SOUND TRANSIT

PUBLIC SAFETY PROGRAM PERFORMANCE AUDIT

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I. EXECUTIVE SUMMARY

In June 2014 Sound Transit (the Agency) elected to conduct a performance audit of the public safety program due to evolving security requirements and continuing expansion. Eleven objectives were defined, focusing on areas of interest and current challenges. Objectives included analysis of organizational alternatives, cost/benefit, maturation of the system, and security delivery. The audit objectives were refined through interviews with Internal Audit and Senior Management. Crime data, benchmarking, and performance measurement were the study's main focuses in its aim to improve fare enforcement, law enforcement, and security management functions.

The study period of 2014-15 was a particularly good time to study the Agency's public safety program. System expansion is prompting a reexamination of how security is delivered, resourced, and funded. The security functions have been evolving as expected and continue to mature in parallel to the Agency's expansion. Given the Agency's future needs, corresponding plans for expansion, and administrative and management evolution, additional attention is being contemplated related to planning and analysis over service levels and costs.

Each observation discussed in this report identifies potential improvement opportunities pertaining to efficiency, effectiveness, and/or economics. This performance audit identifies seven observations summarized as follows:

Observations and Recommendations	
A. Overall Public Safety Program Alternatives	
Observation	Numerous security and law enforcement deployment alternatives have been defined by the Agency; however, the level of analysis conducted relative to each alternative has been limited.
Recommendation	Study alternative deployment models in further depth, taking into account program needs, resources, and desired outcomes.
B. Public Safety Program Partner Agreements	
Observation	Formal inter-local agreements between the region's many security/law enforcement providers and Sound Transit are limited, leaving Sound Transit without a clear definition of roles and responsibilities to ensure an optimal alignment of resources for public safety.
Recommendation	Develop Memoranda of Agreement (MOUs) as appropriate where roles and responsibilities would benefit from further definition or where coordination of resources is complex.
C. Crime Data	
Observation	Sound Transit produces crime data at basic levels, but does not utilize such information for advanced analysis or for detailed planning purposes.
Recommendation	Develop systems to capture crime data, and assign new resources to the process.

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Observations and Recommendations	
D. Scope of Administration	
Observation	The Sound Transit Security and Law Enforcement Divisions spend much of their time and resources on operational matters, and significantly less time on administrative functions.
Recommendation	Allocate additional resources to administrative functions, including data analytics, performance reporting, planning, financial, and risk management activities.
E. Performance Measurement	
Observation	The public safety performance measurement program has an established procedure that focuses on internal Sound Transit processes and tracks outputs with basic available data; otherwise, important information is missing regarding outcomes of the security and enforcement functions, including information provided by external third-party partner agencies.
Recommendation	Develop additional security and law enforcement efficiency and performance measures, which will add important data relative to tracking outcomes and program effectiveness.
F. Third-Party Data Reporting	
Observation	While Sound Transit gathers some relevant data from peer government jurisdictions, it is not gathering comprehensive data that could be useful in alternatives, cost, and service delivery analysis.
Recommendation	Develop updated processes and systems to capture data from regional peers and combine with Sound Transit's database to deliver a data reporting system that can further help the Agency analyze operational effectiveness.
G. Correlation of Fare Enforcement and Law Enforcement	
Observation	The relationship between law enforcement, security, and fare enforcement functions is understood at a macro level, but has not been fully analyzed to identify optimal staffing levels for each function.
Recommendation	Study the correlation between fare and law enforcement functions to optimize resource efficiency and fare collection effectiveness.

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II. PROJECT BACKGROUND AND SCOPE

This section of the report introduces the project background, discussing scope and methodology, and makes a statement of Generally Accepted Government Auditing Standards (GAGAS) compliance.

A. BACKGROUND

Over the past several years, numerous issues have been raised related to Sound Transit's security and enforcement functions. Many questions and issues are driving this audit, including:

- The State Auditor's finding during a recent audit that more administration is necessary.
- The need to define the scope of resources placed on the street, including those required for system expansion.
- The need to maintain control over cost/benefit, as well as managing alternatives, over security and enforcement functions.
- Whether the Agency is optimizing its resources, addressing management's question about alignment among the regional operations throughout the many jurisdictions that Sound Transit serves.
- What the optimal management and administrative structure should look like.

B. SCOPE

The Agency has been evolving rapidly, especially since 2008 with the approval of ST2 and the opening of Central Link. The Agency's Public Safety program has been maturing in parallel. Management over these functions has also changed over the years, both in terms of organizational structure and hierarchy, as well as reporting relationships.

The scope of the performance audit was to evaluate the Public Safety Program managed by Sound Transit's Security and Law Enforcement Divisions, and identify opportunities to improve efficiency and effectiveness and save costs, including an analysis of alternatives and comparison to industry standards and best practices. The specific objectives of the audit included:

1. Identify level of public safety and related spending options via cost/benefit analysis.
2. Describe Homeland Security compliance requirements in the Puget Sound region and identify alternative strategies to address.
3. Evaluate options to manage, oversee, and coordinate transit public safety with the 54 separate local governments within Sound Transit's geographic boundaries.
4. Identify potential alternative public safety program delivery structures.
5. Evaluate the Agency's organizational alignment of security and law enforcement to facilitate public safety.

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6. Assess the effectiveness of the fare enforcement program.
7. Conduct peer analysis and benchmarking, surveying how other train/transit systems address public safety.
8. Identify opportunities to capture and use crime data.
9. Define what public safety standard requirements exist for public and private transportation entities.
10. Describe available security performance measures and recommend which should be reported and how to collect data.
11. Review the Agency's threat and vulnerability assessments and consider alternative mitigation strategies.

C. METHODOLOGY

The study team based results of the performance audit on fact-finding, heavily relying on documentation provided by Agency staff, as well as interviews conducted with staff. Within the scope of this audit, we identified observations and developed corresponding recommendations for change. The audit methodology included four phases of work including 1) project initiation and ongoing management, 2) fact-finding, 3) analysis, and 4) reporting. Specific audit activities included:

- Conducting interviews and process walkthroughs with over 25 Sound Transit personnel, representing:
    - Agency leadership and management
    - Administrative staff
    - Operations personnel responsible for security, fare enforcement, and law enforcement functions
- Reviewing Agency documentation, including policies and procedures, prior audits, organization charts, job descriptions, training, and guidelines.
- Researching select best practices related to audit objectives:
    - Federal Transit Administration (FTA)
    - The Washington State Department of Transportation (WSDOT)
    - American Public Transportation Association (APTA)
- Conducting peer analysis with three peer agencies including Greater Cleveland Regional Transit Authority (GCRTA), Tri-County Metropolitan Transportation District of Oregon (TriMet), and Sacramento Regional Transit District (SACRT).

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Throughout the project, the audit team met with a group of stakeholders representing Sound Transit executive leadership, finance, law enforcement, security, fare enforcement, and facilities. Audit team members met collectively and individually with stakeholder group participants. The stakeholder group validated facts, provided input on the feasibility of recommendations, and participated in the development of the action plan.

D. STATEMENT ON COMPLIANCE WITH GAGAS

Moss Adams conducted this performance audit in accordance with GAGAS. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our observations and recommendations based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our observations based on our audit objectives.

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III. OBSERVATIONS AND RECOMMENDATIONS

A. OVERALL PUBLIC SAFETY PROGRAM ALTERNATIVES

Observation: Numerous security and law enforcement deployment alternatives have been defined by the Agency; however, the level of analysis conducted relative to each alternative has been limited.

Condition

Since the public safety program's inception at Sound Transit, the Agency's approach to resource deployment has been consistent. The future deployment plan is set to follow the same approach, deploying resources "incrementally during the system expansion." The plan is to provide necessary new services and resources on the same relative scale.

In the past, law enforcement deployment was largely defined by the King County Sheriff's Office (KCSO) and their definition is still in use to this day. Likewise, past fare enforcement and security deployment was defined by Sound Transit's security team.

The current deployment approach for security is to contract out services to Securitas to provide noncommissioned officers. The contractor security presence is to establish and maintain a safe environment where serious crimes are less likely to occur. The role includes promoting voluntary public compliance of transit conduct rules. Aside from maintaining a security presence, another key role for these resources is to assist in customer service.

Security

Specific duties of the security unit include:

- Proactively enforcing safety and security policies and procedures
- Assisting the traveling public with a customer service approach
- Administering Sound Transit's security procedures and approved post orders at designated facilities
- Controlling access of persons, vehicles, and other property
- Maintaining free and safe access to transit for authorized users
- Conducting site surveillance
- Monitoring the public and watching for potential disturbances
- Identifying, investigating, and reporting security and safety events
- Maintaining files for security-related documentation
- Assisting Sound Transit personnel in emergent situations
- Notifying law enforcement of any illegal or unauthorized activity

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- Ensuring that prompt action is taken to prevent or minimize losses, accidents, fires, property damage, safety hazards, and security incidents
- Providing parking enforcement
- Providing parking and/or passenger counts

Public safety program deployment includes fixed and mobile patrols, fare enforcement officers (FEOs), and staffing the Security Operations Center (SOC). Sound Transit security deploys resources based upon results from the Agency's risk assessment. The risk assessment process looks at violent and property crimes and develops a risk evaluation (scale) that ranks high, medium, and low risks. Once evaluated, staff assignments are made according to cost/benefit analysis. Staffing of specific facilities ranges from zero to fully staffed sites. Those that are not staffed are patrolled on a random basis.

Primary tasks of the FEOs similarly include transit security and customer service. Primary fare enforcement duties include:

- Conducing fare inspections
- Issuing appropriate warnings/citations for fare violations
- Contacting and working closely with Sound Transit Police Department (STPD) to identify and refer theft and degree charges
- Assisting STPD at their request during police contacts
- Preparing and submitting reports/affidavits to local courts and STPD
- Testifying in court hearings
- Participating in regular training

The Security Operations Center operates 24 hours per day, 7 days a week. SOC duties include:

- Monitoring and receiving telephone calls
- Receiving and documenting calls to and from the Security Officer, Station Agents, Supervisors, and other designated personnel
- Maintaining an overall situational awareness of routine and emergency events
- Directing (dispatching) resources to assist Operations, Customers, Security, or other personnel
- Receiving, screening, documenting, and directing customers to appropriate resources for investigation or information
- Maintaining a daily log for Security Officers and Station Agents
- Monitoring CCTV systems and Customer Emergency Phone
- Contacting appropriate Emergency Service Personnel as necessary
- Inputting facilities work requests as called in by Station Agents or Security Officers

- Making proper notification to appropriate Sound Transit Duty personnel in event of incidents
- Providing Variable Message and Public Address Announcements as directed
- Providing information to appropriate Station Agents and Security Officers as necessary for both routine business and emergencies

Law Enforcement

The primary responsibility for law enforcement remains with relevant local jurisdictions where Sound Transit is operating. In contrast to the security unit, Sound Transit's police department is comprised of commissioned law enforcement officers sourced from KCSO. This unit provides dedicated law enforcement resources supporting both service lines and facilities. Particular law enforcement roles include Patrol, Detective, Explosive Detection K9, and the Crime Analysis Unit.

The following law enforcement resources are deployed:

- Chief of Police
- Patrol: Twenty-four Patrol Deputies are assigned as follows:
    - Ten on Day Shift, made up of five working Sunday through Wednesday and five others working Wednesday through Saturday
    - Fourteen on Evening Shift, made up of seven working Sunday through Wednesday and seven others working Wednesday through Saturday. For each squad of seven, three are assigned to 1400-0000 and four are assigned to 1530-0130
- Detectives: Three detectives led by a detective sergeant to investigate assigned cases and provide a "plain clothes" presence to patrol trains and platforms in problem areas
- Explosive Detection K9: Two explosive K9 units provide detection and deterrence support
- Crime Analyst Unit: One crime analyst (compiling statistical crime data)
- Four patrol sergeants: This group supervises the patrol deputies. One captain oversees the sergeants.
- There is one administrative staff position.

The chart below depicts deployment on any given shift, day and night:

	Transit Security Officer	Fare Enforcement Officer	Sound Transit Police Deputy
Customer Service	X	X	X
Station Security	X	X	X
Alarm and Camera Monitoring	X		
Layover/OMF Security	X		
Uniformed Presence	X	X	X
Infrastructure Checks	X		X

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	Transit Security Officer	Fare Enforcement Officer	Sound Transit Police Deputy
Enforcement of Fare		X	X
Transit Conduct Compliance	X	X	X
Transit Conduct Enforcement			X
Enforcement of Traffic Law			X
Enforcement of Criminal Code			X
Verification of Identification			X
Warrant Arrests/Processing			X
Typical Day Shift (2015)	15	4	4
Typical Night Shift (2015)	15	6	5+1

Sound Transit has identified numerous alternatives as possibilities for future resource deployment including:

- Continuation of the status quo model as the system expands
- Increasing current levels incrementally as the system expands, to achieve maximum efficiency and productivity while monitoring the accomplishments of the Agency's public safety program's goals
- Use of 100 percent law enforcement
- Use of 100 percent private security
- Various mixtures of the law enforcement and private security referenced above
- Various levels of coverage, ranging from maintaining current budgetary levels while the service expands, to considering reductions in force or in the total estimated cost

One new option being considered is the use of "limited commission officers" to bridge the functionality provided by the two disciplines. This option is in the early legal stages of feasibility analysis and discussion between KCSO and Sound Transit. The Agency's management team continues to study its future expansion options during ongoing annual planning exercises.

Criteria

Deployment alternatives analysis has largely been conducted by management through the evaluation of service needs and associated risk factors, and is used to assess the operating and facilities risk as defined and documented in the Agency's threat and vulnerability assessment (TVA). This is especially true for the security provided around facilities where risk assessment factors are adequately evaluated. The same risk factors utilized in the TVA are being considered as evaluation criteria by Sound Transit for any new deployment alternatives that are considered.

Cause

The current approach to deployment has its roots in the Agency's original decisions to establish security and law enforcement functions. This approach was followed by management in place when the Agency transitioned to an ongoing operations unit approximately seven years ago. In 2009 the Operations

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Department was formally established. Prior to that time the agency had ongoing operations with the start of ST Express in 1999. The security function has gone through a lot of transition since operations initiated, with the latest change in 2013 when security moved from an independent function reporting to the Executive Department reporting to the DCEO, to the Operations Department reporting to the Executive Director of Operations. The original law enforcement and security leaders established the initial deployment approach to get the function off the ground. Their approach was rooted in institutional knowledge brought to the table by the leaders hired at the time to manage the operating program. This includes the original KCSO Police Captain and Security Operations Manager. Deployment has been modified as the Agency evolved, but the original strategy has largely remained intact. Relevant factors that have influenced the continuation of this approach include:

- The current approach being operationally viable, addressing both the public's and Agency's immediate security and enforcement needs.
- Sound Transit's Public Safety Program approach to management and staffing, which includes organizational structure and corresponding resourcing.
- Separate KCSO and Securitas enforcement and security organizations using a proven approach that has been used in many other jurisdictions.

As in any new organizational function, the evolving public safety program at Sound Transit has taken time to mature and continues to move through the natural stages of organizational development. The next step in the Agency's progression is the continued evaluation of alternatives including both organizational and service deployment factors.

Effect

The current approach to the public safety program is generally a continuation of the status quo. The system is deemed viable and delivers an operational program. While continuing with the status quo is considered viable, it has yet to ensure, confirm, or prove that deployment is operating in the most optimal and cost-effective configuration. Given the specific time allocation for management and operations staff, alternatives have not been analyzed in detail; hence, the status quo remains.

The result is that the current deployment model continues to evolve incrementally, while making refinements to allocations and making other systematic improvements to processes and systems. The current approach tends to "tactically react" to incidents occurring around the system, rather than approaching deployment strategically.

Recommendation

Study alternative deployment models in further depth, taking into account program needs, resources, and desired outcomes.

Evidence suggests that Sound Transit operates a safe system. The question being posed by this observation is whether the Agency can do more with the same amount of resources, or deliver the same

effectiveness with fewer resources. Alternatives analysis should be conducted by analyzing needs, plans, resources, risks, costs, and outcomes. A risk assessment approach should be conducted for each alternative, based upon public and Agency needs. Plans may then be put in place to pursue an optimal cost-effective deployment configuration. Alternatives should include an evaluation of the effectiveness of using regional law enforcement partners in other overlapping jurisdictions (see further discussion in Observation B). Several tasks should be conducted in any alternatives analysis including:

- Beginning with analysis of Agency's historical approach and current law enforcement projections, extrapolating to the planned service expansion.
- Analyzing alternatives (including regional partners).
- Conducting a risk assessment related to each alternative, comparing Agency plans against alternative deployment strategies, including review of needs and risks.
- Evaluating projected outcomes of the public safety program, including law enforcement, fare enforcement, and security; and evaluating each concurrently including interdependent impacts on each other.

Originally, the Sound Transit public safety program took an approach to establish strong security around Link Light Rail. This deployment approach has been in place for years. The forthcoming expansion provides an opportunity for Sound Transit to analyze the deployment strategies and resources needed to go forward, including formal modeling of cost projections.

B. PUBLIC SAFETY PROGRAM PARTNER AGREEMENTS

Observation: Formal inter-local agreements between the region's many security/law enforcement providers and Sound Transit are limited, leaving Sound Transit without a clear definition of roles and responsibilities to ensure an optimal alignment of resources for public safety.

Condition

Sound Transit subcontracts the majority of its law enforcement responsibilities to KCSO. Meanwhile, other jurisdictions also provide law enforcement within the Sound Transit geographic footprint. King County Metro, for example, provides security in the Downtown Seattle Transit Tunnel (DSTT). Seattle Police provide enforcement within the Seattle city limits. Other cities within King County also police public transportation facilities, parking lots, and platforms. Pierce and Snohomish County Sheriff Departments provide law enforcement in the south and north Puget Sound, respectively. These agencies overlap to some degree and may operationally interface with Sound Transit security and law enforcement functions while providing services in and around the Sound Transit geographic footprint.

Sound Transit conducts security operations through many of these jurisdictions, but does not have formal agreements with the majority of these organizations. Currently, among the many governments and agencies involved in enforcement with Sound Transit, there are only two active MOUs and one inactive/out-of-date MOU. The two active MOUs include the cities of SeaTac and Lakewood. The agreement between Sound Transit and Federal Way officially expired in November 2010, but is still

generally being treated like an active agreement. Additionally, there are other agreements established specific to projects, including with the cities of Issaquah and Bellevue.

Criteria

A MOU is essentially a formal written agreement used between governments to clearly spell out who does what, when, and where. MOUs define roles and responsibilities between multiple parties who operate together and deal with common interests, in this case, providing law enforcement and security around public transportation. MOUs typically deal with issues like spending and legal responsibilities. MOUs can be developed for either broad or specific reasons and cover specific time periods. Parties can, and do, place many parameters in MOUs. As such, MOUs come in all shapes and sizes. Related to security matters, Sound Transit heretofore has only used MOUs for specific issues.

Cause

Sound Transit operates within 54 jurisdictions in the Puget Sound region. The various local government agencies rub against each other, and many have their own law enforcement functions. Meanwhile, Sound Transit's light and heavy rail lines operate throughout the regional footprint, crossing many jurisdictional boundaries. The large number of jurisdictions involved and their responsibilities related to security overlap, resulting in a complex and dynamic delivery model. Coordination is required to deal with the many security and law enforcement issues that arise daily. However, there is a lack of definition and agreement between parties regarding security roles and responsibilities. Understandably, the lack of a defined response protocol impacts the enforcement response (whether it regards incident response or who remains in charge).

Sound Transit has many business partners who work together to deliver security. Only three are identified in MOUs. Many others work together, but their responsibilities lack definition, including areas of overlap. Historically, Sound Transit security has developed MOUs to be narrowly defined. There is nothing wrong with using MOUs in this fashion. With that said, the current approach does not address the broader picture, including significant relationships between the parties who are expending resources and already involved with each other in the region providing daily security operations.

Using Sound Transit's own criteria of attending to specific issues, several situations appear to require MOUs. Locations that should be reviewed and considered for potential future MOUs include larger local governments (e.g., City of Seattle, Pierce County, and Snohomish County).

Effect

The dynamics between the dozens of governments involved are enough to cause communication and jurisdictional issues, as well as service delivery impacts including capacity management, dispatch, scheduling, and coordination issues. Ultimately, resource deployment costs are significantly impacted due to overlap.

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Recommendation

Develop MOUs as appropriate where roles and responsibilities would benefit from further definition or where coordination of resources is complex.

Using Sound Transit's own criteria of attending to specific issues, several situations will likely benefit from MOUs. A work plan should be developed to focus Agency efforts on establishing relevant MOUs that are likely to produce benefits in the near term. Several steps are needed to evaluate when and where MOUs may be needed. First, developing criteria and profiles for MOUs which would be beneficial. Such criteria would include circumstances when multiple jurisdictions operate in the same area. Five factors could be addressed in a MOU, including who has jurisdiction, response times, backup protocols, follow-up, and reporting. Cost responsibilities may also be a factor to address.

Second, an inventory of the specific jurisdictions that operate in the region should be conducted, including specific overlapping responsibilities. Such an inventory would identify circumstances that may benefit from further definition.

Third, local jurisdiction roles should be matched up with Sound Transit's scope of operations, including facilities and service lines. This third step could identify gaps in the security model, and identify areas requiring clarification and further coordination.

Fourth, and last, those areas that require clarification would potentially be documented in a MOU. Ultimately, if and when specific circumstances demand further definition and require increased coordination, such agreements should be put into place. It is anticipated that MOUs will strengthen efficiency and effectiveness in security and enforcement coverage. The approach will primarily address law enforcement and possibly address security.

C. CRIME DATA

Observation: Sound Transit produces crime data at basic levels, but does not utilize such information for advanced analysis or for detailed planning purposes.

Criteria

Currently, Sound Transit gathers data related to security incidents and crime across its two distinct functions: law enforcement and security. Crime data is gathered, aggregated, and reported by STPD through the use of the Computer Aided Dispatch (CAD) system and the KCSO Incident Reporting and Investigation System (IRIS), which serves the role of records management. Crime data is structured and organized for reporting purposes in a format similar to the FTA's form 405, which groups crime data into three categories: Part 1 offenses, Part 2 offenses, and standard of conduct violations.

Security-related data is manually gathered and reported, with a heavy reliance on paper and spreadsheets, to reflect the total number of incidents by category (e.g., bus, facility, and train), mode of transit, month, and location. Security reports also include additional categories of information, such as Part 1 and Part 2 activity observed, facility activities, routine activities, serious activities, and warnings

and citations by rider demographic. While an automated dispatch and incident logging system is available (CCSI), it is not expected to become fully adopted and utilized until the new 800 MHz radio system is deployed.

A MOU currently exists between the City of Seattle and KCSO that sets the expectations for KCSO's agreement to manage and staff Sound Transit Police Department (STPD). This MOU stipulates that, while STPD deputies are expected to take initial action when they come across non-Metro related criminal activity, the Seattle Police Department (SPD) shall assume jurisdiction over the case if an incident requires follow-up investigation. In today's model, STPD handles transit-related crime and does not have to inform SPD, per the MOU. However, for larger crimes (violent, robbery, etc.) there is a handoff that occurs. The MOU defines exceptions of incidents that STPD does not handle (felonies, homicides, etc.). Additionally, the MOU stipulates that STPD and SPD crime analysis personnel shall maintain regular contact on a no less than monthly basis regarding trends and incidents affecting both agencies. Yet, the protocols and level of coordination regarding the exchange of crime analysis data is not specified in detail.

STPD computes and reports corresponding crime statistics using a per capita basis. Utilizing this approach, Sound Transit reports that 1.587 Part 1 offenses and 1.968 Part 2 offenses per 1,000 riders occurred in 2013 (based on a daily ridership of 31,500). This model is similar in structure to how local law enforcement agencies report crime, where measurements are computed based on a per 1,000 citizen count. However, this differs from the approach that many transit agencies use, where crime statistics are reported on a per million riders basis. In reviewing crime statistics reported by other transit agencies, we noted that crime reporting entails Part 1 and Part 2 crime statistics on a per capita basis. In contrast, crime statistic reports provided by Sound Transit appear to aggregate crime data as "violent" or "property related." Violent crimes and property crimes can occur in both Part 1 and Part 2 categories, due to their level of severity.

Condition

The ability to capture and utilize crime data is important to a transit agency, as it supports decisions regarding staffing levels and the resource deployment necessary to ensure passenger safety and satisfaction. Data availability, accuracy, and timeliness are relevant to planning. In the short term, gaps in crime data availability can negatively impact analysis activities, such as TVA studies. Over the long term, crime data gaps can impact overall public safety. To this end, the ability to analyze and correlate crime data, ridership trends, and service levels is considered a significant factor in strategic planning, public relations, and maintaining taxpayer support.

Crime data utilization depends on a comprehensive and integrated process, including crime data collection and input (including servicing from business partners), analysis, reporting, and monitoring. All such activities build on each other to produce usable information that can help Sound Transit management improve resource utilization, and ultimately optimize public safety. The above analytical and reporting process will require an efficient and effective approach, workflow, and systems that are

regularly utilized by Sound Transit personnel to make safety-related decisions based upon available data.

Cause

Several factors are impeding Sound Transit's ability to gather and manage crime data. Chief among these factors include the many agencies involved with various data tracking methods and systems, lack of collaboration across agencies, inconsistency of data handling and classification within Sound Transit during data entry, and cumbersome manual processes (e.g., paperwork and spreadsheets used to initiate and track security incidents).

In today's model, STPD is primarily focused on handling transit-related crimes. While STPD can respond to more serious offenses such as homicides and assaults, the expectation is that these offenses will be handled by local law enforcement agencies. Courtesy calls and notifications are expected to occur between STPD and local law enforcement agencies as needed (e.g., when local law enforcement responds to a transit-related crime, or when STPD responds to a non-transit crime). This division of responsibility presents an inherent challenge for Sound Transit in capturing accurate crime data.

Additionally, citizens often dial 911 when they see a crime occurring in a Sound Transit facility (e.g., a light rail station). Local police are often dispatched in this case, which ends up as a crime statistic that typically resides in the local police department's CAD system, and does not become part of Sound Transit's crime data collection and reporting process.

While Sound Transit Police has a CAD system to support crime data analysis and inquiry, it was noted that officers and dispatchers are not entering data in a consistent manner. The STPD crime analyst currently works around this by adjusting the data in a local copy so it is more usable for discovery and reporting.

Form 405 was initially championed by the FTA in 2000 to enable the submission of transit agency security information to the National Transit Database (NTD). This form has since been abandoned, due in part to the 9/11 terrorist attacks and ensuing counterterrorism priorities. The Department of Homeland Security (DHS) intended to get involved in this reporting initiative, but has since remained focused on fighting terrorism. Thus, transit data has ended up being regarded as a secondary priority, and the NTD has been discontinued. Aside from crime statistics published independently by various transit agencies, the transit industry as a whole does not have the means or resources to collectively submit, aggregate, and report on crime data as an industry.

Effect

Sound Transit's limited ability to capture, utilize, and report crime data is impacting its ability to report and proactively address security and crime trends. In reviewing the monthly and annual Safety, Security, and Risk Oversight Committee (SSROC) reports provided during field work, we noted that security incident data, crime data, and crime data trends were included in the report at a comprehensive level. We also noted that law enforcement activity is addressed in these reports mostly from a historical

perspective. In other words, the number of reported crimes is provided, followed by a narrative summary of each significant crime or case, followed by a matrix showing where patrol activity (e.g., area/platform checks, train rides, etc.) occurred.

The comprehensiveness and consistency of crime data directly impacts the staffing levels and resource utilization necessary to ensure passenger safety and satisfaction. The goal of capturing and using crime data is to ensure that the public safety program is operating both effectively and efficiently.

Sound Transit's footprint covers 1,000 square miles and spans 54 law enforcement jurisdictions. When violent crime or a Part 1 offense occurs, there is typically a handoff to the local jurisdiction due to the "right of first refusal" arrangement. This arrangement tends to skew crime statistics, since the cooperation needed to obtain crime data from other jurisdictions is voluntary in nature.

What appears to be missing from the reporting process is an indication as to how crime data, crime trends by location and mode of transit, security incidents, and fare enforcement efforts are being coordinated to adjust or enhance law enforcement patrol assignments, train rides, and security personnel assignments. This sort of coordination would result in an improvement to the overall total security posture.

As a result, it was noted that a disproportionate number of area/platform checks occurred for some locations (e.g., Stadium, SODO, and Mt. Baker), while crime and security statistics suggest that problem areas such as Kent, Auburn, Tukwila, and Rainier Beach should receive more coverage. Further, the inconsistent manner in which data is entered into the CAD system results in a time-consuming process for correction that lends itself to manual error and limits the ability to reuse CAD data beyond short-term reporting tasks.

In the past, Sound Transit has historically reported crime statistics differently from other public transit agencies. The approach used in reporting per capita crime rates suggests that crime rates in other transit agencies are substantially lower. For example, the Washington Metropolitan Area Transit Authority (WMATA) in Washington, D.C., averages between 8 and 9 Part 1 crimes per million riders for years 2008 to 2011. Similarly, there were 1,216 Part 1 crimes reported on Metro Los Angeles's buses and trains in 2010, or about 2.77 crimes per million boardings. There were 2.63 Part 1 crimes per million riders reported on the MBTA system in Boston in 2010, and 11.03 crimes per million riders were reported on the DART system in Dallas.

One would infer that by multiplying Sound Transit's per capita crime rate by 1,000, the Agency achieves equivalency with these other transit agencies. Doing so would result in 1,587 Part 1 offenses and 1,968 Part 2 offenses per million riders.

Upon closer examination, we noted that the ridership factor used by other transit agencies to compute crime statistics is being annualized. When this approach is applied to Sound Transit's crime statistics, this equates to 3.91 Part 1 crimes per million boardings in 2013, indicating that Sound Transit's crime statistics are in a normal range. When data is normalized, we see what appears to be a relatively low occurrence of Part 1 and Part 2 crimes. For 2013, Sound Transit recorded 50 Part 1 crimes and 62 Part 2

crimes. By contrast, WMATA averaged between 1,800 and 2,200 Part 1 crimes annually for the years 2008 to 2012. There were 1,216 Part 1 crimes reported on Metro LA's buses and trains in 2010. DART reported 615 Part 1 crimes for 2012 and 716 Part 1 crimes for 2013. The MARTA system in Atlanta reported 539 Part 1 crimes for 2013.

With the current approach to crime data reporting in place, Sound Transit is not positioned to readily compare the performance of its security and public safety programs to other transit agencies. This impacts the Agency's ability to compare its security and law enforcement resourcing levels alongside similar transit agencies (e.g., TriMet). This situation also impacts Sound Transit's ability to plan and monitor performance against operational budgets.

Recommendation

Develop systems to capture crime data, and assign new resources to the process.

The questions being posed by this audit are valid and are likely to advance public safety. To address such questions, Sound Transit will need to strengthen the safety data collection capabilities it has followed since 2010. Improvements are needed in all data categories including:

- Standardizing data inputs from Sound Transit's business partners
- Enhancing analysis, which requires both system and human resources
- Automating data collection and tracking
- Improving reporting
- Making management decisions to assess where and what public safety or law enforcement measures should be applied to each circumstance or trend

We recommend shifting crime data reporting from comparisons to benchmarking against local municipalities and other transit agencies that are similar in profile. This will make Sound Transit more comparable to public transportation metrics. The comparison will aid Sound Transit in correlating and modeling its current level of law enforcement and security resources alongside meaningful crime statistics that are grounded in the transit industry.

Security incident reporting is fairly comprehensive at Sound Transit. While significant data is produced, numerous opportunities exist to better capture and utilize crime data. Much of the current data is manually gathered and reported. Opportunities to improve the process include improving data sharing and coordination with Sound Transit partners, training for CAD system data entry, and adopting reporting procedures in use at other public transportation agencies.

Sound Transit implemented this recommendation in early 2015.

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D. SCOPE OF ADMINISTRATION

Observation: The Sound Transit Security and Law Enforcement Divisions spend much of their time and resources on operational matters, and significantly less time on administrative functions**.**

Condition

The Sound Transit Security Division duties cover wide territory. The scope of duties incorporates both administrative and operational functions, with emphasis appropriately placed on security operations duties. The Division defines 17 main responsibilities in its scope, with the vast majority of these duties oriented toward operations. Given the Division's role in contract oversight, much of its time is devoted to the day-to-day public safety program delivery. Management reports its primary functions to include:

- Contract Management
  - Securitas Contract
  - Weekly Management/Meetings
  - Coordination with Police Department
- Human Resources
  - Performance Evaluations
  - Meetings, Coaching/Mentoring
- Operations
  - Management Meetings
  - Plans and Procedure Development
  - Investigations
  - Inventory Tracking
- Financial
  - Budget Development
  - Budget Review
  - Invoice Review
  - Special Requests
- Long Term Planning
  - Long Range Planning
- Risk Management
  - Investigating Claims
  - TVA/PSA Review
  - Annual Risk Review

The Sound Transit Security Division employs four personnel, including the Chief Security Officer, Project Assistant, Security Specialist (Operations), and Security Specialist (Facilities). Additional positions involved in the safety function include a subcontracted Securitas Account Manager overseeing the Transit Security Unit, Fare Enforcement Unit, and Security Operations Center.

Criteria

All organizations require some portion of their resources to attend to administrative matters. Administration is essential for both strategic management and the other duties that are associated with running the business affairs of any organization. Administrative duties include management, budget, human resources, accounting, data analysis, technology, and documentation functions.

Such matters are often referred to as "staff" versus "line," positions and are typically defined in organizational and financial circles as administrative overhead and accounted for as necessary indirect functions. In government, administrative functions often account for 10 to 20 percent of the core operating budget.

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Cause

Sound Transit has been developing its Security Division functions since 2008. The Agency has heavily concentrated on operations to build out the public safety program. The small devoted administrative team spends the majority of its time consumed with daily operations. This process is continuing with the planned rail expansion.

Several factors are impacting staff efficiency and effectiveness, including a stated lack of capacity, turnover and vacant positions, and cumbersome processes combined with a lack of systems. The financial/cost analysis functions in particular stand out as lacking sophistication, and are not being conducted at a sufficient level to support long-range planning, resource allocation, or capacity analysis.

Effect

During the performance audit, the division was polled about the time spent on administrative matters. The Director reported that time and resources are allocated mostly to operational matters. Less time is being devoted to human resources, financial, risk management, performance reporting, and data analytics. Due to management's current approach to resource allocation, limited time is being devoted to some key administrative matters. As a result of this approach, business and financial planning and analysis is occurring at only at high levels, and tracking and reporting duties are limited.

Recommendation

Allocate additional resources to administrative functions including data analytics, performance reporting, planning, financial, and risk management activities.

The capabilities that are required include people, processes, and systems. This effort may involve adding FTEs. Such resources could potentially come from Sound Transit's current Finance and Accounting personnel. External consulting firms are also a possible resource. The Agency's business analysts could also be used in a shared services format.

E. PERFORMANCE MEASUREMENT

Observation: The public safety performance measurement program has an established procedure that focuses on internal Sound Transit processes and tracks outputs with basic available data; otherwise, important information is missing regarding outcomes of the security and enforcement functions, including information provided by external third-party partner agencies.

Condition

Sound Transit tracks basic measures for input, activity, and output. The Agency also tracks some outcome measures. The Chief Security Officer began developing performance measures in 2010. These measures address a range of activities undertaken by Security Department staff and contractors. Many standard security performance measures are developed and tracked at Sound Transit, including a comprehensive set of monthly, quarterly, and annual measures. Both ongoing activity "counts" and

output measures are produced. The performance measurement process includes tracking and reporting goals as well as corresponding measures of customer service, departmental operations, and management. Such measures are collected at timely intervals. These are primarily output measures, which describe tasks accomplished within a specific time period.

Exhibit 1: Existing Security Performance Metrics

Annual	Quarterly	Monthly
Public safety cost per boarding	Percent of audits accomplished	Fare inspection percentage
Public safety costs as a percent of operating budget	Average number of days to process invoices	Percentage of Central Link infrastructure check accomplished
Customer satisfaction survey grade	Average number of errors per invoice	Percent of post inspections accomplished
Percent of TVAs accomplished	Average days to fill vacancy (contract security)	Percent of facilities inspections accomplished
Revenue loss to fare evasion	Percent of construction site security audits accomplished	Percent of unfilled posts (contract security)
	Average number of days to process badge requests	Customer emergency station inspections

In addition to the performance measures shown above, the Security Department collects a wide range of activity data, referred to as "counts." The KCSO also reports a number of metrics as part of the County's annual indicators and measures program. These metrics include resident perceptions of safety, crime rates, and vehicle accident rates.

It should be noted that since the time the security performance audit began, the Agency has changed the manner in which "violent crime" is reported (as of January 2015). This is considered a useful change in the process of security reporting and performance measurement. Such reporting also provides increased comparability with peer public transit providers.

Criteria

The Federal Transit Administration's (FTA) *Transit Safety Management and Performance Measurement Guidebook* recommends that transit agencies shift their focus from output/process measures to outcome measures that focus on safety goals and long-term impacts. Outcome measures communicate program or service effectiveness, while efficiency measures describe program or service productivity in terms of resource consumption to achieve results. Output measures answer the question, "What are we doing?" but do not describe the efficiency, productivity, or cost-effectiveness of the public safety program.

Performance metrics cover a wide territory, including process metrics reported over appropriate and relevant time periods, as well as quantitative measures augmented by qualitative customer satisfaction. The scope of performance measurement includes data, processes, systems, and utilization. In support of performance tracking and measurement, data collection can incorporate data sourced from four different stakeholder groups including police and safety personnel, customers, analysts, and accountants.

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First, security officers and safety personnel can report incidents and corresponding actions along with routine daily reporting. This type of reporting includes response times to incidents/calls. Both officers and dispatch may be involved in the daily data gathering process. Second, customer responses can be captured in parallel with the existing customer feedback program. Customer surveys can be conducted annually as part of the onboard survey process. Third, Sound Transit analysts can provide available Agency data to calculate performance measures. Representative outcome measures include:

- Crime rate per number of officers/security personnel
- Cost per call
- Fare inspections per FTE
- Fare box recovery rates

The Sound Transit financial system can provide cost information to security to help calculate revenues and expenditures. Fourth, because Sound Transit is partnering with many jurisdictions in the region, external agencies are natural sources of security data. This fourth data source is problematic in that data is not easy to obtain (access is impacted by data availability, logistics, and resources/costs). Not all agencies track information and not all have the time and resources to do so. As such, a complete picture of security is not readily available.

Cause

When establishing a performance measurement program, it is a common practice to track and report statistics that are easily accessible. Sound Transit's measurement program began five years ago in 2010. The Agency accessed measures that were readily available and easily trackable to gauge program performance. In many governments, the most readily available metrics are activity-based statistics, procedural counts, and output measures. Sound Transit's approach to date is no exception to this approach.

Sound Transit formulated measures around its defined core mission related to facilities and fare evasion. The performance measurement program is primarily developed around such efforts and output measures. This approach tends to view only one side of security. A comprehensive view of the program has not yet been established, including a full assessment of the law enforcement service levels.

Effect

Sound Transit's performance criteria cover inputs, activities, and outputs. Outcome measures are partially addressed. The lack of outcome and efficiency-based performance reporting for security and policing limits the capabilities of the Board, management, stakeholders, and the general public to understand and assess performance efficiency and effectiveness, as well as accomplishments and needs. Often, the public hears about Sound Transit security when a problem arises, whereas performance reporting would empower the Agency to communicate its story from a proactive and positive viewpoint. The resulting focus of concentrating on inputs and outputs is to direct attention and resources to

processes and activities. This approach limits efforts to track program metrics, versus impacting public safety results.

Recommendation

Develop additional security and law enforcement efficiency and performance measures, which will add important data relative to tracking outcomes and program effectiveness.

Performance measurement data collection can be enhanced. Potential new measures should be considered in terms of value, data availability, and the process for assembly. We recommend that third parties acquire and process additional public safety data with agency partners, and that Sound Transit develop and implement a straightforward and systematic way to transfer such data in a standard, automated format. A new Sound Transit repository will be needed to store, track, process, and report such data.

F. THIRD-PARTY DATA REPORTING

Observation: While Sound Transit gathers some relevant data from peer government jurisdictions, it is not gathering comprehensive data from external parties that could be useful in alternatives, cost, and service delivery analysis.

Condition

Sound Transit gathers significant data relevant to the public safety function from third parties, including security incident data, crime data, and crime trends. This data includes transit conduct incidents (e.g., trespassing, fare evasion), Part 1 offenses (e.g., theft, assault), and Part 2 offenses (e.g., vandalism, drug possession, misdemeanors). While some data is gathered and reported, other data is not readily obtainable. Some agencies are not in a position to report such data, and others do not report it in a timely or consistent manner. Data is gathered and reported by many of Sound Transit's partners, but is often provided manually in a summary paperwork format. Law enforcement agencies generally do not share this type of data, and for the most part, are not analyzing such information. Data submitted to Sound Transit is underutilized and not fully scrutinized for planning purposes

Criteria

The ability to capture, coordinate, and utilize both crime and security incident data is paramount to any transit agency, since it drives staffing levels and the resource utilization necessary to ensure passenger safety and satisfaction. In the short term, limitations in data integrity and completeness can also negatively impact distinct activities, such as TVA studies. In the long term, crime and security data integrity issues threaten public safety. Overall, the ability to collect, consolidate, and analyze data also dictates the Agency's ability to establish performance metrics and proactively manage ongoing activities and staffing levels.

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Cause

Data handling and analysis is problematic at Sound Transit because external parties produce data manually and do not always share such data. Further, when shared, it not always provided in a timely manner and not consistent in format or diction. To make use of data systems, processes are required to provide useful reports. However, no comprehensive data repository exists where this information can be input to provide a holistic perspective, and Sound Transit lacks tools to support personnel in their efforts to analyze alternative ways to optimally deliver the security and law enforcement program. Ultimately, a lack of well-defined technology, processes, and systems at Sound Transit and its peers impedes public safety program information processing and reporting.

Effect

While Sound Transit is positioned to conceptually analyze safety performance (i.e., crime data, security delivery) without access to third-party security operations data, the Agency is not positioned to analyze a complete picture of the regional public transit security posture and performance.

Recommendation

Develop updated processes and systems to capture data from regional peers and combine with Sound Transit's database to deliver a data reporting system that can further help the Agency analyze operational effectiveness.

The following alternatives are provided in order to improve the accuracy of Sound Transit's crime data:

- Open a dialog with local law enforcement agencies in order to set the stage for improved collaboration and coordination. Consider updating the MOUs with local law enforcement agencies to stipulate expectations and procedures for sharing crime data (see Observation C for further discussion regarding crime data).
- Provide training as needed to standardize data entry in the CAD system. Ensure that data input procedures are established and documented to support the current training program. Similarly, develop policies and procedures to ensure that law enforcement officers update their skills in reporting and listening to classification calls to take advantage of the new 800 MHz radio system.
- Establish workflows jointly between Sound Transit security and law enforcement to consolidate crime data and security incident reporting procedures in order to eliminate redundancy and overlap.

G. CORRELATION OF FARE ENFORCEMENT AND LAW ENFORCEMENT

Observation: The relationship between law enforcement, security, and fare enforcement functions is understood at a macro level, but has not been fully analyzed to identify optimal staffing levels for each function.

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Condition

Sound Transit security and law enforcement goals are defined at a high level. Security and fare enforcement forces are deployed by using a risk assessment approach, which is generally a best practice. TVAs are part of this process, which assist in defining security coverage around facilities. Ongoing evaluations garner a significant amount of detail, which is then considered in a risk assessment process. The risk assessment is used to help determine, through high-level planning and analysis, what security resources will be deployed. Plans for fare enforcement and law enforcement are not fully integrated. As of this date, Sound Transit management has not fully analyzed the correlation and costs of the fare enforcement and law enforcement relationship.

The overall public safety program covers 13 functions. The interrelationships between law enforcement and security are defined in terms of functional responsibilities. Function overlap is recognized to occur in the following areas:

- Customer service
- Station security
- Infrastructure checks
- Enforcement of fare(s)
- Transit conduct compliance

The public safety program provides a specific security force covering both day and night shifts. These are deployed in a particular ratio (determined by historical allocations). There does not appear to be a known formulaic relationship between the enforcement and security functions, though the primary goal linking law and fare enforcement is the need for KCSO/STPD to respond to fare enforcement when needed in 9 minutes or less, on average, and within 10 minutes to dispatched calls for service. Such functions are correlated based upon need, as determined by historical and current rates of crime. Otherwise the functions are managed separately.

Law enforcement resources are deployed differently from those of fare enforcement and security. Law enforcement also uses a TVA approach that incorporates factors such as geographic coverage and level of criminal activity into management's assessment, and appears to be conducted at a higher level than security. Judgment is heavily utilized to determine the overall program design. High-level performance delivery metrics are monitored and feed into the process. Deployment is ultimately based on King County's determination of the most effective approach given current resources.

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Criteria

Planning for deployment requires an assessment of the coverage area, crime levels, and service lines. Once known, defined, and understood, such factors are matched up against available law and fare enforcement, security resources, other external law enforcement jurisdictions, and budgets and outputs. Relevant criteria used to track enforcement include:

- Numbers of incidents/fare evasion rates
- Response times to incidents
- Costs used to balance combined resource deployment

The Agency conducts risk assessments for the security (Securitas) division; the methodology is well thought out, and the resulting risk assessments are reported categorically in a summary fashion.

Cause

There is a lack of detailed planning and analysis regarding the relationship between deployed law enforcement, security, and fare enforcement functions. Analyses of the interrelationships' impact on the cause and effect of the numbers of FTEs deployed have not been conducted, either by Sound Transit or KCSO. The Sheriff's Office builds and deploys staff based on its historical approach used for enforcement.

Overall, law enforcement has yet to analyze functions at the same level as security, and the two functions, law and fare enforcement, have not been modeled together. While the precise number of fare enforcement personnel does not directly drive the number of law enforcement personnel required or deployed, there is a correlation between the two functions. The exact relationship has not been specifically defined, nor has it been analyzed. It is important to acknowledge that law enforcement resourcing is in part impacted by fare enforcement. Historical rates can be analyzed (e.g., number of fare enforcement incidents that require backup from STPD) to better understand this relationship.

In summary, the Agency's approach to planning for law enforcement and fare enforcement has been mostly conducted on separate tracks. While acknowledging the relationship between functions, planning for such functions is tied to different Agency goals. The two groups are being managed by separate organizations and leaders. The intersection of the two functions is the Executive Director of Operations. The maturation of the two functions has yet to evolve to a point where planning for functions is fully coordinated or integrated.

Effect

Because of the separate organizational approaches, Sound Transit manages and delivers law enforcement and, for the most part, fare enforcement on separate tracks. The potential correlation between the two has yet to be fully explored. It is unknown at this time what combination could improve deployment of one or the other, or both.

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Recommendation

Study the correlation between fare and law enforcement functions to optimize resource efficiency and fare collection effectiveness.

Predictive analysis should be conducted to model the effects of changing force size (against geography, time and date, and crime rates), to ultimately determine the impacts of one group's size upon the other. Both functions require independent analysis to determine optimal deployment. When each is evaluated against the needs of the Agency and region, the two forces can also be studied together for correlation and cause and effect.

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IV. ACTION PLAN

Recommendations	Owner(s)	Timeline		
		1-6 Months	6-12 Months	12+ Months
A. Overall Public Safety Program Alternatives Study alternative deployment models in further depth, taking into account program needs, resources, and desired outcomes.	Exec. Dir. Operations*		√	
B. Public Safety Program Partner Agreements Develop MOUs as appropriate where roles and responsibilities would benefit from further definition or where coordination of resources is complex.	Exec. Dir. Operations* ST Attorney			√
C. Crime Data Develop systems to capture crime data, and assign new resources to the process.	Chief Security Officer* Director Facilities and Asset Control			√
D. Scope of Administration Allocate additional resources to administrative functions, including data analytics, performance reporting, planning, financial, and risk management activities.	Exec. Dir. Operations* Chief Security Officer		√	
E. Performance Measurement Develop additional security and law enforcement efficiency and performance measures, which will add important data relative to tracking outcomes and program effectiveness.	Exec. Dir. Operations* Chief Security Officer ST Police Chief	√		
F. Third-Party Data Reporting Develop updated processes and systems to capture data from regional peers and combine with Sound Transit's database to deliver a data reporting system that can further help the Agency analyze operational effectiveness.	Chief Information Officer* Director Facilities and Asset Control		√	
G. Correlation of Fare Enforcement and Law Enforcement Study the correlation between fare and law enforcement functions to optimize resource efficiency and fare collection effectiveness.	Chief Security Officer* Director Facilities and Asset Control			√

*Lead

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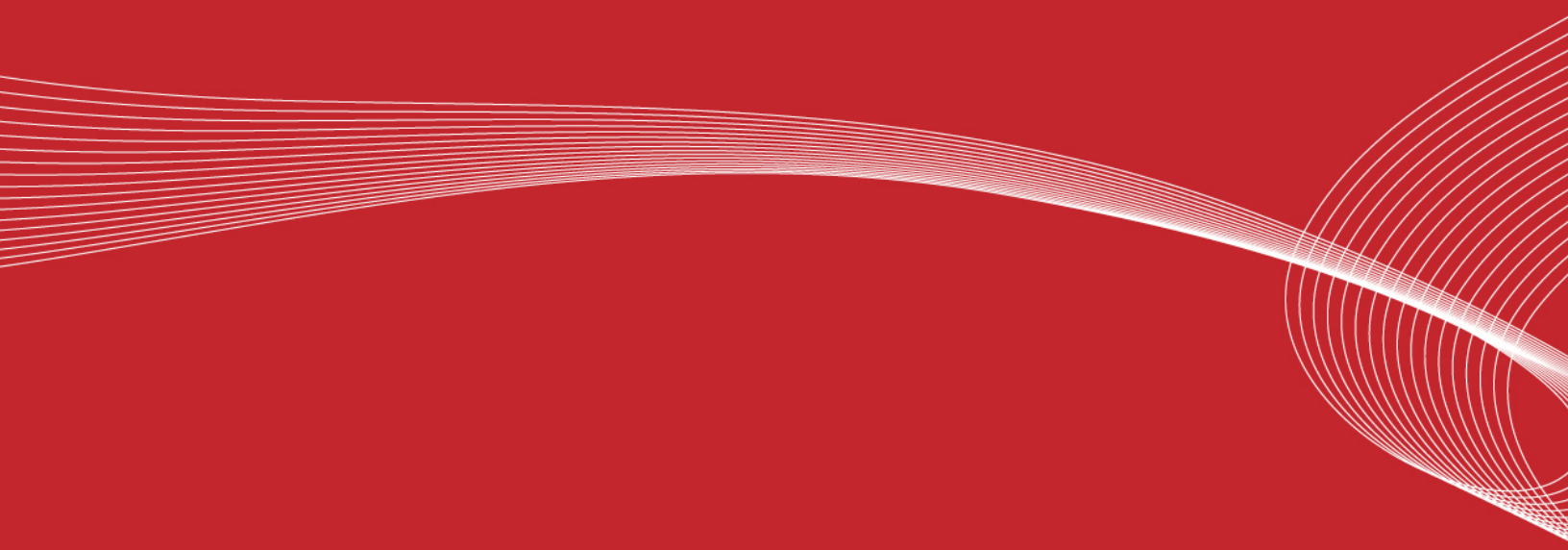
APPENDIX A

Public Safety Program Performance Audit Objectives Not Addressed in the Above Observations and Recommendations

Objective	Conclusion
2 - Describe Homeland Security compliance requirements in the Puget Sound region and identify alternative strategies to address.	There are no formal security compliance requirements imposed on Sound Transit by the Department of Homeland Security (DHS). Otherwise, there are general guidelines related to security and emergency preparedness that relate to public transportation that the Agency is aware of and is committed to monitoring.
6 - Assess the effectiveness of the fare enforcement program.	Sound Transit's historical fare evasion rates are 2.85% and 0.85% for light rail and commuter rail respectively. Compared to the industry average, Sound Transit fare enforcement is effective (when staff are fully deployed) with noncompliance in the range of 2% to 5%.
7 - Conduct peer analysis and benchmarking, surveying how other train/transit systems address public safety.	Sound Transit operates in a reasonable range of performance when compared to the three peer agencies reviewed, including: • Greater Cleveland Regional Transit Authority (GCRTA) • Tri-County Metropolitan Transportation District of Oregon (TriMet) • Sacramento Regional Transit District (SACRT) There were no right or wrong conclusions identified that would require Sound Transit to act with certainty to change security administration or operations. However there are practices within these peer agencies that have the potential to create opportunities and provide lessons for Sound Transit. For example: • The peer agencies particularly stressed the importance of conducting and maintaining strong communications with partnering public safety providers. Communications include regular meetings with each of the various agencies within the transit agencies' jurisdiction areas. Agencies noted that these meetings make a significant difference in how transit officers are viewed by the local law enforcement agencies. • Fare enforcement is an ongoing issue for all transit agencies, and transit agencies have implemented different models to support the efforts of fare enforcement. SACRT reported a "fare blitz" strategy: picking a station, and having 4 to 12 officers inspecting everyone who rides during a certain period. This strategy is conducted based on the level of community complaints and crime incidents.
11 - Review the Agency's threat and vulnerability assessments and consider alternative mitigation strategies.	Since 2006, Sound Transit has conducted an ongoing proactive Threat and Vulnerability Assessment (TVA) program. Due to ongoing efforts, management of the program is improving annually. In the most recent federal assessment, conducted in 2013, DHS gave Sound Transit excellent scores.



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