



**Metro**

## Interoffice Memo

**Date** October 3, 2025

**To** Karen Gorman  
Inspector General

**From** Conan Cheung  
Chief Operations Officer

Conan Cheung

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Date: 2025.10.03 17:24:25 -08'00'

Jennifer Vides  
Chief Customer Experience Officer

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Date: 2025.10.03 17:17:15 -07'00'

**Subject** 25-AUD-07 Metro Bus Pass-Ups

The Office of the Inspector General (OIG) performed an audit of Metro Bus Pass-Ups. Although Metro complies with the safety standards for bus stops and ensures that Metro-owned bus stops meet regional accessibility and safety needs, several issues were identified. In those instances, Operations will comply with the audit recommendations:

1 – Metro should develop procedures in the following areas to ensure analysis, measurement, and management of bus pass-ups:

**Recommendation #1B:** Procedure to cover pass-up related data collected and how data will be used to reduce the number of pass-ups to include load factors, cancellations, school trippers, time of day, and other factors.

**Management Response:** Disagree; Service Development, Department's Scheduling team already has well-established procedures to address consistent crowding through added trips in each of the two annual service changes, as well as immediate actions for items such as school-related ridership in response to changes typically experienced at the start of each school semester (August, January). This is one of the core functions of the Scheduling team. The Scheduling team uses data to determine if and when systemic excessive loads exist. For specific instances of pass-ups that are more random in nature, such as impacts from day of trip cancellations, vehicle breakdowns, impacts to routes and traffic due to special events, construction and street closures, leading to less than full service being delivered, Transit Operations mitigate such disruptions as much as possible through Bus Operations Control and Vehicle Operations, such as adjusting headways, adding a gap bus, or putting an operator back on time to even out loads.

**Completion Date:** N/A

**Recommendation #1D:** Procedures for conducting Route/Line Capacity analysis.

**Management Response:** Disagree; The Service Development Department's Scheduling team already has a well-established process for identifying and addressing consistent capacity issues for all Metro bus lines. This process includes ridership and load data collected throughout the period leading up to each service change, analyzed in 20-minute increments during the peak hour and hourly increments during off-peak. This analysis is already a core function for the over twenty Schedule Analyst staff in

the Scheduling department to conduct. Each of these staff members is trained on the use of the relevant data reports to support any recommended addition of extra trips to address any loads consistently exceeding trip load standards in order to carry all intending riders and avoid passenger pass-ups.

**Completion Date:** N/A

**Recommendation #1E:** Procedures to handle scheduling and pass-up monitoring.

**Management Response:** Partially Agree; The Service Development Department reviews pass up complaints along with quantitative data on loads and ridership to identify times and locations of consistent pass-ups. Significant issues are addressed immediately through temporary increases to service, while other issues are addressed through the regular service change process.

**Completion Date:** N/A

**Recommendation #1F:** Update the ADA procedure for alternative accessible service to be fully compliant.

**Management Response:** Agree to the importance of the issue, but disagree that sufficient procedures are currently not in place; Procedures are already in place based on Metro Policy GEN 54, which addresses:

- Customers Using Mobility Devices
- Mobility Device Pass-ups
- Coordination with Access Services Inaccessible Bus Zones
- Equipment Problems Involving Wheelchair Ramps, or Securement Devices
- Defective Wheelchairs, Scooters, or other Mobility Devices, Customer at Stop
- Defective Wheelchairs, Scooters, or other Mobility Devices, Customer on Board
- Personal Mobility Devices Customers with Respirators
- Service Animals

**Completion Date:** N/A

**Recommendation #1F(i):** Persons Using Lifts - The SOP does not explicitly state that ambulatory persons (such as those with invisible disabilities or visual impairments) must be permitted to use lifts or ramps upon request. This provision should be added to the procedure. Add a provision explicitly stating that ambulatory passengers with disabilities must be permitted to use the lift or ramp upon request, regardless of whether they use a mobility device. This aligns with 49 CFR 37.165(g), which requires transit agencies to accommodate all persons with disabilities who request to use the lift or ramp.

**Management Response:** Agree; Bus Rule Book has been updated using OIG nomenclature and will be distributed to the divisions. It read as "Ambulatory passengers with disabilities must be permitted to use the lift or ramp upon request, regardless of whether they use a mobility device."

**Completion Date:** December 31, 2025

**Recommendation #1F(ii):** Address Equipment Failures More Explicitly - It is recommended that Metro clearly state that lifts be tested every day before leaving the division to be placed into service and that vehicles with inoperative lifts must be held back until fixed or taken out of service before the next

service day unless no spare is available. Metro should consider revising the Metro Bus Operations Control Standard Operating Procedures (SOP) 10.01– Accessible Service. 49 CFR 37.163

**Management Response:** Agree to the importance of the issue, but disagree that sufficient procedures are currently not in place; There is already a procedure in place– wheelchair ramps and securements must be checked during the Operator’s pre-trip inspection to ensure they are in operating condition prior to the bus leaving the yard. This is documented in the Operator’s Vehicle Condition Report (MAINT-9). All ADA equipment failures are held until repairs are completed. No buses are released by Maintenance with a non-operative wheelchair ramp or securements. Per the Bus Maintenance Department Road Call Procedures, Roles and Responsibilities SOP and ADA Wheelchair Road Call Response SOP, road failure buses are held until addressed with all necessary repairs made prior to being released back into service. All of this is in support of Metro’s CIV 09 policy: Providing Transportation Service to Individuals with Disabilities.

**Completion Date:** N/A

**Recommendation #1F(iii):** Strengthening Documentation and Reporting - The Current SOP includes documentation forms for incidents but lacks specific procedures for reporting accessibility-related complaints and equipment failures. 49 CFR 27.13(a)

**Management Response:** Agree; Bus Operation Control Center Management will work on enhancing our SOPs to include a better way of communicating equipment failures to the appropriate department. We currently have a procedure and notification when there is a reported equipment failure.

**Completion Date:** January 26, 2026

**Recommendation #1G:** Procedures to ensure that Metro includes mandatory ADA compliance training for all operators, focusing on assisting passengers with various disabilities, proper use of accessibility equipment, and handling service animals. 49 CFR 37.173

**Management Response:** Agree to the importance of the issue, but disagree that sufficient procedures are currently not in place; Procedures are already in place. All new student bus operators receive the Los Angeles Metro ADA Enhancement Training in compliance with Federal Transit Administration (FTA) mandatory Training Requirement (49 CFR Part 37), which addresses:

- ADA Laws and Regulations
- Vehicle Condition Report Card
- Communicating With Customers
- Visual Impairments
- Service Animals
- Hidden Disabilities
- Wheelchair Securement
- W/C Boarding Procedure + Script

**Completion Date:** N/A

**Recommendation #1H:** Procedures related to Service Animals - The current SOP states that Metro permits service animals but lacks detailed guidelines on handling situations where the service animal is out of control or poses a threat.

**Management Response:** Agree to the importance of the issue, but disagree that sufficient procedures are currently not in place; Procedures are already in place under the Metro Bus Operator Rulebook and Standard Operating Procedures-Rule 7.25 Transporting Animals, as well as the Metro Bus Operator Rulebook and Standard Operating Procedures - SOP 2.122 Animal on Board the Bus, which addresses:

- Metro Bus Operator Rulebook and Standard Operating Procedures-Rule 7.25 Transporting Animals
  - A handler must have full control of their animal whenever they are on board a Metro bus. If the handler requires assistance in handling the animal when boarding, the handler is considered not to have full control and the animal should not be allowed to board. When the animal is under the full control of the handler, they may board at any time.
  - Operators must notify a customer attempting to board with a service animal if there is another animal already on board. Although service animals are trained to be non-aggressive, there is always the possibility of aggression between any two animals. The boarding customer should be allowed to make the final decision whether to board the bus or not.
- Metro Bus Operator Rulebook and Standard Operating Procedures - SOP 2.122 Animal on Board the Bus
  - If the Operator has reason to believe the animal represents a threat to their safety or the safety of the customers, contact BOC immediately and await instructions. If the animal poses an imminent peril or threat on the bus (e.g., has bitten another passenger) open all doors and allow customers to alight the bus. Request the owner/handler to take control of the animal and remove it from the bus, and request assistance from BOC if necessary.

**Completion Date:** N/A

**Recommendation #1H(i):** It is recommended that Metro defines clear procedures for operators to follow if a service animal is out of control or poses a direct threat to the health or safety of others. 49 CFR 37.167(d)

**Management Response:** Agree to the importance of the issue, but disagree that sufficient procedures are currently not in place; Procedures are already in place under the Metro Bus Operator Rulebook and Standard Operating Procedures-Rule 7.25 Transporting Animals, as well as the Metro Bus Operator Rulebook and Standard Operating Procedures - SOP 2.122 Animal on Board the Bus, which addresses:

- Metro Bus Operator Rulebook and Standard Operating Procedures-Rule 7.25 Transporting Animals
  - A handler must have full control of their animal whenever they are on board a Metro bus. If the handler requires assistance in handling the animal when boarding, the handler is considered not to have full control and the animal should not be allowed to board. When the animal is under the full control of the handler, they may board at any time.
  - Operators must notify a customer attempting to board with a service animal if there is another animal already on board. Although service animals are trained to be non-aggressive, there is always the possibility of aggression between any two animals. The boarding customer should be allowed to make the final decision whether to board the bus or not.

- Metro Bus Operator Rulebook and Standard Operating Procedures - SOP 2.122 Animal on Board the Bus

If the Operator has reason to believe the animal represents a threat to their safety or the safety of the customers, contact BOC immediately and await instructions. If the animal poses an imminent peril or threat on the bus (e.g., has bitten another passenger) open all doors and allow customers to alight the bus. Request the owner/handler to take control of the animal and remove it from the bus, and request assistance from BOC if necessary.

**Completion Date:** N/A

**Recommendation #1I:** Procedure to perform Maintenance Checks for Accessibility Equipment - The current SOP addresses procedures when equipment fails but does not emphasize preventive maintenance. The procedure should include regular maintenance checks for all accessibility equipment to ensure functionality. 49 CFR 37.161 (a)

**Management Response:** Agree to the importance of the issue, but disagree that sufficient procedures are currently not in place; Bus Maintenance already performs preventive maintenance at regular intervals per the Preventive Maintenance Program as found in the Revenue Service Bus Maintenance Plan, Section 7. The wheelchair ramp, kneeling function, and all securements are checked during the general inspection PMP every 6,000 miles. The general inspection is documented in M3/EAMS, showing each of these items having been checked. The Wheelchair Ramp is specifically called out as a Supplemental Inspection with an interval of 6,000 miles that coincides with the General Bus Inspection.

**Completion Date:** N/A

**Recommendation #1J:** Procedures on how communications should be handled for all types of pass-ups.

**Management Response:** Agree; Management will post all data regarding pass-ups at divisions and communicate with division directors to ensure management is discussing bus pass-ups during RAP sessions.

**Completion Date:** October 30, 2025

**Recommendation #1K:** Ensure that corrective actions for pass-ups are consistent for operators and supervisors.

**Management Response:** Agree to the importance of the issue, but disagree that sufficient procedures are currently not in place; Operations currently has procedures in place based on the SMART and AFSCME contracts for progressive discipline on substantiated pass-ups.

**Completion Date:** N/A

**Recommendation #1L:** Procedures to hold ongoing meetings, including “RAP” sessions, on pass-up levels and corrective actions to improve.

**Management Response:** Agree; Divisions were notified on 9/15/2025 to include bus pass-up information in the RAP sessions.

**Completion Date:** Completed on September 15, 2025

2 – Key performance metrics should be established and tracked against pass-ups data for potential improvements. These metrics are noted below:

**Recommendation #2A:** Headway to load factor - The number and percentage of route trips per day when load factors exceed 1.0 may indicate a potential schedule adjustment as part of the schedule adjustment (shakeup) process or other mitigation as needed. Load Factors exceeding 1.3 should result in a schedule adjustment. This information is presently tracked by Metro.

**Management Response:** Agree to the importance of the issue, but disagree that sufficient procedures are currently not in place; The Service Development Department's Scheduling team already conducts the required analysis. Some trips exceed 1.0 standard but are not an indication of how likely they are to exceed 1.3. The 1.3 analysis may highlight periods that exceed the 1.3 standard, and if those are close to exceeding 1.3, then a broader solution will be applied to address the busy period beyond just looking narrowly at the 1.3 standard. Reports used provide the entire day of data.

**Completion Date:** N/A

**Recommendation #2B:** On time performance - Track on-time performance against a target goal of 100% on time, no time allowance for early or late by route/line, to be able to conduct process improvement analysis of how to improve bus scheduling.

**Management Response:** Disagree; The 100% target is not realistic for the multitude of factors impacting daily service delivery in a mixed-use, multimodal operating environment, resulting in travel time variability.

**Completion Date:** N/A

**Recommendation #2C:** Route and System-wide Load factors - Keep a load factor of 1.3 as the standard but evaluate passenger and wheelchair (WC) pass-ups by line/route/load factor for process improvement. Evaluate locations along routes where the passenger load is greatest. The maximum load point can differ by direction and by time of day. Long or complex routes may have multiple maximum load points, one for each segment. Also known as "peak load point."

**Management Response:** Agree; The Service Development Department's Scheduling team already addresses consistent load violations. However, reporting specifically for riders in wheelchairs pass-ups will be examined further as part of the December 2025 and June 2026 service changes.

**Completion Date:** December 31, 2025

**Recommendation #2D:** Percent of service delivered - Keep the target at 2% cancellation rate but evaluate periodically by line/route relating to complaints, and pass-ups.

**Management Response:** Agree; Operations will keep the target at a 2% cancellation rate and will continue to be evaluated periodically by line/route relating to complaints and pass-ups.

**Completion Date:** Ongoing

**Recommendation #2E:** Wheelchair pass-ups - Reduce the threshold from 6% to 3% for analysis. This is currently the highest level for any route but may not capture the poor performing routes.

**Management Response:** Partially Agree; Metro is the only agency monitoring this data, and as a result, has tightened the target goal from 6% to 5% in the 2025 Service Standards update adopted by Metro's board, based on aggressive, yet realistic expectations.

**Completion Date:** N/A

**Recommendation #2F:** General (non-wheelchair) Passenger pass-ups - Create a daily metric of total passenger pass-ups which should be reviewed periodically but no less than annually for development of a process improvement plan to reduce full bus passenger pass-ups.

**Management Response:** Partially Agree; Transit Service Delivery Department Pass-ups data is already available daily, but it only provides a partial understanding of the regularity, root cause, and impacts of the pass-ups. The majority of pass-ups occur on high-frequency lines where customer impacts are minimized due to the frequency of service. Reviewing the data along with campaigning strategies to address the root causes of pass-ups, such as cancelled service, mechanical breakdowns, passenger incidents, etc. are more appropriate ways that Operations is addressing the root cause of pass-ups.

**Completion Date:** N/A

**Recommendation #2G:** Pass-ups per 100,000 riders - Create a formal pass-up rate metric such as pass-ups/100,000 riders for each line/route. Track the metric each month and communicate the data to supervisors and operators through "RAP" sessions in each Division and other communication channels.

**Management Response:** Partially Agree; Transit Service Delivery would require pass-ups data from the Strategic Initiatives Department. Some issues need to be resolved, such as inconsistent reporting of pass-ups by operators. The inconsistencies are already significant at the system level and would be worse at the line level.

**Completion Date:** June 30, 2026

3 – Training should be completed for operators and Metro staff:

**Recommendation #3A:** Complete annual Refresher training to include pass-up procedures for operators and supervisors.

**Management Response:** Agree; ARTS curriculum has been revised with an emphasis on Rule 7.10 Refusing Transportation/Passing Up Customers/Passing Up Customers ADA Policy and Procedures Overview. The training states that the Operators must immediately notify BOC if a customer with a disability is unable to board. Additionally, operators should request guidance from BOC if any safety-related issue arises that could result in the denial of service to any customer. SOP 7.11 Passing Up Customers emphasizes that Operators must not intentionally pass up customers except when directed by Metro supervisory staff, the bus is full (notify BOC with location resume point and number of customers passed), coordinated stop-skipping between buses, Rapid/Express/Limited must verify ADA customers are not missed, or boarding creates a safety hazard. In all instances, the Operator must use good judgment and common sense. ADA compliance is mandatory with no exceptions.

**Completion Date:** October 31, 2026

**Recommendation #3B:** Include explanation of pass-up codes used in the Advanced Transportation Management System (ATMS).

**Management Response:** Agree; All the CA codes are for wheelchair pass-ups with the respective reasoning. The SC codes are for pass-ups not related to a wheelchair patron.

When a Controller creates the Incident report, they would select 'CA' or 'SC' as the P Code, then the sub code number that corresponds with the situation, i.e., a Pass-up of a wheelchair patron because 2 wheelchair patrons are already on board would be coded CA 170.

CA	110	WHEELCHAIRS - PASSUP / UNKNOWN REASON
CA	115	WHEELCHAIRS - OVERLOAD / STANDING
CA	120	WHEELCHAIR TOO WIDE FOR LIFT
CA	130	WHEELCHAIRS - DEFECTIVE LIFT / RED TAGGED
CA	140	WHEELCHAIRS - DEFECTIVE LIFT / PASS UP
CA	145	WHEELCHAIRS - DEFECTIVE LIFT / OPERATOR ERROR
CA	155	WHEELCHAIRS - DEFECTIVE LIFT / OPERATOR CLEARED
CA	160	WHEELCHAIRS - OPERATOR LACK OF TRAINING
CA	165	WHEELCHAIRS - NO KEY OR KEY PROBLEM
CA	170	WHEELCHAIRS - TWO W/C PATRONS
CA	171	WHEELCHAIRS - PASS UP, B.O. DOORS
CA	172	WHEELCHAIRS - W/C WON'T FIT, SEE COMMENTS
SC	100	SCH - OVERLOAD, PASS UP
SC	200	SCH - OVERLOADS, NO LEADER
SC	990	SCH - PASS UP NOT CLASSIFIED

CA-Community Assist

P Code-Pass-up Code

SC-Schedule

SCH-Schedule Related

**Completion Date:** Completed on September 15, 2025

**Recommendation #3C:** Discuss variation in operator management of pass-ups using good judgment and common sense.

**Management Response:** Agree; ARTS curriculum revision has been completed and distributed to OCI Instructors and will be made available to Division Instruction. OCI training places the emphasis on



SOP 7.11 Passing up Customers ADA Policy and Procedures Overview; the Operator is responsible for exercising good judgment and common sense.

**Completion Date:** December 31, 2025

**Recommendation #3G:** Develop public education campaigns for riders on the importance of being ready to board, being at the stop, being aware of when the bus is approaching, and making sure the operator knows you are waiting for the bus and can see you.

**Management Response:** Agree; The Marketing department in the Customer Experience office will develop a campaign to educate riders about being ready to board. Also, it will be important to communicate with riders any blind spots bus operators might have, so they can ensure they are in the line of sight of the bus operator while waiting for the bus.

**Completion Date:** December 31, 2025

**Recommendation #3H:** Train all appropriate staff on new procedures.

**Management Response:** Agree; OCI will schedule a Train the Trainer for Instructors, highlighting the revisions to the curriculum.

**Completion Date:** December 31, 2025

#### 4 – Physical Characteristics of Bus Stops:

**Recommendation #4A:** Create a procedure to review the physical characteristics of bus stops at which pass-ups occur due to passenger visibility or the passenger not being at the stop. When warranted by the physical review make changes to the bus stop such as adding or improving lighting; trimming vegetation; removing obstructions; or adding shade to encourage passengers to use the bus stop.

**Management Response:** Partially Agree; Tree trimming is the responsibility of each municipality's Urban Forestry or Dept. Of Public Works. Cities such as Pasadena prohibit Metro from trimming trees. Improved lighting is also a municipality of their street lighting bureau's responsibility. In addition, some municipalities have a contractor for their respective bus stop shelter/shade program. The Stops and Zones department is in regular communications with local jurisdictions on issues impacting Metro bus stops and works collaboratively to resolve those issues.

**Completion Date:** N/A

CC: Conan Cheung  
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