




Metro

Interoffice Memo

Date	December 16, 2022
To	Karen Gorman, Inspector General Office of the Inspector General
From	Gina Osborn, Chief Safety Officer System Security and Law Enforcement 
Subject	SSLE Responses to Draft Report – Metro Transit Security Performance Audit for FY 2021 and 2022 (Report No. 23-AUD-03), dated November 9, 2022

The purpose of this memorandum is to acknowledge the review of, and corrective actions taken to address, each of the fourteen (14) recommendations outlined in the attached table.

The recommendations were provided to System Security and Law Enforcement on November 9th, 2022. The original recommendations can be found in the “Metro Transit Security Performance Audit for Fiscal Years 2021 and 2022 (Report No. 23-AUD-03)” document on page 88. Note that recommendations highlighted in blue are currently being addressed by SSLE and contracted law enforcement agencies.

The SSLE Compliance Group continues to be fully committed to ensuring that LACMTA is receiving contracted transit law enforcement and security services in accordance with contract stipulations.

If you have any questions, please contact me at 213-922-3055 or at OsbornG@metro.net.

Enclosure:

- Metro OIG, Metro Transit Security Performance Audit Fiscal Years 2021 and 2022, dated November 2022, DRAFT REPORT
- OIG-BCA Recommendations and Proposed Actions – SSLE Responses 12.15.2022

Recommendations and Proposed Actions (SSLE Responses)

No.	Report Number	Report Date	Audit Entity	Title	Staff Assigned	Rec No	Recommendation	Agree or Disagree	Completion Date Estimate	Response
1	23-AUD-03	11/9/2022	OIG/BCA	Metro Transit Security Performance Audit for Fiscal Years 2021 and 2022	Systems Security and Law Enforcement Compliance Group	1	The Metro SSLE Department should work with contract law enforcement agencies to develop specific targets for the level of visible presence and activity provided by contract law enforcement personnel on the Metro System as part of an overall policing strategy and plan.	Agree	7/1/2023	SSLE will incorporate verbiage related to targets for visibility and service levels in the new law enforcement contracts in FY24.
2	23-AUD-03	11/9/2022	OIG/BCA	Metro Transit Security Performance Audit for Fiscal Years 2021 and 2022	Systems Security and Law Enforcement Compliance Group	2	The Metro SSLE Department should develop an approach to providing a visible security presence on the Metro Bus System as part of an overall policing strategy and plan.	Agree	Ongoing	In collaboration with law enforcement agencies, SSLE is deploying teams of Transit Security Officers (TSO) and law enforcement to ride the buses in support of bus operator assaults.
3	23-AUD-03	11/9/2022	OIG/BCA	Metro Transit Security Performance Audit for Fiscal Years 2021 and 2022	Systems Security and Law Enforcement Compliance Group	3	The Metro SSLE Department should continue to refine its approach to monitoring contracted law enforcement resources to ensure the resources Metro is paying for are actually present and providing services, including the enhanced use of TAP information and potentially using information from GPS enabled body cameras and patrol units.	Agree	Ongoing	SSLE will continue to refine its approach by reestablishing field reviews of Metro resources.
4	23-AUD-03	11/9/2022	OIG/BCA	Metro Transit Security Performance Audit for Fiscal Years 2021 and 2022	Systems Security and Law Enforcement Compliance Group	4	LAPD should continue to deploy contracted law enforcement personnel to maximize their visible presence on the System, while providing an effective response to incidents and calls for service using both contracted law enforcement resources and regular neighborhood patrol units.	Agree	Ongoing	SSLE will notify LAPD of this recommendation, and, although Metro does not reimburse for neighborhood patrol units to respond to SSLE's calls for service, SSLE will make the request.
5	23-AUD-03	11/9/2022	OIG/BCA	Metro Transit Security Performance Audit for Fiscal Years 2021 and 2022	Systems Security and Law Enforcement Compliance Group	5	The Metro SSLE Department and LASD should work with local law enforcement agencies within the LASD service area to expand their responses to incidents and calls for service on the Metro System to allow LASD to increase their ability for contracted LASD law enforcement personnel to provide more visible presence on the Metro System.	Agree	Ongoing	With regards to this recommendation, LASD is beginning to incorporate local law enforcement teams via the Commuter Enhancement Teams (CETs). LASD describes CETs as "a reimagined concept of transit policing...The CET will be staffed with deputies who "commute" with transit riders, sharing a strong emphasis on friendly engagement with the commuter community and helping break down stereotypical barriers of engaging with law enforcement."

No.	Report Number	Report Date	Audit Entity	Title	Staff Assigned	Rec No	Recommendation	Agree or Disagree	Completion Date Estimate	Response
6	23-AUD-03	11/9/2022	OIG/BCA	Metro Transit Security Performance Audit for Fiscal Years 2021 and 2022	Systems Security and Law Enforcement Compliance Group	6	LBPDP should continue to deploy contracted law enforcement personnel to maximize their visible presence on the System, while providing an effective response to incidents and calls for service on the part of the System LBPDP is responsible for policing.	Agree	Ongoing	LBPDP continues to deploy personnel to areas of responsibilities per contract.
7	23-AUD-03	11/9/2022	OIG/BCA	Metro Transit Security Performance Audit for Fiscal Years 2021 and 2022	Systems Security and Law Enforcement Compliance Group	7	Future contracts with the law enforcement agencies should make a provision that annual documented review of the agency's use of force policy be given to officers assigned to LA Metro patrol. Since these shifts are generally overtime shifts and assignments vary on a day-to-day basis, this recommendation would require each agency to ensure all officers receive this annual training. Metro Security should formally adopt its draft Use of Force Policy including a requirement addressing annual retraining on the policy.	Agree	7/1/2023	SSLE will open this discussion with future awarded law enforcement contractors.
8	23-AUD-03	11/9/2022	OIG/BCA	Metro Transit Security Performance Audit for Fiscal Years 2021 and 2022	Systems Security and Law Enforcement Compliance Group	8	An annual analysis of all uses of force activities, policies and practice should be conducted and posted for public review. The analysis shall identify the date and time of incidents, types of encounters resulting in use of force, trends or patterns related to race, age and gender of subjects involved, trends or patterns resulting in injury to any person including employees, and impact of findings on policies, practices, equipment, and training. A review of incidents of force may reveal patterns or trends that could indicate training needs, equipment upgrades, and/or policy modifications. The process of collecting and reviewing the reports is also critical to this analysis.	Agree	7/1/2023	SSLE will open this discussion with future awarded law enforcement contractors.
9	23-AUD-03	11/9/2022	OIG/BCA	Metro Transit Security Performance Audit for Fiscal Years 2021 and 2022	Systems Security and Law Enforcement Compliance Group	9	Metro Security should consider developing and adopting a formal citizen complaint policy and procedures.	Agree	7/1/2023	SSLE will open this discussion with future awarded law enforcement contractors to formalize the citizen complaint process (CCATS, LESSR, Transit Watch). Management will continue to utilize the Agency's Customer Care Department to intake complaints and respond to the public, but will review our SSLE departmental tracking system to ensure we are effectively, timely, and thoroughly responding to the Customer Care Department.
10	23-AUD-03	11/9/2022	OIG/BCA	Metro Transit Security Performance Audit for Fiscal Years 2021 and 2022	Systems Security and Law Enforcement Compliance Group	10	SSLE, in coordination with Metro Operations and Customer Care, should develop a comprehensive plan for the coordinated deployment of contracted law enforcement, Metro Security and Transit Ambassador personnel throughout the Metro System. This plan should include clearly defined roles and responsibilities, clear lines and mechanisms for communication, training, and strong supervision and oversight.	Agree	Ongoing	SSLE will continue to deploy TSOs, law enforcement, and contracted security across the system in support of Metro operations and customer experience.
11	23-AUD-03	11/9/2022	OIG/BCA	Metro Transit Security Performance Audit for Fiscal Years 2021 and 2022	Systems Security and Law Enforcement Compliance Group	11	Metro contracted law enforcement agencies should continue to use information on crime trends and locations, as well as complaints from Metro employees and patrons, to focus their law enforcement personnel and activities.	Agree	Ongoing	Contract law enforcement agencies continue to utilize crime trends and data to deploy teams on buses and rails to address key issues. Customer complaints and concerns received via Transit Watch and CCATS continue to be reviewed and sent to the appropriate law enforcement agency for them to resolve and record.
12	23-AUD-03	11/9/2022	OIG/BCA	Metro Transit Security Performance Audit for Fiscal Years 2021 and 2022	Systems Security and Law Enforcement Compliance Group	12	Metro should develop and implement a standardized methodology for conducting counts of homeless persons based on best practices.	Agree	N/A	Metro has made arrangements with the Los Angeles Homeless Services Authority to include the Metro transit system in its periodic homeless person counting effort to ensure that the methods and criteria used for the Metro system is consistent to the Countywide counting methods.

No.	Report Number	Report Date	Audit Entity	Title	Staff Assigned	Rec No	Recommendation	Agree or Disagree	Completion Date Estimate	Response
13	23-AUD-03	11/9/2022	OIG/BCA	Metro Transit Security Performance Audit for Fiscal Years 2021 and 2022	Systems Security and Law Enforcement Compliance Group	13	<p>The Metro SSLE Department should consider further strengthening ongoing monitoring and oversight of compliance with the terms of the law enforcement services contracts by:</p> <p>a) Reinstating and expanding the field review approach to ensuring that contracted law enforcement personnel planned and scheduled to work for Metro are actually present and providing service.</p> <p>b) Including in future law enforcement contracts requirements that law enforcement personnel "TAP" each time they board or de-board trains or buses, and each time they enter or leave a station.</p> <p>c) Expanding the TAP Review approach to ensuring that contracted law enforcement personnel planned and scheduled to work for Metro are actually present and providing service. This should include reviewing all assignments during one randomly selected day each week rather than just one assignment per contracted law enforcement agency one day each week.</p> <p>d) Developing and implementing a GPS based review to ensuring that contracted law enforcement personnel planned and scheduled to work for Metro are actually present and providing service using GPS information from body worn cameras and automatic vehicle location systems.</p> <p>e) Including a periodic review of contract law enforcement agency compliance with contract requirements related to personnel qualifications and training in the Compliance Review Standard Operating Procedure.</p> <p>f) Incorporating in future law enforcement contracts procedures for adjusting billed amounts based on results of efforts to verify actual deployment of contracted law enforcement personnel. This should include the results of Field Reviews, TAP Reviews, and reviews conducted using GPS information from body worn cameras and automatic vehicle location systems.</p> <p>g) Reviewing the workload associated with expanded compliance reviews and current staff assigned to reviewing and ensuring compliance with the law enforcement services contract and requesting additional compliance staffing as needed.</p>	Agree	Ongoing	<p>a) SSLE's Compliance Group will reinstate field reviews</p> <p>b) This requirement is already in-place and is reaffirmed with TAP reviews</p> <p>c) The Compliance Group will look into expanding the TAP Review as OIG/BCA suggests</p> <p>d) SSLE will open this discussion with future awarded law enforcement contractors.</p> <p>e) SSLE has begun quarterly training/certification reviews as of 09/2022</p> <p>f) See responses for 3,4,5, 9, 10, and 11</p> <p>g) SSLE will request additional staff</p>
14	23-AUD-03	11/9/2022	OIG/BCA	Metro Transit Security Performance Audit for Fiscal Years 2021 and 2022	Systems Security and Law Enforcement Compliance Group	14	<p>Metro's SSLE Department should develop an expanded set of performance indicators, including indicators related to fare and code of conduct enforcement and critical infrastructure protection, for Metro Transit Security.</p>	Agree	7/1/2023	<p>SSLE will work on a set of KPIs for TSOs.</p>