



STAFF REPORT INFORMATION ONLY

TTC Internal Audit Report – Transit Enforcement Unit

Date:	February 10, 2016
To:	TTC Audit and Risk Management Committee
From:	Head of Audit

Summary

A review has been completed of the Transit Enforcement Unit (TEU) within the Service Delivery Group. The audit included a review of the functions of the TEU following the 2013 investigation for employee time theft but not the controls and reporting processes that support the May 2014 Special Constables Agreement with Toronto Police Services, as finalization to certify Transit Enforcement Officers with Special Constables status was still underway at the time of audit field work.

The purpose of the review was to assess the adequacy and level of compliance by the TEU to corporate and departmental policies and procedures to ensure adherence with applicable transit security enforcement regulations and By-law provisions. Also, to assess the efficiency and effectiveness of key management, operational and administrative controls pertaining to the delivery of transit enforcement services and performance monitoring of TEU employees.

The audit testing indicated that the implementation of a GPS vehicle tracking system now allows Staff Sergeants to monitor the whereabouts of each TEU vehicle, and the deployment of Tetra Radios will allow further tracking of individuals in the future. This level of front-line supervision should deter TEOs from deviating from their regular duties.

The need for improved coordination and communication between TTC departments responsible for aspects of transit security related matters was also identified by Audit. Similar concerns about the utilization of TEU employees as customer service representatives instead of true security experts were noted in the 2014 APTA Safety Initiative Report. TEU management asserts that adoption of the Station Management Model enhances structure oversight and accountability, and strengthens supervision and performance monitoring of TEOs as TEOs are scheduled and assigned work that involves working closely with other TTC groups to respond to security situations, and their visible presence to customers at stations serves as a public security deterrent.

Financial Summary

This report has no financial impact beyond what has been approved in the current year's budget.

Accessibility/Equity Matters

There are no accessibility/equity matters resulting from the adoption of this report.

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Attachment

TTC Internal Audit Report – Transit Enforcement Unit



TORONTO TRANSIT COMMISSION

Audit of
Transit Enforcement Unit
Service Delivery Group

Covering Period:
January 2013 to November 2014

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EXECUTIVE SUMMARY

The mandate of TTC's Transit Enforcement Unit (TEU), formerly referred to as *TTC Special Constables Services* is to protect the integrity of the transit system, perform security functions over TTC properties and assets, and ensure that the transit system is a safe and reliable form of transportation.

The TTC operates the transit system in accordance with the City of Toronto Act, and under this authority, enacted TTC By-law No. 1. This By-law identifies the rules that TTC customers are expected to follow for safety and comfort. Transit Enforcement Officers (TEOs) may issue a ticket to By-law violators along with either a provincial offence notice (PON) indicating the set fine for the offence or a Summons which compels the violator to attend court.

In 2013, several TEU employees were dismissed for issuing falsified PON tickets to account for inappropriate time spent away from their required duties. TEU management at the time acknowledged the risk is high that TEOs may issue falsified PONs to individuals with no fixed address because the likelihood of such tickets being detected is low. Collusion amongst involved TEOs and their supervising Sergeants was also a contributing factor to such time theft schemes. Following an investigation, the need to improve front-line supervision and performance monitoring of TEOs was identified.

The objective of this review was to assess the efficiency and effectiveness of processes and procedures followed by the TEU subsequent to the 2013 incident to ensure risks associated with transit security and enforcement were addressed.

Operating Procedures and Supervisory Controls

The implementation of a GPS vehicle tracking system now allows Staff Sergeants to monitor the whereabouts of each TEU vehicle. The deployment of Tetra Radios will allow further tracking of individuals in the future. This level of front-line supervision should deter TEOs from deviating from their regular duties.

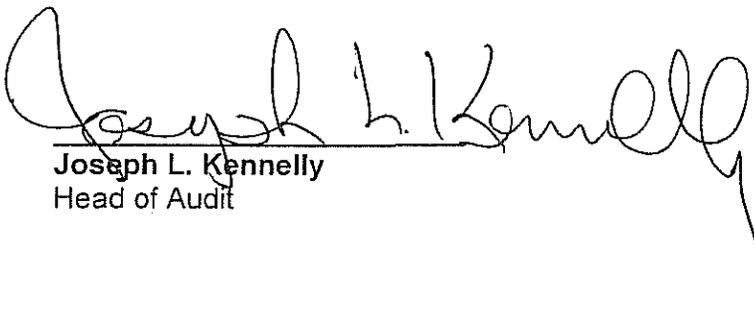
The effectiveness of other operating procedures and supervisory controls implemented following the 2013 incident to address underlying risks associated with the issuance of falsified PONs is deficient. TEU Management intends to consult with TTC's Prosecutor and Toronto Police Services, as well as, examine law enforcement audit models of other agencies to develop appropriate guidelines for dealing with persistent loiterers and individuals with no fixed address.

Security Response

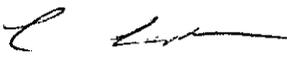
The need for improved coordination and communication between TTC departments responsible for aspects of transit security related matters was identified. Similar concerns about utilizing TEU employees as customer service representatives instead of true security experts, and Special Constables inadvertently assisting with operational related functions instead of dedicated security related duties were stated in the 2014 APTA Safety Initiative Report. TEU Management asserts supervision and performance monitoring of TEOs has been strengthened via TTC's adoption of the Chief Service Officer Stations Management Model. TEOs are scheduled and assigned work that involves working closely with other TTC groups to respond to security situations, and their visible presence to customers at stations serves as a public security deterrent. TEU Management considers the Station Management Model to enhance structure oversight and accountability.

Conclusion

Addressing the recommendations in this report and continuing efforts to create a positive relationship between TEU and other TTC front-line employees will strengthen the effectiveness of controls for risks associated with transit security and enforcement.



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Head of Audit



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BACKGROUND

The TTC's Transit Enforcement Unit (TEU) mandate is to protect the integrity of the transit system, perform security functions over TTC properties and assets, and ensure that the transit system is a safe and reliable form of transportation.

The TTC operates the transit system in accordance with the City of Toronto Act, and under this authority, enacted By-law No. 1 to regulate the use of the system. In July 1987, at TTC's request and with the approval of the then Solicitor General, employees responsible for safety and security on the transit system were appointed as Provincial Offences Officers to enforce TTC By-law No. 1. These officers provide a visible presence, respond to calls for service, and carry out activities to preserve the peace and protect the safety of TTC customers, employees and assets.

The Toronto Police Services (TPS) Board is responsible for the provision of police services in the City of Toronto pursuant to the provisions of Part III of the Police Services Act. In June 1997, the TPS Board designated Transit Enforcement Officers (TEOs) as Special Constables. This designation was governed by a contractual agreement between the TPS and the TTC, and conferred Special Constables with limited law enforcement powers and authorities in accordance with the Police Services Act. These enhanced authorities were designed to increase the level of effectiveness and efficiency in delivering security and limited law enforcement services where it was neither possible nor practical for a police officer to respond in a timely manner.

In 2009, the TPS created a Transit Patrol Unit to take a more proactive role in policing the subway system, and to provide direction and assistance to the TTC Special Constables. The TTC Special Constable Services Department became the Transit Enforcement Unit (TEU) and began to focus on core responsibilities such as revenue protection, fare enforcement and enforcement of TTC By-law No. 1. After several years it was recognized that proactive fare and By-law enforcement are generally not matters of public safety; therefore, the agreement between TTC and the TPS was terminated in February 2011.

On May 15, 2014, a new Special Constable Agreement was reached with the TPS Board to designate the newly branded TEOs again as Special Constables with limited powers and authorities under selected federal and provincial statutes. These restored authorities were conferred to support the enforcement of TTC By-law No. 1. The TEU Policies, Procedures and Rules Manual were reviewed and updated in May 2014 to ensure consistency with this new Agreement, in particular, guidelines governing Special Constable training, use of force, complaints and discipline processes.

As of January 2015, there were 40 uniformed TEO Special Constables, 2 Staff Sergeants and 4 Sergeants within the TEU. This section is responsible for TTC By-law No. 1 enforcement, emergency response, patrol, crime prevention, fare enforcement and customer service duties in order to protect the TTC's interests. The TTC is accountable to the TPS Board for actions taken in relation to the exercise of the powers granted to Special Constables per the May 2014 agreement. In addition to outlining minimum documentation and reporting process, the TPS Board, or its designate, may audit the TTC's TEO Program to ensure compliance with the terms and conditions of the agreement and any appointment of a TEO Special Constable.

In 2013, several TEU employees were dismissed for issuing falsified tickets to account for inappropriate time spent away from their required duties. Audit identified in its 2014 Audit Plan the need to review the efficiency and effectiveness of operational processes and procedures followed by the TEU subsequent to the 2013 incident to ensure risks associated with transit

security and enforcement were adequately addressed. The previous audit of the TEU was completed in 2005.

AUDIT SCOPE AND OBJECTIVES

Scope: This audit includes a review of the functions of the TEU for the period of January 2013 to November 2014. However, the transitional processes followed by TTC to certify Transit Enforcement Officers with Special Constables status, as well as the adequacy of TTC controls and reporting processes that support the Toronto Police Services oversight and accountability for the new May 2014 Special Constables Agreement were not reviewed as finalization of obtaining Constable status was still underway at the time of audit field work.

Objectives: To assess the adequacy and level of compliance by the TEU to corporate and departmental policies and procedures to ensure compliance with applicable transit security enforcement regulations and By-law provisions.

To assess the efficiency and effectiveness of key management, operational and administrative controls pertaining to the delivery of transit enforcement services and performance monitoring of TEU employees.

To follow-up the effectiveness of controls implemented subsequent to the 2013 incident of time theft to ensure that risks associated with transit security and enforcement were addressed.

METHODOLOGY

Key functions of the TEU were identified through preliminary lines of inquiry during the planning phase. An assessment of the audit risk of each key function was completed at the end of the planning phase with areas requiring further detailed audit testing established. Detailed audit testing consisted of investigating anomalies, trend analysis, sample testing of documents and discussions with TEU staff and management.

ANALYSIS AND RECOMMENDATIONS

Finding #1: Operating Procedures and Supervisory Controls

OBJECTIVE: To assess the adequacy of operating procedures and supervisory controls put in place to ensure efficient and effective adherence to transit enforcement regulations and By-law provisions.

ANALYSIS: The general purpose of TTC By-law No. 1 is to list rules that TTC customers are expected to follow for safety and comfort. A person who contravenes any provision of this By-law may be removed from the transit system and TTC property, have any fare media confiscated by the TTC, and is guilty of an offence that upon conviction is liable to a fine under the Provincial Offences Act (POA).

Although verbal cautions may be enough, under the Provincial Offences Act, Transit Enforcement Officers (TEOs) may issue a ticket to By-law violators along with either a provincial offence notice (PON) indicating the set fine for the offence or a Summons. When issued a PON, an individual has a number of options depending on whether they wish to dispute the charge. However, a Summons compels the person to attend court. The decision whether to issue a PON or a Summons is at the TEO's discretion, and depends upon the nature of the offence and/or the circumstances or consequences of the offence.

TEOs are made aware of social assistance options for homeless individuals and provided sensitivity training, but per the TTC Prosecutor, issuing PONs to homeless individuals is not effective. Alternatively, a TEO issuing a Summons may bring resolution as individuals are informed immediately of the date they must attend court, and made aware that failure to do so may trigger further reprimand via the court system.

In 2013, following an investigation, TEU management at the time identified underlying risks to improve front-line supervision and performance monitoring of TEOs. Specifically, TEU management acknowledged the risk that TEOs may issue falsified PONs to individuals with no fixed address is high because the likelihood of such tickets being detected is low. Contributing factors may include collusion amongst involved TEOs and their supervising Sergeants, as was the case in 2013.

No policy or strategic protocol is in place to govern how TEOs should deal with persistent loiterers and individuals with no fixed address. While TEU management proactively developed procedures and reports designed to improve documentation quality and trend analysis, Audit noted the following weaknesses that

diminishes their effectiveness at reducing the risk of fraudulent PONs being issued and going undetected:

- Evidence to support the completion of weekly reviews and reconciliation of TEO memo books documentation to small samples of PONs issued by Staff Sergeants is not retained.
- Reports designed to analyze PONs and identify anomalies and patterns similar to those identified in the 2013 incident for follow-up are not being prepared. Per Audit's analysis of available PONs data, 594 (16%) of all PONs issued in 2014 were to individuals with no fixed address, in contrast to only 60 Summons, for a ratio of 10:1. A pattern was noted that certain TEOs tend to issue only PONs to individuals with no fixed address.
- Informal expectations of each TEO completing a target number of monthly PONs and the potential impact this can have on triggering the issuance of falsified tickets has not been addressed.

TEU management recognizes that front-line supervision is critical for preventing and detecting TEO misconduct. Since the 2013 incident, a GPS tracking system has been implemented allowing Staff Sergeants to monitor live feed as to the whereabouts of each TEU vehicle. However, further system improvements that will allow GPS tracking of individual TEOs are still pending.

Sergeants and Staff Sergeants are required to inspect, without delay, all applicable reports and memorandum books submitted by TEOs and TFIs for accuracy and completeness. In particular, TEOs and the new Transit Fare Inspectors (TFIs) are required to document supervisory officer visits in their memorandum books. Sergeants are required to document their visits to TEOs and TFIs in their memo books and report the total field visits conducted each day.

Based on the sample of memo books reviewed, it was noted that supervisory officer field visits were documented sporadically by the involved TEOs, TFIs and Sergeants in their memo books. Daily reports of Sergeants' visits did not note key details such as visit times, locations and applicable TEOs/TFIs. This lack of corroborating evidence and reconciliation process reduces the effectiveness of this supervisory control.

Although hours reported by TEOs and TFIs in Patrol Officer Logs are broken down into numerous categories, the data is not reconcilable with supporting documentation or memo book entries, and summarized information is not being utilized.

RECOMMENDATIONS: Management should:

- (a) in consultation with TTC's Prosecutor and Toronto Police Services, consider strategies for the effective management of persistent loiterers and individuals with no fixed address. This would include developing a protocol that gives clear direction as to when PONs or Summons should be issued to persistent loiterers with no fixed address; and implementing effective controls to monitor adherence by TEOs to these guidelines
- (b) reduce the risk of TEOs issuing falsified PONs to individuals with no fixed address by using strategic data analytics to review all PONs issued and existing reporting tools to identify anomalies and questionable trends for further investigation; and ensure any data or reports used are accurate and complete, and results of follow-up investigations are documented
- (c) strengthen monitoring controls and corroborating evidence requirements to ensure effective front-line supervision; for example, cross-reference all sources of information to ensure activities and supervisor visits reported by TEOs and Sergeants are consistent, and document pertinent details and results of all supervisory reviews conducted as evidence of completion

MANAGEMENT RESPONSE AND ACTION PLAN

Recommendation: *Management should, in consultation with TTC's Prosecutor and Toronto Police Services, consider strategies for the effective management of persistent loiterers and individuals with no fixed address. This would include developing a protocol that gives clear direction as to when PONs or Summons should be issued to persistent loiterers with no fixed address; and implementing effective controls to monitor adherence by TEOs to these guidelines.*

Responsibility: *Mark Cousins, Head – Transit Enforcement*

Action Plan: *Agree. Persons advising they are of No fixed address (NFA) are not necessarily forthright. Recidivists often report they are NFA in an attempt to evade Collection agencies under contract to the Province. Provincial Trespass legislation/By-Laws only require the offender to supply name/D.O.B. Officers continue to enforce the By-law utilizing NFA as the only tangible method to lay charges in response to a violation without incurring the case preparation/court time associated with the issuance of a summons for persons not identified as frequent offenders. Officers should issue Summons to those offenders who have incurred a series of PON convictions in an effort to compel their attendance in court. The TEU is engaging our Law Enforcement partners/TTC Legal to develop a clear direction with regard to the issuance of PONs vs. Summons. If the agreed upon course of action is determined to allow for the issuance of PONs with NFA, the appropriate review will be implemented which will include, at a minimum, a random audit of NFA PONs to determine whether or not the policy is being followed.*

Consultation with Toronto Police Service regarding policy/direction pertaining to NFA POA charges. Meeting scheduled for September 24th 2015.

Subsequent to the September 24th meeting with Toronto Police Service, ongoing discussions will continue to satisfactorily resolve the NFA POA issues.

Consultation with TTC Legal –TTC Provincial Prosecutor (ongoing)

Completion Date: *March 2016*

Recommendation: *Management should reduce the risk of TEOs issuing falsified PONs to individuals with no fixed address by using strategic data analytics to review all PONs issued and existing reporting tools to identify anomalies and questionable trends for further investigation; and ensure any data or reports used are accurate and complete, and results of follow-up investigations are documented.*

Responsibility: *Mark Cousins, Head – Transit Enforcement*

Action Plan: *Agree. The TEU is examining law enforcement specific audit models in an effort to develop a tool that will enable the section to address anomalies/trends.*

The TEU has requested/received audit models from other agencies. These models are currently under review.

Completion Date: *March 2016*

Recommendation: *Management should strengthen monitoring controls and corroborating evidence requirements to ensure effective front-line supervision; for example, cross-reference all sources of information to ensure activities and supervisor visits reported by TEOs and Sergeants are consistent, and document pertinent details and results of all supervisory reviews conducted as evidence of completion.*

Responsibility: *Mark Cousins, Head – Transit Enforcement*

Action Plan: *Agree. Existing controls have been strengthened. Sergeants have been directed to document field visits. Memo book inspections/sign-off are to be completed daily, as well as, reports/memo book/calls for service reconciliation. Supervision and oversight is strengthened via the Chief Service Officer Stations Management Model. Officers are assigned specific details in the A.M. and P.M. such as Bus safety initiatives involving speed measuring devices (LIDAR). Officers assigned to the detail work directly with Divisional Route Supervisors. Other Officers are assigned static peak period posts (A.M. and P.M.) where they work in conjunction with Station Managers. Additional field offices have come on line with TEU work stations. All employees under the Stations umbrella share the work space. The Station Management group provides additional oversight over members of the TEU. TEO vehicles are tracked through GPS and TEU Management will be able to track individuals once Tetra Radios are deployed.*

Completion Date: *Completed*

Finding #2: Security Response

OBJECTIVE: To assess the adequacy of controls in place to ensure the efficient and effective coordination and communication between TTC departments responsible for transit security related matters.

ANALYSIS: Transit Enforcement Officers (TEOs) respond to radio calls dispatched by Transit Control to address incidents that threaten the safety of TTC patrons, employees and assets. If TEOs fail to respond or are deemed unavailable, Transit Control may contact Station Managers or Route Supervisors to ensure a TTC representative arrives at a scene as soon as possible.

Following the 2013 investigation of the TEU, preliminary discussions were held between TEU and Transit Control management regarding reasonable TEO call-in requirements and circumstances when a TEU Sergeant should be contacted. Currently, Transit Control will provide TEU Sergeants or Staff Sergeants informal feedback regarding questionable TEO behavior on an as needed basis, if something comes to their attention. However, no formal protocol outlining measurable and reportable performance indicators has been established.

Based on a review of sample customer complaints sent to TEU in October 2014, Audit noted the majority of them actually fell under Investigative Services, a department that now operates separately from the TEU as part of Human Resources. Attempts to clarify the nature of complaints that should be directed to the TEU versus those that should be directed elsewhere have not resulted in effective change. Furthermore, tools provided by Customer Service to TEU in May 2014 to facilitate the response process have not been fully effective.

RECOMMENDATIONS: Management should:

- (a) develop quantifiable performance indicators for those aspects of TEO responsibilities that should be closely monitored, with consideration to the independent data and corroboration of information that can be provided by Transit Control; and implement effective supervisory controls that monitor adherence by TEOs to these guidelines and document the results of any follow-up investigations of noted anomalies and trends in performance
- (b) develop guidelines that distinguish between the types of customer complaints that require a TEU response from those that are brought forward for information only or that require action from other areas, such as Investigative Services, and resolve training issues to ensure the effective use of customer service tools and systems

MANAGEMENT RESPONSE AND ACTION PLAN

Recommendation: *Management should develop quantifiable performance indicators for those aspects of TEO responsibilities that should be closely monitored, with consideration to the independent data and corroboration of information that can be provided by Transit Control; and implement effective supervisory controls that monitor adherence by TEOs to these guidelines and document the results of any follow-up investigations of noted anomalies and trends in performance.*

Responsibility: *Mark Cousins, Head – Transit Enforcement*

Action Plan: *Agree. Transit Enforcement Unit Officers are assigned details on a daily basis. The details can encompass working with Transportation Supervisors or working in conjunction with Station Management Personnel. The details are scheduled in consultation with Station Managers reflecting static positions throughout the system for a specified time period. Officers work with front-line personnel supporting Commission initiatives and providing effective customer service. Transit Officer call sheets/detail sheets reflect calls for service/other matters addressed throughout the course of each officers' tour of duty. The implementation of the Station Management model provides enhanced structure over-sight and accountability. Officers' time spent in locations/on specific details replace the previous regime's reliance upon Enforcement numbers as the only quantifiable measure of an Officer's tour of duty.*

Completion Date: *Completed*

Recommendation: *Management should develop guidelines that distinguish between the types of customer complaints that require a TEU response from those that are brought forward for information only or that require action from other areas, such as Investigative Services. Resolve training issues to ensure the effective use of customer service tools and systems.*

Responsibility: *Mark Cousins, Head – Transit Enforcement*

Action Plan: *Agree. The TEU and Investigative Services have developed a response protocol with Customer Service. Supervisory Members of the TEU/Investigative Services have direct access to the Customer Service data base and are able to update the reports. Customer Service agents have been directed to contact Transit Control for incidents/events that require immediate attention.*

Completion Date: *Completed*

Summary of Recommendations, Management Responses and Action Plans

Finding #	Recommendation	Agree	Disagree	Management Response	Timeline for Implementation
1 (a)	Management should, in consultation with TTC's Prosecutor and Toronto Police Services, consider strategies for the effective management of persistent loiterers and individuals with no fixed address. This would include developing a protocol that gives clear direction as to when PONs or Summons should be issued to persistent loiterers with no fixed address; and implementing effective controls to monitor adherence by TEOs to these guidelines.	Agree		Persons advising they are of No fixed address (NFA) are not necessarily forthright. Recidivists often report they are NFA in an attempt to evade Collection agencies under contract to the Province. Provincial Trespass legislation/By-Laws only require the offender to supply name/ D.O.B. Officers continue to enforce the By-law utilizing NFA as the only tangible method to lay charges in response to a violation without incurring the case preparation/court time associated with the issuance of a summons for persons not identified as frequent offenders. Officers should issue Summons to those offenders who have incurred a series of PON convictions in an effort to compel their attendance in court. The TEU is engaging our Law Enforcement partners/TTC Legal to develop a clear direction with regard to the issuance of PONs vs. Summons. If the agreed upon course of action is determined to allow for the issuance of PONs with NFA, the appropriate review will be	<p>Consultation with Toronto Police Service regarding policy/direction pertaining to NFA POA charges. Meeting scheduled for September 24th 2015.</p> <p>Subsequent to the September 24th meeting with Toronto Police Service, ongoing discussions will continue to satisfactorily resolve the NFA POA issues.</p> <p>Consultation with TTC Legal –TTC Provincial Prosecutor (ongoing)</p> <p>Estimated Completion Date: March 2016</p>

Finding #	Recommendation	Agree	Disagree	Management Response	Timeline for Implementation
				implemented which will include, at a minimum, a random audit of NFA PONs to determine whether or not the policy is being followed.	
1 (b)	Management should reduce the risk of TEOs issuing falsified PONs to individuals with no fixed address by using strategic data analytics to review all PONs issued and existing reporting tools to identify anomalies and questionable trends for further investigation; and ensure any data or reports used are accurate and complete, and results of follow-up investigations are documented.	Agree		The TEU is examining law enforcement specific audit models in an effort to develop a tool that will enable the section to address anomalies/trends.	The TEU has requested/received audit models from other agencies. These models are currently under review. Estimated Completion Date: March 2016
1 (c)	Management should strengthen monitoring controls and corroborating evidence requirements to ensure effective front-line supervision; for example, cross-reference all sources of information to ensure activities and supervisor visits reported by TEOs and Sergeants are consistent, and document pertinent details and results of all supervisory reviews conducted as evidence of completion.	Agree		Existing controls have been strengthened. Sergeants have been directed to document field visits. Memo book inspections/sign-off are to be completed daily, as well as, reports/memo book/calls for service reconciliation. Supervision and over sight is strengthened via the Chief Service Officer Stations Management Model. Officers are assigned specific details in the A.M. and P.M. such as Bus safety initiatives involving speed measuring devises (LIDAR). Officers assigned to the detail work directly with Divisional Route Supervisors. Other Officers are	Completed

Finding #	Recommendation	Agree	Disagree	Management Response	Timeline for Implementation
				<p>assigned static peak period posts (A.M. and P.M.) where they work in conjunction with Station Managers. Additional field offices have come on line with TEU work stations. All employees under the Stations umbrella share the work space. The Station Management group provide additional oversight over members of the TEU. TEO vehicles are tracked through GPS and TEU Management will be able to track individuals once Tetra Radios are deployed.</p>	
2 (a)	<p>Management should develop quantifiable performance indicators for those aspects of TEO responsibilities that should be closely monitored, with consideration to the independent data and corroboration of information that can be provided by Transit Control; and implement effective supervisory controls that monitor adherence by TEOs to these guidelines and document the results of any follow-up investigations of noted anomalies and trends in performance.</p>	Agree		<p>Transit Enforcement Unit Officers are assigned details on a daily basis. The details can encompass working with Transportation Supervisors or working in conjunction with Station Management Personnel. The details are scheduled in consultation with Station Managers reflecting static positions throughout the system for a specified time period. Officers work with front-line personnel supporting Commission initiatives and providing effective customer service. Transit Officer call sheets/detail sheets reflect calls for service/other matters addressed throughout the course of each officers' tour of duty. The implementation of the Station</p>	Completed

Finding #	Recommendation	Agree	Disagree	Management Response	Timeline for Implementation
				Management model provides enhanced structure over-sight and accountability. Officers' time spent in locations/on specific details replace the previous regime's reliance upon Enforcement numbers as the only quantifiable measure of an Officer's tour of duty.	
2 (b)	Management should develop guidelines that distinguish between the types of customer complaints that require a TEU response from those that are brought forward for information only or that require action from other areas, such as Investigative Services, and resolve training issues to ensure the effective use of customer service tools and systems.	Agree		The TEU and Investigative Services have developed a response protocol with Customer Service. Supervisory Members of the TEU/Investigative Services have direct access to the Customer Service data base and are able to update the reports. Customer Service agents have been directed to contact Transit Control for incidents/events that require immediate attention.	Completed