

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

**Review of Metro Measures to Reduce
COVID-19 Transmission**

Report No. 21-AUD-05

March 1, 2021



TABLE OF CONTENTS

	<u>Page</u>
INTRODUCTION	1
OBJECTIVES, SCOPE AND METHODOLOGY	1
BACKGROUND	2
RESULTS OF REVIEW	4
I. Metro Policies, Procedures, and Measures Taken to Reduce COVID-19 Transmission	4
II. Metro System Video Recordings	13
III. Bus Audio Recordings/Radio Scanner Transportation Channel.....	25
CONCLUSION	26
RECOMMENDATIONS	27
MANAGEMENT COMMENTS TO RECOMMENDATIONS	28
OIG EVALUATION OF MANAGEMENT RESPONSE	28
APPENDICES	
A. Management Response to Draft Report	29
B. CDC Guidelines for Social Distancing	39
C. California Physical Distancing Protocol	40
D. Los Angeles County Protocol for Social Distancing	44
E. Metro Public Health/Pandemic Plan for Infectious/Communicable Diseases (<i>Selected Pages</i>)	49
F. Metro USG HVAC System & COVID-19 Changes or Modifications	55
G. Metro Digital COVID-19 Reporting System User Guide.....	60
H. Metro Social Distancing – Additional Safety Measures	61

I.	Metro Operations General Notice – Required Face Coverings	66
J.	Weekly, Bi-Weekly, Monthly Updates on Response to COVID-19 (<i>Sample</i>).....	67
K.	Metro COVID-19 Daily Briefs to Employees (<i>Sample</i>).....	72
L.	Metro Healthy Offices Tool Kit.....	75
M.	Metro COVID-19 Process and Responsibilities for Directors/Managers/Supervisors	78
N.	Metro COVID-19 Prevention Program (CPP) (<i>Selected Pages</i>).....	82
O.	UCLA Institute of Transportation Studies – Policy Brief on Crowding.....	86
P.	Final Report Distribution.....	88

List of Tables

Table 1. Bus Video Footage Reviewed.....	13
Table 2. Metro Bus and Railcar Seats	16
Table 3. Ridership Level in Bus Sample	17
Table 4. Railcar Video Footage Reviewed	20
Table 5. Ridership Level in Railcar Sample	24

List of Figures

Figure 1. Face Covering Signage on Metro Buses	6
Figure 2. Plexiglass on Metro's Micro Transit	7
Figure 3. Signage Discouraging Social Gatherings.....	10
Figure 4. Operator Barrier and Decal.....	11
Figure 5. Yellow Safety Chain.....	12
Figure 6. Metro Bus Operators Improperly Wearing or Not Wearing a Mask.....	15
Figure 7. Crowded Bus on Line 51.....	17
Figure 8. No Social Distancing Among Passengers.....	18
Figure 9. Bus 8751 Properly Used Safety Chain.....	19
Figure 10. Metro Rail Operators Improperly Wearing or Not Wearing a Mask.....	21
Figure 11. Metro Rail Operator Entered Without a Mask.....	21
Figure 12. Riders Improperly Wearing a Mask or Not Wearing a Mask.....	22
Figure 13. Social Distancing Not Observed on Blue Line Railcar.....	22
Figure 14. Social Distancing Not Observed on Red Line Railcar.....	23



DATE: March 1, 2021

TO: Metro Board of Directors
Metro Chief Executive Officer

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

**E-SIGNED by Yvonne Zheng
on 2021-03-01 13:09:57 PST**

SUBJECT: Final Report on Review of Metro Measures to Reduce COVID-19 Transmission
Report No. 21-AUD-05

INTRODUCTION

In November 2020, the Metro Board Chair requested the Office of the Inspector General (OIG) to review Metro patrons' compliance with, and Metro's handling of social distancing and other measures to help our community and assist in Los Angeles County's desire to address the pandemic impacts. As part of our ongoing effort to assist Metro in improving the effectiveness and efficiency of its operations, we performed reviews and observations on passengers' compliance with social distancing, use of masks, and related issues on Metro buses and railcars. We also reviewed Metro's policies, procedures, and measures taken to comply with federal, state, and local public health orders and guidelines.

OBJECTIVES, SCOPE, AND METHODOLOGY

The goal of this review is to determine whether the public is complying with state, local government and Metro requirements to wear a mask and socially distance on the Metro System. We will also identify if Metro has taken appropriate measures recommended and/or required by Centers for Disease Control and Prevention (CDC), State of California Physical Distancing Protocol, Los Angeles City and County Social Distancing Protocol and Federal instructions. In particular, the objectives of this review were to:

1. Determine whether Metro has policies and procedures in place to help reduce COVID-19 virus transmission;
2. Observe and document Metro operators' and passengers' use of face masks and social distancing practices; and
3. Determine whether Metro passengers comply with Metro signage and announcements suggested by CDC, and ordered by the State of California, City and County of Los Angeles particularly concerning social distancing protocols and use of face masks.

To accomplish these objectives, we:

- Searched and reviewed protocols and orders by the CDC, the State of California, and the City and County of Los Angeles;
- Searched and reviewed UCLA Institute of Transportation Studies on the issue of vehicle crowding;
- Held meetings to discuss pandemic related issues and practices with Metro officials and staff;
- Reviewed Metro COVID-19 related policies and procedures including measures taken and daily briefs;
- Reviewed ten Metro bus video recordings and documented the result of observations;
- Reviewed eight Metro railcar video recordings and documented the result of observations;
- Listened to two weeks of all Metro bus transportation to dispatch/operations center audio interaction on a radio scanner transportation channel reporting crowded buses or other chatter; and
- Performed other procedures deemed necessary to accomplish our review objectives.

This review is not an audit. Therefore, Government Auditing Standards were not strictly applied in this review.

BACKGROUND

Since COVID-19 broke out and a pandemic was declared in early 2020, the Centers for Disease Control and Prevention (CDC), State of California, City and County of Los Angeles, and FTA released directives, health orders, and guidelines to the public to address the pandemic and reduce the transmission of COVID-19.

PUBLIC HEALTH ORDERS AND GUIDELINES

Following are sample orders and guidelines issued by federal, state, and local agencies:

1. CDC Guidelines for Social Distancing

The Centers for Disease Control and Prevention (CDC) provides guidelines for social distancing and hand hygiene for passengers taking public transit.

a. Social Distance

When possible, consider traveling during non-peak hours when there are likely to be fewer people. Follow social distancing guidelines by staying at least 6 feet (2 meters) from people who are not from your household. For example:

- Avoid gathering in groups, and stay out of crowded spaces when possible, especially at transit stations and stops;

- Consider skipping a row of seats between yourself and other riders if possible;
- Enter and exit buses through rear entry doors if possible; and
- Look for social distancing instructions or physical guides offered by transit authorities (for example, floor decals or signs indicating where to stand or sit to remain at least 6 feet apart from others).

b. Practice hand hygiene

- After you leave the transit station or stop, use hand sanitizer containing at least 60% alcohol; and
- When you arrive at your destination, wash your hands with soap and water for at least 20 seconds.

(See Appendix B for details, or <https://www.cdc.gov/coronavirus/2019-ncov/daily-life-coping/using-transportation.html#PublicTransit>)

On January 21, 2021, the new Presidential administration issued an Executive Order requiring masks to be worn in compliance with CDC guidelines on all public transportation.

2. California Physical Distancing Protocol

The State of California published “Physical Distancing Protocol”, which indicates, “Businesses must implement all applicable measures listed below and be prepared to explain why any measure that is not implemented is not applicable to the business.” The measures include:

- a. Signage;
- b. Measures to Protect Employee Health;
- c. Measures to Prevent Crowds from Gathering;
- d. Measures to Keep People at Least Six Feet Apart;
- e. Measures to Present Unnecessary Contact; and
- f. Measures to Increase Sanitization.

(See Appendix C for the specific measures.)

3. Los Angeles County Protocol for Social Distancing

The Los Angeles County “Protocol for Social Distancing” has the same measures as the California Physical Distancing Protocol but also includes the following measures to promote infection control.

- a. Visitors arriving at the establishment are reminded to wear a face covering at all times (except while eating or drinking). A face covering should be made available to visitors who arrive without them.

- b. Symptom checks are conducted before visitors may enter the facility. The checks can be done in person or through signage posted at the entrance to the facility stating that visitors with these symptoms should not enter the premises.
(See Appendix D for the specific measures.)

This review focused on whether Metro passengers and operators comply with the above requirements and guidelines.

RESULTS OF REVIEW

I. Metro Policies, Procedures and Measures Taken to Reduce COVID-19 Transmission

Our review found that Metro has taken various measures including issuing policies and procedures to reduce COVID-19 transmission.

A. Metro Public Health/Pandemic Plan for Infectious/Communicable Diseases

On March 20, 2020, Metro Risk, Safety, and Asset Management, in collaboration with Human Capital & Development, Emergency Preparedness and other departments, issued “Metro Public Health/Pandemic Plan for Infectious/Communicable Diseases” to prepare the agency for dealing with the effect of a health pandemic, communicable and other reportable diseases. It describes Metro’s actions to manage future influenza or COVID-19 pandemics. The objectives of the Plan are to reduce the spread of the virus and related illnesses within the agency and maintain essential activities. The Plan was assembled to promote good workplace practices in planning for a possible influenza pandemic.

This Plan draws the best information available from the World Health Organization, Los Angeles County Department of Public Health, and the Centers for Disease Control and Prevention. It includes key discussions of Metro policy, business continuity planning for a pandemic, service delivery plan, and responsibilities of employees and different departments. It provides information to minimize the spread of the infection among customers, employees, and business partners and discusses strategies on seasonal influenza vaccination, personal hygiene, disinfection of facilities and vehicles, restriction of workplace entry of people with influenza symptoms, social distancing, management of staff who become ill at work, and food handling. (See Appendix E for details.)

B. Metro USG HVAC System & COVID-19 Changes or Modifications

On July 21, 2020, Metro General Services Management sent an interoffice memo to Metro Management and USG Occupants to clarify employees’ inquiries about the potential for exposure and transmission of COVID-19 through the air within a closed envelope building such as Union Station Gateway (USG), and the efficacy of Metro Heating Ventilation and Air Condition (HVAC) system. Metro states, *“The system is robust and provides significant outside air and flow per person without enhancement... However, we still need to mention that nothing can trap and kill*

the COVID viral microbes... SO PLEASE be safe! Wear your mask, wash your hands frequently and practice social distancing". The World Health Organization (WHO) has stated that the virus can be transmitted through airborne transmission and there is currently no technology that will catch/trap the microbes as they float through the air. However, Metro has taken action to step up cleaning methods and is working with vendors, the CDC, and the EPA to look for new technologies that could help to fight this pandemic. The Corporate Safety and Building Services Departments made several recommendations to address the employees' concerns. (See Appendix F for details.)

Bus and Railcar Systems.

In December 2020, Bus Vehicle Technology & Acquisition, Rail Vehicle Engineering presented information on how to help Metro improve its bus and rail ventilation systems, and their research on disinfection methods. They evaluated switching to a higher air filtration system and the use of Ultraviolet-C treatment systems. They are currently collaborating with the US Environmental Protection Agency (EPA) to evaluate the technologies for efficacy and anticipate receiving the preliminary results by the second quarter of this year (2021).

In January 2021, Metro's COVID-19 Task Force presented updates on "COVID-19 Disinfection – Explored Solutions". Explored solutions included were Ultraviolet-C radiation, chemical surface disinfectants, air purification systems and applied disinfection films. The solutions are being evaluated based on their efficacy against SARS-CoV-2 (the virus that causes COVID-19), residual efficacy after application, ease of use, long term effects, and quality. Some technologies are currently being independently tested by the EPA for viricidal efficacy verification. The report stated that the most promising solutions have shown to be chemical surface disinfectants and air purification and filtration systems. The Environmental Protection Agency (EPA) is continuously evaluating various chemical disinfectants for their residual efficacy. Current efforts are focused on increasing ventilation and air filtration.

C. Metro Digital COVID-19 Reporting System User Guide

On September 28, 2020, Metro Corporate Safety issued "Digital COVID-19 Reporting System Guide". The COVID-19 Reporting System is a digital system for reporting and tracking suspected and confirmed cases. It encompasses the processes and resources for Metro Supervisors' to report COVID suspected or confirmed cases. This program provides a method for Metro management to manage, evaluate, and ensure cases are processed accordingly. (See Appendix G for details.)

D. Metro Social Distancing – Additional Safety Measures

Operations issued General Notices, interoffice memos, and reports providing information and measures being taken by Metro and reminding personnel to follow these measures:

The General Notices and interoffice memos address face coverings, social distancing requirements and additional safety measures for COVID-19. Employees are instructed to perform the "Employee Symptom Self-Check" prior to entering a Metro facility. The memos also include the Metro Social Distancing Protocol and guidelines on how to put on the N-95 Mask/Respirator. (See Appendix H – April 22, 2020.)

On May 7, 2020, Operations issued a General Notice that effective May 11, 2020 and continuing until further notice, Metro will require face coverings for all frontline employees, including Bus and Rail Operators and Transit Operations Supervisors whose duties involve public contact. Metro will also require customers traveling on the bus and rail systems to wear face coverings. As part of the messaging, buses and trains were to display a message in the headsign: FACE COVERINGS REQUIRED ON METRO BUSES AND TRAINS.” (See Appendix I.)

Figure 1. Face Covering Signage on Metro Buses



On December 8, 2020, Operations issued an interoffice memo to all Maintenance and Engineering personnel informing them that Metro continues to take the necessary measures to keep them safe by increasing the intensity and frequency of cleaning, ensuring that social distancing measures are being followed and that personal protective equipment (PPE) is provided and worn. Employees were reminded to follow the posted Metro Social Distancing Protocol.

E. Weekly, Bi-Weekly, Monthly Updates on Response to COVID-19

Since the pandemic started, Metro’s CEO has been providing weekly, bi-weekly, and/or monthly updates to Metro Board of Directors on their response to COVID-19. See Appendix J for a sample update. These updates, among others, discuss:

- Incident Management,
- Union Station Update,
- Operations,
- Communications & Government Relations,
- Workforce and Leave Policy,
- Construction, and
- Finance.

On the December 18, 2020 monthly update to the Board of Directors regarding Metro’s response to COVID-19, the CEO reported several measures in place to respond to federal, state, and local directives during this national emergency. Measures Metro has taken include:

- Metro's Incident Management Team, in coordination with the Emergency Operations Center and several departments, continues to respond to public health and safety updates, and intelligence briefs, among others.
- Sending out daily COVID-19 briefs under the emergency alert system to all field staff and maintains a 24-hour duty-officer to receive COVID-19 related calls from staff or external stakeholders.
- Conducting field observations.
- Fronts of buses are no longer roped off to allow for additional capacity in support of social distancing for customers.
- Implementing bus service adjustments to include added trips on weekdays and weekends.
- Launching Metro's Micro Transit service on December 13, 2020 where face masks are required, plexiglass partitions have been installed, and vehicles are cleaned daily. (See Figure 2.)
- Rail service continuing with enhanced modified Sunday schedule and use of weekday railcars to the extent possible.
- Strengthened cleaning regimes on all vehicles, stations and terminals with EPA-approved disinfectants.

The CEO reported that Operations will continue to monitor ridership and adjust service as necessary.

Figure 2. Plexiglass on Metro's Micro Transit



F. COVID-19 Task Force

Metro formed the COVID-19 Task Force which is comprised of Rail Vehicle Engineering, Bus Engineering, General Services, Corporate Safety, and Facilities Services. Its main goal is to combat the spread of COVID-19 on Metro's bus and rail systems, facilities, and in the USG building.

G. Joint Efforts to Address Service Cancellation due to Operator Absences Caused by COVID-19

Operations continues to partner with Human Capital Development and Corporate Safety to follow all quarantine and return to work directives for those employees who have either been exposed or tested positive for COVID-19. The number of positive cases among agency staff and contractors has doubled in a few months (which is in line with positive cases across Los Angeles County).

According to Operations, these impacts to transit service will likely continue until the number of COVID-19 cases decreases in our region and more employees can return to work. Other transit agencies around the region, including LADOT and Foothill Transit, are experiencing similar challenges. The surge in early 2021 has resulted in increased illness and reduced ridership, as well as further delay in employees returning to work and, consequently, an increase in paid administrative leave usage and staffing shortages. Operations and HCD have put together a strike team to help get through the processing of cases of those employees returning to work. Also, in 2021, Operations stated they will hire enough operators to follow all safety protocols without using excessive overtime. The first class of 30 Bus Operators started on January 11, 2021 which included six weeks of class time plus one week for DMV licensing. The second class of 30 Bus Operators was on January 25, 2021 and followed the same schedule as the first class. According to Operations, they will begin a new class every three to four weeks when the current class moves from classroom to “behind the wheel” instruction. To further increase training throughout, Operations Central Instruction is developing a schedule and securing additional classrooms and/or equipment to support more than one class at a time.

H. COVID-19 Daily Brief

Metro’s Communications Department sends the COVID-19 Daily Brief to all employees through email that includes updates of construction during this pandemic, confirmed cases and COVID-19 (Safety) Helpline, among others. The Daily Brief also reminds employees to wear a face covering, wash your hands regularly, avoid touching your face, and keep a distance of at least six feet from others whenever possible. (See Appendix K.)

I. Metro Healthy Offices Tool Kit

The tool kit is to standardize Metro’s internal COVID-19 safety messages that focuses on key COVID-19 messages to help keep employees safe. It covers face coverings, social distancing and symptoms checks. (See Appendix L.)

J. COVID-19 Process and Responsibilities for Directors/Managers/Supervisors

This publication shows procedures/flowcharts on how to handle employee/contractor with a suspected or confirmed COVID-19 case, or who was in close contact with someone who has COVID-19 or symptoms. It also includes a contact list to identify employees/contractors who were in close contact with the suspected or positive individual starting two days before symptoms started until sent home. (See Appendix M.)

K. Metro Micro

Launched in mid-December 2020, Metro Micro is Metro's new on-demand rideshare service, offering trips within several zones in LA County. It allows customers to replace short, solo trips with a flexible service operated by Metro employees in vehicles that hold up to ten passengers. The service is meant to be a safe and convenient option for quick trips around town and with fewer transfers. To protect the operators and customers, face masks are required, plexiglass partitions have been installed, and the vehicles are cleaned daily. While Metro Micro vehicles have capacity to seat a maximum of ten passengers, capacity has been limited to 50% to allow for distancing unless traveling with family and friends in the same small group.

L. Metro COVID-19 Prevention Program (CPP)

On December 18, 2020, the Risk, Safety and Asset Management Department, in collaboration with Human Capital & Development, has developed the COVID-19 Prevention Program (CPP). This program is consistent with Metro's policy to provide a safe and healthy working environment for employees and a safe transit system for the public. To mitigate the spread of the COVID-19 illness which has resulted in the current pandemic, Metro has developed this prevention program to effectively educate and protect its employees, customers, and business partners. This document describes Metro's actions since the pandemic began in early 2020 in the United States, to manage the COVID-19 pandemic. These measures and actions will continue into the foreseeable future until the pandemic is under control. The objectives of the COVID-19 Prevention Program are: (a) reducing spread of the coronavirus called SRAS-CoV-2, and related COVID-19 illness within the agency, maintaining a safe and healthy workplace and (b) maintaining essential activities. (See Appendix N for select pages.)

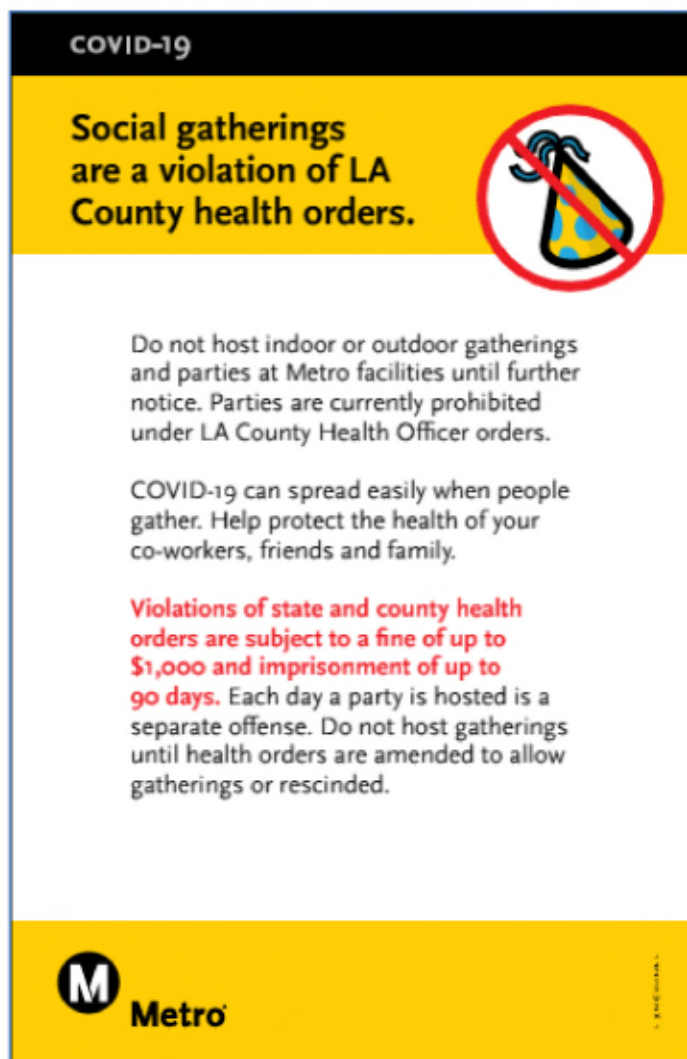
M. 24-Hour Duty Officer

Based on the CEO's Monthly Update to the Board on November 20, 2020, Metro maintains a 24-hour duty-officer to receive COVID-19 related calls from staff or external stakeholders.

N. Poster on Social Gatherings

On the COVID-19 Daily Brief email dated December 23, 2020, Metro announced that the poster below will be hung at all Metro locations over the next week to remind all building occupants of the social gatherings rule on Metro property.

Figure 3. Signage Discouraging Social Gatherings



O. Operator Barrier and Decal

On October 4, 2020 Metro issued Operations General Notice (OPS#20-033) stating that that personal protective equipment (gloves, face coverings, face shields, hand sanitizer) is available at all work locations and the use of the plexiglass Operator barrier is mandatory. Also, decals have been installed on all buses (on the barrier door and on the floor) to remind patrons to remain six feet behind the yellow line (see Figure 4). Rear door boarding and alighting will continue until further notice. Front door usage will be reserved for ADA patrons and customers who express a need to use the ramp or kneeling device to board or alight.

Figure 4: Operator Barrier and Decal



P. Safety Chain

As an added effort to encourage social distancing on board Metro buses while still allowing passengers to occupy the seats designated for elderly and disabled customers, Maintenance installed a yellow safety chain behind the Operator's compartment on each bus (Figure 5). This chain can be readily disconnected allowing the Operator to assist with boarding, alighting, or securement of passengers with disabilities or those who use mobility aids such as walkers or wheelchairs. The chain is the only approved device for physically separating the Operator from the passenger compartment of the bus. Use is optional. (Operations General Notice (OPS#20-050) November 6, 2020)

Figure 5: Yellow Safety Chain



Q. Street Team

According to Metro Communications Department, Metro created a Street Team Program, which is comprised of 16 teams of two people, each works Monday through Thursday for six hours per day to distribute masks to customers. The hours vary by location and need. The locations change every day and range from riding the subways, light rail and buses to being stationary at key rail stations and bus stops. The bus routes and stops are selected using the equity assessment tool. Various combinations of the teams were in the community at different times during the months of June, July, September, October, and December 2020.

The combination of masks, hand sanitizer and travel safety tips is fairly new and started in December 2020 in partnership with the Los Angeles County Department of Public Health (LACDPH) which supplied the hand sanitizers and the travel tips that were added to Metro's mask packages. After distributing more than 5,800 packages, the Street Team ran out of their supplies and they started using Metro's masks and hand sanitizer and the travel tips from LACDPH. Those packages were so well received that Street Team will restart distribution of this combination in February. In addition to the combination packages, the street teams have distributed approximately 50,000 masks.

In addition to the paid street teams, Metro Communication Department asked employees who are riding our system to serve as ambassadors and hand out masks as they ride to and from work. Masks are also being handed out by law enforcement. As of February 3, employee ambassadors and law enforcement personnel have distributed 12,500 masks.

R. Field Observations by Operations

Metro conducts daily & weekly field observations to determine customer mask compliance and to ensure that bus operators do not rope off the front of buses using American with Disabilities Act (ADA) straps. In addition, Operations also uses bus router technology, Vehicle Operations (VO) personnel, and customer feedback. The VO teams are monitoring the bus service to ensure that

adjustments on schedules can be made, as necessary, in support of In-Service On-Time Performance (ISOTP) and safety initiatives at Metro.

The most current report showed customer mask compliance on buses was about 99.5% and the number of buses roped off in the front was about 18%. This showed a more favorable response from customers and operators than at the beginning of the pandemic.

Operations continue to train, educate, and counsel the Operators and take disciplinary action as necessary against those who do not comply with the policy. Notices and information relative to COVID-19 are disseminated to stress the importance of maintaining safety.

II. Metro System Video Recordings

To determine how Metro passengers and operators comply with COVID-19 orders, we selected a sample of bus and rail video recordings to observe the use of masks and social distancing practices.

A. Bus Video Footage

For our sample, we chose ten bus lines operating in different parts of Los Angeles, including Hollywood, Wilshire and Harbor Gateway Center areas. We chose peak times in the morning and evening, on a weekday and a weekend during the period November 28 to December 2, 2020. Table 1 below shows the dates and times of the video footage we reviewed.

Table 1. Bus Video Footage Reviewed

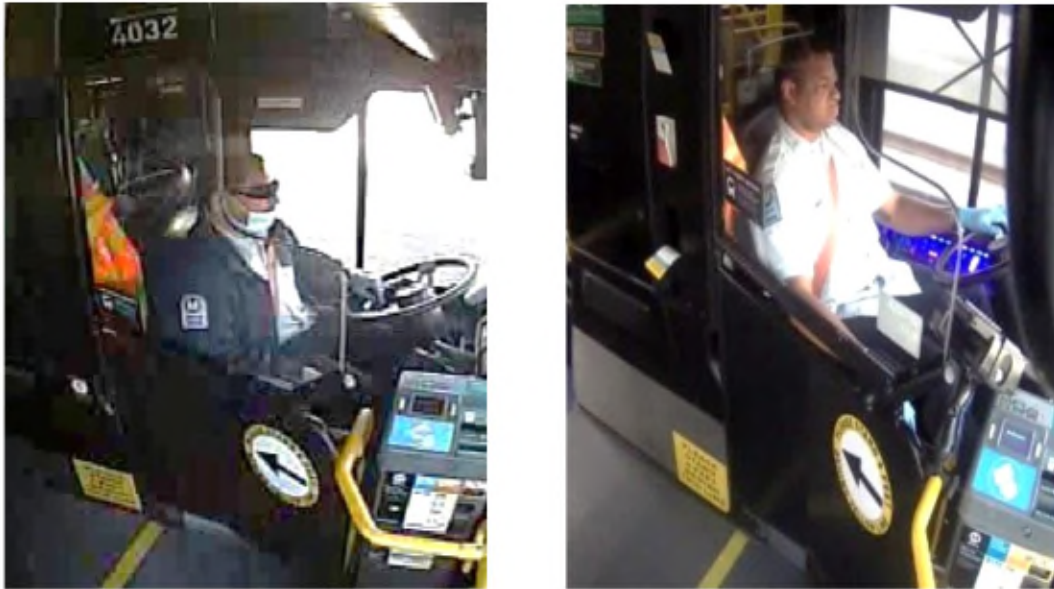
Number	Bus #	Line	Route	Date	Time
1	9420	204	Hollywood-Athens	11/28/2020 Saturday	8:30am
2	3954	51	Wilshire Center-DNLA- Harbor Gateway	12/2/2020 Wednesday	4:45pm
3	3954	51	Wilshire Center-DNLA- Harbor Gateway	12/1/2020 Tuesday	7:15am
4	8711	910	El Monte Station - Harbor Gateway Transit Center	11/28/2020 Saturday	8:30am
5	8711	910	El Monte Station - Harbor Gateway Transit Center	11/28/2020 Saturday	7:00pm
6	4032	51	Wilshire Center-DNLA- Harbor Gateway	11/28/2020 Saturday	8:30am
7	4032	51	Wilshire Center-DNLA- Harbor Gateway	11/28/2020 Saturday	7:00pm

8	8712	204	Hollywood-Athens	12/2/2020 Tuesday	4:45pm
9	8712	204	Hollywood-Athens	12/2/2020 Tuesday	7:15am
10	8751	910	El Monte Station - Harbor Gateway Transit Center	12/2/2020 Tuesday	4:45pm

For these ten buses, we watched video footage to observe the use of masks, crowding on the bus, social distancing practices, use of physical barriers for the driver, and visible signage encouraging social distancing and use of mask.

1. **Masks.** Masks can protect people from getting exposed to the COVID-19 virus. They can also prevent people from spreading the virus to others. Masks are a simple but critical tactic in slowing the spread of the COVID-19 virus, so it is crucial that passengers and employees wear masks to protect themselves and others. During our review of the sample bus videos, we observed the following:
 - a. Drivers: Four Operators (40 percent) out of the ten Operators in our sample did not wear a mask or wore the mask improperly (exposing their nose and mouth).
 - Three Operators did not wear their masks: Buses 9420 (morning), 8711 (evening), and 8751 (evening). (Note: the 8711 bus carried no passengers during the duration of the video we observed.) The Operator for 8751 used a safety chain to separate himself from the rest of the bus, so he may have felt secure in not wearing a mask. However, Metro Operators should always wear masks to set a good example for Metro passengers.
 - The Operator on Bus 4032 (morning) wore a mask, but it did not cover his mouth or nose, as shown below.

Figure 6. Metro Bus Operators Improperly Wearing a Mask or Not Wearing a Mask



- b. Passengers: Overall, most passengers wore masks; however, we found the following passengers who did not wear a mask:
- One passenger out of about ten riders on Bus 9420 (morning);
 - One passenger out of three on Bus 4032 (evening); and
 - One passenger on a full Bus 3954 (morning)

2. Crowding.

On October 1, 2020, the University of California Office of the President published a research paper entitled “When is Public Transit Too Crowded, and How Has This Changed During the Pandemic?”. The paper discusses that the UCLA Institute of Transportation Studies reviewed the websites of 200 transit agencies across the U.S. and found that “*there is no industrywide standard for vehicle crowding before the pandemic, nor is there one now — as definitions of socially distanced transit vary widely.*” The research paper also states “*Of the 200 transit agencies investigated, only 92 (46 percent) publicized their pre-pandemic crowding standards, and only 84 (42 percent) publicized their pandemic-specific crowding standards. This suggests that a majority of transit operators either have not formally adopted, or do not publicize, these standards. During the COVID-19 pandemic, many transit agencies’ public documents and communications stress the importance of 6-foot social distancing by passengers and the frequent cleaning and disinfecting of their vehicles, but do not specify the maximum number of passengers that can be safely onboard. Instead, vague references to “blocking of some seats” and “keep[ing] every other row empty” are common.*” (See Appendix O for more details.)

We obtained the following seat capacity and the maximum passengers (pre-pandemic) for the Metro bus and railcar models. We observed in this review:

Table 2: Metro Bus and Railcar Seats

Description	Type	Seats	Standees	Maximum Passengers (Pre- Pandemic)
3900s/4100s 40-Foot Bus	Bus	40	8	48
8700s/9400s Articulated Bus	Bus	55-57	11	68
Light Railcar	Railcar	76	68	144
Heavy Railcar	Railcar	57	74	131

Source: Metro Intranet

According to Operations, Metro now has a maximum load standard of 75% of seated capacity during any 20-minute time slice during peak periods and 60-minute time slices during off peak period, compared to 130% pre-COVID. There can be several reasons for heavy loads, including daily fluctuations of ridership between trips, cancelled or late trips, and increasing ridership. Thus, Operations stated that it is nearly impossible to guarantee zero trips exceeding the load standard. To allow for day to day variations in operations and demand, 98% of weekly trips should not exceed an average of 75% of seated capacity during any 20-minute time slice during peak periods and 60-minute time slices during off peak period. This is consistent with pre-COVID conditions.

Metro bus ridership level. To determine the ridership level on the buses, we divided the observed number of passengers with the seat capacity of the bus model shown in Table 2. Based on the sample review, we found that most Metro buses were not crowded except for one instance in which the bus appeared to be full with passengers standing in the aisle. The following is the result of our review:

- Four buses were 0 to 10 percent full;
- Five buses were 11 to 35 percent full; and
- One bus was 100 percent full with passengers standing in the aisle.

Table 3 shows the ridership level on the buses that we reviewed.

Table 3. Ridership Level in Bus Sample

Number	Bus #	Line	Route	Date	Time	Ridership Level
1	9420	204	Hollywood-Athens	11/28/2020	8:30am	18%
2	3954	51	Wilshire Center-DNLA-Harbor Gateway	12/02/2020	4:45pm	22%
3	3954	51	Wilshire Center-DNLA-Harbor Gateway	12/01/2020	7:15am	100%
4	8711	910	El Monte Station - Harbor Gateway Transit Center	11/28/2020	8:30am	2%
5	8711	910	El Monte Station - Harbor Gateway Transit Center	11/28/2020	7:00pm	0%
6	4032	51	Wilshire Center-DNLA-Harbor Gateway	11/28/2020	8:30am	9%
7	4032	51	Wilshire Center-DNLA-Harbor Gateway	11/28/2020	7:00pm	7%
8	8712	204	Hollywood-Athens	12/02/2020	4:45pm	35%
9	8712	204	Hollywood-Athens	12/02/2020	7:15am	16%
10	8751	910	El Monte Station - Harbor Gateway Transit Center	12/02/2020	4:45pm	11%

Figure 7 is Bus 3954 (Line 51), which was completely full on a weekday morning. The cause for this level of crowding is unknown. According to Metro Service Planning, there are several reasons for an overcrowded bus including a service breakdown on the same line earlier, availability of operators, and cancellation of service.

Figure 7. Crowded Bus on Line 51



During the pandemic, Operations monitors loads on a weekly basis. They provide the information of top-heavy lines to Bus Operations and the Division Directors to adjust service if necessary and avoid cancelling service on heavy lines, if possible. They added about 2.5% additional service in December 2020 in addition to redistributing service on less performing lines to heavier lines. As funding becomes available for additional service, the priority would be to add service on high occupancy lines.

3. **Social Distancing**. Because the coronavirus can travel on liquid droplets breathed or coughed by infected people, an array of health authorities recommends staying away from crowds and maintaining physical separation from others. The CDC specifically recommends a six-foot buffer.

According to Operations, Metro has signage posted on buses, trains and stations reminding people to stay six feet apart. There are also regular announcements at stations reminding people of the mask requirements and to stay six feet apart.

From our sample of 10 buses, we observed that Metro passengers chose not to maintain a six-foot distance from other passengers although there was plenty of room on the bus even when the bus was at a low occupancy rate.

- Bus 9420 (morning), passengers chose to sit near other passengers less than six feet away and did not skip a row of seats between themselves and other passengers even though other seats were available.

Figure 8. No Social Distancing Among Passengers



- Bus 3954 (evening), riders chose to sit in the back of the bus although there were plenty of empty seats in front of the bus.

- Bus 8751 (evening), there were only six passengers on the bus, with plenty of space available. However, a passenger sat near another passenger who appeared not to be a travel companion.
4. **Bus Operator Safety Barriers.** Physical barriers are a safety measure for the drivers. We found Metro drivers using the plexiglass barriers in 100 percent of our 10 observed buses. We believe Metro made use of the barriers mandatory following the 2019 OIG report on Bus Operators Barriers Use that recommended mandatory use of the barriers.
 5. **Safety Chain.** As discussed earlier, according to Operations General Notice (OPS#20-050) November 6, 2020, as an added effort to encourage social distancing while still allowing passengers to occupy the seats designated for elderly and disabled customers, Maintenance installed a yellow safety chain behind the Operator's compartment on each bus. This chain can be readily disconnected to allow the Operator to assist with boarding, alighting, or securement of passengers with disabilities. The chain is the only approved device for separating the Operator from the passenger compartment of the bus and is optional. During our review of bus video, we found one bus out of ten (Bus 8751, evening) using the safety chain.

Figure 9. Bus 8751 Properly Used Safety Chain



6. **Signage.** Because of the camera angle, clarity of the video footage, and lack of zoom focus, we were unable to see whether there were signs inside the buses requesting customers to wear masks or maintain a distance of six feet from each other. The headers on the outside of the buses do alternate between the destination name and "Masks Required" signage.

B. Rail Video Footage

For our sample, we included three rail lines and 17 rail cars from different parts of Los Angeles, including 7th & Metro to North Hollywood and San Pedro St. to Willowbrook/Rosa Park Station.

We chose peak times, in the morning, the evening, on a weekday and a weekend during the period November 4 to December 11, 2020 to review. Table 4 below shows the dates and times of the video footage we reviewed.

Table 4: Rail Video Footage Reviewed

Number	Railcar #	Line	Route	Date	Time
1	1089	Blue	Willow St to 7th & Metro	11/28/2020 Saturday	8:30am
2	1098	Blue	Willow St to 7th & Metro	11/28/2020 Saturday	8:30am
3	1122	Blue	San Pedro St to Willowbrook/Rosa Parks	11/30/2020 Monday	4:45pm
4	159 A/B	Blue	San Pedro St to Willowbrook/Rosa Parks	11/30/2020 Monday	4:45pm
5	1100	Blue	Willow St to 7th & Metro	11/07/2020 Saturday	8:30am
6	1063	Expo	Expo/Sepulveda to Downtown Santa Monica	11/30/2020 Monday	7:15am
7	1046	Expo	Expo/Sepulveda to Downtown Santa Monica	12/10/2020 Thursday	6:30am
8	1046	Expo	Expo/Sepulveda to Downtown Santa Monica	12/11/2020 Friday	6:30pm
9	1004	Expo	Expo Park/USC to 7th & Metro	11/28/2020 Saturday	7:00pm
10	1066	Expo	Expo/Sepulveda to Downtown Santa Monica	12/11/2020 Friday	7:00am
11	1066	Expo	Expo/Sepulveda to Downtown Santa Monica	12/11/2020 Friday	7:00pm
12	578	Red	7th & Metro to NH	11/04/2020 Wednesday	4:30pm
13	536	Red	7th & Metro to NH	11/04/2020 Wednesday	4:30pm
14	575	Red	7th & Metro to NH	11/04/2020 Wednesday	4:30pm
15	565	Red	7th & Metro to NH	11/04/2020 Wednesday	4:30pm
16	569	Red	Hollywood/Highland to Union Station	11/07/2020 Saturday	8:15am
17	596	Red	Hollywood/Highland to Union Station	11/07/2020 Saturday	8:15am

1. **Masks.** In our review, we received seven video recordings providing us a view of the rail operators. All seven Rail Operators were not wearing a mask properly or not at all in the control room. See Figure 10 for sample screenshots.

Figure 10. Metro Rail Operators Improperly Wearing a Mask or Not Wearing a Mask



We assume this was because they were alone in a closed space not regularly interacting with customers, and they had their own window that they can open for ventilation.

However, we observed an operator not wearing a mask (Figure 11A) even when walking through the passenger portion of the train.

Figure 11A is the screenshot for video recording dated November 4, 2020, which showed a Rail Operator walked in without a mask or face covering.

Figure 11. Metro Rail Operator Entered Without a Mask



Passengers. In 14 out of the 17 rail videos, we observed at least one or multiple passengers not wearing a mask or not properly covering their nose and mouth. We noticed passengers boarded the rail car without masks. We also noted footage of passengers removing their masks.

Figure 12. Riders Improperly Wearing a Mask or Not Wearing a Mask



2. **Social Distancing.** Based on our sampled review of videos, we noted:

- a. **Video # 3 on Blue Line railcar.** Seats were almost filled; social distancing was not observed due to crowding. See Figure 13.

Figure 13: Social Distancing Not Observed



- b. **Video # 17 on Red Line railcar.** Incoming passengers did not wait for passengers to exit first; thus, passengers were crossing paths and not keeping a distance of six feet. See Figure 14.

Figure 14. Social Distancing Not Observed



3. **Railcar Ridership Level.** To determine the ridership level on the railcars, we divided the observed number of passengers with the seat capacity of the railcar model shown in Table 2. Table 5 is the summary of ridership level based on our sample review of videos.
- Six Rail cars were 0-10 percent full
 - Eleven Rail cars were 11-26.3 percent full

Table 5: Ridership Level in Railcar Sample

Number	Railcar #	Line	Route	Date	Time	Ridership Level
1	1089	Blue	Willow St to 7th & Metro	11/28/2020	8:30am	13.2%
2	1098	Blue	Willow St to 7th & Metro	11/28/2020	8:30am	7.9%
3	1122	Blue	San Pedro St to Willowbrook/Rosa Parks	11/30/2020	4:45pm	26.3%
4	159 A/B	Blue	San Pedro St to Willowbrook/Rosa Parks	11/30/2020	4:45pm	13.2%
5	1100	Blue	Willow St to 7th & Metro	11/7/2020	8:30am	19.7%
6	1063	Expo	Expo/Sepulveda to Downtown Santa Monica	11/30/2020	7:15am	6.6%
7	1046	Expo	Expo/Sepulveda to Downtown Santa Monica	12/10/2020	6:30am	13.2%
8	1046	Expo	Expo/Sepulveda to Downtown Santa Monica	12/11/2020	6:30pm	9.2%
9	1004	Expo	Expo Park/USC to 7th & Metro	11/28/2020	7:00pm	6.6%
10	1066	Expo	Expo/Sepulveda to Downtown Santa Monica	12/11/2020	7:00am	13.2%
11	1066	Expo	Expo/Sepulveda to Downtown Santa Monica	12/11/2020	7:00pm	9.2%
12	578	Red	7th & Metro to NH	11/4/2020	4:30pm	12.3%
13	536	Red	7th & Metro to NH	11/4/2020	4:30pm	8.8%
14	575	Red	7th & Metro to NH	11/4/2020	4:30pm	12.3%
15	565	Red	7th & Metro to NH	11/4/2020	4:30pm	12.3%
16	569	Red	Hollywood/Highland to Union Station	11/7/2020	8:15am	10.5%
17	596	Red	Hollywood/Highland to Union Station	11/7/2020	8:15am	17.5%

4. **Signage.** Because of the camera angle, quality of the video footage, and lack of zoom focus, we were unable to see whether there were signs inside the rail car requesting customers to wear masks or maintain a distance of six feet from each other. However, we were able to view the flashing monitor in front of the rail car advising riders that masks are required onboard.

III. Bus Audio Recordings/Radio Scanner Transportation Channel

We listened to a radio scanner transportation channel broadcasting the Metro Operations Center to document any audio comments relating to crowded buses, ventilation or mask conditions between December 14, 2020 to February 1, 2021. Examples of comments we heard include:

- A. December 14, 2020: Operator called the Bus Operations Control (BOC) because of a woman not wearing her mask on board. BOC notified the bus operator that calls about passengers not wearing masks should not be made to Bus Control as this issue is completely handled by Los Angeles Police Department (LAPD). However, BOC said they would contact LAPD to provide the operator's time points since she is requesting police assistance.
- B. December 14, 2020: Operator advised BOC that a passenger refused to wear mask. She gave her a mask but then later took it off.
- C. December 14, 2020: Operator advised BOC that she had to start passing up stops because every seat was filled and there were about eight to nine passengers standing.
- D. December 15, 2020: Operator advised BOC that he had to pass up passengers because he was "jammed packed at every door". The bus operator commented that they have to add another bus in between him and the bus ahead of him.
- E. December 15, 2020: Operator reported to BOC that he had passengers get off the bus because someone sneezed and he wanted to disinfect the bus. BOC advised him that he was not allowed to ask the passengers to get off the bus and delay stops just so he can disinfect the area.
- F. December 15, 2020: Operator asked BOC for assistance because she had a passenger who took off his mask to cough. The passenger was causing a problem on the bus and the operator wanted to talk to his supervisor.
- G. December 21, 2020: Operator informed BOC that there was an altercation among passengers when a man refused to wear a mask.
- H. February 1, 2021: Operator reported passenger was not wearing a mask; BOC then asked if they need to call LAPD.
- I. February 1, 2021: Operator reported to BOC that there was a young lady who refused to wear a mask and the former needed assistance. BOC asked the operator if the passenger was "creating a disturbance" because LAPD will not remove her simply for not wearing a mask. The Operator stated he needed LAPD.
- J. February 1, 2021: Operator referenced social distancing and reported that he left two people at a stop and then left seven people at another station. The operator mentioned he was trying to accommodate everyone but also expressed his concern with the virus.

- K. February 1, 2021: Operator asked BOC about the current protocol with the new mandate because she had a passenger not wearing a mask. BOC asked the operator if she was able to provide the passenger with a mask. The Operator gave her one.

The above audio recordings showed that Operators encountered passengers who refused to wear a mask. In some cases, Operators were able to assist and provided masks to passengers that did not have one. In addition, there were other instances reported to BOC when buses were full of passengers and some of them were not wearing masks; thus, social distancing was not observed.

CONCLUSION

Our review found that Metro generally complied with and has taken appropriate measures recommended and/or required by Centers for Disease Control and Prevention, State of California Physical Distancing Protocol, and Los Angeles County Social Distancing Protocol. Metro has been proactive in monitoring and adapting to evolving situations related to the COVID-19 pandemic.

The actions taken by Metro to address the COVID-19 pandemic have been numerous, consistent and on-going. Among others, Metro has issued the following key policies, procedures, measures, briefs, and updates to help reduce COVID-19 virus transmission since the pandemic was declared:

- Metro Public Health/Pandemic Plan for Infectious/Communicable Diseases
- Metro Digital COVID-19 Reporting System User Guide
- Metro USG HVAC System & COVID-19 Changes or Modifications
- Metro Digital COVID-19 Reporting System User Guide
- Metro Operations General Notice – Required Face Coverings
- Metro COVID-19 Daily Measures
- Metro General Order – Mask and Physical Distancing Requirements
- Metro COVID-19 Daily Brief to Employees
- Metro Weekly, Bi-Weekly, Monthly Updates on Response to COVID-19
- Metro Micro
- Metro Street Team

However, our review of sample bus and railcar video recordings found that notwithstanding Metro's efforts, there were instances of non-compliance with federal, state and local agencies recommendations for wearing facemasks and practicing social distancing by Metro staff and passengers that need to be addressed to ensure a healthy, safe and secure environment for the community and all Metro employees and its passengers.

RECOMMENDATIONS

We recommend:

Operations:

1. Continue to communicate with bus and rail operators to wear a mask and wear it properly.
2. Continue to educate and train bus and rail operators on how to handle situations when passengers do not comply with the federal, state, and local guidelines to reduce COVID-19 transmission. When passengers do not wear masks or observe social distance, Operators could make an announcement.
3. Create regular pre-made announcements to run every couple of minutes to reinforce the requirements of wearing a mask and observing social distance.
4. Review signage that could be placed in buses.
5. Continue to identify and evaluate cleaning methods to combat COVID-19 throughout bus and rail systems and facilities that yield maximum efficacy and ease of use.
6. Coordinate schedule and route of buses to testing and vaccination locations.
7. Continue to identify and apply effective technology for ventilation on Metro bus and rail systems, facilities, and in Gateway to combat the spread of COVID-19 virus.
8. Bus Operations Control should instruct operators to open doors for 20 seconds at each stop even if there is no passenger boarding, in order to effectuate the ventilation system that it designed to rely on obtaining fresh air in that way.
9. Consider other methods of increased ventilation such as converting a fixed close window to an opening window.
10. Authorize bus operators to stop accepting passengers when they reach their maximum passenger COVID-19 load and call it in to BOC so they might make other arrangements for patrons not permitted to board. Operators seem now confused if they are permitted to not accept overfull boarding.

System Security and Law Enforcement:

11. Direct transit security officers and fare inspectors to issue citations to riders who are warned to put on a mask, but refuse to comply without the assertion of medical condition that precludes wearing mask. This is based on the Metro Customer Code of Conduct which authorizes officers to cite for violations to follow authorized representatives' lawful orders including those based on the County's or City's executive orders.

Board Members:

12. Ensure executive orders issued by your municipalities are written to require that masks be worn before entering a public transit facility or vehicles rather than just “in” a facility or vehicles to minimize having to allow persons to enter before action can be taken.

Risk, Safety and Asset Management:

13. Continue to remind staff to comply with all measures implemented by Metro to reduce COVID-19 virus transmission.
14. Implement a policy requiring all employees to wear a mask in Metro’s in-person meetings in addition to social distancing and authorize management to send employees home who refuse to observe mask and social distancing rules after being warned to do so.
15. Consider installation of Personal Protective Equipment (PPE) vending machines for the sale of face masks and hand sanitizers in Metro facilities, stations, and vehicles. Our limited research found that there are vendors who can deliver PPE vending machines within a few weeks after the order is placed.

In early 2020, the OIG issued a report on the use of PPE at Metro Divisions that offered several recommendations to Metro Operations similar in nature to the recommendations in this report to protect Metro employees from the transmission of the COVID-19 virus. The recommendations largely focused on reiterating the importance of complying with local government and agency directives to use PPE including: wear a mask, practice social distance, clean and wipe shared surfaces before and after use, and use hand sanitizer when entering shared areas.

MANAGEMENT COMMENTS TO RECOMMENDATIONS

On February 17, 2021, we provided Metro Management a draft report. On February 25, 2021, the management completed their responses that summarized their corrective actions, as shown in Attachment A.

The offices of Metro Board chairpersons were contacted and they are agreeable with our report recommendations.

OIG EVALUATION OF MANAGEMENT RESPONSE

Metro Management’s responses and corrective actions taken are responsive to the findings and recommendations in the report. Therefore, we consider all issues related to the recommendations resolved and closed based on the corrective actions taken.

**Metro****Interoffice Memo**

Date	February 24, 2021
To	Yvonne Zheng, Senior Manager, Audit Officer of the Inspector General
From	Bob Green, Chief <i>BG</i> System Security & Law Enforcement
Subject	Response to OIG Draft Report: Review of Metro Measures to Reduce COVID-19 Transmission Report No. 21-AUD-05
Copies	Aston T. Greene, E. O./Deputy Chief System Security & Law Enforcement

On behalf of the System Security and Law Enforcement (SSLE) Department, this memo serves to address and respond to the recommendation in the OIG Draft Report: Review of Metro Measures to Reduce COVID-19 Transmission Report No. 21-AUD-05.

SSLE management accepts the recommendation (#11) as follows:

Direct transit security officers and fare inspectors to issue citations to riders who are warned to put on a mask but refuse to comply without the assertion of [a] medical condition that precludes wearing [a] mask. This is based on the Metro Customer Code of Conduct which authorizes officers to cite for violations to follow authorized representatives' lawful orders, including those based on the County's or City's executive orders. (pg. 27)

Action Plan/Response:

Metro SSLE has directed Metro Security to take this action. Further, in lieu of the TSA Security Directive 1582/84-21-01 issued on January 31, 2021, SSLE generated a policy for criminal trespass removal based on calls/notifications from the ROC/BOC about mask non-compliance. Patrons will be escorted off a conveyance so that service can resume, then issued a citation and possible expulsion from the system if non-compliance continues, without an ADA exception.

The Board Box Memo [see attached] transmitted by the CEO to the Board reaffirms this policy as remaining in effect as of February 15, 2021.

Management Response to Draft Report
Office of the Inspector General

Report No. 21-AUD-05

ATTACHMENT TO SSLE RESPONSE**Metro**

Los Angeles County
Metropolitan Transportation Authority

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FEBRUARY 15, 2021

TO: BOARD OF DIRECTORS

FROM: PHILLIP A. WASHINGTON *PAW*
CHIEF EXECUTIVE OFFICER

**SUBJECT: METRO RESPONSE TO TSA TRANSPORTATION MASK
DIRECTIVE AND BOARD MOTION 52: FACE COVERINGS
REQUIRED ON METRO BUSES AND TRAINS**

ISSUE

This Board box describes Metro staff's response to the January 31, 2021 TSA Security Directive 1582/84-21-01: Security Measures – Face Mask Requirements and Board Motion 52: Face Coverings Required on Metro Buses and Trains by Directors Hahn, Butts, Mitchell, Barger, and Solis.

BACKGROUND

At the January 28, 2021 Board meeting, Directors Hahn, Butts, Mitchell, Barger, and Solis issued Motion 52 directing the Chief Executive Officer to:

- A. Reiterate for both the public and staff that face coverings are mandatory
- B. Report back in 14 days on the following:
 - a. Recommendations on how to strengthen efforts to ensure compliance with mandatory face coverings, including but not limited to fines
 - b. Recommendations for alternative transportation options for patrons instructed not to wear a face covering by a medical provider

On January 31, 2021, the Transportation Security Administration (TSA) issued Security Directive (SD) 1582/84-21-01: Security Measures – Face Mask Requirements in response to the President's Executive Order of January 21, 2021 and the subsequent Centers for Disease Control and Prevention (CDC) Order on January 29, 2021 mandating masks while on conveyances and at transportation hubs.

The TSA SD requires that individuals wear masks on board public transportation or in public areas of transportation hubs or facilities, with a few exceptions (as applicable on transit) as follows:

Management Response to Draft Report
Office of the Inspector General

Report No. 21-AUD-05

1. When necessary for identity verification
2. While eating or drinking for brief periods
3. When the ability to see the mouth is essential for communication
4. If incapacitated or otherwise unable to remove a mask without assistance
5. In private vehicles for personal use
6. Children under the age of 2
7. People with disabilities who cannot wear a mask safely as defined in the Americans with Disabilities Act

The TSA has also directed agencies to establish procedures to manage situations with persons who refuse to comply with the requirement to wear a mask. At a minimum these procedures must ensure that, if an individual refuses to comply with an instruction given by the owner/operator with respect to wearing a mask, the owner/operator must:

1. Deny boarding, or
2. Make best efforts to disembark or remove the individual from the facility as soon as practicable.

DISCUSSION

To respond to the TSA SD and Motion 52, Metro has addressed messaging, procedures for unmasked passengers with and without medical exemptions, and alternative transportation options.

Metro has required masks from the beginning of the pandemic. To date, we have achieved about 99% compliance on our system. Staff acknowledges the intent of the TSA SD and Motion 52. The TSA has explicitly directed that agencies are to make their best efforts to comply with the SD.

Staff are taking the following actions to comply with the TSA SD and Motion 52.

- Vehicle and station signage, as well as automated announcements, are currently being refreshed to remind passengers of the mask requirement.
- Communications is redeploying Street Teams beginning February 22 and plans to distribute 50,000 packages containing masks, travel tips and hand sanitizer.
- Operations is researching possibilities for installing mask dispensers on buses and in rail stations to increase availability of masks for passengers.

Staff have been directed to use the following procedures when encountering unmasked passengers on the system:

- Operators will allow boarding of all passengers at bus stops and stations.
- Any unmasked passenger will be requested to wear a mask.

Management Response to Draft Report
Office of the Inspector General

Report No. 21-AUD-05

- If an unmasked passenger does not voluntarily comply with the mask requirement, the operator will notify the Bus or Rail Operations Center to request a security response.
- Security officers will seek voluntary compliance and offer a mask to an unmasked passenger.
- If a passenger does not comply, officers may take steps to remove the passenger using existing protocols for violations, beginning with a warning and followed by a fine, as necessary. Under Metro's existing Code of Conduct, officers may issue a fine of \$75 (\$40 for minors) per offense for a customer's failure to obey a sign intended to provide for safety of passengers.

Unmasked Passengers with Medical Exemption

Unless an unmasked passenger voluntarily offers proof of a medical exemption, operators have no way of knowing if the passenger qualifies for exemption under the TSA SD. For this reason, as stated above, operators have been directed to allow boarding of all passengers at bus stops and stations.

Due to the private nature of medical conditions and the associated disproportionate burden imposed if asking an individual to disclose his/her/their condition, operators have been directed not to ask an unmasked passenger for proof of medical exemption.

If an unmasked passenger voluntarily offers a medical exemption he/she/they will not be cited, fined, or removed.

Alternative Transportation Options for Unmasked Passengers with Medical Exemption

Per Motion 52, Metro has researched potential options to provide alternate transportation for unmasked passengers with medical exemptions. In order to provide alternatives, such options must be practical for passengers, relative to taking Metro buses or trains.

Metro's research indicates that potential alternative transportation options, such as transportation network companies or taxis, also require passengers to wear masks while on board. It is unclear whether unmasked passengers with medical exemptions are allowed to ride with the transportation network companies or taxis.

The TSA SD, which was issued since the passage of Motion 52, allows Metro to carry unmasked passengers with medical exemptions. Because it is a federal mandate, the TSA SD governs Metro's actions under these conditions.

NEXT STEPS

In addition to responding to the TSA SD, Metro is assisting the LA County in expanding access to vaccinations through the following activities:

Management Response to Draft Report
Office of the Inspector General **Report No. 21-AUD-05**

- Staff are exploring the possibility of offering Metro park-and-ride locations as vaccination sites.
- Staff are also exploring the logistics and costs to transport people to vaccination sites per Board Motion 11.1, Part F (see attached), approved at the January 28, 2021 Board meeting.

For more information or if you have questions, please contact me directly at 213.922.7555 or our Chief of Staff, Nadine Lee, at 213-922-7950.

Management Response to Draft Report
Office of the Inspector General

Report No. 21-AUD-05



Metro

Interoffice Memo

Date	February 24, 2021
To	Karen Gorman Inspector General
From	James T. Gallagher Chief Operations Officer <i>JTG</i>
Subject	Management Response to the Audit of Metro Measures to Reduce COVID-19 Transmission (21-AUD-05)

Operations Management received and reviewed the Audit of Metro Measures to Reduce COVID-19 Transmission. Operations, in coordination with the Corporate Safety and Communications, has begun the process to review and implement change recommendations to more effectively reduce the spread of COVID-19 transmission and increase awareness of the federal mask regulation implemented on.

The report includes the following recommendations for Operations:

1. Continue to communicate with bus and rail operators to wear a mask and wear it properly.

Response: Agree; Operations will continue to communicate with bus and rail operators to wear a mask and wear it properly.

2. Continue to educate and train bus and rail operators on how to handle situations when passengers do not comply with the federal, state, and local guidelines to reduce COVID-19 transmission. When passengers do not wear masks or observe social distance, Operators could make an announcement.

Response: Agree; Operations will continue to educate and train bus/rail operators on how to handle situations when passengers do not comply with the federal, state and location guidelines to reduce COVID-19 transmission. Please note that a revised mask order was sent out on Friday, February 19, 2021 explaining the process for reporting and handling non-mask compliance. See attachment A. Also, mask dispensers have been procured and will be installed in our bus/rail vehicles, and at our rail stations in support of the federal mask order.

3. Create regular pre-made announcements to run every couple of minutes to reinforce the requirements of wearing a mask and observing social distance.

Response: Agree; Operations and Communication are working on the attached revised mask announcements that will be played on buses, trains and at stations. See attachment B.

4. Review signage that could be placed in buses.

Response: Agree; Operations and Communications have updated our signage on vehicles and at stations to match the federal mask order requirement. See attachment C.

5. Continue to identify and evaluate cleaning methods to combat COVID-19 throughout bus and rail systems and facilities that yield maximum efficacy and ease of use.

Management Response to Draft Report

Office of the Inspector General

Report No. 21-AUD-05

Response: Agree; Operations will continue to evaluate and identify cleaning methods to combat COVID-19 throughout our network and at our operating facilities and locations. In addition, we have established a COVID-19 task force, comprised of various departments at Metro, to find solutions to combat the spread of COVID-19 on Metro's bus and rail systems, facilities, and Gateway. More details about this taskforce are found in the recommendation #7 response.

6. Coordinate schedule and route of buses to testing and vaccination locations.

Response: Operations has identified the Metro as well as municipal operator services to the County mega vaccinations sites and City of LA's Dodgers Stadium site. We are also looking into how MetroMicro can be set up to provide service to vaccination sites within the Metro Micro zones. We are currently coordinating with Los Angeles County to evaluate whether it would be feasible and beneficial to have Fulgent testing sites on or near our stations.

7. Continue to identify and apply effective technology for ventilation on Metro bus and rail systems, facilities, and in Gateway to combat the spread of COVID-19 virus.

Response: Agree; Operations will continue to identify the efficacy of available technology relative to ventilation on Metro bus and rail systems, and facilities to combat the spread of COVID-19. Metro's COVID-19 task force, comprised of various departments at Metro, was formed to find solutions to combat the spread of COVID-19 on Metro's bus and rail systems, facilities, and Gateway. Among the potential solutions evaluated were Ultraviolet-C (UV-C) radiation (e.g. pulsed xenon, LED, mercury, in-duct HVAC, escalator handrail units, etc.), chemical surface disinfectants, air purification and filtration systems (e.g. ionization, electrostatic, copper embedded, higher MERV ratings, etc.), and applied disinfection films (e.g. copper films). All technologies were/are being evaluated based on their efficacy against SARS-CoV-2 (the virus that causes COVID-19), residual efficacy after application, ease of use, long term effects, and quality. Some technologies were and are currently being independently tested by the EPA for viricidal efficacy verification. To date, the most promising solutions have shown to be chemical surface disinfectants and air purification and filtration systems. Current efforts are focused on increasing ventilation and air filtration. Additional studies continue with UV-C technologies, air filtration, copper coatings, aerosol behavior, etc.

8. Bus Operations Control should instruct operators to open doors for 20 seconds at each stop even if there is no passenger boarding, in order to effectuate the ventilation system that it designed to rely on obtaining fresh air in that way.

Response: Operations appreciates the recommendation, however after review of our HVAC equipment/systems on our vehicles, we have determined that they are properly functioning and coupled with our enhanced cleaning protocols and revised General Mask order protocols, these efforts combined, will reduce the spread of COVID-19 on our system.

9. Consider other methods of increased ventilation such as converting a fixed close window to an opening window.

Response: Operations will consider available methods of increased ventilation. As mentioned previously, our Metro's COVID-19 task force is evaluating air purification and filtration systems (e.g. ionization, electrostatic, copper embedded, higher MERV ratings, etc.). All technologies were/are being evaluated based on their efficacy against SARS-CoV-2, residual efficacy after

Management Response to Draft Report
Office of the Inspector General **Report No. 21-AUD-05**

application, ease of use, long term effects, safety and quality. Additional studies continue with UV-C technologies, air filtration, copper coatings, aerosol behavior, etc.

10. Authorize bus operators to stop accepting passengers when they reach their maximum passenger COVID-19 load and call it in to BOC so they might make other arrangements for patrons not permitted to board. Operators seem now confused if they are permitted to not accept overfull boarding.

Response: Operations will consider a formal authorization for bus operators to stop allowing customers to board when the passenger load makes it impossible to allow minimum 6 foot spacing. Any instance of passing up customers must be reported immediately to BOC. Please note, however, that a bus operator has the discretion to decide not board additional customers if the safety of themselves and customers is at risk.

CC: Ken Hernandez, Chief Risk, Safety & Asset Management Officer
Yvette Rapose, Chief Communications Officer
Diane Frazier, Interim SEO, Transportation
Bernard Jackson, SEO, Rail Transportation
Errol Taylor, SEO, Maintenance & Engineering
Conan Cheung, SEO, Scheduling & Service Development
Jesus Montes, Sr. EO, Vehicle Engineering & Acquisition
Diane Corral-Lopez, EO, Operations Administration
Nancy Alberto-Saravia, Director, Finance & Administration

NOTE:

Metro Operations submitted ‘Operations General Notice #21-003’ dated February 19, 2021 and several examples of COVID-19 related signage placed throughout the Metro system including buses and rail stations to implement the revised Transportation Security Administration (TSA) directive.

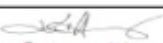
Management Response to Draft Report
Office of the Inspector General

Report No. 21-AUD-05



Metro

Interoffice Memo

Date	February 25, 2021
To	Karen Gorman Inspector General
From	Ken Hernandez  Chief Risk, Safety & Asset Management Officer
Subject	Response to OIG Draft Report No. 21-AUD-05

This memo is management's response to the Risk, Safety and Asset Management department recommendations in the OIG draft report titled *Review of Metro Measures to Reduce COVID-19 Transmission*, Report No. 21-AID-05.

The report includes the following recommendations for Risk, Safety and Asset Management:

Recommendation #13 – Continue to remind staff to comply with all measures implemented by Metro to reduce COVID-19 virus transmission.

Response: Metro communicates and will continue to communicate information and reminders about COVID-19 hazards and Metro's COVID-19 policies and procedures to employees and to other employers, persons, and entities within or in contact with the workplace through posters at work locations; agency wide email notifications and other informational materials on Metro's Intranet site; and notifications on Metro's public website metro.net as stated in Metro's COVID-19 Prevention Program (CPP) document. Metro's CPP can be accessed via this link: [Metro COVID-19 Prevention Program \(CPP\)](#).

Recommendation #14 – Implement a policy requiring all employees to wear a mask in Metro's in-person meetings in addition to social distancing and authorize management to send employees home who refuse to observe mask and social distancing rules after being warned to do so.

Response: Risk, Safety and Asset Management staff will work in collaboration with Operations, Communications, Human Capital & Development, County Counsel, Metro's Policy Office and other SLT stakeholders to determine the feasibility of creating and implementing policy requiring all employees to wear a face mask and social distance during in-person meetings; including looking at potential disciplinary actions for refusal.

Recommendation #15 – Consider installation of Personal Protective Equipment (PPE) vending machines for the sale of face masks and hand sanitizers in Metro facilities, stations, and vehicles. Our limited research found that there are vendors who can deliver PPE vending machines within a few weeks after the order is placed.

Management Response to Draft Report
Office of the Inspector General

Report No. 21-AUD-05

Response: Metro has considered the installation of PPE equipment on our system. In March - April 2020, Operations installed over 85 hand sanitizer dispensers across our stations and operating facilities and location. These dispensers are inspected three times daily and replenished with hand sanitizer as needed. Attached is the list of the hand sanitizer dispenser locations. Additionally, with the support of Vendor Contract Management and Corporate Safety, Operations issued a procurement on February 19, 2021 for 2,200 acrylic mask dispensers (with decals) and 220,000 disposable masks (approximately 100 masks per dispenser). These mask dispensers will be delivered in early March 2021 and installed on our fleet and stations for immediate use by our customers. Specifically, all mask dispensers will go through our Logistics team for distribution and installation will be completed by Metro personnel on Metro vehicles and stations. Attached are pictures of the mask dispenser design (Attachment A) and fleet installation locations (Attachment B). Lastly, in terms of PPE for employees, personal hand sanitizers, masks, and gloves are readily available in inventory. The running PPE total to date is over 3,092,774 pairs of gloves, over 1,420,521 masks, and over 138,984 hand sanitizers that have been distributed to field locations.

CC: James Gallagher, Chief Operations Officer
Yvette Rapose, Chief Communications Officer
Elba Higueros, Chief Policy Officer
Vijay Khawani, Executive Officer, Corporate Safety
Raymond Lopez, Deputy Executive Officer, Corporate Safety
Collins Kalu, Sr. Director, Safety Certification and Operations Mgmt.

NOTE:

Risk, Safety and Asset Management submitted several pictures of mask dispensers across Metro stations and operating facilities, and a list of locations where hand sanitizer dispensers were installed.

Centers for Disease Control and Prevention (CDC) provides the following guidelines for social distancing when taking public transit:



Public transit

Follow the [general principles listed above](#), plus the following

Stay up-to-date

- Check with local transit authorities for the latest information on changes to services and procedures, especially if you might need additional assistance.

Avoid touching surfaces

- As much as possible, limit touching frequently touched surfaces such as kiosks, digital interfaces such as touchscreens and fingerprint scanners, ticket machines, turnstiles, handrails, restroom surfaces, elevator buttons, and benches as much as possible.
 - If you must touch these surfaces, as soon as you can, wash your hands for 20 seconds with soap and water or rub your hands with sanitizer containing 60% alcohol.
- Use touchless payment and no-touch trash cans and doors when available. Exchange cash or credit cards by placing them in a receipt tray or on the counter rather than by hand, if possible.

Social distance

- When possible, consider traveling during non-peak hours when there are likely to be fewer people.
- Follow social distancing guidelines by staying at least 6 feet (2 meters) from people who are not from your household. For example:
 - Avoid gathering in groups, and stay out of crowded spaces when possible, especially at transit stations and stops.
 - Consider skipping a row of seats between yourself and other riders if possible.
 - Enter and exit buses through rear entry doors if possible.
 - Look for social distancing instructions or physical guides offered by transit authorities (for example, floor decals or signs indicating where to stand or sit to remain at least 6 feet apart from others).

Practice hand hygiene

- After you leave the transit station or stop, use hand sanitizer containing at least 60% alcohol.
- When you arrive at your destination, [wash your hands](#) with soap and water for at least 20 seconds.

California Physical Distancing Protocol

Office of the Inspector General

Report No. 21-AUD-05

State of California published Physical Distancing Protocol, which indicates, “Businesses must implement all applicable measures listed below and be prepared to explain why any measure that is not implemented is not applicable to the business.” The measures include:

- A. Signage
- B. Measures to Protect Employee Health
- C. Measures to Prevent Crowds from Gathering
- D. Measures to Keep people at Least Six Feet Apart
- E. Measures to Prevent Unnecessary Contact
- F. Measures to Increase Sanitization

(Please see next page.)

Appendix A: Physical Distancing Protocol

Business Name: Facility Address: Approximate gross square footage of space open to the public: ft²

Businesses must implement all applicable measures listed below and be prepared to explain why any measure that is not implemented is not applicable to the business.

When completing this form, mark all checkboxes applicable to the facility.

Signage

- ☐ Place a sign at each public entrance of the facility to inform all employees and customers that they should: avoid entering the facility if they have a cough or fever; maintain a minimum six-foot distance from one another; sneeze and cough into a cloth or tissue or, if not available, into one's elbow; not shake hands or engage in any unnecessary physical contact, and wear a face covering.
- ☐ Post a copy of this Physical Distancing Protocol at each public entrance to the facility.

Measures to Protect Employee Health

- ☐ Everyone who can carry out their work duties from home has been directed to do so.
- ☐ All employees have been told not to come to work if sick.
- ☐ Symptom checks are being conducted before employees may enter the work space.
- ☐ All desks or individual work stations are separated by at least six feet.
- ☐ Break rooms, bathrooms, and other common areas are being disinfected frequently, on the following schedule:
 - ☐ Break rooms:
 - ☐ Bathrooms:
 - ☐ Other:
- ☐ Disinfectant and related supplies are available to all employees at the following location(s):
- ☐ Hand sanitizer effective against COVID-19 is available to all employees at the following location(s):

- ☐ Soap and water are available to all employees at the following location(s):

- ☐ Encourage employees and customers to wear a face covering that covers the nose and mouth at all times when in the facility. Provide such face coverings to employees if needed.

- ☐ Copies of this Protocol have been distributed to all employees.

- ☐ Optional—Describe other measures:

Measures to Prevent Crowds from Gathering

- ☐ Limit the number of customers in the facility at any one time to [insert maximum number here], which allows for customers and employees to easily maintain at least six-foot distance from one another at all practicable times.

- ☐ Post an employee at the door to ensure that the maximum number of customers in the facility set forth above is not exceeded.

- ☐ Placing per-person limits on goods that are selling out quickly to reduce crowds and lines. Explain:

- ☐ Optional—Describe other measures:

Measures to Keep People at Least Six Feet Apart

- ☐ Placing signs outside the store reminding people to be at least six feet apart, including when in line.

- ☐ Placing tape or other markings at least six feet apart in customer line areas inside the facility and on sidewalks at public entrances with signs directing customers to use the markings to maintain distance.

- ☐ Separate order areas from delivery areas to prevent customers from gathering.

- ☐ All employees have been instructed to maintain at least six feet distance from customers and from each other, except employees may momentarily come closer when necessary to accept payment, deliver goods or services, or as otherwise necessary.

- ☐ Optional—Describe other measures:

Measures to Prevent Unnecessary Contact

- ☐ Preventing people from self-serving any items that are food-related.
 - ☐ Lids for cups and food-bar type items are provided by staff and not available for self-service.
 - ☐ Bulk-item food bins are not available for customer self-service use.
 - ☐ Not permitting customers to bring their own bags, mugs, or other reusable items.
 - ☐ Providing for contactless payment systems or, if not feasible, sanitizing payment systems regularly. Describe:
 - ☐ Optional—Describe other measures (e.g., providing senior-only hours):
-

Measures to Increase Sanitization

- ☐ Disinfecting wipes that are effective against COVID-19 are available near shopping carts and shopping baskets.
- ☐ Employee(s) assigned to disinfect carts and baskets regularly.
- ☐ Hand sanitizer, soap and water, or effective disinfectant is available to the public at or near the entrance of the facility, at checkout counters, and anywhere else inside the store or immediately outside where people have direct interactions.
- ☐ Disinfecting all payment portals, pens, and styluses after each use.
- ☐ Disinfecting all high-contact surfaces frequently.
- ☐ Optional—Describe other measures:

* Any additional measures not included here should be listed on separate pages, which the business should attach to this document.

You may contact the following person with any questions or comments about this Protocol:

CONTACT NAME:

CONTACT PHONE:

Los Angeles County Protocol for Social Distancing has similar measures as State of California Physical Distancing Protocol, which covers the following measures:

- A) Signage
- B) Measures to Protect Employee Health
- C) Measures to Prevent Crowds from Gathering
- D) Measures to Keep people at Least Six Feet Apart
- E) Measures to Present Unnecessary Contact
- F) **Measures to Promote Infection Control** (State Protocol does not have these measures)
- G) Measures to Increase Sanitization

(See next page.)

COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC HEALTH
ORDER OF THE HEALTH OFFICER



Protocol for Social Distancing: Appendix A

Recent Updates:

10/5/20: Clarification added that visitor assessments should also include whether they are currently required to be under isolation or quarantine.

Business name: _____

Facility Address: _____

**Approximate gross square footage
of space open to the public:** _____

Businesses must implement all applicable measures listed below and be prepared to explain why any measure that is not implemented is inapplicable to the business.

A. SIGNAGE

- ☐ Signage posting a copy of the Social Distancing Protocol at each public entrance to the facility.

B. MEASURES TO PROTECT EMPLOYEE HEALTH (CHECK ALL THAT APPLY TO THE FACILITY)

- ☐ Everyone who can carry out their work duties from home has been directed to do so.
- ☐ All employees have been told not to come to work if sick.
- ☐ Upon being informed that one or more employees test positive for, or has symptoms consistent with COVID-19 (case), the employer has a plan or protocol in place to have the case(s) isolate themselves at home and require the immediate self-quarantine of all employees that had a workplace exposure to the case(s). The employer's plan should consider a protocol for all quarantined employees to have access to or be tested for COVID-19 in order to determine whether there have been additional workplace exposures, which may require additional COVID-19 control measures.
- ☐ Employee screenings are conducted before employees may enter the workspace. Checks must include a check-in concerning cough, shortness of breath, difficulty breathing and fever or chills and if the employee has had contact with a person known to be infected COVID-19 in the last 14 days. These checks can be done remotely or in person upon the employees' arrival. A temperature check should also be done at the worksite if feasible.
- ☐ In the event that 3 or more cases are identified within the workplace within a span of 14 days the employer should report this cluster to the Department of Public Health at (888) 397-3993 or (213) 240-7821. If a cluster is identified at a worksite, the Department of Public Health will initiate a cluster response which includes providing infection control guidance and recommendations, technical support and site-specific control measures. A public health case manager will be assigned to the cluster investigation to help guide the facility response.
- ☐ Employees who have contact with others are offered, at no cost, an appropriate face covering that covers the nose and mouth. The covering is to be worn by the employee at all times during the workday when in contact or likely to come into contact with others. Employees who have been instructed by their medical provider that they should not wear a face covering should wear a face shield with a drape on the bottom edge, to be in compliance with State directives, as long as their condition permits it. A drape that is form fitting under the chin is preferred. Masks with one-way valves should not be used. Employees need not wear a face covering when the employee is alone in a private office or a cubicle with a solid partition that exceeds the height of the employee when standing.

Los Angeles County Protocol for Social Distancing
Office of the Inspector General

Report No. 21-AUD-05

COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC HEALTH
ORDER OF THE HEALTH OFFICER



- ☐ Employees are instructed to wash or replace their face coverings daily.
- ☐ All desks or individual workstations are separated by at least six feet.
- ☐ Break rooms, restrooms, and other common areas are being disinfected frequently, on the following schedule:
 - ☐ Break rooms: _____
 - ☐ Restrooms: _____
 - ☐ Other: _____
- ☐ Disinfectant and related supplies are available to all employees at the following location(s): _____
- ☐ Hand sanitizer effective against COVID-19 is available to all employees at the following location(s): _____
- ☐ Soap and water are available to all employees at the following location(s): _____
- ☐ Employees are allowed frequent breaks to wash their hands.
- ☐ Copies of this Protocol have been distributed to all employees.
- ☐ Optional—Describe other measures: _____

C. MEASURES TO PREVENT CROWDS FROM GATHERING
(CHECK ALL THAT APPLY TO THE FACILITY)

- ☐ Limit the number of customers in the store at any one time, which allows for customers and employees to easily maintain at least six-foot distance from one another at all practicable times.
 Maximum number of customers in the facility: _____
- ☐ _____
- ☐ Post an employee at the door to ensure the maximum number of customers in the facility is not exceeded.
- ☐ Placing per-person limits on goods that are selling out quickly to reduce crowds and lines. Explain: _____
- ☐ Optional-Describe other measures: _____

D. MEASURES TO KEEP PEOPLE AT LEAST SIX FEET APART
(CHECK ALL THAT APPLY TO THE FACILITY)

- ☐ Placing signs outside the store reminding people to be at least six feet apart, including when in line.
- ☐ Placing tape or other markings at least six feet apart in customer line areas inside the store and on walkways at public entrances with signs directing customers to use the markings to maintain distance.

COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC HEALTH
ORDER OF THE HEALTH OFFICER



- ☐ Separate order areas from delivery areas to prevent customers from gathering.
- ☐ All employees have been instructed to maintain at least six feet distance from customers and from each other, except employees may momentarily come closer when necessary to accept payment, deliver goods or services, or as otherwise necessary.
- ☐ Optional—Institute one-way aisles to facilitate Social Distancing.
- ☐ Optional—Describe other measures:

E. MEASURES TO PREVENT UNNECESSARY CONTACT (CHECK ALL THAT APPLY TO THE FACILITY)

- ☐ Preventing people from self-serving any items that are food-related.
 - ☐ All items are pre-packaged in sealed containers by staff.
 - ☐ Bulk-item food bins are not available for customer self-service use.
 - ☐ Food samples are prohibited.
- ☐ Providing for contactless payment systems or, if not feasible, sanitizing payment systems regularly.
Describe:
- ☐ Optional-Describe other measures (e.g. providing senior-only hours):

F. MEASURES TO PROMOTE INFECTION CONTROL

- ☐ Visitors arriving at the establishment are reminded to wear a face covering at all times (except while eating or drinking, if applicable) while in the establishment or on the grounds of the establishment. This applies to all adults and to children 2 years of age and older. Only individuals who have been instructed not to wear a face covering by their medical provider are exempt from wearing one. To support the safety of your employees and other visitors, a face covering should be made available to visitors who arrive without them.
- ☐ Symptom checks are conducted before visitors may enter the facility. Checks must include a check-in concerning cough, shortness of breath, difficulty breathing, fever or chills and whether the individual is currently under isolation or quarantine orders. These checks can be done in person or through alternative methods such as on-line check in systems or through signage posted at the entrance to the facility stating that visitors with these symptoms should not enter the premises.

G. MEASURES TO INCREASE SANITIZATION (CHECK ALL THAT APPLY TO THE FACILITY)

- ☐ Restrooms normally open to the public shall remain open to the public.
- ☐ Disinfecting wipes that are effective against COVID-19 are available near shopping carts and shopping baskets.
- ☐ Employee(s) assigned to disinfect carts and baskets frequently, preferably after each use.
- ☐ Hand sanitizer, soap and water, or effective disinfectant is available to the public at or near the entrance of the facility, at checkout counters, and anywhere else inside the store or immediately outside where people have direct interactions.
- ☐ Disinfecting all payment portals, pens, and styluses after each use.
- ☐ Disinfecting all high-contact surfaces frequently.

Los Angeles County Protocol for Social Distancing
Office of the Inspector General

Report No. 21-AUD-05

COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC HEALTH
ORDER OF THE HEALTH OFFICER



☐ Optional- Describe other measures:

**Any additional measures not included above should be listed on separate pages,
which the business should attach to this document.**

**You may contact the following person with any
questions or comments about this protocol:**

**Business
Contact Name:**

Phone number:

**Date Last
Revised:**

LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

RISK, SAFETY & ASSET MANAGEMENT



FINAL

**METRO PUBLIC HEALTH/PANDEMIC PLAN FOR
INFECTIOUS/COMMUNICABLE DISEASES**

March 2020

Metro Public Health/Pandemic Plan for Infectious/Communicable Diseases
(Selected Pages)

Office of the Inspector General

Report No. 21-AUD-05

Metro Corporate Safety, in collaboration with Human Capital & Development, Emergency Preparedness and other departments, has developed a Public Health/Pandemic Plan to prepare the agency for dealing with the effect of a health pandemic, communicable and other reportable diseases. These include: Measles, H1N1, Meningitis, Legionnaires, Tuberculosis, Mumps, Whooping Cough, Viral Hemorrhagic Fevers (Ebola), and Coronavirus (COVID-19). A pandemic is characterized by widespread human to human transmission of a virus, on a global scale. While no one can predict the severity of a pandemic, the Pandemic of 1918 is widely believed to have taken roughly 50 million lives worldwide, underscoring the need for proper planning.

A pandemic will likely alter many business functions due to several factors including but not limited to employee absenteeism, shortage of supplies, health department restrictions on public gatherings, and reduced ridership. Since each pandemic is unique, these generic guidelines should be tailored to the situation at hand in coordination.

The World Health Organization (WHO) tracks the worldwide progress of viral outbreaks that may expand to a pandemic. Metro will be guided in its preparations for a pandemic based upon the threat level identified by the WHO. Other agencies such as the Centers for Disease Control and Prevention (CDC) and state and local health agencies will be instrumental in providing guidance. In Los Angeles County, the Public Health Department has responsibility for health issues and has the authority to implement public activity restrictions if needed. Metro will coordinate with Public Health to identify and confirm appropriate actions to help protect employees and the riding public.

The guideline for responding to pandemic outbreak shall be implemented under the principles of the National Incident Management System (NIMS) and Standardized Emergency Management System (SEMS). Metro intends to and conducts all emergency operations and responses in a manner consistent with NIMS and SEMS.

For other communicable diseases such as Measles, Meningitis, Mumps, Whooping Cough, Tuberculosis, Legionellosis and Ebola, Metro's Standard Operating Procedures (SOP) for Responding to Reportable cases of Certain Infectious Diseases shall be followed. See Appendix F.

In addition, Metro is cognizant of the challenges posed by infectious diseases. Guidance is provided in Appendix G for dealing with public health issues concerning infectious diseases such as COVID-19.

Each department has the responsibility to follow, as outlined, this Public Health Plan. The Plan is consistent with Metro's policy to provide a safe and healthy working environment for employees and a safe transit system for the public.

Appendix E

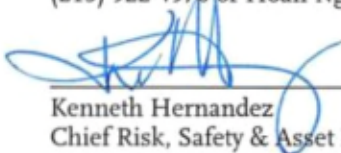
Metro Public Health/Pandemic Plan for Infectious/Communicable Diseases
(Selected Pages)

Office of the Inspector General

Report No. 21-AUD-05

This document will be maintained by Corporate Safety and updated when conditions warrant such changes.

If you have any questions or need additional information regarding this plan, please contact Collins Kalu, Sr. Director, Safety Certifications & Operations Management at (213) 922-4970 or Hoan Nguyen, Principal Safety Specialist at (213) 922-4915.


Kenneth Hernandez
Chief Risk, Safety & Asset Management Officer

3/20/2020
Date


Joanne Peterson
Chief Human Capital & Development Officer

3/20/20
Date

TABLE OF CONTENTS

1. INTRODUCTION	1
2. POLICY	2
3. PLANNING ASSUMPTIONS	2
4. BUSINESS CONTINUITY PLANNING FOR A PANDEMIC	3
Talent Management/Payroll/Labor Relations Issues	4
Employees/Public Health Protection Measures	4
Seasonal Influenza Vaccination/Vaccinations/Anti-virals	4
Personal Hygiene	4
Disinfections of Facilities and Vehicles	5
Restrict Workplace Entry of People with Influenza Symptoms	6
Increase Social Distancing	6
Manage Staff Who Become Ill at Work	7
Personal Protective Equipment	7
Food Handling	7
Maintain Essential Business Activities	8
Communication/Education	9
5. SERVICE DELIVERY PLAN – BOC and ROC CO-LEADS	9
6. RESPONSIBILITIES	10
Human Resources	10
Department Management	10
Employees	10
Procurement Department	10
Information Technology Services Department	10
Risk, Safety and Asset Management Department	11
APPENDIX A – WHO PANDEMIC PHASES	12
APPENDIX B – HUMAN MANAGEMENT POLICIES	15
APPENDIX C – PERSONAL HYGIENE	18
APPENDIX D – NOTICES	21
APPENDIX E – SCREENING FLOWCHARTS	24
APPENDIX F – SOP – CERTAIN INFECTIOUS DISEASES	28
APPENDIX G – PROTECTION AGAINST COVID-19	32

1. INTRODUCTION

According to the World Health Organization (WHO), "An influenza pandemic occurs when a new influenza virus appears against which the human population has no immunity, resulting in several simultaneous epidemics worldwide with enormous numbers of deaths and illness. With the increase in global transport and communications, as well as urbanization and overcrowded conditions, epidemics due to the new influenza virus are likely to quickly take hold around the world."

Influenza (also called Flu) is a highly contagious respiratory illness that causes annual epidemics in the United States and other countries. Each year in the United States, an average of 200,000 people is hospitalized from complications and 36,000 die from flu. During an influenza pandemic the level of illness and death from influenza will likely increase dramatically worldwide.

To prepare for an influenza or Coronavirus (COVID-19) pandemic, Metro has developed this Planning Guide to effectively educate and protect its employees, customers, and business partners.

This Planning Guide describes Metro's actions to manage future influenza or COVID-19 pandemics. The objectives of the Planning Guide are:

- Reducing spread of the virus, and related illnesses within the agency; and
- Maintain essential activities

This Planning Guide will be activated when phase 5 alert (small clusters of human-to-human transmission), is declared by the WHO. Activation of the plan involves the following:

- The Talent Acquisition Department shall identify a Medical Desk
- Senior Management shall convene a Taskforce of appropriate departments to review and manage implementation of the Plan. For COVID-19, the Taskforce consist of the following Departments: Risk, Safety & Asset Management (Kenneth Hernandez), Operations (Jim Gallagher, Security Systems and Law Enforcement (Robert Green), Human Capital & Development (Joanne Peterson). The Taskforce, in coordination with Metro Emergency Management constitute the ICS Command Staff and reports to the CEO daily as the Incident Commander.
- Based on the severity of the pandemic in the local region and coordination with the local health agency, the Taskforce shall determine the need and timing to implement some or all of the elements of this Guideline.

Appendix A contains the list of phases identified by the WHO to categorize the various phases of a pandemic cycle.

This Planning Guide was assembled to promote good workplace practices in planning for a possible influenza pandemic. It draws the best information available from the WHO, Los Angeles County Department of Public Health, and the Centers

for Disease Control and Prevention. It is recognized that health advice will change over time as new information becomes available, and Metro will continue working with the Los Angeles County Department of Public Health (LACDPH) and other agencies to obtain the latest information on the influenza pandemic as well as follow any imposed restrictions or guidelines.

Primary sources of information in preparing this Guide include: U.S. Government avian and pandemic flu information (<http://www.pandemicflu.gov>), WHO (<http://who.int>), LA County Public Health (<http://lapublichealth.org>), National Strategy for Pandemic Influenza Implementation Plan, and APTA Developing a Contagious Virus Response Plan (April 2013).

2. POLICY

Metro's policy is to provide a safe and healthy workplace for its employees. Metro demonstrates this commitment by its firm belief in the principle that safety comes first for our customers, employees, and business partners as we plan, construct, operate and maintain the region's transportation system.

3. PLANNING ASSUMPTIONS

Pandemics are unpredictable. While history offers useful benchmarks, there is no way to know the characteristics of a pandemic virus before it emerges. Nevertheless, we must make assumptions to facilitate planning efforts. Federal planning efforts assume the following:

- Susceptibility to the pandemic influenza or COVID-19 virus will be universal.
- Efficient and sustained person-to-person transmission signals an imminent pandemic.
- The clinical disease attachment rate will be 30 percent in the overall population during the pandemic. Illness rates will be highest among school-aged children (about 40 percent) and decline with age. Among working adults, an average of 20 percent will become ill during a community outbreak.
- Some persons will become infected but not develop clinically significant symptoms. Asymptomatic or minimally symptomatic individuals can transmit infection and develop immunity to subsequent infection.
- While the number of patients seeking medical care cannot be predicted with certainty, in previous pandemics about half of those who became ill sought care. With the availability of effective antiviral medications for treatment, this proportion may be higher in the next pandemic.
- Rates of serious illness, hospitalization, and deaths will depend on the virulence of the pandemic virus and differ by an order of magnitude between more and less severe scenarios. Risk groups for severe and fatal



Metro

Interoffice Memo

Date	July 21, 2020
To	Metro Management and USG Occupants
From	General Services Management
Subject	USG HVAC SYSTEM & COVID 19 CHANGES OR MODIFICATIONS

INTRODUCTION / OVERVIEW

As we prepare to re-occupy Metro's Union Station Gateway (USG) Building, and resume office work, employees have inquired about the potential for exposure and transmission of COVID through the air within a closed envelope building such as USG. Many of these questions have been about the efficacy of our Heating Ventilation and Air Condition (HVAC) system. We have assembled this information to help answer some of those questions.

Metro's USG Building is in a unique location and its adjacencies pose challenges when keeping the air inside of the building clean and fresh for its approximately 2,400 daily occupants. USG is a 27-story facility that houses administrative offices, IT space, and a parking garage. The HVAC system within USG is a complex system made up of nearly 4,000 pieces of equipment. This system was carefully engineered and commissioned 25 years ago during the original construction of the Union Station East Complex. Its HVAC system has a central plant and operates 24 hours a day / 7 days a week. Following recommendations from a facility condition assessment conducted by Jacobs Engineering, Metro has replaced the main components of the central plant - cooling towers, boilers, and chillers. The system was designed, built, maintained, and been upgraded to meet all standards.

Basic Outside Air System (OSA)

The office floors of the building are provided outside air by an OSA duct system with a supply fan that originates at the HVAC equipment on top of the building. Supply Fan SF-6 is rated at 45,900 cubic feet per minute (cfm). Each office floor currently is supplied with an average of 1,995 cfm of OSA. The main OSA branch duct for each floor is a short segment, sized at 18" x 18", which dumps into the floor mechanical room plenum. Code minimum OSA ventilation is 15 cfm/person. So, with 1,995 cfm of fresh air per floor at a rate of 15 cfm/person, 133 people per floor can be accommodated based on the existing OSA ventilation provided. At its existing rating of 45,900 cfm, Supply Fan SF-6 can provide the code minimum OSA for 3,060 people. Prior to COVID the total employee count within all of USG was approximately 2,400 during a 24-hour period. Since March, the average number of occupants has ranged between 600 and 900 per weekday. Maximum occupancy through the end of August 2020 has been capped at 1,200.

Air Flow

A typical floor has about 20 variable air volume (VAV) boxes, with approximately 20,000 cfm of total rated flow. That is about a 125% diversity over the 16,000 cfm of air supplied to each floor. Normal industry practice is to have no more than 130% diversity, so the existing VAV boxes and supply air duct capacities appear to be sufficient density on the floors.

Filtration

The density of HVAC filters is described as MERV, which stands for Minimum Efficiency Reporting Value. The MERV rating system is used to determine the filter's ability to remove particulates from the air. An air filter's MERV rating is a scale from 1-16 that describes the minimum efficiency of the air filter. A low MERV rating means that the filter does not remove as many particulates from the air. Conversely, a high MERV rating indicates that the filter does a good job of removing particulates from the air. USG's equipment was engineered to use filters with a rating number of MERV 8 and in some cases MERV 10. In response to COVID, the CDC recommended filters with a rating of MERV 13 or higher. Since our system was engineered for MERV 8 and MERV 10 filters, an evaluation of the system was conducted, and it has been determined that the system can handle the increased filtration of the MERV 13. The new filters are on order and expected arrival is late August or early September.

Differential Room Pressurization

Certain rooms within a building should be positively or negatively pressurized with respect to surrounding areas. Positively pressurized rooms are usually designed to protect the occupants, clean supplies, or equipment within the room. All common areas of the building, 1st and 3rd level lobbies, cafeteria, and main hallways are all positive pressurized areas. Negative pressure is used to contain airborne contaminants within a room. All the bathrooms, closed breakrooms, and elevators are negatively pressurized.

Humidity

Control temperature and humidity is between 40% - 60% as required by code and is consistently kept between this range. USG is typically around 55%.

Exhaust System

The exhaust system has not undergone any modification in the 25 years since engineered and installed and is still code compliant. Any modifications needed or recommended would need to be studied by a qualified engineer.

Preventive Maintenance

The HVAC system is cleaned and maintained regularly. The plenums at street level are currently being cleaned. And, General Services has employed a vendor to systematically

move through the building to clean and encapsulate any deteriorating lining in the duct system. The current schedule for filter changing is every six months, however that will be looked at due to the recent change in the filter rating. There is also a water treatment firm on contract that consistently monitors the water quality in the system and does any chemical amendments as necessary to maintain it safely. As an added measure, UV-C technologies are being looked at and evaluated as an enhancement to the cleaning and disinfecting of the air handling unit coils and pans.

Safety Precautions

The HVAC Technicians all wear the appropriate PPE to perform work on all the system equipment and we have implemented additional measures to ensure that any dirty or contaminated system components are immediately disposed of after being changed out. Our techs have also received additional COVID-19 safety training on how to clean and disinfect the system and their work environment.

CONCLUSION

The system is robust and provides significant outside air and flow per person without enhancements. And any increase in outside air would come at the expense of comfort since increases would make it harder to cool and/or heat the building. The cleaning and maintenance regimens are being followed and been stepped up recently. New filters will be added, shortly, but as with all COVID related items being procured there are long lead times and delays. And, an advanced cleaning technology, UV-C, is being evaluated as an added disinfecting method for the air handling units.

So, in closing, is our USG HVAC system safe? Yes. Will it keep us safe from catching COVID? No. Metro has taken action to step up cleaning methods and is working with vendors, the CDC, and the EPA to look for new technologies that could help to fight this pandemic.

However, we still need to mention that nothing can trap and kill the COVID viral microbes. The World Health Organization (WHO) has stated that the virus CAN be transmitted through airborne transmission and there is currently no technology that will catch/trap the microbes as they float through the air. And there are only a handful of disinfectants that will kill it on contact. So PLEASE be safe! Wear your mask, wash your hands frequently and practice social distancing.

RECOMMENDATIONS

METRO CORPORATE SAFETY RECOMMENDATIONS:

- Upgrade HVAC filters to at least MERV 13
- Confirm air distribution patterns/dilution is compliant
- Determine differential room pressurization is compliant
- Control temperature and humidity are between 40% - 60%
- HVAC Technicians are wearing appropriate PPE while performing maintenance of the system.
- Confirm HVAC Technicians are properly disposing of filters and not taking dirty filters to the shop
- Technicians should disinfect all surfaces they will be working on, before and afterwards service work
- HVAC Techs should be trained on COVID-19 protection.

METRO BUILDING SERVICES RECOMMENDATIONS:

- Encapsulating all the duct work throughout building, including rehabilitation of insulation in air handlers
- Increased cleaning regimen for the open loop and enhanced anti-microbial program.
- Open loop_cooling tower repair and cleaning in process
- Closed loop_cooling tower repair and cleaning pending scheduling
- Check fresh air intakes for proper operation
- Do study on effects for using a higher MERV 13 or higher filter
- Need mechanical engineer to assist in evaluation and recommend enhancements
- Keep up with PMs on all HVAC equipment
- Add UVC lighting to sanitize HVAC coils & pans
- Step up cleaning of the plenums, especially at street/track levels

LIST OF EQUIPMENT

- Cooling systems
 - Rooftop cooling towers
 - Open loop
 - Closed loop
 - Chillers on 27th floor
 - Provide chilled water throughout the building and to the Child Care Center
 - Other water-cooled units for 6th floor and 2nd floor using closed loop tower water for condenser heat exchange
- Heating systems
 - Boilers on 27th floor
 - Provide hot water for heating throughout the building
- Air Handlers
 - Typical air handler on most floors with filter rack upstream of cooling coils.
 - Miscellaneous fan coil units
- VAV Boxes throughout the building
- Supply ductwork for distribution throughout each floor
- Return air plenum above ceiling, typical throughout building
- Fresh air intakes at multiple places
 - Main intake is Supply Fan – 6 on the roof
- Filters
 - Typical floor in building uses MERV 8 and 10

REGULATORY REQUIREMENTS

- OSHA – Comply with Cal/OSHA regulations, Title 8, 5142, 5143
- ASHRAE - 62 Outside (fresh) Air Supply requirement
- Minimum requirement is 15 cfm per person
- Average range 15 - 20 cfm per person

###



1.0 COVID-19 SYSTEM LOGIN PAGE

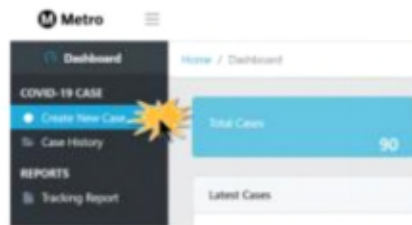
Features: Management Login Portal

To log in: To log into the system, enter your Metro network username and password. The system uses single sign on (SSO).

Link Address: <http://covid-19dev.metro.net/>

2.0 SUBMITTING A NEW COVID CASE

To submit a new COVID case, navigate to the top left of the menu bar, click on "Create New Case." You will be directed to a page that will allow you to input details of the case.



2.1 SAFE-7 COVID CASE SUBMITAL CATEGORIES – MANAGEMENT SUBMITS THE FOLLOWING

GENERAL INFORMATION SECTION

1. **Date of Notification:** Supervisor enters date notified of employee case.
2. **Badge Number:** Employee's badge number. System automatically pulls information from the HR system in the following categories. Note, if employee is a contractor then badge number not needed. Contractor name and job title must be entered manually.

**Metro****Interoffice Memo**

Date	April 22, 2020
To	Distribution
From	Errol F. Taylor  Senior Executive Officer, Maintenance & Engineering
Subject	Social Distancing- Additional Safety Measures

First and foremost, I want to thank each and every one of you as essential transit employees for your dedication to Metro. Your support and hard work do not go unnoticed and we commend you for your excellence.

Please be assured we are taking necessary measures to keep you safe by increasing the intensity and frequency of cleaning, ensuring that social distancing measures are being followed and that personal protective equipment is provided and worn. Remember to follow the posted Metro Social Distancing Protocol.

For increased safety measures, we are strongly requesting you follow the recommendations below in those situations where social distancing may not be possible due to your work assignment, work location or in those situations where more than one employee shares a Metro non-revenue vehicle to a job site.

1. When a crew is traveling to the job site in a non-revenue vehicle with two or more persons, each person shall wear a mask and a wrap-around safety glasses.
2. When two or more employees have to perform a task that is impossible to remain six (6') feet or more apart (e.g. in a bucket truck), each employee involved in the particular task shall wear a mask and a wrap-around safety glasses.
3. Custodians must wear N95 or equivalent KN95 masks. Please remember to follow the posted instructions on how to put on the N-95 Mask/Respirator.

These recommendations meet or exceed current practices followed by peer transit agencies and other public agencies and utilities. Given the current environment, we believe our recommendations provide the best available protection to you.

Lastly, I want to take this opportunity to remind you to please perform the posted Employee Self-Check prior to entering a Metro facility. As we are all part of the same Metro family, we will continue to do our part and will not stop looking for new opportunities to reduce your risk.

If you have any further questions, please contact your management.

Employee Symptom Self-Check



Based on the County of Los Angeles Department of Public Health Safer at Home Order For Control of COVID-19, employees are recommended to conduct a self-check:

1. Do you have a fever?

Yes/No

2. Do you have a dry persistent cough?

Yes/No

3. Do you have chest pain?

Yes/No

4. Are you experiencing any discomfort or have difficulty breathing?

Yes/No

5. Are your lips or face bluish?

Yes/No

If you answered Yes to any of the above questions, please do not enter this facility.

Call your supervisor and seek advice from your healthcare provider.

Metro Social Distancing Protocol

Metro is an essential infrastructure. To keep everyone healthy, Metro has instituted the following social distancing protocol:

- > **Employees and visitors shall conduct a symptom self-check prior to entering their work facility.** If you are experiencing symptoms of respiratory illness, cough or fever, do not enter your work site. Instead, notify your supervisor and seek advice from your healthcare provider.
- > **Employees able to telecommute have been directed to work from home.**
- > **Employees and visitors should wear face coverings at all Metro facilities.**
- > **A social (physical) distance of at least six feet should be maintained between people, especially if they are engaged in conversations or collaboration for greater than 10 minutes.**
- > **Breakrooms, restrooms and other commonly used areas will be cleaned regularly, at least twice daily.**
- > **Soap and water is available in Metro restrooms.**
- > **Hand sanitizer is available in Metro buildings.**
- > **Metro employees and visitors are reminded to:**
 - Wash and/or disinfect your hands frequently, and do not touch your face
 - Cough or sneeze into arm
 - Be cognizant of how many people are riding in elevators in order to maintain social distance when possible



Always Check the Seal's Fit On Your Face Before Each Use

1. Make sure you've put on the respirator according to the manufacturer's instructions.
2. Forcefully inhale and exhale several times.
3. The respirator should collapse slightly when you inhale and it should expand when you exhale. You should not feel any air leaking between your face and the respirator.
4. Adjust the respirator until you get a successful seal fit check.

Limitations of the N-95 Mask/Respirator

- Must be replaced when wet, damaged, soiled or contaminated
- Cannot be worn by individuals with facial hair that gets in the way of the respirator seal (beards, goatees, etc.)
- Cannot be used in an oxygen deficient atmosphere
- Filters particulates only
- Will not protect you from gases, vapors, oil mists (chemicals)
- May be uncomfortable if used for extended periods



How To Put On The N-95 Mask/Respirator



1. Cup the respirator in your hand with the nosepiece right-side up and the headbands hanging freely.
2. Position the respirator under your chin and the nosepiece on the bridge of your nose.
3. While holding the respirator in position, pull the TOP headband over your head and rest it at the crown of the back of your head.
4. As you continue to hold the respirator in position, pull the BOTTOM headband over your head and rest around your upper neck, below your ears.
5. Position the respirator under your chin and the nosepiece on the bridge of your nose again.
6. Using both hands, mold the malleable nosepiece to fit snugly against the nose bridge and face below the eyes.
7. Using a mirror, further check and adjust edges to provide a good seal on the face.
8. After putting on or removing the mask, wash your hands with soap and water or hand sanitizer.



***Masks may be reused for up to a maximum of three (3) days.
Masks must be stored in a resealable bag after each use.**

OPERATIONS GENERAL NOTICE

OPS #20-014

May 07, 2020

TO REMAIN POSTED UNTIL FURTHER NOTICE

SUBJECT: REQUIRED FACE COVERINGS

Effective Monday, May 11, 2020, and continuing until further notice, Metro will require face coverings for all front line employees, including Bus and Rail Operators and Transit Operations Supervisors whose duties involve public contact, for example those assigned to Vehicle Operations or Instructors performing line rides.

Additionally, Metro will require customers traveling on the bus and rail systems to wear face coverings. Metro's Communications Department is taking the lead on disseminating this message to customers. This information campaign is already being put into place. As one part of the messaging, buses and trains will display a new PR message in the headsign: "FACE COVERINGS REQUIRED ON METRO BUSES AND TRAINS".

Bus and Rail Operators are not required to enforce the face covering requirement; enforcement will be the responsibility of law enforcement officers, who will be boarding vehicles to check for compliance and distributing face coverings to passengers as needed. For their personal safety, Operators are advised to avoid confrontation with anyone who boards without a face covering. Similar to long-standing instructions regarding customers who board without paying the required fare, Operators should not make any comments that go beyond a polite, one-time reminder of the face covering requirement. Operators should continue to make every effort to avoid passing up customers, even those without face coverings. It is not necessary to report violators to the Control Center.

Please contact the Instruction Department if you need clarification of any part of these instructions. Your cooperation in maintaining excellent customer service during this difficult time is greatly appreciated.



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Weekly, Bi-Weekly, Monthly Updates on Response to COVID-19

(Sample – December 18, 2020)

Office of the Inspector General

Report No. 21-AUD-05

**Metro**Los Angeles County
Metropolitan Transportation AuthorityOne Gateway Plaza
Los Angeles, CA 90012-2952213.922.2000 Tel
metro.net

DECEMBER 18, 2020

TO: BOARD OF DIRECTORS

FROM: PHILLIP A. WASHINGTON
CHIEF EXECUTIVE OFFICER

SUBJECT: MONTHLY UPDATE ON RESPONSE TO COVID-19

ISSUE

This memo is the monthly update to the Board on Metro's actions responding to COVID-19.

BACKGROUND

Due to the crisis regarding COVID-19, staff will issue monthly updates to the Metro Board of Directors on the latest actions to respond to federal, state, and local directives during this national emergency.

DISCUSSION**Incident Management**

Metro's Incident Management Team (IMT), in coordination with the Emergency Operations Center (EOC) and several departments, continues to respond to public health and safety updates and intelligence briefs, deploy best practices in emergency management, communicate and share information with City, County, State, and Federal partners, and plan for needs related to logistics/supplies for staff, such as gloves and masks, the impact of ridership reductions, the financial analysis associated with grant reimbursement opportunities and other emergency response activities. The IMT will remain activated meeting weekly during the continued declarations of emergencies and is linked to the EOC on a 24-hour basis for emergency updates and response. Metro staff receives regular updates and guidance on how to respond to cases of positive tests for COVID-19 and to take prescriptive actions related to quarantine directives from LA County Public Health.

Weekly, Bi-Weekly, Monthly Updates on Response to COVID-19

(Sample – December 18, 2020)

Office of the Inspector General

Report No. 21-AUD-05

Metro continues to send out daily COVID-19 briefs using our emergency alert system to all field staff and maintains a 24-hour duty-officer to receive COVID-19 related calls from staff or external stakeholders.

Operations

The current ridership for the week of 12/6/20-12/12/20 indicates that Metro is carrying about 543,645 boardings/weekday. Field observations continue to show that the majority of customers (99% or greater) are wearing face masks/coverings when riding on our system. Operations is actively enforcing that the front of buses are no longer roped off to allow for additional capacity in support of social distancing for customers.

Service

Bi-annual service changes took place on Sunday, December 13, 2020. Bus service adjustments include changes to increase efficiency and added trips on weekdays and weekends as follows:

15-minute improved frequency during daytime weekdays on five lines: Lines 53 (Central Av), 55 (Compton Av), 70 (Garvey Av), 152 (Roscoe Bl), 603 (Hoover St).

20-minute improved frequency during daytime or peak weekdays on three lines: Lines 165 (Vanowen St), 234 & 734 (Sepulveda Bl).

30-minute improved frequency during the daytime weekdays on Line 90/91 (Sunland/Sylmar via Foothill Bl).

Also, Metro's MicroTransit service began revenue operations for the Watts/Willowbrook and LAX/Inglewood service zones at \$1 per trip. Since the launch of service, on December 13, 2020, Metro Micro has completed 119 trips and has carried 134 customers. To protect our Metro Micro operators and customers, face masks are required, plexiglass partitions have been installed, and the vehicles are cleaned daily. Additionally, while Metro Micro vehicles have capacity to seat a maximum of 10 passengers, capacity has been limited to 50% to allow for distancing unless traveling with family and friends in the same small group.

Lastly, Rail service will continue with an enhanced modified Sunday schedule and use of weekday rail-car consists to the extent possible. Operations will continue to monitor ridership and adjust service as necessary as we prepare for ridership to change as schools reopen and as restrictions are gradually lifted.

To help Metro's customers celebrate the holiday season safely during the current stay at home order, all Metro Bus, Rail and MicroTransit services will provide free service on the nights of Christmas Eve and New Year's Eve for customers who will need to use the system.

Strengthened Cleaning Regimes, PPE & UV-C Light Pilot Update

Weekly, Bi-Weekly, Monthly Updates on Response to COVID-19

(Sample – December 18, 2020)

Office of the Inspector General

Report No. 21-AUD-05

Metro continues to practice strengthened cleaning regimes in response to COVID-19 on all vehicles, stations and terminals with EPA-approved disinfectants. The necessary personal protective equipment (PPE) continues to be distributed and procured as safety is our top priority. Efforts to improve disinfection and sanitation on our system continues and Metro is in process of testing the application of copper in high touch areas on a Bus and Rail cars and at various locations at the Gateway building. The tests will comprise of durability and efficacy, which will be done in partnership with the EPA.

Communications**Media Coverage**

The Agency and its staff members were not mentioned in print and electronic stories through Thursday, November 19, 2020.

Workforce Communications

We are continuing to individually package the masks received from the FTA. We have packaged more than 260,000. Street teams, eight pairs of two, will begin mask distribution Monday, December 7 through Thursday, December 24. They will rotate throughout the system from 9 a.m. – 3 p.m.

COVID-19 Confirmed Cases

Metro continues to post a list of confirmed cases of COVID-19 among Metro employees, contractors and vendors. The list is available [via this link](#) on the Metro website and will be updated by 6 p.m. daily.

As of December 18, 2020, 12 p.m., Metro has 842 Total (525 active) Confirmed Cases:

- 255 Operators
- 195 Maintenance
- 125 Administrative
- 15 Security
- 252 Contractors/Vendors
- 3 Deaths (1 Contractor/Vendor; 2 Bus Operations)
- 317 Recovered

Metro Headquarters Reopening Update

Since March 2020, Metro has evolved with the ongoing changes and implications that COVID-19 has created. As we navigate through this global crisis, we want to ensure employee awareness of our organization's path forward as stewards of public trust and leaders within the transportation infrastructure industry.

During the first week of November, COVID-19 case rates increased by approximately 50 percent in California. On Monday, November 16, 2020, 94 percent of California's population was transitioned to the most restrictive tier under the state's Blueprint for a Safer Economy.

Weekly, Bi-Weekly, Monthly Updates on Response to COVID-19

(Sample – December 18, 2020)

Office of the Inspector General

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Considering an unprecedented, rapid rise in COVID-19 cases across Los Angeles County, it is recommended that Metro continue to progress through Phase Two of the Our Path Forward Plan until March 31, 2021.

This decision will provide staff the ability to remain productive within their alternative work environments and encourage telecommuting where it is optimal. The agency will also continue operating with no more than 50% capacity at Union Station Gateway (USG). Over the last month, capacity within USG has remained at 35%.

Internal and external conditions will be monitored weekly to determine the safe transition into Phase Three, with the safety and security of Metro employees being the number one priority.

Workforce and Leave Policy

Well-Being Services continues to support the COVID-19 leave of absence process that aligns with the Families First Coronavirus Response Act (FFCRA). Since April 1, we have resolved more than 1,085 inquiries sent to our dedicated phone and email inboxes for COVID-related leave questions.

Currently, there are approximately 660 employees on a continuous non-occupational medical leave of absence (less than one year), from an average of anywhere from 450-500. In addition, there are 68 employees off work using continuous Emergency Family/Medical Leave (EFML) under the FFCRA, or who were advised to self-quarantine due to their age and who required leave beyond the provisions of the FFCRA. This brings the total number of employees off due to non-occupational reasons to approximately 728. Additionally, we have approximately 174 employees in our Long-Term Disability process (both occupational and non-occupational conditions), and 2 of these employees are off work due to COVID-related reasons. In sum, Well-Being Services is managing files for approximately 902 employees on leave, both COVID-related and unrelated. These figures continue to remain at all-time highs.

Medical Services continues to coordinate the return-to-work process for employees who were exposed to or confirmed to have COVID-19. To date, we have returned 310 employees to work who previously tested positive for COVID-19 and 5 are currently pending clearance. Since April, in total we have returned 1,583 employees to work who were off due to COVID-related reasons, including exposure or suspected/confirmed positive cases. Due to the recent surge of cases in LA County, we are experiencing a very large backlog in cases to be processed, which is creating a delay in the return-to-work process and, consequently, an increase in paid administrative leave usage and manpower shortages. We estimate about 250+ employees are currently pending return-to-work exam scheduling. The Well-Being Services team is simply not staffed for our current workload, so we have been actively working with our partners and SLT to

Weekly, Bi-Weekly, Monthly Updates on Response to COVID-19

(Sample – December 18, 2020)

Office of the Inspector General

Report No. 21-AUD-05

implement solutions to address the issue, including augmenting our loaned support staff.

Labor-Management Partnership

Metro continues to meet weekly with our senior leaders and our 5 labor unions to discuss the impacts of the pandemic on our workforce.

Construction

Work continues for all projects under construction. There are periodic reports of positive COVID-19 cases on specific projects. CalOsha recently issued revised guidelines regarding workplace safety to minimize impacts of the pandemic. These include those related to social distancing and quarantine requirements after contact with an infected worker. All contractors are complying with these regulations.

NEXT STEPS

Metro continues to monitor and adapt to the evolving situation. As the crisis continues, we will stay in close contact with the Board to keep everyone informed.

For more information or if you have questions, please contact me directly at 213-922-7555 or our Chief of Staff, Nadine Lee, at 213-922-7950.

Metro COVID-19 Daily Briefs to Employees
(Sample – December 23, 2020)

Office of the Inspector General

Report No. 21-AUD-05



Hi everyone, Jordan here. We have two news items to share with you today. The first, managers and supervisors received in their inbox this morning, but in case you missed it, we've included an update about the COVID-19 Cases Reporting System below. And the second is about a new poster you will see hanging around your work location in the next week. There will be no Daily Brief tomorrow unless there is breaking news to share. We will update the COVID-19 Case Tracker tomorrow by 5 p.m. The Daily Brief and the COVID-19 Case Tracker will resume on Monday, December 28. To those of you who are celebrating have yourself a Merry Little Christmas, please be safe and be well.

Today's Update:

- COVID-19 Cases Reporting System Quick-Launch Icon
- New Signage for All Locations
- The Goods
- Facts and Figures

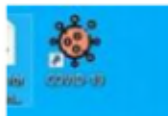
COVID-19 Case Reporting System Quick-Launch Icon

Today the Risk, Safety & Asset Management (RSAM) department's Corporate Safety team, has launched the COVID-19 Case Reporting System quick-launch icon.

Metro COVID-19 Daily Briefs to Employees
(Sample – December 23, 2020)

Office of the Inspector General

Report No. 21-AUD-05



The quick-launch icon will be part of automatic system updates to all computers within Metro's network. As a reminder, for Windows 10, users need to Sign Out and Sign back in to receive the desktop icon. For Windows 7, users need to log off and log back in to receive it. If you are working remotely and wish to access the system, you will need to use VPN.

If you have any questions regarding the system, contact Steve Flores, Principal Safety Specialist, at FloresS3@metro.net.

New Signage for All Locations

The attached poster will be hung at all Metro locations over the next week to remind all building occupants of the social gatherings rule on Metro property. Please make sure you are adhering to all posted signage. Should your location need more, all signage is available to download and print on the [Coronavirus Updates page on myMetro](#).

The Goods

Don't miss the 61st Annual L.A. County Holiday Celebration this Christmas Eve! Enjoy the performances from the safety and comfort of your home. Watch on PBS SoCal or stream online: metro.la/90Zg50CG6n



Facts and Figures

Confirmed Cases

This document is updated daily Monday through Friday by 6 p.m. More information is available on [myMetro](#).

Metro COVID-19 Daily Briefs to Employees
(Sample – December 23, 2020)

Office of the Inspector General

Report No. 21-AUD-05

[Responding & Reporting COVID-19 Cases](#)

Learning tool developed to assist you in navigating the response and reporting process of COVID-19 cases.

[L.A. County Department of Public Health COVID-19 Surveillance Dashboard](#)

An interactive dashboard for COVID-19 case information.

[FAQs](#)

We will continue to update the FAQs on the SharePoint page. Please check back frequently.

[Employee Assistance Program](#)

EAP can be reached 24 hours a day, 7 days a week at 877-335-5327 or www.guidanceresources.com.

Kaiser Mental Health Crisis Intervention Hotline

For Kaiser Patients who may be experiencing a mental health crisis call 800-900-3277. This hotline can be reached 24 hours a day, 7 days a week.

[The Source](#)

Metro's blog will keep employees and the public up to date on all our external messaging.

[myMetro Stories](#)

Check out myMetro for activities you can do after work, on the weekend or while in self-quarantine.

COVID-19 (Safety) Helpline

For questions regarding COVID-19 reporting, you may contact the Risk, Safety and Asset Management team at (213) 92-COVID (213-922-6843).

Employee Hotline

For the audio version of the Daily Brief call 877-955-5234.

Emergency Operations Center (EOC)

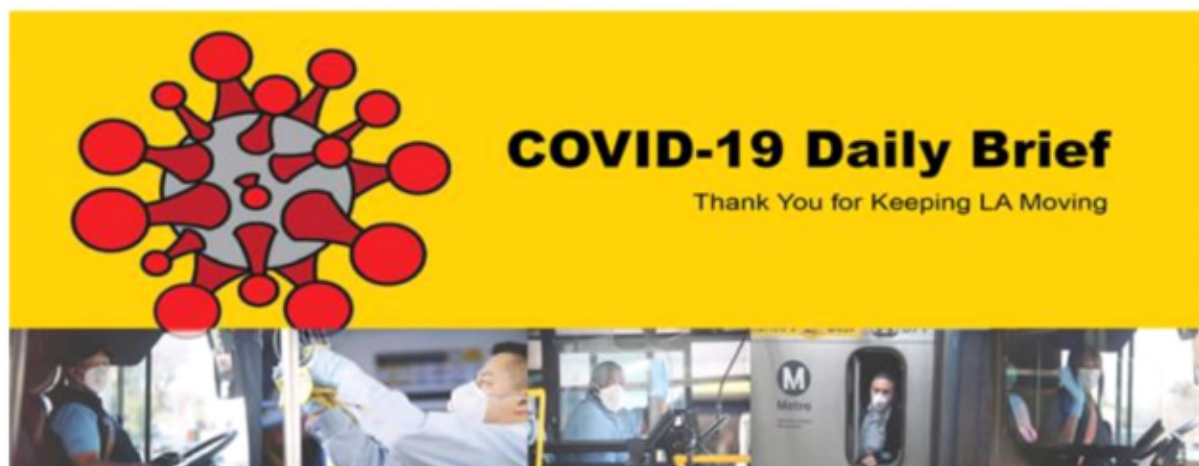
Metro's centralized location for incident management and coordination. Employees can call 213-922-8899 to get information about Metro's COVID-19 response.

PPE Weekly Update

The next update will be Friday, January 8, 2021.

If you have news, pics or updates to share, please send them my way! Vanni@metro.net





Hi everyone, Jordan here. I hope you all had a wonderful and safe Labor Day Weekend. There is one news item to share with you today and it includes an attachment. Please be sure to review both. For those of you who live and work near the Bobcat Fire, your Metro family sends our best wishes, thoughts, and prayers your way. Continue to stay and be safe everyone.

Today's Update:

- Metro Healthy Offices Toolkit
- The Goods
- Facts and Figures

Metro Healthy Offices Tool Kit

To standardize Metro's internal COVID-19 safety messages, we developed a Metro Healthy Offices Toolkit that focused on key COVID-19 messages to help keep us all safe—face coverings, social distancing and symptoms checks. Marketing has created poster templates for the following uses:

- General entrances
 - To be posted at any main entrance, reminding employees and visitors of required face coverings, social distancing, and do not enter if you're not feeling well.
- Elevator banks
 - To be posted in elevator lobbies. Currently, maximum capacity allowed for elevators is four people.
- Conference rooms

- These posters allow for locations to establish maximum occupancy limits and encourage virtual meetings as a better way to practice social distancing.
- Break rooms and quiet rooms
 - These posters allow for locations to establish maximum occupancy limits and provide a reminder to wash hands before touching surfaces and handles.
- Face covering reminders
- Lactation spaces
- Social distancing floor decals
 - To be posted where lines may form, and only if your locations need additional floor decals or need to replace any damaged or worn decals. For reprints, divisions should contact Facilities Maintenance, and if you're at Gateway, contact General Services.

Posters have been distributed to all Metro locations. If your facility needs additional quantities, please visit the [Coronavirus Updates page](#) on myMetro to find poster templates that you may reprint as needed. Please use the attached document as a cheat sheet as necessary.

The Goods

The Farmer John's Thank You Tour, "FJ Thanks Essentials," continued last week when they dropped off hotdogs for our Front Line Staff at Division 11 in Long Beach on Friday.

Check out some photos below.

COVID-19 Poster Guidance

General Entrance Poster	Breakroom/Lounge*	Quiet Room Poster*	Conference/Meeting Rooms*	Four Person Elevator Signs	Social Distancing Floor Decal**
Let's keep Metro safe for everyone.  > Face covering required > Practice social distancing > Do not enter if you're feeling sick (Employees: Call your supervisor and seek advice from your healthcare provider) Thanks for your cooperation.	Let's keep Metro safe for everyone.  > Wash your hands before touching all surfaces and handles > Maximum breakroom capacity:  > Practice social distancing > Face covering required Thanks for your cooperation.	Let's keep Metro safe for everyone.  > Maximum quiet room capacity:  > Practice social distancing > Face covering required Thanks for your cooperation.	Let's keep Metro safe for everyone.  > Maximum room capacity:  > Practice social distancing > After using this room, please contact Facilities Maintenance Trouble Desk at ext. 24614 Reminder: Online meetings are the better way to practice social distancing.	Let's keep Metro safe for everyone.  > Face covering required > Max of four people in elevators > Practice social distancing > Limit conversation > Do not enter if you're feeling sick (Employees: Call your supervisor and seek advice from your healthcare provider) Thanks for your cooperation.	
- General Entrance Posters should be posted at all building entrances. - This poster should be the first signage anyone sees before entering Division/Location Building(s).	Breakroom Posters should be posted at all breakroom and kitchen entrances.	Quiet Room Posters should be posted at all Quiet room entrances.	- Conference/Meeting Room Posters should be posted at all conference / meeting room entrances. - There are writable sections for room capacity.* - Contact Facilities Maintenance Trouble Desk at Ext. 2-4614 or email fmtroubledesk@metro.net	- Elevator Poster should be posted at the main entrance of each elevator bank. - There is limited exposure time within elevators. This poster is for a maximum capacity of four people per elevator at each Division/Location, or at Management's discretion.	- Floor decals should be posted in areas where lines may form. (e.g. TOS/RTOS window, Sign-on/off kiosks, Manager's office, etc.) or where a larger group of employees assemble (e.g. Breakroom, kitchen, etc.). - Existing Decals prior to new decal implementation can remain in use.

*The maximum capacity should be determined based on how many people can physically distance more than 6 feet apart, but in no case should there be more than 10 people at a time.

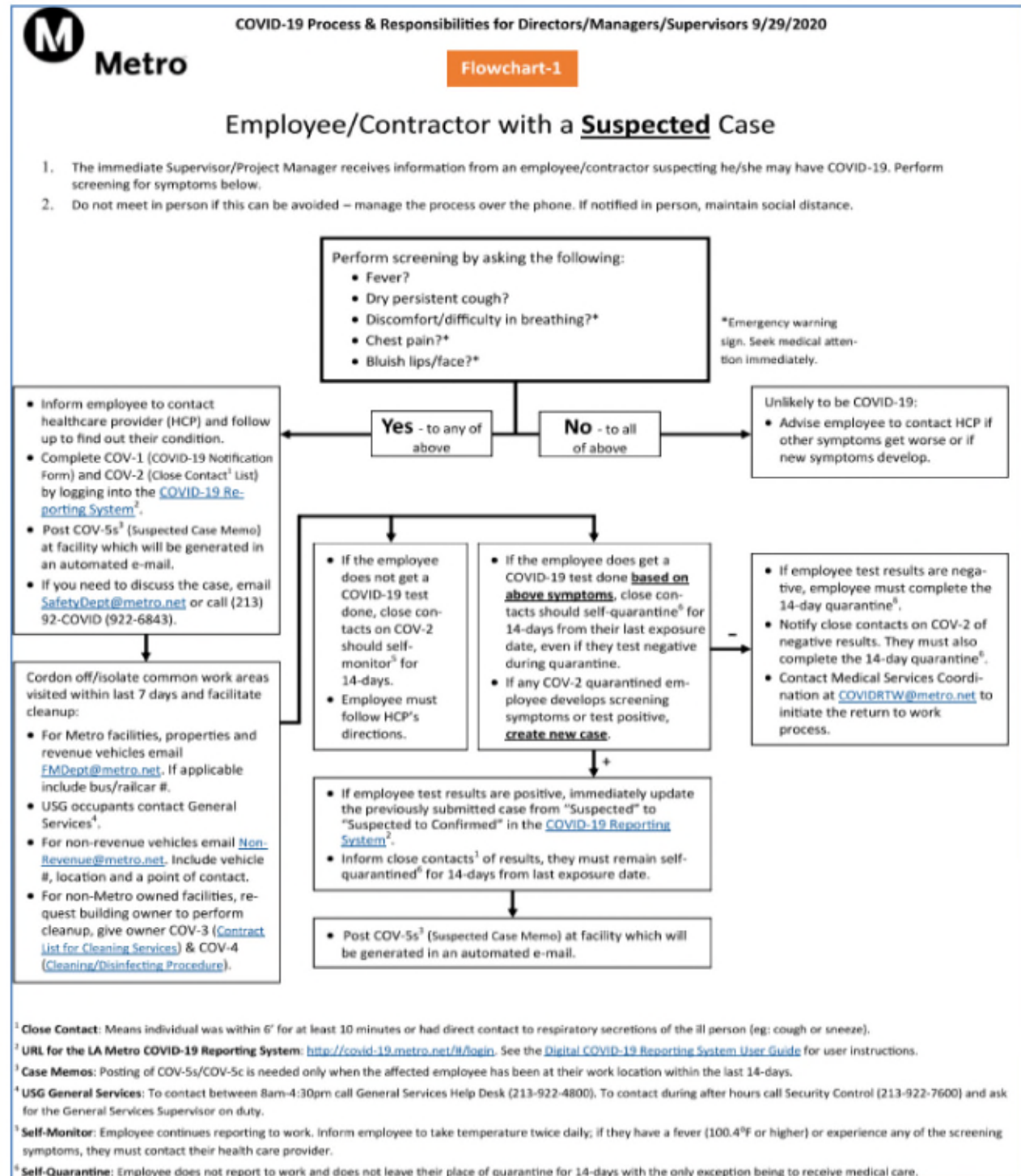
**To Order more Decals contact your Designated Safety Representative.

For Printable versions of the Posters visit Mymetro.net > Coronavirus Updates > Fact Sheets and Posters > Metro Healthy Offices Tool Kit.

Metro COVID-19 Process and Responsibilities for Directors/Managers/Supervisors

Office of the Inspector General

Report No. 21-AUD-05



Metro COVID-19 Process and Responsibilities for Directors/Managers/Supervisors

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Metro

COVID-19 Process & Responsibilities for Directors/Managers/Supervisors 9/29/2020

Flowchart-2

Employee/Contractor with a **Confirmed** Case

- Complete COV-1 (COVID-19 Notification Form) and COV-2 (Close Contact¹ List) by logging into the [LA Metro COVID-19 Reporting System](#)².
- Post COV-5s³ (Suspected Case Memo) at facility which will be generated in an automated e-mail.
- If you need to discuss the case, email SafetyDept@metro.net or call (213)92-COVID (922-6843).

- Notify close contacts on COV-2 to self-quarantine⁴ for 14-days from their last exposure date, even if they test negative during quarantine.
- If any quarantined employee develops screening symptoms or test positive, **create new case**.

- Cordon off/isolate common work areas visited within last 7 days and facilitate cleanup:
- For Metro facilities, properties and revenue vehicles email FMDept@metro.net. If applicable include buses/railcars #.
 - USG occupants contact General Services⁵.
 - For non-revenue vehicles email NonRevenue@metro.net. Include vehicle #, location and a point of contact.
 - For non-Metro owned facilities, request building owner to perform cleanup, give owner COV-3 ([Contract List for Cleaning Services](#)) & COV-4 ([Cleaning/Disinfecting Procedure](#)).

- Prior to returning to work, all quarantined employees must go through Medical Services Coordination. Contact COVIDRTW@metro.net to initiate the return process.

¹ **Close Contact:** Means individual was within 6' for at least 10 minutes or had direct contact to respiratory secretions of the ill person (eg: cough or sneeze).

² **URL for the LA Metro COVID-19 Reporting System:** <http://covid-19.metro.net/#/login>. See the [Digital COVID-19 Reporting System User Guide](#) for user instructions.

³ **Case Memo:** Posting of COV-5c is only needed when the employee has been at their work location within the last 14-days

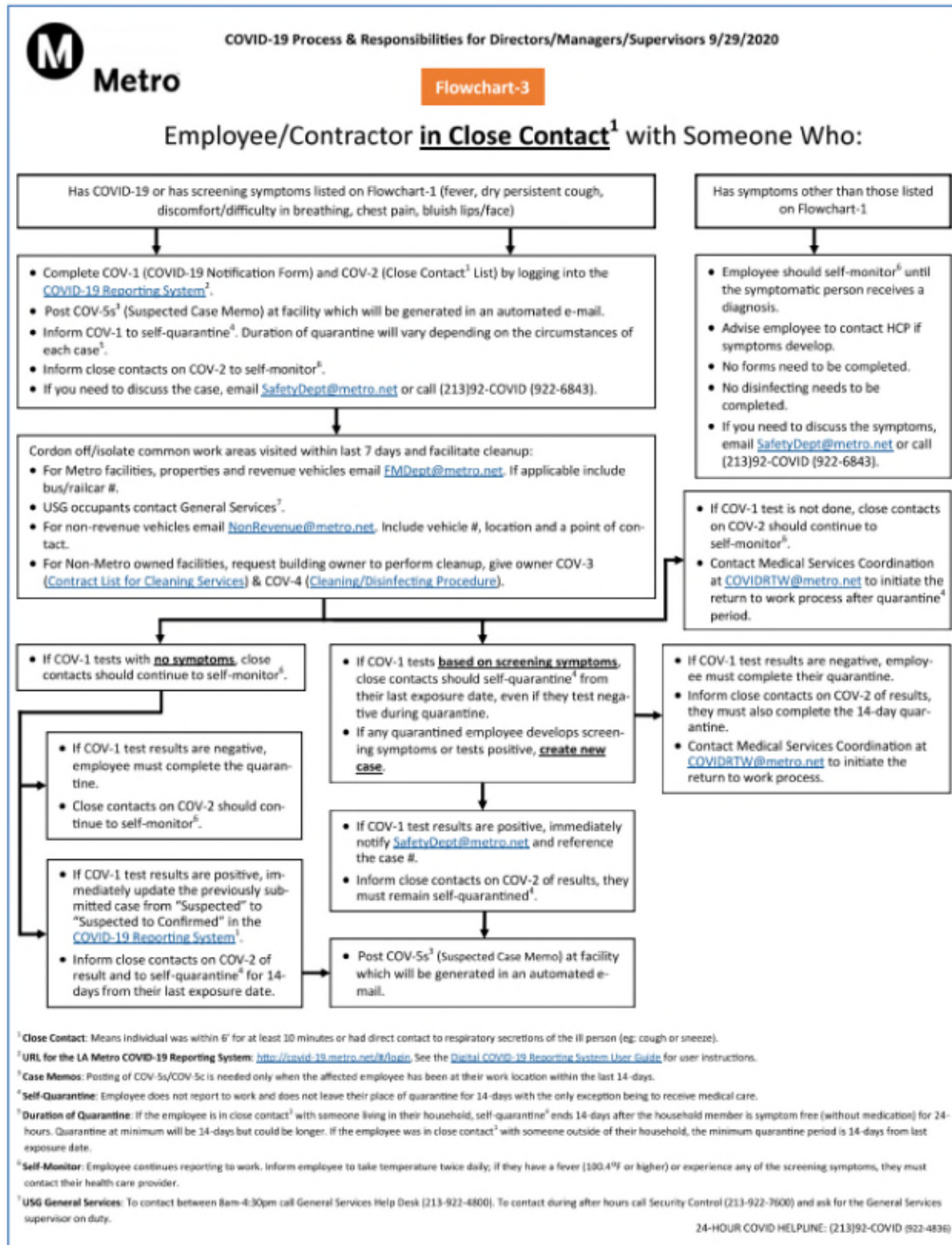
⁴ **Self-Quarantine:** Employee does not report to work and does not leave their place of quarantine for 14-days with the only exception being to receive medical care.

⁵ **USG General Services:** To contact between 8am-4:30pm call General Services Help Desk (213-922-4800). To contact during after hours call Security Control (213-922-7600) and ask for the General Services Supervisor on duty.

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¹ **Close Contact:** Means individual was within 6' for at least 10 minutes or had direct contact to respiratory secretions of the ill person (eg: cough or sneeze).

² **URL for the LA Metro COVID-19 Reporting System:** <http://covid-19.metro.net/#/login>. See the [Digital COVID-19 Reporting System User Guide](#) for user instructions.

³ **Case Memos:** Posting of COV-5s/COV-5c is needed only when the affected employee has been at their work location within the last 14-days.

⁴ **Self-Quarantine:** Employee does not report to work and does not leave their place of quarantine for 14-days with the only exception being to receive medical care.

⁵ **Duration of Quarantine:** If the employee is in close contact¹ with someone living in their household, self-quarantine⁴ ends 14-days after the household member is symptom free (without medication) for 24-hours. Quarantine at minimum will be 14-days but could be longer. If the employee was in close contact¹ with someone outside of their household, the minimum quarantine period is 14-days from last exposure date.

⁶ **Self-Monitor:** Employee continues reporting to work. Inform employee to take temperature twice daily; if they have a fever (100.4°F or higher) or experience any of the screening symptoms, they must contact their health care provider.

⁷ **USG General Services:** To contact between 8am-4:30pm call General Services Help Desk (213-922-4800). To contact during after hours call Security Control (213-922-7600) and ask for the General Services supervisor on duty.

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Metro

Los Angeles Metro Corporate Safety

COV-2

Influenza/COVID-19 Contact List

Purpose:

A contact list must be established to identify employees/contractors who were in **Close Contact¹** with the suspected or positive individual starting **2 days before symptoms started until sent home**.

For possible exposure to a suspected case, the contact list must be notified to **self monitor²**.

For possible exposure to a confirmed case (or scheduled COVID-19 test), the contact list **must be told to self-quarantine³** and contact their healthcare provider if symptoms develop.

Retain this Contact List and submit immediately to safetydept@metro.net.

Any employees/contractors in Close Contact¹ between the two (2) days before symptom onset and last day worked must be informed of possible exposure and must self-quarantine.

DAY 1	DAY 2	DAY 3	DAY 4	DAY 5
		Employee/Contractor has onset of symptoms listed in form COV-1.		Employee/ Contractor reports symptoms to supv. & goes home. THIS IS LAST DAY WORKED (enter in this date on form COV-1) Employee to provide all Close Contacts ¹ encountered on Day 1 and Day 2 prior to symptom onset until the last day worked.

Definitions:

- **¹Close Contact:** as defined by the CDC and LACDPH, means individuals were within 6' for more than 10 minutes with the affected staff or had direct contact to respiratory secretions of the ill person (eg: cough or sneeze).
- **²Self-monitor:** Inform employee to take temperature twice daily. If they have a fever (100°F or higher taken orally) they must contact their health care provider. If they experience any of symptoms (listed on COV-1), they must consult their healthcare provider.
- **³Self-quarantine:** means employee cannot leave their place of quarantine for all 14 days, with the only exception being to receive medical care.

REV. 5/12/2020

Metro COVID-19 Prevention Program (CPP)
(Selected Pages)

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Report No. 21-AUD-05

LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

RISK, SAFETY & ASSET MANAGEMENT



METRO COVID-19 PREVENTION PROGRAM (CPP)

December 2020

Metro COVID-19 Prevention Program (CPP)
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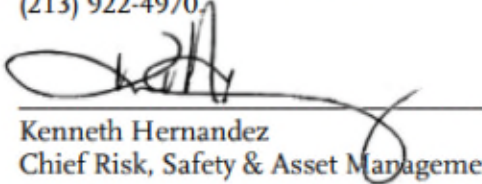
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In accordance with the Emergency COVID-19 regulations adopted by the California Occupational Safety and Health Standards Board on November 19, 2020, the Risk, Safety and Asset Management Department, in collaboration with Human Capital & Development, has developed this COVID-19 Prevention Program. The regulations have been embodied in Title 8, Division 1 Chapter 4, Subchapter 7, Section 3205 through 3205.4. A pandemic is characterized by widespread human to human transmission of a virus, on a global scale. While no one can predict the severity of a pandemic, the Pandemic of 1918 is widely believed to have taken roughly 50 million lives worldwide, underscoring the need for proper planning. We should replace the 1918 pandemic reference and numbers with the 2020 pandemic and the current numbers known to date.

Each department and location has the responsibility to follow, as outlined, this COVID-19 Prevention Program. The program is consistent with Metro's policy to provide a safe and healthy working environment for employees and a safe transit system for the public.

This document will be maintained by Corporate Safety and updated when conditions warrant such changes.

If you have any questions or need additional information regarding this plan, please contact Collins Kalu, Sr. Director, Safety Certifications & Operations Management at (213) 922-4970.


Kenneth Hernandez
Chief Risk, Safety & Asset Management Officer

12/18/2020
Date


Joanne Peterson
Chief Human Capital & Development Officer

12/21/2020
Date

Metro COVID-19 Prevention Program (CPP)
(Selected Pages)

Office of the Inspector General

Report No. 21-AUD-05

TABLE OF CONTENTS

1. INTRODUCTION	5
2. POLICY	5
3. AUTHORITY AND RESPONSIBILITY	5
4. DEFINITIONS	6
5. ELEMENTS OF METRO COVID-19 PREVENTION PROGRAM (CPP)	7
6. APPENDIX A: Reasonable Accommodation (HR 25) Policy	21
7. APPENDIX B: COVID-19 Frequently Asked Questions (FAQs)	48
8. APPENDIX C: COVID-19 Process & Responsibilities/Digital Reporting System Site	129
8. APPENDIX D: Workplace COVID-19 Assessment/Inspection Checklist	138
9. APPENDIX E: COVID-19 Reporting, Leave and Return to Work Processes (Training Module)	139
10. APPENDIX F: Self-Certification Form	158

Metro COVID-19 Prevention Program (CPP)
(Selected Pages)

Office of the Inspector General

Report No. 21-AUD-05

INTRODUCTION

According to the World Health Organization (WHO), "An influenza pandemic occurs when a new influenza virus appears against which the human population has no immunity, resulting in several simultaneous epidemics worldwide with enormous numbers of deaths and illness. With the increase in global transport and communications, as well as urbanization and overcrowded conditions, epidemics due to the new influenza virus are likely to quickly take hold around the world."

Influenza (also called Flu) is a highly contagious respiratory illness that causes annual epidemics in the United States and other countries. Each year in the United States, an average of 200,000 people is hospitalized from complications and 36,000 die from flu. During an influenza pandemic the level of illness and death from influenza will likely increase dramatically worldwide.

To mitigate the spread of the COVID-19 illness which has resulted in the current pandemic, Metro has developed this prevention program to effectively educate and protect its employees, customers, and business partners.

This document describes Metro's actions, that we have taken since the pandemic began in early 2020 in the United States, to manage the COVID-19 pandemic. These measures and actions will continue into the foreseeable future until the pandemic is under control. The objectives of the COVID-19 Prevention Program are:

- Reducing spread of the coronavirus called SRAS-CoV-2, and related COVID-19 illness within the agency, maintaining a safe and healthy workplace and
- Maintaining essential activities

POLICY

The Los Angeles County Metropolitan Transportation Authority (Metro) is committed to providing a safe and healthy workplace for all employees. This means that safety takes a pre-eminent role in the decision making before all other considerations.

- Reducing spread of the virus, and related illnesses within the agency; and
- Maintaining essential activities

AUTHORITY AND RESPONSIBILITY

All Metro staff shall comply with this CPP. The Chief Executive Officer has designated authority to the Chief Risk, Safety & Asset Management Officer to monitor the CPP implementation, compliance and maintenance.

Each department has responsibilities under the CPP and shall support its implementation. Departments shall also provide the ongoing support necessary for achievement of CPP objectives. Individual employees have responsibilities under the CPP, and supervisors/managers must enforce safety requirements pertaining to their employees. A key to the success of the CPP is for employees to be aware that they are accountable for meeting all safety requirements of their positions. The CPP's success depends on all employees actively identifying

POLICY BRIEF

Institute of
Transportation
Studies



When is Public Transit Too Crowded, and How Has This Changed During the Pandemic?

Tianxing Dai, Undergraduate Researcher, UCLA Institute of Transportation Studies
 Brian D. Taylor, PhD, FAICP, Professor of Urban Planning, and Director of the UCLA Institute of Transportation Studies

October 2020

Issue

One of the first measures that U.S. public health authorities recommended in response to the COVID-19 pandemic was social distancing: U.S. Centers for Disease Control (CDC) guidelines recommended that people “stay at least 6 feet (about 2 arms’ length) from other people who are not from [their] household in both indoor and outdoor spaces.”¹ Public transit agencies had to then figure out what social distancing meant for their vehicles and riders. To track and evaluate transit operator implementation of social distancing recommendations, UCLA Institute of Transportation Studies (ITS) researchers searched for and reviewed the websites of 200 transit agencies across the U.S. There is no industrywide standard for vehicle crowding before the pandemic, nor is there one now — as definitions of socially distanced transit vary widely. This policy brief summarizes what the researchers learned about agency definitions of crowding before and during the COVID-19 pandemic.

Findings

Missing crowding definitions

Of the 200 transit agencies investigated, only 92 (46%) publicized their pre-pandemic crowding standards, and only 84 (42%) publicized their pandemic-specific crowding standards. This suggests that a majority of transit operators either have not formally adopted, or do not publicize, these standards. During the COVID-19 pandemic, many transit agencies’ public documents and communications stress the importance of 6-foot social distancing by passengers and

the frequent cleaning and disinfecting of their vehicles, but do not specify the maximum number of passengers that can be safely onboard. Instead, vague references to “blocking of some seats” and “keep[ing] every other row empty” are common.

Comparing crowding definitions

For each transit operator surveyed, we sought to identify and compare the definitions of crowding before and during the pandemic. In general, pre-pandemic definitions of crowding on 35-, 40-, and 60-foot buses are consistent with those recommended in the *Transit Capacity and Quality of Service Manual*.²

Light- and heavy-rail vehicles have higher passenger capacities than most buses, though pre-pandemic standards of crowding vary substantially more than among buses, which likely reflects the enormous variance in both the age and patronage of U.S. rail transit systems, such as the 116-year-old New York subway (5,437,587 pre-pandemic weekday boardings³) and the six-year-old Sun Link light rail in Tucson (3,602 pre-pandemic weekday boardings⁴).

Amidst the pandemic, the transit agencies surveyed reduced their crowding standard from 69% to 83%, on average, to ensure social distancing among passengers. The mean pandemic crowding standard is 16.5 passengers for 35- and 40-foot standard buses (standard deviation=5.8) and 23.4 passengers on 60-foot articulated buses (standard deviation=8.7). Some of those surveyed have relaxed their pandemic crowding standards as passenger demand (if not CDC guidelines) has increased over the course of the pandemic. Thus, it appears that some systems have not


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Summary of pre- and post-pandemic crowding standards at 84 U.S. transit agencies

	Pre-pandemic maximum (std dev)	Standard deviation as a % of mean	Pandemic maximum (std dev)	Standard deviation as a % of average	Percent change from pre-pandemic standard
35'x40' buses	54.9 pax (9.5)	17.3%	16.5 (5.8)	35.2%	-69%
60' buses	89.1 pax (19.5)	21.9%	23.4 (8.7)	37.2%	-74%
Light rail vehicles (LRV)	168.9 pax (52.3)	31.0%	28.1 (8.6)	30.6%	-83%
Heavy rail vehicle (HRRV)	173.0 pax (90.6)	52.4%	36.6 (16.2)	44.5%	-77%

Note: numbers in parentheses are standard deviations

adopted pandemic-specific crowding standards because they are not able to add sufficient service to accommodate socially distanced demand.

During the pandemic, few transit agencies specified their crowding standards on light- and heavy-rail vehicles. Researchers need more information from agencies to draw meaningful conclusions. The table below shows a summary of pre-pandemic and pandemic crowding standards.

Conclusion

Social distancing has been a primary public health recommendation during the COVID-19 pandemic. Given that its purpose of moving people en masse, public transit is a challenging setting for maintaining social distancing. The researchers' survey of 200 public transit operators finds

that most (116 out of 200) do not publish pandemic-specific crowding standards for their vehicles. Others have standards that complicate comparisons across agencies and are difficult for riders to interpret (such as floor area per passenger). While acceptable passenger loads declined between 69% and 83% for those publishing standards, what constitutes acceptable levels of crowding varies widely across systems, transit modes (particularly rail), and in some cases over time. Finally, this research focused on the adoption and publication of crowding standards; given the many challenges to enforcing them, passengers likely find passenger loads on transit vehicles, and whether they are safe, challenging to predict.

More Information

This brief is part of the "Monitoring and Adjusting Transit Service during a Pandemic" research project, part of the UC Institute of Transportation COVID-19 Response and Recovery research initiative. More information about the research project can be found at www.ucts.org/research-project/2021-12.

¹ <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/social-distancing.html>

² National Academies of Sciences, Engineering, and Medicine. 2013. Transit Capacity and Quality of Service Manual, Third Edition. Washington, DC: The National Academies Press. <https://doi.org/10.17226/24766>.

³ Metropolitan Transportation Authority. Introduction to Subway Ridership, n.d., <http://web.mta.info/mjct/facts/ridership/>. Accessed 18 October 2020.

⁴ Sun Tran. Monthly Operations Report, February 2020, <https://www.sunlinkstreetcar.com/documents/FEB%20%202020%20%20STSL%20%20MOR%20.pdf>. Accessed 18 October 2020.

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