00	569,071.00			569,071.00
Variance:			35,251.00	(11,047.00)	(4,155.00)	703.00	20,752.00	(55,613.00)			(55,613.00)
% Compliance			121.09%	94.29%	99.80%	103.99%	100.84%	91.10%			91.10%
<b>December 2011</b>											
Minutes Scheduled			227,291.00	245,474.00	2,340,907.00	18,183.00	2,831,855.00	645,506.00			645,506.00
Minutes Provided		2,400.00	223,535.00	219,007.00	2,258,129.00	19,380.00	2,722,451.00	567,342.00	15.00		567,357.00
Variance:			(3,756.00)	(26,467.00)	(82,778.00)	1,197.00	(109,404.00)	(78,164.00)			(78,164.00)
% Compliance			98.35%	89.22%	96.46%	106.58%	96.14%	87.89%			87.89%
<b>January 2012</b>											
Minutes Scheduled			227,291.00	245,474.00	2,452,202.00	18,183.00	2,943,150.00	645,506.00			645,506.00
Minutes Provided		1,440.00	230,370.00	238,263.00	2,259,002.00	22,080.00	2,751,155.00	566,620.00			566,620.00





<b>Exhibit 43</b>											
<b>Summary of FY2012 Service Minutes Compliance Analysis</b>											
	<b>Sworn Personnel</b>							<b>Civilian Personnel</b>			
<b>Period:</b>	<b>Lieutenant</b>	<b>Sergeant</b>	<b>Bonus Deputy</b>	<b>Motors</b>	<b>Patrol (DSG)</b>	<b>Special Assignment Officer (SAO) Deputy</b>	<b>Total</b>	<b>Security Officer</b>	<b>Non-Sworn Support (LET, CSA, CA PCO)</b>	<b>Clerical</b>	<b>Total</b>
Variance:			3,079.00	(7,211.00)	(193,200.00)	3,897.00	(191,995.00)	(78,886.00)			(78,886.00)
% Compliance			101.35%	97.06%	92.12%	121.43%	93.48%	87.78%			87.78%
<b>February 2012</b>											
Minutes Scheduled			212,627.00	229,637.00	2,389,687.00	17,010.00	2,848,961.00	603,861.00			603,861.00
Minutes Provided			219,902.00	202,157.00	2,295,431.00	22,140.00	2,739,630.00	496,851.00			496,851.00
Variance:			7,275.00	(27,480.00)	(94,256.00)	5,130.00	(109,331.00)	(107,010.00)			(107,010.00)
% Compliance			103.42%	88.03%	96.06%	130.16%	96.16%	82.28%			82.28%
<b>March 2012</b>											
Minutes Scheduled			227,291.00	245,474.00	2,657,838.00	18,183.00	3,148,786.00	645,506.00			645,506.00
Minutes Provided			223,676.00	222,748.00	2,745,273.00	24,546.00	3,216,243.00	560,025.00			560,025.00
Variance:			(3,615.00)	(22,726.00)	87,435.00	6,363.00	67,457.00	(85,481.00)			(85,481.00)
% Compliance			98.41%	90.74%	103.29%	134.99%	102.14%	86.76%			86.76%
<b>April 2012</b>											
Minutes Scheduled			219,959.00	237,556.00	2,572,102.00	17,597.00	3,047,214.00	554,297.00			554,297.00
Minutes Provided			208,642.00	197,873.00	2,597,623.00	21,000.00	3,025,138.00	596,122.00			596,122.00
Variance:			(11,317.00)	(39,683.00)	25,521.00	3,403.00	(22,076.00)	41,825.00			41,825.00
% Compliance			94.85%	83.30%	100.99%	119.34%	99.28%	107.55%			107.55%
<b>May 2012</b>											
Minutes Scheduled			227,291.00	245,474.00	2,657,838.00	18,183.00	3,148,786.00	572,773.00			572,773.00
Minutes Provided		480.00	236,152.00	202,363.00	2,606,957.00	24,210.00	3,070,162.00	654,761.00			654,761.00



<b>Exhibit 43</b>											
<b>Summary of FY2012 Service Minutes Compliance Analysis</b>											
	<b>Sworn Personnel</b>							<b>Civilian Personnel</b>			
<b>Period:</b>	<b>Lieutenant</b>	<b>Sergeant</b>	<b>Bonus Deputy</b>	<b>Motors</b>	<b>Patrol (DSG)</b>	<b>Special Assignment Officer (SAO) Deputy</b>	<b>Total</b>	<b>Security Officer</b>	<b>Non-Sworn Support (LET, CSA, CA PCO)</b>	<b>Clerical</b>	<b>Total</b>
Variance:			8,861.00	(43,111.00)	(50,881.00)	6,027.00	(78,624.00)	81,988.00			81,988.00
% Compliance			103.90%	82.44%	98.09%	133.15%	97.50%	114.31%			114.31%
<b>June 2012</b>											
Minutes Scheduled			219,959.00	237,556.00	2,572,102.00	17,597.00	3,047,214.00	554,297.00			554,297.00
Minutes Provided			234,488.00	188,029.00	2,910,227.00	20,944.00	3,353,688.00	873,209.00		437.00	873,646.00
Variance:			14,529.00	(49,527.00)	338,125.00	3,347.00	306,474.00	318,912.00			318,912.00
% Compliance			106.61%	79.15%	113.15%	119.02%	110.06%	157.53%			157.61%
<b>Year to Date</b>											
Minutes Scheduled	-	-	2,414,270.00	2,673,821.00	28,350,559.00	214,679.00	33,653,329.00	7,407,632.00		-	7,407,632.00
Minutes Provided	480.00	8,944.00	2,532,854.00	2,414,435.00	28,276,091.00	254,664.00	33,487,468.00	7,253,731.00	15.00	437.00	7,254,183.00
Variance:			118,584.00	(259,386.00)	(74,468.00)	39,985.00	(165,861.00)	(153,901.00)			(153,449.00)
% Compliance			104.91%	90.30%	99.74%	118.63%	99.51%	97.92%			97.93%



<b>Exhibit 44</b>											
<b>Summary of FY2013 Services Minutes Compliance Analysis</b>											
<b>Sworn Personnel</b>								<b>Civilian Personnel</b>			
Period:	Lieutenant	Sergeant	Bonus Deputy	Motors	Patrol (DSG)	Special Assignment Officer (SAO) Deputy	Total	Security Officer	Non-Sworn Support (LET, CSA, CA PCO)	Clerical	Total
<b>Per 575 Approved Budget FY 2012-13</b>		214,680.00	2,683,500.00	2,898,180.00	31,756,560.00	214,680.00	37,767,600.00	11,378,040.00			11,378,040.00
<b>Per LASD's RAPS 500A Monthly Report</b>											
<b>July 2012</b>											
Minutes Scheduled		18,233.00	227,914.00	246,147.00	2,697,132.00	18,233.00	3,207,659.00	966,354.00			966,354.00
Minutes Provided		-	179,970.00	191,583.00	2,509,514.00	18,900.00	2,899,967.00	879,859.00			879,859.00
Variance:		(18,233.00)	(47,944.00)	(54,564.00)	(187,618.00)	667.00	(307,692.00)	(86,495.00)			(86,495.00)
% Compliance		0.00%	78.96%	77.83%	93.04%	103.66%	90.41%	91.05%			91.05%
<b>August 2012</b>											
Minutes Scheduled		18,233.00	227,914.00	246,147.00	2,697,132.00	18,233.00	3,207,659.00	966,354.00			966,354.00
Minutes Provided		4,020.00	206,378.00	193,515.00	2,747,505.00	22,380.00	3,173,798.00	1,043,319.00	479.00		1,043,798.00
Variance:		(14,213.00)	(21,536.00)	(52,632.00)	50,373.00	4,147.00	(33,861.00)	76,965.00	479.00		77,444.00
% Compliance		22.05%	90.55%	78.62%	101.87%	122.74%	98.94%	107.96%			108.01%
<b>September 2012</b>											
Minutes Scheduled		17,645.00	220,562.00	238,207.00	2,610,128.00	17,645.00	3,104,187.00	935,181.00			935,181.00
Minutes Provided	270.00	17,070.00	207,356.00	168,519.00	2,764,838.00	19,140.00	3,177,193.00	1,005,840.00			1,005,840.00
Variance:		(575.00)	(13,206.00)	(69,688.00)	154,710.00	1,495.00	73,006.00	70,659.00			70,659.00
% Compliance		96.74%	94.01%	70.74%	105.93%	108.47%	102.35%	107.56%			107.56%



<b>Exhibit 44</b>											
<b>Summary of FY2013 Services Minutes Compliance Analysis</b>											
<b>Sworn Personnel</b>								<b>Civilian Personnel</b>			
<b>Period:</b>	<b>Lieutenant</b>	<b>Sergeant</b>	<b>Bonus Deputy</b>	<b>Motors</b>	<b>Patrol (DSG)</b>	<b>Special Assignment Officer (SAO) Deputy</b>	<b>Total</b>	<b>Security Officer</b>	<b>Non-Sworn Support (LET, CSA, CA PCO)</b>	<b>Clerical</b>	<b>Total</b>
<b>October 2012</b>											
Minutes Scheduled		18,233.00	227,914.00	246,147.00	2,697,132.00	18,233.00	3,207,659.00	966,354.00			966,354.00
Minutes Provided		22,740.00	231,524.00	187,399.00	3,029,456.00	19,740.00	3,490,859.00	1,010,820.00	480.00		1,011,300.00
Variance:		4,507.00	3,610.00	(58,748.00)	332,324.00	1,507.00	283,200.00	44,466.00	480.00		44,946.00
% Compliance		124.72%	101.58%	76.13%	112.32%	108.27%	108.83%	104.60%			104.65%
<b>November 2012</b>											
Minutes Scheduled		17,645.00	220,562.00	238,207.00	2,610,128.00	17,645.00	3,104,187.00	935,181.00			935,181.00
Minutes Provided		20,497.00	212,374.00	168,510.00	2,731,671.00	16,380.00	3,149,432.00	963,000.00			963,000.00
Variance:		2,852.00	(8,188.00)	(69,697.00)	121,543.00	(1,265.00)	45,245.00	27,819.00			27,819.00
% Compliance		116.16%	96.29%	70.74%	104.66%	92.83%	101.46%	102.97%			102.97%
<b>December 2012</b>											
Minutes Scheduled		18,233.00	227,914.00	246,147.00	2,697,132.00	18,233.00	3,207,659.00	966,354.00			966,354.00
Minutes Provided		21,300.00	174,403.00	161,026.00	2,701,642.00	18,480.00	3,076,851.00	950,040.00			950,040.00
Variance:		3,067.00	(53,511.00)	(85,121.00)	4,510.00	247.00	(130,808.00)	(16,314.00)			(16,314.00)
% Compliance		116.82%	76.52%	65.42%	100.17%	101.35%	95.92%	98.31%			98.31%
<b>January 2013</b>											
Minutes Scheduled		18,233.00	227,914.00	246,147.00	2,697,132.00	18,233.00	3,207,659.00	966,354.00			966,354.00
Minutes Provided		21,720.00	225,507.00	175,815.00	2,861,859.00	24,085.00	3,308,986.00	986,458.00			986,458.00
Variance:		3,487.00	(2,407.00)	(70,332.00)	164,727.00	5,852.00	101,327.00	20,104.00			20,104.00



### Exhibit 44

### Summary of FY2013 Services Minutes Compliance Analysis

Sworn Personnel								Civilian Personnel			
Period:	Lieutenant	Sergeant	Bonus Deputy	Motors	Patrol (DSG)	Special Assignment Officer (SAO) Deputy	Total	Security Officer	Non-Sworn Support (LET, CSA, CA PCO)	Clerical	Total
% Compliance		119.12%	98.94%	71.43%	106.11%	132.10%	103.16%	102.08%			102.08%
<b>February 2013</b>											
Minutes Scheduled		16,469.00	205,858.00	222,326.00	2,436,120.00	16,469.00	2,897,242.00	872,836.00			872,836.00
Minutes Provided		18,216.00	216,333.00	156,847.00	2,403,567.00	17,400.00	2,812,363.00	867,975.00			867,975.00
Variance:		1,747.00	10,475.00	(65,479.00)	(32,553.00)	931.00	(84,879.00)	(4,861.00)			(4,861.00)
% Compliance		110.61%	105.09%	70.55%	98.66%	105.65%	97.07%	99.44%			99.44%
<b>March 2013</b>											
Minutes Scheduled		18,233.00	227,914.00	246,147.00	2,697,132.00	18,233.00	3,207,659.00	966,354.00			966,354.00
Minutes Provided		23,220.00	221,146.00	184,525.00	2,634,595.00	19,740.00	3,083,226.00	899,790.00			899,790.00
Variance:		4,987.00	(6,768.00)	(61,622.00)	(62,537.00)	1,507.00	(124,433.00)	(66,564.00)			(66,564.00)
% Compliance		127.35%	97.03%	74.97%	97.68%	108.27%	96.12%	93.11%			93.11%
<b>April 2013</b>											
Minutes Scheduled		17,645.00	220,562.00	238,207.00	2,610,128.00	17,645.00	3,104,187.00	935,181.00			935,181.00
Minutes Provided		23,506.00	219,803.00	188,220.00	2,681,431.00	20,760.00	3,133,720.00	867,780.00			867,780.00
Variance:		5,861.00	(759.00)	(49,987.00)	71,303.00	3,115.00	29,533.00	(67,401.00)			(67,401.00)
% Compliance		133.22%	99.66%	79.02%	102.73%	117.65%	100.95%	92.79%			92.79%
<b>May 2013</b>											
Minutes Scheduled		18,233.00	227,914.00	246,147.00	2,697,132.00	18,233.00	3,207,659.00	966,354.00			966,354.00
Minutes Provided		25,200.00	230,881.00	194,923.00	2,703,662.00	21,120.00	3,175,786.00	875,760.00			875,760.00
Variance:		6,967.00	2,967.00	(51,224.00)	6,530.00	2,887.00	(31,873.00)	(90,594.00)			(90,594.00)



### Exhibit 44

#### Summary of FY2013 Services Minutes Compliance Analysis

Sworn Personnel								Civilian Personnel			
Period:	Lieutenant	Sergeant	Bonus Deputy	Motors	Patrol (DSG)	Special Assignment Officer (SAO) Deputy	Total	Security Officer	Non-Sworn Support (LET, CSA, CA PCO)	Clerical	Total
% Compliance		138.21%	101.30%	79.19%	100.24%	115.83%	99.01%	90.63%			90.63%
<b>June 2013</b>											
Minutes Scheduled		17,645.00	220,562.00	238,207.00	2,610,128.00	17,645.00	3,104,187.00	935,181.00			935,181.00
Minutes Provided		20,258.00	198,605.00	162,539.00	2,703,513.00	18,960.00	3,103,875.00	761,618.00	360.00		761,978.00
Variance:		2,613.00	(21,957.00)	(75,668.00)	93,385.00	1,315.00	(312.00)	(173,563.00)			(173,203.00)
% Compliance		114.81%	90.04%	68.23%	103.58%	107.45%	99.99%	81.44%			81.48%
<b>Year to Date</b>											
Minutes Scheduled	-	214,680.00	2,683,504.00	2,898,183.00	31,756,556.00	214,680.00	37,767,603.00	11,378,038.00		-	11,378,038.00
Minutes Provided	270.00	217,747.00	2,524,280.00	2,133,421.00	32,473,253.00	237,085.00	37,586,056.00	11,112,259.00	1,319.00	-	11,113,578.00
Variance:	270.00	3,067.00	(159,224.00)	(764,762.00)	716,697.00	22,405.00	(181,547.00)	(265,779.00)			(264,460.00)
% Compliance		101.43%	94.07%	73.61%	102.26%	110.44%	99.52%	97.66%			97.68%



Exhibit 45												
Summary of Vacant Positions for FY 2011												
Staffing	Per Contract		For the Week of									
			09/20/10	10/25/10	11/29/10	12/28/10	01/18/11	02/22/11	03/28/11	04/25/11	05/31/11	06/28/11
	No. of Positions	Positions by Group	Vacant	Vacant	Vacant	Vacant	Vacant	Vacant	Vacant	Vacant	Vacant	Vacant
<b>Support Positions:</b>	FTE											
Captain	2	2	0	0	0	0	0	0	0	0	0	0
Lieutenant - Ops	2											
Lieutenant - Area	9	11	0	0	0	0	0	0	0	0	0	0
Sergeant - Ops	2											
Sergeant - D. B.	1											
Sergeant - Scheduling	1											
Sergeant - Rail	20											
Sergeant - Bus	21											
Sgt - Motorcycle Officer	3	48	1	1	1	1	1	1	1	1	1	1
Master Field Training Officer-B1												
Bonus I - Watch	4											
Bonus I - Investigators	10	14	1	1	1	1	1	1	0	0	0	0
Training Deputy	1	1	0	0	0	0	0	0	0	0	0	0
<b>Line Personnel:</b>	Purchased Minutes											
Bonus I - Team Leader Motorcycle Officer	1											
Bonus I - Canine Handler	6											
Bonus I - MET Deputy	2											
Bonus I - Team Leader	11	20	0	0	0	0	0	0	0	0	0	0
Sergeant		0					0					
Motorcycle Officers	22		1	1	1	1		1	1	1	2	0
Training Officer (Bonus Only)	0											
Generalist	239	261	10	9	9	6	9	3	5	3	0	3
Canine Support Costs												
Training												
Total Sworn Cost		357	13	12	12	9	11	6	7	5	3	4



<b>Exhibit 45</b>												
<b>Summary of Vacant Positions for FY 2011</b>												
	<b>Per Contract</b>		<b>For the Week of</b>									
			<b>09/20/10</b>	<b>10/25/10</b>	<b>11/29/10</b>	<b>12/28/10</b>	<b>01/18/11</b>	<b>02/22/11</b>	<b>03/28/11</b>	<b>04/25/11</b>	<b>05/31/11</b>	<b>06/28/11</b>
<b>Staffing</b>	<b>No. of Positions</b>	<b>Positions by Group</b>	<b>Vacant</b>	<b>Vacant</b>	<b>Vacant</b>	<b>Vacant</b>	<b>Vacant</b>	<b>Vacant</b>	<b>Vacant</b>	<b>Vacant</b>	<b>Vacant</b>	<b>Vacant</b>
	<b>FTE</b>											
Crime Analyst	1		0	0	0	0	0	0	0	0	0	0
Secretary V	2		0	0	0	0	0	0	0	0	0	0
Telephone Operator	0						0					
Operations Assistant I	2		0	0	0	0	0	0	0	0	0	0
Operations Assistant II	1		0	0	0	0	0	0	0	0	0	0
Evidence and Property Custodian II	0						0					
Information Systems Analyst II	1		0	0	0	0	0	0	0	0	0	
Suprv. Station Clerk	1		0	0	0	0	1	0	0	0	0	0
Data Control Clerk	1		0	0	0	0	0	0	0	0	0	0
Sheriff's Station Clerk II	13		4	4	4	7	5	5	5	5	6	6
Senior Clerk	4		0	0	0	0	0	0	1	1	1	1
Law Enforcement Technician	24	50	7	7	6	5	5	5	6	6	4	4
	<b>Purchased Minutes</b>											
Security Assistant	71	71	3	4	4	6	5	6	6	6	6	6
Total Non-Sworn		121	14	15	14	18	16	16	18	18	17	17





**Exhibit 46**

**Summary of Vacant Positions for FY 2012**

	Per Contract-July 2011-Oct 2011		For the Week of				Per Contract-Nov 2011-June 2012		For the Week of							
			07/26/ 11	08/31/ 11	09/27/ 11	10/18/ 11			11/29/ 11	12/13/ 11	1/31/ 12	02/29/ 12	03/27/ 12	04/19/ 12	05/29/ 12	06/26/ 12
Staffing	No. of Positio ns	Positio ns by Group	Vacant	Vacant	Vacant	Vacant	No. of Positio ns	Positio ns by Group	Vacant	Vacant	Vaca nt	Vacant	Vacant	Vacant	Vacant	Vacant
<b>Support Positions:</b>	FTE						FTE									
Captain	2	2	0	0	0	0	2		0	0	0	0	0	0	0	0
Lieutenant - Ops	2						2									
Lieutenant - Area	9	11	0	0	0	0	10	12	1	1	1	2	2	2	1	1
Sergeant - Ops	2						2									
Sergeant - D. B.	1						1									
Sergeant - Scheduling	1						1									
Sergeant - Rail	20						25									
Sergeant - Bus	21						21									
Sgt - Motorcycle Officer	3	48	0	0	0	0	4	54	6	6	6	6	6	7	6	6
Master Field Training Officer-B1																
Bonus I - Watch	4						4									
Bonus I - Investigators	10	14	0	0	0	0	10	14	0	0	0	0	0	0	0	0
Training Deputy	1	1	0	0	0	0	1	1	0	0	0	0	0	0	0	0
<b>Line Personnel:</b>	Purchas ed Minutes															
Bonus I - Team Leader Motorcycle Officer	1						1									
Bonus I - Canine Handler	10						10									
Bonus I - MET Deputy	2						2									
Bonus I - Team Leader	11	24	1	0	0	0	13	26	1	-1	-1	-1	-1	2	3	3
Sergeant		0														
Motorcycle Officers	22		0	1	1	1	27		6	6	6	5	5	5	4	5
Training Officer (Bonus Only)	0						0				0					
Generalist	235	257	3	4	0	3	293	320	61	53	65	0	27	33	26	28
Total Sworn Positions		357	4	5	1	4		427	75	65	77	12	39	49	40	43
Canine Support Costs																
Training																
Total Sworn Cost																



### Exhibit 46

### Summary of Vacant Positions for FY 2012

			For the Week of						For the Week of							
			07/26/ 11	08/31/ 11	09/27/ 11	10/18/ 11			11/29/ 11	12/13/ 11	1/31/ 12	02/29/ 12	03/27/ 12	04/19/ 12	05/29/ 12	06/26/ 12
Staffing	No. of Positio ns	Positio ns by Group	Vacant	Vacant	Vacant	Vacant	No. of Positio ns	Positio ns by Group	Vacant	Vacant	Vaca nt	Vacant	Vacant	Vacant	Vacant	Vacant
	FTE															
Crime Analyst	1		0	0	0	0	1		0	0	0	0	0	0	0	0
Secretary V	2		0	0	0	0	2		0	0	0	0	0	1	1	1
Telephone Operator	0						0						0			
Operations Assistant I	2		0	0	0	1	2		0	0	0	0	0	0	0	0
Operations Assistant II	1		0	0	0	0	2		1	1	1	0	0	0	0	0
Evidence and Property Custodian II							0				0					
Information Systems Analyst II	1		0	0	0	0	1		0	0	0	0	0	0	0	0
Suprv. Station Clerk	1		0	0	0	0	1		0	0	0	0	0		0	0
Data Control Clerk	1		0	0	0	0	1		0	0	0	0	0	0	0	0
Sheriff's Station Clerk II	13		6	5	7	7	15		7	7	7	7	7	7	8	8
Senior Clerk	4		1	1	0	0	4		0	0	0	0	0	0	0	0
Law Enforcement Technician	24	50	5	6	5	5	25	54	6	6	6	6	6	6	5	6
	Purchas ed Minutes															
Security Assistant	71	71	6	6	7	9	102	102	42	43	48	49	39	39	18	18
Total Non-Sworn		121	18	18	19	22		156	56	57	62	62	52	53	32	33



Exhibit 47													
Summary of Vacant Positions for FY 2013													
			For the Week of										
	Per Contract	Positions by Group	07/31/12	08/29/12	09/26/12	10/29/12	11/29/12	12/26/12	1/24/13	03/28/13	04/25/13	05/31/13	06/27/13
Staffing	No. of Positions		Vacant	Vacant	Vacant	Vacant	Vacant	Vacant	Vacant	Vacant	Vacant	Vacant	Vacant
<b>Support Positions:</b>	FTE												
Captain	2	2	0	0	0	0	0	0	1	0	0	2	2
Lieutenant - Ops	2												
Lieutenant - Area	10	12	1	1	1	1	2	2	3	1	1	0	0
Sergeant - Ops	2												
Sergeant - D. B.	1												
Sergeant - Scheduling	1												
Sergeant - Rail	24												
Sergeant - Bus	21												
Sgt - Motorcycle Officer	4	53	8	7	1	2	2	2	3	0	1	2	4
Master Field Training Officer-B1	1		0	1	0	0	0	0	0	0	0	0	0
Bonus I - Watch	4												
Bonus I - Investigators	12	16	2	2	2	2	2	2	2	1	2	1	0
Training Deputy	1	1	0	0	0	0	0	0	0	0	0	0	0
<b>Line Personnel:</b>	Purchased Minutes												
Bonus I - Team Leader Motorcycle Officer	1												
Bonus I - Canine Handler	10												
Bonus I - MET Deputy	2												
Bonus I - Team Leader	13	26	5	4	4	2	2	2	3	0	0	1	0
Sergeant	2	2	0	0	0	0	0	0	0	0	0	0	0



<b>Exhibit 47</b>													
<b>Summary of Vacant Positions for FY 2013</b>													
			For the Week of										
	Per Contract	Positions by Group	07/31/12	08/29/12	09/26/12	10/29/12	11/29/12	12/26/12	1/24/13	03/28/13	04/25/13	05/31/13	06/27/13
Staffing	No. of Positions		Vacant	Vacant	Vacant	Vacant	Vacant	Vacant	Vacant	Vacant	Vacant	Vacant	Vacant
Motorcycle Officers	27		5	6	6	5	5	5	4	0	0	0	2
Training Officer (Bonus Only)	20		0	20	15	0	0	0	0	1	1	1	0
Generalist	276	323	29	9	8	19	23	23	3	0	0	0	0
Total Sworn Cost		435	50	50	37	31	36	36	19	3	5	7	8
	FTE												
Crime Analyst	2		1	1	1	1	0	0	1	1	1	1	1
Secretary V	2		1	1	1	1	1	1	1	1	1	1	1
Telephone Operator	0												
Operations Assistant I	2		0	0	0	0	0	0	2	2	2	2	2
Operations Assistant II	4		2	2	2	2	2	2	0	2	0	0	0
Evidence and Property Custodian II	1		1	1	1	1	1	1	1		1	1	1
Information Systems Analyst II	1		0	0	0	0	0	0	0	0	0	0	0
Suprv. Station Clerk	1		0	0	0	0	0	0	0	0	0	0	0
Data Control Clerk	1		0	0	0	0	0	0	0	0	0	0	0
Sheriff's Station Clerk II	15		7	4	5	5	5	5	5	5	3	1	5
Senior Clerk	4		0	0	0	0	0	0	0	0	0	0	0
Law Enforcement Technician	25	58	6	6	6	5	1	4	4	5	6	4	4
	Purchased Minutes												
Security Assistant	106	106	5	4	4	5	5	7	7	9	9	15	16
Total Non-Sworn		164	23	19	20	20	15	20	21	25	23	25	30



### Exhibit 48

#### Summary of Internal CARP hours provided by TSB Support Personnel – Nine Months of FY 2011

	10/31/10	11/30/10	12/31/10	1/31/11	2/28/11	3/31/11	4/30/11	5/31/11	6/30/11	FY 2011
<b>Position</b>										
<b>Commander</b>	8	8	8	8	-	-	8	-	-	40
<b>Captain</b>	8	16	-	8	-	-	-	-	8	40
<b>Lieutenant</b>	120	184	192	144	128	136	112	136	96	1,248
<b>Sergeant</b>	160	240	368	256	256	240	200	348	288	2,356
<b>Subtotal</b>	<b>296</b>	<b>448</b>	<b>568</b>	<b>416</b>	<b>384</b>	<b>376</b>	<b>320</b>	<b>484</b>	<b>392</b>	<b>3,684</b>
<b>Bonus I</b>	264	368	424	360	272	384	264	296	336	2,968
<b>MFTO</b>	-	-	-	-	-	-	-	-	-	-
<b>Deputy Sheriff</b>	24	32	40	48	112	112	88	104	120	680
<b>Subtotal</b>	<b>288</b>	<b>400</b>	<b>464</b>	<b>408</b>	<b>384</b>	<b>496</b>	<b>352</b>	<b>400</b>	<b>456</b>	<b>3,648</b>
<b>LET</b>	144	168	176	88	32	72	0	16	0	696
<b>Total hours:</b>	<b>728</b>	<b>1,016</b>	<b>1,208</b>	<b>912</b>	<b>800</b>	<b>944</b>	<b>672</b>	<b>900</b>	<b>848</b>	<b>8,028</b>
<b>Total Minutes:</b>	<b>43,680</b>	<b>60,960</b>	<b>72,480</b>	<b>54,720</b>	<b>48,000</b>	<b>56,640</b>	<b>40,320</b>	<b>54,000</b>	<b>50,880</b>	<b>481,680</b>

**Note: TSB did not begin tracking internal CARP hours until October 2010, so this exhibit only reports CARP hours for nine months of FY 2011.**



### Exhibit 49

#### Summary of Internal CARP hours provided by TSB Support Personnel – FY 2012

Position	7/31/11	8/31/11	9/30/11	10/31/11	11/30/11	12/31/11	1/31/12	2/28/12	3/31/12	4/30/12	5/31/12	6/30/12	FY 2012
Commander	8	-	-	-	-	-	-	-	-	-	-	8	16
Captain	16	8	-	-	-	24	8	8	32	8	8	8	120
Lieutenant	112	152	112	112	136	168	144	104	104	136	56	96	1,432
Sergeant	248	312	368	336	312	312	320	216	280	200	160	280	3,344
<b>Subtotal</b>	<b>384</b>	<b>472</b>	<b>480</b>	<b>448</b>	<b>448</b>	<b>504</b>	<b>472</b>	<b>328</b>	<b>416</b>	<b>344</b>	<b>224</b>	<b>392</b>	<b>4,912</b>
Bonus I	224	272	248	216	200	224	216	200	248	200	192	344	2,784
MFTO	-	-	-	-	-	-	-	-	-	-	-	-	-
Deputy Sheriff	72	64	40	56	72	72	128	72	64	64	72	72	848
<b>Subtotal</b>	<b>296</b>	<b>336</b>	<b>288</b>	<b>272</b>	<b>272</b>	<b>296</b>	<b>344</b>	<b>272</b>	<b>312</b>	<b>264</b>	<b>264</b>	<b>416</b>	<b>3,632</b>
LET	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Total hours:</b>	<b>680</b>	<b>808</b>	<b>768</b>	<b>720</b>	<b>720</b>	<b>800</b>	<b>816</b>	<b>600</b>	<b>728</b>	<b>608</b>	<b>488</b>	<b>808</b>	<b>8,544</b>
<b>Total Minutes:</b>	<b>40,800</b>	<b>48,480</b>	<b>46,080</b>	<b>43,200</b>	<b>43,200</b>	<b>48,000</b>	<b>48,960</b>	<b>36,000</b>	<b>43,680</b>	<b>36,480</b>	<b>29,280</b>	<b>48,480</b>	<b>512,640</b>



### Exhibit 50

#### Summary of Internal CARP hours provided by TSB Support Personnel – FY 2013

Position	7/31/12	8/31/12	9/30/12	10/31/12	11/30/12	12/31/12	1/31/12	2/28/13	3/31/13	4/30/13	5/31/13	6/30/13	FY2013
Commander	-	-	-	8	-	-	-	-	-	8	-	-	16
Captain	-	-	-	8	8	-	16	-	8	24	-	-	64
Lieutenant	32	32	24	16	24	144	112	88	208	144	120	152	1,096
Sergeant	200	136	96	80	80	152	128	152	208	160	160	136	1,688
<b>Subtotal</b>	<b>232</b>	<b>168</b>	<b>120</b>	<b>112</b>	<b>112</b>	<b>296</b>	<b>256</b>	<b>240</b>	<b>424</b>	<b>336</b>	<b>280</b>	<b>288</b>	<b>2,864</b>
Bonus I	136	240	224	264	120	8	8	-	176	208	192	176	1,752
MFTO	-	-	-	-	-	-	-	-	-	-	16	8	24
Deputy Sheriff	24	48	56	56	40	24	32	24	80	96	96	96	672
<b>Subtotal</b>	<b>160</b>	<b>288</b>	<b>280</b>	<b>320</b>	<b>160</b>	<b>32</b>	<b>40</b>	<b>24</b>	<b>256</b>	<b>304</b>	<b>304</b>	<b>280</b>	<b>2,448</b>
LET	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total hours:</b>	<b>392</b>	<b>456</b>	<b>400</b>	<b>432</b>	<b>272</b>	<b>328</b>	<b>296</b>	<b>264</b>	<b>680</b>	<b>640</b>	<b>584</b>	<b>568</b>	<b>5,312</b>
<b>Total Minutes:</b>	<b>23,520</b>	<b>27,360</b>	<b>24,000</b>	<b>25,920</b>	<b>16,320</b>	<b>19,680</b>	<b>17,760</b>	<b>15,840</b>	<b>40,800</b>	<b>38,400</b>	<b>35,040</b>	<b>34,080</b>	<b>318,720</b>

**ATTACHMENT**

**Metro's Response**





**Metro**

Los Angeles County  
Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

213.922.2000 Tel  
metro.net

**DATE:** September 5, 2014

**TO:** Karen Gorman  
Inspector General

**FROM:** Duane Martin  
DEO, Project Management

**SUBJECT:** Updated Revised Response on the Audit of the Los Angeles Sheriff's  
Department Contract

Thank you for the opportunity to submit Metro's preliminary report on the Audit of the Los Angeles Sheriff's Department (LASD) contract. The attached document includes responses to the audit findings that directly pertain to LA Metro and did not provide responses to the findings that are specific to the LASD. In addition, Metro included short and long term comments to address and resolve findings of mutual concern.

Metro has had a longstanding relationship with the LASD. The agency is committed to partnering with LASD to develop best practices and incorporate improved oversight, policing strategies and metrics into a future contract.

Thank you for your assistance. If you have any questions, please contact me at (213) 922-7460.

cc: Arthur T. Leahy, Chief Executive Officer  
Lindy Lee, Deputy Chief Executive Officer

Updated Revised Response On the Audit of the Los Angeles Sheriff's  
Department Contract  
September 5, 2014

No.	Finding/Recommendation	Response	Response	LASD Status	METRO Short Term Action Item	METRO Short Term Action Item Status	METRO Long Term Action Item
1	There is no specific Transit Community Policing Plan or Program and a few community policing participants.	METRO	LASD has prepared a transit community policing plan which will be transmitted to Board for review.		Metro requested LASD to submit a Transit Community Policing Plan (TCPP), Metro will review, discuss and approve the TCPP for the current contract.	In Progress: On May 2014, Metro staff required LASD to submit a Transit Community Policing Plan. Due date: October 3, 2014	In Progress: Stipulated in the new Transit Policing Statement of Work on June 30, 2014. Task will be completed upon the release of the new Request For Proposal.
2	There is no planning or stated goals for community policing in a transit setting, including no reflection on the unique challenge of community policing for a transit population, no focus on quality of life issues, and a lack of service-orientation.	METRO	LASD will submit a community policing plan which will reflect the unique challenge of community policing for a transit population.		LASD will submit a Transit Community Policing Plan (TCPP) to Metro. Metro will review, discuss and approve the TCPP for the current contract.	In Progress: On May 2014, Metro staff required LASD to submit a Transit Community Policing Plan. Due Date: October 3, 2014	In Progress: Stipulated in the new Transit Policing Statement of Work on June 30, 2014. Task will be completed upon the release of the new Request For Proposal.
3	Transit Services Bureau assignment is not seen as a prestigious or desirable assignment.	METRO	The Sheriff recently elevated the Transit Services Bureau to be a "Division," which will result in better control and higher status.			Completed: Metro now has its' own dedicated LASD transit bureau. June 30, 2014	In Progress: Stipulated in the new Transit Policing Statement of Work on June 30, 2014. Task will be completed upon the release of the new Request For Proposal.

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No.	Finding/Recommendation	Response	Response	LASD Status	METRO Short Term Action Item	METRO Short Term Action Item Status	METRO Long Term Action Item
5	LASD has not developed a bus operations strategy.	METRO	Concur. Metro is requiring LASD to submit a Bus Operations Policing Strategy (BOPS).		LASD will submit a Bus Operations Policing Strategy (BOPS). Metro will submit this plan to the Board for review.	In Progress: Metro has required LASD to implement a bus operations strategy as part of their Transit Policing Plan. A monthly update will be provided to the Board. Due Date: December 31, 2014	In Progress: Stipulated in the new Transit Policing Statement of Work on June 30, 2014. Task will be completed upon the release of the new Request For Proposal.
6	The size of the transit service area (jurisdiction) makes it impossible for deputies assigned to the Transit Services Bureau to be first responders to all incidents of crime and disorder that occur on the bus network.	METRO	Metro will work with LASD to develop a plan to address TSB first responder issues, particularly in the context of the larger Bus network.		METRO and LASD continue to meet with Bus managers to develop strategies in policing the bus routes to further enhance the criminal impact teams. Staff will provide monthly updates to the Board.	Completed: July 31, 2014	In Progress: Stipulated in the new Transit Policing Statement of Work on June 30, 2014. Task will be completed upon the release of the new Request For Proposal.

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No.	Finding/Recommendation	Response	Response	LASD Status	METRO Short Term Action Item	METRO Short Term Action Item Status	METRO Long Term Action Item
11	METRO's strategy for enforcement of fare evasion must be revisited and alternative structural elements needed to be considered.	METRO	METRO will revisit our enforcement of fare evasion strategies.		METRO DEO of Security continues to meet with LASD, TAP, and OMB to revisit this finding and discuss alternative strategies. Metro will incorporate the audit findings into the current transit policing scope of work.	Completed: May 30, 2014	Completed: The EO of Service Planning has developed a task force to focus on the development of an agency-wide fare enforcement strategy. The stakeholders include Communications, Community Relations, Marketing, and Bus and Rail Operations. This task was completed on May 30, 2014.
13	The Communication Center facilities are inadequate for effective receipt and dispatching of calls for service and tracking unit location and availability.	METRO	As the Metro system expanded, modifications of existing office space were made to accommodate LASD's growth. In the long term, staff is designing a new Operations Control Center consisting of bus and rail operations. Staff will continue to work with LASD to accommodate expected future growth requirements.		METRO will meet with LASD to discuss alternative solution(s) to this finding.	In Progress: Staff is reviewing existing facilities and developing alternative space proposal to LASD. Due Date August 31, 2014.	In Progress: METRO Security Department is currently designing a new Operations Control Center that will consist of Bus and Rail Operations, Emergency Operations Center, and Security and Law Enforcement Dispatch Centers.

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18	METRO needs to substantially strengthen and enhance its oversight of LASD contract performance.	METRO	Staff retained a consultant to provide Project Management and evaluate the current oversight process. The consultant has been directed to develop a Security Program PMO Charter, mission, goals, document Metro Sheriff contract oversight process, and develop a Metro Transit Community oversight program.		METRO retained a Project Management Oversight consultant and drafted a 5 years Strategic Plan for Security Department to strategically assigned resources.	In Progress: Started on August 8, 2014.	In Progress: Metro will assign additional staff to enhance the current and future oversight of the transit policing contract.
19	LASD has not met many of the targets for performance indicators established including crime reduction, continuity of staff, fare enforcement saturation, and activity rates.	METRO	Metro staff will work with LASD to review the current performance indicators and will continue to monitor LASD's performance. Metro staff will require a corrective action plan from LASD for any metrics that are not consistently being met.		METRO is recommending modification to the FY15 contract extension to include stronger provisions.	In Progress: Working on proposed modifications to the contract.	In Progress: Stipulated in the new Transit Policing Statement of Work. Task will be completed upon the release of the new Request For Proposal.
21	The current contract with LASD does not include provisions for penalties nor incentives based on actual performance.	METRO	The current LASD MOU has "Termination of Default" but has not been effective. Metro will incorporate provisions for penalties and performance based incentives that are stronger.		Metro will work with the consultant to develop these performance measurements.	Metro will work with the consultant to develop these performance measurements.	In Progress: Stipulated in the new Transit Policing Statement of Work. Task will be completed upon the release of the new Request For Proposal.
23	Communication and coordination between ROC and LASD resources is indirect and through the telephone can result in loss of critical information and delays in response.	METRO	Metro will work with LASD to integrate communication systems and protocols. evaluate how we can improve communications. We will focus on the use of technology, dispatching protocols, staffing level, and training.		Work with LASD and Metro ROC and BOC to begin to integrate systems.		Will incorporate this in the RFP.

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24	LASD personal are provided reasonable access to videos recorded throughout Metro's system to support their law enforcement and investigated needs.	METRO	Metro will work with LASD to enhance our system video technology. Staff will expedite the process for releasing video.		In Progress: Staff will discuss with appropriate departments to enhance the current process. December 31, 2014.		
25	The current mobile phone validator used by LASD personnel to check TAP fares is inadequate and has limited functionality	METRO	Metro will provide phone validators by October 3, 2014. Metro has been working with the TAP Program and LASD to develop the next generation of the mobile phone validator.			In Progress: Staff is working to receive the 2nd generation mobile phone validator. Due Date: October 3, 2014.	
26	LASD personnel do not have adequate access to information on the layout of Metro facilities (blueprints, etc.) to facilitate tactical response to critical incidents	METRO	Metro will provide LASD with a set of blueprints for all facilities. Staff will coordinate with LASD for the distribution of these documents.		METRO worked with LexRay to transition the Red Line station maps into an electronic format that will be accessible through IOS and Android platform.	Completed: June 27, 2014	In Progress: Staff will support the transitions of the rail and facility maps into a digital format accessible from any IOS and Android devices.
30	Roles and responsibilities of METRO Security have not been clearly or appropriately defined, and in some instances, current roles extend beyond the authority and common practice of security officers.	METRO	The roles and responsibilities of LAMPS was established 2 years ago, which included integrating the three departments (LASD, Metro Security, and Private Security). Metro staff will continue to meet with LASD and Metro Security to review their current roles and responsibilities and address their concerns. As the scope of work may change overtime, the established roles and responsibilities will change/modify accordingly.		Metro and LASD is working together to address concerns to the roles and responsibilities of Metro Security.	In Progress: Metro directed Metro Security officers to provide a list of roles and responsibilities for Metro DEO of Security to review. Due Date: August 4, 2014.	In Progress: METRO will define the roles and responsibilities of METRO Security in the new Transit Policing Statement of Work.

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31	Many of the contract requirements regarding LASD oversight of Metro Security (Watch Commander oversight, training, etc.) have not been implemented.	METRO	Staff agreed with the finding and will incorporate in the new scope of work.		METRO DEO of Security met with METRO's procurement manager to discuss proposed modification to the FY15 contract extension to incorporate these recommendation s.	In Progress: Met with procurement on August 8, 2014 to discuss proposed modification.	In Progress: METRO will remove this contract requirement from the new Transit Policing Statement of Work. This was stipulated in the new Statement of Work on June 30, 2014. Task will be completed upon the release of the new Request For Proposal.
32	The dual chain of command created by assignment of an LASD Lieutenant as Director of METRO Security, while command and control is assigned to the METRO DEO, has not been effective in managing and supervising METRO Security.	METRO	Metro will be more effective in managing and supervising Metro Security through discussion and coordination within the Union Agreements.		Metro discussed and will direct LASD to eliminate the LASD Lieutenant as the Director of Metro Security.	In Progress: Staff has discussed this option with LASD and they agreed on May 26, 2014.	In Progress: METRO Security department will be seeking authorization from the Deputy Chief Executive Officer and Chief Executive Officer of METRO to reinstate the Director of Security as a Full-Time Equivalent position. The estimated completion date is December 31, 2014.

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33	Lack of clarity over appropriate regulatory requirements and oversight of METRO Security Officers, and compliance with these requirements, creates substantial operational and liability exposure.	METRO	Metro Security is governed by Public Utilities Code 30504. The policies and procedures for Metro security are in accordance to the Bureau of Security and Investigative Services and Post Certification.		DEO of Security request LASD and METRO Security staff to develop a matrix identifying the regulatory requirements as it pertains to law enforcement and security.	In Progress with an estimated completion date of October 31, 2014.	In Progress: Training, policies, and operations will be reevaluated and incorporated into the current standard operating procedures for METRO Security by December 31, 2014.
34	The payments made to LASD for FY2011 exceeded the Board approved amount and contract value by \$59,368.	METRO	Based on the current billing compliance process, it indicates that the billings did not exceed the Board authorized amount. However, staff will review this finding.		Staff began the process of reconciling the FY11 invoices and compared the findings with LASD's billing. The appropriate next steps will be identified after staff identify the reason(s) for this variance.	In-Progress: Staff has started the process of reviewing FY11 expenditures. Due Date September 30, 2014	
36	The current invoice review process for LASD billings and payments by METRO management needs to be expanded.	METRO	Metro has requested from LASD supporting documentations for their billing. METRO was provided the monthly minutes compliance (Form 500a) as supporting documentation. Metro will require LASD to provide electronically all time cards, OT slips, Deputy/Daily worksheets with each monthly invoice.			In Progress: Staff requested additional supporting documentations for their billing on August 8, 2014.	In Progress: Supporting billing documentations was stipulated in the new Transit Policing Statement of Work on June 30, 2014. Task will be completed upon the release of the new Request For Proposal.



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No.	Finding/Recommendation	Response	Response	LASD Status	METRO Short Term Action Item	METRO Short Term Action Item Status	METRO Long Term Action Item
47	A resource allocation analysis and strategy for using the limited resources available to the Transit Service Bureau has never been undertaken.	METRO	Metro will work with LASD to undertake a formalized resource allocation analysis to implement a strategic based allocation strategy.		METRO required LASD to focus on resource allocation that incorporates the following elements into the TCPP: time of day, crime stats based on intelligent lead policing, amount of services (bus/rail), response time.	In Progress: Staff has discussed this recommendation with LASD to include in their transit policing plan. Due Date: October 3, 2014	In Progress: This is stipulated in the new Transit Policing Statement of Work with a requirement of 3 years. In Progress: Task will be completed upon the release of the new Request for Proposal.
49	There is no indication that recommendations made in prior reviews have been followed up or implemented.	METRO	The primary recommendations from Sid Heal were implemented by establishing the current LAMPS Department. The goal of LAMPS was to address findings such as "no clear delineation of the roles and responsibilities for the two agencies" and the development of " 'extranet' site for the exchange of information that is limited to authorized parties from both agencies". All previous reviews will be evaluated.		Metro is reviewing prior recommendations and will look into modifying processes as applicable.	In-Progress: Staff is currently reviewing passed reviews to identify items that are pertinent for implementation. Due Date October 3, 2014	In Progress: Incorporate previous applicable recommendations into the new transit policing Statement of Work. The estimated completion time is October 3, 2014.
50	METRO has not taken advantage of periodic contract performance audits of the services provided by LASD as a contract compliance tool.	METRO	Metro will require annual audits and this language will be incorporated into future contracts.		Metro is working on reviewing invoices and supporting billing documentations. The consultant will help with the process of billing.	In Progress: Metro is working with Accounting Department and consultant.	In Progress: Metro will work with the consultant to enhance contract compliance process for the new transit policing contract. The estimated due date was August 15, 2014.

# **ATTACHMENT**

## **Los Angeles County Sheriff's Department's Management Response**



JOHN L. SCOTT, SHERIFF

County of Los Angeles  
Sheriff's Department Headquarters  
4700 Ramona Boulevard  
Monterey Park, California 91754-2169



May 7, 2014

Karen Gorman, Acting Inspector General  
Metropolitan Transportation Authority  
818 West 7<sup>th</sup> Street, Suite 500  
Los Angeles, California 90017

Dear Ms. Gorman:

I have reviewed the audit response prepared by Transit Services Bureau, which addresses Bazilio Cobb Associates' recommendations.

Attached is a response to each recommendation pertaining to the transit policing contract between the Los Angeles County Sheriff's Department and Metropolitan Transportation Authority.

Should you have any further questions, please contact Commander Claus, Transit Services Bureau, at (213) 922-3560.

Sincerely,

JOHN L. SCOTT  
SHERIFF

*A Tradition of Service*

LASD

# Transit Services Bureau

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## **Response to Audit Recommendations**

**5/6/2014**

The following document addresses Bazilio Cobb Associates' recommendations and TSB's response.

**Recommendation #1 (Page 16)**

**Metro should require LASD to develop a comprehensive Transit Community Policing Plan that clearly articulates the expectations and responsibilities of everyone associated with community policing responsibilities on the Metro system.**

The Sheriff's Department is in the process of preparing a comprehensive Transit Community Policing Plan. It will incorporate the responsibilities of all of the stakeholders within the Metro system and focus on quality of life issues that are important to LASD, Metro and the patrons of the Metro system. It is agreed that this approach to community policing will increase the partnership between LASD, Metro and Metro Security.

**Recommendation #2 (Page 18)**

**Metro should work with LASD to identify principles of community policing that are tailored for the transit environment as part of the core Transit Community Policing Plan. These principles should include 1) "felt presence," 2) community partnership, 3) crime prevention (principally through a focus on quality of life issues), 4) service-orientation, and 5) problem-solving.**

The Sheriff's Department agrees with the auditor and will work with Metro to accomplish this task. As stated in Recommendation #1, a Transit Community Policing Plan is currently being developed that will address all of these issues. Although a formal plan does not currently exist, the majority of these concerns are addressed in bi-weekly Intelligence-Led Policing meetings, briefed to patrol personnel, and enforced by special teams through target-specific operations.

**Recommendation #3 (Page 19)**

**Metro should require LASD to develop transit security operations as a specialized expertise within the department, complete with rigorous standards and training requirements.**

Currently, a deputy can transfer to TSB in three ways; be selected to a position covered by the Coveted Testing procedures, transfer from another patrol station, or transfer from a custody environment (this requires six months of patrol training, four at a patrol station and two at TSB). The department values its partnership with Metro and Metro Security and is seeking to enhance TSB as a specialty assignment.

Other large national transit policing agencies are configured as a division rather than a bureau. Given the complex needs and growth of this contract, it is recommended that the Department and Metro consider creating a division in the future dedicated to transit. A dedicated Transit Chief and support staff would allow more focus on the needs of TSB, the Metro Contract and increase the reputation of TSB within LASD and amongst other transit policing agencies.

Assigning deputies directly from the academy would be complicated to say the least. The idea is not without merit, but would take additional time to explore the feasibility of implementing such an idea. Developing an awareness program and visiting the jails to talk about transit policing opportunities would certainly increase interest in TSB, and eventually raise the reputation and status commensurate of other Sheriff stations.

**Recommendation #4 (Page 20)**

**Metro should require LASD to foster a culture of true accountability within TSB, including restructuring the Intelligence-Led Policing process so it provides a true system of accountability.**

TSB conducts bi-weekly ILP meetings to discuss and plan crime strategies. Changes have recently been made to hold service area lieutenants (SAL) more accountable for their respective areas. Verbal presentations to the unit commanders will be required to prove or disprove statistical improvements. This will also assist other SAL's who are experiencing the same type of crime trends or quality of life issues.

Support staff (SAO sergeants, OAI) is needed to be more proactive and hold others accountable for processing, dissemination, and accountability of information for their areas of operation. Currently, sworn supervisors are responsible for gathering information, compiling reports, and doing administrative tasks that should be done by professional staff. This would allow supervisors to be in the field, monitoring their personnel and focusing on community policing issues. TSB suggests that Metro add professional staff items to the contract to assist LASD with this recommendation.

**Recommendation #5 (Page 23)**

**Metro should require LASD to develop a bus operations policing strategy that reflects the nature of the challenges faced in addressing crime and disorder on buses, reflects the generally limited staffing available for bus policing and makes maximum use of local police resources in responding to serious bus crime and disorder incidents when an LASD Deputy is not nearby.**

The department agrees with the auditor and TSB is in the process of developing a bus operations plan. Historically, the majority of TSB resources were dedicated to the rail side of the operation. Years ago, a Bus Riding Team (BRT) was developed that consisted of six deputies. In 2013, the BRT was folded into the Crime Impact Team, dedicating more available resources to special bus operations.

The Los Angeles County Sheriff's Department is planning a summit in the near future to engage and seek support from all the local area police chiefs as it relates to crimes that occur on Metro buses in their jurisdictions. TSB is attempting to garner help from other jurisdictions in the event of a delayed TSB response in emergent situations or in the event they are flagged down for a crime on a Metro bus.

**Recommendation #6 (Page 25)**

**Metro should require the LASD to identify how the concerns of Metro will be addressed in its bus policing strategy. This strategy needs to be developed in collaboration with Metro bus managers and other jurisdictions through which the bus network runs.**

The department agrees with the auditor. This will be part of the bus operations plan discussed in Recommendation #5. Currently, service area lieutenants and team leaders meet with bus managers to discuss problem areas and concerns. As stated by the auditor, additional staff must be considered by Metro to make a positive impact on bus operations. The strategy will also incorporate a geographical approach to policing that should enhance overall effectiveness.

Additionally, the auditor suggested calls for service be handled by the law enforcement agency through which the bus is traveling. Although TSB may contact other agencies for a response in emergent situations, the expectation of other agencies handling routine and priority calls on Metro bus lines likely will not happen without compensation by Metro.

**Recommendation #7 (Page 26)**

**Metro should require LASD to reorganize the transit policing structure to provide geographical and neighborhood-based coverage for bus routes and neighborhood rail stations, and line-based coverage for rail lines and on-line crimes.**

TSB currently has one lieutenant for south county bus operations and one lieutenant for north county bus operations. We agree with the auditor that a geographical-based policing style would be more comprehensive. This would require three more lieutenants than what is currently assigned. Each lieutenant would command a team of deputies and security assistants to handle the day to-day issues of bus transit. The style of policing recommended by the auditor would certainly increase the current cost model, requiring additional personnel be added to the contract.

**Recommendation #8 (Page 29)**

**Metro should require LASD to develop a rail policing strategy that identifies how the challenges of providing a policing presence while addressing the need for response to rail crime and related incidents can best be met.**

The department agrees with the auditor. The rail system policing plan is being drafted.

**Recommendation #9 (Page 30)**

**Metro should require LASD, as part of their rail policing strategy, to outline actions that will effectively address the problems associated with homelessness, disorderly conduct and other issues in stations that unsettle the public using transit.**

The department agrees with the auditor that a portion of the policing strategy will include problems associated with the homeless and quality of life issues. However, TSB does not agree with the auditor's opinion of the efforts made by TSB in dealing with issues at Union Station. Deputies have made tremendous strides in cleaning up Union Station; examining and solving delicate homeless rights issues, solving quality of life issues, making the area a cleaner, hazard-free experience for patrons, etc. More is to be done, but to say that great strides have not been obtained, would simply not be reflective of the current status.

The audit cites a successful collaboration between the Los Angeles Police Department and the Central City East Association which led to the reduction of disorderly behavior as it relates to homelessness in the Skid row area. Skid row is not a success story and is populated by thousands of homeless men, women and children at all times of the day. In the last 7 months, TSB personnel have dramatically decreased the amount of homeless in Union Station by successfully partnering with building management to accomplish goals.

Additionally, Metro and TSB have agreed to request an additional service area lieutenant item for the 2014-2015 annual contract. This lieutenant position would be dedicated to Union Station, and be responsible for community outreach, as well as partnering with businesses involved at Union Station.

**Recommendation #10 (Page 31)**

**Metro should require LASD to train deputies assigned to transit in proximity patrolling (i.e., patrolling independently of each other while in close proximity) and how to create a "felt presence" when patrolling trains and stations.**

Certainly, rail policing is unique. Styles and methodology can be debated from county to county. Implementing proximity patrolling in some areas of our responsibility is a viable option; however, some areas do not afford us the opportunity to do so. Areas with high force incidents or violence need to have the deputies focused on one particular task, each providing security for the other. The use of force can happen quickly and the ability to overcome that resistance immediately may be the difference between life and death. Having two deputies in close proximity affords partners the ability to handle a situation swiftly and decisively.

The concept of proximity patrolling is a technique that was brought to the attention of TSB during this audit process. The TSB Training Office has been instructed to develop a curriculum on proximity patrolling for further review and discussion.

**Recommendation #11 (Page 31)**

**Metro should require LASD to perform a comprehensive review of the fare enforcement strategy to address the variety of roles deputies and Metro employees should play, as well as how to regularly measure compliance, how to target areas with greatest non-compliance, and how to reduce the confusion passengers face regarding tapping their cards.**



As stated in the audit, the original design of the rail system was an open, honest one. Statistical data has proven this to be a flawed design. We have been working with Metro to combat this issue. Educational signs and videos have been made and placed on the rail system and at rail stops. Some turn styles have been erected with limited success. All of these combined efforts put a small dent in this ever growing issue of fare evasion. Enforcement must play a more significant role in combating this issue.

Currently, deputies and security assistants conduct fare checks. Metro has begun a plan to arm their security force with hand held fare check devices as well. It is our opinion that Metro should increase their security staff and take over the majority of fare enforcement responsibilities. This would free the Sheriff's Department deputies to work on security issues, quality of life issues, and making an overall stress free experience for the patrons. Deputies would still have the ability to check fares, and do fare audits, while focusing on their main concern, safety on the rails and buses.

**Recommendation #12 (Page 35)**

**Metro and TSB should consider response times to be the time from when the call is received to the time when the deputy actually has contact at the incident (including all of the bulleted steps above) so that there is an accurate picture about how long it takes deputies to arrive on the scene when a call has been received.**

The Los Angeles County Sheriff's Department operates a universal system for collecting response times which begins at the time the call is dispatched to the time the deputy arrives at the call. The times are audited to ensure the bureau is falling within the standards of the department. Response times have been agreed upon in our contract for police services. Certainly, we are always looking for ways to improve our response times to ensure the public does not wait an unreasonable amount of time for services.

Recent audits of the Metro BOC have shown delays of transferring calls to LASD for service. TSB will work with Metro in an attempt to streamline Metro call center operations at the Rail Operations Center (ROC) and the Bus Operations Center (BOC).

**Recommendation #13 (Page 36)**

**Metro should work with LASD to find expanded quarters for the TSB Communications Center so that there is sufficient workspace and structure for effective processing of calls for service and tracking of unit status.**

We agree that space is an issue when it comes to our dispatch. It is anticipated Metro will be constructing a new building to house a Communications Center; however, construction will not be complete until 2020. Per our contract, Metro is responsible for the facilities which TSB occupies.

**Recommendation #14 (Page 37)**

**Metro should require LASD to amend the Monthly Report to include the actual time that calls are received and units arrive on scene, and ensure that a**

**comparison of response times measured by calls received to responding units on scene is included in every Monthly Report and presented at every ILP meeting.**

Monitoring response times is part of a captain's monthly review process. Both captains, North and South, monitor not only response times, but also are very involved in bi-weekly ILP meetings. We agree that a response time to a call for service on a bus should reflect the time the bus is actually stopped and the operator is contacted, not simply when the deputy is on the bus route. The audit is incorrect in that, as a rule, arrival time to a bus incident is when contact is made, not when the deputy arrives on the route. Briefings will be conducted to ensure all personnel understand when they should indicate they have arrived at a call.

**Recommendation #15 (Page 39)**

**Metro should require TSB to establish standard protocols for transferring emergency calls for service to local police agencies.**

The audit suggests that all emergent calls for service should be handled by the jurisdiction that the bus or rail is traveling through when the crime occurs. Further, the auditors state, this approach would allow TSB to "focus its operations on problem solving and preventative policing if it is to have the greatest impact on crime in the transit system." TSB does not agree with the findings as this approach would cause confusion for Metro as it relates to the handling of crime. This approach would equate to splitting the contract between multiple police agencies, with different reporting procedures, policies and protocols. To simplify matters, additional deputies should be added to the contract to handle bus related matters. As previously stated LASD will seek cooperation from local police agencies when they are flagged down for a transit related call or for an initial response to an emergent call, but LASD will maintain overall responsibility for the handling of the incident.

**Recommendation #16 (Page 37)**

**Metro should require LASD to develop a policy and procedure manual for TSB transit communications and require LASD to institute minimum training standards and special training for deputies and technicians assigned to call taking and dispatch for transit operations.**

All law enforcement technicians and watch deputies assigned to the dispatch center are required to attend department mandated training for complaint desk and dispatch procedures. These classes are augmented with watch briefings and unit orders which are contained in a TSB resource manual for desk operations.

Due to staffing limitations and the use of light duty personnel in desk positions on a short term basis, it is not feasible to send these personnel through formalized classes. A Desk Operations Mentoring Guidebook is currently being created by the training staff. This resource will be used to establish basic requirements and duties for those personnel working the desk on a short term basis.

**Recommendation #17 (Page 39)**

**Metro should require LASD to conduct a regular analysis to determine whether amending its deployment practices can help reduce incident response times.**

Transit Services Bureau is constantly reviewing statistical data to improve response times, crime suppression, as well as quality of life issues. Changes are made in personnel deployment based on several factors; ridership, crime trends, public perception, and quality of life issues. There is no panacea for response times. TSB's policing jurisdiction is vast, and traffic in Los Angeles plays a major factor in response times. Analyzing data during ILP meetings has proven effective. TSB will continue to conduct bi-weekly meetings and will place an emphasis on our deployment procedures, monitoring and improving an already very acceptable response time record. Additionally, converting to a geographical policing model should improve this operational aspect.

**Recommendation #18 (Page 41)**

**Metro should develop a comprehensive plan and methodology for oversight of LASD's performance under the contract and develop a staffing plan for implementing the contract oversight plan.**

The Sheriff's Department will work with Metro, providing all necessary data and assistance to assist them in this resolve, should they accept this recommendation.

**Recommendation #19 (Page 46)**

**Metro and LASD should work together to develop and adopt a comprehensive set of performance indicators, and ensure that performance on these indicators is periodically measured and reported to both Metro Executives and the Metro Board.**

TSB agrees that the department and Metro should work together to develop and adopt a comprehensive set of performance standards. The standards must be reviewed when there are changes to the number of personnel assigned to the unit, or additional areas of responsibility added by Metro.

**Recommendation #20 (Page 48)**

**Metro should require LASD to revise its approach to reporting crime on the Metro system to conform to the FBI's Uniform Crime Reporting standards and to include crime responded to and handled by municipal law enforcement agencies.**

The MTA Monthly Report has been changed to reflect the FBI's UCR standards. Transit related crimes that are handled by other agencies as a courtesy report are added to our crime reporting statistics when we are notified about the incident and are forwarded a copy of any subsequent reports.

**Recommendation #21 (Page 49)**

**Metro should identify specific critical elements of the contract with LASD that are essential and define specific penalties to be imposed if those essential elements are not adequately provided by LASD. Metro should also consider defining specific incentives for exceeding certain critical performance metrics.**

TSB disagrees with the suggestion of penalties for the use of CARP personnel. Although CARP personnel are not permanently assigned to TSB, the cadre is pulled from the most highly trained bureaus on the department (SEB, EOB, Aero, and COPS). TSB has worked with Metro to mandate that all CARP personnel receive safety training in both heavy and light rail prior to their assignment.

TSB is open to the development of performance metrics in the interest of enhancing service.

**Recommendation #22 (Page 52)**

**Metro and LASD should continue assigning LASD personnel in the BOC who can directly dispatch LASD resources, and can directly communicate with both bus and LASD dispatched personnel.**

The department agrees with the auditor. The BOC item is not in the contract and has been filled at the request of Metro. Items should be added to the contract to cover this position.

**Recommendation #23 (Page 53)**

**Metro and LASD should work together to co-locate LASD with personnel within rail operations with the capability to communicate directly with both rail operations and LASD dispatched personnel consistent with the approach used in the Bus Operations Center.**

As stated in Recommendation #13, Metro is in the process of building a facility to house a new Communication Center which is several years away. As a short term fix, an immediate solution would be the addition of law enforcement technician items to the contract to fill a position in the Rail Operations Center. This item would be a liaison to the Rail Operations Center, much like the item currently assigned to the BOC.

**Recommendation #24 (Page 53)**

**Metro and LASD should continue to work together to improve the coverage of the Metro system with video systems and further expedite the process for retrieval of requested video recordings.**

The department agrees with the auditor. The Metro video system is increasing through grants and TSB is involved in the preferred placement of cameras. TSB believes select TSB employees should have direct access to video systems to decrease the wait time for video on cases that are time sensitive.

**Recommendation #25 (Page 55)**

**The Metro TAP Program, Safety and Security, and LASD should work together to develop new applications and capabilities for the new mobile phone validator including citation issuance, checking for wants and warrants, and providing critical information.**

The department has been working with Metro to obtain new fare checking devices. TSB has been involved in a committee to decide the applications needed on the device to increase effectiveness. Delivery of these items is estimated to be in July of 2014.

**Recommendation #26 (Page 56)**

**Metro and LASD should work together to identify the specific needs and requirements for information on the layout of Metro facilities (blueprints, etc.) to facilitate tactical responses to critical incidents for LASD. An approach to provide this information in an electronic format that is up to date and easily accessible should be developed.**

The department agrees with the auditor and is working with Metro to improve overall knowledge of the layout of Metro buildings and facilities.

**Recommendation #27 (Page 65)**

**Metro should work with LASD to revise its approach to investigating and concluding on allegations made to include specific conclusions of fact using the four standard categories of exonerated, unfounded, not sustained, or sustained.**

The department takes the complaint process very seriously. The outcome of a Watch Commander Service Comment Report (WCSCR) is a tool used to monitor personnel performance, as well as how responsive LASD is to the citizens we serve. The conclusion of facts is simply verbiage resulting from, for the most part, extensive investigations and inquiries. Changing a category from "conduct appears reasonable" to "not sustained" is simply semantics. The Sheriff's Department takes pride in knowing that our complaint process is one of the most thorough processes in the Country. Additional oversight was built into the process, in that a complainant may contact the County Ombudsman for further review should they disagree with the outcome.

**Recommendation #28 (Page 67)**

**Metro should require LASD to ensure a more effective method of monitoring and enforcing the required timelines for sending acknowledgment and final outcome letters to individuals submitting complaints.**

TSB agrees with the auditor and steps are currently being implemented to ensure deadlines are adhered to.

**Recommendation #29 (Page 70)**

**Metro should require TSB to significantly expand the use of the LASD Performance Mentoring Program for employees with numerous personnel complaints, uses of force, or other indicators or potential concerns.**

The department feels that the current process and monitoring of personnel is an effective tool in performance oversight. The unit commanders will continue to be diligent in assuring their personnel are performing professionally and within the scope of the law. Further, both unit commanders continually audit their personnel regarding placement in the Performance Mentoring Program.

**Recommendation #30 (Page 73)**

**Metro should develop clear and appropriate roles and responsibilities for Metro Security and develop a written strategy for the Metro Security function. In developing this strategy, Metro should evaluate the use of Metro Security staff to perform fare enforcement, issue transit citations, and perform other non-law enforcement functions.**

TSB agrees with the auditor. TSB is working with Metro to assist with training of Metro Security in the use of fare checking devices and increase Metro Security's involvement in fare enforcement.

**Recommendation #31 (Page 74)**

**Metro should consider removing the requirements in the current contract focused on integrating the procedures, training, and operations of Metro Security and LASD from future contracts.**

The department agrees with the auditor.

**Recommendation #32 (Page 74)**

**Metro should consider creating a Metro position of Director of Security to replace the current LASD lieutenant, providing unified command for Metro Security under this position, and requiring ongoing communication and coordination with LASD as one of the key responsibilities of this position.**

The department agrees with the auditor and has requested a change in fiscal 2014-2015 Metro contract to reflect deleting the TSB oversight of Metro Security. TSB recommends an additional service area lieutenant position for Union Station that would have the collateral of being a liaison to the Director of Metro Security.

**Recommendation #33 (Page 75)**

**Metro, with the assistance of LASD, should clarify appropriate regulatory requirements and oversight of Metro Security Officers, and ensure training, policies, and operations are adequate to minimize operational and liability exposure.**

TSB will offer any assistance needed by Metro in regards to their security force. We can offer recommendations; however, LASD has no authority over Metro Security and their training requirements. As suggested in Recommendation #31, TSB oversight of Metro Security should be discontinued in future contracts.

**Recommendation #34 (Page 77)**

**Metro management should ensure payments made to LASD are capped at the Board approved amount and the contract value for each fiscal year. LASD should reimburse Metro for the overpayment of \$59,368 for FY2011, or Metro should obtain Board approval for the amount paid in excess of the Board approved amount.**

Per Contract Law, LASD only bills Metro for base (575) services and supplemental services requested by Metro. This item will require further investigation into why LASD billed Metro for services above the do not exceed amount.

**Recommendation #35 (Page 78)**

**Metro should require LASD comply with contract requirements to provide modified Service Minutes Detailed Reports (Form RAPS\_500E) which show the service minutes provided by personnel's names with the monthly contract service billing.**

Per Contract Law, the current contract with Metro states:

The invoice shall include as attachments all necessary supporting documents, schedules, deployment sheets, unit, name, location, assignment dates and time of service, straight time and over-time worked and other materials to fully support the total billing amount.

This section of the contract can be refined to meet Metro's requirements. The current LASD RAPS 500E Report provides the unit's call sign, date worked, and service minutes provided for the Metro contract. In the past, staff names and employee numbers were and still are available to Metro by requesting the unit's Deputy Daily Work Sheet report.

LASD attempted to create a modified RAPS 500E Report. The modified RAPS 500E Report did not meet the request to add staff names and employee numbers to the report. LASD will need to make programming changes in RAPS to complete the modified RAPS 500E Report.

**Recommendation #36 (Page 79)**

**Metro Management should require LASD to provide adequate supporting documents for each monthly service contract billing, and selectively review LASD personnel time cards and daily worksheets to ensure LASD personnel time records billed are supported with adequate documents.**

Per Contract Law, billing supporting document requirements need to be further refined in the contract to meet Metro's requirements. Timecards, overtime slips, and Deputy Daily Worksheets are currently available upon request.

**Recommendation #37 (Page 80)**

**Metro should require LASD to ensure that adequate and accurate documentation of hours and minutes billed to Metro under the contract is readily available to support the amounts billed to Metro.**

Billing supporting document requirements need to be further refined in the contract to meet Metro's requirements. Timecards, overtime slips, and Deputy Daily Worksheets are currently available upon request. However, requested documents were provided to the auditor which generated a second and third layer of requested documents for the original task. Requests for documents were labor intensive. All documents need to be pulled manually from Timei, CWTPPs and RAPS. Three timekeepers were the only qualified personnel to pull timekeeping reports which was done on an overtime basis. Pay & Leave Management was asked for support in completing these requests, however, they declined due the requests being too labor intensive and insufficient personnel available.

**Recommendation #38 (Page 82)**

**Metro should require LASD to provide a more stable monthly level of both sworn and civilian staffing, and should bill for actual minutes provided, and adjust its billing accordingly if LASD reduced its personnel assigned to TSB in a particular month.**

Per Contract Law, LASD service levels will fluctuate from month to month due to season peaks in use of leave benefits by some personnel on specialized teams. Service compliance is achieved over a 12 month period. Minutes are used to determine compliance and not billing. If minutes are used to determine billing, Metro may have to set aside additional contingency funds to pay for service provided above the base level of service on the SH-AD 575 Service Level Form.

**Recommendation #39 (Page 83)**

**LASD did not adjust rates billed for services or units when management, supervisory, or support positions included in billing rates were vacant.**

Per Contract Law, the Metro contract for law enforcement services with LASD is a "Service Unit Agreement." Metro only contracts for the line services. The LASD management and support staff are charged to Metro as an overhead cost that is applied to the line service units. LASD does not bill Metro for FTE LASD management and support staff. Budgeted management and support positions are used to determine what overhead to include in the rate for line service units. LASD provides the management and support staff needed to fulfill the management and support function required for LASD to fulfill its management and support obligations under the contract.



LASD is required to follow policies regarding transfers and promotions that result in some vacancies throughout the year. The rates for the Metro contract would be impacted by additional overhead costs to adjust the rates monthly based on changes in vacancies for management and support staff.

**Recommendation #40 (Page 86)**

**Metro should require LASD adjust the monthly service contract invoiced amount billed to Metro based on the number of management and supervisory hours actually provided.**

Response is the same as #39.

Additionally, the audit used an expected 2088 productive work hours for the LASD staff assigned to the Metro contract. The actual productive work hours are 1789. The report does not account for staff that are unavailable for a variety of reasons (injured on duty, FMLA, Military Leave, ...) that are assigned to the contract. Expected unavailable personnel are taken into account when determining management and support positions to budget for the Metro contract.

**Recommendation #41 (Page 86)**

**LASD did not maintain adequate records of time spent at TSB by CARP personnel. In addition, CARP time exceeded the target maximum rate of 10%.**

TSB has improved the record keeping for CARP personnel, as well as the number of spots filled each month at TSB. The Department is working hard to eliminate the need for CARP personnel. While still necessary, CARP personnel are closely monitored, making sure they are as productive as personnel assigned to TSB.

Per Contract Law, there is no targeted maximum CARP rate in the current law enforcement services contract. For the new law enforcement services contract, Metro has included language regarding CARPing in the RFI (Request for Interest).

**Recommendation #42 (Page 87)**

**Some LASD personnel time was billed twice to Metro when personnel whose costs are included in the billing rates also generate direct billed time.**

Per Contract Law, for FY 2013 CARPs provided by TSB management and support staff, a credit was given to Metro in the FY 2014 rates. LASD will continue this practice. LASD will work with Metro to determine what credit Metro should receive for the CARPs provided by TSB management and support staff in FY 2011 and FY 2012.

**Recommendation #43 (Page 88)**

**LASD does not have an adequate time recording system and record keeping track of personnel's time records related to the Metro Contract.**

TSB utilizes the same time record method as the rest of the department. TSB will work with Metro to clarify any and all discrepancies regarding hours worked, and how these hours are documented. Per Contract Law, service minutes provided are used to measure contract compliance. The data is RAPS 500A and 500E Reports and Deputy Daily Worksheets.

**Recommendation #44 (Page 89)**

**The LASD has not provided the staffing levels required under the contract. There are continued vacancies in officer number and supervisory and managerial positions.**

Per Contract Law, the contract is a service level contract based on the service needed. Metro does not contract for staff (FTE's). LASD has made significant improvement in decreasing line Patrol Deputy (877) vacancies at TSB. On April 9, 2012, TSB had 69 line Patrol Deputy (877) vacancies (Per PIMS). On April 20, 2014, TSB had 13 line Patrol Deputy (877) vacancies (Per eHR).

**Recommendation #45 (Page 89)**

**Metro should require LASD to submit information on actual staffing of overhead and support positions should be submitted with each invoice for payment.**

Per Contract Law, LASD can provide information to Metro regarding staff assigned to the contract as needed. It is impractical to adjust overhead rates because vacancies change monthly. LASD does not bill Metro for FTE LASD management and support staff. Budgeted management and support positions are used to determine what overhead to include in the rate for line service units. LASD provides the management and support staff needed to fulfill the management and support function required for LASD to fulfill its management and support obligations under the contract.

**Recommendation #46 (Page 90)**

**Metro should require LASD to eliminate or minimize the assignment of CARP personnel to TSB. If it is not possible to end the practice, TSB should ensure that those Deputies that are CARPED to TSB receive special transit training before being assigned to duty.**

LASD is in the process of eliminating or reducing CARPing by December 2014. All CARP personnel assigned to TSB are highly trained department members. A number of them are experts in homeless issues, tactical issues, and planners of large events. Their productivity is closely monitored and their performance measures are the same as any TSB deputy. CARP personnel are partnered with a full time TSB deputy to maximize safety and effectiveness.

**Recommendation #47 (Page 91)**

**Metro and LASD should contract a resource allocation analysis that determines the best assignment pattern that meets the objectives set forth in the contract, and ensures that staffing is strategic.**

Per Contract Law, in 2011, a Zero Based Budgeting plan for LASD staffing at TSB was done in conjunction with plans for opening the first phase of the Expo Line.

TSB is working with Metro to look at current deployment practices and what changes can be made to improve the overall policing of the rail and bus systems. A preliminary plan should be available to Metro by Fall, 2014.

**Recommendation #48 (Page 92)**

**Metro should base the number of sergeants employed under the contract on the number required to maintain a ratio of one supervisor to seven Deputies, as well as a supervisor being in charge of each specialized unit.**

The department has submitted its proposed 2014-2015 contract increases to Metro which increases the number of supervisors. However, it is the belief of TSB that the ratio of supervisors in some areas should be 1:5 because of the vast area that is covered by TSB (1,433 square miles).

**Recommendation #49 (Page 97)**

**Metro should consider formally reviewing and following up on issues identified and recommendations made in all reviews or assessments completed regarding safety, security or law enforcement services.**

LASD will work with Metro and assist with any information they need to accomplish this task. It is suggested that TSB be involved in this process as well.

**Recommendation #50 (Page 97)**

**Metro should consider conducting periodic contract performance and compliance audits to ensure contract requirements are fully met, required services are being adequately provided, and contract billings are consistent with services provided.**

The department's Contract Law Bureau will provide any and all necessary documentation requested by Metro.