Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

April 3, 2020
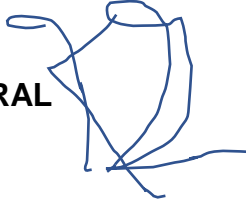
TO: BOARD OF DIRECTORS

THROUGH: KAREN GORMAN
              INSPECTOR GENERAL

FROM: JOHN METCALF
              SENIOR AUDITOR, OFFICE OF THE INSPECTOR
              GENERAL

SUBJECT: FY19 TRANSIT SECURITY SERVICES PERFORMANCE

ISSUE

On February 23, 2017, the Metro Board passed a motion directing that the Inspector General conduct an annual audit of each law enforcement services contract to determine how key performance indicators are measuring up against actual performance metrics. The audit is to ensure that Metro is receiving the services it is paying for. BCA Watson Rice WR, LLP, was hired to audit the Fiscal Year 2019 transit security services performance, and completed the attached report.

BACKGROUND

In 2017, LACMTA (Metro) awarded three separate 5-year firm 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) for transit law enforcement services to support day-to-day operations across Metro's entire service area. Metro also directly employs transit security officers who perform fare checks and bus/rail patrolling.

DISCUSSION

The report discusses trends and findings in six areas:

- Trends in Crime, Perceptions of Safety, and Safety and Security Complaints
- Resource Monitoring and Oversight

- Key Performance Indicators (KPI)
- Community Policing
- Compliance with Specific Contract Requirements
- Fare and Code of Conduct Compliance Enforcement

The audit identified 22 recommendations for improving transit security performance, which are summarized in the Appendix to the report. The recommendations will enhance performance efficiency and effectiveness in the following transit security areas:

- Metro System Security & Law Enforcement (SSLE) oversight of the 3 departments
- Crimes reporting accuracy and completeness
- Response times for all categories of dispatched incident calls for service
- Oversight and monitoring of law enforcement resources
- Key performance indicators (KPI) for law enforcement services, including base line target levels of performance for each KPI, and development KPIs for Metro Transit Security
- Development a Metro Community Policing Plan
- Monitoring each law enforcement services contract to ensure compliance with contract requirements in areas such as:
  - Meeting required personnel certifications and completing required training
  - Monitoring billings and submission of payroll records and other required supporting documentation
  - Providing maximum hourly rates for each labor classification
  - Submitting required reports in a timely manner
  - Reviewing billings to assure that only actual hours worked are billed
  - Providing the equipment in the quantities required by the contract
  - Returning to Metro overbilled and overpaid amounts (LAPD, $789.88, and LBPD, $29,313.65)

It should be noted that this audit covers Metro's FY 2019 and during this period of time, key personnel in charge of Metro' System Security & Law Enforcement business unit have since left the organization and have been replaced with new management. Metro's current management have already addressed some matters, such as the hiring of a full time compliance director to monitor the contracts and they have commissioned the development of a system to track activity using GPS.

Adoption of the recommendations in this report does not increase the financial impact on the agency. However, by acting on the recommendations, some funds already expended may be recovered by Metro, and some funds may be saved in the future by improved monitoring.

NEXT STEPS

Metro management should:
- Complete the Schedule for Tracking Metro's Proposed Actions in response to the recommendations provided in Appendix B of the report as determinations are made on implementing the recommendations; and
- Periodically report to the Metro Board on the status of actions taken to implement the recommendations.

Attachment:
    2020-03-27 20-AUD-07 Final Report FY 2018-19 Metro Transit Security Performance

Los Angeles County
Metropolitan Transportation Authority
Office of the Inspector General

Fiscal Year 2019
Metro Transit Security
Services Performance

M **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
213.244.7318 Fax

Metro

March 27, 2020

Metro Board Members

Re: Report on Fiscal Year 2019 Metro Transit Security Services Performance

The Office of the Inspector General (OIG) conducted a security-focused review to determine the level of performance for transit security function services (law enforcement and Metro's Transit Security Officers) during FY 2019. 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). Metro also directly employs transit security officers and began using Metro security officers for fare checks and bus/rail patrolling.

The Metro Board directed the OIG to perform an annual audit of each law enforcement services contract to determine how key performance indicators are measuring up against metrics and ensure that Metro is receiving the services it is paying for. To accomplish this directive, the OIG prepared a scope of work for the Request for Proposal. BCA Watson Rice WR, LLP, was hired to perform the security performance review for fiscal year 2019, and completed the attached report.

The audit identified 22 recommendations for improving transit security performance, which are summarized in the Appendix to the report. The recommendations will enhance performance efficiency and effectiveness in the following transit security areas:

- Metro System Security & Law Enforcement (SSLE) oversight of the 3 departments
- Crimes reporting accuracy and completeness
- Response times for all categories of dispatched incident calls for service
- Oversight and monitoring of law enforcement resources
- Key performance indicators (KPI) for law enforcement services, including base line target levels of performance for each KPI, and development KPIs for Metro Transit Security
- Development a Metro Community Policing Plan
- Monitoring each law enforcement services contract to ensure compliance with contract requirements in areas such as:
    - Meeting required personnel certifications and completing required training
    - Monitoring billings and submission of payroll records and other required supporting documentation
    - Providing maximum hourly rates for each labor classification

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- o Submitting required reports in a timely manner
- o Reviewing billings to assure that only actual hours worked are billed
- o Providing the equipment in the quantities required by the contract
- o Returning to Metro overbilled and overpaid amounts (LAPD, $789.88, and LBPD, $29,313.65)

It should be noted that this review covers Metro's FY 2019 and during this period of time, key personnel in charge of Metro' System Security and Law Enforcement business unit have since left the organization and have been replaced with new management. Metro's current management have already addressed some matters, such as the hiring of a full time compliance director to monitor the contracts and they have commissioned the development of a system to track activity using GPS. Preliminary comments are attached from the Chief System Security & Law Enforcement Officer.

We appreciate the assistance provided by Metro staff during this review. I am available to answer any questions the Board Directors may have regarding this report.

Sincerely,

Karen Gorman
Inspector General

Metropolitan Transportation Authority

Metro Interoffice Memo

Date	April 1, 2020
To	Karen Gorman, Inspector General
Through	Robert Green, Chief System Security & Law Enforcement Officer
From	Nancy Felix, Interim Director, Systems Security Administration & Compliance
Subject	OIG Audit Report No. 19-AUD-10 (FY18) System Security & Law Enforcement Corrective Actions

System Security and Law Enforcement (SS&LE) staff has reviewed the OIG Open Recommendations dated June 24, 2019 (Report No. 19-AUD-10) and takes corrective actions to each of the nineteen (19) recommendations as presented below, specifically:

REC NO. 3: REPORTED CRIME

SS&LE ACTION:

Each Transit Law Enforcement agency reports crime by three different categories, Crimes Against Persons, Crimes Against Property, and Crime Against Society. These categories are in accordance with the Uniform Crime Reporting (UCR) program. The SS&LE staff collects the crime data reported daily and provides a monthly summary update to members of the Metro Board.

REC NO. 4: RESPONSE TIME

SS&LE ACTION:

Each Transit Law Enforcement agency reports response time information comprised of three categories (Emergency, Priority & Routine). The SS&LE staff will continue to collect the response time information and include the Priority and Routine response time averages in the monthly report presented to members of the Metro Board.

REC NO. 5: GPS FUNCTION

SS&LE ACTION:

In October 2019, Los Angeles Metro executed Modification No. 8 with Axiom Xcell, Inc.

(Contractor) under Contract No. PS30203139 (TAP Mobile Phone Validator Application), to extend the period of performance and proceed with implementing new enhanced features to improve functionalities and capabilities for the Mobile Phone Validator (MPV). SS&LE staff will be able to track or monitor the number of foot and vehicle patrols of bus stops, transit centers, train platforms, plazas, stations, and number of bus and train boarding activities of contracted law enforcement resources by the officer's location, shift start date and time, shift end date and time.

In March 2020, Metro staff completed the re-programing and issuance of the MPVs to the law enforcement partners. Metro staff continues to meet weekly with Axiom to discuss issues related to the current map dashboard and review progress of the enhanced map features listed under Modification No. 8 executed in October 2019. On March 17, 2020, Axiom presented a test demo of the enhanced map features but did not work. Metro SS&LE tried using the test demo on March 24, 2020 and March 30, 2020, but both times Metro SS&LE encountered issues such as network access, map features missing, and reports not displaying data. The test demo of the enhanced map features has been unsuccessful, the current map dashboard continues to be unreliable, slow and labor intensive to draw information for accountability. SS&LE staff will continue to work with the vendor to ensure contract compliance, and determine if the upgrade will meet the compliance, and accountability requirements needed.

Based on the modification's list of milestones, the enhancement features related to the Map are anticipated to be completed by July 24th and July 31st, 2020. We will update the Board on progress or setbacks.

SS&LE staff will leverage security technologies to assist in processing the meta data available from all law enforcement contracting agencies to include the developing dashboard and use of other technologies such as access to body cameras and access control devices, which can all collectively through a PSIM solution identify where law enforcement is on the system on a daily basis.

REC NO. 6: KEY PERFORMANCE INDICATORS (KPI)

SS&LE ACTION:

The SS&LE Executive team will evaluate the six key performance indicators (crimes reported in accordance with Uniform Crime Reporting guidelines, average emergency response times, percentage of time spent on the system, ration of staffing levels vs vacant assignments, ratio of proactive vs dispatched activity, and number of grade crossing operations) and work with each respective law enforcement agency to analyze current KPIs in efforts to revise or adopt meaningful and reasonable KPIs, if necessary.

REC NO. 9a: LAPD PAYROLL RECORDS

SS&LE ACTION:

The total amounts billed by the LAPD for actual services provided are amounts calculated based on actual payroll transaction records (exported from LAPD's payroll system), and of LAPD's Transit Services Bureau (TSB) certified activity logs (E214s). SS&LE staff performs an audit of each monthly billing received by examining all available data on a large scale over the course of the entire invoice period, and takes a sample audit of 50% of the billing period to examine the invoice billing summary; payroll figures to confirm compliance with the maximum fully burden hourly rates; TSB Overhead, Overtime, and Administrative summaries to confirm staffing and deployment levels; and daily morning and activity reports (Form ICS214).

REC NO. 10a, 10b, 11a & 13a: LAPD MAXIMUM FULLY BURDEN RATE & COST ALLOCATION PLAN (CAP) RATE

SS&LE ACTION:

The LAPD submitted a letter dated June 13, 2019 with enclosed lists of revised personnel maximum fully burdened hourly rates for FY 2017-2018 (FY2018) and 2018-2019 (FY2019). The revised lists encompassed labor classifications for all full-time sworn and civilian positions assigned to the contract and positions that perform contract-related activities on an overtime basis. The letters also identified added, revised and replaced labor classification codes, and updated rates. The LAPD submitted a letter dated June 14, 2019 with similar lists related to the federally approved Cost Allocation Plan (CAP) 39 for FY 2019-2020 (FY2020). On January 31, 2020, SS&LE requested and received LAPD's prevailing Cost Allocation Plan (CAP) 39, after a brief review SS&LE staff sent an email requesting to discuss further, requesting clarification of the "Central Services" rate included on all full-time personnel assigned to the TSB, when Metro provides office space, telephone services, etc. at the Metro site. SS&LE staff is still awaiting a response from LAPD.

SS&LE staff continues to monitor and review the LAPD billing rates for all invoices to ensure LAPD's billings are within the allowable maximum fully burdened hourly rates per Memorandum of Understanding with the respective labor unions and federal government approved cost allocation plans. The allowable maximum fully burdened hourly rates are per Memorandum of Understanding with the respective labor unions and federal government approved cost allocation plans, SS&LE staff will ask Metro's Contract Administrator to review LAPD's maximum escalation rate methodology and propose to issue an administrative modification to align Exhibit B - Memorandum of Costs with how LAPD submits the maximum escalation rates for approval by Metro and invoicing practice.

REC NO. 12a, 17a & 22a: OVERBILLED, OVERPAID AND CREDIT AMOUNTS

SS&LE ACTION:

SS&LE staff will review overbilled, overpayment and credit amounts with respect to each agency (LAPD $3,874.99; LBPD $14,643.89 & LASD $1,699.68) and reconciled any discrepancies in coordination with each agency.

REC NO. 14a: LAPD MONTHLY SUMMARY OF PROBLEM-ORIENTED POLICING PROJECTS

SS&LE ACTION:

SS&LE staff determined that monthly summary submittals of Problem-Oriented Policing projects were not required. Further, this element is sufficiently met by routine problem solving planning meetings such as the weekly executive law enforcement meeting.

REC NO. 15a: LAPD EXHIBIT E – CONTRACTOR PROVIDED PROPERTY

SS&LE ACTION:

SS&LE staff continues to work with the LAPD to ensure Metro receives a comprehensive inventory list of any equipment the LAPD may have billed Metro both start-up and recurring costs for the Contractor Provided equipment (Exhibit E) as set forth in its cost proposal, Exhibit C. To date the LAPD has provided SS&LE staff with a list of all vehicles purchased on behalf of Metro. The SS&LE staff is in the process of adding the vehicles to Metro's Asset list. On January 2020, the LAPD collaborated with SS&LE staff and completed a comprehensive inventory of all Metro purchased and provided computers, monitors and printers to the LAPD's TSB. SS&LE staff continues to evaluate equipment invoices to ensure the LAPD returns all Metro-funded equipment.

REC NO. 18a: LASD REPORT FOR NUMBER OF CASES REFERRED FOR FOLLOW-UP INVESTIGATION

SS&LE ACTION:

SS&LE staff will work with LASD to ensure they submit a report for the number of cases referred for follow-up investigation and the subsequent dispositions.

REC NO. 18b: LASD REQUIRED REPORTS

SS&LE ACTION:

LASD submits monthly KPI crime stats reports and Daily Reports in a timely manner. The reports received have adequate information and in a format that allows Metro to determine the

calculations of the reported figures. Metro will continue to save the email that contains the reports so that a time stamp is recorded and monitor the reports as they are received.

REC NO. 20a: LBPD AMOUNT EXPECTED TO EXCEED

SS&LE ACTION:

On October 2018, the LBPD provided SS&LE staff with an expected cost expansion impacting years 2 to 5 of the contract budget. During a meeting with LBPD on March 18, 2020, LBPD committed to provide Metro with an estimate of costs LBPD expects to incur for the remainder of year 3 through year 5 of the contract budget by March 31, 2020.

REC NO. 21a: LBPD DAILY SUMMARY OF ASSIGNMENTS

SS&LE ACTION:

The monthly invoices submitted by the LBPD to Metro requesting reimbursement for services rendered include certified timecards and overtime reports. The LBPD also provides daily activity reports.

REC NO. 23: LBPD BILLING METHODOLOGY

SS&LE ACTION:

Metro's Contract Administrator reviewed LBPD billing methodology and proposed to issue an administrative modification to align Attachment B - Memorandum of Cost of the Contract with how LBPD submits maximum fully burdened rates for approval by Metro and invoicing practice. A draft of the administrative modification was shared with LBPD on March 13, 2020 by Metro's assigned Contract Administrator.

SS&LE staff appreciates the courtesy and cooperation extended to us during the review. SS&LE staff has been, and remains, fully committed to ensure that Metro is receiving the transit law enforcement services it is paying for.

Distribution:
Shalonda Baldwin
Aston Greene
Ron Dickerson

M Metro Interoffice Memo

Date	April 3, 2020
To	Karen Gorman Inspector General
From	Bob Green $\mathcal{BG}$ Chief System Security and Law Enforcement Officer
Subject	Updated Timeline - Draft FY19 Metro Security Performance Review

This correspondence is to update the memo issued on March 23, 2020, acknowledging the draft report of the FY19 Metro Security Performance Review. System Security and Law Enforcement (SSLE) staff has reviewed the draft report and determined additional documents will need to be reviewed to provide accurate and detailed responses to the report's recommendations. As a result, staff will need to extend the initial thirty-day period by an additional fourteen days, a completion date of Thursday, May 7, 2020.

We will schedule a meeting with you once we have drafted our responses. Thank you for your partnership and patience.

Metro Office of the Inspector General

Metro Transit Security
Performance Audit
Fiscal Year 2019

March 2020

FINAL REPORT

Audit Report No. 20-AUD-07

Submitted by

BCA Watson Rice, LLP

TABLE OF CONTENTS

1. Executive Summary

Background and Objectives

In 2017, Metro awarded three separate 5-year firm-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) ("Contractors") for transit law enforcement services to support day-to-day operations across Metro's entire bus and train service area.

On February 23, 2017, the Metro Board passed a motion directing that the Office of the Inspector General (OIG) be tasked with annually auditing each law enforcement services contract to determine how key performance indicators are measuring up against actual performance metrics. The audit is to ensure that Metro is receiving the services it is paying for. The scope of this audit is focused on the following six areas.

A. Resource Monitoring and Oversight

Metro has and will continue to have a substantial investment in resources devoted to system safety and security. Over the five-year contract period (FY2018 to FY2022) Metro has committed over $646 million to pay for contracted law enforcement services. Ensuring that these resources are effectively and efficiently used is important.

Contract Compliance Monitoring and Oversight

Metro's System Security and Law Enforcement (SSLE) Department is charged with ongoing oversight of the contracted law enforcement services as well as the operations of Metro Security. Historically, oversight and monitoring of contracted law enforcement resources has been problematic. Prior audit reports have identified the lack of monitoring and oversight as significant issues and concerns, and numerous recommendations have been made to significantly strengthen monitoring and oversight.

Based on this year's (FY 2019) performance review, we continued to find that compliance monitoring and oversight of the law enforcement contracts by Metro's SSLE Department remains inadequate. In our detailed review of invoices submitted and paid for two months, we found some instances where contract billings and payments were not in compliance with the contract terms, resulting in overbillings and overpayments. We also found some instances of non-compliance with requirements related to the qualifications and training of personnel assigned, reports and information being provided to Metro, equipment provided under the contract, and providing appropriate support for invoices submitted.

We recommend the Metro SSLE Department significantly strengthen ongoing monitoring and oversight of compliance, review billings and payments for all twelve months of FY 2019, and formally amend the terms of the contracts, if needed.

More information on contract compliance monitoring and oversight can be found beginning on page 14 of this report.

Ensuring Contracted Law Enforcement Personnel Presence

Metro has had some difficulty in ensuring that law enforcement personnel assigned to Metro are actually present and performing as assigned. There has not been an effective means of verifying that personnel charging time on the Metro contract are actually present and providing the contracted services.

Establishing an effective mechanism for ensuring the presence of contracted law enforcement personnel was a key element of the new law enforcement service model implemented with the current contracts. In 2015, the Transit Policing Working Group (TPWG), chaired by a Metro Director (and current Chair), developed the current policing model for Metro. A key priority adopted by the TPWG was to "improve the level of accountability for law enforcement and security services through improved operational data availability and quality."

The key strategy for accomplishing this priority was through the use of the smartphones issued to law enforcement personnel to use as a validator for TAP fare cards via a Mobile Phone Validator (MPV) application developed for the smartphone. These smartphones, as do all smartphones, have "location services" or GPS capabilities that can be used to track and monitor the location of each smartphone user. Using this capability would provide a reliable and verifiable mechanism for Metro to ensure that contracted law enforcement resources are being used effectively and as planned.

Metro's SSLE Department has made little progress in implementing a reporting mechanism for verifying and documenting contracted law enforcement actual presence using smartphone location based services / GPS capabilities. These services are required for cellular service providers to identify the location of each smartphone and route calls and data to and from the nearest cell tower.

Smartphone locations are identified and tracked every few seconds even when the phones are not being used. This location information is stored by numerous entities, including the cellphone service provider, Google, and other companies that use this information for marketing and market research. Real time and historic location based information is used by many smartphone apps. Some of these currently available apps and related services could be adapted to provide effective monitoring and oversight of Metro contracted law enforcement resources, including time and attendance monitoring.

We recommend the Metro SSLE Department develop an effective approach to monitoring and overseeing contracted law enforcement resources to ensure the resources Metro is paying for are actually present and providing services. This should be accomplished by using the smartphones issued to contract law enforcement personnel and a software application (app) that uses these smartphones' location based services capabilities.

More information on ensuring contracted law enforcement personnel presence can be found beginning on page 15 of this report.

B. Trends in Crime, Perceptions of Safety, and Safety and Security Complaints

There are three key outcome measures that can be used to evaluate the effectiveness and trends of Metro's safety and security approach and program. These are the level of reported crime on the system, the perceptions of safety by users of the system, and the number of safety and security complaints made by users of the system.

Reported Crime

Total reported violent crime on the Metro System increased by 2% between FY 2018 and FY 2019, although reported violent crime decreased 17% between FY 2015 and FY 2019. Some of this change may be due to a 15% decline in ridership over the five-year period. Total reported violent crime per million riders increased 6% between FY 2018 and FY 2019 and declined 2% over the entire five-year period.

Obtaining complete and accurate reporting of crime that occured on the Metro System continues to be challenging. This is partially due to the fact that the Metro System operates within multiple jurisdictions with their own law enforcement agencies who respond to, handle, and report crime that may not be reported to Metro.

We recommend the Metro SSLE Department continue to work with contract law enforcement agencies to improve the complete and accurate reporting of crime that occurs on the Metro System.

Rider Perceptions of Safety

Perception of crime and disorder on the Metro System creates a risk to the confidence in safety held by passengers and Metro employees and poses a risk to the reputation of Metro as a safe and secure system. Passengers who perceive the system to be unsafe will not use the service, and therefore reduce the number of people using transit and Metro's ridership.

Based on Metro rider surveys conducted annually, rider perceptions of safety on the Metro Train system declined slightly and rider perceptions of safety on the Metro Bus system improved slightly between FY 2015 and FY 2019. These changes in perceptions of safety are small and within the margin of error for the survey. However, it is important to continue to monitor rider perceptions of safety on the Metro System and to develop strategies to address concerns and improve that perception.

Complaints Regarding Safety and Security

Another important indicator of the public or riders' perception of the safety of the Metro System is the number of complaints received regarding safety and security. During the period from FYs 2015 to 2019, rider complaints for the bus system regarding passenger safety or conduct issues were not among the top ten complaints. However, for the rail system, rider complaints regarding passenger safety or conduct issues were the second most common complaint of the top ten complaints for FYs 2015 to 2017. For FYs 2018 and 2019, complaints regarding passenger safety or conduct issues dropped to five of the top ten.

We recommend the SSLE Department continue to monitor rider survey results regarding perceptions of safety of riders on the Metro System and complaints regarding safety and

passenger conduct issues and develop strategies to improve those perceptions and reduce complaints.

More information on trends in crime, perceptions of safety, and safety and security complaints can be found beginning on page 19 of this report.

C. Key Performance Indicators (KPIs)

It is essential that Metro clearly define performance expectations for each of the contract law enforcement agencies and use meaningful performance indicators to evaluate how well these expectations are being met. The KPIs in the contracts for each of the three contracted law enforcement agencies are listed in Exhibit 6 on page 26 of this report.

Reporting of Crime and Incident Response Time Indicators

Two of the KPIs included in each of the law enforcement contracts were intended to provide information on the outcomes of the law enforcement service provided including changes in the number of crimes reported and increases in crime incident response times.

In crime reporting, the emphasis should be on violent crime, which is obviously the most impactful to the Metro System and has the greatest impact on Metro's riders. Metro's reporting of all crime in the aggregate is less meaningful because violent crimes such as homicide, robbery and rape are given the same weight as lesser crimes such as larceny, petty theft, and vandalism. We recommend the Metro SSLE Department provide more detailed information on reported crime to distinguish between violent crime and property and petty crime.

A primary workload for law enforcement is responding to and handling incidents that occur on the Metro System or calls for service. Metro's SSLE Department currently only collects and reports response time information for emergency calls for service. While emergency calls for service are obviously the most important calls, tracking and reporting response time on less urgent incidents and calls for service is also important.

Often these lower priority calls for service involve quality of life issues and concerns as well as victims of property crimes. A slow response to these incidents can have a negative impact on the perception of the riding public that the transit system is safe and well protected. In addition, not requiring contract law enforcement agencies to track and report these response times communicates to them and their officers that these calls are not important. We recommend that Metro's SSLE Department begin to collect and report on response times for all calls for service that require a law enforcement response.

Visibility of Law Enforcement Security Personnel Indicators

Providing a visible security presence within the Metro System is an important strategy for providing both a sense and reality of safety. Three of the KPIs included in each of the law enforcement contracts were intended to provide information on the visibility of law enforcement security personnel on the Metro System. These are 1) the ratio of proactive versus dispatched activity, 2) the number of foot and vehicle patrols of bus stops, transit

centers, train platforms, plazas, and stations, and 3) the number of bus and train boardings by contracted law enforcement personnel.

Contract law enforcement agencies were only able to report on the ratio of proactive versus dispatched activity. Contract law enforcement agencies were not able to report on the other two KPIs.   While these are important indicators and would provide useful information on the level of activity and visibility of contracted law enforcement personnel, it was not practical for the law enforcement agencies to reliably collect meaningful information for these indicators.

As discussed in Section A of this report, using the Metro issued smartphones' location based services capability and the data generated could provide more reliable and meaningful information on the amount of time contracted law enforcement officers spend on each of these activities related to KPI 2 and 3 above.

Law Enforcement Personnel Presence Indicator

One of the KPI included in each of the law enforcement contracts was intended to provide information on the presence of the contracted law enforcement personnel. This is the ratio of staffing levels and vacant assignments. This indicator is important in both communicating to the contract law enforcement agencies the need to actually staff contracted assignments and to report how effectively these positions are actually being staffed. Reported staffing levels collectively were at 98.5% or above during FY 2019.

Baseline Expectations and Other Potential Performance Indicators

It is important to establish baseline expectations or targets for each performance indicator. This not only clearly communicates performance expectations, but it also can help drive improvements in performance through the development and implementation of new strategies.   Discussions on reviewing and revising the KPIs to provide more meaningful performance information have not been initiated, and baseline performance levels for each KPI have not been developed.

We recommend Metro's SSLE Department work with contract law enforcement agencies to review, revise, and adopt KPI's, including baseline or target levels of performance for each KPI.

More information on KPIs can be found beginning on page 26 of this report.

D. Community Policing

Community policing within a transit system should place an emphasis on quality of life issues. The customers of the Metro System must feel safe and secure. The presence of security, in whatever form, must have a "felt presence;" that is, they must be visible and engaged without becoming oppressive and threatening.

Metro Community Policing Plan

The Metro SSLE Department has made little progress in developing a community policing plan for the Metro System.   During the FY 2018 Performance Audit the Metro SSLE

Department stated they were in the process of developing a unified community policing plan instead of having each of the three law enforcement agencies develop individual community policing plans.

The SSLE Department expected to have a draft Metro Community Policing Plan completed by the Fall of 2019. The SSLE Department was not able to provide any information or documentation showing progress toward the development of this plan.

We recommend the Metro SSLE Department develop the Metro Community Policing plan and ensure it includes specific training in Problem Oriented Policing for law enforcement personnel, attendance by law enforcement personnel at community meetings, and protocols to obtain feedback from bus and rail managers.

More information on Community Policing can be found beginning on page 39 of this report.

E. Compliance with Specific Contract Requirements

The contracts with the three law enforcement agencies each contain specific requirements related to personnel and training, billing, required reports, and other contractual requirements.

Overview of Law Enforcement Contract Requirements

Each of the contracts with the three law enforcement agencies includes specific contract requirements. This includes requirements for the experience and training of law enforcement personnel assigned to Metro, billing information and supporting documentation, required information and reports on activities, and other information on equipment provided.

Los Angeles Police Department (LAPD) Contract Compliance

The following are the results of our review of LAPD's contract compliance:

- LAPD was in compliance with the contract requirements related to personnel and training with two exceptions.

- The total amount billed and paid to LAPD for FY 2019 exceeded the estimated cost specified in the contract for Year 2.

- Based on our testing of two sampled invoices, 19 of LAPD's labor classifications were not found in the Metro approved lists of maximum fully burdened hourly rates. The amount billed for these labor classifications totaled $6,797,562.42.

- Based on our testing of two sampled invoices, a total of $1.1 million was identified as billed to Metro and paid to LAPD for compensated time off and union benefit payments rather than for actual hours worked.

- Based on our testing of two sampled invoices, a total of $789.88 was identified as overbilled and overpaid to LAPD for labor classifications with billed rates different

from approved rates.

- LAPD met 6 out of 9 contract requirements for submitting required reports to Metro.

- Exhibit E of the contract provides a list of equipment that the LAPD was supposed to provide under the contract. We found that LAPD did not provide the equipment in the quantities listed in Exhibit E.

More information on LAPD's contract compliance can be found beginning on page 51 of this report.

Los Angeles County Sheriff's Department (LASD) Contract Compliance

- LASD was in compliance with the contract requirements related to personnel and training.

- The total amount billed and paid for FY 2019 exceeded the estimated contract amount for Year 2.

- Billing rates were in compliance with Metro's approved rates. Invoices were based on actual services provided and supported by the Service Level and Billing Status Reports.

- LASD met 7 out of 8 contract requirements for required reports.

More information on LASD's contract compliance can be found beginning on page 63 of this report.

Long Beach Police Department (LBPD) Contract Compliance

- LBPD was in compliance with the contract requirement for Transit Policing training.

- The total amount billed and paid for FY 2019 exceeded the estimated cost specified in the contract for Year 2.

- Invoices were supported by bi-weekly Work Hour Detail Schedules. Daily summary of assignments for all hours worked and payroll records were not submitted with the invoices.

- We identified a total amount of $29,313.65 as overbilled and overpaid to LBPD for the two invoices reviewed due to differences in the approved billing rates versus the rates used to bill Metro.

- The billing methodology for equipment cost was not consistent with the contract agreement terms and conditions.

- LBPD met 6 out of 9 contract requirements for required reports.

More information on LBPD's contract compliance can be found beginning on page 67 of this report.

F. Fare and Code of Conduct Compliance Enforcement

Enforcing fare compliance on the Metro System as well as the Metro Customer Code of Conduct is a key element of Metro's safety and security mission.

Code of Conduct and Parking Enforcement and Citations

The vast majority (99%) of the citations for Metro fare, Code of Conduct and parking violations are issued by Metro Security Officers, who are direct employees of Metro. This demonstrates the substantial change in the transfer in responsibility for fare and code of conduct enforcement from contracted law enforcement to Metro Security. The number of Code of Conduct citations (including fare violations) issued decreased substantially (67%) between FY 2018 and FY 2019. Total citations are 78% below the level for FY 2013.

Performance Indicators for Metro Security

The role and responsibilities of Metro Security have expanded substantially over the past few years and now includes primary responsibility for enforcing Metro's Code of Conduct on the system, including fare enforcement. Given this, it is important that Metro Security have an effective accountability system, including meaningful performance indicators.

The SSLE Department has made no progress in developing effective performance indicators and verification methods for Metro Security. During the FY 2018 Performance Audit the SSLE Department reported they would be developing Key Performance Indicators (KPI) for Metro Security during 2019. These KPIs were to cover two key areas: Fare Enforcement and Critical Infrastructure Protection. We recommend Metro's SSLE Department complete efforts to develop key performance indicators for Metro Security.

More information on fare and code of conduct compliance can be found beginning on page 76 of this report.

2. Background

The Los Angeles County Metropolitan Transportation Authority (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. The objective of this review is to determine and verify the level of performance being reported for transit security function services for LAPD, LASD, LBPD, and Metro's Transit Security Officers during FY 2019 (July 1, 2018 to June 30, 2019).

- LAPD Contract No. PS5862100LAPD24750: On March 1, 2017, Metro entered a 5-year firm fixed unit rate contract with LAPD to provide transit law enforcement services within the specified coverage areas as indicated in Attachments 1 and 2 of the Statement of Work (SOW) in the contract. This contract became effective on March 1, 2017, and ends on June 30, 2022. The total contract amount is not-to-exceed $369,330,499.

- LASD Contract No. PS5863200LASD24750: On September 1, 2017, Metro entered a 5-year firm fixed unit rate contract with LASD to provide transit law enforcement services within the specified coverage areas as indicated in Attachments 1 and 2 of the SOW in the contract. This contract became effective on September 1, 2017, and ends on June 30, 2022. The total contract amount is not-to-exceed $246,270,631.

- LBPD Contract No. PS5862300LBPD24750: On March 23, 2017, Metro entered a 5-year firm fixed unit rate contract with LBPD to provide transit law enforcement services within the specified coverage areas as indicated in Attachments 1 and 2 of the SOW in the contract. This contract became effective on March 23, 2017, and ends on June 30, 2022. The total contract amount is not-to-exceed $30,074,628.

Except for different service coverage areas specified in Attachments 1 and 2 of each contract, the three contracts have the same or similar scope of work including specific responsibilities, training requirements, reporting requirements (including reports and documents submission), monthly key performance indicators (KPI), and billing requirements. The contracts state that the Contractor is responsible for the following:

- Augment Contractor or regional response to 911 emergency, priority, and routine calls for service;

- Crime analysis and reporting;

- Augment Contractor or regional criminal investigations, accident investigations, and law enforcement response to major incidents;

- Reduce system-wide vulnerability to terrorism;

- Conduct joint anti-terrorism drills, training sessions, and intelligence sharing with other local, state, and federal law enforcement agencies;

- Provide access to K9 explosive detection on an on-call overtime basis;

- Ride Metro buses and trains, patrol bus and rail stations/corridors, and maintain high visibility at key Metro critical infrastructure locations;

- Provide law enforcement presence during periodic fare enforcement and passenger screening operations;

- Remove persons without a valid transit fare from buses, trains, buildings, and stations;

- Conduct mutually agreed upon grade crossing enforcement operations;

- Respond to and resolve incoming calls for service from Metro bus, rail, and security dispatch centers;

- Respond to and resolve incoming complaints from Metro's Transit Watch program;

- Respond to and resolve citizen complaints related to criminal activity;

- Conduct proactive anti-crime operations when not handling a dispatched call;

- Participate in Metro emergency and disaster preparedness planning and drills;

- Collaborate with social service agencies to address the impact of homelessness on the transit system;

- Enforce Metro's Customer Code of Conduct;

- Attend weekly coordination meetings or other meetings as required; and

- Provide additional law enforcement services to address unforeseen events/requirements.

In addition to contract transit law enforcement services, Metro's SSLE Department employs Transit Security Officers (TSO) who provide security over Metro facilities, perform fare compliance checks, and patrol bus and rail systems. Metro TSOs are not sworn or certified law-enforcement officers and do not have authority to detain or arrest. During FY 2019 Metro Security had a total of 181 budgeted positions, or which 152 were filled and 29 were vacant.

3. Objectives, Scope and Methodology

On February 23, 2017, the Metro Board passed a motion directing that "the Inspector General be tasked with annually auditing each law enforcement services contract to determine how key performance indicators are measuring up against actual performance metrics. The audit is to ensure that Metro is receiving the services it is paying for."

The overall objective of the audit is to evaluate transit security performance provided by each of the three Contractors and Metro's System Security and Law Enforcement Department during FY 2019. In particular, the audit will review, analyze, and report on:

- Actual performance of the performance indicators in the transit law enforcement services contracts.

- Contractor (LAPD, LASD, LBPD) adherence to requirements in matters such as:
  - Personnel and training,
  - Reporting,
  - Community Policing Plan,
  - Billing, and
  - Security and Emergency Preparedness.

- Effectiveness of fare compliance checks.

- Number of fare validation checks accomplished in FY 2019, compared to fare checks made in the previous 3 years.

- Number of citations issued in FY 2019, compared to the past 3 years.

- Crime statistics for Metro in FY 2019, compared to the statistics for the past 3 years.

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

4. Review Results

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

A. Resource Monitoring and Oversight

Metro has and will continue to have a substantial investment in resources devoted to system safety and security. Over the five-year contract period Metro has committed over $646 million to pay for contracted law enforcement services. Ensuring that these resources are effectively and efficiently used is important.

Metro's SSLE Department is charged with ongoing oversight of the contracted law enforcement services as well as the operations of Metro Security. We reviewed and evaluated the oversight and supervision provided by SSLE to ensure compliance with contract requirements.

Contract Compliance Monitoring and Oversight

It is important that monitoring and oversight be performed to ensure contract requirements are being complied with. Oversight and monitoring of contracted law enforcement resources has historically been problematic for Metro. Numerous reports have identified the lack of monitoring and oversight as significant issues and concerns, and numerous recommendations have been made to significantly strengthen that monitoring and oversight.

Finding 1: Compliance monitoring and oversight of the law enforcement contracts by Metro's SSLE Department continues to be inadequate during FY 2019.

In our detailed review of invoices submitted and paid for two months we found some instances where contract billings and payments were not in compliance with the contract terms, resulting in overbillings and overpayments. These include:

- The total amount billed and paid for FY 2019 exceeded the estimated cost specified in the contract for Year 2 for all three contracts.

- A significant number of the labor classifications included on invoices were not on the approved list of maximum fully burdened hourly rates for LAPD. The total amount billed for these labor classifications was about $6.8 million for the two months reviewed.

- Hours billed to Metro and paid to LAPD included hours for compensated time off and union benefit payments rather than for actual hours worked as required by the contract, totaling $1.1 million for the two months reviewed.

- There were minor amounts overbilled and overpaid due to differences in approved labor classifications rates and the rates billed for LAPD and LBPD.

- Tracking and billing for equipment was not in compliance with the contract.

We also found some instances of non-compliance with requirements related to the qualifications and training of personnel assigned, reports and information being provided to Metro, equipment provided under the contract, and providing appropriate support for invoices submitted. These include:

- Minor instances of non-compliance with contract requirements related to personnel and training for LAPD.

- Not all reports required by the contract to be submitted to Metro were provided.

For more information see Section E: Compliance with Contract Requirements of this report for our discussion and recommendations.

Recommendation 1: The Metro SSLE Department should

a) **Significantly strengthen ongoing monitoring and oversight of compliance with the terms of the law enforcement services contracts.**

b) **Review billings and payments for all twelve months of FY 2019 since this audit focused on only two months.**

c) **Formally amend the terms of the contracts, if needed.**

Ensuring Contracted Law Enforcement Personnel Presence

Providing monitoring and oversight of contract law enforcement personnel assigned to ensure they are actually present and providing the service Metro is paying for is a top priority. Metro has had difficulty in ensuring that law enforcement personnel assigned to Metro are actually present. There has not been an effective means of verifying that personnel charging time on the Metro contract are actually present and providing the contracted services.

Establishing an effective mechanism for ensuring the presence of contracted law enforcement personnel was a key element of the new law enforcement service model implemented with the current contracts. In 2015, the Transit Policing Working Group (TPWG), chaired by a Metro Director (and current Chair), developed the current policing model for Metro. A key priority adopted by the TPWG was to "improve the level of accountability for law enforcement and security services through improved operational data availability and quality."

The key strategy established by the TPWG for accomplishing this priority was through the use of the smartphones issued to law enforcement personnel to use as a validator for TAP fare cards via a Mobile Phone Validator (MPV) application developed for the smartphone. These smartphones, as do all smartphones, have "location services" or GPS capabilities that can be used to track and monitor the location of each smartphone user. Using this capability would provide a reliable and verifiable mechanism for Metro to ensure that contracted law enforcement resources are being used effectively and as planned.

Finding 2: Metro's SSLE Department has made little progress implementing a mechanism for verifying contracted law enforcement actual presence using smartphone location services / GPS.

The smartphones issued to contracted law enforcement personnel, like all smartphones, have the capability for "location based services." Location based services were developed by integrating data from satellite global positioning systems (GPS), cellular networks, and mobile computing to provide services based on the geographical locations of smartphones and users. Currently, Metro has not provided enough smartphones to allow all contracted law enforcement personnel assigned to use them or policies defining and requiring their use. Metro has also not developed a capability to use the location information as an accountability tool to compare with invoices submitted for contract law enforcement services,

These services are required for cellular service providers to identify the location of each smartphone and route calls and data to and from the nearest cell tower. Smartphone locations are identified and tracked every few seconds even when the phones are not being used. This location information is stored by numerous entities, including the cellphone service provider, Google, and other companies that use this information for marketing and market research.

Real time and historic location based information is used by many smartphone apps. The following are a few apps and examples of the use of location based information. These are intended to provide information on how location based services could potentially be used to monitor and provide oversight of Metro's contracted law enforcement resources.

- The ***Google Maps*** app (google.com/maps/timeline) is often used for navigation assistance, but can also provide historical location information for users with smartphones that have Google location tracking enabled. This information is used by Google maps to display locations that a user has visited in the past. For example, when visiting a favorite restaurant Google maps will show when you last visited that restaurant. This historical location information can also be used to display location information for that user over a period of ten years or more. Information for a specific day, including time of departure, route, time of arrival, and other relevant information can be accessed and displayed.

- ***Life360*** (life360.com) is another popular app that uses location tracking and history. Life360 is a family social networking location-based service designed primarily to allow friends or family members to share locations with each other. Its most popular use is by parents to keep track of their children. Parents can be notified when their children arrive at or leave school or home, or when they travel outside a predefined area. The app can also be used to monitor driving habits, including excessive speeds and texting while driving. Location history can be viewed for a defined period of time. **Famisafe** (famisafe.wondershare.com) is another similar app using location tracking and history.

In addition, several apps have been developed specifically to monitor and track employees or other resources in the field using location based services. The following are two such examples. These examples are provided to illustrate how Metro contracted law enforcement resource locations and activities could potentially be monitored and tracked for contract compliance, but are not endorsements of these particular apps or companies.

- ***AllGeo*** (allgeo.com) is a company that provides a series of apps using smartphones and location based services. Their GPS tracking and visualization app provides the ability to monitor employee time and location in the field. Their GPS Time and Attendance app automates the process of employees clocking in and out and can be used to determine actual work hours. Other apps can provide additional functions including dispatch, worker safety monitoring, and workflow management. The company can also develop apps that meet specific needs.

- ***Lighthouse*** (lighthouse.io) provides a series of apps and services specifically designed for monitoring and overseeing security services. This includes location monitoring providing continuous tracking of security personnel using a combination of technologies. It can also provide time and attendance monitoring, with shifts starting and ending using the Lighthouse mobile app and use location information to ensure your employees are where they should be. Lighthouse dashboards and reports can provide information on operations, with reports stored securely in the cloud for seven years.

Recommendation 2: The Metro SSLE Department should develop an effective approach to monitoring and overseeing contracted law enforcement resources to ensure the resources Metro is paying for are actually present and providing services. This should be accomplished using the smartphones issued to contract law enforcement personnel, an app that uses these smartphones' location based services capabilities and a policy defining and requiring the use of the smartphones.

B. Trends in Reported Crime, Perceptions of Safety, and Complaints

There are three key outcome measures that can be used to evaluate the effectiveness and trends of Metro's safety and security approach and program. These are the level of reported crime on the system, the perceptions of safety by users of the system, and the number of safety and security complaints made by users of the system. Each of these are described in the following sections.

Reported Crime

Crime and disorder risks within the Metro System include the incidents of crime, general disturbances of the peace, and public safety. These risks are similar to those faced by most communities, albeit in a more specific arena. Crime and disorder risks are measured primarily by the number and severity of crime that occurs within an area.

Finding 3: As reported in the FY 2018 Performance Audit, obtaining complete and accurate reporting of crime that occurs on the Metro System continues to be challenging.

Some crimes that occur on the Metro System are not reported to Metro and therefore cannot be tracked or used to determine trends in crime on the Metro System. This is partially due to the fact that the Metro System operates within multiple jurisdictions with their own law enforcement agencies.

Many calls for service on the Metro System are received directly by local law enforcement agencies. This is due to patrons on the Metro System dialing 911 on their mobile phones to report an incident and to request law enforcement services. These calls would, in most cases, go to the public safety call taking and dispatch center of the local law enforcement agency. Once the call is received, the incident or call would be responded to and handled by the local law enforcement agency. The call would be given a priority and would be responded to and handled as deemed appropriate by the local law enforcement agency given the relative priority of other calls the agency is handling.

These law enforcement agencies respond to and handle an unknown number of crimes that occur within the Metro System. This is the case in the areas of the Metro System that are serviced by the LASD, much of which is within the jurisdiction and service area of municipal law enforcement agencies. In many cases, the LASD is not informed of these crimes and so has no way to track or report them. In other cases, the LASD may receive a copy of the crime report, but these crimes are not added to the crimes reported to Metro as having occurred within the system because they are not responded to and handled by the LASD.

In the LAPD service area of the Metro System, LAPD neighborhood patrol units respond to and handle many crimes that occur within the Metro System. An unknown number of these crimes are not reported to the LAPD Transit Policing Division and so are not tracked and reported to Metro. The LAPD has developed an approach and system to identify these crimes and include them in the tracking and reporting of crime that occurs within

the LAPD service area of the Metro System. Reporting of these crimes to the LAPD Transit Policing Division improved during FY 2019 according to the LAPD Transit Policing Division.

Recommendation 3: The Metro SSLE Department should work with contract and other law enforcement agencies to improve the complete and accurate reporting of crime that occurs on the Metro System.

Reported Part I Crime

The Federal Bureau of Investigation (FBI) Uniform Crime Reporting system defines serious crime (Part I) as homicides, rape, robbery, aggravated assault, burglary, larceny-theft, motor vehicle theft and arson. The Uniform Crime Reports (UCR) are official data on crime in the United States, published by the FBI. UCR is a nationwide, cooperative statistical effort of law enforcement agencies voluntarily reporting data on crimes. Crime statistics are compiled from UCR data and published annually by the FBI in the Crime in the United States report series.

Reported Violent Crime

Part I violent crime[1] includes homicide, rape, aggravated assault, and robbery. As shown in Exhibit 1, total reported violent crime on the Metro System increased by 2% between FY 2018 and FY 2019, although reported violent crime decreased 17% between FY 2015 and FY 2019. Some of this change may be due to a 15% decline in ridership over the five-year period. Total reported violent crime per million riders increased 6% between FY 2018 and FY 2019 and declined 2% over the entire five-year period.

Exhibit 1									
Reported Part 1 Violent Crime on the Metro System									
FY 2015 to FY 2019									
Crime	**FY 2015**	**FY 2016**	**Change**	**FY 2017**	**Change**	**FY 2018**	**Change**	**FY 2019**	**Change**	**Total Change**
Homicide	1	3	200%	3	0%	1	-67%	1	0%	0%
Rape	3	11	267%	5	-55%	16	220%	10	-38%	233%
Robbery	375	404	8%	404	0%	393	-3%	320	-19%	-15%
Agg Assault	370	322	-13%	308	-4%	219	-29%	300	37%	-19%
Agg Assault on Op	30	18	-40%	20	11%	6	-70%	16	167%	-47%
Totals	779	758	-3%	740	-2%	635	-14%	647	2%	-17%
Ridership (Millions)	445.3	428.9	-4%	390.0	-9%	390.9	0%	376.5	-4%	-15%

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[1] In the FBI's UCR Program, violent crime is composed of four offenses: murder and non-negligent manslaughter, forcible rape, robbery, and aggravated assault. Violent crimes are defined in the UCR Program as those offenses which involve force or threat of force.

Exhibit 1									
Reported Part 1 Violent Crime on the Metro System FY 2015 to FY 2019									
Crime	FY 2015	FY 2016	Change	FY 2017	Change	FY 2018	Change	FY 2019	Change	Total Change
Per 1 Million Riders	1.75	1.77	1%	1.90	7%	1.62	-14%	1.72	6%	-2%
Per Day	2.13	2.08	-3%	2.03	-2%	1.74	-14%	1.77	2%	-17%

Source: Analysis of crime reported by LASD for FYs 2015 to 2017, and reported by LAPD, LASD, and LBPD for FY's 2018 and 2019

Note: In the FBI's UCR Program, violent crime is composed of four offenses: murder and non-negligent manslaughter, forcible rape, robbery, and aggravated assault. Violent crimes are defined in the UCR Program as those offenses which involve force or threat of force.

Reported Property Crime

Property crime on the Metro system is also an important consideration. Part I Property Crimes[2] include burglaries, thefts, motor vehicle thefts, and arsons. As shown in Exhibit 2, total reported property crime decreased 2% between FY 2018 and FY 2019 with an overall decrease of 17% during the five-year period from FY 2015 to FY 2019. Reported property crime per million riders increased 1% between FY 2018 and FY 2019, but decreased 1% over the five-year period between FY 2018 and FY 2019.

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[2] In the FBI's UCR Program, property crime includes the offenses of burglary, larceny-theft, motor vehicle theft, and arson. These theft-type offenses involve the taking of money or property, without force or threat of force against the victims. The property crime category includes arson because the offense involves the destruction of property.

Exhibit 2									
Reported Part 1 Property Crime on the Metro System									
FY 2015 to FY 2019									
Crime	**FY 2015**	**FY 2016**	**Change**	**FY 2017**	**Change**	**FY 2018**	**Change**	**FY 2019**	**Change**	**Total Change**
Burglary	16	12	-25%	18	50%	11	-39%	11	0%	-31%
Larceny-Theft	1027	921	-10%	882	-4%	927	5%	944	2%	-8%
Grand Theft Auto	138	128	-7%	101	-21%	71	-30%	31	-56%	-78%
Arson	3	8	167%	4	-50%	2	-50%	1	-50%	-67%
Totals	1,184	1,069	-10%	1,005	-6%	1,011	1%	987	-2%	-17%
Ridership (Millions)	445.3	428.9	-4%	390.0	-9%	390.9	0%	376.5	-4%	-15%
Per 1 Million Riders	2.66	2.49	-6%	2.58	3%	2.59	0%	2.62	1%	-1%
Per Day	3.24	2.93	-10%	2.75	-6%	2.77	1%	2.70	-2%	-17%

Source: Analysis of crime reported by LASD for FYs 2015 to 2017, and reported by LAPD, LASD, and LBPD for FY's 2018 and 2019.

Note: In the FBI's UCR Program, property crime includes the offenses of burglary, larceny-theft, motor vehicle theft, and arson. These theft-type offenses involve the taking of money or property, without force or threat of force against the victims. The property crime category includes arson because the offense involves the destruction of property.

Reported Other Crime

Other significant crime (Part II[3]) reported also provides useful information on the safety and security of the Metro System. Total reported other crime (Part II) on the Metro System increased 3% between FY 2018 and FY 2019, with an overall decrease of 15% during the five-year period from FY 2015 to FY 2019. Reported other crime per million riders increased 5% between FY 2018 and FY 2019, but decreased 1% over the five-year period between FY 2018 and FY 2019.

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[3]In the FBI's Uniform Crime Reporting (UCR) Program Part II, the following categories are tracked: simple assault, curfew offenses and loitering, embezzlement, forgery and counterfeiting, disorderly conduct, driving under the influence, drug offenses, fraud, gambling, liquor offenses, offenses against the family, prostitution, public drunkenness, runaways, sex offenses, stolen property, vandalism, vagrancy, and weapons offenses.

Exhibit 3									
Reported Other Crime (Part II) on the Metro System									
FY 2015 to FY 2018									
Crime	**FY 2015**	**FY 2016**	**Change**	**FY 2017**	**Change**	**FY 2018**	**Change**	**FY 2019**	**Change**	**Total Change**
Battery	450	512	14%	501	-2%	766	53%	772	1%	72%
Battery on Op	63	114	81%	84	26%	74	-12%	83	12%	32%
Sex Offenses	88	120	36%	123	3%	151	23%	117	-23%	33%
Weapons	99	74	-25%	83	12%	50	-40%	43	-14%	-57%
Narcotics	502	292	-42%	341	17%	138	-60%	187	36%	-63%
Trespassing	160	197	23%	83	-58%	59	-29%	75	27%	-53%
Vandalism	321	375	17%	291	-22%	154	-47%	155	1%	-52%
Totals	1,683	1,684	0.1%	1,506	-10.6%	1,392	-7.6%	1,432	3%	-15%
Ridership (Millions)	445.3	428.9	-4%	390.0	-9%	390.9	0%	383.5	-2%	-14%
Per 1 Million Riders	3.78	3.93	4%	3.86	-2%	3.56	-8%	3.73	5%	-1%
Per Day	4.61	4.61	0%	4.13	-11%	3.81	-8%	3.92	3%	-15%

Source: Analysis of crime reported by LASD for FYs 2015 to 2017, and reported by LAPD, LASD, and LBPD for FY's 2018 and 2019.

Note: In the FBI's Uniform Crime Reporting (UCR) Program Part II, the following categories are tracked: simple assault, curfew offenses and loitering, embezzlement, forgery and counterfeiting, disorderly conduct, driving under the influence, drug offenses, fraud, gambling, liquor offenses, offenses against the family, prostitution, public drunkenness, runaways, sex offenses, stolen property, vandalism, vagrancy, and weapons offenses.

Trends in reported crime over the five-year period for each rail line, bus operations, and for Union Station are provided in Appendix A of this report.

Trends in Rider Perceptions of Safety

Perception of crime and disorder on the Metro System, and any mass transit system for that matter, creates a risk to the confidence in safety held by passengers and Metro employees and poses a risk to the reputation of Metro as a safe and secure system. Passengers who perceive the system to be unsafe will not use the service and therefore reduce the number of people using transit and Metro's ridership.

Based on Metro's On-Board Customer Satisfaction Surveys conducted during FYs 2015 to 2019 the percentage of riders responding they feel safe either waiting for a train or riding a train declined between FY 2015 and FY 2019. In FY 2015, 84% of riders responded they felt safe waiting for a train, compared to 79% for FY 2019. Similarly, in FY 2015 83% of riders responded they feel safe riding a train, compared to 77% for FY 2019, as shown in Exhibit 4 on the following page.

Exhibit 4									
Metro Rider Perceptions of Safety of Train and Bus System									
FY 2015	**FY 2016**	**Change**	**FY 2017**	**Change**	**FY 2018**	**Change**	**FY 2019**	**Change**	**Total Change**
Percentage Responding Feel Safe Waiting for a Train									
84%	82%	-2.4%	80%	-2.4%	82%	2.5%	79.0%	-3.7%	-6.0%
Percentage Responding Feel Safe Riding a Train									
83%	81%	-2.4%	79%	-2.5%	79%	0.0%	77.0%	-2.5%	-7.2%
Percentage Responding Feel Safe Waiting for a Bus									
85%	88%	3.5%	86%	-2.3%	87%	1.2%	87.0%	0.0%	2.4%
Percentage Responding Feel Safe Riding a Bus									
89%	91%	2.2%	90%	-1.1%	90%	0.0%	91.0%	1.1%	2.2%
Source: Metro On-Board Customer Satisfaction Surveys Conducted during FYs 2015 to 2019									

As this exhibit shows, the percentage of riders responding they feel safe either waiting for a bus or riding a bus increased between FY 2015 and FY 2019. In FY 2015, 85% of riders responded they felt safe waiting for a bus, compared to 87% for FY 2019. Similarly, in FY 2015 89% of riders responded they feel safe riding a bus, compared to 91% for FY 2019.

These changes in perceptions of safety are small and within the margin of error for the survey. However, it is important to continue to monitor rider perceptions of safety on the Metro System and to develop strategies to address concerns and improve that perception.

Trends in Complaints Regarding Safety and Security

Another important indicator of the public or riders' perception of the safety of the Metro System is the number of complaints received regarding safety and security. Metro Customer Relations tracks complaints received by category using the C-CATS complaint tracking system.

During the period from FY's 2015 to 2019 rider complaints regarding passenger safety or conduct issues were not among the top ten complaints on the bus system. However, on the rail system, rider complaints regarding passenger safety or conduct issues were the second most common complaint of the top ten complaints for FY's 2015 to 2017. For FY's 2018 and 2019, complaints regarding passenger safety or conduct issues dropped to number five of the top ten.

As Exhibit 5 on the following page shows, complaints regarding passenger safety or conduct issues on the rail system increased from 296 in FY 2015 to 381 in FY 2016 and to 458 in FY 2017. These complaints declined by over half for FY 2018 to 223, and decreased further during FY 2019 to 190, a decline of 14.8%. The overall decline in rider complaints regarding passenger safety or conduct issues on the rail system was 35.8% over the five-year period from FY 2015 to FY 2019.

Exhibit 5									
Number of Metro Rider Complaints									
Regarding Passenger Safety or Conduct Issues on the Metro Rail System									
2015	**2016**	**Change**	**2017**	**Change**	**2018**	**Change**	**2019**	**Change**	**Total Change**
296	381	28.7%	458	20.2%	223	-51.3	190	14.8%	-35.8%
Source: Metro Customer Complaint Reports for FY's 2015 to 2019.									

The Metro SSLE Department should continue to monitor rider survey results regarding perceptions of the safety of riders on the Metro System and complaints regarding safety and passenger conduct issues, and develop strategies to address significant rider concerns, improve perceptions, and reduce complaints.

C. Key Performance Indicators (KPIs)

It is essential that Metro clearly define performance expectations for each of the contract law enforcement agencies and use meaningful performance indicators to evaluate how well these expectations are being met. The following Exhibit 6 shows the KPIs included in each of the three law enforcement contracts.

	Exhibit 6				
	Key Performance indicators in Law Enforcement Services Contracts				
	KPI Title	**Definition**	**LAPD**	**LASD**	**LBPD**
1	The number of foot and vehicle patrols of bus stops, transit centers, train platforms, plazas, stations	The total number of patrol minutes per officer spent on the following: • Riding the train/buses • Foot patrols of bus stops/transit centers/train platforms/plazas/stations • Vehicle patrols of bus stops, transit centers, train platforms, plazas, stations	X	X	Train Only
2	Ratio of staffing levels and vacant assignments	The number of officers required to work per contract compared to the number of officers present	X	X	X
3	Ratio of proactive versus dispatched activity	The percentage of time law enforcement personnel spend proactively patrolling the system compared to responding to calls for service	X	X	X
4	Number of bus and train boardings	The number of times contracted law enforcement personnel board buses or trains	X	X	Train Only
5	Incident response times	The time from when the call is received by the police department (dispatch center) to the time when a law enforcement officer actually makes contact at the scene	X	X	X
6	Decreases/Increases in crime	Part 1 & Part 2 crimes per million passenger boardings	X	X	X
7	Number of grade crossing operations	Each agency conducts 1 grade crossing operation per month (minimum 4-hour operation). The focus is on pedestrian safety and vehicle compliance with gates	X	X	X

Exhibit 6					
Key Performance indicators in Law Enforcement Services Contracts					
	KPI Title	**Definition**	**LAPD**	**LASD**	**LBPD**
8	Number of fare enforcement operations	The number of contracted law enforcement agencies operations focused specifically on fare enforcement.	NA	NA	X

To review key performance indicators, we:

- Obtained, summarized, and analyzed the monthly reports on KPIs for FY 2019.

- Determined whether Metro and the three law enforcement agencies jointly developed baseline performance metrics for each KPI in the contract.

- If the baseline performance metrics were developed, compared the baseline performance metrics for each KPI to actual performance for each agency. Discussed with Metro management the reason(s) for any KPIs where actual performance was above the metrics (30% or more), and determined appropriate corrective actions.

- If baseline performance metrics were not developed, determined the reason and timeframe for developing these metrics.

Reporting of Crime and Incident Response Time Indicators

Two of the KPI included in each of the law enforcement contracts were intended to provide information on the outcomes of the law enforcement service provided. These are:

- Decreases/Increases in crime
- Incident response times

The level of crime on the Metro System is clearly the most important indicator of the effectiveness of Metro's SSLE Department and each of the contract law enforcement agencies. Continuing to track and report the level of crime on the system is essential.

Finding 4: As reported in the FY 2018 Performance Audit, aggregate reporting of all reported Part I and Part II crime on the Metro System does not adequately reflect the amount of reported violent crime.

In crime reporting, the emphasis should be on violent crime, which is obviously the most impactful to the Metro System and has the greatest impact on Metro's riders. Metro's reporting of all crime in the aggregate is much less meaningful because the number of violent crimes such as homicide, robbery, and rape is given the same weight as lesser crimes such as larceny, petty theft, and vandalism.

As discussed in Section B of this report, complete and accurate reporting of crime on the Metro System continues to be a challenge.

Exhibit 7 on the following page shows how crime on the Metro System is reported.

Exhibit 7
Reported Part I and Part II Crime
for FY 2019

Crimes Against Persons, Property, and Society

■ Crimes Against Persons   ■ Crimes Against Property   ☐ Crimes Against Society

Crimes Against Society 8%

Crimes Against Persons 56%

Crimes Against Property 36%

Month	Persons	Property	Society
Jul-18	110	67	4
Aug-18	150	95	37
Sep-18	121	92	25
Oct-18	141	86	26
Nov-18	134	130	25
Dec-18	99	93	18
Jan-19	127	95	25
Feb-19	155	111	15
Mar-19	147	88	20
Apr-19	136	88	28
May-19	125	76	38
Jun-19	143	91	20

Recommendation 4: The Metro SSLE Department should provide more detailed information on reported crime to distinguish between violent crime and property and petty crime.

A primary workload for law enforcement is responding to and handling incidents that occur on the Metro System or calls for service. Responding to these calls and effectively handling the incidents that generate these calls is a high priority for ensuring system

safety and security. Calls for service that require a physical response are categorized and dispatched by each of the law enforcement agencies using priority categories. The following are representative of categories used:

- **Emergency Calls:** Are the highest priority and include situations where life or property is in imminent danger. These include crimes in progress such as robberies, rapes, assaults, or burglaries. These also include violent domestic disturbances and reports of individuals with guns or other weapons.

- **Priority Calls:** Include situations that require a fairly immediate police response, with no immediate threat to life or property. These could include disputes, disturbances of the peace, and suspicious activities.

- **Routine Calls:** Include calls where there is no substantial threat to life or property, but a response is needed. These include taking reports on crimes where a significant amount of time has elapsed since the occurrence of the crime as well as quality of life issues that need to be addressed.
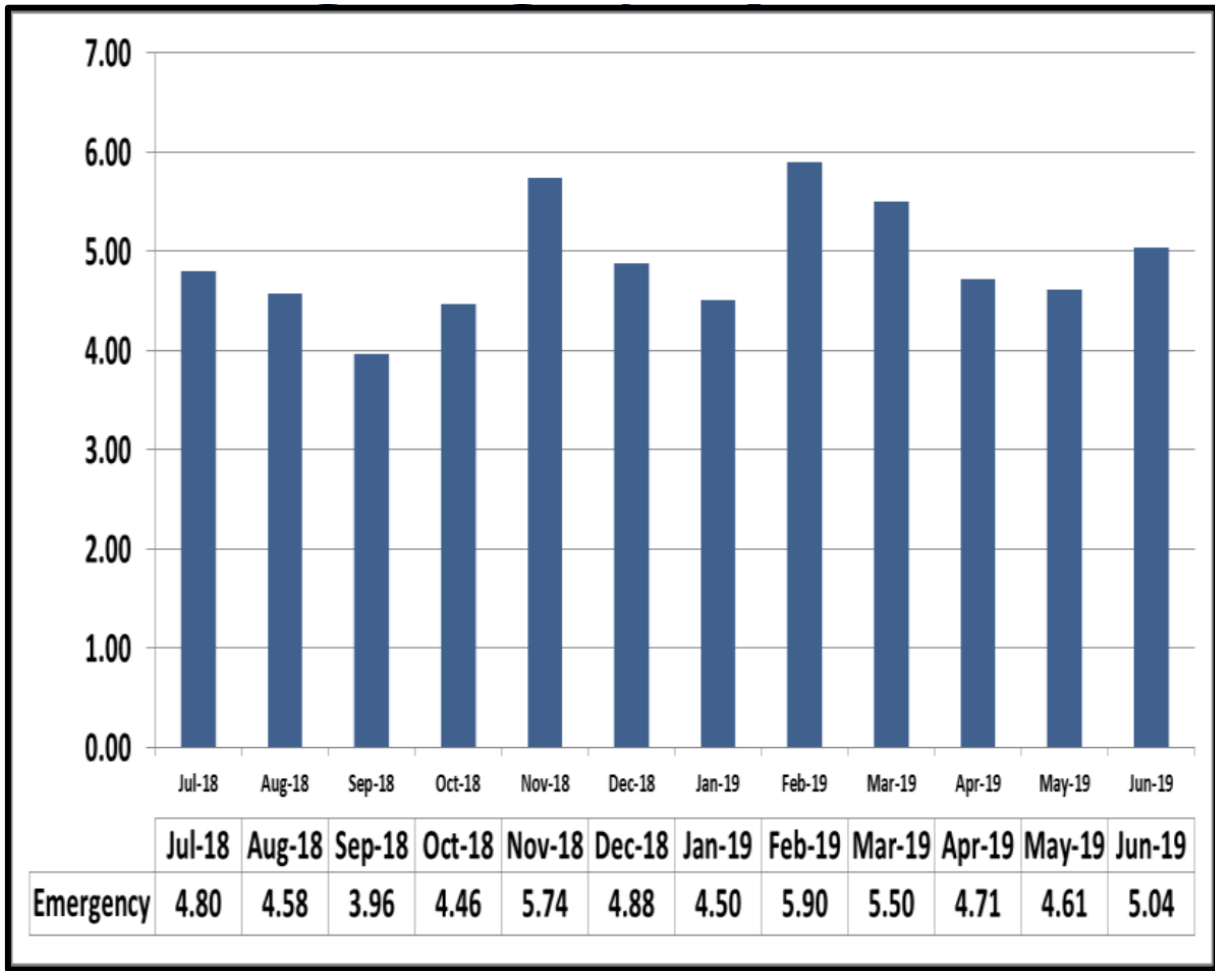
Finding 5: As reported in the FY 2018 Performance Audit, Metro's SSLE Department only collects and reports response time information for emergency calls for service.

While emergency calls for service are obviously the most important calls, tracking and reporting response time on less urgent incidents and calls for service is also important. Often these lower priority calls for service involve quality of life issues and concerns as well as victims of property crimes. A slow response to these incidents can have a negative impact on the perception of the riding public that the system is safe and well protected. In addition, not requiring contract law enforcement agencies to track and report these response times communicates to them and their officers that these calls are not important.

Exhibit 8 on the following page shows that the monthly average emergency incident response times for FY 2019 ranged from 3.96 minutes to 5.9 minutes.

Exhibit 8
Reported Average Emergency Incident Response Times
for FY 2019

	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19
Emergency	4.80	4.58	3.96	4.46	5.74	4.88	4.50	5.90	5.50	4.71	4.61	5.04

Recommendation 5: The Metro SSLE Department should collect and report response time information for all three categories of calls for service.

Visibility of Law Enforcement Security Personnel Indicators

Providing a visible security presence within the Metro System is an important strategy for providing both a sense and reality of safety. Uniformed patrols, usually within the high traffic stations of the system creates a felt presence of safety and security among the riding public. Visible presence in areas frequently used by passengers include areas near fare gates, boarding areas of buses and trains, station entrances, and public parking areas.

Three of the KPIs included in each of the law enforcement contracts were intended to provide information on the visibility of law enforcement security personnel on the system. These are:

- The ratio of proactive versus dispatched activity.

- The number of foot and vehicle patrols of bus stops, transit centers, train platforms, plazas, and stations.

- The number of bus and train boardings.

Contract law enforcement agencies were able to only report on the ratio of proactive versus dispatched activity. This is an important measure related to visibility as it indicates how much of their time is spent being visible, doing problem solving, and other proactive activities including community policing. Exhibit 9 below shows the distribution of time spent by contract law enforcement agencies. As this exhibit shows, the reported proactive law enforcement activity ranged from a low of 89% in August and September of 2018, to a high of 93% in February and June of 2019. This also shows a positive trend.

Exhibit 9

Contract Law Enforcement Proactive vs. Dispatched Activity
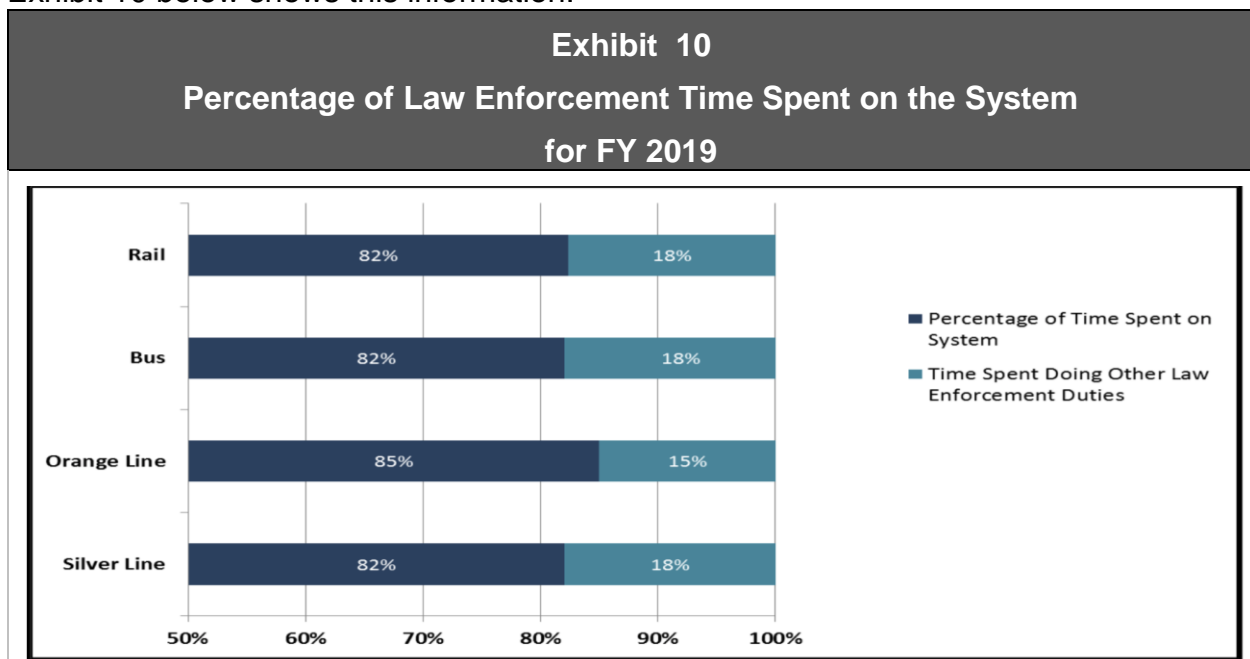
for FY 2019
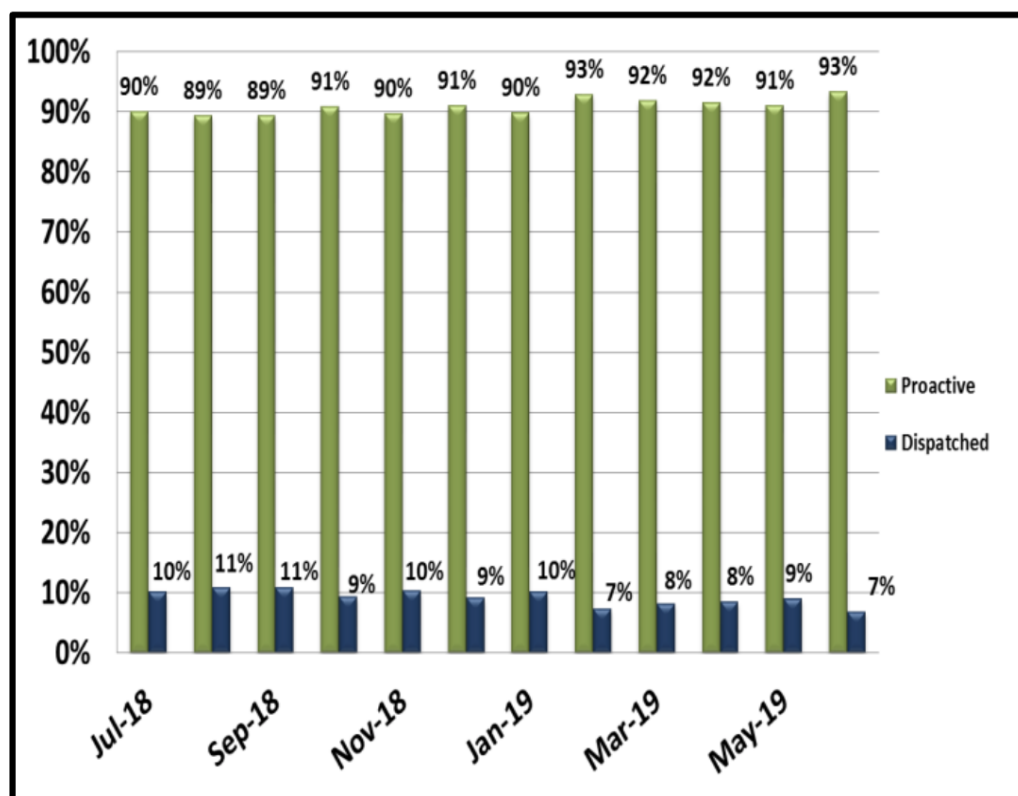
Finding 6: Contract law enforcement agencies were not able to report on two of the Key Performance Indicators outlined in each of the contracts:

- **The number of foot and vehicle patrols of bus stops, transit centers, train platforms, plazas, and stations.**

- **Number of bus and train boardings.**

While these are important indicators and would provide useful information on the level of activity and visibility of contracted law enforcement personnel, it was not practical for the agencies to reliably collect meaningful information for these indicators. This is partly due to the lack of definition for patrols or boardings and partly due to the fact that reliably tracking this information would be difficult even with clear definitions.

In addition, what is important is the amount or percentage of contracted law enforcement time that is actually spent on trains and buses, platforms, and stops. The count of the number of times law enforcement personnel step on or off a train or bus or other locations is not that useful. As discussed in Section B of this report, using the GPS function and data generated could provide reliable and meaningful information on the amount of time contracted law enforcement officers spend on each of these activities.

One new KPI was included in reports for FY 2019 – the percentage of law enforcement time spent on the system. While this is a step in the right direction, it does not provide enough information on how law enforcement personnel spend their time to be meaningful. Exhibit 10 below shows this information.

Exhibit 10
Percentage of Law Enforcement Time Spent on the System
for FY 2019

	Percentage of Time Spent on System	Time Spent Doing Other Law Enforcement Duties
Rail	82%	18%
Bus	82%	18%
Orange Line	85%	15%
Silver Line	82%	18%

Recommendation 6: The Metro SSLE Department should use the Metro issued smartphones' location based services capability and data generated to provide

reliable and meaningful information on the amount of time contracted law enforcement officers spend on various parts of the Metro System.

Law Enforcement Personnel Presence Indicator

One of the KPIs included in each of the law enforcement contracts was intended to provide information on the presence of the contracted law enforcement personnel. This is the ratio of staffing levels and vacant assignments.

This performance indicator is largely the result of past experience where a significant number of the law enforcement assignments that were to be staffed by contracted law enforcement were vacant or were not staffed. This indicator is important in both communicating to the contract law enforcement agencies the need to actually staff contracted assignments and to report how effectively these positions are actually being staffed.

The following Exhibit 11 shows staffing levels versus vacant positions for June 2019 showing high percentages of staffed positions.

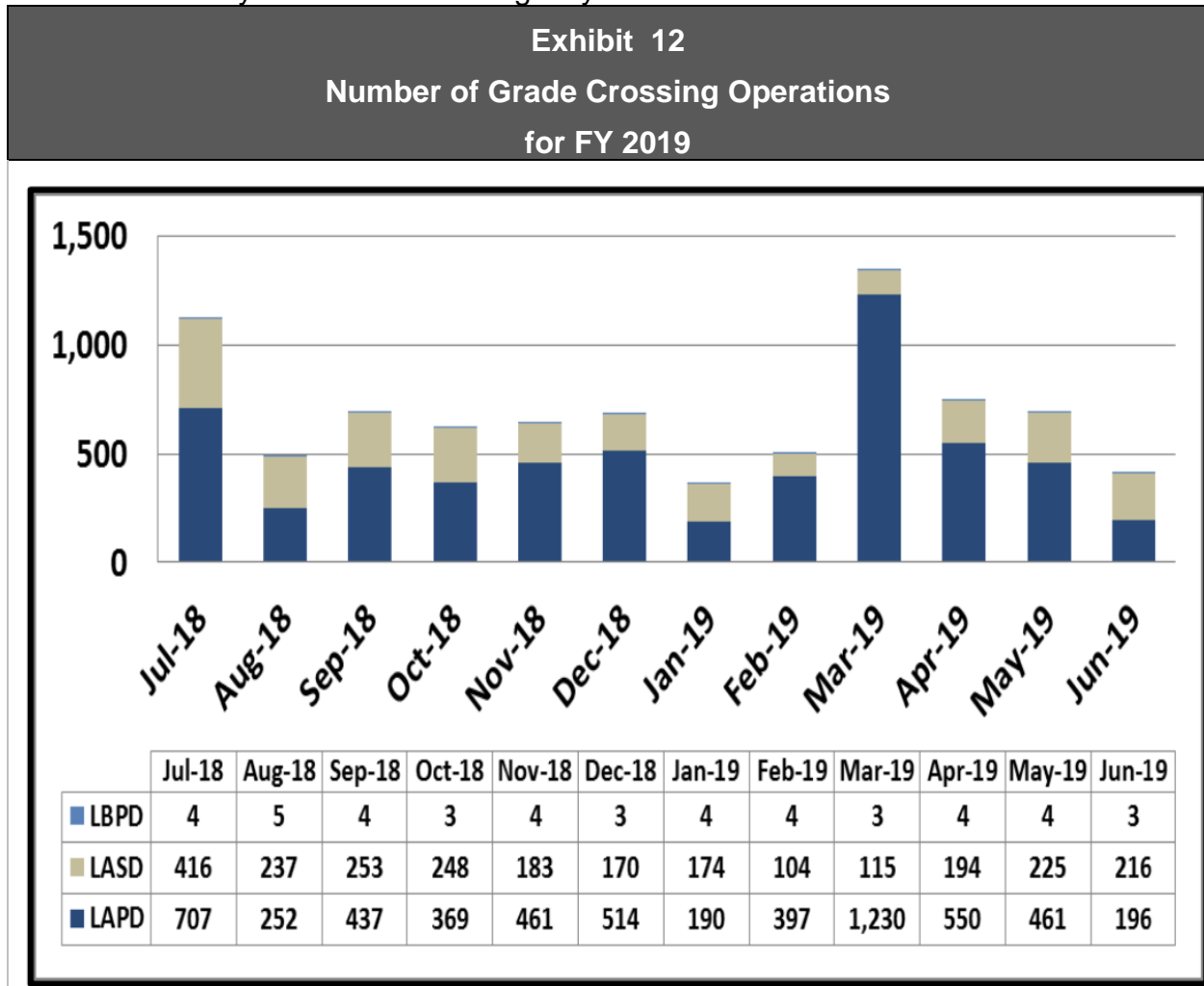| **Exhibit 11** |
| :---: |
| **Ratio of Staffing Levels vs. Vacant Positions** |
| **for FY 2019** |
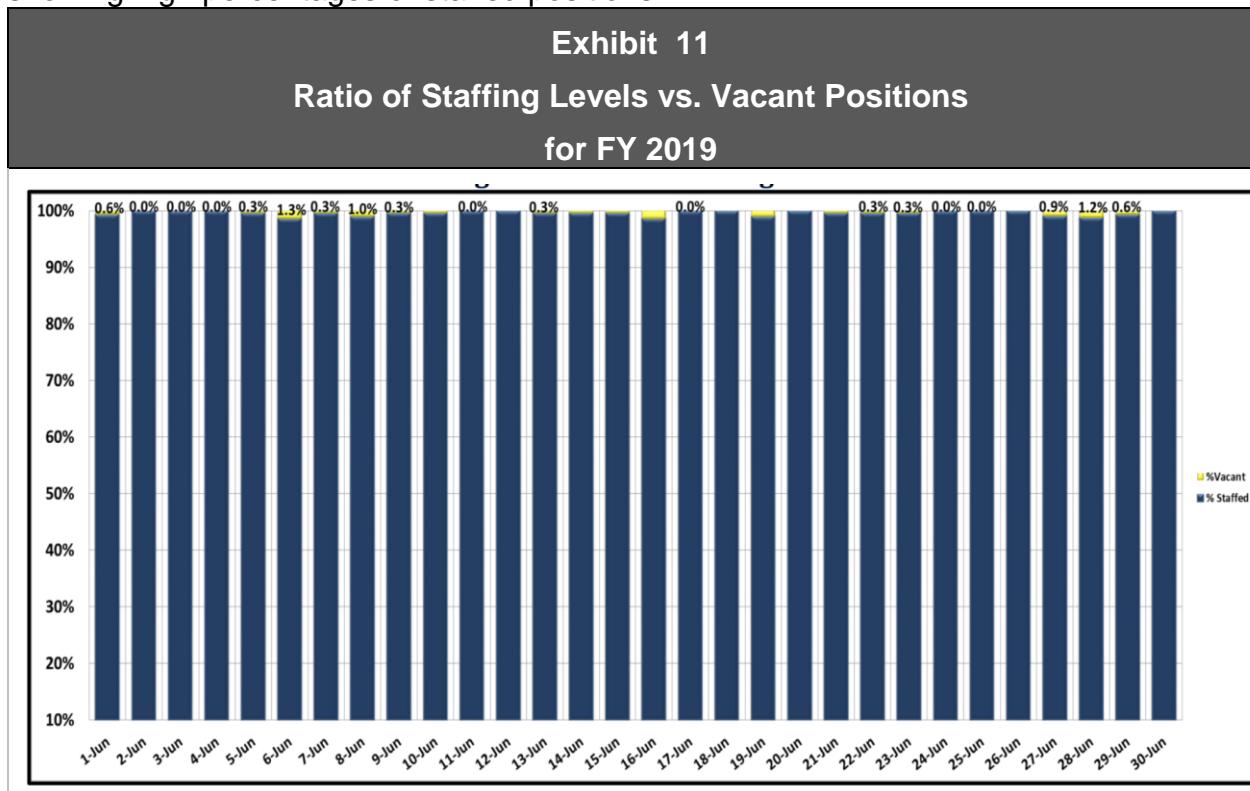
Law Enforcement Personnel Activity Indicators

Two of the KPIs included in law enforcement contracts were intended to provide information on the level of specific activities of the contracted law enforcement personnel. These are:

- Number of grade crossing operations

- Number of fare enforcement operations (Only LBPD – not tracked in FY 2019)

A grade crossing is where a rail line and road or pedestrian walkway come together. Each contracted law enforcement agency is required to conduct grade crossing operations to enforce grade crossing rules and improve pedestrian safety. Each of these operations are to be for four hours. Exhibit 12 below shows the number of grade crossing operations for each month by law enforcement agency.

Exhibit 12
Number of Grade Crossing Operations
for FY 2019

	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19
LBPD	4	5	4	3	4	3	4	4	3	4	4	3
LASD	416	237	253	248	183	170	174	104	115	194	225	216
LAPD	707	252	437	369	461	514	190	397	1,230	550	461	196

Baseline Expectations and Potential Performance Indicators

Performance measurement and reporting demonstrates the success or effectiveness of organizational or program activities in addressing a specific need or attaining a specific goal. A meaningful performance measurement framework includes a balanced set of indicators, ensures the collection of sound and reliable indicator data, provides for the analysis and reporting of indicator information and drives service improvement efforts and the testing of new initiatives.

In addition, it is important to establish baseline expectations or targets for each performance indicator. This not only clearly communicates performance expectations; it also can help drive improvements in performance through development and implementation of new strategies.

Finding 7: The Metro SSLE Department has not initiated discussions on reviewing and revising the KPIs to provide more meaningful performance information, nor established baseline performance levels for each KPI.

To establish clear expectations, Metro's SSLE Department should work with contract law enforcement agencies to review and revise the KPIs as well as establish baseline or target performance levels for each KPI.

The following Exhibit 13 provides a list of potential performance indicators as a starting point for discussions between Metro's SSLE Department and contract law enforcement agencies on performance tracking and reporting.

Exhibit 13		
Potential Performance Indicators		
Indicator	**Data Source**	**Comments**
Metro Patrons / Riders Perceptions of Safety and LASD Service		

Percentage of Metro Patrons / Riders who feel safe on the system:
 	
  During the Daytime
 	
  During the Nighttime
	Annual or Bi-annual safety and security survey of Metro Patrons / Riders.	Community surveys have become very common among law enforcement agencies to gauge the level of fear of crime, as well as the level of satisfaction with law enforcement services provided.

Percent of Metro Patrons / Riders who feel likely / unlikely to be crime victims on the Metro system.		
Percent Favorable Impression of Transit Policing Services		
Service Rating - Follow-up		
Service Rating - Problem Solving		
Service Rating - Response Time		
Service Rating - Service Quality		
Service Rating - Fairness		
Service Rating - Helpfulness		
Crime on the Metro System		
Part I Violent Crime (Homicide, Rape, Aggravated Assault, Robbery)	Crime as reported to the FBI Uniform Crime Reporting System, including both crimes	Crime should be tracked and reported by line, with trends tracked over time to identify

Exhibit 13		
Potential Performance Indicators		
Indicator	**Data Source**	**Comments**
	responded to and handled by the contract law enforcement agencies and by other municipal law enforcement agencies.	areas of concern or requiring additional focus.
Part I Violent Crimes per Million Riders	Total Part I Violent Crimes divided by the average number of daily passengers on the line, multiplied by a million.	This indicator will allow comparison as the transit system and ridership continues to expand. This ratio should also be tracked and reported by line over time to identify areas of concern or requiring additional focus.
Part I Property Crime (Burglary, Theft, Grand Theft Auto, and Arson)	Crime as reported to the FBI Uniform Crime Reporting System, including both crimes responded to and handled by the contract law enforcement agencies and by other municipal law enforcement agencies.	Crime should be tracked and reported by line, with trends tracked over time to identify areas of concern or requiring additional focus.
Part I Property Crimes per Million Riders	Total Part I Property Crimes divided by the average number of daily passengers on the line, multiplied by a million.	This indicator will allow comparison as the transit system and ridership continues to expand. This ratio should also be tracked and reported by line over time to identify areas of concern or requiring additional focus.
Part II Crime	Crime as reported to the FBI Uniform Crime Reporting System, including both crimes responded to and handled by the contract law enforcement agencies and by other municipal law enforcement agencies.	Crime should be tracked and reported by line, with trends tracked over time to identify areas of concern or requiring additional focus.
Emergency Call Taking, Dispatch and Response		
Time to Answer 911 Calls (Seconds)	Call center and Computer Aided Dispatch system software.	Each of these are standard performance indicators that should be tracked using basic call center and Computer Aided Dispatch Software.
Percent Calls Dropped		
Call Processing Time (Minutes)		
Emergency Dispatch Time (Minutes)		
Priority Dispatch Time (Minutes)		

Exhibit 13		
Potential Performance Indicators		
Indicator	**Data Source**	**Comments**
Routine Dispatch Time (Minutes)		
Emergency Patrol Response Time (Minutes)		
Priority Patrol Response Time (Minutes)		
Routine Patrol Response Time (Minutes)		
Criminal Investigations		
Violent Crime Clearance Rate	FBI Uniform Crime Reporting	This provides an indication of how effective criminal investigators are at solving crime on the Metro System.
Violent Crimes per Investigator	Number of violent crimes reported divided by the number of investigators assigned to investigate them.	This provides an indication of the level of investigative workload for TSB investigators.
Property Crime Clearance Rate	FBI Uniform Crime Reporting	This provides an indication of how effective criminal investigators are at solving crime on the Metro System.
Property Crimes per Investigator	Number of property crimes reported divided by the number of investigators assigned to investigate them.	This provides an indication of the level of investigative workload for TSB investigators.
Metro Patron / Riders Commendations and Complaints, and Internal Affairs Investigations		
Number of Commendations	Contract law enforcement agency Service Commendation and Complaint Tracking System	Provides an indication of the number of times Metro patrons or riders are pleased with the actions of the contract law enforcement personnel.
Commendations per 100 Contracted Law Enforcement Personnel		Provides for a comparison of performance over time with changes in staffing levels.
Number of Complaints Against Sworn Officers		Provides an indication of the number of times Metro patrons or riders complain about the actions of contract law enforcement personnel.

Exhibit 13		
Potential Performance Indicators		
Indicator	**Data Source**	**Comments**
Complaints per 100 Sworn Officers		Provides for a comparison of performance over time with changes in staffing levels.
Number of Complaints against Metro Security Officers		Provides an indication of the number of times Metro patrons or riders complain about the actions of Metro Security personnel.
Complaints per 100 Metro Security Officers		Provides for a comparison of performance over time with changes in staffing levels.
Number of Internal Affairs Cases	Internal Affairs	Provides an indication of the number of serious allegations against contract law enforcement and Metro Security personnel.
Internal Affairs Cases per 100 Assigned Personnel		Provides for a comparison of performance over time with changes in staffing levels.

Recommendation 7: The Metro SSLE Department should work with the contract law enforcement agencies to review, revise, and adopt KPI's including baseline or target levels of performance for each KPI.

D. Community Policing

According to the U.S. Department of Justice's Office of Community Oriented Policing Services (COPS), community policing is an approach defined by combining the development of partnerships (i.e., the building of relationships) among affected stakeholders and with problem solving. Concerted engagement in these activities ultimately results in transformations within law enforcement organizations and communities as their efforts break down cultural barriers.

Community policing within a transit system should place an emphasis on quality of life issues. The customers of the Metro System must feel safe and secure. The presence of security, in whatever form, must have a "felt presence;" and must be visible and engaged without becoming oppressive and threatening.

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

Each of the law enforcement services contracts contains requirements related to community policing. The specific requirements are:

- The Contractor shall update annually the Metro approved Community Policing Plan. Building and sustaining community partnerships is central to Metro's goal of reducing vulnerability to crime. This will require periodic attendance at community meetings and other events designed to foster Metro's relationship with the community. Contractor's staff shall be provided specific training in Problem Oriented Policing in order to assist Metro in addressing longstanding challenges related to crime, blight, and disorder. The cost of such training and/or exercises are eligible for reimbursement by Metro under this Contract.

- As part of the Community Policing Plan, it is important for the Contractor to incorporate feedback from rail managers into the overall policing strategy. Maintaining a continuous dialogue will foster an operational understanding of the unique challenges associated with policing in a transit environment. The primary goal of these collaborative efforts is to ensure that each of the Divisions are given appropriate coverage and foster the safety of the operators.

To determine the extent to which law enforcement resources servicing the Metro System are following community policing principles we:

- Requested the Metro approved Community Policing Plan for each Contractor to determine if each Contractor:
  - Created or updated the Community Policing Plan?
  - Provided staff with specific training in Problem Oriented Policing to assist Metro in addressing matters related to crime and disorder?

- o Attended community meetings and other events designed to foster Metro's relationship with the community?

- o Have a protocol in place to obtain feedback from bus and rail managers (feedback that will be used in the overall policing strategy)?

- Determined whether each Contractor and Transit Security is using reports of Law Enforcement Service Requests (LESR) as a tool to where crime, fare evasion and other problems occur.

Metro Community Policing Plan

Finding 8: The Metro SSLE Department has made little progress in developing a community policing plan for the Metro System.

During the FY 2018 Performance Audit the Metro SSLE Department stated they were in the process of developing a unified community policing plan instead of having each of the three law enforcement agencies develop individual community policing plans. According to the SSLE, the Metro community policing plan was to accomplish three basic goals:

1. Develop a common understanding of what it means to be "safe/secure" while riding transit

2. Establish policing priorities (such as reducing/preventing crime, reducing sexual assault/harassment, and addressing homelessness)

3. Establish clear accountability measures (transparent crime reporting, commendations/compliant processes, etc.)

The SSLE Department expected to have a draft Metro Community Policing Plan completed by the Fall of 2019. The SSLE Department was not able to provide any information or documentation showing progress toward the development of this plan.

Recommendation 8: The Metro SSLE Department should establish the Metro Community Policing plan and ensure it includes:

- **Specific training in Problem Oriented Policing for law enforcement personnel to assist Metro in addressing matters related to crime and disorder.**

- **Attendance at community meetings and other events designed to foster Metro's relationship with the community.**

- **Protocols to obtain feedback from bus and rail managers that will be used in the overall policing strategy.**

Law Enforcement Service Request (LESR) System

Metro employees, including bus and train operators, maintenance personnel, customer service representatives, and others are the front-line representatives of Metro and have ongoing and direct interaction with the riding public. As such, they are in a prime position to identify and report public safety and law enforcement issues and concerns.

Observation: The LESR system provides good information on Metro employees' safety and security issues and concerns on the System.

During FY 2019, a total of 860 law enforcement service requests were generated by Metro employees. This was a slight reduction from the 935 service requests received during FY 2018.

Review of the requests and responses indicate that law enforcement agencies are using the LESR to identify and resolve issues and concerns. The following Exhibit 14 shows the requests made by Metro employees using the LESR system during FY 2019.

Exhibit 14 Law Enforcement Service Request System Requests for FY 2019	
Problem Identified	**Number Identified**
Passenger Disturbing the Peace	90
Chronic Homeless	69
Fare Evasion	66
Transient(s) Refusing to Leave	62
Threats to Operator	57
Loitering	48
Unruly Passenger(s)	46
Interfering with Bus/Train Operations	32
Unusual Behavior	31
Under the Influence in Public	28
Mental Illness	23
Obstruction of Bus Zone	23
Assault on Bus or Rail Operator	21
Threats to Patron(s)	20
Theft	16
Rowdy Behavior	16
Bike Share Issues	16
Transient(s) at Bus Stop or Train Terminal	15
Alcohol Use at Bus Stop or Train Terminal	14
Non-compliant to Safety Rules and ADA Standards	13

Exhibit 14	
Law Enforcement Service Request System	
Requests for FY 2019	
Problem Identified	**Number Identified**
Graffiti/Vandalism	13
Gang Member(s)	13
Alcohol Use on Bus or Train	13
Sexual Harassment/Indecent Exposure	13
Drug Use or Sale on Bus or Train	12
Playing Music on Bus or Train	12
Eating/Drinking on Bus or Train	11
Trespasser	11
Assault on Patron(s)	10
Objects Thrown at Bus or Train	8
Smoking on Platform / at Station	7
Smoking on Bus or Train	6
Brandishing Firearm	4
Rowdy School Children	4
ROW Obstruction	4
Stealing from Farebox	3
Racial Remarks	3
LAPD and LASD complaints	3
Threats to Custodian	2
Assault on Custodian	1
Brandishing Knife	1
Total	860

Transit Community Policing Training Curriculum

Each of the contracts with the three law enforcement agencies required all contracted law enforcement personnel to attend a course on Transit Policing. This course was to outline Metro's community policing approach for the Metro System. The curriculum was to be developed by Metro prior to the training and cover the topics of:

a) Overview of Metro's Organization Chart, Bus and Rail Operations
b) Mitigating Terrorism in the Transit Environment
c) Impact of Crime and Disorder on Transit Ridership
d) Transit Watch App
e) Metro's Customer Service Expectations
f) Partnering with Metro's Security Team
g) Fare Collection and Fare Evasion
h) Grade Crossing Enforcement
i) Metro Customer Code of Conduct

Observation: Metro's Transit Community Policing Training curriculum covers the topics listed in the contracts.

Metro provided a copy of the Transit Police Training Curriculum as of December 5, 2018. Based on this document, Metro's training curriculum covers the topics listed in the contract.

Specific information on the compliance with the contract requirement that all contracted law enforcement personnel attend this training is provided under the Personnel and Training Requirements in Section E: Compliance with Specific Contract Requirements Section of this report.

The Metro SSLE Department should continue to ensure Community Policing training is provided to contracted law enforcement personnel and update the curriculum to reflect the Metro Community Policing Plan when complete.

E. Compliance with Specific Contract Requirements

The contracts with the three law enforcement agencies each contain specific requirements related to personnel and training, billing, required reports, and other contract requirements.

Overview of Law Enforcement Contract Requirements

Each of these requirements are outlined as follows:

Personnel and Training Requirements (Section 1.2)

Section 1.2 of each contract provides specific requirements for the personnel assigned to provide service to Metro, including the training and experience of these personnel. Each of the law enforcement services contracts provides specific requirements for the personnel assigned under the contract. The following Exhibit 15 shows the personnel and training contract requirements included in each of the three law enforcement contracts.

	Exhibit 15			
	Personnel and Training Requirements in Law Enforcement Contracts			
	Contract Requirements	**LAPD**	**LASD**	**LBPD**
1	Each sworn law enforcement officer/supervisor assigned to Metro must hold an active (Basic, Intermediate, Advanced or Supervisory) California POST Peace Officer's Certificate.	X	X	X
2	Command level officers must hold an active Management or Executive POST Peace Officer's Certificate.	X	NA	X
3	All supervisors and managers must have completed department training equivalent to supervisory and/or advanced POST courses.	NA	X	NA
4	Only POST certified personnel are authorized to provide law enforcement services.	X	X	X
5	Personnel must have completed their probationary period.	X	NA	X
6	Personnel must have a minimum of eighteen months of law enforcement experience.	X	NA	X
7	Personnel must have no current duty restrictions.	X	NA	X
8	All Contractor personnel must attend a Metro safety training immediately following the issuance of a Notice to Proceed. After Notice to Proceed, any new personnel of the Contractor will be required to attend this Metro safety training.	X	X	X

	Exhibit 15			
	Personnel and Training Requirements in Law Enforcement Contracts			
	Contract Requirements	**LAPD**	**LASD**	**LBPD**
9	Within the first six months of assignment, all law enforcement personnel must complete a four-hour training course in Transit Policing.	X	X	X

To determine compliance with these requirements by each of the contracted law enforcement agencies, we selected 30 sworn officers assigned to LA Metro by each of the three Contractors and determined whether law enforcement personnel met the following contract requirements:

a. Each sworn law enforcement officer/supervisor assigned to Metro hold an active California POST (Peace Officer's Certificate).

b. Command level officers hold an active Management or Executive POST Peace Officer's certificates (not required for LASD).

c. Only POST certified personnel are providing law enforcement services.

d. Personnel assigned to the contract:

- Completed their probationary period (not required for LASD);

- Have a minimum of 18 months of law enforcement experience (not required for LASD);

- Have no current duty restrictions (not required for LASD).

e. Personnel assigned to the contract attended the Metro's safety training within the first 6 months, and completed other training required by the contract.

Billing (Section 7.0)

Each contract for law enforcement services includes specific requirements regarding billing for services provided including providing specific supporting documentation. The following Exhibit 16 shows the billing contract requirements included in each of the three law enforcement contracts.

	Exhibit 16			
	Billing Requirements in Law Enforcement Contracts			
	Contract Requirements	**LAPD**	**LASD**	**LBPD**
1	The Contractor's monthly invoice shall be based upon and reflect the actual services provided.	X	NA	X
2	The billings must be accompanied by supporting documentation, to include, but shall not be little to, daily	X	NA	X

Exhibit 16			
Billing Requirements in Law Enforcement Contracts			
Contract Requirements	**LAPD**	**LASD**	**LBPD**
summary of assignments and hours worked and payroll records.			
3	Contractor shall be paid based on actual units of service performed on a daily basis, in accordance with the agreed upon deployment plan/schedule multiplied by the actual fully burdened rate of each personnel deployed in accordance with the Exhibit B of the contract.	X	NA	X
4	Exhibit B: Contractor shall submit for approval of Metro, a list of maximum fully burdened hourly rates for each labor classification as follows: • Sworn Field Personnel (Overtime) • Management/Field Supervisory and Administrative Personnel	X	NA	X
5	The Contractor's monthly invoice shall be calculated as the monthly pro-rata portion of the annual firm fixed rate as specified in the applicable LASD's SH-AD 575 Deployment of Personnel Form. For each job position that did not meet the service levels promised on the Form 575, a credit shall be provided to Metro using the annual estimated cost per position per SH-AD575 divided by 12 months and number of day for the month, multiplied by number of days the position remained unfilled in whole or in part.	NA	X	NA

To determine compliance with these requirements by each of the contracted law enforcement agencies, we:

- Determined whether the total amount billed and paid during FY19 is consistent with the cost limits specified in the contract for FY19 for each contract.

- Reviewed Contractor billings for two months (May and June 2019) and determined whether:

  o Invoices are supported by documentation such as daily summary of assignments and hours worked and payroll records (not applicable for LASD).

  o Invoices were based on actual services provided.

  o Billing rates were consistent with contract terms.

Required Reports (Section 2.1)

Each of the law enforcement services contracts provides specific requirements for the reports to be provided under the contract. The following Exhibit 17 shows the contract report requirements included in each of the three law enforcement contracts.

	Exhibit 17			
	Reporting Requirements in Law Enforcement Contracts			
	Required Reports	**LAPD**	**LASD**	**LBPD**
1	Weekly schedule for each watch or shift. Must include each employee's name, actual hours worked, assignment and rank.	X	X	X
2	Daily summary of work activity for each employee.	X	NA	NA
3	Watch Commander Summary of Major Events of the Day.	NA	NA	X
4	Monthly summary of crime activity, citations issued, arrests made.	X	X	X
5	Monthly summary of commendations and complaints.	X	X	X
6	The number of cases referred for follow-up investigation and the subsequent disposition.	X	X	NA
7	Monthly Report on the number of Part 1 crime cases referred for follow-up investigation and the subsequent disposition.	NA	NA	X
8	After-Action Reports following special operations, emphasis details and/or major incidents.	X	X	X
9	Annual Community Policing Plan.	X	X	X
10	Monthly summary of Problem-Oriented Policing projects.	X	X	X
11	Law Enforcement Sensitive Reports (distribution to Metro's CEO, DCEO, COO, Chief of Risk Safety and Asset Management and Chief of System Security and Law Enforcement).	X	X	NA
12	Executive Summary of Major Events/Incidents on the Metro System (distribution to Metro's CEO, DCEO, COO, Chief of Risk Safety and Asset Management, and Chief of System Security and Law Enforcement).	NA	NA	X

To determine compliance with these requirements by each of the contracted law enforcement agencies, we:

- Determined whether each Contractor provided Metro with the following required reports in a timely manner, with complete information, and in a format that allows Metro to determine the calculation of reported figures:

    o Weekly schedule for each watch or shift.

    o Daily summary of work activity for each employee.

    o Monthly summary of crime activity, citations issued, and arrests made.

    o Monthly summary of commendations and complaints.

    o Number of cases referred for follow-up investigation and the subsequent disposition.

    o After-Action reports following special operations, emphasis details and/or major incidents.

    o Annual Community Policing Plan.

    o Monthly summary of Problem – Oriented Policing projects.

    o Law Enforcement Sensitive Reports.

- Determined whether each Contractor provided Metro with complete and timely data to measure:

    o How assets are assigned and tracked using GPS.

    o The time/date/category/disposition of calls for service.

    o Incident response times.

    o Ratio of proactive versus dispatched activity.

    o Number of criminal citations/infractions/violations issued.

    o Number of misdemeanor and felony arrests.

    o Real Time Crime analysis data.

- Determined whether Metro has provided Contractor personnel with Mobile Phone Validators, Metro Transit Watch tools, Mobile Video Surveillance tools, and access to video feeds where possible. Evaluated whether Contractor personnel are utilizing these tools, or whether any other tools are needed.

- Evaluated whether each Contractor has the necessary tools to communicate with other police/fire agencies, investigate crimes and accidents, prepare reports, and analyze and predict crime trends. Are their methods effective and adequate?

- Reviewed the adequacy of protocols that Metro has developed with each Contractor (LAPD, LASD, and LBPD) for dispatching nonemergency service calls that are not appropriate for the 911 system.

Other Contract Requirements

Each contract for law enforcement services includes additional specific requirements. To determine compliance with these requirements by each of the contracted law enforcement agencies, we:

- Determined whether the Contractor provided the equipment in the quantities listed in Exhibit E of each contract (such as information technology, communication, and field equipment and vehicles).

- Determined whether Metro has an adequate process to verify that the Contractor provides the required equipment/vehicles (not required for LASD and LBPD).

- Evaluated threat analyses and strategies identified by each Contractor to address security threats.

- Determined whether the Contractors responded timely to requests for K9 explosive detection services.

- Determined whether the Contractors responded timely to requests for law enforcement presence during fare enforcement and passenger screening operations.

- Determined whether the Contractors adequately collaborated with social service agencies to address the impact of homelessness on the transit system.

Los Angeles Police Department (LAPD) Contract Compliance

The following sections provide information on the LAPD's compliance with contract requirements.

LAPD Personnel and Training Requirements Compliance

LAPD provided a list of 3,900 sworn personnel names assigned to the Metro contract. We randomly selected 30 sworn officers' names and requested LAPD to provide documentation indicating that law enforcement personnel met the contract requirements.

Finding 9: LAPD was in compliance with the contract requirements related to personnel and training with two exceptions:

- **LAPD was not able to provide POST information for two sworn officers because the officers were no longer with LAPD.**

- **One command level officer did not hold an active Management POST Peace Officer's certificate as required by the contract.**

According to Section 1.2 of the contract, each sworn law enforcement officer/supervisor assigned to Metro must hold an active Basic, Intermediate, Advanced or Supervisory California POST Peace Officer's Certificate. LAPD did not provide POST information for 2 of the selected 30 sworn officers (Lieutenant II and Police Officer II). According to LAPD, these two officers were no longer with LAPD and therefore LAPD did not have access to the officers' information on the State POST system and could not provide it to us.

The contract also required that all command level officers must hold an active Management or Executive POST Peace Officer's Certificate. Based on the information LAPD provided, 3 of the selected 5 command level officers (Captain 3, Commander, and Deputy Chief) were in compliance by holding an active Management POST Peace Officer's certificate.

One of the selected 5 command level officers (Lieutenant I) held an active Advanced POST Peace Officer's certificate instead of the required Management or Executive POST Peace Officer's Certificate. No POST information was provided for 1 of the selected 5 command level officers (Lieutenant II) because this officer is no longer with LAPD and therefore LAPD did not have access to the officer's POST information on the State POST system and could not provide it to us.

The following Exhibit 18 summarizes the results of our review.

Exhibit 18 Los Angeles Police Department Compliance with Contract Personnel and Training Requirements			
Contract Requirements	**Compliance**		**Comments**
	Yes	**No**	
1. Each sworn law enforcement officer/supervisor assigned to Metro must hold an active Basic, Intermediate, Advanced or Supervisory California POST Peace Officer's Certificate.	Yes, although unable to verify for two officers.		Lieutenant II and Police Officer II – POST Peace Officer's certification information was not provided because they are no longer with LAPD.
2. Command level officers must hold an active Management or Executive POST Peace Officer's certificate.		X	Lieutenant I - Advanced POST certificate rather than a Management or Executive POST certificate.
3. Only Post certified personnel are authorized to provide law enforcement services.	Yes, although unable to verify for two officers.		Lieutenant II and Police Officer II – POST Peace Officer's certification information was not provided because they are no longer with LAPD.
4. Personnel assigned to the contract completed their probationary period.	X		
5. Personnel assigned to the contract have a minimum of 18 months of law enforcement experience.	X		
6. Personnel assigned to the contract have no current duty restrictions.	X		
7. Personnel assigned to the contract completed Metro's Safety Training.	X		
8. Personnel assigned to the contract completed training course in Transit Policing.	X		

Recommendation 9: Metro's SSLE Department should continue monitoring the contract requirements for qualifications and training of personnel to ensure compliance.

LAPD Billing Requirements Compliance

On March 1, 2017, Metro entered a five-year firm fixed unit rate contract with LAPD based on LAPD's proposal dated February 21, 2017, for a not-to-exceed amount of $369,330,499. Exhibit 19 below summarizes the amount estimated for each year.

Exhibit 19
Los Angeles Police Department Contract Amounts for Each Contract Year

	Amount
Year 1	$ 70,098,520
Year 2	69,495,306
Year 3	73,652,923
Year 4	76,531,010
Year 5	79,552,740
Total	$ 369,330,499

Finding 10: The total amount billed and paid to LAPD for FY 2019 exceeded the estimated cost specified in the contract for Year 2.

For FY 2019, the total amount billed and paid to LAPD was $81,061,431. Thus, the total amount billed and paid for FY 2019 exceeded the Year 2 contracted amount of $69,495,306 by $11,566,125. Exhibit 20 below summarizes the contract amount and billing and payment amount for Year 2.

Exhibit 20
Los Angeles Police Department Contract Amount and
Billing And Payment Amount for FY 2019

	FY2019 (Year 2)
Contract Amount - Estimated	$ 69,495,306
Billing and Payment - Actual	81,061,431
Difference	$ (11,566,125)

Recommendation 10:

> **A. LAPD should inform Metro of the amount expected to exceed the estimated cost specified in the contract for each year before incurring the costs.**

B. Metro's SSLE Department should continue monitoring LAPD's billings, payments and contract amount to ensure that costs do not exceed the annual estimated contract amount.

C. Metro's SSLE Department should determine if it will be necessary to seek contract award adjustment approval from the Board if at Year 5 they have not recovered excess expenditures.

Finding 11: Nineteen of LAPD's labor classifications on two sampled invoices were not found on Metro's approved list of maximum fully burdened hourly rates. The amount billed for these labor classifications totaled $6,797,562.42.

According to the contract, ninety (90) days prior to the start of each fiscal year, LAPD is required to submit a list of maximum fully burdened hourly rates to Metro for approval. This list should include the maximum hourly direct labor rate and overhead rate for each labor classification for both straight time and overtime. Also, the contract stated that in no case shall the billing rate for personnel exceed the maximum fully burdened rate set for each personnel's labor classification.

On June 13, 2019, LAPD submitted to Metro 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 2018-2019. This list was approved by Metro on August 13, 2019.

We reviewed LAPD's billing for two invoices (invoice no. 19MTADP04 and 19MTADP05). Invoice No. 19MTADP04 was for period from April 14, 2019 to May 11, 2019 in the amount of $5,762,072.97. Invoice No. 19MTADP05 was for the period from May 12, 2019 to June 8, 2019 in the amount of $5,991,204.78. For each of these two 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 June 13, 2019. Based on our review, 19 labor classifications were not found on the approved list of maximum fully burdened hourly rates. The total amount billed for these 19 labor classifications was $6,797,562.42.

Exhibit 21 on the following page summarizes the amount billed for the classifications not found on Metro's approved list of maximum fully burdened hourly rates for full time (straight time) personnel and overtime personnel.

	Exhibit 21				
	Los Angeles Police Department Amount Billed for Each Labor Classification Not found on the Approved Lists of Maximum Fully Burdened Hourly Rates				
CSC/G	19MTADP04		19MTADP05		Total
Full Time (Straight Time) Personnel					
13600	$ 10,774.84		$ 11,086.66		$ 21,861.50
Overtime Personnel					
11160	$ 3,391.84		$ 4,692.50		$ 8,084.34
11172	$ 447.93		$ 62.21		$ 510.14
13580	$ 1,208.39		$ 1,509.83		$ 2,718.22
13600	$ 612.33		$ 821.08		$ 1,433.41
13680	$ 6,561.25		$ 4,761.33		$ 11,322.58
22142	$ 1,478,083.97		$ 1,484,572.51		$ 2,962,656.48
22143	$ 1,193,257.31		$ 1,191,067.52		$ 2,384,324.83
22231	$ 171,398.10		$ 172,873.52		$ 344,271.61
22232	$ 37,754.92		$ 57,894.26		$ 95,649.19
22233	$ 32,790.99		$ 27,209.79		$ 60,000.78
22271	$ 280,236.04		$ 279,039.12		$ 559,275.16
22272	$ 142,500.65		$ 172,743.72		$ 315,244.37
22321	$ 11,166.91		$ 5,193.60		$ 16,360.51
22322	$ 2,524.56		$ 4,671.64		$ 7,196.21
22361	$ 339.45		$ 294.20		$ 633.65
22362	$ 1,193.58		$ 287.34		$ 1,480.93
91840	$ 1,637.02		$ 2,681.87		$ 4,318.89
2214C	$ 219.62		$ -		$ 219.62
Subtotal	$ 3,365,324.87		$ 3,410,376.06		$ 6,775,700.93
Total	$ 3,376,099.71		$ 3,421,462.72		$ 6,797,562.42

Recommendation 11:

A. As required by the contract, LAPD should submit the list of maximum fully burdened hourly rates for all labor classifications in accordance with the contract requirements. For any additional labor classifications not identified in the lists of maximum fully burdened hourly rate for full time (straight time) personnel and overtime personnel, LAPD should submit the revised lists to Metro for approval prior to incurring and billing the cost.

B. Metro's SSLE Department should continue to monitor LAPD's billings to ensure only the approved labor classifications are billed and included in Metro's list of maximum fully burdened hourly rates for full time (straight time) personnel and overtime personnel. Metro should also review the billing rates for all invoices to determine the extent of overbillings.

Finding 12: For the two sampled invoices tested, a total of $1.1 million was identified as billed to Metro and paid to LAPD for compensated time off and union benefit payments rather than for actual hours worked.

As stated previously, Metro's contract with LAPD states the monthly invoice shall be based on actual services provided and supported by daily summary of assignments and hours worked and payroll records. The amounts billed for each type of payment were identified by a code (varcode) listed in the 19 spreadsheets included with the invoices.

We requested and LAPD provided a list of these codes with a description for each code.

We reviewed the hours and amounts billed to Metro and found they included actual hours worked, compensated time off, and union benefit payments. Of the $11.75 million LAPD billed Metro in the two invoices reviewed, $10.64 million (90.5%) was for actual time worked, $1.01 million (8.63%) was for compensated time off, and $97,423 (.83%) was for union benefit payments.

Based on discussions with LAPD staff, LAPD decided to directly bill for compensated overtime and union benefit payments for LAPD full-time employees assigned to the contract. Based on the contract, these costs should be included in the "fully burdened rate" for each labor classification billed. These costs would then be recovered through the billing rate rather than through direct billing.

Exhibit 22 on the following page summarizes the amount billed for actual hours worked, compensated time off and union benefit payments.

	Exhibit 22			
	Los Angeles Police Department Amount Billed by Varcode			
VARCODE	VARCODE DESCRIPTION	19MTADP04	19MTADP05	TOTAL
HW	CURRENT ACTUAL HOURS WORKED ONLY	$1,851,163.65	$1,912,345.77	$ 3,763,509.42
PA	OVERTIME HOURS (1.5)	$3,414,880.78	$3,463,257.61	$ 6,878,138.39
	SUBTOTAL - CURRENT ACTUAL HOURS WORKED AND OVERTIME HOURS	$5,266,044.43	$5,375,603.38	$10,641,647.81
BL	BEREAVEMENT LEAVE (POS OR NEG)	$ -	$ 5,977.07	$ 5,977.07
C1	FML USING 100% SICK	$ 6,488.57	$ 6,488.57	$ 12,977.14
FE	FAMILY ILLNESS - SWORN 100% PAY	$ 18,363.42	$ 34,754.95	$ 53,118.37
FF	FAMILY ILLNESS - SWORN 75% PAY	$ -	$ 1,233.08	$ 1,233.08
FG	FAMILY ILLNESS - SWORN 50% PAY	$ 659.74	$ -	$ 659.74
FH	FLOATING HOLIDAY HOURS TAKEN THIS PAY PERIOD	$ 277.17	$ 1,171.79	$ 1,448.96
FI	FAMILY ILLNESS (POS OR NEG)	$ 466.89	$ 271.15	$ 738.04
HM	HOLIDAY COMPENSATION	$ -	$ 1,334.70	$ 1,334.70
HO	HOLIDAY HOURS (CREDIT OR CHARGE)	$ 13,323.32	$ 144,145.69	$ 157,469.01
LP	LEAVE WITH PAY (POS OR NEG)	$ 49,201.38	$ 80,719.03	$ 129,920.41
MP	MILITARY LEAVE WITH PAY (POS OR NEG)	$ 3,084.12	$ -	$ 3,084.12
PB	HOLIDAY HOURS (STRAIGHT TIME)	$ 44,782.89	$ 39,871.80	$ 84,654.69
PM	PREVENTIVE MEDICINE (POS OR NEG)	$ 8,600.53	$ 5,750.55	$ 14,351.08
SE	BANKED EXCESS SICK TIME - TIME OFF	$ 193.40	$ 306.10	$ 499.50
SF	50% SICK TIME (CREDIT OR CHARGE)	$ 659.74	$ -	$ 659.74
SK	100% SICK TIME (CREDIT OR CHARGE)	$ 72,189.83	$ 57,858.46	$ 130,048.29
SS	75% SICK TIME (CREDIT OR CHARGE)	$ 481.72	$ 10,546.37	$ 11,028.09
VC	VACATION (POS AND NEG)	$ 214,834.01	$ 190,170.34	$ 405,004.35
	SUBTOTAL - COMPENSATED TIME OFF	$ 433,606.73	$ 580,599.65	$ 1,014,206.38
84	OVERTIME (1.5) BALANCE PAID AT TERMINATION/RETIREM	$ 682.81	$ -	$ 682.81
CL	CASH-IN-LIEU SWORN	$ 533.88	$ 533.88	$ 1,067.76
D1	DIVE UNIT	$ 667.35	$ 1,334.70	$ 2,002.05
ER	WORK RELATED TRAINING REIMBURSEMENT - NON TAXABLE	$ -	$ 1,645.69	$ 1,645.69
FP	FLSA OVERTIME PAID	$ 1,537.84	$ 700.18	$ 2,238.02
HY	Smoothing Variation For HW - System Generated	$ (0.03)	$ 2,159.15	$ 2,159.12
ID	I. O. D. PAY	$ 46,053.64	$ 23,895.64	$ 69,949.28
KS	OLD OVERTIME OFF AT STRAIGHT TIME - POLICE	$ 4,075.37	$ 429.03	$ 4,504.40
KT	OLD OVERTIME OFF AT 1 1/2 TIMES - POLICE	$ 7,459.13	$ 3,282.45	$ 10,741.58
MK	LAPD MARKSMANSHIP BONUS (+ OR -)	$ 128.13	$ 128.13	$ 256.26
TB	TRANSIT BENEFIT ADJUSTMENT DOLLAR AMOUNT (NET PAY BENEFIT)	$ 795.91	$ 993.66	$ 1,789.57
TO	OVERTIME TAKEN OFF (1.5)	$ 82.78	$ -	$ 82.78
V2	DAILY ACTING PAY- 5.5%	$ 438.69	$ 312.19	$ 750.88
XA	CURR YR IOD CONVERSION ADJUSTMENT	$ 526.89	$ 147.62	$ 674.51
XR	PRIOR PAY PERIOD ADVANCE COLLECTION	$ (560.58)	$ (560.57)	$ (1,121.15)
	SUBTOTAL - UNION BENEFIT PAYMENTS	$ 62,421.81	$ 35,001.75	$ 97,423.56
	TOTAL	$5,762,072.97	$5,991,204.78	$11,753,277.75

Recommendation 12: Metro should review LAPD's billings and ensure that only actual hours worked are billed in compliance with the contract.

Finding 13: For the two sampled invoices tested, a total of $789.88 was identified as overbilled and overpaid to LAPD for labor classifications with billed rates different from approved rates.

For each of the two invoices (invoice No. 19MTADP04 and 19MTADP05) selected for testing, we compared the hourly rates billed to the approved revised lists of maximum fully burdened hourly rates for full time (straight time) personnel and overtime personnel that LAPD submitted to Metro on June 13, 2019. We found that that the fully burdened hourly rate that LAPD billed for straight time exceeded the maximum fully burdened hourly rate for two labor classifications. We identified a total amount of $789.88 as overbilled and overpaid to LAPD.

Exhibit 23 below summarizes the overbilled and overpaid amount for the labor classification with rate differences.

							Exhibit 23

Exhibit 23

Los Angeles Police Department Overbilled and Overpaid Amount due to Labor Classification With Rate Difference

CSC/G	EmpID	VarDate	Billed Rate	Maximum Rate	Rate Difference	Hour	Overbilled/ Overpaid Amount
invoice no. 19MTADP05							
22510	047645	5/27/2019	$ 667.35	$ 287.17	$ 380.18	1	$ 380.18
22443	013315	5/27/2019	$ 667.35	$ 257.65	$ 409.70	1	$ 409.70
						Total	$ 789.88

Recommendation 13:

   A. **LAPD should return the overbilled and overpaid amount of $789.88 to Metro.**

   B. **Metro's SSLE Department should continue monitoring LAPD's billings to identify and resolve billing discrepancies.**

   C. **Metro's SSLE Department should work with LAPD to review all invoices for FY 2019 for billings exceeding the allowable rates by classification.**

LAPD Compliance with Required Reports

We requested LAPD to provide the reports with date received showing that LAPD submitted the required reports in a timely manner, with adequate information, and in a format that allows Metro to determine the calculation of reported figures.

Finding 14: LAPD met 6 out of 9 contract requirements for submitting required reports to Metro. The reports were submitted with adequate information and in a format that allows Metro to determine the calculation of the reported figures.

LAPD provided various reports including Watch Commander's Daily Reports for May 15, 2019 and June 10, 2019, Weekly After-Action Reports and Work Summary Report for May 2019 and June 2019, and KPI Reports for July 2018 to June 2019.

We reviewed all the reports provided and found that LAPD met 6 out of the 9 contract requirement for required reports. These reports were submitted with adequate information and in a format that allows Metro to determine the calculation of the reported figures.

LAPD did not submit the following reports to Metro:

   • Weekly schedule for each watch or shift.

   • Daily Summary of work activity for each employee.

- Monthly Summary of Problem-Oriented Policing projects reports.

For Law Enforcement Sensitive Report, this report refers to "after action reports and intelligence briefings" and therefore copies were not provided. We confirmed with the previous Chief of System Security and Law Enforcement that LAPD submitted this information as needed.

Exhibit 24 below summarizes the required reports and the results of our review.

	Exhibit 24		
	Los Angeles Police Department Compliance with Contract		
	Reporting Requirements		
	Required Reports	**Compliance**	**Comments**
1	Weekly schedule for each watch or shift. Must include each employee's name, actual hours worked, assignment and rank.	No	LAPD did not submit weekly schedule for each watch or shift.
2	Daily summary of work activity for each employee.	No	Per LAPD, Watch Commander's Daily Report including Daily Activity Log were not submitted because it's too voluminous but available to Metro upon request.
3	Monthly summary of crime activity, citations issued, arrests made.	Yes	
4	Monthly summary of commendations and complaints.	Yes	
5	The number of cases referred for follow-up investigation and the subsequent disposition.	Yes	TSB Significant Arrests.
6	After-Action Reports following special operations, emphasis details and/or major incidents.	Yes	Weekly After-Action Report.
7	Annual Community Policing Plan.	Yes	LAPD indicated Metro SSLE Department is working on developing a joint community policing plan.
8	Monthly summary of Problem-Oriented Policing projects.	No	No information provided.

	Exhibit 24		
	Los Angeles Police Department Compliance with Contract Reporting Requirements		
9	Law Enforcement Sensitive Reports (distribution to Metro's CEO, DCEO, COO, Chief of Risk Safety and Asset Management and Chief of System Security and Law Enforcement)	Yes	Confirmed with previous Chief of System Security and Law Enforcement that LAPD submitted this information as needed.

Recommendation 14: Metro's SSLE Department should monitor LAPD's submission of reports to ensure all the required reports are submitted in a timely manner and with complete information to allow Metro to determine the calculation of the reported figures.

LAPD Equipment Requirements Contract Compliance

Section 5.0 of the contract required LAPD to provide the equipment as listed in Exhibit E. There are four categories listed in the Exhibit E. The four categories listed below are the property that LAPD is required to provide. Each category listed out the items needed.

A. Information Technology (IT) Equipment
B. Communication Equipment
C. Vehicles
D. Field Equipment

Observation: LAPD did not provide the equipment in the quantities listed in Exhibit E of the contract due to:

- **Items were determined to be no longer necessary or obsolete and funds were reallocated and approved by Metro for other purchases.**

- **The number of vehicles purchased were adjusted to keep within the contract funds.**

The equipment and vehicles provided by LAPD has been tracked on an Excel spreadsheet. This spreadsheet listed items and quantities specified in Exhibit E of the contract and items and quantities LAPD provided per LAPD Asset List. Based on the information provided, some equipment were determined to be no longer necessary or obsolete and funds were reallocated and approved by Metro for other purchases. Also, the number of vehicles purchased were adjusted to keep within the contract funds and to purchase specialized vehicles (K9).

Metro's SSLE Department should consider submitting an amendment to the contract to reflect the more up to date LAPD equipment requirements. Exhibit 25 on the following page summarizes the required quantities compared to the quantities provided.

	Exhibit 25			
	Los Angeles Police Department			
	Comparison of Contracted and Provided Equipment			

No.	Item	Exhibit E	Asset List	Comments
	A. IT Equipment			
1	Handheld radios	60	0	MTA Internal Memo dated June 21, 2019 approved the use of radio funding for handheld radios, radio chargers and radio batteries to purchase Body Worn Video for all full-time sworn personnel.
2	Astro Radio Charger	6	0	
3	Radio batteries	60	0	
4	Vehicles MDC's Software Cost	76	74	1 for each of the vehicles
5	MDC's Annual License Renewal	76	74	1 for each of the vehicles
6	Radios for vehicles	76	79	1 for each of the vehicles plus 5 K9 vehicles
7	New Server for a new command location	1	0	No longer necessary
8	Computer Workstation Software	50	96	Included with the cost of computers provided by LACMTA under Exhibit F
9	Smart Phone Data Plan	10	0	No longer necessary; Verizon data plan was cancelled as of March 2019
10	Smart Phones	10	0	
	B. Communication Equipment			
11	Watch Commander Office with associated monitors, etc.	1	various	Various equipment provided to build the Watch Commander Office
12	MCC 7100 or TACPAC Radio Console for dispatch	1	1	
13	Ring down hardline from LAPD to Metro Rail and Bus Center	2	8	
14	Airship Downlink	0	1	Email from LAPD to LACITY indicating that Metro will take care of the cables and connectors. No other documents were provided.
	C. Vehicles			
15	BW-MFF	21	10 Ford Explorer	
16	BW-Patrol	48	50 Ford Explorer	
17	Dual Purpose	6	4 Ford Explorer; 2 Dodge Charger	Number of vehicles purchased were adjusted to keep within contract funds. July 18, 2019, Metro issued an Internal Memo approving K-9 funding for fiscal years 2019 to 2022.
18	Motor Pool	5	3 Honda Accord; 2 Toyota Camry	
19	Plain	1	1 Toyota Camry	
20	UC	3	2 Dodge Charger	
21	Specialized Vehicles (K9)	0	5 Ford Explorer	
	D. Field Equipment			
22	Shotgun with Tactical Light	60	0	Shotgun with Tactical Lights were determined obsolete equipment/no longer compliant with LAPD standards.
23	Ballistic Shields	0		
24	Shotgun, Beanbag	60	0	Obsolete equipment/no longer compliant with LAPD standards.
25	Bar Code Reader & Computer for Kit Room Inventory	6	6	
26	Crime Scene Tape (Roll)	120	consumable good	Limit placed on quantity was not sufficient or practical over the course of the contract.
27	Car Seat, Baby Carrier (0-6)	3	0	No longer necessary as LAPD officers police on foot.
28	Bolt Cutters	2	0	No longer necessary as LAPD officers police on foot.
29	Gloves (case)	10	consumable good	Limit placed on quantity was not sufficient or practical over the course of the contract.
30	Batteries, Eveready, Alkaline	10		
31	Car Seat Juvenile Booster (6-12)	2	0	No longer necessary as LAPD officers police on foot.
32	Face Masks (Case)	1	consumable good	Limit placed on quantity was not sufficient or practical over the course of the contract.
33	Patrol Rifle/Personal Shotguns Secure Locker	2	0	No longer needed; shotgun & rifles (see itm #22, #24).
34	Admin Supplies	1	various	Limit placed on quantity was not sufficient or practical over the course of the contract.
35	Camera, Digital	53	5	
36	Undercover Officer Tactical Vests	5	5	Raid Jacket
37	Undercover Tactical Web Gear	5	0	
38	Undercover cameras/surveillance/communication	1	0	No longer necessary for the mission.

Los Angeles County Sheriff's Department (LASD) Contract Compliance

The following sections provide information on the LASD's compliance with contract requirements.

LASD Compliance with Personnel and Training Requirements

LASD provided a list of 222 sworn officers' names assigned to Metro. We randomly selected 30 sworn officers' names and requested LASD to provide documentation indicating that law enforcement personnel met the contract requirements.

Observation: LASD was in compliance with the contract requirements related to personnel and training.

According to LASD, 29 of the 30 personnel selected had attended the Metro's Transit Policing Training (TPT) on various training dates from August 14, 2018, to October 30, 2019. One deputy did not complete this training because he has been on administrative leave since December 2015. Exhibit 26 below summarizes the results of our review.

Exhibit 26 Los Angeles Sheriff's Department Compliance with Contract Personnel and Training Requirements			
Contract Requirements	**Compliance**		**Comments**
	Yes	**No**	
1. Each sworn law enforcement officer/supervisor assigned to Metro hold an active California POST (Peace Officer's Certificate).	X		
2. All supervisors and managers must have completed department training equivalent to supervisory and/or advanced POST courses.	X		
3. Only POST certified personnel are authorized to provide law enforcement services.	X		
4. Personnel assigned to the contract completed Metro's Safety Training.	X		
5. Personnel assigned to the contract completed training course in Transit Policing.	X		

LASD Compliance with Billing Requirements

On September 1, 2017, Metro entered into a five-year firm-fixed unit rate contract with LASD for a not-to-exceed amount of $246,270,631. There is no detailed cost breakdown in the contract for the not to exceed amount. On August 24, 2018, Metro approved a Service Level Authorization SH-AD 575 for an estimated total annual cost of $55,396,511 for Year 2 (FY 2019).

Finding 15: The total amount billed and paid for FY 2019 exceeded the estimated contract amount for Year 2.

For FY 2019, the total amount billed and paid was $57,572,094. Thus, the total amount billed and paid for FY 2019 exceeded the approved estimated cost of $55,396,511 by $2,175,583 for Year 2. Exhibit 27 below shows these amounts.

Exhibit 27	
Los Angeles Sheriff's Department Contract Amount and Billing For FY 2019	

	FY2019 (Year 2)
Contract Amount - Estimated	$ 55,396,511
Billing and Payment - Actual	57,572,094
Difference	$ (2,175,583)

Recommendation 15:

   A. **LASD should inform Metro of the amount expected to exceed the estimated cost specified in the contract for each year before incurring the costs.**

   B. **Metro's SSLE Department should continue monitoring LASD's billings, payments and contract amount to ensure that costs do not exceed the annual estimated contract amount.**

Observation: Billing rates were in compliance with Metro's approved rates. Invoices were based on actual services provided and supported by the Service Level and Billing Status Reports.

According to Section 7.0 of the Statement of Work in the contract, the Contractor's monthly invoice shall be calculated as the monthly pro-rata portion of the annual firm fixed rate as specified in the applicable LASD's SH-AD 575 Deployment of Personnel Form.

We reviewed LASD's billing for two invoices (May 2019 and June 2019). The May invoice was for the period May 1, 2019 to May 31, 2019. The June invoice was for the period June 1, 2019 to June 30, 2019. For each of these two invoices, we compared the annual and monthly rates billed to the annual firm fixed rate specified in the Metro approved SH-AD 575. We found that invoices were based on actual services and supported by service level and billing status reports.

LASD Compliance with Reporting Requirements

We requested LASD to provide the reports with the date received showing that LASD submitted the required reports in a timely manner, with adequate information, and in a format that allows Metro to determine the calculation of reported figures.

Finding 16: LASD met 7 of 8 contract requirements for required reports. The reports were submitted in a timely manner, with adequate information, and in a format that allows Metro to determine the calculation of the reported figures.

LASD provided various reports including KPI data and monthly reporting requirements for July 2018 to June 2019. Daily Report, AM Scheduling, PM Scheduling and EM (night shift) Scheduling were also provided for May and June 2019. We reviewed the information provided and found that LASD met 7 out of the 8 contract requirement for required reports. These reports were submitted in a timely manner with adequate information and in a format that allows Metro to determine the calculation of the reported figures.

LASD did not submit a report for the number of cases referred for follow-up investigation and the subsequent disposition. According to LASD, they had requested clarification from Metro on this item but received no response yet. For Law Enforcement Sensitive Reports, this report refers to "after action reports and intelligence briefings" and therefore copies were not provided. We confirmed with the previous Chief of System Security and Law Enforcement that LASD submitted this information as needed.

Exhibit 28 below summarizes the required reports and the results of our review.

	Exhibit 28		
	Los Angeles Sheriff's Department Compliance with Contract		
	Reporting Requirements		
	Required Reports	**Compliance**	**Comments**
1	Weekly schedule for each watch or shift. Must include each employee's name, actual hours worked, assignment and rank.	Yes	Daily schedules for each shift (AM, PM, and EM reports) were submitted to Metro. These reports showed each employee's name, actual hours worked, assignment and rank.
2	Monthly summary of crime activity, citations issued, arrests made.	Yes	
3	Monthly summary of commendations and complaints.	Yes	
4	The number of cases referred for follow-up investigation and the subsequent disposition.	No	Per LASD, they requested clarification from Metro on this

	Exhibit 28 **Los Angeles Sheriff's Department Compliance with Contract** **Reporting Requirements**		
			item, but received no response yet.
5	After-Action Reports following special operations, emphasis details and/or major incidents.	Yes	
6	Annual Community Policing Plan.	Yes	LASD did not submit the Annual Community Policing Plan. However, LASD indicated Metro SSLE Department is working on developing a joint community policing plan.
7	Monthly summary of Problem-Oriented Policing projects.	Yes	
8	Law Enforcement Sensitive Reports (distribution to Metro's CEO, DCEO, COO, Chief of Risk Safety and Asset Management and Chief of System Security and Law Enforcement).	Yes	Confirmed with the previous Chief of System Security and Law Enforcement LASD submitted this information as needed.

Recommendation 16: Metro's SSLE Department should work with LASD to resolve any issues regarding the required reports. Also, Metro should continue monitoring LASD's submission of reports to ensure all the required reports are submitted in a timely manner and with complete information to allow Metro to determine the calculation of the reported figures.

Long Beach Police Department (LBPD) Contract Compliance

The following sections provide information on the LBPD's compliance with contract requirements.

LBPD Compliance with Personnel and Training Requirements

LBPD provided a list of 515 sworn officers' names assigned to Metro. We randomly selected 30 sworn officers' names and requested LBPD to provide documentation indicating that law enforcement personnel met the contract requirements.

Observation: LBPD was in compliance with the contract requirement for personnel and training.

Based on the information provided by LBPD, we found that LBPD was in compliance with the personnel and training requirements. Exhibit 29 below summarizes the results of our review.

Exhibit 29			
Long Beach Police Department Compliance with Contract Personnel and Training Requirements			
Contract Requirements	**Compliance**		**Comments**
	Yes	**No**	
1. Each sworn law enforcement officer/supervisor assigned to Metro hold an active California POST (Peace Officer's Certificate).	X		
2. Command level officers hold an active Management or Executive POST Peace Officer's certificates.	X		The following command level officers hold an active Management POST Peace Officer's certificates: Deputy Chief, Commander, and Lieutenant.
3. Only Post certified personnel are authorized to provide law enforcement services.	X		
4. Personnel assigned to the contract completed their probationary period.	X		
5. Personnel assigned to the contract have a minimum of 18 months of law enforcement experience.	X		

Exhibit 29 Long Beach Police Department Compliance with Contract Personnel and Training Requirements			
Contract Requirements	**Compliance**		**Comments**
	Yes	**No**	
6. Personnel assigned to the contract have no current duty restrictions.	X		
7. Personnel assigned to the contract completed Metro's Safety Training.	X		
8. Personnel assigned to the contract completed training course in Transit Policing.	X		

LBPD Compliance with Billing Requirements

On March 23, 2017, Metro entered into a five-year firm-fixed unit rate contract with LBPD for a not-to-exceed amount of $30,074,628. Exhibit 30 below summarizes the amount estimated for each year.

Exhibit 30 Long Beach Police Department Contract Amount Proposed for Each Contract Year	
	Amount
Year 1	$ 5,459,271
Year 2	5,517,674
Year 3	5,959,087
Year 4	6,316,633
Year 5	6,821,963
Total	$ 30,074,628

Finding 17: The total amount billed and paid for FY 2019 exceeded the estimated cost specified in the contract for Year 2.

For FY 2019, the total amount billed and paid to LBPD was $6,999,269. Thus, the total amount billed and paid for FY 2019 exceeded the estimated cost in the contract of $5,517,674 by $1,481,595 for Year 2. Exhibit 31 on the following page shows these differences.

Exhibit 31 Long Beach Police Department Difference Between Contract Amount and Amount Billed and Paid for FY 2019		
	FY2019 (Year 2)	
Contract Amount - Estimated	$	5,517,674
Billing and Payment - Actual		6,999,269
Difference	$	(1,481,595)

Recommendation 17:

   A. LBPD should inform Metro of the amount expected to exceed the estimated cost specified in the contract for each year before incurring the costs.

   B. Metro's SSLE Department should continue monitoring LBPD's billings, payments and contract amount to ensure that costs do not exceed the annual estimated contract amount.

Finding 18: Invoices were supported by bi-weekly Work Hour Detail Schedules. However, daily summary of assignments for all hours worked and payroll records were not submitted with the invoices.

According to Section 7.0 of the Statement of Work in the contract, the Contractor's monthly invoice shall be based on actual services under the terms of the contract. The billings must be accompanied by supporting documentation, to include but shall not be limited to, daily summary of assignments and hours worked and payroll records.

We reviewed LBPD's billing for two invoices (May 2019 and June 2019). The May invoice was for three pay periods ending April 26, 2019, May 10, 2019 and May 24, 2019 in the amount of $761,544.56. The June invoice was for three pay periods ending June 7, 2019, June 21, 2019, and July 5, 2019 in the amount of $607,916.03. For each of these two invoices, LBPD submitted a Work Hour Detail schedule by pay period. However, daily summary of assignments for all hours worked and payroll records were not submitted with the invoices to support the actual hours worked and paid.

Recommendation 18:

   A. LBPD should submit the daily summary of assignments for all hours worked and payroll records with the invoices to support the actual hours worked and paid.

   B. Metro's SSLE Department should continue monitoring LBPD's billings to ensure all the required supporting documents were submitted with the invoices.

Finding 19: For the two sampled invoices tested, we identified a total amount of $29,313.65 as overbilled and overpaid to LBPD due to differences in the approved billing rates and the rates used to bill Metro.

On July 16, 2018, Metro's Contract Administration Manager sent an email to LBPD for the schedule of approved Maximum Fully Burdened Rate for Fiscal Year 2018-19. This schedule listed the maximum hourly direct labor rate, indirect overhead rate of 25% and administrative overhead rate of 9.6% for each labor category. According to the email, invoices shall be billed based on the actual hourly direct labor rate of each personnel plus the applicable indirect overhead rate and administrative overhead rate. In no instance shall the fully burdened hourly rate for each personnel exceed the maximum fully burdened hourly rate approved for each labor category.

For each of the two invoices (May 2019 and June 2019) that we selected for testing, we compared the hourly rates billed to the list of maximum fully burdened rates that Metro approved on July 16, 2018. We found that that the fully burdened hourly rate that LBPD billed to Metro exceeded the approved maximum fully burdened hourly rate for three labor categories (Lieutenant, Officer, and Sergeant). We identified a total amount of $29,313.65 as overbilled and overpaid to LBPD.

Exhibit 32 on the following page summarizes the labor category with the hourly rate and cost difference.

Exhibit 32
Long Beach Police Department
Labor Categories with Hourly Rate and Cost Differences

Pay Period	Category	Billed Hours (a)	Billed Labor Cost (b)	Overhead Rate 25% (c)	Billed Total Cost (d=b+c)	Calculated Hourly Rate (e=d/a)	Maximum Fully Burdened Rate (f)	Rate Difference (g=e-f)	Overbilled/ Overpaid (g*a)
4/26/2019	Police Lieutenant	76.00	$11,531.94	$2,882.99	$14,414.93	$ 189.67	$ 182.78	$ 6.89	$ 523.65
5/10/2019	Police Lieutenant	69.00	$10,631.08	$2,657.77	$13,288.85	$ 192.59	$ 182.78	$ 9.81	$ 677.03
5/24/2019	Police Lieutenant	132.00	$20,555.56	$5,138.89	$25,694.45	$ 194.65	$ 182.78	$ 11.87	$ 1,567.49
4/26/2019	Police Officer	72.00	$ 7,692.08	$1,923.02	$ 9,615.10	$ 133.54	$ 126.76	$ 6.78	$ 488.38
4/26/2019	Police Officer	96.00	$10,715.26	$2,678.82	$13,394.08	$ 139.52	$ 126.76	$ 12.76	$ 1,225.12
4/26/2019	Police Officer	40.00	$ 5,116.55	$1,279.14	$ 6,395.69	$ 159.89	$ 126.76	$ 33.13	$ 1,325.29
4/26/2019	Police Officer	67.00	$ 6,949.39	$1,737.35	$ 8,686.74	$ 129.65	$ 126.76	$ 2.89	$ 193.82
5/10/2019	Police Officer	142.00	$14,861.61	$3,715.40	$18,577.01	$ 130.82	$ 126.76	$ 4.06	$ 577.09
5/10/2019	Police Officer	69.00	$ 7,460.03	$1,865.01	$ 9,325.04	$ 135.15	$ 126.76	$ 8.39	$ 578.60
5/24/2019	Police Officer	98.00	$10,919.84	$2,729.96	$13,649.80	$ 139.28	$ 126.76	$ 12.52	$ 1,227.32
5/24/2019	Police Officer	74.00	$ 7,916.35	$1,979.09	$ 9,895.44	$ 133.72	$ 126.76	$ 6.96	$ 515.20
4/26/2019	Police Sergeant	60.00	$ 8,310.60	$2,077.65	$10,388.25	$ 173.14	$ 152.01	$ 21.13	$ 1,267.65
5/10/2019	Police Sergeant	68.00	$ 8,923.19	$2,230.80	$11,153.99	$ 164.03	$ 152.01	$ 12.02	$ 817.31
5/24/2019	Police Sergeant	50.00	$ 6,926.20	$1,731.55	$ 8,657.75	$ 173.16	$ 152.01	$ 21.15	$ 1,057.25
							Subtotal - May Invoice		12,041.18
6/7/2019	Police Lieutenant	24.50	$ 5,407.40	$1,351.85	$ 6,759.25	$ 275.89	$ 182.78	$ 93.11	$ 2,281.14
6/21/2019	Police Lieutenant	76.00	$11,457.07	$2,864.27	$14,321.34	$ 188.44	$ 182.78	$ 5.66	$ 430.06
7/5/2019	Police Lieutenant	34.50	$ 5,352.44	$1,338.11	$ 6,690.55	$ 193.93	$ 182.78	$ 11.15	$ 384.64
6/7/2019	Police Officer	121.00	$13,017.99	$3,254.50	$16,272.49	$ 134.48	$ 126.76	$ 7.72	$ 934.53
6/7/2019	Police Officer	20.00	$ 3,452.26	$ 863.07	$ 4,315.33	$ 215.77	$ 126.76	$ 89.01	$ 1,780.13
6/21/2019	Police Officer	60.00	$ 6,998.16	$1,749.54	$ 8,747.70	$ 145.80	$ 126.76	$ 19.04	$ 1,142.10
6/21/2019	Police Officer	118.00	$12,661.28	$3,165.32	$15,826.60	$ 134.12	$ 126.76	$ 7.36	$ 868.92
6/21/2019	Police Officer	30.00	$ 4,337.16	$1,084.29	$ 5,421.45	$ 180.72	$ 126.76	$ 53.96	$ 1,618.65
6/21/2019	Police Officer	42.00	$ 5,312.04	$1,328.01	$ 6,640.05	$ 158.10	$ 126.76	$ 31.34	$ 1,316.13
7/5/2019	Police Officer	54.00	$ 5,890.27	$1,472.57	$ 7,362.84	$ 136.35	$ 126.76	$ 9.59	$ 517.80
7/5/2019	Police Officer	25.00	$ 2,969.90	$ 742.48	$ 3,712.38	$ 148.50	$ 126.76	$ 21.74	$ 543.38
7/5/2019	Police Officer	17.50	$ 2,355.82	$ 588.96	$ 2,944.78	$ 168.27	$ 126.76	$ 41.51	$ 726.48
6/7/2019	Police Sergeant	30.00	$ 4,930.10	$1,232.53	$ 6,162.63	$ 205.42	$ 152.01	$ 53.41	$ 1,602.33
6/21/2019	Police Sergeant	42.00	$ 6,526.32	$1,631.58	$ 8,157.90	$ 194.24	$ 152.01	$ 42.23	$ 1,773.48
7/5/2019	Police Sergeant	24.00	$ 3,221.30	$ 805.33	$ 4,026.63	$ 167.78	$ 152.01	$ 15.77	$ 378.39
7/5/2019	Police Sergeant	25.80	$ 3,916.96	$ 979.24	$ 4,896.20	$ 189.78	$ 152.01	$ 37.77	$ 974.34
							Subtotal - June Invoice		$17,272.47
							Total - May and June Invoices		$ 29,313.65

Recommendation 19:

  A. LBPD should return to Metro the overbilled and overpaid amount of **$29,313.65.**

  B. Metro should review the billing rates for all FY 2019 invoices to determine the extent of overbilling for all of FY 2019.

C. **Metro's SSLE Department should continue to monitor LBPD's billings to ensure only the approved labor classifications are billed and included in the list of maximum fully burdened hourly rates.**

Finding 20: The billing methodology for equipment cost was not in compliance with the contract.

For May 2019 and June 2019 invoices, LBPD billed the costs for supplies and equipment, fleet, and technology services as equipment cost using monthly actuals plus an additional 25% of the actual cost as indirect cost overhead. This methodology was not in compliance with the contract.

According to Section CP-01 of the contract, cost of vehicles, equipment, supplies including uniforms and other items needed by law enforcement personnel in the performance of the Statement of Work should be included in the maximum fully burdened hourly rate as equipment/supplies overhead cost. Equipment/supplies overhead cost shall be computed using an hourly direct labor rate plus indirect overhead cost times equipment/supplies overhead rate. Since LBPD used a different billing methodology than the methodology required by the contract, LBPD billed Metro $55,515.75 less than if the contract method had been used.

Exhibit 33 below summarizes the cost impact using LBPD's billing methodology vs. contract required billing methodology for equipment cost for May 2019 and June 2019 invoices.

Exhibit 33			
Long Beach Police Department			
Cost Impact for Equipment Cost for May 2019 and June 2019			
Description	May 2019	June 2019	Total
Amount billed by LBPD for personnel cost and equipment cost (a)	$ 761,544.56	$ 607,916.03	$ 1,369,460.59
Amount calculated using the contract required methodology (b)	$ 776,851.68	$ 648,124.65	$ 1,424,976.34
Difference (a-b)	$ (15,307.12)	$ (40,208.62)	$ (55,515.75)

Recommendation 20: Metro's SSLE Department should review the billing methodology specified in the contract for equipment cost and determine whether the contract should be amended to use the LBPD method.

LBPD Compliance with Contract Reporting Requirements

We requested LBPD to provide the reports with the date received by Metro showing that LBPD submitted the required reports in a timely manner, with adequate information, and in a format that allows Metro to determine the calculation of reported figures.

Finding 21: LBPD met 6 out of 9 contract requirements for required reports. The reports were submitted in a timely manner, with adequate information, and in a format that allows Metro to determine the calculation of the reported figures.

LBPD provided various reports including monthly summary schedules and daily summary reports for July 2018 to June 2019. We reviewed all the reports provided and found that LBPD met 6 out of the 9 contract requirement for required reports. These reports were submitted in a timely manner, with adequate information, and in a format that allows Metro to determine the calculation of the reported figures.

LBPD did not submit the weekly schedule for each watch or shift because the data can be retrieved from the nightly data dump. According to LBPD, the weekly report was created in FY 2018 as a temporary solution to help Metro staff better understand the data dump. LBPD was advised that the weekly report was no longer needed for FY 2019. We were unable to confirm this change with Metro SSLE because of the change in management and staff.

LBPD also did not submit the after action reports following special operations, emphasis details and/or major incidents because of on-going litigation. For Executive Summary of Major Events/Incidents on the Metro System, this report refers to "after action reports and intelligence briefings" and therefore copies were not provided. We confirmed with the previous Chief of System Security and Law Enforcement that LBPD submitted this information as needed.

Exhibit 34 below summarizes the required reports and the results of our review.

Exhibit 34		
Long Beach Police Department Compliance with Contract Reporting Requirements		
Required Reports	**Compliance**	**Comments**
1	Weekly schedule for each watch or shift. Must include each employee's name, badge number, actual hours worked, assignment and rank.	No	Reports not provided. Per LBPD, they were advised by Metro that the report was no longer needed because it can be retrieved from the nightly data dump.
2	Watch Commander Summary of Major Events of the Day.	Yes	Daily Summary included significant events of the day.
3	Monthly summary of crime activity, citations issued, arrests made.	Yes	
4	Monthly summary of commendations and complaints.	Yes	

Exhibit 34 Long Beach Police Department Compliance with Contract Reporting Requirements		
Required Reports	**Compliance**	**Comments**
5	Monthly Report on the number of Part 1 crime cases referred for follow-up investigation and the subsequent disposition.	Yes	
6	After-Action Reports following special operations, emphasis details and/or major incidents.	No	Reports not provided. Per LBPD, major incident after action reports cannot be provided because of on-going litigation.
7	Annual Community Policing Plan.	Yes	Per LBPD, Metro SSLE Department is working on developing a joint community policing plan.
8	Monthly summary of Problem-Oriented Policing projects.	Yes	
9	Executive Summary of Major Events/Incidents on the Metro System (distribution to Metro's CEO, DCEO, COO, Chief of Risk Safety and Asset Management and Chief of System Security and Law Enforcement).	Yes	This report refers to "after action reports and intelligence briefings". Confirmed with the previous Chief of System Security and Law Enforcement that LBPD submitted the information as needed.

Recommendation 21: Metro's SSLE Department should monitor LBPD's submission of reports to ensure all the required reports are submitted in a timely manner and with complete information to allow Metro to determine the calculation of the reported figures.

F. Fare and Customer Code of Conduct Compliance Enforcement

Enforcing fare compliance on the Metro System, as well as the Metro Customer Code of Conduct is a key element of Metro's safety and security mission. Currently, this mission is primarily the role of Metro Security but is also performed by contracted law enforcement personnel. To review Metro fare and code of conduct compliance enforcement we:

- Determined the number of fare validation checks (report by month, rail line, and compare to target).

- Summarized the total number of citations issued in FY 2018 and compared with the total number of citations issued in prior years.

- Determined whether performance indicators or metrics were developed for Metro's transit security and fare compliance functions.

Customer Code of Conduct and Parking Enforcement and Citations

Exhibit 35 on the following page shows the citations for Metro Customer Code of Conduct violations, including those related to transit fares. As this exhibit 35 shows, the vast majority (99%) of the citations for Metro Customer Code of Conduct violations are issued by Metro Security. This demonstrates the substantial change in the responsibility for fare and customer code of conduct enforcement from contracted law enforcement to Metro Security.

Parking enforcement is also an important function to ensure safety and that vehicles do not interfere with Metro bus and rail operations. Exhibit 36 shows the citations for parking violations issued by Metro Security and each of the contracted law enforcement agencies. As this exhibit shows, Metro Security issued the vast majority of parking citations (98.9%).

Exhibit 35				
Citations for Metro Code of Conduct Violations FY 2019 by Agency				
Code Of Conduct Violation	**Metro Security**	**LA Police**	**LA Sheriff**	**Long Beach Police**	**Totals**
Blocking An Isle Elevator Escalator Etc.	7				7
Board Rear Bus Door To Avoid Payment Of Fare	1				1
Boarding Without Proof Of Payment	3,548	2	1	3	3,554
Bypassing Fare Gates Or Fare Collection Machines	700			3	703
Creating Disruptive Noise	5	1			6
Disturbing Others By Noise	11	1			12
Drinking Alcohol	20	3			23
Duplicate Or Counterfeit Fare Media	1				1
Eating Drinking Smoking	89	6	7		102
Failure To Obey Signs	46		4	1	51
False Representation To Obtain Reduced Fare	83			1	84
Fare Evasion	8,442	9	4	58	8,513
Feet/Shoes On Seats	7				7
Incite Violence / Posing Clear & Present Danger	3				3
Littering	120			1	121
Loitering In Metro Facilities Or Vehicle	3				3
Misuse Of Disc. Fare Media Or Fail To Prove Eligible	129			1	130
Misuse Of Fare Media	348			3	351
Obstructing Or Impeding Flow Of Metro Veh	5				5
Occupying More Than One Seat	205		1	2	208
Playing Sound Device	3				3
Preventing A Door From Closing	1	1			2
Reclining On Placing Objs On Or Blocking Seats	21				21
Refusal To Show Proof Of Payment	14		1		15
Riding Bicycles And Skateboards	24	2	1		27
Sale/Peddling Of Goods/Services	2		2		4
Solicitation	2				2
Spitting	17				17
Urinate Or Defecate Except In A Lavatory	14	1			15

Willfully Blocking Or Impeding Movement Of Persons	5				5
Willfully Interfere With Operation Of Metro Veh	2				2
Totals	13,878	26	21	76	14,001
Percentage by Agency	99.1%	0.2%	0.1%	0.5%	100.0%

Exhibit 36					
Citations for Parking Violations for FY 2019 by Agency					
Parking Violation	**Metro Security**	**LA Police**	**LA Sheriff**	**Un known**	**Totals**
Access Park Spaces Designated For Disabled	16				16
Blocking Street Or Access	2		1		3
Bus Loading Zones	16		4	1	21
Car Share Or Vanpool Authorization Required	6			2	8
Disconnected Trailer	3				3
Double Parking	1				1
Electric Vehicle Parking Spaces	2			1	3
Exceeding Posted Time Limit	4				4
Expired Meter Or Pay Station	7,085			17	7,102
Failure To Obey Signs	52				52
Failure To Obey Signs/Curb Markings	-			1	1
Failure To Properly Display The Permit As Instruct	1				1
Illegal Parking At Assigned / Reserved Spaces	63			12	75
Illegal Parking In A Loading Zone	1				1
Illegal Parking In Red Zones	-	3			3
Illegal Parking Outside A Defined Parking Space	69			3	72
Improperly Parked Bicycles Outside Desig. Area	1				1
No Front Plate	-	2	1		3
Parking In Permit Parking Spaces Without Permit	614			1	615
Permit Penalty Provisions	1				1
Restricted Parking	1				1
Tabs	-	1			1
Transient Daily Or Preferred Monthly Parking Perm	1				1
Unregistered Vehicle	-	41			41
Vehicle Exceeds Load Size Limit	15				15
Vehicle Parked Seventy Two Or More Hours	5				5
Wrong Side Two Way Traffic Or Roadway	1				1
Totals	7,960	47	6	38	8,051
Percentage by Agency	98.9%	0.6%	0.1%	0.5%	100.0%

Exhibit 37 shows the trend in Metro Customer Code of Conduct citations issued over the past six years. As this exhibit shows, the number of Customer Code of Conduct citations issued declined substantially (67%) between FY 2018 and FY 2019. Total citations for FY 2019 are 78% below the level for FY 2013.

Exhibit 37			
Citations for Metro Customer Code of Conduct Violations			
FY 2013 to FY 2019			
Year	Citations Issued	Annual Change	Cumulative Change
FY 2013	100,937		
FY 2014	82,892	-18%	-18%
FY 2015	58,102	-30%	-42%
FY 2016	29,524	-49%	-71%
FY 2017	25,218	-15%	-75%
FY 2018	66,102	162%	-35%
FY 2019	21,964	-67%	-78%
FY 2018 totals include 22,516 formal warnings issued.			
FY 2019 totals include 7,963 formal warnings issued.			

This decrease in citations is likely attributable to a substantial decrease in the level of enforcement of the Metro Customer Code of Conduct including fare evasion, especially by Metro Security. Other potential reasons for this decrease could be changes in ridership or level of fare compliance.

Exhibit 38 shows the trend in parking citation issued over the past six years. As this exhibit shows, the number of parking citations issued increased substantially (476%) between FY 2018 and FY 2019. Total citations for FY 2019 are 12% below the level for FY 2013. The fluctuation in parking citations is likely the result of the transition of responsibility for parking enforcement to Metro Security.

Exhibit 38
Citations for Parking Violations
FY 2013 to FY 2019

Year	Citations Issued	Annual Change	Cumulative Change
FY 2013	9,139		
FY 2014	7,694	-16%	-16%
FY 2015	8,000	4%	4%
FY 2016	8,292	4%	4%
FY 2017	10,652	28%	28%
FY 2018	1,398	-87%	-87%
FY 2019	8,051	476%	-12%

Performance Indicators for Metro Security

Metro Security is responsible for providing security for the Gateway Metro Headquarters Building by deploying armed security officers. Metro Security also provides security at Metro facilities through mobile security units that patrol the various Metro facilities and provide a visible security presence for those facilities, provide operations security and protection of Metro revenue collection personnel and security presence in the Metro cash counting facility and provide security for Metro pressure washer personnel that clean various Metro stations and facilities during the overnight hours. During FY 2019 Metro Security had a total of 181 budgeted positions, of which 152 were filled and 29 were vacant.

The role and responsibilities of Metro Security 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. Given this, it is important that Metro Security have an effective accountability system, including meaningful performance indicators.

Finding 22: The SSLE Department has made no progress in developing performance indicators for Metro Security.

During the FY 2018 Performance Audit the SSLE Department reported they would be developing Key Performance Indicators (KPI) for Metro Security during 2019. These KPIs were to cover two key areas: Fare Enforcement and Critical Infrastructure Protection.

The fare enforcement KPI was to focus on effective strategies to increase fare compliance. The critical infrastructure KPI was to focus on assessing and mitigating security threats to the transit system and its critical structures. The SSLE Department was not able to provide an information or documentation showing progress in developing these performance indicators. The SSLE Department now states these key performance indicators will be developed by August of 2020.

Recommendation 22: Metro's SSLE Department should complete efforts to develop key performance indicators for Metro Security.

Appendix A: Comparison of Reported Crime on Rail Lines, Bus and Union Station

Exhibit 39									
Metro Blue Line									
Comparison of Reported Crime FY 2015 to FY 2019									
Crime	FY 2015	FY 2016	Change	FY 2017	Change	FY 2018	Change	FY 2019	Change	Total Change
Reported Part 1 Violent Crime									
Homicide	1	1	0%	0	-100%	1	0%	0	-100%	-100%
Rape	1	1	0%	0	-100%	3	0%	0	-100%	-100%
Robbery	77	114	48%	109	-4%	59	-46%	47	-20%	-39%
Agg Assault	83	66	-20%	58	-12%	45	-22%	45	0%	-46%
Agg Assault on Op	0	0	0%	0	0%	0	0%	0	0%	0%
Totals	162	182	12%	167	-8%	108	-35%	92	-15%	-43%
Ridership (Millions)	26.4	24.4	-8%	23.7	-3%	21.3	-10%	14.8	-30%	-44%
Per 1 Million Riders	6.13	7.47	22%	7.05	-6%	5.07	-28%	6.2	22%	1%
Per Day	0.44	0.50	12%	0.46	-8%	0.30	-36%	0.25	-15%	-43%
Reported Part 1 Property Crime									
Crime	FY 2015	FY 2016	Change	FY 2017	Change	FY 2018	Change	FY 2019	Change	Total Change
Burglary	0	0	0%	2	0%	7	250%	3	-57%	NA
Larceny-Theft	183	149	-19%	150	1%	128	-15%	98	-23%	-46%
Grand Theft Auto	29	26	-10%	21	-19%	13	-38%	10	-23%	-66%
Arson	3	4	33%	0	-100%	1	0%	0	-100%	-100%
Totals	215	179	-17%	173	-3%	149	-14%	111	-26%	-31%
Ridership (Millions)	26.4	24.4	-8%	23.7	-3%	21.3	-10%	14.8	-30%	-44%
Per 1 Million Riders	8.14	7.34	-10%	7.30	-1%	7.00	-4%	7.5	7%	-14%
Per Day	0.59	0.49	-17%	0.47	-4%	0.41	-13%	0.30	-26%	-31%
Reported Part 2 Crime									
Crime	FY 2015	FY 2016	Change	FY 2017	Change	FY 2018	Change	FY 2019	Change	Total Change

Battery	79	91	15%	85	-7%	96	13%	65	-32%	-18%
Battery on Op	0	0	0%	1	NA	0	-100%	3	NA	NA
Sex Offenses	17	13	-24%	14	8%	9	-36%	9	0%	-47%
Weapons	21	31	48%	34	10%	31	-9%	17	-45%	-19%
Narcotics	113	93	-18%	97	4%	90	-7%	80	-11%	-29%
Trespassing	73	75	3%	20	-73%	14	-30%	15	7%	-79%
Vandalism	44	67	52%	34	-49%	24	-29%	19	-21%	-57%
Totals	347	370	7%	285	-23%	264	-7%	208	-21%	-40%
Ridership (Millions)	26.4	24.4	-8%	23.7	-3%	21.3	-10%	14.8	-30%	-44%
Per 1 Million Riders	13.1	15.2	16%	12.0	-21%	12.4	3%	14.0	13%	7%
Per Day	0.95	1.01	7%	0.78	-23%	0.72	-7%	0.57	-21%	-40%

Exhibit 40										
Metro Green Line										
Comparison of Reported Crime FY 2015 to FY 2019										
Crime	FY 2015	FY 2016	Change	FY 2017	Change	FY 2018	Change	FY 2019	Change	Total Change
Reported Part 1 Violent Crime										
Homicide	0	0	NA	2	NA	0	0%	0	NA	NA
Rape	1	1	0%	2	100%	3	0%	1	-67%	0%
Robbery	85	95	12%	82	-14%	51	-38%	32	-37%	-62%
Agg Assault	16	31	94%	33	6%	12	-64%	15	25%	-6%
Agg Assault on Op	0	0	0%	0	0%	0	0%	0	0%	0%
Totals	102	127	25%	119	-6%	66	-45%	48	-27%	-53%
Ridership (Millions)	12.4	11.7	-6%	10.3	-12%	9.6	-7%	9.4	-2%	-24%
Per 1 Million Riders	8.22	10.85	32%	11.55	6%	6.88	-40%	6.88	0%	-16%
Per Day	0.28	0.35	25%	0.33	-5%	0.18	-45%	0.18	0%	-35%
Reported Part 1 Property Crime										
Crime	FY 2015	FY 2016	Change	FY 2017	Change	FY 2018	Change	FY 2019	Change	Total Change
Burglary	0	1	0	1	0%	2	100%	1	-50%	NA
Larceny-Theft	160	144	-10%	97	-33%	51	-47%	48	-6%	-70%

Grand Theft Auto	66	55	-17%	41	-25%	11	-73%	9	-18%	-86%
Arson	0	1	NA	0	-100%	1	NA	0	-100%	NA
Totals	226	201	-11%	139	-31%	65	-53%	58	-11%	-74%
Ridership (Millions)	12.4	11.7	-6%	10.3	-12%	9.6	-7%	9.4	-2%	-24%
Per 1 Million Riders	18.20	17.18	-6%	13.50	-21%	6.77	-50%	6.18	-9%	-66%
Per Day	0.62	0.55	-11%	0.38	-31%	0.18	-53%	0.16	-11%	-74%
Reported Part 2 Crime										
Crime	FY 2015	FY 2016	Change	FY 2017	Change	FY 2018	Change	FY 2019	Change	Total Change
Battery	45	35	-22%	27	-23%	29	7%	39	34%	-13%
Battery on Op	0	0	0%	0	NA	0	NA	0	0%	0%
Sex Offenses	6	5	-17%	5	0%	4	-20%	12	200%	100%
Weapons	11	3	-73%	8	167%	11	38%	11	0%	0%
Narcotics	53	25	-53%	26	4%	21	-19%	45	114%	-15%
Trespassing	19	9	-53%	3	-67%	1	-67%	7	600%	-63%
Vandalism	44	31	-30%	31	0%	17	-45%	13	-24%	-70%
Totals	178	108	-39%	100	-7%	83	-17%	127	53%	-29%
Ridership (Millions)	12.4	11.7	-6%	10.3	-12%	9.6	-7%	9.4	-2%	-24%
Per 1 Million Riders	14.3	9.2	-36%	9.7	5%	8.65	-11%	8.6	0%	-40%
Per Day	0.49	0.30	-39%	0.27	-9%	0.23	-16%	0.23	0%	-53%
Source: Analysis of crime reported by LASD for FYs 2015 to 2017, and reported by LAPD, LASD, and LBPD for FY's 2018 and 2019										

Exhibit 41										
Metro Expo Line										
Comparison of Reported Crime FY 2015 to FY 2019										
Crime	FY 2015	FY 2016	Change	FY 2017	Change	FY 2018	Change	FY 2019	Change	Total Change
Reported Part 1 Violent Crime										
Homicide	0	0	NA	0	NA	0	0%	0	0%	0%

Rape	0	0	NA	0	NA	0	0%	5	0%	0%
Robbery	28	28	0%	57	104%	46	-19%	41	-11%	46%
Agg Assault	16	14	-13%	21	50%	20	-5%	23	15%	44%
Agg Assault on Op	0	0	0%	0	0%	0	0%	0	0%	0%
Totals	44	42	-5%	78	86%	66	-15%	69	5%	57%
Ridership (Millions)	9.9	10.7	8%	17.1	60%	19.2	12%	19.4	1%	95%
Per 1 Million Riders	4.43	3.93	-11%	4.56	16%	3.44	-25%	3.56	3%	-20%
Per Day	0.12	0.12	-5%	0.21	83%	0.18	-14%	0.19	5%	57%

Reported Part 1 Property Crime										
Crime	FY 2015	FY 2016	Change	FY 2017	Change	FY 2018	Change	FY 2019	Change	Total Change
Burglary	0	0	0	1	0%	0	-100%	2	NA	NA
Larceny-Theft	131	68	-48%	146	115%	164	12%	163	-1%	24%
Grand Theft Auto	6	8	33%	1	-88%	0	-100%	0	NA	NA
Arson	0	0	NA	0	NA	0	NA	0	NA	NA
Totals	137	76	-45%	148	95%	164	11%	165	1%	20%
Ridership (Millions)	9.9	10.7	8%	17.1	60%	19.2	12%	19.4	1%	95%
Per 1 Million Riders	13.81	7.10	-49%	8.65	22%	8.54	-1%	8.51	0%	-38%
Per Day	0.38	0.21	-45%	0.41	97%	0.45	10%	0.45	1%	20%

Reported Part 2 Crime										
Crime	FY 2015	FY 2016	Change	FY 2017	Change	FY 2018	Change	FY 2019	Change	Total Change
Battery	16	14	-13%	32	129%	47	47%	90	91%	463%
Battery on Op	0	0	0%	0	NA	1	NA	0	-100%	NA
Sex Offenses	0	5	NA	11	120%	9	-18%	15	67%	NA
Weapons	7	1	-86%	1	0%	2	100%	3	50%	-57%
Narcotics	16	7	-56%	9	29%	4	-56%	2	-50%	-88%
Trespassing	7	4	-43%	2	-50%	2	0%	2	0%	-71%
Vandalism	29	12	-59%	14	17%	3	-79%	13	333%	-55%
Totals	75	43	-43%	69	60%	68	-1%	125	84%	67%
Ridership (Millions)	9.9	10.7	8%	17.1	60%	19.2	12%	19.4	1%	95%
Per 1 Million Riders	7.6	4.0	-47%	4.04	1%	3.5	-12%	6.4	82%	-15%

| Per Day | 0.21 | 0.12 | -43% | 0.19 | 61% | 0.19 | -2% | 0.34 | 84% | 67% |

Source: Analysis of crime reported by LASD for FYs 2015 to 2017, and reported by LAPD, LASD, and LBPD for FY's 2018 and 2019

Exhibit 42										
Metro Red Line										
Comparison of Reported Crime FY 2015 to FY 2019										
Crime	**FY 2015**	**FY 2016**	**Change**	**FY 2017**	**Change**	**FY 2018**	**Change**	**FY 2019**	**Change**	**Total Change**
Reported Part 1 Violent Crime										
Homicide	0	0	NA	1	NA	0	0%	0	NA	NA
Rape	0	2	NA	3	50%	2	0%	3	50%	NA
Robbery	43	52	21%	46	-12%	55	20%	61	11%	42%
Agg Assault	76	51	-33%	57	12%	30	-47%	74	147%	-3%
Agg Assault on Op	0	0	0%	0	0%	0	0%	1	NA	NA
Totals	119	105	-12%	107	2%	87	-19%	139	60%	17%
Ridership (Millions)	47.7	46.0	-4%	45.6	-1%	43.8	-4%	43.07	-2%	-10%
Per 1 Million Riders	2.49	2.28	-8%	2.35	3%	1.99	-15%	3.23	62%	29%
Per Day	0.33	0.29	-12%	0.29	1%	0.24	-18%	0.38	60%	17%
Reported Part 1 Property Crime										
Crime	**FY 2015**	**FY 2016**	**Change**	**FY 2017**	**Change**	**FY 2018**	**Change**	**FY 2019**	**Change**	**Total Change**
Burglary	2	1	0	3	0%	0	-100%	0	0%	0%
Larceny-Theft	133	120	-10%	98	-18%	160	63%	210	31%	58%
Grand Theft Auto	5	10	100%	7	-30%	13	86%	0	-100%	-100%
Arson	0	0	NA	2	NA	0	-100%	0	NA	NA
Totals	140	131	-6%	110	-16%	173	57%	210	21%	50%
Ridership (Millions)	47.7	46.0	-4%	45.6	-1%	43.8	-4%	43.07	-2%	-10%
Per 1 Million Riders	2.93	2.85	-3%	2.41	-15%	3.95	64%	4.88	23%	66%

Per Day	0.38	0.36	-6%	0.30	-16%	0.47	58%	0.58	21%	50%

Reported Part 2 Crime										
Crime	FY 2015	FY 2016	Change	FY 2017	Change	FY 2018	Change	FY 2019	Change	Total Change
Battery	105	98	-7%	112	14%	188	68%	205	9%	95%
Battery on Op	0	0	0%	0	NA	0	NA	3	NA	NA
Sex Offenses	25	23	-8%	27	17%	38	41%	24	-37%	-4%
Weapons	15	7	-53%	11	57%	0	-100%	0	0%	-100%
Narcotics	120	66	-45%	75	14%	0	-100%	0	0%	-100%
Trespassing	35	34	-3%	31	-9%	24	-23%	30	25%	-14%
Vandalism	30	30	0%	22	-27%	22	0%	16	-27%	-47%
Totals	330	258	-22%	278	8%	272	-2%	278	2%	-16%
Ridership (Millions)	47.7	46.0	-4%	45.6	-1%	43.8	-4%	43.07	-2%	-10%
Per 1 Million Riders	6.92	5.61	-19%	6.10	9%	6.21	2%	6.45	4%	-7%
Per Day	0.90	0.71	-22%	0.76	8%	0.75	-2%	0.76	2%	-16%
Source: Analysis of crime reported by LASD for FYs 2015 to 2017, and reported by LAPD, LASD, and LBPD for FY's 2018 and 2019										

Exhibit 43									
Metro Gold Line									
Comparison of Reported Crime FY 2015 to FY 2019									
Crime	**FY 2015**	**FY 2016**	**Change**	**FY 2017**	**Change**	**FY 2018**	**Change**	**FY 2019**	**Change**	**Total Change**
Reported Part 1 Violent Crime									
Homicide	0	1	NA	0	-100%	0	0%	1	0%	NA
Rape	0	1	NA	0	-100%	1	0%	1	0%	NA
Robbery	14	14	0%	13	-7%	15	15%	11	-27%	-21%
Agg Assault	19	15	-21%	15	0%	9	-40%	16	78%	-16%
Agg Assault on Op	0	0	0%	0	0%	0	0%	0	0%	0%
Totals	33	31	-6%	28	-10%	25	-11%	29	16%	-12%
Ridership (Millions)	14.0	15.4	10%	16.6	8%	16.2	-2%	16.0	-1%	14%
Per 1 Million Riders	2.35	2.01	-14%	1.69	-16%	1.54	-9%	1.8	17%	-23%
Per Day	0.09	0.08	-6%	0.08	-6%	0.07	-14%	0.08	16%	-12%
Reported Part 1 Property Crime									
Crime	**FY 2015**	**FY 2016**	**Change**	**FY 2017**	**Change**	**FY 2018**	**Change**	**FY 2019**	**Change**	**Total Change**
Burglary	3	1	0	2	0%	0	-100%	1	NA	-67%
Larceny-Theft	85	94	11%	56	-40%	54	-4%	55	2%	-35%
Grand Theft Auto	11	14	27%	16	14%	9	-44%	10	11%	-9%
Arson	0	0	NA	1	NA	0	-100%	1	NA	NA
Totals	99	109	10%	75	-31%	63	-16%	67	6%	-32%
Ridership (Millions)	14.0	15.4	10%	16.6	8%	16.2	-2%	16.0	-1%	14%
Per 1 Million Riders	7.06	7.08	0%	4.52	-36%	3.89	-14%	4.2	7%	-41%
Per Day	0.27	0.30	10%	0.21	-30%	0.17	-18%	0.18	6%	-32%
Reported Part 2 Crime									
Crime	**FY 2015**	**FY 2016**	**Change**	**FY 2017**	**Change**	**FY 2018**	**Change**	**FY 2019**	**Change**	**Total Change**
Battery	26	30	15%	19	-37%	47	147%	34	-28%	31%
Battery on Op	0	0	0%	0	NA	0	NA	0	NA	NA
Sex Offenses	7	6	-14%	16	167%	11	-31%	4	-64%	-43%
Weapons	13	2	-85%	3	50%	1	-67%	2	100%	-85%

Narcotics	38	18	-53%	19	6%	4	-79%	8	100%	-79%
Trespassing	4	50	1150%	9	-82%	3	-67%	1	-67%	-75%
Vandalism	36	49	36%	42	-14%	21	-50%	13	-38%	-64%
Totals	124	155	25%	108	-30%	87	-19%	62	-29%	-50%
Ridership (Millions)	14.0	15.4	10%	16.6	8%	16.2	-2%	16.0	-1%	14%
Per 1 Million Riders	8.84	10.06	14%	6.51	-35%	5.37	-18%	3.9	-28%	-56%
Per Day	0.34	0.42	25%	0.30	-29%	0.24	-21%	0.17	-29%	-50%
Source: Analysis of crime reported by LASD for FYs 2015 to 2017, and reported by LAPD, LASD, and LBPD for FY's 2018 and 2019										

Exhibit 44									
Metro Bus Lines									
Comparison of Reported Crime FY 2015 to FY 2019									
Crime	**FY 2015**	**FY 2016**	**Change**	**FY 2017**	**Change**	**FY 2018**	**Change**	**FY 2019**	**Change**	**Total Change**
Reported Part 1 Violent Crime									
Homicide	0	1	0%	0	-100%	0	0%	0	0%	0%
Rape	1	4	300%	0	-100%	5	0%	0	0%	400%
Robbery	127	97	-24%	96	-1%	167	74%	121	-28%	31%
Agg Assault	143	139	-3%	107	-23%	94	-12%	108	15%	-34%
Agg Assault on Op	30	18	-40%	20	0%	6	0%	15	0%	0%
Totals	301	259	-14%	223	-14%	272	22%	244	-10%	-10%
Ridership (Millions)	334.8	320.7	-4%	276.7	-14%	280.8	1%	273.8	-3%	-16%
Per 1 Million Riders	0.90	0.81	-10%	0.81	0%	0.97	20%	0.89	-8%	8%
Per Day	0.82	0.71	-14%	0.61	-14%	0.75	22%	0.67	-10%	-10%
Reported Part 1 Property Crime									
Crime	**FY 2015**	**FY 2016**	**Change**	**FY 2017**	**Change**	**FY 2018**	**Change**	**FY 2019**	**Change**	**Total Change**
Burglary	6	4	-33%	4	0%	2	-50%	2	0%	-67%
Larceny-Theft	293	319	9%	293	-8%	315	8%	293	-7%	8%
Grand Theft Auto	19	14	-26%	13	-7%	21	62%	2	-90%	11%
Arson	0	2	NA	1	-50%	0	-100%	0	#DIV/0!	NA
Totals	318	339	7%	252	-26%	338	34%	297	-12%	6%
Ridership (Millions)	334.8	320.7	-4%	276.7	-14%	280.8	1%	273.8	-3%	-16%
Per 1 Million Riders	0.95	1.06	11%	0.91	-14%	1.20	32%	1.08	-10%	27%
Per Day	0.87	0.93	7%	0.69	-26%	0.93	34%	0.81	-12%	6%
Reported Part 2 Crime									
Crime	**FY 2015**	**FY 2016**	**Change**	**FY 2017**	**Change**	**FY 2018**	**Change**	**FY 2019**	**Change**	**Total Change**
Battery	142	225	58%	189	-16%	323	71%	281	-13%	127%
Battery on Op	63	114	0%	83	NA	73	-12%	77	5%	NA
Sex Offenses	29	65	124%	46	-29%	75	63%	44	-41%	159%
Weapons	25	29	16%	19	-34%	5	-74%	10	100%	-80%

Narcotics	126	73	-42%	79	8%	19	-76%	52	174%	-85%
Trespassing	10	23	130%	6	-74%	6	0%	7	17%	-40%
Vandalism	134	179	34%	144	-20%	63	-56%	65	3%	-53%
Totals	529	708	34%	566	-20%	564	0%	536	-5%	7%
Ridership (Millions)	334.8	320.7	-4%	276.7	-14%	280.8	1%	280.8	0%	-16%
Per 1 Million Riders	1.58	2.21	40%	2.05	-7%	2.01	-2%	2.01	0%	27%
Per Day	1.45	1.94	34%	1.55	-20%	1.55	0%	1.55	0%	7%

Source: Analysis of crime reported by LASD for FYs 2015 to 2017, and reported by LAPD, LASD, and LBPD for FY's 2018 and 2019

Exhibit 45									
Union Station									
Comparison of Reported Crime FY 2015 to FY 2019									
Crime	**FY 2015**	**FY 2016**	**Change**	**FY 2017**	**Change**	**FY 2018**	**Change**	**FY 2019**	**Change**	**Total Change**
Reported Part 1 Violent Crime									
Homicide	0	0	0%	0	0%	0	NA	0	NA	NA
Rape	0	2	0%	0	-100%	2	NA	0	NA	NA
Robbery	1	4	300%	1	-75%	0	-100%	7	NA	600%
Agg Assault	17	6	-65%	17	183%	9	-47%	19	111%	12%
Agg Assault on Op	0	0	0%	0	0%	0	NA	0	NA	NA
Totals	18	12	-33%	18	50%	11	-39%	26	136%	44%
Ridership (Millions)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Per 1 Million Riders	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Per Day	0.05	0.03	-33%	0.05	50%	0.03	-39%	0.07	136%	44%
Reported Part 1 Property Crime									
Crime	**FY 2015**	**FY 2016**	**Change**	**FY 2017**	**Change**	**FY 2018**	**Change**	**FY 2019**	**Change**	**Total Change**
Burglary	5	5	0%	5	0%	0	-100%	2	#DIV/0!	-60%
Larceny-Theft	42	27	-36%	42	56%	55	31%	77	40%	83%
Grand Theft Auto	2	1	-50%	2	100%	4	100%	0	-100%	-100%
Arson	0	1	NA	0	-100%	0	NA	0	NA	0%
Totals	49	34	-31%	49	44%	59	20%	79	34%	61%
Ridership (Millions)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Per 1 Million Riders	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Per Day	0.13	0.09	-31%	0.13	44%	0.16	20%	0.22	34%	61%
Reported Part 2 Crime									
Crime	**FY 2015**	**FY 2016**	**Change**	**FY 2017**	**Change**	**FY 2018**	**Change**	**FY 2019**	**Change**	**Total Change**
Battery	37	19	-49%	37	95%	36	-3%	58	61%	57%
Battery on Op	0	0	0%	0	0%	0	0.0	0	0%	0%
Sex Offenses	4	3	-25%	4	33%	5	25%	9	80%	125%
Weapons	7	1	-86%	7	600%	0	-100%	0	NA	-100%

Narcotics	36	10	-72%	36	260%	0	-100%	0	NA	-100%
Trespassing	12	2	-83%	12	500%	9	-25%	13	44%	8%
Vandalism	4	7	75%	4	-43%	4	0%	16	300%	300%
Totals	100	42	-58%	100	138%	54	-46%	96	78%	57%
Ridership (Millions)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Per 1 Million Riders	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Per Day	0.27	0.12	-58%	0.27	138%	0.15	-46%	0.26	78%	57%
Source: Analysis of crime reported by LASD for FYs 2015 to 2017, and reported by LAPD, LASD, and LBPD for FY's 2018 and 2019										

Appendix B: Schedule of
Recommendations and Proposed Actions

Exhibit 46					
Metro Security Performance Audit – FY 2019					
Recommendation Summary and Proposed Actions					
No.	**Recommendation**	**Staff Assigned**	**Agree or Disagree**	**Proposed Action**	**Completion Date Estimate**
1	The Metro SSLE Department should a) Significantly strengthen ongoing monitoring and oversight of compliance with the terms of the law enforcement services contracts, b) Review billings and payments for all twelve months of FY 2019 since this audit focused on only two months, c) Formally amend the terms of the contracts if needed.				
2	The Metro SSLE Department should develop an effective approach to monitoring and overseeing contracted law enforcement resources to ensure the resources Metro is paying for are actually present and providing services. This should be accomplished using the smartphones issued to contract law enforcement personnel and an app that uses these smartphones' location based services capabilities and a policy defining and requiring the use of the smartphones.				
3	The Metro SSLE Department should work with contract and other law enforcement agencies to improve the complete and accurate reporting of crime that occurs on the Metro System.				

No.	Recommendation	Staff Assigned	Agree or Disagree	Proposed Action	Completion Date Estimate
4	The Metro SSLE Department should provide more detailed information on reported crime to distinguish between violent crime and property and petty crime.				
5	The Metro SSLE Department should collect and report response time information for all three categories of calls for service.				
6	The Metro SSLE Department should use the Metro issued smartphones location based services capability and data generated to provide reliable and meaningful information on the amount of time contracted law enforcement officers spend on various parts of the Metro System.				
7	The Metro SSLE Department should work with the contract law enforcement agencies to review, revise and adopt Key Performance Indicators (KPI) including baseline or target levels of performance for each KPI.				
8	The Metro SSLE Department should establish the Metro Community Policing plan and ensure it includes: a) Specific training in Problem Oriented Policing for law enforcement personnel to assist Metro in addressing matters related to crime and disorder b) Attendance at community meetings and other events designed to foster Metro's relationship with the community c) Protocols to obtain feedback from bus and rail managers that will be used in the overall policing strategy				

No.	Recommendation	Staff Assigned	Agree or Disagree	Proposed Action	Completion Date Estimate
9	Metro's SSLE Department should continue monitoring the contract requirements for qualifications and training of personnel to ensure compliance.				
10	A. LAPD should inform Metro of the amount expected to exceed the estimated cost specified in the contract for each year before incurring the costs. B. Metro's SSLE Department should continue monitoring LAPD's billings, payments and contract amount to ensure that costs do not exceed the annual estimated contract amount. C. Metro's SSLE Department should determine if it will be necessary to seek contract award adjustment approval from the Board if at Year 5, they have not recovered excess expenditures.				
11	A. As required by the contract, LAPD should submit the list of maximum fully burdened hourly rates for all labor classifications in accordance with the contract requirements. For any additional labor classifications not identified in the lists of maximum fully burdened hourly rate for full time (straight time) personnel and overtime personnel, LAPD should submit the revised lists to Metro for approval prior to incurring and billing the cost. B. Metro's SSLE Department should continue to monitor LAPD's billings to ensure only the approved labor classifications are billed and included in the lists of maximum fully burdened hourly rates for full time (straight time) personnel and overtime				

No.	Recommendation	Staff Assigned	Agree or Disagree	Proposed Action	Completion Date Estimate
	personnel. Metro should also review the billing rates for all invoices to determine the extent of overbillings.				
12	Metro should review LAPD's billings and ensure that only actual hours worked are billed in compliance with the contract.				
13	a) LAPD should return the overbilled and overpaid amount of $789.88 to Metro. b) Metro's SSLE Department should continue monitoring LAPD's billings to identify and resolve billing discrepancies. c) Metro's SSLE Department should work with LAPD to review all invoices for FY 2019 for billings exceeding the allowable rates by classification.				
14	Metro's SSLE Department should monitor LAPD's submission of reports to ensure all the required reports are submitted in a timely manner and with complete information to allow Metro to determine the calculation of the reported figures.				
15	A. LASD should inform Metro of the amount expected to exceed the estimated cost specified in the contract for each year before incurring the costs. B. Metro's SSLE Department should continue monitoring LASD's billings, payments and contract amount to ensure that costs do not exceed the annual estimated contract amount.				
16	Metro's SSLE Department should work with LASD to resolve any				

No.	Recommendation	Staff Assigned	Agree or Disagree	Proposed Action	Completion Date Estimate
	issues regarding the required reports. Also, Metro should continue monitoring LASD's submission of reports to ensure all the required reports were submitted in a timely manner and with complete information to allow Metro to determine the calculation of the reported figures.				
17	A. LBPD should inform Metro of the amount expected to exceed the estimated cost specified in the contract for each year before incurring the costs. B. Metro's SSLE Department should continue monitoring LBPD's billings, payments and contract amount to ensure that costs do not exceed the annual estimated contract amount.				
18	A. LBPD should submit the daily summary of assignments for all hours worked and payroll records with the invoices. B. Metro's SSLE Department should continue monitoring LBPD's billings to ensure all the required supporting documents were submitted with the invoices.				
19	A. LBPD should return to Metro the overbilled and overpaid amount of $29,313.65. B. Metro should review the billing rates for all FY2019 invoices to determine the extent of overbilling for all of FY2019. C. Metro's SSLE Department should continue to monitor LBPD's billings to ensure only the approved labor classifications are billed and included in the list of maximum fully burdened hourly rates.				

No.	Recommendation	Staff Assigned	Agree or Disagree	Proposed Action	Completion Date Estimate
20	Metro's SSLE Department should review the billing methodology specified in the contract for equipment cost and determine whether the contract should be amended to use the LBPD method.				
21	Metro's SSLE Department should monitor LBPD's submission of reports to ensure all the required reports are submitted in a timely manner and with complete information to allow Metro to determine the calculation of the reported figures.				
22	Metro's SSLE Department should complete efforts to develop key performance indicators for Metro Security.				