

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

**Audit of Metro Transit Security
Services Performance
Fiscal Years 2023 and 2024**

Report No. 25-AUD-06

June 3, 2025





Metro

**Los Angeles County
Metropolitan Transportation Authority**

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

213.244.7300 Tel

DATE: June 3, 2025

TO: Kenneth Hernandez
Chief Transit Safety Officer (Interim)

FROM: Yvonne Zheng, Sr. Manager, Audit

**E-SIGNED by Yvonne Zheng
on 2025-06-03 19:15:40 PDT**

SUBJECT: Final Report on Metro Transit Security Performance Audit for
Fiscal Years 2023 and 2024 (Report No. 25-AUD-06)

The Office of the Inspector General (OIG) hired the consultant firm BCA Watson Rice LLP to conduct an audit on the performance of Metro's System Security & Law Enforcement (SSLE) Department and the three contracted law enforcement agencies during FY 2023 and FY 2024 (July 1, 2022, to June 30, 2024). Since 2009, Metro has had a contract with the Los Angeles County Sheriff's Department (LASD) to provide Metro with transit policing services. Beginning July 1, 2017, Metro implemented a new transit security strategy, which includes obtaining services from three law enforcement agencies – the City of Los Angeles Police Department (LAPD), the City of Long Beach Police Department (LBPD), and the Los Angeles County Sheriff's Department (LASD).

The Metro Board passed a motion directing the Office of the Inspector General (OIG) to annually audit each law enforcement services contract to determine how key performance indicators measure up against actual performance metrics. The audit for Fiscal Years 2023 and 2024 covered the following areas:

- A. Visibility of Law Enforcement Security Personnel;
- B. Supplemental Law Enforcement Services such as Enhanced Deployments and Special Events;
- C. Billing, Payments, and Use of Budgeted Funds for each Law Enforcement Contract;
- D. Proactive Crime Policing Efforts and Adherence to the Principles of Campaign Zero's "Eight Can't Wait"/Use of Force;
- E. Metro System Security and Law Enforcement (SSLE) Department Non-law Enforcement Personnel and Activities; and
- F. Follow-Up on Prior Audit Recommendations.



Metro

**Los Angeles County
Metropolitan Transportation Authority**

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

213.244.7300 Tel

OVERALL AUDIT CONCLUSIONS

While there have been improvements in compliance and oversight over time, this report notes several continuing issues of concern relating to reporting and contract oversight, as well as issues related to Contractor billings. Below is a summary of the more significant findings.

- SSLE has not established baselines for the KPIs set forth in the Agreements to define acceptable levels of visibility on the system by the law enforcement agencies. However, during the audit period, SSLE established a practice of conducting weekly meetings to review and collaboratively adjust deployment strategies for each of the agencies. These weekly meetings have allowed Metro to more effectively impact deployments to promote visibility on the system. Visibility data should still be collected and evaluated, but deployment strategies should be developed based on existing trends as well as overall visibility goals.
- SSLE cannot objectively validate the visibility of law enforcement deputies on the system. While LASD has developed a GPS system to report their deputies' locations and activities, SSLE lacks the ability to independently verify the accuracy of the reported information.
- Based on our testing of 3 monthly invoices for FY23, each for LASD, LAPD, and LBPd, we found instances of billings non-compliance with the respective law enforcement contract agreements.

Our review identified 34 findings and made 24 recommendations. Details of these findings and recommendations are included in the detailed results section of this report.

We appreciate the assistance provided by Metro staff during this review. If you have any questions, please contact Karen Gorman, Inspector General, at GORMANK@metro.net or me at ZhengY@metro.net. Thank you!

Enclosure: Final Report

CC:

LA Metro

Robert Gummer
Nicole Englund
Stephanie Wiggins

LASD

Chief Luna
Captain Shawn Kehoe
Lt. Brian Jones

LAPD

Chief McDonnell
Deputy Chief Don Graham
Commander Natalie Cortez
Captain Alex Baez

LBPd

Chief Wally Hebeish
Lt. Abram Yap

LA Metro
Office of the Inspector General

Transit Security Services Performance Review
Fiscal Years 2023 and 2024

May 2025

FINAL REPORT

Submitted by:

BCA Watson Rice LLP

Certified Public Accountants & Management Advisors
2355 Crenshaw Blvd. Suite 150 Torrance, CA 90501
PH 310 . 792 . 4640 . FX 310 . 792 4140 .

Table of Contents

	<u>Page</u>
A. Executive Summary	1
B. Background.....	13
C. Objectives, Scope and Methodology	13
D. Detailed Audit Results.....	14
Appendix: FY2023-24 Schedule of Recommendations and Proposed Actions	89

1. Executive Summary

Introduction and Objectives

The Los Angeles County Metropolitan Transportation Authority (Metro) is the region's principal agency for multi-modal transit operations. In 2017, Metro awarded three separate contracts ("Agreements") to the Los Angeles Police Department (LAPD), the Los Angeles County Sheriff's Department (LASD), and the Long Beach Police Department (LBPD) ("Contractors") for transit law enforcement services to support day-to-day operations across Metro's entire service area. These Agreements have been modified several times, and the most recent modification occurred in June 2023. The objective of this audit is to verify contract performance and compliance for transit security function services for all three law enforcement agencies during FY 2023 and FY 2024 (July 1, 2022, to June 30, 2024).

The specific review areas covered by this audit include:

- A. Visibility of Law Enforcement Security Personnel
- B. Supplemental Law Enforcement Services such as Enhanced Deployments and Special Events
- C. Billing, Payments, and Use of Budgeted Funds for each Law Enforcement Contract
- D. Proactive Crime Policing Efforts and Adherence to the Principles of Campaign Zero's "Eight Can't Wait"/Use of Force
- E. Metro System Security and Law Enforcement (SSLE) Department Non-law Enforcement Personnel and Activities
- F. Follow-Up on Prior Audit Recommendations

Metro's Office of the Inspector General ("OIG") conducts an annual audit of the Agreements to review compliance with the terms of the contract and to ensure adequate oversight of the Agreements by Metro's Safety, Security and Law Enforcement (SSLE) Department. While there have been improvements in compliance and oversight over time, this report notes several continuing issues of concern relating to reporting and contract oversight, as well as issues related to Contractor billings. Below is a summary of the more significant findings. Details of these significant findings and other report findings are included in the detailed results section of this report.

- SSLE has not established baselines for the KPIs set forth in the Agreements to define acceptable levels of visibility on the system by the law enforcement agencies. However, during the audit period, SSLE established a practice of conducting weekly meetings to review and collaboratively adjust deployment strategies for each of the agencies. These weekly meetings have allowed Metro to more effectively impact deployments to promote

visibility on the system. Visibility data should still be collected and evaluated, but deployment strategies should be developed based on existing trends as well as overall visibility goals.

- SSLE cannot objectively validate the visibility of law enforcement deputies on the system. While LASD has developed a GPS system to report their deputies' locations and activities, SSLE lacks the ability to independently verify the accuracy of the reported information.
- Based on our FY23 testing of 3 monthly invoices each for LASD, LAPD, and LBPD, we found instances of billings non-compliance with the respective law enforcement contract agreements.

Below we provide a summary of the more significant audit issues and recommendations by task. A more detailed discussion by task is included in the body of this report beginning on page 14.

Task A: Visibility of Contract Law Enforcement Personnel

A visible security presence is an important policy strategy to deter criminal activity and provide a sense of safety for Metro customers and staff especially in areas used frequently by Metro staff including boarding areas of buses and trains, on-board the buses and trains, and public parking areas. A key strategy to ensuring a visible presence is to provide active oversight and management of Metro's contracted law enforcement operations. Within the initial Agreements, Metro developed performance metrics to be tracked and reported monthly including those related to bus/rail boardings, and the number of foot and vehicle patrols at Metro transit centers and stations. SSLE is primarily responsible for the collection of this data and management and oversight of the law enforcement agencies' performance. In addition to evaluating metrics related to visibility, SSLE has established the practice of weekly meetings with the agencies to review current trends on the system and collaboratively decide on deployment strategies.

This section: (1) presents the key metrics used by SSLE to measure visibility on the system and (2) evaluates whether the foregoing metrics and oversight strategies provide a meaningful basis for assessing whether the law enforcement agencies have sufficient visibility on the system.

Key Metrics

This audit reviewed and verified reported efforts to provide visible law enforcement and security personnel throughout the Metro system to identify the locations and visibility of contracted law enforcement reported by month and compare them to established baselines. During the audit period, however, SSLE did not receive all the data needed to adequately evaluate and validate visibility. For example, for rail boardings, neither LAPD nor LASD reported data for FY2023. Additionally, the data reporting by LBPD was based on estimates of activity levels and not based

on GPS information, or some other methodology that reflects what resources are in fact deployed.

Recommendation: SSLE should require the law enforcement agencies to report all data required by the Agreements, instruct on the format and frequency of the expected reporting, and develop an agreed methodology as to how that data is to be collected and provided. This recommendation is consistent with recommendations made in prior reports.

Law Enforcement Visibility on the System

Visibility of law enforcement on the system is critical to deter criminal activity and provide Metro customers and staff with confidence in the safety of the system. SSLE has made significant advancements in how resources are deployed to provide greater levels of visibility (and increased security) on the system. In July 2023, SSLE implemented a new approach for resource deployment entitled the “Multi-Layer Planned Deployment.” This approach establishes a multi-layered deployment of resources to address emerging safety and security issues on the system. The plan uses real-time data to recognize “hot spots” for criminal activity on the system. In addition, SSLE has also employed a more comprehensive approach to safety and security on the system with the development of its FY24 Annual Workplan, designed to improve safety and security on the system, improve communication, create a culture of safety, and create a shared common operating picture.

Recommendation: SSLE should continue to refine its multi-layered deployment approach and establish metrics to allow for a more routine and objective means of evaluating law enforcement’s visibility on the system.

Developing strategies is the first step towards defining appropriate visibility. To evaluate the success of these strategies, SSLE needs the tools to evaluate success by establishing objective baselines for compliance. Baselines provide quantifiable benchmarks against which to assess progress that would allow SSLE to identify areas for improvement, hold the agencies accountable for results, and ultimately drive overall performance. Without baselines, it's difficult to gauge whether performance is adequate or not and where to direct improvement initiatives.

SSLE has not established baselines for Key Performance Indicators (KPIs) that were designed to help evaluate the law enforcement agencies’ visible presence on the system. However, SSLE does meet with the law enforcement agencies on a weekly basis to develop deployment strategies based on existing system trends. These weekly meetings help SSLE establish expectations for greater law enforcement visibility on the system and the ability to hold the agencies accountable. It is important, however, for SSLE to collect and analyze data from the law enforcement agencies on KPIs related to visibility and establish “baselines” for visibility.

Recommendation: SSLE should work with the law enforcement agencies to develop baselines for the level of visible presence and activity provided by contract law

enforcement personnel on the Metro system as part of an overall policing and accountability strategy. These baselines can and should evolve over time with changes made to deployment strategies but should provide the law enforcement agencies with an expected level of activity for each key task. This recommendation is consistent with recommendations made in prior reports.

A top priority for SSLE should be the monitoring of the law enforcement's personnel to ensure they are present and providing the service Metro is paying for. Over the past several years, Metro has had difficulty monitoring law enforcement personnel assigned to Metro to ensure they are, in fact, present and visible. Currently, SSLE primarily relies on three means of verifying that law enforcement agencies are in fact deployed: review of weekly deployment sheets, in-person field reviews, and review of CCTV footage. Each of the foregoing methods of verifying the agencies' security presence has limited efficacy or are costly. As a result, SSLE currently does not have a viable, cost-effective means to routinely and independently verify the law enforcement agencies' actual presence on the system. This lack of comprehensive monitoring and oversight mechanism limits the ability of Metro to ensure that the law enforcement agencies are maintaining appropriate levels of visibility on the system.

Recommendation: SSLE should continue to work with the law enforcement agencies to develop tools to be more efficient and cost-effective means to validate presence and activity on the Metro system. This recommendation is consistent with recommendations made in prior reports.

Finally, LASD has developed a new system to track and report on tasks performed by their deputies on the system. In July 2023, LASD implemented the Deputy Activity Log (DAL), a geolocation tool that is used to monitor the activities and location of its deputies. When a deputy begins a new task, that deputy makes an entry on a mobile phone indicating what activity is being performed (e.g., bus and train boardings, train rides, and patrol checks of platforms, parking structures, and bus and rail yards. etc.). This entry creates a pin within the system showing the deputy's location. LASD sends detailed information to SSLE about its activities on a weekly basis, that is a comprehensive look at the activities conducted by its deputies. While this information is critical to understanding the nature of the services being provided, it does not allow SSLE to independently validate the accuracy of the information provided. SSLE does not have direct access to the data within the database to conduct verification audits about the reported activities and the locations of deputies during their shifts. If SSLE had direct access to the data, it would likely be unnecessary for SSLE to conduct in-person or visual audits of deputy activities as it currently is required to do.

Recommendation: SSLE should work with LASD to identify a potential, cost-effective solution that would provide Metro access to DAL data in a format that would allow it to independently validate LASD deputy's visibility on the system. SSLE should also

evaluate whether the DAL system could be replicated by the other law enforcement agencies.

Task B: Supplemental Law Enforcement Services Performed by LAPD and LASD

Supplemental services are generally used where there are increased threat levels, special events, the need for crime suppression, or other exigent circumstances necessitating the deployment of additional resources above and beyond the budgeted personnel. These supplemental services fall into two general categories: Enhanced Services (providing additional personnel to deliver a heightened level of presence on the transit system) and Special Events (providing additional staffing to address one-time or short-term events such as concerts, sporting events, protests, etc.). When supplemental resources are required, Metro makes a request for additional services to the law enforcement agencies, and a deployment strategy is set.

LAPD provided and billed for Supplemental Services during the audit period. LAPD's billings were largely for Enhanced Services related to various "surge" efforts by Metro in responses to spikes in criminal activities on the system. LAPD also provided additional staffing for Special Events related to the Dodger Stadium Express.

During the audit period, LASD only billed Metro for Enhanced Services in FY24. These supplemental services were related to surge activity in December of 2023 and May of 2024. LASD also provided supplemental services for special events ranging from concerts, the removal of homeless encampments, and security at NFL games. However, LASD did not charge Metro for services associated with special events.

Task C: Billing, Payments and Use of Budgeted Funds for Each Law Enforcement Contract

We reviewed the budget and billings for each of the law enforcement agencies to identify the nature and scope of budget variances. To accomplish this objective, we obtained, reviewed, and evaluated the Fiscal Year 2023 budgets, billings, and payments for each law enforcement agency, and verified by sample testing of monthly invoices that each of the three law enforcement agency billings complied with their respective contract sections regarding billings for services. **(Note: Each law enforcement agency provided their responses to each of the findings for this task, and their responses are included in the body of this report).**

LASD Contract Budget and Billings Compliance

On July 27, 2022, Metro approved LASD's law enforcement contract authorization for FY 2023 for an estimated total annual cost of \$72,215,510. For FY 2023, the total amount billed and paid

to LASD was \$71,224,705. Thus, the total amount billed and paid to LASD for FY 2023 did not exceed the contract authorization amount.

Based on our sample testing of three-monthly invoices for FY 2023, we found that the daily target minutes that LASD used in the calculation of the credit amount due to Metro were erroneous, resulting in an understatement of the credit amount due to Metro for the three invoices tested.

According to LASD, the differences in the daily target minutes used were based on revised deployment models.

Recommendation: We recommend that LASD collaborate with Metro's SSLE Department to review Fiscal Year 2023 invoices to ensure that all calculations align with the revised deployment models. Metro's SSLE Department should review the remaining FY 2023 invoices not tested and calculate the additional credit amount owed by LASD to Metro, if any.

LAPD Contract Budget and Billings Compliance

The total amount billed and paid to LAPD for FY 2023 exceeded the contract amount by \$8,145,232. For FY 2023, the contract amount approved under Modification No. 6 and 7 totaled \$82,506,245. The total amount billed and paid to LAPD was \$90,651,477 which exceeded the contract authorized amount by \$8,145,232.

Based on our sample testing of three-monthly invoices for FY 2023, we found LAPD was not in compliance with the contract requirement regarding the submission of the List of Maximum Fully Burdened Hourly Rates. Also, the CAP 41 indirect cost rates used by LAPD to bill Metro were not current, resulting in an overbilling of \$370,705.16. In addition, four of LAPD's labor classifications totaling \$99,476.61 on three sample invoices were not found on Metro's approved List of Maximum Fully Burdened Hourly Rates. Lastly, labor hours billed were found to be higher than the Weekly Deployment Reports for 2 out of 3 sample invoices for a total credit due of \$1,831.74 for 3 months of FY23.

Recommendation: Metro should apply a credit for the overbilling amounts detailed above for \$472,013.51. Metro's SSLE Department should review the remaining FY 2023 invoices not tested and calculate the additional refund owed by LAPD to Metro.

LBPD Contract Budget and Billings Compliance

The total amount billed and paid to LBPD for FY 2023 exceeded the contract amount by \$933,043. For FY 2023, the contract amount approved under Modification No. 7 and 8 totaled \$7,128,219. The total amount billed and paid to LBPD for FY 2023 was \$8,061,262 which exceeded the contract authorized amount by \$933,043.

Based on our sample testing of three-monthly invoices for FY 2023, we found LBPD Paid Time Off (PTO) accrual hours billed to Metro totaling \$195,116.96 was unallowable under Contract

Modification No. 2. Also, PTO accrual hours were found to be billed twice. Additionally, discrepancies were found between the labor hours and amounts billed in the Work Hour Detail Schedule and LBPDP Daily Metro Cost Reports, resulting in an overbilled amount of \$19,820.26. Lastly, some Other Direct Costs (ODC) totaling \$166,615.20 billed were not adequately supported nor allowed by the contract.

Recommendation: Metro should apply a credit of \$381,552.42 for the overbilling amounts detailed above. Metro's SSLE Department should review the remaining FY 2023 invoices not tested and calculate the additional refund owed by LBPDP to Metro.

Task D: Proactive Crime Policing Efforts, Principles of Campaign Zero's "Eight Can't Wait"/Use of Force

This section reviews the proactive crime policing efforts of LAPDP, LASDP and LBPDP as well as evaluates whether their practices and policies are consistent with the principles of Campaign Zero's "Eight Can't Wait." The audit reviewed the law enforcement agencies' proactive crime policing policies and evaluated whether their programs are tailored to adapt to the modern transit policing environment. We also reviewed a sampling of the contracted agencies' use of force reports to determine whether their actions were consistent with the principles of Campaign Zero's "Eight Can't Wait."

Proactive Crime Policing Policies and Practices

Proactive policing is the practice of preventing criminal activity before it happens. It includes activities such as ensuring a visible use of police presence and adopting effective public engagement. SSLE and the law enforcement agencies have prioritized three key strategies during the audit period to enhance their proactive policing programs. First, the agencies are providing greater visibility on the system through a coordinated multi-layered deployment approach. Second, the agencies have been trained and have policies to prevent and respond to emergencies and extreme events. And third, the agencies are implementing community policing efforts as part of their transit services.

These proactive policing strategies have been augmented by temporary increases in LAPDP and LASDP's staffing levels as part of a system-wide law enforcement "surge." The goal of the surge was to increase the visibility of officers to reduce crime on the system and provide a safer environment for riders. Given the importance of providing a visible presence on the Metro system, periodic surges of law enforcement presence have had a positive impact on the overall safety on the system. This increased visibility has been aided by increased coordination between the law enforcement agencies and Metro Transit security, facilitated by SSLE.

Recommendation: Due to the success of the surge in reducing criminal activity on the system, Metro should consider conducting periodic surge activities. These enhanced

deployments can have a significant and prolonged impact on crime, as well as the public's perception of safety, even after the surge has concluded.

Metro should also consider developing and collecting data on the effectiveness of the law enforcement agencies' community-based policing efforts. Such metrics could include survey data from customers and Metro staff, and the number of community events each agency participates in related to transit services.

Law Enforcement Programs Tailored to Transit Environment

SSLE has developed a process to work with the law enforcement agencies and any other of its assets to provide a more tailored and coordinated presence on the transit system. SSLE identified four key strategies for assessing security needs on the system and identifying effective deployment strategies:

- ***Strategic Coverage*** – providing strategic coverage using flexible staff and roving teams of officers to ensure coverage of all areas of the Metro system and ensure a highly visible presence for customers.
- ***Targeted Deployment*** – targeting deployments to focus on high-crime areas, especially those areas experiencing high numbers of drug-related offenses and Code of Conduct violations help reduce criminal activity.
- ***Public and Community Engagement*** – conducting regular engagement with the public to fostering public trust, build relationships and gather valuable feedback on safety concerns on the system.
- ***Training for Emergencies and High Stress Situations*** – training on a regular basis to improve how officers respond to overdoses, medical emergencies, and other high-stress incidents.

Working with SSLE, the law enforcement agencies have expanded their use of data to tailor their services more effectively to deter crime. SSLE and law enforcement then use this data to assign deployments to address these “pain point” areas.

Law Enforcement Agencies' Consistency with the Principles of “Eight Can't Wait”

In June of 2023, LAPD, LASD and LBPD amended their agreements with Metro to include language that each agencies' policing activities would be consistent with the principles of “Eight Can't Wait.” The “Eight Can't Wait” principles developed by Campaign Zero advocates for law enforcement agencies to adopt eight reforms designed to reduce police violence. To evaluate whether the agencies follow these principles, this audit reviewed their existing policies and a sampling of use of force reports to confirm that those policies are being applied in practice.

We found each of the law enforcement agencies have policies and directives that are consistent with the principles of “Eight Can’t Wait.” These policies are documented for each agency alongside each of the eight principles.

Requests were made from each law enforcement agency to provide access to their use of force reports for incidents that occurred on Metro’s system during the audit period. This request was made consistent with the contractual requirement that the agencies provide Metro with relevant documentation related to the provision of their services. The following is a summary of the findings by each law enforcement agency:

Los Angeles Police Department

For the calendar year 2023 and approximately the first three quarters of calendar year 2024, LAPD recorded 162 Use of Force transit related incidents. Overall, the use of force incidents primarily occurred on the rail system (82%) with a smaller percentage occurring on buses or other locations (18%). In a sample review of ten use of force reports that occurred during the audit period, the files displayed a consistent application of the related use of force policies that contain the principles of “Eight Can’t Wait.”

Long Beach Police Department

For the audit period, LBPD reported 2 use of force incidents. We reviewed both use of force reports to evaluate compliance with the principles of “Eight Can’t Wait.” In both incidents, the use of force reports appeared to be consistent to the “Eight Can’t Wait” principles.

Los Angeles Sheriff’s Department

For the audit period, LAPD recorded 142 Use of Force transit related incidents. In a sample review of ten use of force reports that occurred during the audit period, the files displayed a consistent application of the related use of force policies that contain the principles of “Eight Can’t Wait.”

Recommendation: SSLE should annually conduct a sample review of use of force reports prepared by the law enforcement agencies to review whether the agencies’ practice comply with the principles of “Eight Can’t Wait.”

Task E: Metro System Security and Law Enforcement Department Non-Law Enforcement Personnel and Activities

Metro’s System Security and Law Enforcement (SSLE) Department is charged with the ongoing oversight of the contracted law enforcement services as well as the operations of other Metro safety and security resources. The purpose of this task is to review and evaluate oversight and supervision of contracted law enforcement services and document how additional safety and

security resources compliment those services. To accomplish this, we performed the following analyses:

- Evaluated the adequacy of SSLE's oversight of the law enforcement services contracts to ensure compliance with contract requirements.
- Documented what non-law enforcement services SSLE utilizes to address other safety and security issues facing Metro and whether those services appear to be addressing the needs of the agency.
- Considered whether the non-law enforcement supplemental services support law enforcement and address the safety and security issues facing Metro.

SSLE Oversight of Law Enforcement Services Contracts

SSLE is responsible for the monitoring and oversight of the law enforcement contracts on behalf of Metro. This oversight is to confirm that contractual requirements are being complied with and ensure that the law enforcement agencies are providing a visible presence on the system. SSLE has implemented a new approach for how it deploys resources on the system entitled the "Multi-Layer Planned Deployment." The approach establishes a multi-layered deployment of resources to address emerging safety and security issues on the system. In addition to this multi-layered approach, SSLE developed a more comprehensive set of strategies to address safety and security concerns on this system through its FY24 Annual Workplan (FY24 Workplan). The FY24 Workplan builds on the multi-layered approach and applies similar principles throughout the entire system.

A critical element of SSLE's monitoring and oversight of the law enforcement agencies is focused on ensuring law enforcement personnel are on the system as assigned. While the implementation of the multi-layered approach has meaningfully improved SSLE's coordination of its safety and security resources, SSLE still has not developed an effective system for collecting KPI data from the law enforcement agencies. Some of the data collected represents estimated staffing based on scheduling data, not data based on actual deployments. Moreover, SSLE has not developed specific baselines for those KPIs to establish quantifiable expectations and hold the law enforcement agencies accountable to meeting those baselines.

Recommendation: SSLE should collect data on each of the KPIs listed in the law enforcement contracts. Measurements should be based on actual numbers, not estimates associated with scheduled personnel assignments.

SSLE should also develop annual baselines for the KPIs set forth in the law enforcement contracts. At a minimum, this should include baselines for key visibility KPIs including rail and bus rides, vehicle patrols and foot patrols. These baselines can and should be adjustable based on changes in deployments or changes in strategic focus.

Document Non-Law Enforcement Services Utilized by SSLE to Address Safety and Security on the System

SSLE is tasked with implementing Metro's public safety mission statement to "safeguard the transit community by taking a holistic, equitable, and welcoming approach to public safety." As part of their roles and responsibilities they provide an oversight of a multifaceted deployment of resources that include the following: Contract Law Enforcement, Metro Ambassadors, Metro Transit Security (MTS), Contract Security and Homeless Outreach Teams.

As identified above, in July 2023, SSLE sought to refine the way in which these resources were deployed by developing an approach entitled the "Multi-Layer Planned Deployment". The goal of this approach is to deliver a cost-effective, multidisciplinary set of resources that provide enhanced coverage and visibility to deter crime and give riders and Metro staff a greater sense of safety and security. The approach emphasizes employing the most effective resource based on the nature of the task and deploying enhanced resources to areas at higher risk for criminal activity. Teams utilizing each of the above resources are deployed in the following categories: End of the Line Stations, Focus Stations, Riding Teams, and Station Rovers.

This multi-layered approach has the advantage of increasing visibility on the system in a more cost-effective manner than solely using the law enforcement agencies. By using resources from MTS, Contract Security, Ambassadors and Homeless Outreach services, Metro can significantly reduce the hourly costs associated with establishing an additional presence on the system. In determining how to best deploy its resources, SSLE looks to balance several variables including the cost of service, its appropriateness for the task at hand, and the effectiveness of each deployment.

Recommendation: SSLE should continue to evaluate the ability to make use of Contract Security, MTS and Ambassadors to enhance overall safety and security presence on the system in a more cost-effective and customer-friendly manner.

SSLE should also establish baselines for the KPIs tracked by Contract Security, MTS and Ambassadors to define their responsibilities, but also hold those units accountable.

Task F: Follow-Up on Prior Audit Recommendations

The Metro Transit Security Services Performance Audit for FY21 and FY22 identified various issues and made 14 recommendations to enhance performance efficiency and effectiveness in transit security areas. To follow up on these prior audit recommendations this audit reviewed the FY21 and FY22 Transit Security Performance audit recommendations and contacted SSLE, LAPD, LASD, and LBPD to verify the status of the corrective actions taken.

As detailed on page 82 of this report, 3 recommendations were not implemented, 3 recommendations were partially implemented and 8 were deemed implemented.

2. Background

Metro is the region's principal agency for multi-modal transit operations. Metro operates transit service from eleven (11) geographically distinct bus divisions, four light rail lines, and two subway lines. In addition, critical rail infrastructure includes Union Station, 7th Street/Metro Center, and Willowbrook/Rosa Parks Station. Critical bus infrastructure includes the Harbor/Gateway Station and El Monte Transit Center.

In 2017, Metro awarded three separate 5-year firm fixed unit rate contracts to the LAPD, the LASD, and the LBPD ("Contractors") for transit law enforcement services to support day-to-day operations across Metro's entire service area.

In addition to contract transit law enforcement services, Metro's SSLE Department employs Contract Security, Metro Transit Security Officers (MTS), Metro Ambassadors, and Homeless Outreach staff who all assist in providing safety and security for the Metro system.

3. Objectives, Scope and Methodology

The overall objective of this audit is to evaluate transit security services performance provided by each of the three law enforcement contractors (LAPD, LASD, and LBPD), and Metro's System Security and Law Enforcement (SSLE) Department during FY 2023 and FY 2024.

The specific review areas covered by this audit include:

- A. Visibility of Law Enforcement Security Personnel
- B. Supplemental Law Enforcement Services such as Enhanced Deployments and Special Events
- C. Billing, Payments, and Use of Budgeted Funds for each Law Enforcement Contract
- D. Proactive Crime Policing Efforts and Adherence to the Principles of Campaign Zero's "Eight Can't Wait"/Use of Force
- E. Metro System Security and Law Enforcement (SSLE) Department Non-law Enforcement Personnel and Activities
- F. Follow-Up on Prior Audit Recommendations

The methodology used to complete this audit is described in each section of this report.

4. Detailed Review Results

The following sections provide information on the detailed results of the performance audit of Metro's transit security function.

A. Visibility of Contract Law Enforcement Personnel

In 2017, Metro awarded three separate fixed unit rate contracts to the Los Angeles Police Department (LAPD), the Los Angeles County Sheriff's Department (LASD), and the Long Beach Police Department (LBPD) (collectively the "Contractors") for transit law enforcement services to support day-to-day operations across Metro's entire service area (the "Agreements"). We evaluated Metro's management and oversight of the law enforcement agencies' effectiveness in providing a visible presence to deter crime and code of conduct violations on the system.

A visible security presence is an important policy strategy to deter criminal activity and provide a sense of safety for Metro customers and staff. A visible presence is especially important in areas frequented by passengers and Metro staff, including boarding areas of buses and trains, on-board the buses and trains, and public parking areas.

A key strategy to ensuring a visible presence is to provide active oversight and management of Metro's contracted law enforcement operations. To help evaluate the visibility of the law enforcement agencies on the system, Metro developed performance metrics to be tracked and reported monthly including those related to bus/rail boardings, and the number of foot and vehicles patrol at Metro transit centers and stations (see Reporting Requirements, Section 2.2. of the Agreements). The Safety, Security and Law Enforcement (SSLE) Department is primarily responsible for the collection of this data and the management and oversight of the law enforcement agencies' performance.

This section: (1) presents the key metrics used by SSLE to measure visibility on the system and (2) evaluates whether the foregoing metrics and oversight strategies utilized by SSLE provide a meaningful basis for assessing whether each of the law enforcement agencies have sufficient visibility on the system.

Review of Metrics for Visibility on Metro's System

The objective of this task is to review and verify reported efforts to provide visible law enforcement and security personnel throughout the Metro system. Specifically, the objective is to identify the locations and visibility of contracted law enforcement reported by month and compare them to established metrics including:

- Train boardings/rides, number of boardings and hours.
- Bus boardings/rides, number of boardings and hours.
- Foot patrols of transit centers and train stations and platforms, number of hours.

- Vehicle patrols, number of vehicle hours.
- Parking lots patrolled by the law enforcement agencies and by SSLE.
- Number of people escorted off Metro properties at Metro's request.

It is relevant to note that the law enforcement agencies provide several metrics not listed above that are meaningful in evaluating their overall performance. However, the scope of our audit was limited to review and reporting of the above KPIs.

Train Boardings/Rides

Train boardings and rides have been identified as a critical visibility tool for law enforcement on the rail system. Visibility provides both a deterrent to crime and provides Metro operators and customers with confidence in the system's safety. Metro's rail system includes 109 miles of service that includes 2 heavy rail lines, 4 light rail lines and 119 rail stations. In FY24, the Metro rail service provided over 1.19 million hours of service while travelling over 23.6 million miles. Table 1 below shows the Metro Rail and Busway system with responsibility for enforcement by law enforcement agencies.

The following exhibit shows the Metro rail and bus rapid transit (BRT) system, and the stations assigned to each contracted law enforcement agency.

Table 1: Metro Rail and Busway Lines and Stations

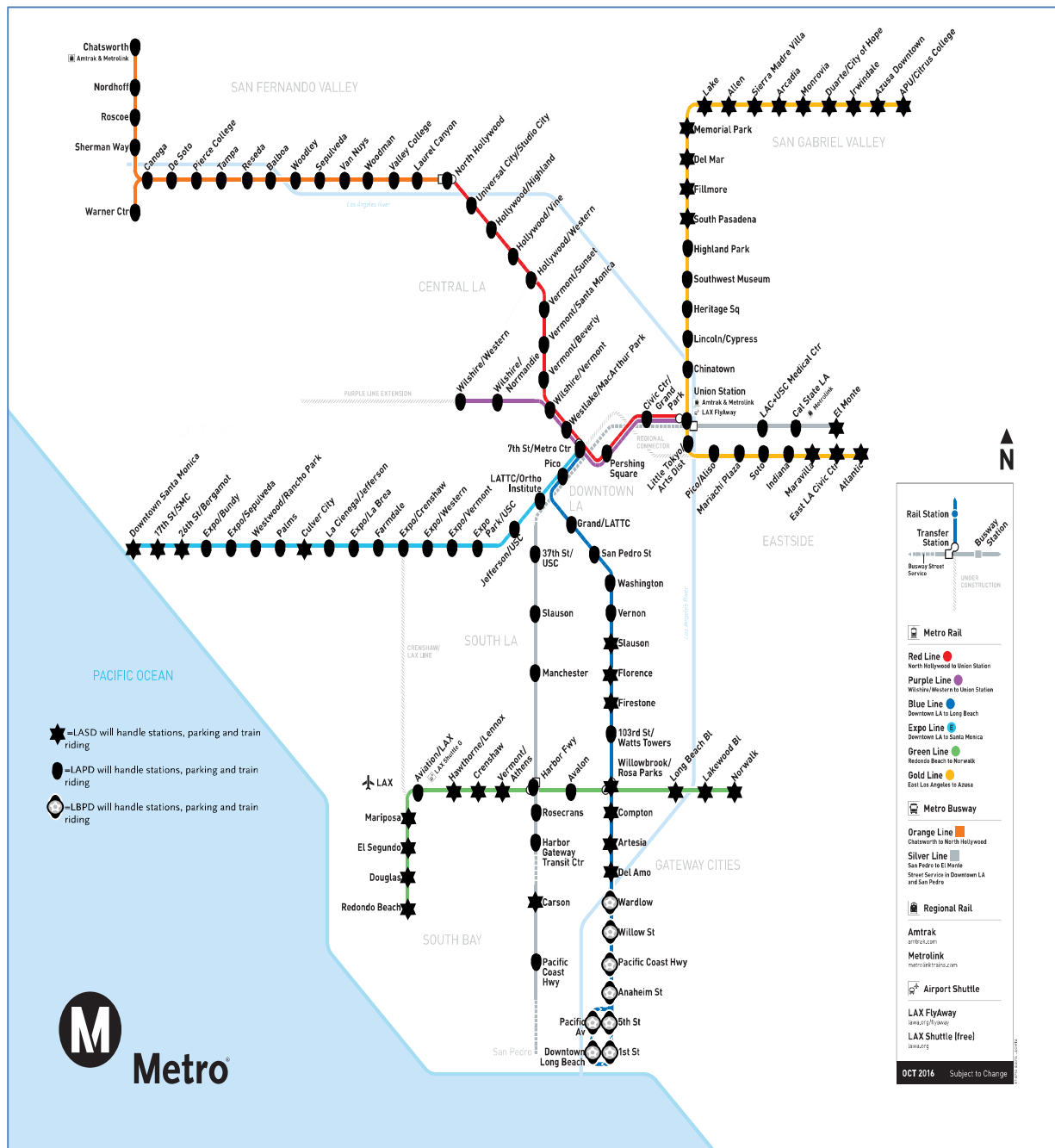


Table 2 below shows the estimated number of boardings by month for each of the law enforcement agencies. As can be seen below, LAPD did not start to report boardings and rides until April of 2024. While LAPD did provide data related to other metrics such as employee contacts, TAP inspections, and offloads off the system, these metrics are not directly related to rail boardings. LASD did not report train boarding and rides for FY23, but did provide the actual

number of boardings and rides for FY24 (for purposes of this analysis, the total was divided between the 12 months). For both FY23 and FY24, LBPd reported data that represents the estimated number of rail boardings and rides based on scheduled assignments. They do not track actual boardings and rides, contrary to contractual requirements.

Table 2: Rail Boardings by Law Enforcement Agency

Rail Boardings			
	LAPD	LASD	LBPd
Fiscal Year 2023			
July	N/A	N/A	2,015
August	N/A	N/A	2,015
September	N/A	N/A	1,950
October	N/A	N/A	2,015
November	N/A	N/A	1,950
December	N/A	N/A	2,015
January	N/A	N/A	2,015
February	N/A	N/A	1,820
March	N/A	N/A	2,015
April	N/A	N/A	1,950
May	N/A	N/A	2,015
June	N/A	N/A	1,950
Total Boardings	N/A	N/A	23,725
Fiscal Year 2024			
July	N/A	16,071	2,015
August	N/A	16,071	2,015
September	N/A	16,071	1,950
October	N/A	16,071	2,015
November	N/A	16,071	1,950
December	N/A	16,071	2,015
January	N/A	16,071	2,015
February	N/A	16,071	1,820
March	N/A	16,071	2,015
April	7,690	16,071	1,950
May	14,939	16,071	1,120
June	15,671	16,071	1,407
Total Boardings	N/A	192,854	22,287

Bus Boardings

Metro operates a fixed route bus service that covers 1,447 square miles throughout the Los Angeles region. The system includes 119 bus routes and 12,016 bus stops with buses travelling over 64 million miles annually. On an average weekday, Metro will have over 1,500 buses deployed during peak hours. Given the large number of bus lines and the vast geographic area covered, it is critical that Metro devise an approach that provides consistent visibility to mitigate safety risks and concerns on the Metro bus system. This visible security presence is needed to

provide a deterrent to criminal activity, disorder, and Customer Code of Conduct violations as well as encouraging fare compliance. This presence also provides a sense of confidence in the safety and security of the system by the riding public and Metro bus operators.

Table 3 shows the number of bus boardings by both LAPD and LASD for both FY23 and FY24 (LBPD does not provide oversight of the Metro bus system).

Table 3: Bus Boardings by Law Enforcement Agency

Bus Boardings		
	LAPD	LASD
Fiscal Year 2023		
July	17,154	4,001
August	19,652	4,275
September	22,099	3,299
October	23,645	3,503
November	23,767	3,152
December	16,800	2,459
January	15,664	2,322
February	15,835	1,979
March	11,184	1,574
April	7,587	1,319
May	5,637	864
June	N/A	1,768
Total Boardings	179,024	30,515
Fiscal Year 2024		
July	N/A	3,333
August	N/A	11,644
September	9,612	9,180
October	10,793	8,483
November	12,615	8,965
December	11,325	8,976
January	11,707	8,781
February	9,875	8,470
March	13,017	9,134
April	9,571	10,321
May	4,269	9,158
June	3,582	6,335
Total Boardings	96,366	102,780

We noted inconsistencies in the LAPD bus boarding numbers reported. Thus, it is difficult to evaluate the degree to which bus boardings and riding are being accurately tracked and reported. We discussed this data inconsistency with LAPD management, and they provided the following written response to this issue:

“There is no metric that accurately tracks time on or off the system. A better understanding of our operations is the contractual agreement the Los Angeles Police Department (LAPD) has with LA Metro. The Department has committed

officers to work exclusively on the system unless directed, such as a radio call, supervisory direction for Metro related affairs, or at the request of Metro. During a normal 9-hour day, the officers are off the system for a 45 - minute roll call, 2 - 15 - minute breaks for a total of 30 minutes, and 45 minutes for demobilization. This totals 2 hours of "off system" time and 7 hours of "on system". The only deviations would be for operational issues such as an arrest or follow-up to an off-site location for an investigation (hospital, jail, residence, etc.) There is no practice or allowance for deviation of this process without notification and approval from a supervisor, with a follow-up notification to the watch commander. This policy has been strictly enforced and adhered to during the entirety of the LAPD-LA Metro partnership. "

There is also no means to evaluate the impact of deputies' travel time on their assignments, breaks and lunch.

With respect to LASD, LASD has undertaken efforts to develop a GPS-based reporting system that allows it to develop greater ability to track both its deputies and the tasks they are performing. The LASD Daily Activity Log (DAL) was implemented in July 2023 and shows promise to provide Metro with greater ability to track boardings as well as other tasks related to visibility on the system.

Foot Patrols of Transit Centers, Train Stations and Platforms

Foot patrols are used to provide both a visible presence at transit centers, train stations and platforms. All three agencies use some form of foot patrol to provide both deterrence and enforcement. Metro's rail system has 119 stations across the county. The following are law enforcement foot patrol assignments by Metro train Line:

- Metro A Line -- 44 stations (20 by LASD, 16 by LAPD, 8 by LBPD)
- Metro B Line -- 14 stations (14 by LAPD)
- Metro C Line -- 11 (4 LAPD, 7 LASD)
- Metro D Line -- 8 (8 LAPD)
- Metro E Line -- 29 stations (22 LAPD, 7 LASD)
- Metro K Line -- 13 stations (8 LAPD, 5 LASD)

For both FY23 and FY24, LAPD and LBPD reported statistics that represent the estimated numbers of foot patrols based on protocols and schedules developed by each agency. LASD reported the estimated numbers based on scheduling for FY23 but for FY24 provided the actual number of foot patrols for the year (those numbers were divided evenly across the 12-month period for review purposes).

Table 4 shows the number of foot patrols by each law enforcement agency for both FY23 and FY24.

Table 4: Foot Patrols of Transit Centers, Train Stations and Platforms

Foot Patrols (By Hours)			
	LAPD	LASD	LBPD
Fiscal Year 2023			
July	20,664	17,520	914
August	20,664	17,520	923
September	20,664	17,520	885
October	20,664	17,520	927
November	20,664	17,520	881
December	20,664	17,520	794
January	20,664	17,520	891
February	20,664	17,520	812
March	20,664	17,520	892
April	20,664	17,520	834
May	20,664	17,520	873
June	20,664	17,520	846
Total Hours	247,968	210,240	10,472
Fiscal Year 2024			
July	20,664	13,201	846
August	20,664	13,201	861
September	20,664	13,201	860
October	20,664	13,201	849
November	20,664	13,201	787
December	20,664	13,201	797
January	20,664	13,201	863
February	20,664	13,201	829
March	20,664	13,201	878
April	20,664	13,201	810
May	20,664	13,201	827
June	20,664	13,201	789
Total Hours	247,968	158,417	9,996

Vehicle Patrols

LAPD does not have assigned vehicle patrols to the Metro system but uses existing non-system assigned patrol units to respond to calls. As a result, they are not required to report vehicle patrols as part of their metrics. LASD personnel are primarily deployed as vehicle-based units. While patrol deputies are assigned to vehicles, their personnel are required to spend some time out of their patrol vehicles and on the Metro system. LASD did not report any vehicle patrol data for FY23, but did report their annual numbers for FY24 (averaged over 12 months). LBPD has one officer assigned to provide vehicle patrols and to assist the foot patrol units. LBPD reporting is based on an estimate of patrol hours based on existing schedules. Set forth below in Table 5 are the reported vehicle patrols by agency.

Table 5: Vehicle Patrols (by Hour)

Vehicle Patrols (By Hours)			
	LAPD	LASD	LBPd
Fiscal Year 2023			
July	N/A	N/A	457
August	N/A	N/A	462
September	N/A	N/A	443
October	N/A	N/A	463
November	N/A	N/A	440
December	N/A	N/A	397
January	N/A	N/A	446
February	N/A	N/A	406
March	N/A	N/A	446
April	N/A	N/A	417
May	N/A	N/A	437
June	N/A	N/A	423
Total Hours	N/A	N/A	5,236
Fiscal Year 2024			
July	N/A	7,241	423
August	N/A	7,241	430
September	N/A	7,241	430
October	N/A	7,241	424
November	N/A	7,241	393
December	N/A	7,241	398
January	N/A	7,241	432
February	N/A	7,241	415
March	N/A	7,241	439
April	N/A	7,241	405
May	N/A	7,241	413
June	N/A	7,241	394
Total Hours	N/A	86,893	4,998

Parking Lots Patrolled by Agencies

Metro operates parking lots located on their rail and bus rapid transit lines. These parking lots are patrolled by either the law enforcement agency with jurisdiction over that station or by Metro's contract security. Set forth below in Table 6 is a listing of each of the parking lots (by line) and the agency responsible.

Table 6: Parking Lot Patrols by Agency

Parking Lot Location	Agency	Parking Lot Location	Agency
A Line		E Line	
APU/Citrus	LASD	17th St/SMC	LASD
Azusa Downtown	LASD	Expo/Bundy	LAPD
Irwindale	LASD	Expo/Sepulveda	LAPD
Duarte/City of Hope	LASD	Culver City	LASD
Arcadia	LASD	La Cienega/Jefferson	LAPD
Monrovia	LASD	Expo/Crenshaw	LAPD
Sierra Madre Villa	LASD	Indiana	LASD
Lake Avenue	LASD	Atlantic	LASD
Del Mar	LASD		
Filmore	LASD	G Line	
South Pasadena	LASD	Chatsworth	Metro
Heritage Square	LAPD	Sherman Way	Metro
Lincoln/Cypress	LAPD	Canoga	Metro
Union Station	LAPD/LASD	Pierce College	Metro
Florence	LASD	Reseda	Metro
Willowbrook/Rosa Parks	LASD	Balboa	Metro
Artesia	LASD	Sepulveda	Metro
Del Amo	LASD	Van Nuys	Metro
Wardlow	LBPB	North Hollywood	Metro
Willow St.	LBPB		
		J Line	
B Line		San Pedro/Harbor Beacon	LAPD
North Hollywood	LAPD	Pacific Coast Highway	LAPD
Universal City/Studio City	LAPD	Carson	LAPD
Westlake/MacArthur Park	LAPD	Harbor Gateway	Metro
Union Station	LAPD/LASD	Rosecrans	Metro
		Harbor Freeway	LAPD
C Line		Manchester	Metro
Norwalk	LASD	Slauson	Metro
Lakewood Bl	LASD	El Monte Station	LASD
Long Beach Bl	LASD		
Willowbrook/Rosa Parks	LASD	K Line	
Avalon	LAPD	Fairview Heights	LASD
Harbor Freeway	LAPD	El Segundo	LASD
Vermont/Athens	LAPD	Manchester	LAPD
Crenshaw	LASD	Rosecrans	LAPD
Hawthorne/Lennox	LASD	Harbor Gateway	Metro
Aviation/LAX	LAPD		
D Line			
Westlake/MacArthur Park	LAPD		
Union Station	LAPD/LASD		

While not specifically part of the scope of our analysis, a request was made for data from each agency relating to the number of parking lot patrols conducted. Patrols of the parking lots were not reported by LAPD for either FY23 or FY24. LASD did not report patrols of the parking lots for FY23, but did report that for FY24 their vehicle patrols conducted 73,079 total visits to parking lots. Metro security estimated that each parking lot under their jurisdiction was visited 1,095 times annually. Long Beach does not patrol parking lots as part of their deployment.

People Escorted Off Metro Properties at Metro's Request

Staff or other members of Metro's security team occasionally require assistance from law enforcement to remove individuals from Metro properties due to Code of Conduct violations or other concerns. The law enforcement agencies track these removals and report them monthly. Table 7 below provides the numbers for removed individuals:

Table 7: Number of Persons Escorted Off Metro Properties at Metro's Request

Number of Persons Escorted			
	LAPD	LASD	LBPB
Fiscal Year 2023			
July	7	3	0
August	7	4	0
September	1	0	0
October	9	5	0
November	18	3	0
December	14	4	0
January	27	3	1
February	15	2	0
March	55	2	0
April	385	4	0
May	122	1	0
June	46	2	0
Totals	706	33	1
Fiscal Year 2024			
July	35	10	0
August	35	5	0
September	93	5	0
October	187	9	2
November	271	0	0
December	314	3	1
January	365	5	3
February	205	5	2
March	252	6	1
April	160	4	2
May	298	4	1
June	608	1	0
Totals	2,823	57	12

Finding 1: SSLE did not receive all data related to visibility from the law enforcement agencies as required by Reporting Requirements Section 2.2 of the Agreements during the audit period. Additionally, some of the data being received was potentially inaccurate or incomplete as they were based on estimates of activity levels and not based on GPS

information, or some other methodology that reflects what resources were in fact deployed.

Recommendation 1: SSLE should require the law enforcement agencies to report all data required by the Agreements, instructed on the format and frequency of the expected reporting, and develop an agreed upon methodology as to how that data is to be collected and provided.

Law Enforcement Visibility on the System

Visibility of law enforcement on the system is critical to deter criminal activity and provide Metro customers and staff with confidence in the safety of the system. This portion of our review focuses on two aspects of the law enforcement agencies' visibility on the system:

- *Establishing Visibility on the System* -- review of how SSLE and the law enforcement agencies define acceptable levels of visibility on the system.
- *Monitoring Visibility on the System* – review of how SSLE ensures that the law enforcement agencies are accountable for the visible deployment of their personnel.

LAPD is responsible for the areas of the Metro rail and bus system within the City of Los Angeles, and the LBPd is responsible for the Metro rail system within the City of Long Beach. The LASD is responsible for the Metro rail and bus system in all other cities and unincorporated areas of Los Angeles County.

SSLE and the law enforcement agencies have made significant advancements in how resources are deployed to provide greater levels of visibility (and increased security) on the system. In July 2023, SSLE implemented a new approach for resource deployment entitled the “Multi-Layer Planned Deployment.” This approach establishes a multi-layered deployment of resources to address emerging safety and security issues on the system. The plan uses real-time data to recognize “hot spots” for criminal activity on the system. This data is then used to identify stations and lines to be targeted to provide additional resources. A coordinated deployment strategy is then developed for these targeted stations and lines employing each of SSLE’s key resources: the law enforcement agencies, Metro Ambassadors, Homeless Outreach, Metro Transit Security, and Contract Security. Deployment strategies include specific levels of staffing and activities for each of these resources.

Establishing Visibility on the System

In addition, SSLE has also employed a more comprehensive approach to safety and security on this system with the development of its FY24 Annual Workplan (FY24 Workplan). The FY24 Workplan is designed to improve safety and security on the system, improve communication capabilities, create a culture of safety, and create a shared common operating picture. The FY24 Workplan was the culmination of efforts that began in 2020 to “reimagine” safety and

security on the system and builds on the concept of a multi-layered approach described above and applies it throughout the entire system. The model intends to move away from a “prescriptive and fixed” deployment to a more “data-driven and flexible” approach.

The FY24 Workplan includes several action items including an item to maintain a “consistent presence by patrols on bus and rail system, especially at End of Line (EOL) and Focus Stations.” Assigning this role to LAPD, LASD, LBPd and Metro Transit Security, it states that success will be measured by ensuring a “daily presence” on this system with a 95% compliance with established EOL and Focus Station staffing.

Finding 2: SSLE has made significant efforts towards improving its deployment strategies to increase visibility on the system. First, SSLE is using real time data to develop its deployment strategies by identifying “hot spots” or high-risk areas of the system. Second, SSLE has adopted a multi-layered approach to its deployments by more effectively coordinating the use of each of its key assets (law enforcement agencies, Metro Transit Security, homeless outreach and contract security).

Recommendation 2: SSLE should continue to refine its multi-layer deployment approach and establish metrics to allow for a more routine and objective means of evaluating law enforcement’s visibility on the system.

Developing strategies is the first step towards defining appropriate visibility. To evaluate the success of these strategies, SSLE and the law enforcement agencies need the tools to evaluate success by establishing baselines for compliance.

As part of the Agreements between Metro and the law enforcement agencies, the agencies are required to report Key Performance Indicators (KPIs) (See Reporting Requirements, Section 2.2. of the Agreements). These KPIs include, among others, the number of foot and vehicle patrols at rail/transit stations and the number of bus and train boardings. These KPIs allow Metro to track the level of effort being employed and evaluate the law enforcement agencies’ visibility on the system.

Baselines are critical for the evaluation of KPIs. Baselines provide clear, quantifiable benchmarks against which to assess progress, allowing organizations to identify areas for improvement, hold organizations and individuals accountable for results, and ultimately drive better overall performance. Without baselines, it’s difficult to gauge whether performance is adequate or not and where to direct improvement initiatives.

During the interviews with SSLE and the law enforcement agencies, information was requested on whether baselines were established for the KPIs referenced in the Agreements and whether those KPIs were used to evaluate the visibility of contracted law enforcement personnel on the system. SSLE indicated that it has not established baselines for the KPIs and does not routinely use the KPI data that is reported to evaluate either the law enforcement agencies’ performance

or whether the system has appropriate levels of police visibility on the system. The law enforcement agencies similarly do not establish internal baselines for the KPIs identified.

Finding 3: SSLE has not established baselines for KPIs that were designed to help evaluate the law enforcement agencies' visible presence on the system. However, during the audit period, SSLE began the practices of conducting weekly meetings to establish deployment strategies for each of the agencies and other Metro safety and security assets. These weekly meetings have allowed Metro to more effectively direct and establish visibility on the system.

Recommendation 3: SSLE should work with the law enforcement agencies to develop baselines for the level of visible presence and activity provided by contract law enforcement personnel on the Metro system as part of an overall policing and accountability strategy. These baselines can and should evolve over time with changes made to deployment strategies but should provide the law enforcement agencies with a general level of expected activity for each key task.

Monitoring Visibility on the System

Monitoring of law enforcement personnel to ensure they are present and providing the service Metro is paying for should be a top priority. Over the past several years (as referenced by prior OIG audits), Metro has had difficulty monitoring law enforcement personnel assigned to Metro to ensure they are, in fact, present and visible. As discussed above, the law enforcement agencies do not always report on actual data related to visibility and, when they do, in some instances the reported data is based on estimates derived from reviewing what resources were scheduled to be deployed.

Historically, SSLE attempted to use several different methods to verify certain metrics related to visibility. For example, law enforcement personnel were issued smartphones to use as a validator for Metro users' Transit Access Pass (TAP) fare cards. These smartphones had a Mobile Phone Validator (MPV) application that law enforcement personnel used to check TAP cards for fare enforcement. The intent was to use this capability to provide a reliable and verifiable mechanism for Metro to ensure that contracted law enforcement resources were being used effectively and as planned. Unfortunately, using MPV smartphones did not prove to be an effective way to monitor and oversee contracted law enforcement personnel presence.

Beginning in May 2021, SSLE implemented TAP reviews as an alternative approach to monitoring presence on the Metro system by contract law enforcement personnel. These reviews aimed to verify law enforcement presence throughout the Metro system by using reports on the TAP system. All contract law enforcement personnel are issued unique TAP cards and are expected to use these TAP cards to record their presence throughout the system. However, the TAP system became impractical because many officers did not carry or swipe the TAP cards reliably.

Currently, SSLE primarily relies on the following three means of verifying that law enforcement agencies are deployed according to schedule.

Review of Weekly Deployment Sheets

SSLE staff reviews a sample of weekly deployment sheets for each law enforcement agency. The results are reviewed with the agencies, but no on-going report is prepared on this data. This data relies on the accuracy of the weekly deployment sheets prepared by each law enforcement agency and provides minimum independent verification of whether officers were present on the system.

In-Person Field Reviews

SSLE conducts periodic in-person field audits (approximately 60 minutes each) where the presence of law enforcement, Metro Ambassadors, Metro Transit Security and contract security (Allied Universal Security Services) are physically verified by SSLE compliance personnel. Daily findings are documented including pictures for verification. See Table 8 below for a sample report (without pictures). While this method is effective at evaluating the visibility and effectiveness of individual officers at individual stations, this method is not a cost effective means to verify visibility across the entire system.

Table 8: Sample Observation Log for In-Person Audit

Date: 06/11/2024 Time: 7:20 AM to 8:20 AM		
Trains Observed: 6	Sweeps Conducted: 6/6	Offloads: 8
•East Portal – 2 Allied, 1 Ambassadors •Tunnel – 1 Allied •West Portal – 5 Allied •West Mezzanine – No LE/SEC •East Mezzanine – 2 MTS (Pic 1) B/D Line Platform - Observed for 30 minutes (7:45 AM - 8:15 AM); 5 LAPD, 4 Allied 1st train: Allied swept and offloaded 1 person. 2nd train: Allied swept and offloaded 4 people. 3rd train: Allied swept. 4th train: Allied and LAPD swept and offloaded 1 person. 5th train: Allied swept. 6th train: Allied swept and offloaded 2 people. - LAPD and Allied were present throughout the review period. - All offloaded patrons exited the platform. - Allied was observed moving along the platform, sweeping every train car, and assisting patrons (Pic 2 and 3). - LAPD observed at the same position during the review period (Pic 4). - A loud disturbance broke out on the East Mezzanine, which required Allied to be dispatched for assistance; Allied quickly and professionally resolved the situation. - Around halfway through the review period, an irate patron approached a group of LAPD Officers and began yelling at them over a perceived slight (Pic 5). The Officers asked for his TAP card and then pointed him off the platform when it was determined he didn't have one. - A third unidentified LE/SEC group was observed on the center platform wearing Khakis and black shirts/jackets; possible LAPD SPU (Pic 6) - Overall, Allied was observed providing excellent security services, sweeping trains, engaging with customers, and offloading riders; LAPD dealt with a difficult patron well, however, they also bunched in the center platform and did not move throughout the review period.		

Review of CCTV Footage

SSLE conducts periodic reviews of field officers using Closed Circuit Televisions (CCTV). These CCTV audits (approximately 30 minutes each) review the presence of law enforcement, Metro Ambassadors, Metro Transit Security and contract security. Findings are documented including pictures for verification. See Table 9 below for a sample report (without pictures). This method is more cost effective than in-person audits; however, the sheer number of stations and officers makes the use of CCTV footage of limited use.

Table 9: Sample Observation Log Using CCTV

Target Station: APU/Citrus College		
Date: 05/28/2024	Time Observed: 4:23 PM - 4:53 PM	
Trains Observed: 4	Sweeps Conducted: 4/4	Offloads: 0
LE/SEC Observed: 3 LASD, 2 MTS, 2 Allied		
LE/SEC Compliance Allied: 2/2 (100%) LASD: 3/2 (150%) MTS: 2/2 (100%) - LASD observed bunching and stayed at same location the entirety of the review. - LASD did not conduct any sweeps, but were seen interacting with patrons and Metro employees and contractors. (Pic 1) - Allied personnel observed patrolling and sweeping all trains that arrived. (Pic 2 and 4) - MTS seen by turnstiles for a few minutes on their phones. (Pic 3) - Overall, LASD was observed bunching in the same spot for the entirety of the review period. They did not sweep train cars. Allied was observed sweeping train cars. MTS was on platform for a few minutes and left.		

Each of the foregoing methods of verifying security presence has limited effectiveness. As a result, Metro continues to be challenged to identify an effective means of monitoring and providing oversight of the law enforcement personnel to ensure they are on the system as scheduled.

Finding 4: SSLE currently does not have a viable and cost-effective means to routinely and independently verify the law enforcement agencies' actual presence on the system. This lack of comprehensive monitoring and oversight mechanism limits the ability of Metro to ensure that the law enforcement agencies are maintaining appropriate levels of visibility on the system.

Recommendation 4: SSLE should continue to work with the law enforcement agencies to develop tools to be more efficient and develop a cost-effective means to validate presence and activity on the Metro system.

LASD's Daily Activity Log

Since the last OIG law enforcement agency audit in June 2022, LASD has developed a new system to track and report on tasks performed by their deputies on the system. In July 2023, LASD implemented the Deputy Activity Log (DAL), a geolocation tool that is used to monitor the

activities and location of its deputies. When a deputy begins a new task, that deputy makes an entry on a phone indicating what activity is being performed (e.g., bus and train boardings, train rides, and patrol checks of platforms, parking structures, and bus and rail yards. etc.). This entry creates a pin within the system showing the deputy's location. The application is made available to deputies through LASD issued phones and are used by patrol deputies throughout all shifts. Table 10 below provides a sample report for the entirety of FY24 that shows the level of effort and visibility tied to specific locations. This analysis can be run showing different periods of time for each of the locations. ***It is important to note that Table 10 is meant for illustrative purposes only. Reported numbers were not verified. As the system is more fully refined by LASD, Table 10 reflects the level of detail that the DAL system can provide.***

Table 10: Sample Daily Activity Log Summary Report for FY24

Row Labels	Facility Check	Parking Lot	Platform Check	TPS Station	Train Boarding	Train Ride	Train Yard	Grand Total
Rail	448	61,011	149,143	152	139,863	52,991	6,055	409,663
17th St/SMC	5	746	2,794	3	1,090	497	68	5,203
26th St/ Bergamot	5	1,043	3,407	3	1,611	479	153	6,701
7th St/Metro Center			6			1		7
Allen	2	104	3,729		916	2,744	53	7,548
APU/Citrus College	9	2,444	5,929	3	18,115	300	110	26,910
Arcadia	3	1,162	4,435		4,984	2,818	87	13,489
Artesia	12	2,400	2,875	2	1,964	1,144	62	8,459
Atlantic	16	865	6,359		15,611	306	214	23,371
Azusa Downtown		358	1,635	6	1,462	591	42	4,094
Civic Center/Grand Park			2					2
Compton	15	1,529	3,573	3	2,718	1,763	69	9,670
Crenshaw	9	1,701	2,781	1	1,039	1,294	73	6,898
Culver City	1	127	815	1	672	308	31	1,955
Del Amo	11	2,256	2,462	1	2,967	845	94	8,636
Del Mar	4	141	2,824		1,150	1,775	41	5,935
Douglas		1,094	2,280	2	564	1,090	72	5,102
Downtown Inglewood	7	1,833	3,131	10	1,099	684	114	6,878
Downtown Santa Monica	32	2,744	9,063	6	14,075	449	232	26,601
Duarte/City of Hope	1	429	4,290	1	6,150	2,653	81	13,605
East LA Civic Center		30	1,523		386	269	42	2,250
El Segundo	2	1,530	2,850		937	1,171	89	6,579
Fairview Heights	6	1,590	2,405	6	1,061	552	90	5,710
Fillmore	6	556	3,015		3,294	1,934	67	8,872
Firestone	31	485	2,280	12	1,201	1,028	57	5,094
Florence	14	2,159	3,153	17	2,317	1,209	74	8,943
Hawthorne	1	1,148	2,527	1	1,188	1,151	76	6,092
Indiana		487	1,371		1,209	240	30	3,337
Irwindale	15	2,754	4,274	4	3,505	1,272	125	11,949
Lake	7	190	4,292		3,295	2,983	68	10,835
Lakewood Bl	10	1,759	2,472	6	933	1,372	46	6,598
Long Beach Bl	10	2,185	3,260	15	1,928	2,022	73	9,493
Maravilla		88	1,484		424	281	32	2,309
Mariposa		246	2,112	2	659	1,022	54	4,095
Memorial Park	2	102	2,747	1	1,450	1,808	35	6,145
Monrovia	3	1,072	4,339		3,319	2,618	294	11,645
Norwalk	27	7,025	6,788	6	7,276	1,000	228	22,350
Pershing Square			3					3
Redondo Beach Marine	5	2,401	3,679	1	2,959	837	208	10,090
Sierra Madre Villa	9	1,233	4,569	1	2,724	3,335	73	11,944
Stauson	9	309	1,594	5	1,269	739	60	3,985
South Pasadena	3	86	1,827	1	3,113	830	43	5,903
Union Station		9	5		2	3	1	20
Vermont	1	889	2,365		978	1,043	62	5,338
Westchester	7	962	3,963	13	2,312	616	204	8,077
Willowbrook/ Rosa Parks	118	9,927	16,862	12	15,191	3,727	614	46,451
Yard	30	813	994	7	746	188	1,714	4,492
Grand Total	448	61,011	149,143	152	139,863	52,991	6,055	409,663

To make this information more valuable to Metro, the data would need to be accessible by SSLE to validate the activities being performed by LASD. LASD sends reports to SSLE that describe the nature and level of activity being performed on the system. The data is detailed and comprehensive. By having direct access to this data, it would be unnecessary for SSLE to conduct in-person or visual audits of deputy activities as it currently is required to do to validate the activities that are being done as reported.

While daily transfers of data to SSLE may not be effective, it may be possible for Metro to explore other means of using DAL to help validate daily visibility levels. For example, LASD indicated that they can provide Metro historical information on individual deputy's activities and locations upon request. Metro may be able to use this information to conduct samplings of deputy's activities to validate the "visibility" of LASD deputies in a more comprehensive way than has been previously available.

Finding 5: LASD's DAL system implemented in July 2023 uses geo-location technology to monitor the location and activities of its deputies on a real-time basis. While this system may have the capacity to allow SSLE to independently validate LASD deputy's visibility on the system, additional technology or reporting tools will be required to allow such verification.

Recommendation 5: SSLE should work with LASD to identify a potential, cost-effective solution that would provide Metro with access to DAL data in a format that would allow it to independently validate LASD deputy's visibility on the system. SSLE should also evaluate whether the DAL system could be replicated by the other contracted law enforcement agencies.

B. Supplemental Law Enforcement Services Performed by LAPD and LASD

This portion of our audit identifies the supplemental law enforcement services provided and billed by LAPD and LASD for Fiscal Years 2023 and 2024.¹ Supplemental services are generally used where there are increased threat levels, special events, the need for crime suppression, or other exigent circumstances necessitating the deployment of additional resources above and beyond the budgeted personnel. These supplemental services fall into two general categories:

- *Enhanced Services* -- providing additional personnel to deliver a heightened level of presence on the transit system. An example of Enhanced Services includes the recent “surge” employed in FY24 with increased deployments on the transit system to provide greater ability to respond to incidents and a visible deterrence to combat criminal activity.
- *Special Events* – providing additional staffing to address one-time or short-term events such as concerts, sporting events, protests, etc. The additional staffing is to provide increased presence at the transit locations servicing the event.

When supplemental resources are needed, Metro makes a request for additional services to the law enforcement agencies, and a deployment strategy is set. Metro reimburses the agencies for the actual costs of all additional resources deployed. The process of identifying and determining deployment strategies has been aided by weekly meetings between SSLE and the law enforcement agencies instituted in FY23. At these meetings, SSLE and the agencies discuss strategic and operational issues and how to best address existing crime trends and the transit law enforcement needs for special events can be discussed.

The following is a summary of supplemental services billed by LAPD and LASD in FY23 and FY24.²

Los Angeles Police Department Supplemental Services

During the audit period, LAPD billed Metro for both Special Events and for Enhanced Services.

Special Events

LAPD provided additional staffing for Special Events in both FY23 and FY24. These Special Events were limited to staffing associated with the Dodger Stadium Express, a free service that includes a shuttle from Union Station to Dodger Stadium. No additional Special Events were billed for during the audit period.

¹ Long Beach Police Department does not provide for or bill Metro for supplemental services and, therefore, are not included in this analysis.

² As of the time of this report, not all the billings have been submitted by the law enforcement agencies for FY24. As a result, additional billings for supplemental services for FY24 will be forthcoming.

Table 11: Summary of LAPD Special Events

Summary of LAPD Special Events			
FY 2023			
Dates	Activity	Total Personnel Deployed	Cost
July 1, 2022 to June 30, 2023	Dodger Stadium Express	2 Motor Officers for 6 hour shifts	\$109,102
FY 2024			
Dates	Activity	Total Personnel Deployed	Cost
July 1, 2023 to June 30, 2024 (only partial year billings)	Dodger Stadium Express	2 Motor Officers for 6 hour shifts	\$54,018
Totals			\$163,120

Enhanced Services

Due to an increase of aggravated assaults, robberies and other criminal activities at various Metro stations beginning as early as September 2023, SSLE and LAPD developed a strategy to deploy additional officers on the system as part of an “initial” surge from September 21, 2023, to January 31, 2024. This deployment consisted of the following:

- 1 Supervisor – 10-hours shifts
- 8 Officers – 10-hour shifts
- 2 Detention Officers (Non-Sworn) – 10-hour shifts

Table 12 depicts the total number of personnel assigned to the surge detail during this period and the respective costs.

Table 12: Summary of LAPD Surge Detail September 2023-January 2024)

Surge Detail (September 21, 2023 to January 31, 2024)			
Supervisors	Officers	Detention Officers	Totals
\$31,082.20	\$224,006.20	\$25,146.00	\$280,234

This enhanced deployment featured a Multi-Layer Planned Deployment (MLPD) coordinated between SSLE and the law enforcement agencies. During the two-week period from March 4, 2024, to March 14, 2024, LAPD’s deployment from Monday to Thursday included 1 Supervisor and 8 Officers operating on 9-hours shifts. Table 13 depicts the total personnel and associated costs for the surge during this period.

Table 13: Summary of LAPD Surge Detail (March 2024)

Surge Detail (March 4, 2024 to March 14, 2024)		
Supervisors	Officers	Totals
\$6,752.34	\$51,124.86	\$57,877.20

In addition to the above enhanced deployments, on May 16, 2024, Mayor Karen Bass requested that LAPD increase its presence on the transit system by 20%. The officers involved in this additional surge were assigned to patrol trains throughout their shifts to maintain a more continuous and visible presence. This additional staffing was in effect seven days a week beginning May 17, 2024. This surge was scheduled to continue until September 2024. The total daily deployment included:

- 3 Supervisors (12-hour shift); 1 Supervisor (9-hour shift)
- 16 Officers (12-hour shift); 4 Officers (9-hour shift)
- 4 Mental Health Unit Officers (12-hour shift)
- 2 Detention Officers (12-hour shift);

Table 14 shows the staffing and costs associated for the entire length of this portion of the surge.

Table 14: Summary of LAPD Surge Detail (May 2024-September 2024)

Surge Detail (May 17, 2024 through September 20, 2024)			
Supervisors	Officers (including Mental Eval Unit)	Detention Officers	Totals
\$593,241.00	\$5,220,523.00	\$247,436.00	\$6,061,200.00

Finding 6: LAPD provided and billed for Supplemental Services during the audit period. LAPD's billings were largely for Enhanced Services related to various "surge" efforts by Metro in responses to spikes in criminal activities on the system. In addition, LAPD also provided additional staffing for Special Events related to the Dodger Stadium Express.

Los Angeles Sheriff's Department Supplemental Services

During the audit period, LASD only billed Metro for enhanced services in FY24. These supplemental services were related to surge activity in December of 2023 and May of 2024. Table 15 shows the total costs associated with surge related activities in FY24:

Table 15: LASD Surge Detail

LASD Billings for Surge Activities	
Dates	Amounts
12/16/23	\$7,248.48
05/01/24 through 05/31/24	\$89,637.39
Totals	\$96,885.87

LASD also provided supplemental services for special events ranging from concerts, the removal of homeless encampments, and security at NFL games. LASD did not charge for services

associated with special events. While LASD does provide staffing for these special events, those costs are generally assumed by LASD and, as a result, those costs are not reflected in this report.

Finding 7: LASD provided and billed for Supplemental Services during the audit period. Those billings were for Enhanced Services related to various “surge” efforts by Metro in responses to spikes in criminal activities on the system.

C. Billing, Payments and Use of Budgeted Funds for Each Law Enforcement Contract

We reviewed the budget and billings for each of the law enforcement agencies to identify the nature and scope of budget variances. To accomplish this objective, we completed the following procedures:

- Obtained, reviewed, and evaluated the Fiscal Year 2023 (FY 2023) budgets, billings, and payments for each law enforcement agency including (1) summarized budget-to-actuals for each agency and (2) identified any budget variances.
- Verified by sample testing of monthly invoices that each of the three law enforcement agency billings complied with their respective contract sections regarding billings for services.

Los Angeles County Sheriff's Department (LASD)

On September 1, 2017, Metro entered a five-year contract with LASD for a not-to-exceed amount of \$246,270,631 with a start date of September 1, 2017, and end date of June 30, 2022. This contract was subsequently modified by seven (7) modifications amending the Statement of Work, Contract Price, and Period of Performance. For FY 2023, Modification No. 6 and 7 were executed extending the performance period to June 30, 2023, and increasing the not-to-exceed total contract price to \$360,438,587. Table 16 below summarizes the amount approved up to June 30, 2023.

Table 16: LASD Contract Amounts

Description	Period of Performance	Contract Price Increase	Not-To-Exceed Contract Price
Base Contract	9/1/2017 - 6/30/2022		\$ 246,270,631
Modification No. 2		\$ 11,325,520	
Modification No. 3		32,842,679	
Modification No. 6	7/1/2022 - 12/31/2022	34,239,050	
Modification No. 7	1/1/2023 - 6/30/2023	35,760,707	
TOTAL		\$ 114,167,956	\$ 360,438,587

Finding 8: Total amount billed and paid to LASD for FY 2023 did not exceed Metro's estimated annual cost of \$72,215,510 approved on Form SH-AD 575.

According to Article IV.A of the contract agreement, Metro will pay LASD up to but not greater than the monthly pro-rata amounts of the annual Firm Fixed Unit Rate based on agreed-upon service levels set forth in the Los Angeles County Sheriff's Department SH-AD 575 Deployment of Personnel Form for each fiscal year. On July 27, 2022, Metro approved the Service Level Authorization SH-AD 575 for FY 2023 for an estimated total annual cost of \$72,215,510. For FY 2023, the total amount billed and paid to LASD was \$71,224,705. Thus, the total amount billed

and paid for FY 2023 did not exceed the estimated cost of \$72,215,510 as detailed in the schedule below.

Description	FY 2023
Estimated Total Annual Cost (SH-AD 575)	\$ 72,215,510
Billing and Payment - Actual	71,224,705
Difference	\$ 990,805

Finding 9: The daily target minutes that LASD used in the calculation of the credit amount do not meet the service levels promised on Form SH-AD 575.

According to the contract, if the daily patrol service target minutes fall below ninety-eight percent (98%) of the service level minutes promised on Form SH-AD 575, then Metro or LASD shall adjust that month's invoice for the number of service level minutes that fell short compared to the promised daily service level minutes for that month.

For FY 2023 we reviewed and sampled LASD's billing for three invoices (July 2022, December 2022, and June 2023). For each invoice, we compared the annual and monthly rates billed to the annual firm fixed rate specified on Form SH-AD 575. We found that the annual rate and monthly rate for each level of service were computed in accordance with the contract requirement. However, we found the daily target minutes that LASD used in the calculation of the credit amount do not meet the service levels promised on Form SH-AD 575.

For the days that LASD did not meet the required 98% daily patrol service minutes, LASD calculated and included a credit amount in the invoice to refund Metro. The credit amount was calculated using the daily target minutes less than the provided minutes, multiplied by the rate per minute. The daily target minutes that LASD used to calculate the credit amount changed each day ranging from 33,120 minutes to 60,000 minutes depending on the size of the rollout or staffing for that day. The minutes provided were based on the RAPS 500E rollcall sheets. For the three sample invoices tested, credit amounts of \$73,516.50 were included in the July 2022 invoice, \$1,528.64 in the December 2022 invoice, and no credit amount for the June 2023 invoice.

The contract does not specify that the daily target minutes should be based on the size of the rollout. Given that LASD bills Metro the monthly pro-rata amounts of the annual firm fixed unit rate, the daily target minutes should be based on the 19,096,800 Form SH-AD 575 annual minutes promised divided by 365 days, which equates to 52,320 daily minutes times 98%, resulting in 51,274 target minutes per day. For the days that LASD did not meet the 51,274 required daily target minutes, we calculated an additional credit amount due to Metro totaling \$1,214,247.35 for the three sample invoices.

LASD's Response:

The calculation of daily target minutes referenced appears to be based on a misinterpretation of how daily target minutes were structured and authorized during the audit period. Specifically, the audit's analysis does not account for a Metro-approved modification to the deployment model, which allowed for the redistribution of target minutes based on ridership demand, rather than adhering to a fixed, seven-day-a-week structure. This operational adjustment was authorized through written correspondence between Transit Services Bureau Captain Shawn Kehoe and then-Metro Deputy Chief Judy Gerhardt. In that correspondence, Metro approved a change in the redeployment of target minutes to align law enforcement resources more effectively with ridership patterns. While this change altered the distribution of target minutes throughout the week, the total number of contracted minutes remained unchanged. Deputy Chief Gerhardt's letter confirmed the revised deployment model would be effective from April 3, 2022, through June 30, 2022, the end of the existing contract term. However, Metro continued to reflect its acceptance of this restructured approach through its approval of subsequent Service Level Authorization forms (SH-AD 575). Accordingly, the credit amount of \$1,214,247.35 presented in the audit appears to result from a miscalculation based on outdated assumptions regarding daily target minute allocation. We respectfully submit this context for consideration and recommend that it be incorporated into any final report. LASD remains committed to transparency, accountability, and responsible contract administration. We welcome the opportunity to collaborate with Metro's SSLE Department to review the remaining FY 2023 invoices and to ensure that all calculations align with the authorized service framework.

Auditor Rejoinder:

On May 8, 2025, LASD provided two letters dated January 19, 2022, and January 31, 2022, with explanation on the change to the deployment models. Based on our review of these two letters and the details on LASD current and future deployment models, we found that the target minutes used to calculate the credit amount for Fiscal Year 2023 do not agree with the target minutes identified in the revised deployment model approved by Metro on January 31, 2022. According to the revised deployment model, LASD would provide 6,104 hours per week, which is equal to 366,240 minutes per week. However, the target minutes that LASD used to calculate the credit amount for Fiscal Year 2023 were 358,560 minutes per week. Also, if LASD used the 6,104 weekly hours approved on the revised deployment model, total annual minutes would be 19,044,480, which is less than the 19,096,800 annual minutes promised on Form SH-AD 575 for Fiscal Year 2023.

Recommendation 6: We recommend that LASD collaborate with Metro's SSLE Department to review Fiscal Year 2023 invoices to ensure that all calculations align with the authorized service framework. Also, since Metro's letter dated January 31, 2022, only confirmed approval on the revised deployment model for period from April 3, 2022,

through June 30, 2022, LASD should obtain written approval from Metro if LASD continues to use the revised deployment model after June 30, 2022.

We also recommend Metro's SSLE Department review the remaining FY 2023 invoices not tested and calculate the additional credit amount owed by LASD to Metro using our methodology detailed above.

Los Angeles Police Department (LAPD)

On March 1, 2017, Metro entered a five-year contract with LAPD for a not-to-exceed amount of \$369,330,499 with a start date of March 1, 2017, and end date of June 30, 2022. This contract was subsequently modified by seven (7) modifications amending the Statement of Work, Contract Price, and Period of Performance. For FY 2023, Modification No. 6 and 7 were executed extending the period of performance to June 30, 2023, and increasing the not-to-exceed total contract price to \$511,991,742. Table 17 below summarizes the amount approved up to June 30, 2023.

Table 17: LAPD Contract Amounts

Description	Period of Performance	Contract Price Increase	Not-To-Exceed Contract Price
Base Contract	3/1/2017 - 6/30/2022		\$ 369,330,499
Modification No. 2		\$ 21,526,518	
Modification No. 3		\$ 38,628,480	
Modification No. 6	7/1/2022 - 12/31/2022	\$ 54,000,000	
Modification No. 7	1/1/2023 - 6/30/2023	\$ 28,506,245	
TOTAL		\$ 142,661,243	\$ 511,991,742

Finding 10: The total amount billed and paid to LAPD for FY 2023 exceeded Modification No. 6 and 7 budget amounts by \$8,145,232.

For FY 2023, the contract amount approved under Modification No. 6 and 7 totaled \$82,506,245. The total amount billed and paid to LAPD was \$90,651,477 which exceeded the contract authorized amount by \$8,145,232. The schedule below summarizes the contract amount and billing and payment amount for FY 2023.

Description	FY 2023
Modification No. 6 and 7 Contract Amount	\$ 82,506,245
Billing and Payment - Actual	90,651,477
Difference	\$ (8,145,232)

Recommendation 7: LAPD should inform Metro of the amount expected to exceed the authorized costs approved under Modification No. 6 and 7 before incurring the costs, and Metro's SSLE Department should improve its monitoring of LAPD billings, payments and contract amount to ensure that costs do not exceed the contract amount.

Finding 11: LAPD was not in compliance with the contract requirement regarding the submission of the List of Maximum Fully Burdened Hourly Rates. Also, the CAP 41 indirect cost rates used by LAPD to bill Metro were not current, resulting in an overbilling of \$370,705.16.

According to the contract, ninety (90) days prior to the start of each fiscal year, LAPD is required to submit for Metro's approval, a List of Maximum Fully Burdened Hourly Rates per labor classification, together with the necessary documentation in support of the proposed rates including applicable MOUs with labor union, current payroll records, prevailing Cost Allocation Plan (CAP) rates and breakdown of estimated Division Overhead costs.

On February 18, 2021, LAPD submitted to Metro a revised lists of rates for full time (straight time) personnel and overtime personnel including the calculation of the maximum fully burdened hourly rate for each labor classification for Fiscal Year 2021. These lists were revised to reflect the application of the federally approved Indirect Cost Rates Cost Allocation Plan (CAP) 41 to direct labor rates. These rates were to be effective for deployment period from December 20, 2020, to January 16, 2021. For FY 2023, LAPD did not submit the List of Maximum Fully Burdened Hourly Rates to Metro for approval but continued to use the List of Maximum Fully Burdened Hourly Rates submitted for FY 2021. Thus, LAPD was not in compliance with the contract requirement.

In addition, we found that LAPD did not submit the required documentation (applicable MOUs with labor union, current payroll records, and current CAP rates) to Metro to support the proposed rates. LAPD continued to use CAP 41 indirect cost rates to bill Metro up to FY 2024. We searched the City of Los Angeles website and found an Intradepartmental Correspondence to the Honorable Board of Police Commissioners for each fiscal year. This report was submitted annually to comply with the Mayor's Executive Directive No. FM-3 which directs all Departments to submit annually to the City Administrative Officer a report setting forth the costs for each special service they provide.

Based on our review of the Intradepartmental Correspondence to the Honorable Board of Police Commissioners, we found that the CAP rates decreased significantly since FY 2021. See the schedule below for CAP 41 to CAP 45 rates applicable for each fiscal year. These City-Wide rates established in the Cost Allocation Plan were prepared by the Controller's Office.

Fiscal Year	CAP No.	Civilian	Sworn With Field Support	Sworn without Field Support
FY 2020 - 2021	CAP 41	181.66%	171.28%	127.89%
FY 2021 - 2022	CAP 42	136.32%	153.23%	129.53%
FY 2022 - 2023	CAP 43	137.73%	161.76%	140.59%
FY 2023 - 2024	CAP 45	68.90%	111.53%	82.54%

Source: Board of Police Commissioners Intradepartmental Correspondence from City of Los Angeles Website

LAPD should have used CAP 42, CAP 43, and CAP 45 for FY 2022, FY 2023, and FY 2024, respectively for invoicing its' indirect costs to Metro. For FY 2023, we selected and reviewed LAPD's billings for three invoices (invoice no. 23MTADP04 and 23MTADP07, and 23MTADP13). Invoice No. 23MTADP04 was for the period from April 9, 2023, to May 6, 2023, in the amount of \$6,747,718.25. Invoice No. 23MTADP07 was for the period from July 3, 2022, to July 30, 2022, in the amount of \$6,396,495.37. Invoice No. 23MTADP13 was for the period from December 18, 2022, to January 14, 2023, in the amount of \$7,208,325.92. For the three sample invoices, if CAP 43 were properly used to bill Metro, total CAP 43 amount would have been \$3,907,605.57 which is \$370,705.16 less than the CAP 41 amount of \$4,278,310.73. Table 18 below summarizes the calculation of the indirect cost overbilling of \$370,705.16.

Table 18: Calculation of LAPD Indirect Cost Overbilling

Invoice No.	Datasheet Name	Type	Labor Costs	CAP 41 Rate	CAP 41 Amount	CAP 43 Rate	CAP 43 Amount	Questioned CAP Amount
23MTADP04	TSB OH Div 305	Civilian	\$ 84,853.03	174.09%	\$ 147,720.64	130.16%	\$ 110,444.70	\$ 37,275.94
23MTADP04	TSB OH Div 305	Sworn	\$ 759,550.67	160.85%	\$ 1,221,737.25	151.33%	\$ 1,149,428.03	\$ 72,309.22
23MTADP04	TSB OH Non-305	Civilian	\$ 30,184.17	181.66%	\$ 54,832.56	137.73%	\$ 41,572.66	\$ 13,259.90
	Subtotal		\$ 874,587.87		\$ 1,424,290.45		\$ 1,301,445.39	\$ 122,845.06
23MTADP07	TSB OH Div 305	Civilian	\$ 79,478.66	174.09%	\$ 138,364.40	130.16%	\$ 103,449.42	\$ 34,914.98
23MTADP07	TSB OH Div 305	Sworn	\$ 746,139.18	160.85%	\$ 1,200,164.87	151.33%	\$ 1,129,132.42	\$ 71,032.45
23MTADP07	TSB OH Non-305	Civilian	\$ 40,228.19	181.66%	\$ 73,078.53	137.73%	\$ 55,406.29	\$ 17,672.24
	Subtotal		\$ 865,846.03		\$ 1,411,607.80		\$ 1,287,988.13	\$ 123,619.67
23MTADP13	TSB OH Div 305	Civilian	\$ 87,626.65	174.09%	\$ 152,549.23	130.16%	\$ 114,054.85	\$ 38,494.38
23MTADP13	TSB OH Div 305	Sworn	\$ 769,891.08	160.85%	\$ 1,238,369.80	151.33%	\$ 1,165,076.17	\$ 73,293.63
23MTADP13	TSB OH Non-305	Civilian	\$ 28,346.06	181.66%	\$ 51,493.45	137.73%	\$ 39,041.03	\$ 12,452.42
	Subtotal		\$ 885,863.79		\$ 1,442,412.48		\$ 1,318,172.05	\$ 124,240.43
Total			\$ 2,626,297.69		\$ 4,278,310.73		\$ 3,907,605.57	\$ 370,705.16

For CAP 43, we used the City-Wide rates of 137.73% for Civilian and 161.76% for Sworn with Field Support. These rates were applicable to full time (straight time) positions not working at a Metro Office. According to the instructions for CAP 41, if the entity provides office space, telephone service, computers, vehicles, or any other items listed in the CAP rate calculations, LAPD's rates must be adjusted to exclude those items. Since Metro provides office space (telephones, water, electricity, all cleaning supplies and custodial services), discounted monthly parking, cell phones, copy machines and ink cartridges to the regular full-time staff working at Metro Office (Division 305), the Central Services rates were adjusted downward by 7.57% for Civilian and 10.43% for Sworn. The schedule below summarizes the CAP 41 and CAP 43 rates used in the calculation of the questioned cost of \$370,705.16 above.

Description	City Wide Rate	Adjustments (Metro Office)	Metro Office Rate
<i>CAP 41</i>			
Civilian	181.66%	(7.57%)	174.09%
Sworn With Field Support	171.28%	(10.43%)	160.85%
<i>CAP 43</i>			
Civilian	137.73%	(7.57%)	130.16%
Sworn With Field Support	161.76%	(10.43%)	151.33%

Per Metro SSLE, there have been two (2) official versions of CAP 41 issued to date. The first version was introduced on February 18, 2021, a “Revised FY21 Rates with CAP 41” is available for review. The second version was signed on April 12, 2023, also available for review as “FY2023 Fully Burdened Rates Memo 041223 CAP 41.” In addition to adjusting salary maximums, the latter version also introduced several newly approved positions. For clarity, the initial iteration of CAP 41 is applicable to Fiscal Years 2021 and 2022, while the second version is in effect for Fiscal Year 2023 onward. CAP 42 will be in effect in an upcoming deployment period

We reviewed the second version that Metro SSLE referred to above and found that on July 21, 2023, Metro SSLE approved the fully burdened rates to be effective July 1, 2023, which is for Fiscal Year 2024. No written documentation from the City’s CAP Office was provided to support that CAP 41 should be used to bill Metro for Fiscal Year 2023.

LAPD’s Response:

LAPD disagreed and stated that CAP 41 was federally approved during the Fiscal Years 2022-2023 and 2023-2024.

LAPD further stated in discussions with Metro OIG, that they were instructed by a financial advisor in the City of Los Angeles to use CAP41.

Auditor Rejoinder:

No information was found in CAP 41 documents supporting that CAP 41 rates were federally approved during Fiscal Years 2022-2023 and 2023-2024 as claimed by LAPD. According to Intradepartmental Correspondence dated April 28, 2020, from Executive Director of Board of Police Commissioners to the Honorable Board of Police Commissioners, CAP 41 rates were for Fiscal Year 2021. For Fiscal Years 2022, 2023, and 2024, CAP rates 42, 43, and 45 were applicable, respectively. See table below for details.

Fiscal Year	CAP No.	Civilian	Sworn With Field Support	Sworn without Field Support
FY 2020 - 2021	CAP 41	181.66%	171.28%	127.89%
FY 2021 - 2022	CAP 42	136.32%	153.23%	129.53%
FY 2022 - 2023	CAP 43	137.73%	161.76%	140.59%
FY 2023 - 2024	CAP 45	68.90%	111.53%	82.54%

Source: Board of Police Commissioners Intradepartmental Correspondence from City of Los Angeles Website

Metro has been overpaying LAPD using higher CAP rates (CAP 41). Since LAPD used lower CAP rates (CAP 42, 43, and 45) to bill their services to other agencies and departments for Fiscal Years 2022, 2023, and 2024, these lower CAP rates should also have been used to bill Metro. Thus, Metro's payment to LAPD using higher CAP rates (CAP 41) for fiscal years 2022, 2023, and 2024 is not justified and not in compliance with the contract requirements.

If LAPD was instructed by financial advisors in the City of Los Angeles as to the correct CAP rate to use, that would not alter the requirement to correctly invoice Metro.

Recommendation 8: Metro's SSLE Department should enforce the contract requiring LAPD to submit annually the List of Maximum Fully Burdened Hourly Rates and all the required supporting documentation ninety (90) days prior to the start of each fiscal year and any changes to the CAP rates during the fiscal year. Metro should also review the billing rates for all invoices to determine the extent of overbillings for FY 2022, FY 2023, and FY 2024.

Finding 12: Four of LAPD's labor classifications totaling \$99,476.61 on three sample invoices were not found on Metro's approved List of Maximum Fully Burdened Hourly Rates.

As previously stated, the contract required LAPD to submit annually a List of Maximum Fully Burdened Hourly Rates listing all the labor classifications and applicable rates. The contract further states that in no case shall the billing rate for personnel exceed the maximum fully burdened rate set for each personnel's labor classification.

For each of the three sample invoices, we compared the hourly rates billed to Metro's approved List of Maximum Fully Burdened Hourly Rates for full time (straight time) personnel and overtime personnel that LAPD submitted to Metro on February 18, 2021. Based on our review, 4 labor classifications were not found on the List of Maximum Fully Burdened Hourly Rates. The total amount billed for these 4 labor classifications was \$99,476.61.

Table 19 below summarizes the amount billed for the labor classifications not found on the List of Maximum Fully Burdened Hourly Rates for full time (straight time) personnel and overtime personnel.

Table 19: Cost of Labor Classifications Not in Contract

CSC/G	23MTADP04	23MTADP07	23MTADP13	Total
<i>Full Time (Straight Time) Personnel</i>				
15080	\$ 17,341.24	\$ -	\$ -	\$17,341.24
91711	\$ 26,948.42	\$ 26,179.49	\$ 26,254.86	\$79,382.77
Subtotal	\$ 44,289.66	\$ 26,179.49	\$ 26,254.86	\$96,724.01
<i>Overtime Personnel</i>				
2214C	\$ 1,136.15	\$ 257.59	\$ -	\$ 1,393.74
32110	\$ 1,358.86	\$ -	\$ -	\$ 1,358.86
Subtotal	\$ 2,495.01	\$ 257.59	\$ -	\$ 2,752.60
Total	\$ 46,784.67	\$ 26,437.08	\$ 26,254.86	\$99,476.61

LAPD's Response:

LAPD disagreed and stated that the classifications identified in Finding 13 were either communicated to Metro as part of proposed or planned deployments (e.g., Detention Officers) or were used to provide authorized contract services more cost-effectively such as assigning an SMA I in lieu of an SMA II, or a Management Aide in lieu of a Management Analyst.

Auditor Rejoinder:

Per an email from Metro SSLE to LAPD dated July 21, 2023, these classifications were approved to work on the contract starting July 1, 2023, which is for Fiscal Year 2024. There is no documentation showing that the listed classifications were approved for Fiscal Year 2023 which is for the period from July 1, 2022, to June 30, 2023.

Recommendation 9: For any additional labor classifications not identified in the Lists of Maximum Fully Burdened Hourly Rates for full time (straight time) personnel and overtime personnel, LAPD should obtain in writing from Metro the revised lists for approval prior to incurring and billing the cost.

Metro's SSLE Department should also improve its' monitoring of LAPD's billings to ensure only the approved labor classifications are billed. Metro should also review the billing classifications for all invoices to determine the extent of overbillings for unapproved labor classifications.

Finding 13: Union benefits may have been billed twice to Metro, once using the fringe benefits rates and again as direct costs.

For the three sample invoices, a total of \$696,302.72 was directly billed to the Metro contract for union benefits. These costs were billed using various VAR Codes. According to LAPD, these timekeeping codes (VAR Codes) were added due to negotiations with employees' labor unions or City Administrative changes. Table 20 below summarizes the union benefits billed to Metro by VAR Codes.

Table 20: Union Benefits Billed to Metro

VAR CODE	VARCODE DESCRIPTION	23MTADP04	23MTADP07	23MTADP13	Total
AR	Adjustment Permanent Variation in Rate	\$ 2,082.63	\$ 17,582.33	\$ 352.15	\$ 20,017.10
BR	LAPD Associates Degree Bonus	\$ 24,780.75	\$ 23,789.52	\$ 23,789.52	\$ 72,359.79
BV	LAPD Bachelors Degree Bonus	\$ 40,092.65	\$ 47,657.29	\$ 52,196.08	\$ 139,946.03
EB	Crime and Intelligence Analyst Cert	\$ 1,644.54	\$ 1,644.54	\$ 1,644.54	\$ 4,933.62
HY	Smoothing Variation for HW - System Generated	\$ (2,523.05)		\$ (45.96)	\$ (2,569.01)
ID	I.O.D. Pay (Pension)	\$ 88,638.76	\$ 123,911.03	\$ 33,520.74	\$ 246,070.53
KS	Old Overtime Off At Straight Time - Police	\$ 1,594.45	\$ 3,488.09	\$ 1,423.20	\$ 6,505.73
KT	Old Overtime Off At 1 1/2 Times - Police	\$ 1,302.55	\$ 7,626.16	\$ 566.04	\$ 9,494.76
MK	LAPD Marksmanship Bonus (+ Or -)	\$ 1,940.72	\$ 792.98	\$ 1,961.59	\$ 4,695.30
QL	Covid 19 Supp Paid		\$ 11,284.37	\$ 20,635.58	\$ 31,919.95
QZ	Family Covid 19 Child Care		\$ 76,693.20	\$ 52,189.24	\$ 128,882.44
RH	LAPD Vehicle Equipment Bonus	\$ 844.98	\$ 1,267.47	\$ -	\$ 2,112.45
SE	Banked Excess Sick Time - Time Off	\$ 1,770.13		\$ -	\$ 1,770.13
T9	Covid19 Work From Home Pay	\$ 4,603.23	\$ 15,169.38	\$ 8,710.60	\$ 28,483.21
TO	Overtime Taken Off (1.5)	\$ 257.51		\$ 1,423.20	\$ 1,680.71
Total		\$ 167,029.85	\$ 330,906.36	\$ 198,366.52	\$ 696,302.72

Concurrently, LAPD may have also billed Metro union benefits as part of their fringe benefits costs of \$1,897,951.12 using the CAP 41 fringe benefits rates of 49.28% for Civilian and 75.81% for Sworn positions (see Table 21 below). According to the instructions for CAP 41, LAPD should contact the CAP Office for adjusted rates if any costs listed in fringe benefits were directly billed to a contract to avoid double billing.

Table 21: Fringe Benefit Costs Billed to Metro

Invoice No.	Datasheet Name	Type	Labor Costs	Fringe Benefit Rate (CAP 41)	Fringe Benefit Amount
23MTADP04	TSB OH Div 305	Civilian	\$ 84,853.03	49.28%	\$ 41,815.57
23MTADP04	TSB OH Div 305	Sworn	\$ 759,550.67	75.81%	\$ 575,815.36
23MTADP04	TSB OH Non-305	Civilian	\$ 30,184.17	49.28%	\$ 14,874.76
	Subtotal		\$ 874,587.87		\$ 632,505.69
23MTADP07	TSB OH Div 305	Civilian	\$ 79,478.66	49.28%	\$ 39,167.08
23MTADP07	TSB OH Div 305	Sworn	\$ 746,139.18	75.81%	\$ 565,648.11
23MTADP07	TSB OH Non-305	Civilian	\$ 40,228.19	49.28%	\$ 19,824.45
	Subtotal		\$ 865,846.03		\$ 624,639.64
23MTADP13	TSB OH Div 305	Civilian	\$ 87,626.65	49.28%	\$ 43,182.41
23MTADP13	TSB OH Div 305	Sworn	\$ 769,891.08	75.81%	\$ 583,654.43
23MTADP13	TSB OH Non-305	Civilian	\$ 28,346.06	49.28%	\$ 13,968.94
	Subtotal		\$ 885,863.79		\$ 640,805.78
Total			\$ 2,626,297.69		\$ 1,897,951.11

LAPD's Response:

LAPD disagreed and stated that in a letter to Metro dated December 16, 2020, LAPD addressed the issue and described the same VAR Codes listed in Finding 14, Table 21: Union Benefits

Billed to Metro. Since then, LAPD has provided updated lists of VAR Codes billable to Metro. The cost components associated with these VAR Codes are not included in the CAP Fringe Benefit rate components outlined in Attachment C of Memorandum No. 21-001 from the City Controller to all City Department Heads.

Auditor Rejoinder:

According to Attachment C of Memorandum No. 21-001 from the City Controller, Union Sponsored Benefits, Pensions, Unused Sick/Vacation Payout, etc. were included in the calculation of the Fringe Benefits Rate. LAPD billed Metro using both the Fringe Benefit Rate and directly billed Metro the costs listed in Table 20 above. Thus, further clarification from the City Controller should be provided to confirm whether the Fringe Benefit Rate should be used or adjusted if any costs listed in Table 20 were directly billed to Metro.

Recommendation 10: LAPD should obtain clarification and any supporting documentation from the City's CAP office to determine whether the additional union benefits billed directly to this contract were included in the calculation of the fringe benefits rates, and whether the fringe benefits rates should be adjusted if additional union benefits were directly billed to Metro. Metro's SSLE Department should also review the explanation and any supporting documents from the CAP office to ensure that the union benefits were not being billed twice.

Finding 14: The overhead rates billed for overtime were not adequately supported.

For overtime personnel working at Metro Office (Division 305), LAPD billed Metro using the overhead rates of 5.02% for Civilian and 10.59% for Sworn. For personnel not working at Metro Office (Division 305), LAPD billed Metro using the rates of 6.27% for Civilian and 11.44% for Sworn. A copy of Memorandum No. 21-001 dated January 6, 2021, was provided to support the Federal Government's approved Cost Allocation Plan (CAP) 41 indirect cost rates for regular full-time staff. According to the instructions for CAP 41, these rates are to be applied only to straight time for full time gross salaries. For rates applicable to part time or overtime salaries, LAPD needs to contact the CAP office. No documentation was provided to support the overhead rates for overtime.

The four overhead rates of 5.02%, 10.59%, 6.27%, and 11.44% were included in the List of Maximum Fully Burdened Hourly Rates that LAPD submitted to Metro on February 18, 2021. As previously stated, LAPD did not provide the required documentation to support the rates in the List of Maximum Fully Burdened Hourly Rates. Thus, we are unable to verify the validity of these overhead rates billed to Metro. For the three sample invoices, LAPD billed a total of \$1,221,707.78 in overhead costs for overtime.

LAPD's Response:

LAPD disagreed and stated that LAPD notified Metro of the application of the CAP 41 rate on February 18, 2021. The overhead rates billed during the audited performance period were based on CAP 41, which remained in effect throughout that time. To address documentation concerns, LAPD may provide Metro with confirmation at the start of each fiscal year indicating whether any changes to the CAP rates have occurred.

Auditor Rejoinder:

The documents provided for CAP 41 only shows CAP rates for straight time. The CAP rates that LAPD billed Metro for overtime were not found in CAP 41 documents. According to the instructions for CAP 41, for rates applicable for overtime, LAPD needs to contact the CAP office. Thus, documentation from the CAP office should be provided to support the CAP rates billed for overtime.

Recommendation 11: LAPD should contact the CAP office to obtain the CAP rates for overtime and submit these documents to Metro together with the List of Maximum Fully Burdened Hourly Rates. Metro's SSLE Department should continue to monitor LAPD's billings to ensure the overtime overhead rates billed were based on the CAP overhead rates in effect at the time the work was performed.

Finding 15: Labor hours billed were found to be higher than the Weekly Deployment Reports for 2 out 3 sample invoices.

To obtain an understanding of the hours billed, we compared the hours billed to the Weekly Deployment Reports for the sample invoices. For each invoice, we tested one line each day for a period of two weeks. Based on our testing, we found the hours billed were higher than the Weekly Deployment Reports for 2 out 3 sample invoices. Table 22 below summarizes the discrepancies found and the cost of \$1,834.71 questioned.

Table 22: Calculation of Labor Hours Overbilled

Invoice No.	Datasheet Name	Serial No.	Var Date	Class/ Grade	Hours Billed	Rate Billed	Amount Billed	Deployment Report Hours	Hour Difference	Questioned Cost
23MTADP04	Bus Riding Team	34762	4/9/2023	22142	5.00	\$ 99.15	\$ 495.75	4.50	0.50	\$ 49.58
23MTADP04	E Line Detail	42858	4/21/2023	22142	9.50	\$ 87.74	\$ 833.49	9.00	0.50	\$ 43.87
23MTADP04	E Line Detail	43911	4/21/2023	22142	9.50	\$ 74.50	\$ 707.73	9.00	0.50	\$ 37.25
23MTADP04	L Line Detail	40474	4/20/2023	22142	11.00	\$ 96.89	\$ 1,065.82	9.00	2.00	\$ 193.79
23MTADP04	L Line Detail	39986	4/20/2023	22142	11.00	\$ 96.73	\$ 1,064.05	9.00	2.00	\$ 193.46
23MTADP04	L Line Detail	40927	4/13/2023	22142	9.50	\$ 96.89	\$ 920.48	9.00	0.50	\$ 48.45
23MTADP04	Bus Riding Team	34845	4/22/2023	22143	10.00	\$ 110.10	\$ 1,100.99	9.00	1.00	\$ 110.10
23MTADP04	Bus Riding Team	37704	4/9/2023	22143	5.00	\$ 105.44	\$ 527.18	4.50	0.50	\$ 52.72
23MTADP04	L Line Detail	40601	4/13/2023	22143	9.50	\$ 102.28	\$ 971.70	9.00	0.50	\$ 51.14
23MTADP04	A Line Detail	38401	4/14/2023	22271	10.50	\$ 119.33	\$ 1,252.97	9.00	1.50	\$ 179.00
23MTADP04	B Line Detail	33596	4/14/2023	22271	10.50	\$ 119.05	\$ 1,250.01	9.00	1.50	\$ 178.57
23MTADP04	E Line Detail	37688	4/14/2023	22272	10.50	\$ 127.18	\$ 1,335.44	9.00	1.50	\$ 190.78
23MTADP04	D Line Detail	37047	4/16/2023	22272	10.00	\$ 122.75	\$ 1,227.55	9.00	1.00	\$ 122.75
Subtotal										\$ 1,451.45
23MTADP13	Bus Riding Team	36307	12/21/2022	22142	9.50	\$ 99.31	\$ 943.47	9.00	0.50	\$ 49.66
23MTADP13	Bus Riding Team	43064	12/21/2022	22142	9.50	\$ 87.70	\$ 833.13	9.00	0.50	\$ 43.85
23MTADP13	L Line Detail	35373	12/19/2022	22271	10.00	\$ 115.90	\$ 1,159.02	9.00	1.00	\$ 115.90
23MTADP13	G Line Detail	37406	12/28/2022	22232	10.50	\$ 115.90	\$ 1,216.97	9.00	1.50	\$ 173.85
Subtotal										\$ 383.26
Total										\$ 1,834.71

LAPD's Response:

The LAPD Fiscal Group (FG) bills employee hours based on the E214s provided by TSB. Our review confirms that the billed hours were supported by the E214s received.

Auditor Rejoinder:

Our testing as detailed above in Table 22 indicated differences in billed hours when comparing the billed hours to the Deployment Report Hours reports.

Recommendation 12: We recommend the SSLE Department further review these billed hour discrepancies to resolve any differences with LAPD. Based on the outcome of the review, SSLE should review the billing for all invoices to determine the extent of the overbilling of hours if determined to be necessary.

Finding 16: Twenty (20) hours billed per month for animal care was not specified in the contract.

For K-9 and Bomb Detection billings to Metro, 27 hours to 36 hours were billed for 6 LAPD officers on May 6, 2023. Of these hours, 20 hours (straight time) billed for each officer were for monthly animal care time. The contract with Metro does not specify the allowability of the 20 hours billed per month for animal care.

Metro SSLE agreed and stated that they will suggest language which allows for the care of canine's is incorporated into the upcoming contract modifications.

LAPD's Response:

The LAPD Fiscal Group (FG) does not agree with this finding. The Pet Care and Maintenance Bonus is payment to Bomb Canine Handlers as provided in MOU 24, Article 4.1 B.7. This cost component was presented to and approved by Metro, as documented in the attached "K9 funding memo," and has been included in the final approved contract costs in all subsequent Contract Modifications.

Recommendation 13: We recommend that Metro amend the contract to include the hours billed for monthly animal care.

Long Beach Police Department (LBPD)

On March 23, 2017, Metro entered a five-year contract with LBPD for a not-to-exceed amount of \$30,074,628 with a start date of March 23, 2017, and end date of June 30, 2022. This contract was subsequently modified by eight (8) modifications amending the Statement of Work, Contract Price, and Period of Performance. For FY 2023, Modification No. 7 and 8 were executed extending the period of performance to June 30, 2023, and increasing the not-to-exceed total contract price to \$44,081,623. Table 23 below summarizes the amount approved up to June 30, 2023.

Table 23: LBPD Contract Amounts

Description	Period of Performance	Contract Price Increase	Not-To-Exceed Contract Price
Base Contract	3/23/2017 - 6/30/2022		\$ 30,074,628
Modification No. 3		\$ 3,147,962	
Modification No. 4		\$ 3,730,814	
Modification No. 7	7/1/2022 - 12/31/2022	\$ 4,500,000	
Modification No. 8	1/1/2023 - 6/30/2023	\$ 2,628,219	
TOTAL		\$ 14,006,995	\$ 44,081,623

Finding 17: The total amount billed and paid to LBPD for FY 2023 exceeded Modification No. 7 and 8 for FY 2023 by \$933,043.

For FY 2023, the contract amount approved under Modification No. 7 and 8 totaled \$7,128,219. The total amount billed and paid to LBPD was \$8,061,262 which exceeded the contract amount of \$7,128,219 by \$933,043. The schedule below summarizes the contract amount and billing and payment amount for FY 2023.

Description	FY 2023
Modification No. 7 and 8 Contract Amount	\$ 7,128,219
Billing and Payment - Actual	8,061,262
Difference	\$ (933,043)

Per LBPD, as of June 30, 2023, LBPD had received a total of \$43,633,150 in payments from Metro, an amount that remains \$448,473 below the approved contract ceiling of \$44,081,623.

Finding 18: Invoices were supported by bi-weekly Work Hour Detail Schedules, Daily Metro Cost, Regular Overtime Report, and Employee Time Records. However, payroll records were not submitted with the invoices.

According to Modification No. 6, Section 7.0 of the Statement of Work, the Contractor's monthly invoice shall be based on actual services provided under the terms of the contract. The billing must be accompanied by supporting documentation, to include but shall not be limited to, daily summary of assignments and hours worked **and payroll records**. Also, Modification No. 2, Memorandum of Costs, specified that total direct labor cost shall be calculated based on actual hourly direct labor rate multiplied by number of actual hours worked.

We reviewed LBPD's billing for three invoices in the amounts of \$356,604.24 for July 2022, \$1,036,22.89 for September 2022, and \$1,062,233.91 for March 2023. For each invoice, LBPD submitted a Work Hour Detail schedule by pay period, Daily Metro Cost, Regular Overtime Report, and Employee Time Records. However, payroll records were not submitted with the invoices to support the actual hourly direct labor rates billed.

LBPD Response:

The Bi-Weekly Work Hour Detail Schedules are generated directly from LBPD's financial system and reflect the payroll data used to determine employee compensation and associated costs. The Regular Overtime Reports and Employee Time Records serve as the source data that is entered into the financial system, enabling the generation of the Bi-Weekly Work Hour Detail Schedules. These documents have been submitted consistently since the beginning of the contract and serve as LBPD's official payroll records in support of all invoiced amounts.

Recommendation 14: Metro's SSLE Department should document the acceptance of the Bi-Weekly Work Hour Detail Schedules as payroll data.

Finding 19: Paid Time Off (PTO) accrual hours billed totaling \$195,116.96 were found to be unallowable per Contract Modification No. 2.

LBPD Work Hour Detail Schedules included with the invoices show that the hours billed included PTO accrual hours. However, according to revised Memorandum of Costs (Contract Modification No. 2), total direct labor cost shall be calculated based on actual hourly direct labor rate multiplied by number of actual hours worked. Since PTO accrual hours were not actual hours worked, PTO hours are not allowed according to Contract Modification No. 2.

According to LBPD's May 7, 2021, memo to Metro's SSLE, monthly invoices submitted will include a PTO factor that allows for the billable hours to capture the real cost of employee benefits according to the labor MOUs. Full time employees were compensated for 2,088 annual hours, which accounts for both direct work hours, as well as the accruals for PTO hours, which

were based on years of service under the employee labor agreements. The hours for which PTO was collected had been excluded from previous billing calculations. Without their inclusion, LBPD would be subsidizing the costs of staff assigned to the Metro contract instead of collecting the full costs. Metro is not billed for time off when employees assigned to the contract take time off.

According to Metro SSLE, PTO accrual hours included were for transparency purposes. Prior to May 2021, LBPD work details reflected hours that did not align with the timecards reviewed by the Metro compliance group. LBPD informed the compliance group that the hours in the work detail reflected PTO accrual because PTO was actual costs. The compliance group requested that LBPD include the PTO hours in the Work Detail Schedules.

We reviewed LBPD Daily Metro Cost Report and found that a benefit rate of 64.014% was included in the total labor cost for Police Sergeant and Police Lieutenant. For Administrative Analyst III and Clerk Typist III, a benefit rate of 57.883% were included in the total labor cost. There was no detailed cost breakdown of the labor rates billed for a Police Officer position. Based on these daily reports, the benefit rates of 64.014% and 57.883% include: (1) PERS Pension, (2) Health/Dental/Life Insurance, (3) Vacation/Sick Leave Overhead Rate, (4) Medicare, (5) Retirement Sick Leave Overhead Rate, and (6) Workers Comp. No documentation was provided to support the benefit rates of 64.014% and 57.883%. Since PTO was already included in the benefit rates and reflected in the hourly rates billed, billing PTO hours again in addition to actual hours worked appears to be double billing. For the three sample invoices, the amount billed for PTO hours totaled \$195,116.96 (see schedule below).

Invoice No.	Invoice Period	PTO Amount
0580MTA-2210	July 2022	\$ 23,159.13
0580MTA - 2212	September 2022	\$ 83,715.24
0580MTA - 2306	March 2023	\$ 88,242.59
Total		\$ 195,116.96

LBPD's Response:

Upon review, it appears there may be a misunderstanding regarding the treatment of Paid Time Off (PTO) in LBPD's billing practices. "PTO hours" is a misnomer, LBPD did not bill PTO hours separately or in addition to the allowable costs under Contract Modification No. 2. Rather, accrual hours were incorporated into the calculation of the maximum burdened hourly rate, through a mutually agreed upon billing methodology to collect for the full cost of employees assigned to the contract. On May 7, 2021, LBPD provided a formal memorandum to Metro's Director of Administration and Compliance outlining this revised billing methodology. The memo detailed the use of a PTO Factor to ensure that the billing accurately reflects the actual cost of employee compensation, including employer obligations such as retirement contributions and health benefits, in accordance with the labor Memorandum of Understanding (MOUs). Metro Contract

Compliance staff reviewed this methodology through several meetings with LBPDP personnel and accepted its use. This methodology has been consistently applied since that time. During the agreement, it became clear that the original fully burdened rate methodology did not capture all benefit costs for employees assigned fulltime to the contract. Specifically, while paid leave hours (such as vacation or sick time) were not directly billed, fixed employer obligations, such as California Public Employees' Retirement System (PERS) contributions, health insurance, and other benefit accruals continued to be incurred. Due to the structure of the City's payroll and financial system, these ongoing costs are accrued even when no direct billable hours are recorded during leave. To equitably allocate these fixed costs, and properly bill Metro, LBPDP incorporated accrued hours in the burdened rate denominator, distributing benefit costs across the standard 2,088 hours annually compensated to full-times staff. It is important to clarify that no duplicative or unallowable PTO charges were billed. The amounts billed reflect actual costs incurred, including precise monthly benefit contributions, rather than inflated hours or duplicative charges. Any appearance of duplication may stem from the labeling of format of the supporting documentation, where accruals titled "PTO hours" appear for rate normalization purposes. However, no separate or duplicative billing of PTO occurred. In summary, LBPDP confirms that there were no overbilling or duplicate charging of PTO hours. The billing methodology was transparent, mutually reviewed and agreed upon by Metro, and designed to allocate legitimate, ongoing personnel costs fairly. LBPDP respectfully request that this finding be reconsidered based on the documented agreement, consistent application of the approved methodology, and the absence of any actual unallowable or duplicative billing.

Auditor Rejoinder:

If the PTO accrual hours were incorporated into the calculation of the maximum burdened hourly rate, through a mutually agreed upon billing methodology to collect for the full cost of employees assigned to the contract, then PTO accrual hours should not be billed again directly as a separate line item on the Bi-Weekly Work Hour Detail Schedule.

Also, since the Work Hour Detail Schedule only shows total hours and a lump sum amount for each line item without showing each employee's actual pay rate and the cost breakdown of the associated benefit costs, we reviewed the detailed cost breakdown shown on LBPDP Daily Metro Cost Reports and noted that the benefit rates of 64.014% and 57.883% were also included in the billing rates.

Recommendation 15: LBPDP should provide Metro with the Cost Allocation Plan to support the benefit rates of 64.014% and 57.883% included in the billing rates. If PTO is already included in the benefit rates, then Metro should disallow the costs billed for PTO hours of \$195,116.96 since PTO costs are already recovered through the benefit rates and reflected in the hourly rate billed for each employee.

Finding 20: Discrepancies were found between the labor hours and amounts billed in the Work Hour Detail Schedule and LBPDP Daily Metro Cost Reports, resulting in an overbilled amount of \$19,820.26.

To obtain an understanding of the hours billed, we compared the hours billed in the Work Hour Detail Schedule to LBPDP Daily Metro Cost Reports for one pay period ending March 24, 2023. Based on our testing, we found the hours and amounts billed in the Work Hour Detail Schedule were not the same as the hours and amounts shown in LBPDP Daily Metro Cost Reports.

LBPDP's Response:

LBPDP respectfully disagrees with the audit finding indicating an overbilled amount of \$19,820.26 due to discrepancies between the Work Hour Detail Schedule and the LBPDP Daily Metro Cost Reports. The audit report does not identify the specific month or pay period being referenced as overbilled, making it difficult for LBPDP to verify or assess the accuracy of the comparison. After internal review, LBPDP was able to determine that the auditors are referring to the March 24, 2023, pay period. If this assumption is correct, the discrepancy can be attributed to a misalignment in the data sets being compared, and not an overbilling. LBPDP's March 24, 2023, pay period spans March 11 through March 24, 2023. In contrast, the audit appears to compare only March 16 through March 24, omitting five days of payroll data. As a result, any direct comparison between these two data sets will inherently produce discrepancies. The Work Hour Detail Schedule included in the billing packet is the official document of record for all invoiced amounts, as it is generated directly from the City's financial system. Accurate and complete employee compensation cost data is provided in the Work Hour Detail Schedule. As noted in LBPDP's response to Finding No. 19, the Work Hour Detail Schedule remains the authoritative source for payroll data. The LBPDP Daily Metro Cost Reports were intended solely to provide a daily summary of hours worked by personnel working the Metro Detail and were not designed with the detail necessary to calculate actual labor costs. The benefit rates included should not be assumed to provide the most up to date rates, as they are not generated by the financial system. LBPDP respectfully request that the auditors revisit this finding with the correct pay period data using the Work Hour Detail Schedule as the source document to ensure a valid and accurate comparison.

Auditor Rejoinder:

We compared the hours and amounts billed on the Work Hour Detail Schedule to the hours and amounts shown on LBPDP Daily Metro Cost Reports for the period from March 11, 2023, to March 24, 2023. Therefore, there should not be any misalignment in the data sets being compared or omitting five days of payroll data.

Since the Work Hour Detail Schedule only shows the total hours and a lump sum amount for each line item without any details showing how the amount was calculated, the detailed cost breakdown reflected on LBPDP Daily Metro Cost Reports were used to review the calculation of

the hours and amounts claimed on the Work Hour Detail Schedule. If the benefit rates in LBPD Daily Metro Cost Reports are not up to date as they are not generated by the financial system, then LBPD should update the benefit rates accordingly to ensure the accuracy of the benefit rates billed to Metro.

Recommendation 16: We recommend that LBPD reconcile the hours and amounts claimed on the Work Hour Detail Schedules to the Daily Metro Cost Reports and correct any discrepancies between these two documents to ensure the accuracy of the billed amount.

Metro's SSLE Department should improve its' monitoring of LBPD billings to identify and resolve billing discrepancies. Metro should also review the billing for all invoices to determine the extent of labor hours overbillings.

Finding 21: Other Direct Costs (ODC) billed were not adequately supported.

Under Contract Modification No. 2, LBPD was allowed to bill the actual cost of vehicles, equipment, supplies including uniforms and other items needed by law enforcement personnel in the performance of the Statement of Work. For the sample invoices, LBPD billed a total of \$169,841.79 for ODC of which \$166,615.20 had no supporting documentation. For Inmate Booking Cost, LBPD billed a rate of \$939.45 for each booking. For Body Worn Camera Support & License, LBPD billed a monthly rate of \$1,937.09. For Body Worn Camera Archiving & Redaction, LBPD billed a monthly rate of \$1,166.67. These monthly rates and booking rate were not found in the contract agreement or contract modifications. In addition, LBPD billed a total of \$24,163.36 for Fleet Services and \$128,443.31 for Technology Services with no supporting documentation.

Table 24 below summarizes the amount billed for ODC and unsupported cost.

Table 24: Unsupported ODC

Description	Amount Billed (July 2022)	Amount Billed (September 2022)	Amount Billed (March 2023)	Total	Unsupported Cost
Inmate Booking Cost	\$ 2,818.35	\$ -	\$ 1,878.90	\$ 4,697.25	\$ 4,697.25
Body Worn Camera Support & License	\$ 1,937.09	\$ 1,937.09	\$ 1,937.09	\$ 5,811.27	\$ 5,811.27
Body Worn Camera Archiving & Redaction	\$ 1,166.67	\$ 1,166.67	\$ 1,166.67	\$ 3,500.01	\$ 3,500.01
Supplies and Equipment	\$ 1,120.32	\$ 1,902.19	\$ 204.08	\$ 3,226.59	
Fleet Services	\$ 8,713.54	\$ 5,925.87	\$ 9,523.95	\$ 24,163.36	\$ 24,163.36
Technology Services	\$ -	\$ 49,821.31	\$ 78,622.00	\$ 128,443.31	\$ 128,443.31
Total	\$ 15,755.97	\$ 60,753.13	\$ 93,332.69	\$ 169,841.79	\$ 166,615.20

LBPD's Response:

LBPD respectfully submits the following clarifications and supporting context regarding the support for Other Direct Costs (ODC) billed under the contract. At the outset of the agreement, LBPD engaged directly with Metro staff to confirm expectations regarding the format and content of backup documentation. In September 2020, Metro staff reviewed a draft of LBPD's documentation and responded affirmatively that the format met their requirements. This

communication is attached for reference. While minor comments were provided on specific costs, Metro did not indicate that the overall documentation was inadequate or incomplete. Since that initial confirmation, LBPD has consistently used the same documentation format across all billing cycles, and no concerns were brought to our attention regarding its sufficiency until this audit. For Body Worn Camera (BWC) support, licensing, archiving, and redaction costs, LBPD maintains vendor invoices on file that directly substantiate the amounts billed to Metro. These invoices were maintained as part of our standard internal documentation procedures and were available to support the costs submitted to Metro. Regarding Fleet Services and Technology Costs, these services are provided by other City of Long Beach departments through established interdepartmental cost recovery processes. In accordance with our internal cost recovery procedures, we included detailed summary tables in each billing packet to reflect these costs associated with these internal services. These summaries were designed to provide clear and transparent support for the charges billed. Given this history of documented acceptance, the availability of supporting records, and our consistent application of approved practices, LBPD respectfully request that this finding be reconsidered.

Auditor Rejoinder:

Detailed cost schedules included with the invoices do not support how the billed amounts were calculated for ODC. Although Metro's acceptance that the format of these detailed cost schedules met their requirements, adequate source documentation should also be provided to support the amounts claimed on these detailed cost schedules. Without adequate documentation supporting the amounts claimed on the detailed cost schedules, we are unable to verify the validity of these amounts.

Recommendation 17: LBPD should provide Metro with adequate documentation to support ODC billings included above. Supporting documentation should include third party invoices, CPA audit reports, or the City of Long Beach Cost Allocation Plan. Metro's SSLE Department should also ensure LBPD's ODC billings are adequately supported before approving the invoices for payment.

D. Proactive Crime Policing Efforts, Principles of Campaign Zero’s “Eight Can’t Wait”/Use of Force

The objective of this section is to review the proactive crime policing efforts of LAPD, LASD and LBPD as well as evaluate whether their practices and policies are consistent with the principles of Campaign Zero’s “Eight Can’t Wait.” This evaluation includes a review of the law enforcement agencies’ proactive crime policing policies, a review of whether their programs are tailored to adapt to the modern transit policing environment, and a review of a sampling of their use of force reports to determine whether each of the law enforcement actions were consistent with the principles of Campaign Zero’s “Eight Can’t Wait.”

In July 2023, Metro established a multi-layered deployment approach focused on implementing a more proactive policing and security program. This approach includes all of Metro’s security partners and law enforcement agencies.

Concurrently with this new multi-layered deployment approach, in June 2023, Metro and the law enforcement agencies modified their agreements to include requirements that each agency’s policing practices be consistent with the principles of “Eight Can’t Wait.” “Eight Can’t Wait” was developed by Campaign Zero, a non-profit organization with the goal of promoting practices to reduce police violence. This campaign advocates for law enforcement agencies to adopt eight specific reforms designed to reduce police violence, including the use of deadly force.

To assess each agencies’ compliance with the principles of “Eight Can’t Wait” we (1) reviewed the law enforcement agencies’ proactive crime policing policies, (2) evaluated whether their programs are tailored to adapt to the modern transit policing environment, and (3) conducted a sampling of each agency’s use of force reports to determine whether those instances were consistent with the principles of Campaign Zero’s “Eight Can’t Wait.”

Proactive Crime Policing Policies and Practices

Proactive policing is the practice of preventing criminal activity before it happens. It includes activities such as ensuring a visible use of police presence and adopting effective public engagement. SSLE and the law enforcement agencies have prioritized three key strategies during the audit period to enhance their proactive policing programs. First, the agencies are providing greater visibility on the system through a coordinated multi-layered deployment approach. Second, the agencies have been trained and have policies to prevent and respond to emergencies and extreme events. And third, the agencies are implementing community policing efforts as part of their transit services.

Multi-Layered Deployments and Increased Visibility

Since the beginning of the audit period, the law enforcement agencies and SSLE have been making efforts to provide a more visible and coordinated presence on the transit system. In July 2023, SSLE worked with the law enforcement agencies to develop a multi-layered deployment approach focused on identifying key roles for each of Metro's security and law enforcement operations:

- *Law Enforcement Agencies* -- LAPD, LASD and LBPB are responsible for enforcing the penal code on the system, conducting trespass investigations and ejecting individuals from the system.
- *Metro Transit Security's (MTS)* – MTS's primary role is to enforce code of conduct rules (e.g., disruptive activities, smoking, alcohol use, six-foot length limit for devices, etc.) by providing warnings, issuing citations and, where appropriate, requesting assistance from the law enforcement agencies.
- *Metro Ambassadors* – Metro Ambassador's role within the system is to support riders by connecting them to resources, report incidents, and identifying facility maintenance needs.

As part of this overall strategy, SSLE conducts weekly meetings with its partners to review emerging trends, identify "hot spots" of criminal activity, and to adjust deployments to address previously identified needs. This multi-layered approach is designed to reduce criminal activity by preventing its occurrence and generate more positive attitudes towards policing efforts and overall safety for the riding public.

These efforts at improved coordination have been aided by temporary increases in LAPD and LASD's staffing levels on the system as part of a system-wide law enforcement "surge." Largely due to an increase in aggravated assaults and robberies at Metro stations, LAPD and LASD agreed to deploy additional officers on the system. The goal of the surge was to increase the visibility of officers as well as increase enforcement to reduce crime on the system and provide a safer environment for riders.

The initial surge by LAPD occurred between September 21, 2023, and January 31, 2024. Two days a week, LAPD increased staffing by eleven personnel, each working 10-hour shifts. This enhanced staffing resulted in, among other things, 309 arrests, 181 citations, and 241 ejections from the system.

The success of this initial surge resulted in another enhanced deployment in March of 2024. Between March 4, 2024, and March 14, 2024, SSLE coordinated a Multi-Layer Planned Deployment (MLPD) between Metro Transit Security and the law enforcement agencies. In this enhanced deployment, LAPD provided nine additional staff for 9-hour shifts on Monday through Thursday. This additional staffing resulted in 22 arrests, 2 citations, and 113 ejections. LASD conducted similar surge activities on December 16, 2023, and from May 1, 2024, through May 31, 2024. While not solely attributable to the surge efforts, crimes against persons dropped

25.1%, crimes against property dropped 34%, and crimes against society (such as narcotics and trespassing) dropped 53% for the period from November 2023 through April 2024.

Finding 22: Given the importance of providing a visible presence on the Metro system, surges of law enforcement presence have had a positive impact on the overall safety on the system. This increased visibility has been aided by increased coordination between the law enforcement agencies and Metro Transit security, facilitated by SSLE.

Recommendation 18: Due to the success of the surge in reducing criminal activity on the system, Metro should consider conducting periodic surge activities. These enhanced deployments can have a significant and prolonged impact on crime, as well as the public's perception of safety, even after the surge has concluded.

Ability to Respond to Emergencies and Extreme Events

The law enforcement agencies have policies and practices in place to respond to emergency calls on the system. While LAPD, LASD, and LBPD have staff dedicated to the Metro system, they are not limited to those resources. Calls for assistance from non-transit officers are always available, including calls for service from other local law enforcement agencies.

Moreover, the law enforcement agencies have procedures designed to respond to more extreme events such as terrorism, explosives and other human-caused and natural occurrences. For example, LASD's strategic plan has an initiative dedicated to preparedness to natural disasters, acts of terrorism, assemblies, protests, mass violence, and other unusual events. This includes facilitating quarterly training sessions involving Metro, Amtrak, and Metrolink, to enhance preparedness. These efforts also include integrating technology enhancements from Metro to "strengthen prevention and response efforts."

Similarly, LASD's Manual of Policies and Procedures details its response protocols for extreme events and emergencies. LASD's Sheriff's Response Team (SRT) is trained in riot control, mass arrests, protest response and acts of terror and will respond to those types of incidents on the transit system. Additionally, LASD's Transit Services Bureau (TSB) uses its K9 units to conduct proactive searches for explosives at Metro stations and these K9 officers are trained to be current on trends in terrorism, explosive recognition and other credible threats. Finally, the TSB's Special Assignment Unit is expanding its training programs to increase their capabilities with chemical, biological, radiological, nuclear and explosive incidents. These training programs are designed to expand their expertise in addressing potential hazards related to mass transit.

Finally, LBPD has several portions of its police manual setting forth policies and practices related to the prevention of extreme events such as terrorism. The manual details how the agency will respond to a mass event. Anti-terrorism efforts include detailed efforts to identify and report suspicious activities. Moreover, in the event of an extreme event, LBPD has developed criteria for identifying the nature of the event and the response procedures.

Finding 23: The law enforcement agencies have policies and practices to respond to calls for service that require additional non-transit staffing and those related to emergency and extreme circumstances.

Community Policing Efforts

The U.S. Department of Justice describes community policing as the focus “on crime and social disorder through the delivery of police services that includes aspects of traditional law enforcement, as well as prevention, problem-solving, community engagement, and partnerships.” Each of the three agencies espouse community policing practices. Set forth below is a high-level summary of these community policing policies and practices.

LAPD includes community policing policies within their strategic plan. In their Strategic Plan 2023 – 2025, Goal 1 focuses on their strategies to “Protect Los Angeles” and includes seven initiatives, one focused solely on reducing crime related to the Metro system. Within these initiatives, LAPD includes several activities related to community policing including using a Community Safety Partnership relationship-based approach to policing. This approach is based on fostering community interactions within foot beat patrols, training officers on crime prevention strategies, and working more closely with Metro to improve training. LAPD also emphasizes in the plan that it engages in monthly “wrap sessions” with bus operators to emphasize their proactive approach and develop trust between the agency and Metro staff.

The Transit Services Bureau within LASD prepared Community Policing Plans for both FY23 and FY24. These documents walk through the multi-layered services provided by the agency by focusing on transit policing from a community-based perspective. This multi-layered system includes two units primarily focused on community-oriented services:

- *Transit Mental Evaluation Teams* – teams that respond to mental health crises and homelessness issues on the system. These teams include sworn officers and clinicians from the LA County Department of Mental Health.
- *Commuter Enhancement Team* – deputies that provide high visibility on Metro’s platforms and trains including practices to engage patrons and operators to ensure their concerns are heard and they feel safe riding the system.

LBPD police officers, including those that serve transit, are trained in community policing. Each geographical division within the city has proactive teams consisting of sworn employees and civilian support staff who promote personal safety and crime prevention. Beat officers conduct “walk and talks” by periodically stopping their patrols to discuss with the community members issues of importance to the public. Along with beat officers, representatives from LBPD represent the department at neighborhood meetings, community events, business meetings, and nonprofit group functions.

Finding 24: All three law enforcement agencies have policies and strategies that implement community-based policing. While it is difficult to effectively measure the effectiveness of community policing with the given metrics collected by SSLE, one key metric is visibility. As recommended in Section A above, LAPD and LBPD need to more effectively demonstrate their overall visibility on the system.

Recommendation 19: Metro should consider developing and collecting data on the effectiveness of the agencies' community-based policing efforts. Such metrics could include survey data from customers and Metro staff, and the number of community events each agency participates in related to transit services.

Law Enforcement Programs Tailored to Transit Environment

As discussed above, SSLE has developed a process to work with the law enforcement agencies and other SSLE assets to provide a more tailored and coordinated presence on the transit system. In July 2023 and in collaboration with the law enforcement agencies, SSLE developed a multi-layered deployment approach.

SSLE identified four key strategies for assessing security needs on the system and identifying effective deployment strategies:

- ***Strategic Coverage*** – providing strategic coverage using flexible staff and roving teams of officers to ensure coverage of all areas of the Metro system and ensure a highly visible presence for customers.
- ***Targeted Deployment*** – targeting deployments to focus on high-crime areas, especially those areas experiencing high numbers of drug-related offenses and Code of Conduct violations help reduce criminal activity.
- ***Public and Community Engagement*** – conducting regular engagement with the public to fostering public trust, build relationships and gather valuable feedback on safety concerns on the system.
- ***Training for Emergencies and High Stress Situations*** – training on a regular basis to improve how officers respond to overdoses, medical emergencies, and other high-stress incidents.

On Monday of each week, the law enforcement agencies meet with SSLE (including MTS and Metro Ambassador leadership) to discuss the prior week's crime trends, identify any anticipated events and adjust deployments appropriate to the emerging trends on the system.

As an example of this process, the law enforcement agencies and SSLE identified 80 unique locations from various data sources including crime statistics, arrests, the transit watch app, social media, informal rap sessions with employees, employee feedback and law enforcement service requests. From this data, they identified 36 "pain point" locations for targeted deployments. "Pain point" locations are areas of high crime and/or code of conduct violations.

The goal of identifying these “pain point” locations was to develop a deployment strategy to ensure 100% presence of security, law enforcement or Ambassadors in those areas. The goal was to deter criminal activity and, where necessary, respond to calls for services more quickly. Set forth below in Table 27 is a sample deployment within the 36 locations identified as “pain points”:

Table 27: Sample “Pain Point” Deployment Schedule

	Station	Fixed	Riding Teams	Roving/Patrol	LE Fixed	LE Train Riding	LE Rover	Ambassador Fixed	Ambassador Rover
1	7th Street / Metro Center	4			4			12	10
2	Allen		2			2	4		6
3	Chatsworth			2			4		2
4	Chinatown		2			2			2
5	Downtown Long Beach	6			2				2
6	Downtown Santa Monica	8			2				2
7	Expo / Crenshaw		2			2			2
8	Expo / La Brea		2			2			2
9	Expo / Vermont					2			2
10	Grand / LATTC		2			2			2
11	Grand Av Arts / Bunker Hill	2			4			4	2
12	Harbor Freeway	2				2			8
13	Harbor Gateway Transit Center	2					4		2
14	Hawthorne / Lennox		2			2			8
15	Hollywood / Highland	2				2			2
16	Hollywood / Vine	4				2		2	2
17	Hollywood / Western	2				2		2	2
18	Indiana		2				2		2
19	La Cienega / Jefferson		2			2			2
20	LATTC / Ortho Institute		2			2			2
21	Little Tokyo / Arts Dist	2				2		2	
22	North Hollywood	10				4		4	4
23	Pershing Square	2							2
24	Pico		2			4			
25	Redondo Beach	2					6		2
26	Reseda	2		2			4		2
27	Sierra Madre Villa	2				2	4		2
28	Slauson		2			2			2
29	Union Station	10			4	2		12	4
30	Universal City / Studio City	2				4		16	
31	Vermont / Santa Monica	2				2			2
32	Vermont / Sunset	2				2			2
33	Westlake / MacArthur Park	4			4			6	2
34	Willowbrook / Rosa Parks	8			4		6		10
35	Wilshire / Vermont	4			2	2		16	2
36	Wilshire / Western	2				2			2

The data sets that formed the basis of the above deployment are updated regularly to identify “pain points” and allow for real time adjustments in the overall deployment of all SSLE assets.

Finding 25: Working with SSLE, the law enforcement agencies have expanded their use of data to tailor their services more effectively to deter crime. Data from a diverse mixture of sources are used to identify areas within the system that are experiencing higher than usual Code of Conduct violations and criminal activity. SSLE and law enforcement then use this data to tailor deployments and address these “pain point” areas on a regular basis.

Consistency with Eight Can’t Wait

In June 2023, LAPD, LASD and LBPB amended their agreements with Metro to include language that each agencies’ policing activities would be consistent with the principles of “Eight Can’t Wait.” The “Eight Can’t Wait” principles developed by Campaign Zero advocates for law enforcement agencies to adopt eight reforms designed to reduce police violence:

- *Ban Chokeholds and Strangleholds* -- “Both chokeholds and all other neck restraints must be banned in all cases.”
- *Require De-Escalation* -- “Require officers to de-escalate situations, where possible, by communicating with subjects, maintaining distance, and otherwise eliminating the need to use force.”
- *Require Warning Before Use of Deadly Force* -- “Require officers to give a verbal warning in all situations before using deadly force.”
- *Exhaust All Alternatives Before Use of Deadly Force* -- “Require officers to exhaust all other alternatives, including non-force and less lethal force options, prior to resorting to deadly force.”
- *Duty to Intervene* -- “Require officers to intervene and stop excessive force used by other officers and report these incidents immediately to a supervisor.”
- *Ban Shooting at Moving Vehicles* -- “Ban officers from shooting at moving vehicles in all cases.”
- *Require Use of Force Continuum* -- “Establish a Force Continuum that restricts the most severe types of force to the most extreme situations and creates clear policy restrictions on the use of each police weapon and tactic.”
- *Require Comprehensive Reporting* -- “Require officers to report each time they use force or threaten to use force against civilians. Comprehensive reporting includes requiring officers to report whenever they point a firearm at someone, in addition to all other types of force.”

To evaluate whether the agencies follow these principles, this audit (1) reviewed existing policies and identified where in their directives or California government code the principles are articulated and (2) reviewed (when available) a sampling of each agencies' Use of Force reports related to their patrol of the system to confirm that those policies are being applied in practice.

Law Enforcement Agencies Policies and Directives

As part of reviewing the overall application of "Eight Can't Wait", a review was conducted of each agency's policies to ensure that the core principles are documented and part of the overall practices of the agency. Table 28 below indicates each of the principles of "Eight Can't Wait" and indicates where in each agency's directives or the California Government Code the principles are articulated.

Table 28: Eight Can't Wait

8 Can't Wait Principle	LAPD	LASD	LBPD
Require De-Escalation	Use of Force –Directive 1 September 2023 Policy <u>Use of De-Escalation Techniques</u>	LASD Manual 3-10.009.00 <u>Force Prevention and De-Escalation Principles</u>	Manual of LBPD 10.3.3 <u>De-Escalation</u>
Require Use of Force Continuum	Use of Force –Directive 1 September 2023 Policy <u>Proportionality</u> <u>Factors Used to Determine Reasonableness</u>	LASD Manual 3-10/004.00 <u>Use of Force Terms Defined Proportional</u>	Manual of LBPD 10.5 <u>Totality of Circumstances Proportional</u>
Ban Chokeholds and Strangleholds	2023 Dept. Manual-1st Quarter 214.50 <u>Government Code Ch. 17.4 Section 7286.5</u>	LASD Manual 3-10/025.00 - Carotid Restraint and Choke Holds <u>Government Code Ch. 17.4 Section 7286.5</u>	Manual of LBPD 10.12.1 <u>Carotid/Neck Restraint</u> <u>Government Code Ch. 17.4 Section 7286.5</u>
Require Warning Before Use of Deadly Force.	Use of Force –Directive 1 September 2023 Policy <u>Verbal Warnings</u> <u>CA Penal Code 835a</u>	LASD Manual 3-10/045.00 <u>Use of Deadly Force and Firearms</u>	Manual of LBPD 10.3.4 <u>Verbal Warnings</u> <u>CA Penal Code 835a</u>
Ban Shooting at Moving Vehicles	Use of Force –Directive 1 September 2023 Policy <u>Shooting at or From Moving Vehicles</u>	LASD Manual 3-10/055.00 <u>Use of Firearms Against Vehicles and/or Occupants of Vehicles</u>	Manual of LBPD 10.5.4 <u>Police Officer – Shooting at Moving Vehicles</u>
Exhaust All Alternatives Before Use of Deadly Force	Use of Force –Directive 1 September 2023 Policy <u>Use of Force-Deadly</u> <u>Department's Evaluation of Deadly Force Objectively Reasonable</u>	LASD Manual 3-10/004.00 Proportional 3-10/009.00 <u>Force Prevention and De-escalation Principles</u>	Manual of LBPD 10.5 <u>Police Officer – Force Policy Objectively Reasonable</u>
Duty to Intervene	Use of Force –Directive 1 September 2023 Policy <u>Requirement to Intercede When Excessive Force is Observed</u>	LASD Manual 3-10/030.00 <u>Unreasonable Force and Duty to Intervene</u>	Manual of LBPD 10.3.2 <u>Duty to Intervene</u>
Require Comprehensive Reporting	LAPD Dept Manual 4/245.05 Use of Force –Directive 1 September 2023 <u>Drawing or Exhibiting Firearms</u>	LASD Manual 3-10/100.00 Use of Force Reporting - Dept. Member Responsibilities 3-10/038.00 - Reportable Use of Force and Force Categories	Manual of LBPD 10.9.1 <u>Use of Force -Involved Employee Responsibilities</u>

Finding 26: Each of the law enforcement agencies have policies and directives that are consistent with the principles of “Eight Can’t Wait.”

Review of Use of Force Reports

To evaluate whether LAPD, LASD and LBPD’s policing practices are consistent with the principles of “Eight Can’t Wait”, this study sought to review a sampling of each agency’s Use of Force reports related to their policing of Metro’s system. California codified the practice of requiring use of force reports by mandating that law enforcement agencies report to DOJ any use of force by a peace officer against a civilian that results in serious bodily injury or death. (Government Code section 12525.2(a)(2)).

Use of force reports are essential to both safeguard the rights of the public and to preserve the integrity of the law enforcement agency by providing a detailed look at each time an officer uses force against a member of the public. Use of force is defined by the International Association of Chiefs of Police (IACP), as:

“[U]se of force is the amount of effort required by law enforcement to achieve compliance or overcome a subject’s physical resistance to any command, arrest, or detention..... Use of force may include, but is not limited to, use of chemical or electronic force; open-handed strikes, punches, or kicks; displaying a firearm for purposes of compelling compliance; discharging a firearm; or using physical intervention with a vehicle that could reasonably result in injury or death.”

As part of this review, a request was made to each law enforcement agency to provide access to their use of force reports for incidents that occurred on Metro’s system during the audit period. This request was made pursuant to the contractual requirement within their agreements that the agencies provide Metro with relevant documentation related to the provision of their services.³

Los Angeles Police Department

For the calendar year 2023 and approximately the first three quarters of calendar year 2024, LAPD recorded 162 use of force incidents. Overall, the use of force incidents primarily occurred on the rail system (82%) with a smaller percentage occurring on buses or other locations (18%). Most incidents arose from visual observation by LAPD officers with the remaining incidents being reported by citizens or radio calls from security. LAPD also breaks down the data by race,

³ An example of this requirement from Metro’s contract with LASD (Modification #5) states:

"Contractor will collect and report data consistent with local, state, and federal laws and regulations. LACMTA related data will be provided upon LACMTA's request." (See, 2.0 Reporting Requirements)

gender, age, homeless status, mental health condition, and booking charges and reasons for contact.

As part of this study, a random sample of 5 use of force reports from 2023 and 5 from 2024 were reviewed. The use of force reports included a summary of the incident, statements by witnesses and evaluation reports from supervisors and other senior officers. The summaries included information related to the reason for the contact, the steps taken by officers to interview or detain the suspects' actions, the nature of the use of force and efforts used to de-escalate prior to the use of force.

The two most common reasons for the initial contact with suspects involved trespassing or confronting individuals threatening Metro customers or employees. The types of force applied ranged from striking suspects in self-defense, use of firm grips, use of body weight to detain or subdue a suspect, physical restraint of arms and chest, physical takedowns and use of joint locks (holds that are applied to an opponent's joints to force them to submit).

As part of the review, the officers' actions were evaluated against the applicable "Eight Can't Wait" principles. While the individual incidents did not directly involve all aspects of the Eight Can't Wait campaign, each file contained enough details to address the principles applicable to the occurrence. The two most common principles at issue related to ensuring that the officers made reasonable attempts at de-escalation and only using force necessary or appropriate for the resistance offered by the suspect. The files displayed a consistent application of the related use of force policies that contain the principles of "Eight Can't Wait."

It is relevant to note that in a small number of the incidents, the use of force reports indicated that the responding officers were counselled on how they handled the overall incident including requiring officers to participate in additional training on departmental policies. These were minor violations that did not impact the principles of "Eight Can't Wait." These corrective actions validate that the overall policies and procedures for LAPD are internally actionable and, if violated, officer's conduct will be formally addressed.

Finding 27: In a sample review of LAPD use of force reports that occurred during the audit period, no significant instances of non-compliance with the principles of "Eight Can't Wait" were identified.

Long Beach Police Department

For the audit period, LBPDP reported 2 use of force incidents. As part of this study, both use of force reports was reviewed to evaluate compliance with the principles of "Eight Can't Wait."

In the first incident reviewed, officers were involved in attempting to remove an intoxicated passenger who was sleeping on a train that was no longer in service. The use of force involved the physical removal of the individual from the train that included grabbing her wrists and arms after being spit on and holding on to a pole within the train to obstruct removal.

In the second incident reviewed, use of force was applied to break up a verbal and physical altercation between two male customers on a train platform. To prevent further physical contact between the two customers, the officers grabbed the individuals by the wrists and arms, as well as pushing the suspects away from each other.

In both incidents, the use of force reports was reviewed to identify any actions that might be contrary to applicable principles. In neither incident were the actions of the officers inconsistent with “Eight Can’t Wait.” Furthermore, there is no indication that any of the officers involved needed to receive any type of corrective action.

Finding 28: In a review of LBPd’s use of force reports that occurred during the audit period, no instances of non-compliance with the principles of “Eight Can’t Wait” were identified.

Los Angeles Sheriff’s Department

For the audit period, LASD recorded 142 use of force incidents. As part of this review, we reviewed a random sample of 10 use of force reports, 5 each from FY 2023 and FY2024. The use of force reports included a summary of the incident prepared by the deputy involved. Like the LAPD and LBPd reports, the summaries included information related to the reason for the contact, the steps taken by officers to interview or detain the suspects’ actions, the nature of the use of force and efforts used to de-escalate prior to the use of force.

As with the other agencies, the usual reason for the initial contact with suspects involved trespassing (or removing riders at the end of the line) or confronting individuals who have threatened Metro customers or employees. The most common type of force applied ranged from physical actions necessary to restrain a suspect such as the use of body weight or firm grips. In each instance reviewed, the files displayed a consistent application of the related use of force policies that contain the principles of “Eight Can’t Wait.”

Finding 29: In a sample review of LASD use of force reports that occurred during the audit period, no significant instances of non-compliance with the principles of “Eight Can’t Wait” were identified.

Recommendation 20: SSLE should annually conduct a sample of it choosing to review of use of force reports prepared by the law enforcement agencies to review whether the agencies’ practice comply with the principles of “Eight Can’t Wait.”

E. Metro System Security and Law Enforcement Department Non-Law Enforcement Personnel and Activities

Metro's System Security and Law Enforcement (SSLE) Department is charged with the ongoing oversight of the contracted law enforcement services as well as the operations of other Metro safety and security resources. The purpose of this task is to review and evaluate oversight and supervision of contracted law enforcement services and document how additional safety and security resources compliment those services. To accomplish this, we performed the following analyses:

- Evaluated the adequacy of SSLE's oversight of the law enforcement services contracts to ensure compliance with contract requirements.
- Documented what services Metro has within the SSLE unit to address other safety and security issues facing Metro and whether those services appear to be addressing the needs of the agency.
- Considered whether the non-law enforcement supplemental services support law enforcement and address the safety and security issues facing Metro.

SSLE Oversight of Law Enforcement Services Contracts

SSLE is responsible for the monitoring and oversight of the law enforcement contracts on behalf of Metro. This oversight is to confirm that contractual requirements are being complied with and ensure that *the law enforcement agencies are providing a visible presence on the system to address and deter criminal activity.*

During the last several years, previous audit reports have identified the oversight of these contracts as a significant concern, and numerous recommendations have been made to strengthen SSLE's processes. Specifically, past reports have included recommendations to validate officer visibility on the system including SSLE conducting on-site field reviews, enhancements to the use of TAP cards to track law enforcements' movements in the field, and the implementation of GPS technology to track law enforcement deputies' locations. SSLE has made strides in improving its monitoring and oversight, but as discussed below, continued efforts are needed to ensure compliance.

Set forth below, we discuss how SSLE has made improvements in safety and security resources to improve overall visibility on the system and their efforts to validate law enforcement presence on the system.

SSLE Efforts to Achieve Law Enforcement Visibility on the System

As will be discussed more fully below in the section entitled "Documenting SSLE Resources Deployed to Address Safety and Security", SSLE has implemented a new approach for how it

deploys resources on the system entitled the “Multi-Layer Planned Deployment.” The approach establishes a multi-layered deployment of resources to address emerging safety and security issues on the system. The plan uses real-time data to identify “hot spots” on the system by categorizing high-risk stations and rail lines. This data is then used to isolate targeted stations and lines and develop a coordinated deployment strategy utilizing each of SSLE’s key resources. In addition to this multi-layered approach, SSLE developed a more comprehensive set of strategies to address safety and security concerns on this system through its FY24 Annual Workplan (FY24 Workplan). The FY24 Workplan builds on the multi-layered approach and applies similar principles throughout the entire system.

To more effectively implement these new approaches, SSLE holds weekly deployment meetings with the law enforcement agencies and its other safety and security resources. The purpose of these meetings is to review current crime and misconduct data by location and evaluate whether deployments should be adjusted. These meetings are also used to discuss any specific campaigns to be implemented (e.g. drug free campaign, etc.) or other operational issues. According to our interviews with the law enforcement agencies and SSLE, these meetings have significantly improved communication and coordination between the parties. The agencies are better able to reach consensus on areas of concern on the system and how to utilize all Metro resources to address them.

Finding 30: SSLE’s multi-layered deployment approach has significantly improved the coordination and collaboration between itself, the law enforcement agencies and other Metro safety and security resources. This coordination is enhanced by more productive weekly meetings between the parties that focus on current conditions and targeted deployments.

SSLE Efforts to Validate Law Enforcement Visibility on the System

A critical element of SSLE’s monitoring and oversight of the law enforcement agencies is focused on ensuring law enforcement personnel are on the system as assigned. In 2021, SSLE developed and implemented a *Compliance Review Standard Operating Procedure* (SOP). The SOP outlines an approach to conduct reviews to ensure that billings are consistent with the contract terms and ensure that contracted law enforcement personnel are present and providing the relevant services.

As discussed in more detail in Task A of this report entitled “Visibility of Contract Law Enforcement Personnel”, Metro primarily relies on three means of validating law enforcement’s presence on the system: field reviews, CCTV footage and reviews of weekly deployment sheets. While SSLE should continue to employ those means in the short term, we found that these tools are not a cost-effective means to routinely and independently verify the law enforcement agencies’ actual presence. Moreover, these tools do not represent a comprehensive monitoring and oversight mechanism, and it is recommended that SSLE continue to work with the law enforcement agencies to develop a more efficient and cost-effective means to validate their

presence and activity on the system. This recommendation includes evaluating whether it is feasible to implement LASD's DAL system across all the law enforcement agencies.

Key Performance Indicators (KPIs) and Establishing Baselines

While the implementation of the multi-layered approach has meaningfully improved SSLE's coordination of its safety and security resources, SSLE still has not developed an effective system for collecting KPI data from the law enforcement agencies. Moreover, SSLE has not developed specific baselines for those KPIs.

The contracts with the law enforcement agencies require the collection of several KPIs that are designed to allow Metro to evaluate the effectiveness of the law enforcement services. These KPIs include, but are not limited to, the monthly number of foot and vehicle patrols, and the monthly number of bus and train boardings, key elements for evidencing law enforcement visibility on the system. The law enforcement agencies, however, do not universally provide actual data for these KPIs. For example, the following represents the data collected with respect to foregoing KPIs during the audit period:

- *Rail Boardings:*
 - LAPD -- did not report boardings and rides for either fiscal year.
 - LASD -- did not report boarding and rides for FY23.
 - LBPD -- reported data that represents the estimated number of rail boardings and rides based on protocols and schedules, but they do not track actual boardings and rides.
- *Foot Patrols (Bus and Rail combined):*
 - LAPD -- for both FY23 and FY24, LAPD reported statistics that represent the estimated numbers of foot patrols based on protocols and schedules developed by the agency.
 - LASD -- reported the estimated numbers based on scheduling for FY23 but for FY24 provided the actual number of foot patrols for the year.
 - LBPD -- for both FY23 and FY24, LAPD reported statistics that represent the estimated numbers of foot patrols based on protocols and schedules developed by the agency.
- *Vehicle Patrols:*
 - LAPD -- does not have assigned vehicle patrols to the Metro system but uses existing non-system assigned patrol units to respond to calls, so no reporting is required.

- LASD -- did not report any vehicle patrol data for FY23, but did report their annual numbers for FY24.
- LBPD -- reporting is based on an estimate of patrol hours based on existing schedules, not based on actual data.

Finding 30: SSLE does not routinely collect all KPI data as required by the law enforcement contracts. Moreover, some of the data that is collected represents estimates based on the presumed schedules of staff and are not based on actual numbers.

Recommendation 21: SSLE should collect data on each of the KPIs listed in the law enforcement contracts. Where possible, this data should be based on actual numbers, not estimates associated with scheduled personnel assignments.

Setting baselines for KPIs is critical to providing quantifiable benchmarks for measuring progress towards strategic goals, enabling organizations to track performance, identifying areas for improvement, and making data-driven decisions. KPIs promote accountability and provide motivation for organizations to improve performance.

Previous reports have emphasized the need for SSLE to establish performance baselines for KPIs to provide guidance to the law enforcement agencies as to acceptable levels of visibility, but also to hold them responsible for failures to achieve those baselines. These baselines could be included within future workplans and become a part of the weekly discussions between SSLE and the law enforcement agencies.

Finding 31: SSLE has not established baselines for the KPIs defined in the law enforcement contracts.

Recommendation 22: SSLE should develop annual baselines for the KPIs set forth in the law enforcement contracts. This should include baselines for key visibility KPIs including rail and bus rides, vehicle patrols and foot patrols. These goals can and should be adjustable based on changes in deployments or changes in strategic focus. This recommendation is consistent with recommendations made in prior reports.

Documenting SSLE Resources Deployed to Address Safety and Security

SSLE is tasked with implementing Metro's public safety mission statement to "safeguard the transit community by taking a holistic, equitable, and welcoming approach to public safety." As part of their roles and responsibilities they provide an oversight of a multifaceted deployment of resources that include the following:

- *Contract Law Enforcement* -- LAPD, LASD and LBPD provide law enforcement services on Metro's transit system.
- *Metro Ambassadors* – Ambassadors provide a visible presence on the system to enhance riders' sense of personal safety and security by helping the riders navigate the system,

anticipate their needs, proactively engage customers and connect vulnerable riders to resources. Ambassadors also may call law enforcement if there is a safety incident.

- *Metro Transit Security (MTS)* -- MTS provides security at Metro facilities through mobile security units. These units patrol the various Metro facilities and provide a visible security presence for those facilities including riding buses, walking transit stations and enforcement for code of conduct violations. These units also oversee the contracted private security personnel that are posted throughout Metro facilities.
- *Contract Security* – Contract Security is responsible for the protection of Metro’s critical infrastructure and facilities including bus divisions, maintenance divisions, terminals, stations, and specified parking lots.
- *Homeless Outreach Teams* – Metro Homeless Outreach teams provide specialized care functions helping people access housing and other vital services to deter sheltering on the Metro system. Outreach teams also carry naloxone (a medicine to reverse Opioid overdoses) to help prevent overdose deaths on the system.

Multi-Layer Planned Deployment

In July 2023, SSLE sought to refine the way in which these resources were deployed by developing an approach entitled the Multi-Layer Planned Deployment plan. The goal of this approach is to deliver a cost-effective, multidisciplinary set of resources that provide enhanced coverage and visibility to deter crime and give riders and Metro staff a greater sense of safety and security. The approach emphasizes employing the most effective resource based on the nature of the task and deploying enhanced resources to areas at higher risk for criminal activity. Teams are deployed in the following categories: End of the Line Stations, Focus Stations, Riding Teams, and Station Rovers. Set forth below is a summary of the objectives and tasks for each of these designated assignments.

End of the Line Stations

End of the Line (EOL) stations have unique safety and security challenges. Being at the beginning and end of each service, EOL stations often face overcrowding, unhoused riders remaining on the system, and increased criminal activity. To address these issues, Metro’s multi-layered plan increases visibility at EOL stations by providing an additional security presence (law enforcement, MTS and Contract Security) and customer service assistance from Ambassadors.

The increased law enforcement and security presence protects against loitering, deters criminal activity and helps to ensure a safe environment for custodial cleaning efforts and rail operators. The increased Ambassador presence improves the overall customer experience, assists customers along in finding accessible transit connections, and creates opportunities to connect people experiencing homelessness with partner or local care-based agencies.

Focus Stations

As part of addressing increased criminal activity on the system, Metro has sought to identify “hot spots” on the system where there exist risks of higher criminal activity and code of conduct violations. Adhering to the Board approved Bias-Free Policing Policy and other anti-discrimination measures that limit the use and collection of crime data in specific ways, SSLE uses a combination of methods to identify these “hot spots.” To begin the process, Metro gathered feedback from riders about how they value the presence of safety resources on the system. The feedback from customers emphasized the desire for a balanced approach to providing safety and security throughout the system (e.g., avoid a strong focus on just one type of service).

To complement the user feedback, SSLE selected different measures to assess areas of greatest need. It selected three datasets to help identify areas of safety concern including the top 20 rail stations by Crimes Against Persons, the top 2 rail lines by Crimes Against Persons, and the top 10 bus lines by Operator Assaults. Focus stations were then identified based on these datasets to maximize the impact of additional resources by using a balanced approach to assigning safety teams.

Once these focus stations were identified, SSLE created a deployment that increased both the use of MTS and Ambassadors at these stations. MTS creates a visible presence at the station to deter unwanted behavior, prevent re-entry of fare evaders exited from the system, and report on any safety and security issues. Ambassadors create additional visibility, enhance customer experience, and report incidents of safety concerns and lack of cleanliness at the stations.

Riding Teams

New riding teams were developed to ride trains between three different rail stations. These teams were comprised of members of MTS, the law enforcement agencies and the Ambassadors. MTS and the law enforcement agencies are tasked with deterring illicit activity and code of conduct violations, increasing riders and employee confidence in a safe system, and reducing fare violations. The Ambassadors primary role is to improve the overall customer experience and reporting safety and cleanliness issues. SSLE uses a similar system to identify Focus Stations to determine which three lines to use for the riding teams.

Rover Stations/Locations

The final part of the new deployment approach involves the creation of Rover Stations for the deployment of Ambassadors, Contract Security the law enforcement agencies. This strategy is focused on developing a sustained presence of law enforcement and Contract Security across the system where resources may otherwise be sparse. Contract Security provides visibility at designated stations, responds to calls for service and reports on safety and security issues. Law enforcement agencies provide high visibility at key stations and respond to criminal activities as well as keeping the area free from loiterers. Ambassadors ride trains and buses and exit at

designated stations to both enhance customer experience and conduct station checks (including elevator and escalator checks).

To assist with implementing rover stations, the OIG agreed to allow Ambassadors to assemble for morning assignments and debrief at end of shifts in the Transit Court South space at Willowbrook station.

Table 29 below is a sample of staffing by resource for multi-layered deployment:

Table 29: Sample Multi-Layer Planned Deployment – Targeted Stations

Multi-Layer Planned Deployment -- Effective 11/13/23										
Line	Target Stations	End of Line	MTS (am and pm)	Ambassadors (Planforms/Riding am and pm)	Outreach Teams (Roving)	CS (am and pm)	LAPD W2, W4 & W3	LAPD (am, pm and em)	LBPD (am and pm)	Total LE and Security
E	DTSM	X	4	0	1	0		2		6
E	Expo/Western (F)		2	0	1	0	0		0	2
E	Atlantic	X	2	0	1	2		2	2	6
A (ADD)	Willow St. (F)		2	0	0	0				2
A	DTLB	X	4	0	1	2		4		8
A/C	Willowbrook/Rosapark (F)		6	0		2		2		12
C	Norwalk	X	0	0	0	2		2		4
C	Redondo Beach	X	0	0	0	2				4
A	Chinatown Arcadia Lake (F)		2	0	0	0	0	2		2
A	APU/Citrus College	X	2	0	0	2				6
B/D	Union Station (B/D)	X	4	2	1	2	2			8
B	North Hollywood	X	4	6	1	2	4			10
B	Westlake/McArthur Park		2	6	1	2	4			8
B	Vermont/Santa Monica (F)		4	0	1	2	0			6
Riding Between Stations										
E	Expo/Crenshaw to Expo		1	2	0	0	2			3
B	Vermont/Sunset to Western		1	2	0	0	2			3
A/C	Compton to LB Blvd		1	10	0	0		2		3
A	APU to Irwindale		0	6	0	0		2		2
A	Union to Lincon to Monrovia		1	0	0	0		2		3
E	Indiana to Atlantic		0	2	0	0		0		0
A (ADD)	Pacific Ave to Willow St.		1	0	0	0		0	2	3
Rove (Mobile Unit)										
C	Hawthorne to Athens		1	0	0	0		0		
Total			44	36	8	20	14	20	4	102

Cost Effectiveness of a Multi-Layered Deployment Approach

The multi-layer approach described above has the advantage of increasing visibility on the system in a more cost-effective manner than solely using the law enforcement agencies. By using resources from MTS, Contract Security, Ambassadors and Homeless Outreach services, Metro can significantly reduce the hourly costs associated with establishing an additional presence on the system. Table 30 below summarizes the FY24 average hourly costs per public safety layer and shows how using resources beyond the law enforcement agencies, SSLE can increase visibility at a much lower percentage of the costs.

Table 30: Hourly Service Level Cost by Type of Resource

Service Level Costs	
Public Safety Layer	Fully Burdened Cost
LAPD	\$187.66
LASD	\$119.75
LBPD	\$158.55
Metro Security (Unarmed)	\$41.74
Metro Security (Armed)	\$55.11
Contract Security	\$43.70
Ambassador	\$40.01
Homeless Outreach	\$64.92

In determining how to best deploy its resources, SSLE looks to balance several variables including the cost of service, its appropriateness for the task at hand, and the effectiveness of each deployment. In other words, while law enforcement agencies may be required to respond to more violent crime activities, day-to-day interactions on public transit can be more efficiently managed by less costly internal or contracted security staff. By utilizing lower cost alternatives, Metro can address ongoing safety concerns and the desire for increased visibility in a more cost-effective manner.

Review of the Non-Law Enforcement Transit Safety and Security Resources

This section will review the three key resources that have been re-aligned as part of the multi-layered deployment to identify their enhanced responsibilities and how they are supplementing the roles played by the law enforcement agencies: Contract Security, MTS, and Ambassadors.

Contract Security

Contract Security is responsible for the protection of Metro's critical infrastructure and facilities including bus divisions, maintenance facilities, terminals, and stations. This includes patrolling and securing facilities, crowd control for special events and bus bridges. Contract security officers also offload trains at the end-of-line (EOL) stations. This operation deters patrons from riding the system without a valid fare and allowing Metro staff to clean the trains and provide security support for Metro employees performing their duties. Contract security personnel are certified by the Bureau of Security and Investigative Services, a state agency that licenses and regulates private security services.

SSLE has enhanced the role of contract security as part of its multi-layered deployment strategies. In July 2023, Metro entered into an agreement for private security services with Universal Protection Service (for the North region) and Inter-Con Security Systems (for the South region). The service was broken into two regions to allow for increased coverage of Metro infrastructure and facilities. The contract's scope of services is designed to protect critical infrastructure, improve security at bus/rail facilities and provide a level of reassurance for Transit Ambassadors and Homeless Outreach Teams at transit stations. The new contract increased overall staffing from 2,093 daily hours provided by 261 staff to 2,592 hours provided by 372 staff. This represents an increase of approximately a 42.5% increase in staffing and a 24% increase in total daily hours.

In addition to increased staffing, SSLE has also enhanced the ability of contract security to address unlawful behavior. Historically, when contract security observed an incident, they would contact one of the law enforcement agencies to provide a law enforcement response. With the new contract, Metro has changed its approach to allow private security to "engage" bad actors. Where contract security observes activity such as trespassing, graffiti, assault, or other disorderly conduct, they can detain those individuals until law enforcement arrives to make an arrest and process the individual.

MTS is responsible for oversight of contract security. Deployments are generally predetermined with deployment at every subway station and dedicated staffing for end of the line stations during the hours from 6:00 a.m. to 10:00 p.m. Contract Security also have roving patrols to address areas experiencing higher incidents of disruption or illicit activity. MTS works in collaboration with the other elements of the multi-layered deployment to determine when and where roving patrols should be deployed.

Finding 32: At less than half the cost of law enforcement personnel, contract security provides an efficient means to protect Metro's infrastructure while at the same time providing a level of overall deterrence of criminal behavior at Metro facilities.

Metro Transit Security (MTS)

MTS provides security for Metro facilities and operations to ensure a safe transit environment for Metro employees, patrons and Metro property. This includes the bus division facilities, bus and rail maintenance facilities, parking lots, and other facilities. Their responsibilities include code of conduct enforcement, opening/closing stations, bus and train riding, de-escalation of potential incidents, revenue collection and administration of naloxone, also known as Narcan and CPR, if necessary.

In March 2023, the Metro Board approved the funding to hire 48 additional MTS officers to create a permanent bus riding team that is deployed to those lines experiencing higher frequencies of public safety issues. The role and responsibilities of MTS have expanded substantially over the past few years and now includes primary responsibility for enforcing Metro's Customer Code of Conduct on the system, including fare enforcement.

Enforcing fare compliance with the Metro system, as well as the Metro Customer Code of Conduct is a key element of Metro's safety and security mission. Table 31 shows the citations for Metro Customer Code of Conduct violations, including those related to transit fares. The number of Metro Customer Code of Conduct violation citations increased substantially following the implementation of the multi-layered deployment approach, increasing by 58%.

Table 31: MTS Citations for Code of Conduct Violations

Citations for Customer Code of Conduct Violations	
Fiscal Year	Citations
FY23	3,837
FY24	6,069

Parking enforcement is also an important function to ensure safety and that vehicles do not interfere with Metro bus and rail operations. The following Table shows the citations for parking violations issued by Metro Security during FY 2023 and FY 2024. Table 32 below shows there was a 25% increase in parking citations between FY23 and FY24.

Table 32: MTA Citations for Parking Violations

Citations for Parking Violations	
Fiscal Year	Citations
FY23	10,212
FY24	12,779

Finding 33: MTS provides a cost-effective approach to enhancing security on Metro's system. The enhanced use of their services has resulted in significant increases in Code of Conduct citations. Their increased presence and their active role in issuing citations

provides a heightened level of security and represents a deterrent to criminal behavior on the system.

Metro Ambassadors

Metro Ambassadors began as a three-year pilot program in October 2022. Ambassadors provide a visible presence on the system to provide support to riders. The goal is to improve customer experience by helping riders navigate the system, proactively engage and connect with customers and assist vulnerable riders. Ambassadors also alert other elements of Metro's safety and security system about criminal activity (law enforcement agencies), Code of Conduct violations (MTS), cleanliness and other maintenance issues, and the presence of vulnerable riders who may need care-first support (Homeless Outreach Teams). They also provide lifesaving assistance by providing CPR and Narcan where necessary.

Most Ambassadors are deployed as part of riding and roving teams to support customers in areas of higher risk of criminal activity. They are also deployed to support large events (e.g. concerts, sporting events, etc.), service disruptions (e.g. bus shake-ups, etc.) and special security deployments (e.g. anti-drug campaign, surge deployment, etc.).

SSLE has developed a system of KPIs to help measure the success of the Metro Ambassador program. The primary measurement involves overall "engagements" with customers. Engagement includes any form of interaction with a customer that provides them assistance (beyond a greeting). They also measure how often they interact with other Metro safety and security resources by reporting critical issues to be addressed. Finally, they measure the impact of their safety training (i.e. use of Narcan, CPR, suicide interventions, etc.).

From October of 2022 through June of 2024, the Ambassador's program has recorded the following KPIs:

- ***Ambassador Engagements:***
 - 1,134,944 individual engagements
- ***Cleanliness and Maintenance Reporting:***
 - 27,201 cleanliness or maintenance
 - 13,252 reports of graffiti
 - 5,871 escalator or elevator problems
- ***Law Enforcement or Security Reporting:***
 - 4,219 safety-related submissions using the Transit Watch App
 - 1,410 calls to 911 or Metro's Security Operations Center

- *First Aid:*
 - 182 lives saved using Narcan
 - 51 lives saved using CPR or providing suicide intervention

These interactions have resulted in a positive public perception amongst ridership. Based on survey data conducted and collected by Metro SSLE in July and August of 2023, Metro Ambassadors have made riders feel safer and riders would like to continue to see more Ambassadors on the system:

- 63% of riders agreed that seeing Ambassadors on the system makes them feel safer
- 61% of riders want to see more Ambassadors on the system
- 54% of riders say that Ambassadors make them want to ride the system more often

Finding 34: The use of Metro Ambassadors has improved customer perceptions about safety and security on the system. SSLE has used Ambassadors effectively by deploying them in areas of higher risk for criminal activity and at high-profile events to assist customers.

Recommendation 23: SSLE should continue to evaluate the ability to expand the use of Contract Security, MTS and Ambassadors to enhance overall safety and security presence on the system in a more cost-effective and customer friendly manner.

Recommendation 24: SSLE should establish baselines for the KPIs tracked by Contract Security, MTS and Ambassadors to define their responsibilities and hold those units accountable.

F. Follow-Up on Prior Audit Recommendations

The Metro Transit Security Services Performance Audit for FY21 and FY22 identified various issues and made 14 recommendations to enhance performance efficiency and effectiveness in transit security areas. To follow up on these prior audit recommendations we:

- Reviewed FY21 and FY21 Transit Security Performance audit recommendations.
- Contacted SSLE, LAPD, LASD, and LBPd to verify the status of the corrective actions taken.

The following summarizes the status of the FY21 and FY22 performance audit recommendations by showing each of the original recommendations, the status, and comments regarding progress made.

Table 33: Overall Status of Prior Recommendations for Metro Security Services Performance Audit for FY21 and FY22

Current Status of Recommendations		
Current Status	Number of Recommendations	Recommendation Numbers
Implemented	8	2, 4, 5, 6, 8, 9 10, 11
Partially Implemented	3	3, 7, 13
Not Implemented	3	1, 12, 14

Table 34: Detailed Status of Prior Recommendations for Metro Security Services Performance Audit for FY21 and FY22

No.	Recommendation	Current Status	Comments
1	The Metro SSLE Department should work with contract law enforcement agencies to develop specific targets for the level of visible presence and activity provided by contract law enforcement personnel on the Metro System as part of an overall policing strategy and plan.	Not Implemented	No targets or other types of baselines have been established for boardings, patrol or other metrics related to visibility.
2	The Metro SSLE Department should develop an approach to providing a visible security presence on the Metro	Implemented	In November of 2023, Metro SSLE developed the FY24 Los Angeles Metro Security Annual Plan. The Plan set out clear objectives that Metro and

No.	Recommendation	Current Status	Comments
	Bus System as part of an overall policing strategy and plan.		the law enforcement agencies will pursue to improve safety and visibility. Additionally, Metro and the law enforcement agencies meet twice weekly to discuss policy and deployment issues to address current trends and needs.
3	The Metro SSLE Department should continue to refine its approach to monitoring contracted law enforcement resources to ensure the resources Metro is paying for are actually present and providing services, including the enhanced use of TAP information and potentially using information from GPS enabled body cameras and patrol units.	Partially Implemented	SSLE does not routinely collect all KPI data as required by the law enforcement contracts. Moreover, some of the data that is collected represents estimates based on the presumed schedules of staff and are not based on actual numbers. LASD has developed a Daily Activity Log (DAL) that tracks key boardings and includes GPS functionality, currently Metro does not have the ability independently validate the data being submitted by LASD.
4	LAPD should continue to deploy contracted law enforcement personnel to maximize their visible presence on the System, while providing an effective response to incidents and calls for service using both contracted law enforcement resources and regular neighborhood patrol units.	Implemented	Metro's FY24 Los Angeles Metro Security Annual Plan defines objectives that Metro and the law enforcement agencies will pursue to improve safety and visibility. Additionally, Metro and the law enforcement agencies meet twice weekly to discuss policy and deployment issues to address current trends and needs. These represent significant improvements in deployment and the resulting reductions in criminal activity on the system.
5	The Metro SSLE Department and LASD should work with local law enforcement agencies within the LASD service area to expand their responses to incidents and calls for service on the Metro System to allow LASD to increase their ability for contracted LASD law enforcement personnel to provide more visible presence on the Metro System.	Implemented	Interviews with LASD have indicated that local law enforcement and LASD have existing relationships that allow for local law enforcement to respond to incidents within those jurisdictions. According to LASD, this does not inhibit their ability to provide visibility. Absent separate Metro agreements with those jurisdictions to be present on the system, LASD has indicated that no additional visibility could be

No.	Recommendation	Current Status	Comments
			provided given existing resources. LASD continues to work with local law enforcement, but no formal agreements were determined to be necessary.
6	LBPD should continue to deploy contracted law enforcement personnel to maximize their visible presence on the System, while providing an effective response to incidents and calls for service on the part of the System LBPD is responsible for policing.	Implemented	LBPD continued efforts to maximize their visibility on the system. When calls for service were required, LBPD responded with an officer with the best available response time.
7	Future contracts with the law enforcement agencies should make a provision that <u>the annual documented review</u> of the agency's use of force policy be given to officers assigned to LA Metro patrol. Since these shifts are generally overtime shifts and assignments vary on a day-to-day basis, this recommendation would require each agency to ensure all officers receive this annual training. Metro Security should formally adopt its draft Use of Force Policy including a requirement addressing annual retraining on the policy.	Partially Implemented	None of the subsequent modifications to the LAPD, LASD or the LBPD contain these provisions. However, these recommendations have been implemented in practice.
8	An annual analysis of all uses of force activities, policies and practice should be conducted and posted for public review. The analysis shall identify the date and time of incidents, types of encounters resulting in use of force, trends or patterns related to race, age and gender of subjects involved, trends or patterns resulting in injury to any person including employees, and impact of findings on policies, practices, equipment, and training. A review of	Implemented	Metro SSLE receives regular updates on the use of force by the law enforcement agencies. Additionally, LAPD produces an internal report that identifies use of force incidents by a series of categories. However, there has not been an annual analysis of all uses of force activities, policies and practices that have been posted for public review by SSLE on the entire system.

No.	Recommendation	Current Status	Comments
	incidents of force may reveal patterns or trends that could indicate training needs, equipment upgrades, and/or policy modifications. The process of collecting and reviewing the reports is also critical to this analysis.		
9	Metro Security should consider developing and adopting a formal citizen complaint policy and procedures.	Implemented	Metro has mechanisms for riders and staff to submit complaints, concerns or suggestions. For formal complaints against the law enforcement agencies, law enforcement has document processes for review.
10	SSLE, in coordination with Metro Operations and Customer Care, should develop a comprehensive plan for the coordinated deployment of contracted law enforcement, Metro Security and Transit Ambassador personnel throughout the Metro System. This plan should include clearly defined roles and responsibilities, clear lines and mechanisms for communication, training, and strong supervision and oversight.	Implemented	Metro's FY24 Los Angeles Metro Security Annual Plan defines objectives that Metro and the law enforcement agencies will pursue to improve safety and visibility. Additionally, Metro and the law enforcement agencies meet twice weekly to discuss policy and deployment issues to address current trends and needs. However, without baseline metrics defining "visibility", it is still difficult to define and hold the agencies accountable for a visible presence.
11	Metro contracted law enforcement agencies should continue to use information on crime trends and locations, as well as complaints from Metro employees and patrons, to focus their law enforcement personnel and activities.	Implemented	Metro's FY24 Los Angeles Metro Security Annual Plan defines objectives that Metro and the law enforcement agencies will pursue to improve safety and visibility. Additionally, Metro and the law enforcement agencies meet twice weekly to discuss policy and deployment issues to address current trends and needs. These represent significant improvements in deployment and the resulting reductions in criminal activity on the system.

No.	Recommendation	Current Status	Comments
12	Metro should develop and implement a standardized methodology for conducting counts of homeless people based on the best practices.	Not Implemented	Currently, SSLE is not reporting on the number of homeless riding the system as had been done in prior years. SSLE is working to develop a revised process and methodology to do so, but a new approach has not been implemented as of the time of this audit.
13	Recommendation 1: The Metro SSLE Department should consider further strengthening ongoing monitoring and oversight of compliance with the terms of the law enforcement services contracts by: a) Reinstating and expanding the field review approach to ensure that contracted law enforcement personnel planned and scheduled to work for Metro are present and providing service. b) Including in future law enforcement contracts requirements that law enforcement personnel "TAP" each time they board or de-board trains or buses, and each time they enter or leave a station. c) Expanding the TAP Review approach to ensuring that contracted law enforcement personnel planned and scheduled to work for Metro are present and providing service. This should include reviewing all assignments during one randomly selected day each week rather than just one assignment per contracted law	Partially Implemented	(a) Field reviews have been reinstated. (b) Validation using TAP has been eliminated based on an evaluation that the law enforcement personnel were not adequately using the TAP card system and, therefore, the data was inaccurate. (c) Validation using TAP has been eliminated based on an evaluation that the law enforcement personnel were not adequately using the TAP card system and, therefore, the data was inaccurate. (d) No GPS system exists to track LAPD or LBPD personnel. LASD has developed a Daily Activity Log (DAL) system that allows it to track location and activities performed at that location via GPS. LASD and SSLE are still working on a technology solution to share that information in a way that would allow SSLE the ability to independently validate the activities being reported. (e) SSLE performs these functions. (f) The amendment of the law enforcement contracts at the end of FY23 did not contain any new language related to billing. (g) SSLE has reorganized its compliance function and now

No.	Recommendation	Current Status	Comments
	enforcement agency one day each week. d) Developing and implementing a GPS based review to ensure that contracted law enforcement personnel planned and scheduled to work for Metro are present and providing service using GPS information from body worn cameras and automatic vehicle location systems. e) Including a periodic review of contract law enforcement agency compliance with contract requirements related to personnel qualifications and training in the Compliance Review Standard Operating Procedure. f) Incorporating in future law enforcement contracts procedures for adjusting billed amounts based on results of efforts to verify actual deployment of contracted law enforcement personnel. This should include the results of Field Reviews, TAP Reviews, and reviews conducted using GPS information from body worn cameras and automatic vehicle location systems. g) Reviewing the workload associated with expanded compliance reviews and current staff assigned to reviewing and ensuring compliance with the law enforcement services contract and requesting		each law enforcement agency has a single compliance officer. It is still to be determined if additional staff are required.

No.	Recommendation	Current Status	Comments
	additional compliance staffing as needed.		
14	Metro's SSLE Department should develop an expanded set of performance indicators, including indicators related to fare and Customer Code of Conduct enforcement and critical infrastructure protection, for Metro Transit Security.	Not Implemented	SSLE is providing greater oversight of the transit security options but has determined that the use of performance indicators related to citations for fare enforcement and Code of Conduct violations was counterproductive. SSLE determined that the perception that they would be "quotas" for fare enforcement citations may appear to be providing greater incentives to transit security to issue unnecessary citations. There was a concern that these perceptions would have implications related to Metro's Bias Free policing.

Appendix: FY2023-24 Schedule of Recommendations and Proposed Actions

Metro Security Review Recommendations Summary and SSLE Response					
No.	Recommendation	Staff Assigned	Agree or Disagree	Proposed Action	Completion Date Estimate
1	SSLE should require the law enforcement agencies to report all data required by the Agreements, instructed on the format and frequency of the expected reporting, and develop an agreed upon methodology as to how that data is to be collected and provided.	SSLE & V/CM	Agree	SSLE will work with V/CM to ensure contract requirements are enforced.	Ongoing
2	SSLE should continue to refine its multi-layer deployment approach and establish metrics to allow for a more routine and objective means of evaluating law enforcement's visibility on the system.	SSLE	Agree	SSLE will continue to refine its approach to the multi-layer approach.	Ongoing
3	SSLE should work with the law enforcement agencies to develop baselines for the level of visible presence and activity provided by contract law enforcement personnel on the Metro system as part of an overall policing and accountability strategy. These baselines can and should evolve over time with changes made to deployment strategies but should provide the law enforcement agencies with a	SSLE	Agree	SSLE will work with law enforcement to establish and update targets for contract officers' visibility and activity on the Metro system, promoting accountability and supporting previous recommendations.	Ongoing

	general level of expected activity for each key task.				
4	SSLE should continue to work with the law enforcement agencies to develop tools to be more efficient and develop a cost-effective means to validate presence and activity on the Metro system.	SSLE	Agree	SSLE will continue to collaborate with law enforcement agencies to develop tools that enhance operational efficiency and to establish mutually agreed-upon, cost-effective methods for validating presence and activity within the Metro system.	Ongoing
5	SSLE should work with LASD to identify a potential, cost-effective solution that would provide Metro with access to DAL data in a format that would allow it to independently validate LASD deputy's visibility on the system. SSLE should also evaluate whether the DAL system could be replicated by the other contracted law enforcement agencies.	SSLE	Agree	SSLE will collaborate with LASD to find a cost-effective way for Metro to access DAL data for independent validation of deputy visibility and assess if the system can be used by other contracted agencies.	Ongoing
6	We recommend that LASD collaborate with Metro's SSLE Department to review Fiscal Year 2023 invoices to ensure that all calculations align with the authorized service framework. Also, since Metro's letter dated January 31, 2022, only confirmed approval on the revised deployment model for period from April 3, 2022, through June 30, 2022, LASD should obtain written approval from Metro if LASD continues to use the revised deployment model after June 30, 2022. We also recommend Metro's SSLE Department review the	SSLE/LASD	No response	Recommendation has been revised based on comments received from LASD.	No response

	remaining FY 2023 invoices not tested and calculate the additional credit amount owed by LASD to Metro using our methodology detailed above.				
7	LAPD should inform Metro of the amount expected to exceed the authorized costs approved under Modification No. 6 and 7 before incurring the costs, and Metro's SSLE Department should improve its monitoring of LAPD billings, payments and contract amount to ensure that costs do not exceed the contract amount.	SSLE & V/CM	Agree	SSLE will work with V/CM to ensure contract requirements are enforced.	Ongoing
8	Metro's SSLE Department should enforce the contract requiring LAPD to submit annually the List of Maximum Fully Burdened Hourly Rates and all the required supporting documentation ninety (90) days prior to the start of each fiscal year and any changes to the CAP rates during the fiscal year. Metro should also review the billing rates for all invoices to determine the extent of overbillings for FY 2022, FY 2023, and FY 2024.	SSLE/LAPD	Disagree	There have been two (2) official versions of CAP 41 issued to date. The first version was introduced on February 18, 2021, a "Revised FY21 Rates with CAP 41" is available for review. The second version was signed on April 12, 2023, also available for review as "FY2023 Fully Burdened Rates Memo 041223 CAP 41." In addition to adjusting salary maximums, the latter version also introduced several newly approved positions. For clarity, the initial iteration of CAP 41 is applicable to Fiscal Years 2021 and 2022, while the second version is in effect for Fiscal Year 2023 onward. LAPD submitted CAP to LACMTA on May 27, 2025, to be effective DP12 of FY25.	N/A

9	For any additional labor classifications not identified in the Lists of Maximum Fully Burdened Hourly Rates for full time (straight time) personnel and overtime personnel, LAPD should obtain in writing from Metro the revised lists for approval prior to incurring and billing the cost.	SSLE/LAPD	Disagree	The listed classifications have been approved to work on the contract. Approved in FY23 CAP 41 • 15080 – Management Aide • 91711 – Sr. Management Analyst I • 2214C is the equivalent to 22142, the “C” is an indication the officer is in training, but not a trainee. They are being trained on the requirements to work on the system • 32110 represents a Detention Officer which is reflected on CAP 41 – what document is being reviewed that lists the List of Maximum Fully Burdened Hourly Rates.	Ongoing
10	LAPD should obtain clarification and any supporting documentation from the City’s CAP office to determine whether the additional union benefits billed directly to this contract were included in the calculation of the fringe benefits rates, and whether the fringe benefits rates should be adjusted if additional union benefits were directly billed to Metro. Metro’s SSLE Department should also review the explanation and any supporting documents from the CAP office to ensure that the union benefits were not being billed twice.	SSLE	N/A	Metro will forward the recommendation on to LAPD	N/A
11	LAPD should contact the CAP office to obtain the CAP rates for overtime and submit these	SSLE	N/A	Metro will forward the recommendation on to LAPD	N/A

	documents to Metro together with the List of Maximum Fully Burdened Hourly Rates. Metro's SSLE Department should continue to monitor LAPD's billings to ensure the overtime overhead rates billed were based on the CAP overhead rates in effect at the time the work was performed.				
12	We recommend the SSLE Department further review these billed hour discrepancies to resolve any differences with LAPD. Based on the outcome of the review, SSLE should review the billing for all invoices to determine the extent of the overbilling of hours if determined to be necessary.	SSLE	No response	Recommendation has been revised from comments received from LAPD.	No response
13	We recommend that Metro amend the contract to include the hours billed for monthly animal care.	SSLE	Agree	SSLE will suggest language which allows for the care of canine's is incorporated into the upcoming contract modifications	7/1/25
14	Metro's SSLE Department should document the acceptance of the Bi-Weekly Work Hour Detail Schedules as payroll data.	SSLE	No response	Recommendation has been revised from comments received from LBPD.	No response
15	LBPD should provide Metro with the Cost Allocation Plan to support the benefit rates of 64.014% and 57.883% included in the billing rates. If PTO is already included in the benefit rates, then Metro should disallow the costs billed for PTO	SSLE/LBPD	Disagree	LBPD's Response: Upon review, it appears there may be a misunderstanding regarding the treatment of Paid Time Off (PTO) in LBPD's billing practices. "PTO hours" is a misnomer, LBPD did not bill PTO hours separately or in addition to	

	hours of \$195,116.96 since PTO costs are already recovered through the benefit rates and reflected in the hourly rate billed for each employee.			the allowable costs under Contract Modification No. 2. Rather, accrual hours were incorporated into the calculation of the maximum burdened hourly rate, through a mutually agreed upon billing methodology to collect for the full cost of employees assigned to the contract. On May 7, 2021, LBPD provided a formal memorandum to Metro's Director of Administration and Compliance outlining this revised billing methodology. The memo detailed the use of a PTO Factor to ensure that the billing accurately reflects the actual cost of employee compensation, including employer obligations such as retirement contributions and health benefits, in accordance with the labor Memorandum of Understanding (MOUs). Metro Contract Compliance staff reviewed this methodology through several meetings with LBPD personnel and accepted its use. This methodology has been consistently applied since that time. During the agreement, it became clear that the original fully burdened rate methodology did not capture all benefit costs for employees assigned full time to the contract. Specifically, while paid leave hours (such as vacation or sick time) were not directly billed, fixed employer obligations, such as California Public Employees' Retirement System (PERS) contributions, health insurance, and other benefit accruals continued to be	
--	---	--	--	--	--

				incurred. Due to the structure of the City's payroll and financial system, these ongoing costs are accrued even when no direct billable hours are recorded during leave. To equitably allocate these fixed costs, and properly bill Metro, LBPB incorporated accrued hours in the burdened rate denominator, distributing benefits costs across the standard 2,088 hours annually compensated to full-time staff It is important to clarify that no duplicative or unallowable PTO charges were billed. The amounts billed reflect actual costs incurred, including precise monthly benefit contributions, rather than inflated hours or duplicative charges. Any appearance of duplication may stem from the labeling or format of the supporting documentation, where accruals titled "PTO hours" appear for rate normalization purposes. However, no separate or duplicative billing of PTO occurred. In summary, LBPB confirms that there were no overbilling or duplicate charging of PTO hours. The billing methodology was transparent, mutually reviewed and agreed upon by Metro, and designed to allocate legitimate, ongoing personnel costs fairly. LBPB respectfully request that this finding be reconsidered based on the documented agreement, consistent application of the approved methodology, and the absence of any actual unallowable or duplicative billing.	
--	--	--	--	--	--

16	We recommend that LBPD reconcile the hours and amounts claimed on the Work Hour Detail Schedules to the Daily Metro Cost Reports and correct any discrepancies between these two documents to ensure the accuracy of the billed amount.	LBPD	No response	Recommendation has been revised from comments received from LBPD.	No response
17	LBPD should provide Metro with adequate documentation to support ODC billings included above. Supporting documentation should include third party invoices, CPA audit reports, or the City of Long Beach Cost Allocation Plan. Metro's SSLE Department should also ensure LBPD's ODC billings are adequately supported before approving the invoices for payment.	SSLE/LBPD	Disagree	LBPD Response: LBPD respectfully submits the following clarifications and supporting context regarding the support for Other Direct Costs (ODC) billed under the contract. At the outset of the agreement, LBPD engaged directly with Metro staff to confirm expectation regarding the format and content of backup documentation. In September 2020, Metro staff reviewed a draft of LBPD's documentation and responded affirmatively that the format met their requirements. This communication is attached for reference. While minor comments were provided on specific costs, Metro did not indicate that the overall documentation was inadequate or incomplete. Since that initial confirmation, LBPD has consistently used the same documentation format across all billing cycles, and no concerns were brought to our attention regarding its sufficiency until this audit. For Body Worn Camera (BWC) support, licensing, archiving, and redaction costs, LBPD maintains vendor invoices on file that directly substantiate the amounts billed to Metro.	

				These invoices were maintained as part of our standard internal documentation procedures and were available to support the costs submitted to Metro. With regard to Fleet Services and Technology Costs, these services are provided by other City of Long Beach departments through established interdepartmental cost recovery processes. In accordance with our internal cost recovery procedures, we included detailed summary tables in each billing packet to reflect these costs associated with these internal services. These summaries were designed to provide clear and transparent support for the charges billed. Given this history of documented acceptance, the availability of supporting records, and our consistent application of approved practices, LBPB respectfully request that this finding be reconsidered.	
18	Due to the success of the surge in reducing criminal activity on the system, Metro should consider conducting periodic surge activities. These enhanced deployments can have a significant and prolonged impact on crime, as well as the public's perception of safety, even after the surge has concluded.	SSLE	Agree	Given the success of the surge in reducing criminal activity, it would be prudent for Metro to consider implementing periodic surge activities. These targeted deployments not only help maintain lower crime rates but also contribute to sustained improvements in public perception of safety, reinforcing confidence in the system even after the surge concludes.	Ongoing
19	Metro should consider developing and collecting data on the effectiveness of the agencies' community-based policing efforts. Such metrics	SSLE	Agree	SSLE will work with Customer Experience (CX) to add questions to CX surveys, if those don't already exist, related to community-based policing efforts and	Ongoing

	could include survey data from customers and Metro staff, and the number of community events each agency participates in related to transit services.			community event participation. Also, SSLE will work on tracking related survey data as specified in the Metro Bias Free Policing Policy and Public Safety Analytics Policy. Effective April 1, 2025 LBPB is no longer contracted with Metro for public safety services.	
20	SSLE should annually conduct a sample of it choosing to review of use of force reports prepared by the law enforcement agencies to review whether the agencies' practice comply with the principles of "Eight Can't Wait."	SSLE	Agree	conducting an annual SSLE review of use of force reports will help ensure law enforcement practices align with the "Eight Can't Wait Principles", reinforcing transparency, accountability, and a commitment to safe, responsible policing.	Ongoing
21	SSLE should collect data on each of the KPIs listed in the law enforcement contracts. Where possible, this data should be based on actual numbers, not estimates associated with scheduled personnel assignments.	SSLE	Agree	SSLE will review the law enforcement contracts and meet with the law enforcement agencies to confirm that data for each KPI is being provided, using actual numbers wherever possible.	Ongoing
22	SSLE should develop annual baselines for the KPIs set forth in the law enforcement contracts. This should include baselines for key visibility KPIs including rail and bus rides, vehicle patrols and foot patrols. These goals can and should be adjustable based on changes in deployments or changes in strategic focus. This recommendation is consistent with recommendations made in prior reports.	SSLE	Agree	SSLE will develop annual targets for KPI's that are achievable because they are derived from/are proportional to developmental levels (rail rides, vehicle patrols, and foot patrols). This aligns well with recommendations from previous reports and supports continuous improvement.	Ongoing

23	SSLE should continue to evaluate the ability to expand the use of Contract Security, MTS and Ambassadors to enhance overall safety and security presence on the system in a more cost-effective and customer friendly manner.	SSLE	Agree	SSLE will continue to assess the feasibility of expanding the roles of Contract Security, and MTS personnel, to enhance the overall safety and security presence on the system in a more cost effective and customer-centric manner. Metro's Ambassadors do not report to SSLE.	Ongoing
24	SSLE should establish baselines for the KPIs tracked by Contract Security, MTS and Ambassadors to define their responsibilities and hold those units accountable	SSLE	Agree	Establish clear targets for KPIs tracked by Contract Security, and MTS would be essential for defining responsibilities and ensuring accountability. Setting measurable goals will enhance performance management and support more effective oversight across all units involved. Metro's Ambassadors do not report to SSLE.	Ongoing